

# **ADDENDUM TO THE STRATEGIC FLOOD RISK ASSESSMENT (SFRA) OF THE DRAFT GREYSTONES-DELGANY AND KILCOOLE LOCAL AREA PLAN (LAP) 2013-2019**

**March 2013**

## **SECTION 1: INTRODUCTION**

The 'Draft Greystones-Delgany and Kilcoole Local Area Plan (LAP) 2013-2019' and associated Strategic Flood Risk Assessment (SFRA) was on public display during the period 19<sup>th</sup> December 2012 to 8<sup>th</sup> February 2013 inclusive. During this period members of the public, prescribed bodies and other interested groups were invited to make submissions. A total of 171 submissions were received during this period.

A summary of the issues raised in submissions received on the Draft Plan, including a response to these issues and recommended amendments to the Draft Plan are set out in the 'Manager's Report on Submissions or Observations received on the Draft Greystones-Delgany and Kilcoole Local Area Plan (LAP) 2013-2019'. This 'Addendum to the Strategic Flood Risk Assessment (SFRA) of Draft Greystones-Delgany and Kilcoole Local Area Plan (LAP) 2013-2019' firstly responds to issues received in submissions relating to the SFRA and secondly, undertakes a strategic flood risk assessment of recommended amendments to the Draft Plan as set out in the Manager's Report.

**It should be noted that this Addendum must be read in conjunction with the SFRA of the Draft Greystones-Delgany and Kilcoole LAP 2013-2019.**

## **SECTION 2: ADDENDUM TO SFRA ARISING FROM SUBMISSIONS**

This section includes a summary of the issues raised in submissions received on the SFRA, a response to these issues and amendments to the SFRA, as required in light of these issues raised.

<b>Submission from Office of Public Works (No.17) on SFRA</b>
<b>Summary of Issues Raised</b>
<p>OPW indicate that it is acceptable to retain the proposed zonings set out in the draft LAP and that flood risk has been examined comprehensively in the making of the plan.</p> <ul style="list-style-type: none"><li>i. The OPW welcomes the carrying out of a comprehensive Strategic Flood Risk Assessment (SFRA) as part of the draft plan, and the commitment to adhere to 'The Planning System and Flood Risk Management- Guidelines for Planning Authorities'</li><li>ii. Welcomes the inclusion of the mitigation objectives which address flood risk, as set out in Draft LAP and Wicklow CDP 2010-2016.</li><li>iii. OPW comments emphasise the importance of the application of a site specific flood risk assessment in the relevant areas.</li></ul>
<b>Opinion of Manager</b>
<p>The OPW has indicated that the planning authority has appropriately addressed flood risk within the plan area, in accordance with 'The Planning System and Flood Risk Management- Guidelines for Planning Authorities'.</p> <p>In accordance with TS5 of the draft plan, developments that are an 'inappropriate' use for a flood zone area, as set out in Table 3.2 of the Guidelines, will not be permitted, except where a proposal complies with the Justification Test for Development Managements, as set out in Box 5.1 of the Guidelines. As per this objective, site specific flood risk assessments are required to be carried out in accordance with the requirements set out in the Guidelines.</p>

Having regard to the above, it is considered that no change is required to the proposed plan.

**Manager's Recommendation**

No change

**Submissions from the public (No.'s 4, 50, 61, 62 & 148) on Map C: Indicative Flood Zones**

**Summary of Issues Raised**

- In addition to flood zones identified within the plan area, the following additional watercourses should be considered: watercourse from Delgany Woods under the R762, watercourse from Blacklion past St.Kilian's Church, watercourse from Lidl.
- Three flooding reports included – (i) from Cllr. Kelleher (18 January 2013), (ii) from Cllr. Kelleher re flooding in Rathdown Park (June 2012), (iii) Ms. Marie O'Reilly, 160 Redford Park. The contents of these reports should be considered in the preparation of the flood mapping.
- Map C which sets out the potential flood zones of the plan area is considered to be incorrect. The map identifies an area on Victoria Road which is liable to flooding however the cause of this flooding was due to the construction of ground works relating to the "Harbour View" apartments. This pipe became blocked during times of heavy rainfall, however over the years there has been work carried out to alleviate this situation. Any flooding that occurs on the street is now as a result of surface water where the gullies have not been cleaned. In addition it is considered that the flood mapping relating to the harbour area is incorrect and should be amended to reflect the construction of the new harbour area.
- A survey of the existing watercourses should occur in order to fully ascertain the direction of these watercourses. In addition this survey would illustrate if any of the drains and channels are blocked or if they are not deep enough to carry the flow of water that occurs.
- Plan refers to 'light' flooding – contrary to evidence of recent flood events this reference should be upgraded to areas of 'high risk'.
- The Planning Regulations should be changed so that flooding is considered as part of each planning application; houses should not be built near watercourses.

**Opinion of Manager**

- In order to address the submissions regarding additional watercourses and recent flood events it is considered appropriate to outline the principles of the Flood Risk Guidelines, which are as follows:
  - (1) Avoid inappropriate development in areas at risk from flooding
  - (2) Avoid new developments which would increase flood risk elsewhere.
  - (3) In exceptional circumstances some development may occur in areas of flood risk provided that the issue of flood risk is managed appropriately.

The purpose of carrying out a strategic flood risk assessment is to identify areas that are liable to flooding and to ensure that there are sufficient mitigation objectives to control development at such locations. This may entail zoning of land in such a way that prevents new development (e.g. OS zoning which would preclude the development of housing) or the inclusion of policies / objectives relating to the type or design of development in flood risk areas.

The watercourses that have been included on the Flood Map C were taken from the Office of Public Works (OPW) and the Water Framework Directive (WFD) databases. These sources did not identify

the water systems referred to in the submissions as flood risk corridors.

The additional watercourses that have been identified in submissions are piped, surface water drainage systems, predominately located in built up areas and have suffered 'flood events' as result of blockages in the surface system in the area. They are not flood risk zones or corridors in the same sense as land located along open watercourses. Therefore the appropriate solution to addressing these concerns is to:

- (a) ensure that the development of greenfield lands does not contribute more surface water into these systems, and
  - (b) ensure appropriate maintenance of these sewers
- rather than to identify whole corridors as 'areas at risk of flooding' with consequent knock-on effects for future development (including small scale development such as house extensions) and potential impacts on property values / house insurance.

With regard to (a), the draft plan and the County Development Plan provides for the control and management of surface water from new developments<sup>1</sup> and with regard to (b) maintenance of sewers is an operational matter for the Local Authority and therefore would not form part of the criteria and requirement of the Flood Risk Guidelines.

In relation to this issue, it is recommended that the flood risk zone identified between the entrance to Delgany Wood and Mill Road should be omitted from the identified flood zones, as flooding in this area is similarly only a result of blockages in the surface water system.

- In relation to the harbour area it is noted that the flood map reflects the old harbour area and as such it is considered that a revised map should be prepared to reflect the new harbour area. Therefore the new flood map for this area will reflect the flood zone mapping contained in Appendix C, Part 10 of the Greystones Harbour Development (2011), which was prepared by ARUP consultants. In addition, after examining the flood event on the Victoria Road area, it is considered that this should be removed from the flood map as the flood event was as a result of construction works relating to nearby apartments.
- In relation to the issues regarding the maintenance, surveying and cleaning of the watercourses, this is an operational matter for the Local Authority and as such the flood zone map produced is not a guide to cleaning and maintenance; it is simply to illustrate areas prone to flooding.
- There is no reference to 'light flooding' in the draft LAP or the FRA document. There is reference

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<sup>1</sup> **TS4:** To implement flood management objectives as set out in the Wicklow County Development Plan 2010-2016 and to implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009).

**TS5:** To restrict the types of development permitted in Flood Zone A and Flood Zone B to the uses that are 'appropriate' to each flood zone, as set out in Table 3.2 of the Guidelines for Flood Risk Management (DoEHLG/OPW, 2009). Developments that are an 'inappropriate' use for a flood zone area, as set out in Table 3.2 of the Guidelines, will not be permitted, except where a proposal complies with the Justification Test for Development Managements, as set out in Box 5.1 of the Guidelines. Flood Risk Assessments shall be in accordance with the requirements set out in the Guidelines.

**TS6:** Notwithstanding the identification of an area as being at low or no risk of flooding, where the planning authority is of the opinion that flood risk may arise or new information has come to light that may alter the flood designation of the land, an appropriate flood risk assessment may be required to be submitted by an applicant for planning permission.

**SW1 (CDP):** Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks.

**SW2 (CDP):** Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system.

however to 'low' flooding in Objective TS6; however the purpose of this objective is to ensure that in areas where it has been determined that there is a 'low risk' of flooding, a flood risk assessment can still be requested of any application for development if new information has come to light that would alter this determination. The Planning Authority does not regard any flood event as 'light' - a strategic flood risk assessment was carried out in accordance with Flood Risk Guidelines and a flood map was produced. There are mitigation objectives (TS4-TS6) and objectives contained in the County Development Plan 2010-2016 (FL1-FL9) that ensures that there is sufficient protection for areas at risk of flooding.

- The Planning Regulations are a matter for National Government and the Department of Environment, Community and Local Government. The Planning Authority's role is to implement and enforce these regulations and take account of any guidelines. The new Flood Risk Guidelines for Planning Authorities clearly set out that flood risk must be assessed as part of the assessment of any planning application and these guidelines are being implemented by Wicklow County Council through the adoption of appropriate policies / objectives in development plans and through the development management process.

### **Manager's Recommendation**

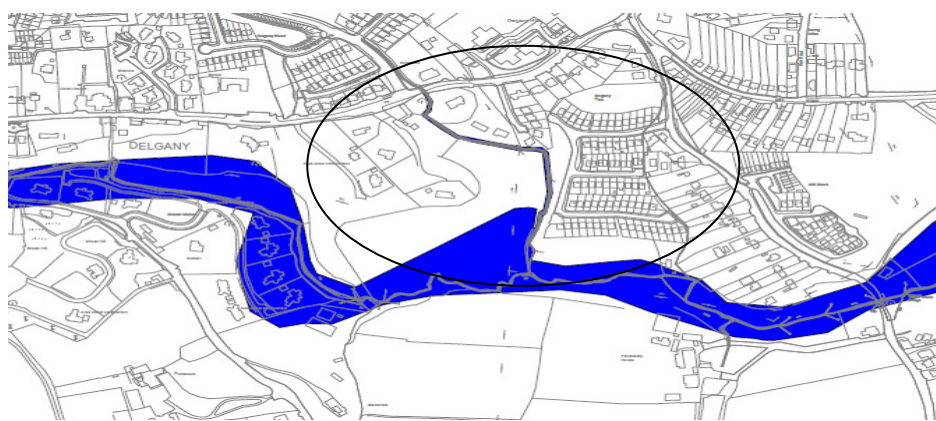
Amend the flood maps as follows

- R762 at Delgany Wood

**From:**



**To:**



- Greystones Harbour

**From:**



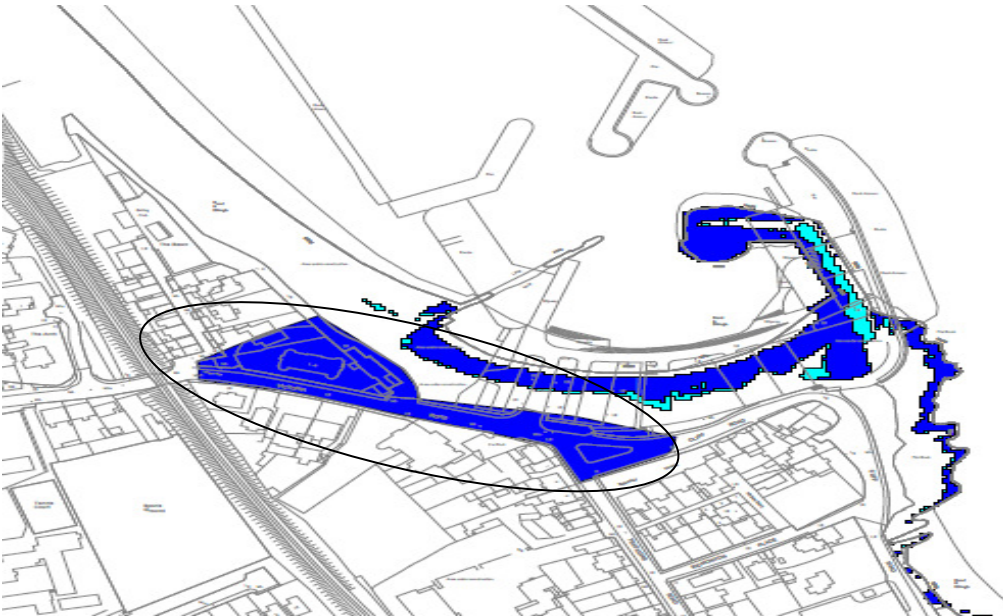
**To:**





- Victoria Road

**From:**



**To:**



### **SECTION 3: SFRA OF MANAGER'S RECOMMENDED AMENDMENTS TO THE DRAFT GREYSTONES-DELGANY AND KILCOOLE LAP 2013-2019**

This section includes a SFRA of the Manager's Recommended Amendments to the Draft Greystones-Delgany and Kilcoole LAP 2013-2019, as set out in the 'Manager's Report on Submission or Observations Received on the Draft Greystones-Delgany and Kilcoole LAP 2013-2019'.

#### **3.1 RECOMMENDED AMENDMENTS TO MAP C: INDICATIVE FLOOD ZONES**

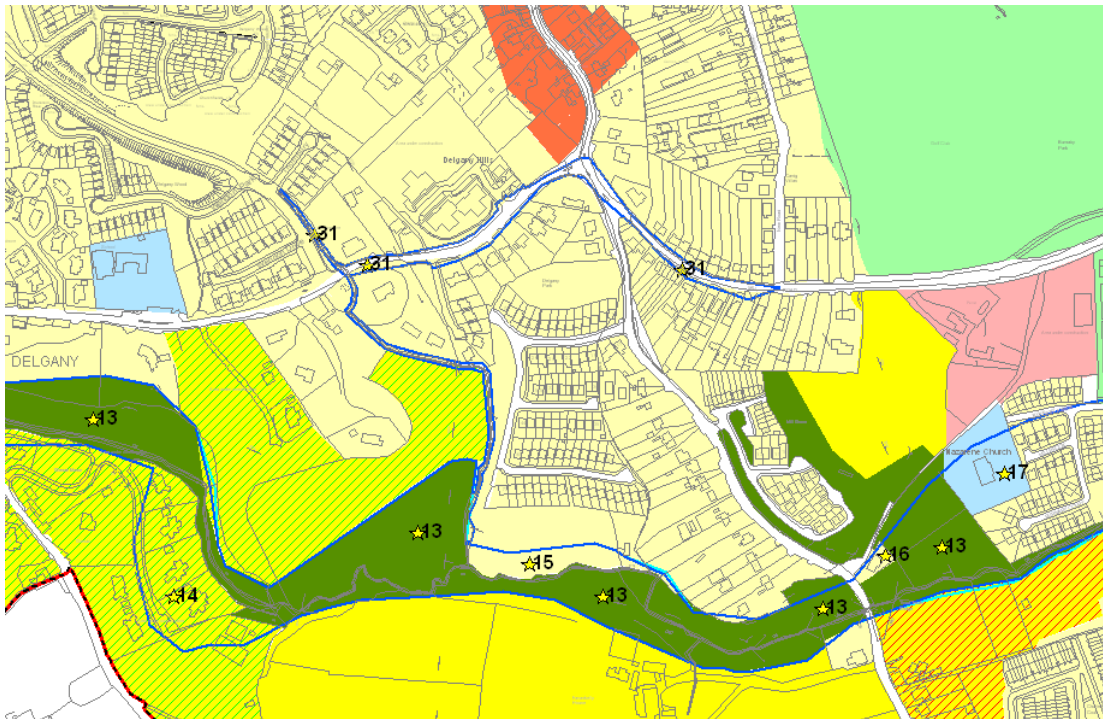
As per the Manager's recommendations, three amendments are recommended to 'Map C: Indicative Flood Zones'. These amendments have corresponding implications for Map 2: SFRA Site Assessment. The implications for the SFRA justification test are considered below.

#### **PROPOSED AMENDMENT NO. 1: R762 AT DELGANY WOOD**

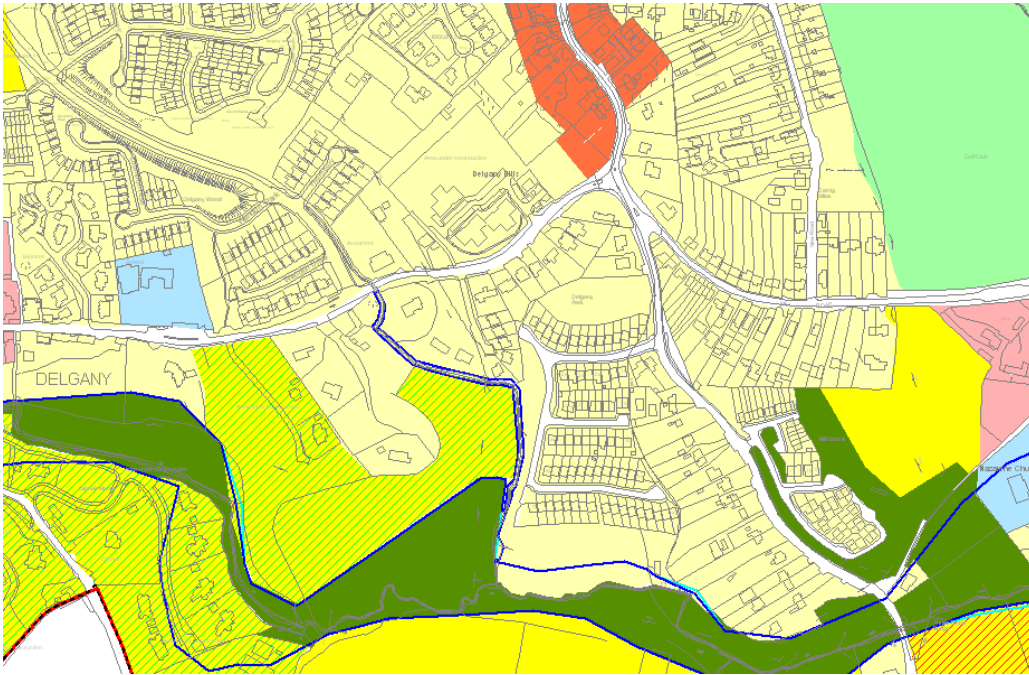
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##### **Amendment to Map 2 (SFRA: SFRA Site Assessment)**

**From:**



**To:**



#### **Flood Risk Zones and Justification Test**

This amendment omits the flood zone from along the R761 at Delgany Hills and Mill Road. Site No.31 is no longer in a flood zone area and as such the justification test is no longer required to be applied.

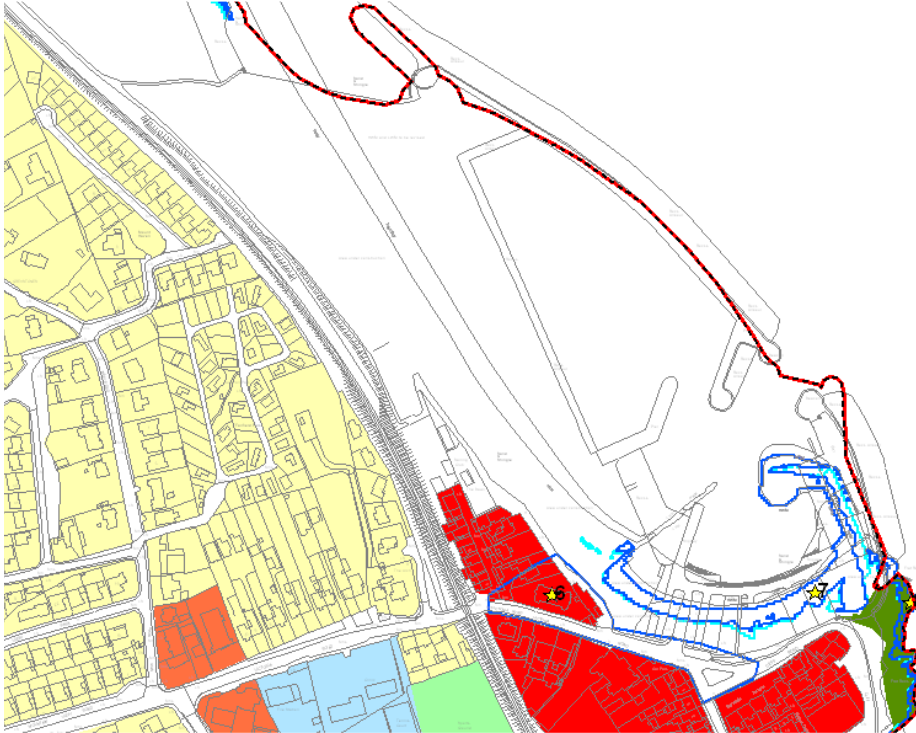


## PROPOSED AMENDMENT NO. 2: GREYSTONES HARBOUR

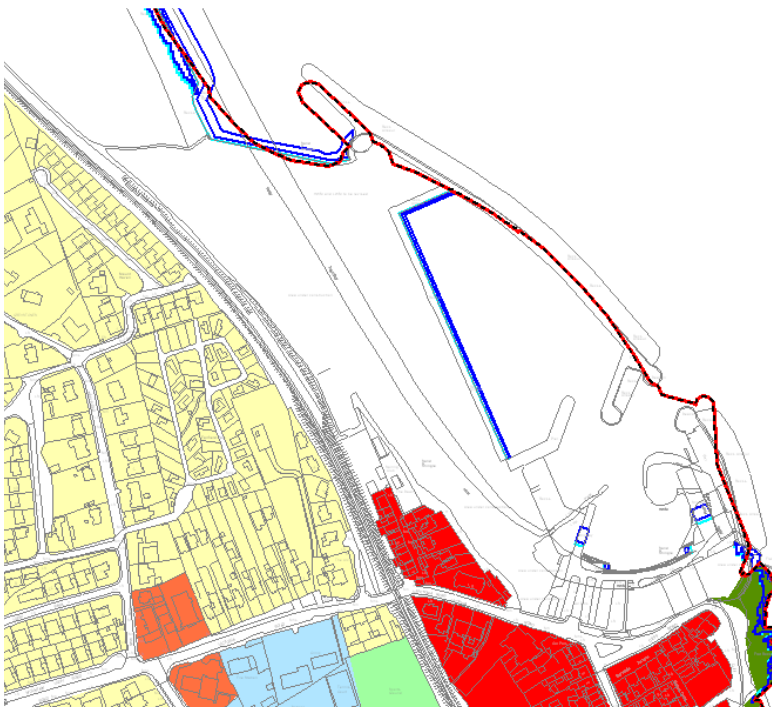
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### Amendment to Map 2 (SFRA: SFRA Site Assessment)

From:



To:



### Flood Risk Zones and Justification Test

This amendment omits a substantial part of the flood zone from the southern part of Greystones Harbour and introduces a flood zone in the vicinity of the marina. The amendments have been re-assessed in the below table. The proposed land use at this site is for a harbour development. This is an appropriate type of development for flood zone A and B areas and as such there is no requirement for a justification test.

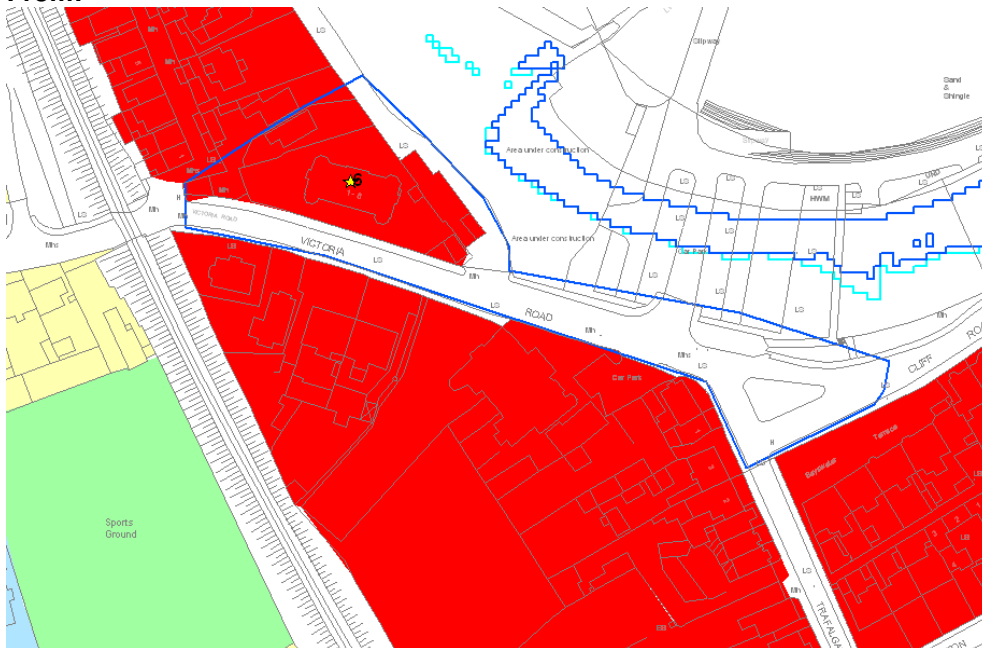
#### Site No.7

<b>Land zoning</b>	Zone 1, Greystones Harbour and North Beach Action Plan
<b>Flood Zone</b>	A and B
<b>Vulnerability of land use vs. Flood Zone</b>	Land use zoning appropriate – this land is in use as a harbour
<b>Requirement for Justification Test</b>	No

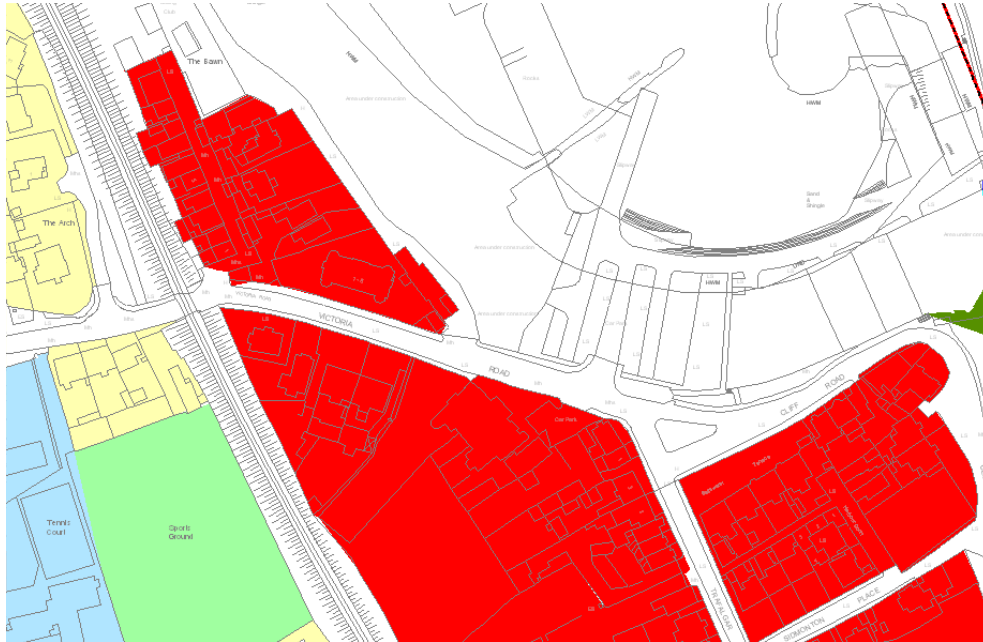
### PROPOSED AMENDMENT NO. 3: VICTORIA ROAD

#### Amendment to Map 2 (SFRA: SFRA Site Assessment)

From:



**To:**



### **Flood Risk Zones and Justification Test**

This amendment omits the flood zone from Victoria Road. Site No.6 is no longer in a flood zone area and as such the justification test is no longer required to be applied.

### **3.2 RECOMMENDED AMENDMENTS TO MAP A: LAND USE ZONING OBJECTIVES**

A number of recommended amendments relate to the land use zoning objectives as indicated in Map A. None of these proposed amendments relate to lands that are within flood zone A or B. Accordingly, all of these proposed amendments avoid flood risk and are appropriate in terms of flood risk management.

A number of recommended amendments relate to objectives for the development of new roads as indicated in Map A. All of these proposed amendments avoid flood risk and are appropriate in terms of flood risk management.

Objectives relating to the improvement of existing roads are not considered to be a significant form of development in terms of flood risk.