

Simon Musial

From: Mark Adamson <[REDACTED]>
Sent: 23 January 2019 13:53
To: RSES
Subject: Submission on the EMRA Draft Regional Spatial and Economic Strategy
Attachments: Submission on EMRA RSES - Flooding and Flood Risk - 190123.pdf

Dear Sir / Madam,

Please find attached herewith a submission from the Office of Public Works on the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly concerning flooding and flood risk management.

A copy of the attached letter is also in the post.

Regards

Mark

From: Info <info@emra.ie>
Sent: 06 November 2018 10:56
To: Mark Adamson <[REDACTED]>
Subject: Notification of the public consultation on the EMRA Draft Regional Spatial and Economic Strategy

Dear Sir/Madam,

Please find attached for your attention a notification letter and the public notice regarding the public consultation on the Draft Regional Spatial and Economic Strategy launched today by the Eastern and Midland Regional Assembly.

Kind regards,

Eastern and Midland Regional Assembly

Floor 3 North, Ballymun Civic Centre, Main Street, Ballymun, Dublin 9

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Is faoi rún agus chun úsáide an té a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil leis an seoltóir a luaithe is féidir. Ní hionann na tuairimí luaite sa ríomhphost seo agus tuairimí Tionól Reigiúnach Oirthir agus Lár - Tíre leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphost seo agus aon comhad atá nasctha leis scuabtha le bogearraí frithvórais chun vórais ríomhaire a aimsiú agus is cosúil go bhfuil siad glan. Bí cinnte an ríomhphost seo a mionscrúdú, mar ní ghlacann Tionól Reigiúnach Oirthir agus Lár - Tíre freagracht faoi aon damáiste a dhéanfaí le do chórais ríomhaireachtaí.

Email Disclaimer: <http://www.opw.ie/en/disclaimer/>

[REDACTED]

Post.



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Jonathan Swift Street
Trim
Co. Meath

Telephone 01- 6476000

23rd January, 2019

Eastern and Midland Regional Assembly
Ballymun Civic Centre
Main Street
Ballymun
Dublin 9

Dear Sir / Madam,

Re.: Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region

We refer to the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region published for consultation on 5th November 2018 and set out below our observations with regards to flooding and flood risk management.

We welcome the publication of the 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 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 ('Climate Action' Key Principle, Section 2.2; RSO 8, the inclusion of 'Option C' of the Climate Scenarios in the preferred Growth Strategy Scenario, RFRA)
- The support expressed within the Strategy for the proposed flood relief measures set out in the FRMPs (Section 4.4 - 4.8, RPO 7.13, RFRA) and the need for local authorities to take such measures into account in local planning and development management decision-making (RPO 7.14)
- The requirement for local authorities to address proper site/route selection including the examination of flooding (RPO 6.2)
- The requirements set out in relation to the application of SUDS to reduce urban storm-water flooding (RPO 10.10 - 10.12)
- The recognition of coastal erosion as a significant issue, and the requirement that land use plans shall take account of the risk of coastal erosion (RPO 7.4) that is to be considered within the context of Integrated Coastal Zone Management (RPO 7.3).
- The requirements to undertake SFRA's and Site-Specific FRAs as appropriate and apply the Guidelines on the Planning System and Flood Risk Management in future planning and development management decisions, recognising that the RFRA is at a strategic level (RPO 7.12, 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 is recognised. However, we would note 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 the exponential increase in flood risk that could arise 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. We 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 suggested that Option C under the Climate Scenarios with regards to the Growth Strategy Scenario might be more affirmative in relation to the consideration of climate change adaptation in informing settlement level policy, whereby adaptation requirements 'should' inform settlement level policy, rather than 'can'.

We note that Circular PL02/2014 is referred to within the RFRA. We would suggest 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.

We 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
Asst. Chief Engineer
Flood Relief and Risk Management Division