



Strategic Flood Risk Assessment

**Draft Claremorris Local Area Plan
2012 – 2018**

**Prepared by
Forward Planning Section
Mayo County Council**

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Section 1: Overview of the Guidelines

1.1 Introduction

Flooding is a natural process that can happen at any time in a wide variety of locations. Flooding from the sea and rivers is probably best known but prolonged, intense and localised rainfall can also cause sewer flooding, overland flow and ground water flooding. Flooding has significant impacts on human activities; it can threaten people's lives, their property and the environment. Assets at risk can include housing, transport and public service infrastructure, and commercial, industrial and agricultural enterprises. The health, social, economic and environmental impacts of flooding can cause significant and have a wide community impact.

The following documents have been used in the preparation of this assessment:

- The Planning System and Flood Risk Management, Guidelines for Planning Authorities, DoEHLG, 2009
- The Planning System and Flood Risk Management Guidelines for Planning Authorities; Technical Appendices; DoEHLG, 2009

The Planning System and Flood Risk Management Guidelines 2009 have been issued by the Minister of the Environment, Heritage and Local Government under Section 28 of the Planning and Development Act 2000, as amended. Planning Authorities and An Bord Pleanála are required to have regard to the Guidelines in carrying out their functions under the Planning Acts. They are also required to make the guidelines available for inspection by members of the public. These Guidelines supersede previous interim guidance on flooding in Appendix E to the Development Plan Guidelines in 2007.

1.2 Purpose of the Guidelines

The Planning System and Flood Risk Management Guidelines 2009 introduce comprehensive mechanisms, such as Strategic Flood Risk Management (SFRA), for the incorporation of flood risk identification, assessment and management into the planning process. Implementation of the Guidelines is achieved through actions at the national, regional, local and site specific levels.

At City and County Level:

- Planning authorities will introduce flood risk assessment as an integral and leading element of their development planning functions under the Planning Code and at the earliest practicable opportunity in line with the requirements of these Guidelines.
- The new flood risk assessment system will be aligned with the existing Strategic Environmental Assessment (SEA) process introducing processes for identifying flood risk and determining what flood risk assessment is required and carrying out such assessments similar to the overall system for screening and scoping under the SEA process.
- City and county development plans will establish the flood risk assessment requirements for their functional areas including other planning authorities such as Town Councils and any local area plans (LAP) which may be supplemented by more detailed site-specific flood risk assessment required to comply with these Guidelines.
- Planning authorities will assess planning applications for development in accordance with the provisions of these Guidelines following the guidance of their own or any OPW Strategic Flood Risk Assessment and the application of the sequential approach and, if necessary, the Justification Test required by these Guidelines.
- Planning authorities will ensure that development is not permitted in areas of flood risk, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered and the risks should be mitigated and managed through location, layout and design of the development to reduce flood risk to an acceptable level.
- Planning authorities will ensure that only developments consistent with the overall policy and technical approaches of these Guidelines will be approved and permission will be

1.3 Core Objectives of the Guidelines

The Core Objectives of the Guidelines are to:

- Avoid inappropriate development in areas at risk of flooding
- Avoid new development increasing flood risk elsewhere, including that which may arise from surface water run-off
- Ensure effective management of residual risks for development permitted in flood plains
- Avoid unnecessary restriction of national, regional or local economic and social growth
- Improve the understanding of flood risk among relevant stakeholders
- Ensure that the requirements of EU and national law in relation to all natural environment and nature conservation are complied with at all stages of flood risk management.

These Guidelines outline methodologies for the transparent consideration of flood risk at all levels of the Planning Process, ensuring consistency of approach throughout the country. The Guidelines will contribute to the avoidance of minimisation of potential flood risk through a more systematic approach within a river catchment process.

The Key Principles are to:

- Avoid risk, where possible
- Substitute less vulnerable uses, where avoidance is not possible, and
- Mitigate and manage the risk, where avoidance and substitution are not possible.

1.4 The Flood Risk Assessment Process

1.4.1 Scales Used for Flood Risk

A Flood Risk Assessment (FRA) is required at different scales by different organisations for many different purposes. A hierarchy of assessments is necessary to ensure a proportionate response to the needs of organisations by avoiding the need for detailed and costly assessments prior to making strategic decisions.

Regional Flood Risk Appraisal (RFRA)

RFRA provide a broad overview of the source and significance of all types of flood risk across a region and also highlight areas where further more detailed study will be required. At this level, they are an appraisal and not an assessment.

Strategic Flood Risk Assessment (SFRA)

SFRAs are necessary for Development Plans and Local Area Plans and provide a broad (area-wide) assessment of all types of flood risk to inform strategic land use planning decisions. SFRAs enable the local authority to undertake a sequential approach, including the Justification Test, allocate appropriate sites for development and identify how flood risk can be reduced as part of the development plan process. The level of detail will differ between plans.

Site-specific Flood Risk Assessment (Site FRA)

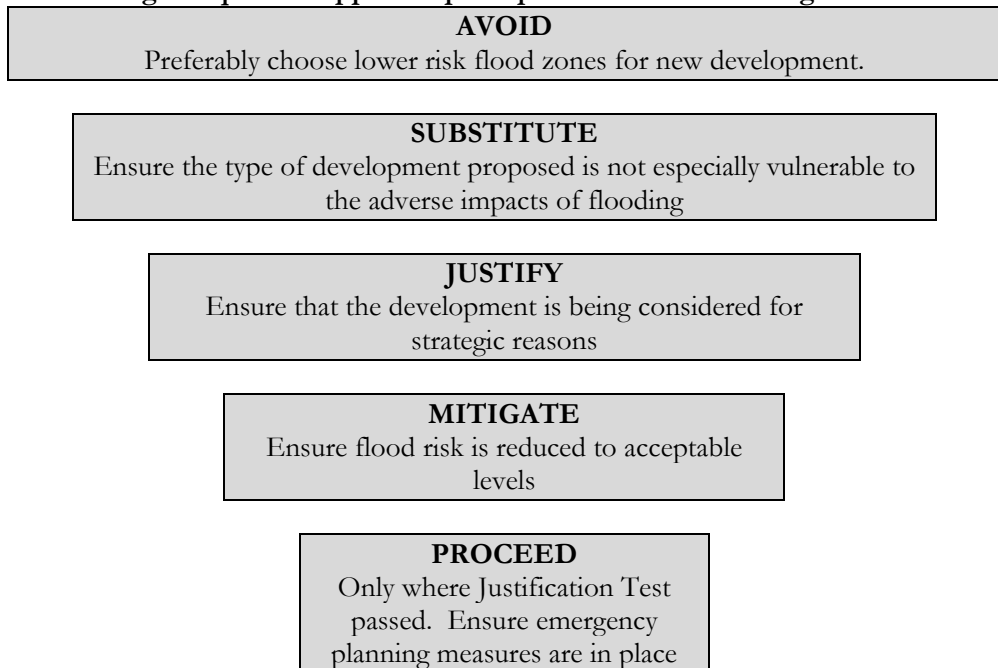
To assess all types of flood risk for a new development. FRAs identify the sources of flood risk, the effects of climate change on this, the impact of the development, the effectiveness of flood mitigation and management measures and the residual risks that remain after those measures are put in place. Must be carried out in all areas where flood risk has been identified but level of detail will differ if SFRA at development plan level has been carried out.

A Strategic Flood Risk Assessment is the level of assessment required for the Local Area Plan Level.

1.4.2 The Sequential Approach

The Sequential Approach in terms of flood risk management is based on the following principles:

Fig 1 Sequential approach principles in flood risk management



A sequential approach to planning is a key tool in ensuring that development, particularly new development, is first and foremost directed towards lands that are at low risk of flooding. The sequential approach outlined above should be applied to all stages of the Planning process, particularly at the plan making stage. Flood zones are defined in the guidelines and form a crucial element in the sequential approach.

Flood zones are geographical areas within which the likelihood of flooding is in a particular range and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning. There are three types or levels of flood zones defined for the purposes of these Guidelines:

Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding);

Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding);

Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all areas of the plan which are not in zones A or B.

The Guidelines also categorise land uses and development types into three categories:

- Highly vulnerable development (including essential infrastructure)
- Less vulnerable development
- Water compatible development.

The land uses and types of development under each category are shown in Table 1 below:

Table 1: Classification of vulnerability of different types of development

Vulnerability Class	Land uses and types of development which include*:
Highly Vulnerable Development (including essential infrastructure)	Garda, ambulance and fire stations and command centres required to be operational during flooding; Hospitals; Emergency access and egress points; Schools; Dwelling houses, student halls of residence and hostels; Residential institutions such as residential care homes, children's homes and social services homes; Caravans and mobile home parks; Dwelling houses designed, constructed or adapted for the elderly or, other people with impaired mobility; and Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution (SEVESO sites, IPPC sites, etc.) in the event of flooding.
Less vulnerable development	Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions; Land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plans; Land and buildings used for agriculture and forestry; Waste treatment (except landfill and hazardous waste); Mineral working and processing; and Local transport infrastructure.
Water-compatible development	Flood control infrastructure; Docks, marinas and wharves; Navigation facilities; Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location; Water-based recreation and tourism (excluding sleeping accommodation); Lifeguard and coastguard stations; Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms; and Essential ancillary sleeping or residential accommodation for staff required by uses in this category (subject to a specific warning and evacuation plan).
*Uses not listed here should be considered on their own merits	

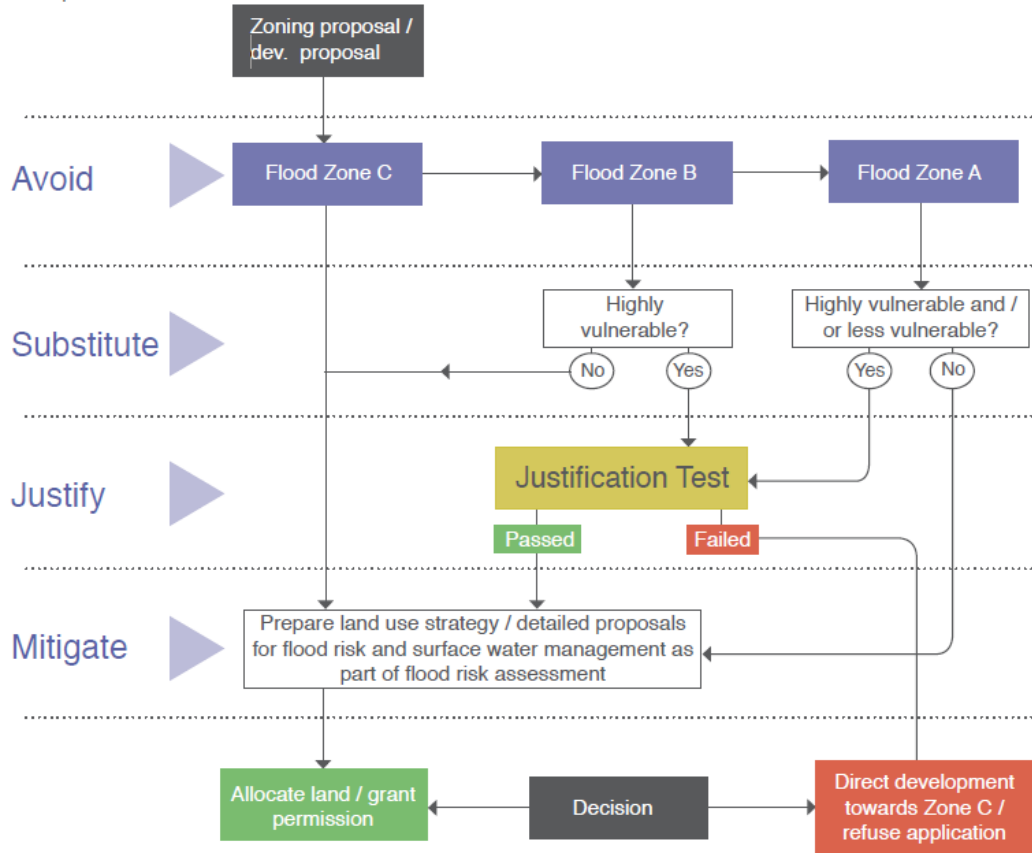
Table 2 below shows vulnerability versus flood zone to illustrate appropriate development and when to apply the Justification Test

Table 2 Vulnerability vs. Flood Zone

	Flood Zone A	Flood Zone B	Flood Zone C
Highly Vulnerable Development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less Vulnerable Development	Justification Test	Appropriate	Appropriate
Water Compatible Development	Appropriate	Appropriate	Appropriate

Figure 2 describes the mechanism for using the sequential approach in the Planning process.

Fig 2 Sequential approach mechanism in the planning process



1.4.3 The Plan Making Justification Test

The Justification Test is designed to rigorously assess the appropriateness, or otherwise, of particular developments that, for various reasons, are being considered in areas of moderate or high flood risk (JUSTIFICATION). The Plan-Making Justification Test is relevant to a Strategic Flood Risk Assessment for plans and is described as follows.

Where, as part of the preparation and adoption or variation and amendment of a development/local area plan, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 2, all of the following criteria must be satisfied:

1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, and statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
 - Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;
 - Comprises significant previously developed and/or under-utilised lands;
 - Is within or adjoining the core of an established or designated urban settlement;
 - Will be essential in achieving compact and sustainable urban growth;

- 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.
3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development 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 impacts elsewhere.

N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.

1.4.4 The Stages of a Strategic Flood Risk Assessment

A staged approach should be adopted, carrying out only such appraisal and or assessment as is needed for the purposes of decision-making at the regional, development and local area plan levels, and also at the site specific level. The stages of appraisal and assessment are:

Stage 1 Flood risk identification

To identify whether there may be any flooding or surface water management issues related to either the area of regional planning guidelines, development plans and LAP's or a proposed development site that may warrant further investigation at the appropriate lower level plan or planning application levels;

Stage 2 Initial flood risk assessment

To confirm sources of flooding that may affect a plan area or proposed development site, to appraise the adequacy of existing information and to determine what surveys and modeling approach is appropriate to match the spatial resolution required and complexity of the flood risk issues. The extent of the risk of flooding should be assessed which may involve preparing indicative flood zone maps. Where existing river or coastal models exist, these should be used broadly to assess the extent of the risk of flooding and potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures;

Stage 3 Detailed flood risk assessment

To assess flood risk issues in sufficient detail and to provide a quantitative appraisal of potential flood risk to a proposed or existing development, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures. This will typically involve use of an existing or construction of hydraulic model of the river or coastal cell across a wide enough area to appreciate the catchment wide impacts and hydrological processes involved.

Table 3 Flood Risk Assessment Stages

	Flood Risk Identification	Initial Flood Risk Assessment	Detailed Flood Risk Assessment
Regional Flood Risk Appraisal	✓	U	U
Strategic Flood Risk Assessment County Plan	✓	P	U
Strategic Flood Risk Assessment Town Plan or LAP	✓	✓	P
Site-specific Flood Risk Assessment	✓	✓	✓

P	Probably needed to meet the requirements of the Justification Tests
U	Unlikely to be needed
✓	Required to be undertaken

1.4.5 Key Outputs from the SFRA

The Key outputs are:

- To provide for an improved understanding of flood risk issues within the Development Plan and development management process, and to communicate this to a wide range of stakeholders;
- To produce an assessment of existing flood defence infrastructure and the consequences of failure of that infrastructure and to identify areas of natural floodplain to be safeguarded;
- To produce a suitably detailed flood risk assessment that supports the application of a sequential approach in key areas where there may be tension between development pressures and avoidance of flood risk;
- To inform, where necessary, the application of the Justification Test;
- To conclude whether measures to deal with flood risks to the area proposed for development can satisfactorily reduce the risks to an acceptable level while not increasing flood risk elsewhere;
- To produce guidance on mitigation measures, how surface water should be managed and appropriate criteria.

2.1 Introduction

2.2 Stage 1 Flood Risk Identification

2.2.1 Office of Public Works

As part of the National Flood Risk Management Policy, the OPW developed the www.floodmaps.ie web based data set which contains information concerning historical flood data and displays related mapped information and provides tools to search for and display information about selected flood events. There are no flood events recorded within the Claremorris LAP area on the www.floodmaps.ie website.

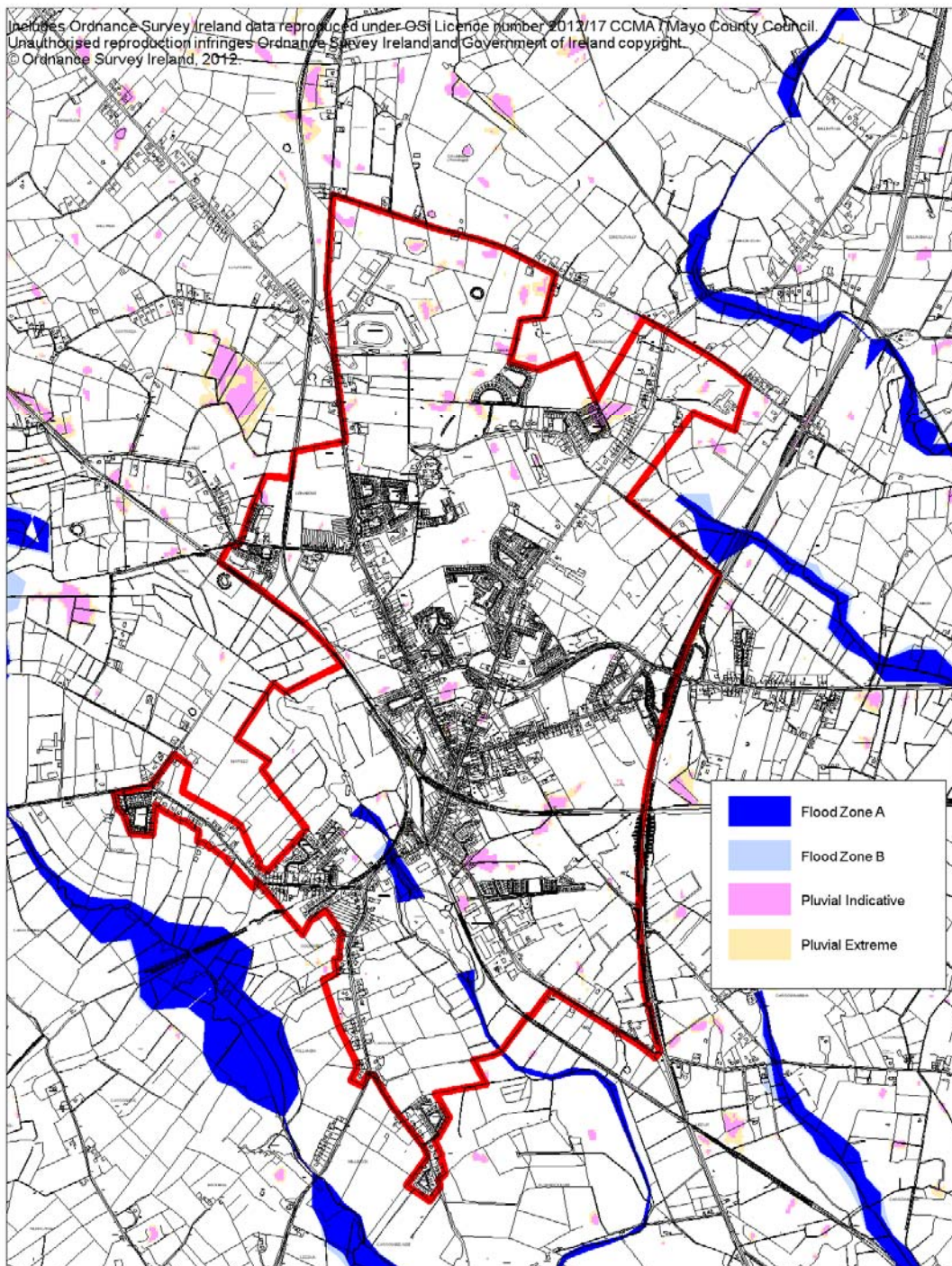
University of Wisconsin-Madison
City of Madison, Wisconsin

Benefiting Lands

Map 1 shows the location of all benefitting lands within and adjoining the LAP boundary

Draft Preliminary Flood Risk Assessment Maps are now available from the OPW. Map 2 shows the PFRA data for the Claremorris LAP.

Map 2: Draft Preliminary Flood Risk Assessment Map



The Draft PFRA maps indicate that there are both Fluvial (river flooding) and Pluvial (surface Water) events in and adjoining the LAP boundary.

The OPW will have flood hazard mapping by the end of 2013 and Flood Risk Management Plans by the end of 2015.

2.2.2 6" (1:10560) Ordnance Survey Maps

6" Ordnance Survey maps include areas which are marked as being "Liable to Floods" the exact areas are not delineated but give an indicative indication of areas which have undergone flooding in the past. The OS maps associated with the draft LAP indicate areas 'Liable to Flood' around Clare Lough.

2.2.3 Aerial Photography

Aerial photography from the Ordnance Survey does not give any indications of flooding events at this location.

2.2.4 Public Consultations / Local Authority Personnel

As part of the Plan making process, a public consultation day was held for members of the public to highlight any relevant issues. No issues relevant to flooding within the LAP area were highlighted.

2.2.5 Other Sources of Information

The guidelines give a list of other possible sources of information that may be available for the indication of flood risk events for the LAP area. This is not an exclusive list and other sources may be available. There are no other sources of information to indicate flood events for the draft IWAK LAP.

2.3 Stage 2 Initial Flood Risk Assessment

Following Stage 1 Flood Risk Identification, if the planning authority considers that there is a potential flood risk issue, it should move onto Stage 2. The purpose of the initial FRA is to ensure that all relevant flood risk issues are assessed in relation to the decisions to be made and potential conflicts between flood risk and development are addressed to the appropriate level of detail.

2.3.1 Assessment of Flood Risks Identified for Claremorris

The main flood risks identified for Claremorris are determined in Section 2.2 above. The main risk is from Fluvial which is classified as Flood Zone A and Flood Zone B on Map 2 above. These are generally around the Mayfield and Clare Lakes. Other sources of flooding in the LAP area are generally from the Pluvial – Extreme category. Pluvial flooding can be defined as flooding which results from rainfall generated overland flow and / or ponding which may occur during or immediately after intense rainfall events, before the runoff enters any water course or sewer.

The Flood Risk Guidelines recommend that areas within Flood Zone A or Flood Zone B should be zoned appropriately, which is for amenity and open space. All other areas are considered Flood Zone C and under the sequential approach all development proposals would be considered appropriate.

The next stage of the sequential approach is the mitigation stage which is to prepare the land use strategy for flood risk and surface water management.

2.3.2 Land Use Strategy for the Draft IWAK LAP

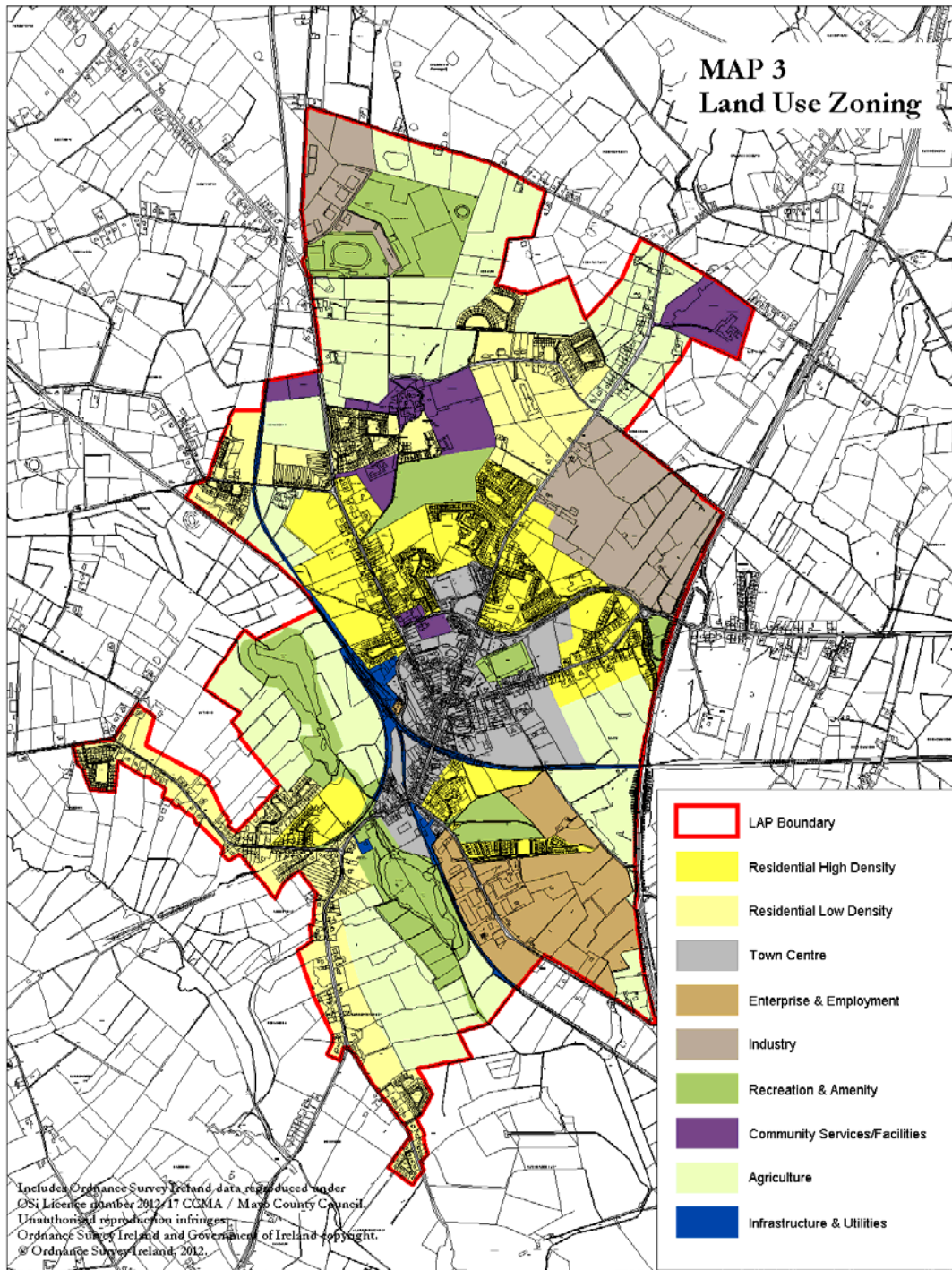
Map 3 below indicates the proposed land use zoning that will be included in the draft Claremorris Local Area Plan. The Zoning objectives are as follows:

Land Use Objective	Flood Risk Assessment
Residential High Density	
To protect the amenity of existing residential areas and provide further lands primarily for residential areas and	All Land Zoned Residential High Density are located on lands classified under Flood Zone C. The sequential approach outlined above allows for

<p>provide further lands primarily for residential development at appropriate densities and ancillary facilities</p> <p>Residential Density up to 20 houses/Ha</p>	<p>all land uses considered appropriate for this zoning objective.</p> <p>Some areas of land zoned Residential High Density have indicated some Pluvial events and some are located on benefitting lands. The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below.</p>
Residential Low Density	
<p>To protect the amenity of existing residential areas and provide further lands primarily for residential areas and provide further lands primarily for residential development at appropriate densities and ancillary facilities</p> <p>Residential Density up to 5 houses/Ha</p>	<p>All Land Zoned Residential Low Density are located on lands classified under Flood Zone C. The sequential approach outlined above allows for all land uses considered appropriate for this zoning objective.</p> <p>Some areas of land zoned Residential Low Density have indicated some Pluvial events and some are located on benefitting lands. The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below.</p>
Town Centre	
<p>To maintain and enhance the vitality, viability and environment of the town centre and provide for appropriate town centre uses</p>	<p>All Land Zoned Town Centre are located on lands classified under Flood Zone C. The sequential approach outlined above allows for all land uses considered appropriate for this zoning objective.</p> <p>Some areas of land zoned Town Centre have indicated some Pluvial events. The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below</p>
Enterprise & Employment	
<p>To provide for light industrial and appropriate commercial development</p>	<p>All Land Zoned Enterprise & Employment are located on lands classified under Flood Zone C. The sequential approach outlined above allows for all land uses considered appropriate for this zoning objective.</p> <p>Some areas of land zoned Enterprise & Employment have indicated some Pluvial events and some are located on benefitting lands. The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below.</p>
Industry	
<p>to provide for high quality business/technology park type uses in a high quality industrial environment.</p> <p>.</p>	<p>All Land Zoned Industry are located on lands classified under Flood Zone C. The sequential approach outlined above allows for all land uses considered appropriate for this zoning objective.</p> <p>Some areas of land zoned Industry have indicated some Pluvial events and some are located on benefitting lands. The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below.</p>

Recreation & Amenity	
To provide lands for recreation and amenity purposes.	<p>Recreation & Amenity land uses are considered appropriate to lands classified within Flood Zone A. Therefore the only land classified as flood zone A within the LAP boundary is zoned for Recreation & Amenity uses.</p> <p>Some areas of land zoned Industry have indicated some Pluvial events and some are located on benefitting lands. The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below.</p>
Community Services/Facilities	
To provide land for community and social facilities	<p>All Land Zoned Community Services / Facilities are located on lands classified under Flood Zone C. The sequential approach outlined above allows for all land uses considered appropriate for this zoning objective.</p> <p>Some areas of land zoned Community Services / Facilities have indicated some Pluvial events The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below.</p>
Agriculture	
To reserve lands for agricultural and rural uses and to preserve the amenity of the town setting	<p>All Land Zoned Agriculture are located on lands classified under Flood Zone C. The sequential approach outlined above allows for all land uses considered appropriate for this zoning objective.</p> <p>Some areas of land zoned Agriculture have indicated some Pluvial events and some are located on benefitting lands. The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below.</p>
Infrastructure & Utilities	
To provide land for public infrastructure and public utilities	<p>All Land Zoned Infrastructure & Utilities are located on lands classified under Flood Zone C. The sequential approach outlined above allows for all land uses considered appropriate for this zoning objective.</p> <p>Some areas of land zoned Infrastructure & Utilities are located on benefitting lands. The Sequential Approach recommends mitigation in this instance. Mitigation measures have been included in the LAP and are outlined below.</p>

Map 3: Land Use
Zoning



2.3.3 Flood Risk and Surface Water Management.

The land use zoning strategy has been prepared to avoid and manage any flood risk that has been identified for the area. The draft LAP sets out policies, objectives and best practice approaches to mitigate against any further risk from flooding as a result of and arising from development of the area.

The draft Local Area Plan includes the following objectives in relation to surface water management, water conservation and flooding issues:

IO5	It is an Objective of the Council to support measures to raise public awareness of the value of the water resources by encouraging conservation, reuse and protection of water, in addition to the elimination of wastage of water through waste-water detection and enforcement of repairs and to replace deficient sections of pipe work where necessary
IO6	It is an Objective of the Council to ensure surface water systems are managed in a sustainable manner by encouraging the re-use of surface water where possible and to require that all new development proposals to connect to the surface water sewer or to provide surface water drainage systems designed in accordance with Sustainable Urban Drainage Systems (SuDS), as appropriate
EPO5	It is an Objective of the Council to comply with the EU Floods Directive 2007/60/EC and S.I. No. 122/2010: European Communities (Assessment and Management of Flood Risks) Regulations
EPO6	It is an Objective of the Council to protect areas prone to flooding within the LAP area from inappropriate development and to ensure that all new developments do not result in an increased risk of flooding within the site or on other lands. All new development proposals within or close to flood risk areas shall submit a flood risk assessment which should incorporate flood protection and mitigation measures, as appropriate (See Section 6.8)

Section 6.8 of the LAP relates to flooding as follows

A Site Specific Flood Risk Assessment shall be required for all planning applications that are:

- in or within 50m of Flood Zone A and Flood Zone B
- in or within 10m of both the Pluvial Indicative and Extreme events
- in or within 25 of Benefitting Land

A Site Specific Flood Risk Assessment may, as appropriate, be required in other situations as the need arises.

2.3.4 Flooding Outside of the IWAK LAP

The draft Preliminary Flood Risk Assessment map indicates flooding events outside the Draft Local Area Plan boundary. These are mainly categorised as fluvial events, reliant to watercourses. It is considered that the implementation of the draft LAP will not contribute further to these events.

2.4 Conclusion

As a result of the Flood Risk Identification; the Initial Flood Risk Assessment (Stages 1 & 2); the application of the sequential approach outlined in the Planning System and Flood Risk Management, Guidelines for Planning Authorities, DoEHLG, 2009 and The Planning System and Flood Risk Management Guidelines for Planning Authorities; Technical Appendices; DoEHLG, 2009; and the incorporation of mitigation measures into the Draft LAP, it is not considered necessary to subject the Draft Claremorris LAP to Stage 3 Detailed Flood Risk Assessment.