



Forward Planning
Planning Department,
Leitrim County Council,
Áras an Chonate,
Carrick-on-Shannon,
Co. Leitrim,

12/05/2026

RE: Proposed Variation No. 1 to the Leitrim County Development Plan 2023-2029

Dear Sir/Madam,

The OPW, as lead agency for the coordination of an integrated, 'whole-of-Government' approach to flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation No. 1 to the Leitrim County Development Plan 2023-2029.

This submission is made specifically concerning flood risk management. Further submissions on the proposed variation may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines' and the preparation of a Strategic Flood Risk assessment (SFRA).

Nature-based Solutions and SuDS

The OPW advises that the preparation of development plans should take account of the opportunities for nature-based solutions to reduce runoff and provide other benefits such as to water quality, biodiversity, etc. This can include in areas around existing developments, as well as within existing and proposed development in the form of Sustainable Urban Drainage Systems (SuDS). Leitrim County Council should refer to The Best Practice Interim Guidance Document 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas', as well as the Guidance Document for Planners, Developers and Developer Agents 'Implementation of Urban Nature-based Solutions' for further guidance.

The Guidelines recommend that the Strategic Flood Risk Assessment provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Map Review Programme

Flood Mapping produced under the National CFRAM Programme is currently under review at Mohill. Updated mapping is at post consultation and due to be published in the coming months. The OPW requests that Leitrim County Council note that mapping in Mohill may



change as part of the review process. The latest information and update status of map reviews is available at www.floodinfo.ie/map-review.

Proposed Amendment No. 29

Amendment no. 29 proposes rezoning lands at Drummagh in Carrick-on-Shannon from less vulnerable Agriculture to highly vulnerable New Residential. EPA flow network data indicates a possible watercourse passing adjacent to the lands. This watercourse appears not to have met the criteria for inclusion in either the National CFRAM or the National Indicative Fluvial Mapping (NIFM) programme, and therefore the OPW does not have flood extents associated with this potential source of risk.

The Guidelines set out a three Stage Flood Risk Assessment process for the Planning Authorities to identify whether flood risk may exist, and the degree to which it is an issue, and what assessment to a scale proportionate to the risk should then be carried out. The following is an overview of this three-stage process;

Stage 1 Flood risk identification – To identify whether there may be any flooding or surface water management issues related to a plan area or proposed development sites that may warrant further investigation.

Stage 2 Initial flood risk assessment – To confirm sources of flooding that may affect a plan area or proposed development sites, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve preparing indicative Flood Zone maps. Where hydraulic models exist, the potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment should be scoped.

Stage 3 Detailed flood risk assessment – To assess flood risk issues in sufficient detail to prepare Flood Zone maps based on a quantitative appraisal of potential flood risks to a proposed or existing development or to land that is being considered for zoning, and to identify potential impacts on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

Where unmapped watercourses occur, a stage 1 assessment would indicate a potential source of flooding that may warrant further investigation. A stage 2 appraisal of the adequacy of existing information might indicate that there is sufficient information available to either assess that fluvial risk is not present (e.g. a surface water feature misclassified as a watercourse), or that fluvial risk is present and that there is sufficient information available to assess and classify the level of risk (e.g. evaluation of site-specific flood risk assessments accepted by Leitrim County Council for the area provides sufficient information for the establishment of flood zones). If however assessment indicates risk is present, but insufficient information is available to establish flood zones, a stage 3 detailed flood risk assessment may be required.

Leitrim County Council should review if a stage 3 flood risk assessment is required to inform the land use zonings and the SFRA. An evaluation of site-specific flood risk assessments may also assist with establishing flood zones.



Original Zoning at
Drummagh

Proposed Rezoned
lands following
Amendment No. 29

Unmodelled watercourse
adjacent

Consideration of Climate Change Impacts

Table 1.1 in section 1.2 of the SFRA notes existing County Development Plan Flood Risk Management measures. Policy FRM POL 13 from Chapter 9, Infrastructure and Energy is included which is as follows: *“To require that Strategic Flood Risk Assessments and site-specific Flood Risk Assessments shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019, and the guidance on potential future scenarios contained therein, shall be consulted with to this effect.”* While it is recognised that this is a reference to a measure in the County Development Plan, OPW Commentary on the consultations for both draft County Development Plan and the material alterations to same recommended removal of reference to the superseded 2009 guidance. Furthermore, it might be noted that the latest Flood Risk Management Climate Change Sectoral Adaptation Plan was published in 2025.

The variation proposes the following amendment to section 9.8 ‘Flood Risk Management’ of the plan: *“Uses on lands associated with the mid-range and high-end future climate scenario risk areas on Variation No. 1 sites within Ballinamore, Dromod, Manorhamilton and Mohill as identified in Appendix I of the SFRA Addendum shall be limited to less vulnerable or water compatible uses. This limitation shall take primacy over any other related land use zoning provision”.* It may be beneficial if the zoning boundaries were amended to reflect the restrictions on development, or if this requirement were strengthened by inclusion as a policy objective.

If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) prior to the completion of the Variation to the Leitrim County Development Plan.

Yours sincerely,

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments