

# STRATEGIC FLOOD RISK ASSESSMENT ADDENDUM REPORT

Draft Athy Local Area Plan 2021-2027



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Addendum Report  
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## Contents

1	INTRODUCTION .....	1
2	PROPOSED MATERIAL ALTERATIONS STUDY AREA .....	2
3	SUMMARY .....	9

## Tables

Table 2-1	Proposed material alterations which have flood risk implications .....	3
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## Figures

Figure 2-1	Proposed Material Alterations relating to Land Use Zoning .....	2
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## Appendices

Appendix A	Land Use Zoning Map Material Alterations Athy FRA Overlay .....	10
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# 1 INTRODUCTION

The Draft Athy Local Area Plan 2021-2027 (Draft LAP) was placed on public display from Thursday 17<sup>th</sup> December 2020 to Monday 8<sup>th</sup> February 2021 (inclusive of additional 9 days for Christmas closure). The Chief Executive's Report on submissions and observations received in respect of the Draft LAP was submitted to the Members of Athy Municipal District for their consideration on 19<sup>th</sup> March 2021.

Having considered the Draft Athy Local Area Plan and the Chief Executive's Report, it was resolved by the Members at a Special Meeting of Elected Members of the Athy Municipal District on Friday 23<sup>rd</sup> April and Monday 26<sup>th</sup> April 2021 to alter the Draft Athy Local Area Plan, and that these alterations constitute a material alteration to the Draft LAP.

KCC commissioned RPS Consulting Engineers to carry out an Addendum to the Strategic Flood Risk Assessment report, in accordance with the requirements of The Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014) referred to hereafter as "The Guidelines". This report reviews the proposed Material Alterations and their impact on flood risk and makes recommendations for inclusion in the final SFRA report.

## 2 PROPOSED MATERIAL ALTERATIONS STUDY AREA

Forty-six proposed material alterations have been proposed but not all of these are relevant to the SFRA and flood risk management. **Table 2-1** below outlines a summary of the proposed material alterations which have flood risk implications and how they apply to the Guidelines. The final SFRA will be updated with commentary, recommendations and amended Justification Tests from this addendum report. **Figure 2-1** shows the Proposed Material Alterations relating to Land Use Zoning.



Figure 2-1 Proposed Material Alterations relating to Land Use Zoning

**Table 2-1 Proposed material alterations which have flood risk implications**

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
3	Insert the following new objective after objective CSO1.2 and renumber subsequent objectives accordingly: CSO1.3 Provide for serviced sites with appropriate infrastructure in accordance with Objective 18(b) of the National Planning Framework (2018), as denoted on Map Ref. 6 Land Use Zoning Map.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Athy LAP and Kildare County Development Plan.	The final SFRA will be updated to note that the development in this area is suitable.
7	Insert an additional sub-objective under objective UCRO1.10 as follows: (v) Investigate the feasibility of the development/redevelopment of the backlands of the town centre area of Athy in conjunction with the formulation of the Public Realm Strategy.	No material impact as the zonings for the town centre has not changed, however any future development should be assessed in accordance with the Guidelines.	The final SFRA will be updated to note that any of investigation of the development backlands should be compliant with the Guidelines, follow the sequential approach and avoid development in flood zones.
22	Replace Walking and Connectivity Measures WN18 with proposed connectivity measure WN18a in Table 7.1 Walking and Connectivity Measures and Map Ref. 1.1 Movement and Transport (Walking and Connectivity Measures), as follows: Link to provide for an additional access point to Ardscoil na Trionoide.	Sections of the proposed Strategic Connectivity Route adjacent to the Whitecastle Lawns residential estate do lie within Flood Zones A and B. The proposed SCR also lies within in areas of potential for increased flood risk due to climate change. Therefore, during the planning and design stage of the SCR, an appropriately detailed FRA should be carried out to assess the suitability of the SCR and also the impact of the proposed SCR on the flood risk in the area. Cycling/walking routes such as this are development types that can be compatible with flood zones. They must however give due consideration to their influence on the river and not generate an increased flood risk to the surrounding or downstream areas.	The SFRA does not require any material change to address this proposed material alteration. General development in the Athy should follow the requirements of the Guidelines and the LAP policies and objectives to manage flood risk appropriately.
27	Amend text of objective GI.1.7, as follows: GI1.7 (a) Maintain a biodiversity protection zone of 60 metres from the top bank of the River Barrow (including all areas covered by the River Barrow and River Nore SAC), 20 metres from the canal and not less than 10	This is a positive change which helps to protect the flood zones adjacent to the River Barrow and prevent encroachment on them and also the river itself. This policy objective in tandem with policy objective IO3.5 in proposed material	The final SFRA will include the updated policy objective GI1.7. The final SFRA will be also updated to include reference to this positive approach which helps to protect the

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
	<p>metres from the top bank of smaller watercourses, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities. Strategic green routes and trails will be open for consideration within the biodiversity protection zone, subject to appropriate safeguards and assessments.</p> <p>(b) Ensure that any development on the lands zoned 'H: Industrial and Warehousing' located adjacent to the River Barrow at Townparks incorporates an appropriately landscaped riparian zone to seamlessly integrate with the lands to the south and east, which are subject to the development of a masterplan under objective OS1.8. Proposed Material Alteration to include any consequential amendments to the Plan, including the denotation of objective G11.7(B) on Map Ref. 5 Strategic Open Space Map.</p>	<p>amendment 34 will ensure that the natural floodplains of the River Barrow are protected to prevent any potential flood risk impact to the surrounding and downstream areas.</p>	<p>natural floodplains of the River Barrow.</p>
31	<p>Insert the following new objective after objective IO2.3 and renumber subsequent objectives accordingly: IO2.4 Ensure that the capacity and efficiency of the national road network drainage regimes will be safeguarded for national road drainage purposes</p>	<p>This is a positive change to effectively manage surface water runoff within the LAP boundary.</p>	<p>The SFRA does not require any material change to address this proposed material alteration. General development in the Athy should follow the requirements of the Guidelines and the LAP policies and objectives to manage flood risk appropriately.</p>
32	<p>Insert the following new section after Section 10.3.1 Section 10.3.2 Site Specific Flood Risk Assessment All development proposals taking place in areas that KCC have applied a Justification Test, where a residual flood risk remains, should be supported by an appropriately detailed SSFRA. The level of detail within the FRA will depend on the risks identified and the land use proposed. Applications should apply the use of the sequential approach in terms of the site layout and design and, in satisfying the Justification Test (where required), the proposal must demonstrate that appropriate mitigation and management measures are</p>	<p>This is a positive change, see comments below for proposed material change no.34 as the principal of this text change in the LAP written statement is reinforced by the inclusion of the policy objective IO3.5 which is the subject of proposed material change no. 34.</p>	<p>The final SFRA will include the updated policy objective IO3.5. The final SFRA will be also updated to include reference to this positive approach which ensures compliance with the Guidelines.</p>

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
	<p>put in place. The development should ensure that no encroachment onto, or loss of, the flood plain shall occur. Only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site. For any development in flood risk areas that meet the Development Plan Justification Test, a Development Management Justification Test must then be applied. Development must satisfy all of the criteria of the Development Management Justification Test as per Box 5 1 of the Flood Risk Management Guidelines. This chapter provides a broad overview of the requirements of FRAs which should accompany planning applications.</p>		
33	<p>Amend the following objective: IO3.2 Ensure development proposals within the areas where KCC have applied a Justification Test and where residual flood risk remains as outlined on the Flood Risk Map (Map Ref. 2) are the subject of a Site-Specific Flood Risk Assessment, appropriate to the nature and scale of the development proposed.</p>	<p>This is a positive change which makes it clearer to applicants when an FRA is required.</p>	<p>The final SFRA will include the updated policy objective</p>
34	<p>Insert the following new objective after objective IO3.4: IO3.5 Ensure that all development proposals apply the sequential approach in terms of the site layout and design and, in satisfying the Justification Test (where required), the proposal shall demonstrate that appropriate mitigation and management measures are put in place. The development proposals should ensure that no encroachment onto, or loss of, the flood plain shall occur. Only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site.</p>	<p>This is a positive change which reinforces utilisation of the sequential approach from the Guidelines for sites in Athy. It promotes the principal of avoidance as the first priority. It also ensures development should be avoided in flood zones and developments should designate any flood zones within the site as open space, therefore avoiding encroachment on them which would reduce the available natural flood storage for the area.</p>	<p>The final SFRA will include the updated policy objective. The final SFRA will be also updated to include reference to this positive approach which ensures compliance with the Guidelines.</p>
35	<p>Insert new Map Ref. 2a which illustrates Flood Risk Zones and SSFRA overlaid on the LAP Land Use Zoning Map (Map Ref. 6 Land Use Zoning Map).</p>	<p>This is a positive change which makes it clearer to applicants when an FRA is required.</p>	<p>The final SFRA will include the updated policy objective. The final SFRA mapping will be updated to identify the areas where a SSFRA is</p>

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
			required. An updated map is shown in <b>Appendix A</b> . (Note the zoning changes proposed as part of the material alternations are not shown on this map but accepted material alterations will be included on the final Flood Zone map.)
37	Amend Map Ref. 6 Land Use Zoning Map to designate Etex lands 'H: Industrial and Warehousing' (see Map 10 at end of Report). Proposed Material Alteration to include any consequential amendments to the Plan.	The change in zoning does not change the vulnerability of the zoning with respect to the Table 3.1 of the Guidelines. The proposed zoning is considered less vulnerable development. This is no material change to the content of the SFRA as the analysis will be the same as the existing zoning is also considered less vulnerable development.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
38	Amend Map Ref. 6 Land Use Zoning Map to include lands (as outlined in red on map below) the west of the Etex Ireland campus as 'H: Industrial and Warehousing'. Proposed Material Alteration to include any consequential amendments to the Plan	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Athy LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
39	Amend the zoning designation on Map Ref. 6 Land Use Zoning Map for the site occupied by the former St. Patrick's National School (as outlined in red on the map below) on St. John's Lane from 'E: Community and Educational' to 'A: Town Centre'.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Athy LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such. This will require a minor alternation to Justification Test for the town centre to ensure this zoning is included in the test.
40	Amend the zoning designation on Map Ref. 6 Land Use Zoning Map on the lands, as outlined in red on Map 4 below, from 'F: Open Space and Amenity' to 'A: Town Centre'. Proposed Material Alteration to include any consequential amendments to the Plan.	This zoning change will reduce the open space area adjacent to the town centre, however, there is no fluvial risk identified in this area. Any development in this area will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Athy LAP and Kildare	The zoning change is deemed suitable and the final SFRA will be updated to note as such.

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
		County Development Plan to ensure there is no increase in surface water runoff by removing the green space.	
41	Amend the zoning designation on Map Ref. 6 Land Use Zoning Map for the sites (as outlined in red on map below) from 'F: Open Space and Amenity' to 'B: Existing Residential/Infill' as per KCC Plan Ref. 15/1144. Proposed Material Alteration to include any consequential amendments to the Plan.	This zoning change will reduce the open space area in this area, however there is no fluvial risk identified for the area. Any development in this area will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Athy LAP and Kildare County Development Plan to ensure there is no increase in surface water runoff by removing the green space.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
42	Amend Map Ref. 6: Land Use Zoning Map by amending the land use zoning objective on the extent of lands as outlined in KCC Plan Ref. 18/184 from 'B: Existing Infill/Residential' to 'F: Open Space and Amenity' (as outlined in red on map below). This amendment shall also include the lands included in folio KE1140 that are not already zoned 'F: Open Space and Amenity'. Proposed Material Alteration to include any consequential amendments to the Plan.	This is a positive change which will protect an existing open space area and ensure that no inappropriate development is carried out on.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
43	Amend Map Ref. 6: Land Use Zoning Map by retaining the area identified by Submission No. 43 in the Chief Executive's Report on the Submissions Received to the Draft Athy Local Area Plan 2021 – 2027 (dated 19th March 2021) as existing residential zoning (as outlined in red on map below). Proposed Material Alteration to include any consequential amendments to the Plan.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Athy LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
44 (a)	Amend Map Ref. 6: Land Use Zoning Map by changing the proposed 'Q: Employment and Enterprise' land use zoning designation to 'R: Retail' on the land identified by Submission No. 55 in the Chief Executive's Report on the Submissions Received to the Draft Athy Local Area Plan 2021 – 2027 (dated 19th March 2021). Proposed	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Athy LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
	Material Alteration to include any consequential amendments to the Plan.	This area was already assessed in the draft SFRA and was deemed suitable for development from a flood risk management perspective.	
45	Amend Map Ref. 6: Land Use Zoning Map by retaining the area identified by Submission Nos. 42, 50 and 54 in the Chief Executive’s Report on the Submissions Received to the Draft Athy Local Area Plan 2021 – 2027 (dated 19th March 2021) to provide for 50% of the area to be retained as existing residential lands (‘B: Existing Residential / Infill’) and the remaining 50% of the lands adjacent to the Ardrew Key Development Area to the north, be designated as ‘F: Open Space and Amenity’ (see lands outlined in yellow in Map 6 below). Proposed Material Alteration to include any consequential amendments to the Plan.	The zoning overlaps with a small portion of Flood Zone B. The Flood Zone B area should be designated as open space. This follows the sequential approach. This zoning change will also reduce the open space area in this area, any development in this area will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Athy LAP and Kildare County Development Plan to ensure there is no increase in surface water runoff by removing the green space.	The area of land which is proposed to be zoned B - Existing Residential/Infill, that is located within an area identified as a Flood Risk Assessment Zone, under proposed material alteration no. 45 shall be zoned F - Open Space and Amenity or shall be used for open space purposes only within any permitted residential development as part of the overall landholding

### 3 SUMMARY

RPS have reviewed the proposed material alterations with respect to the Guidelines and analysis is provided in **Table 2-1** above. We conclude that the proposed alterations are deemed suitable from a flood risk management perspective. The final SFRA report will be updated with commentary on the flood risk for proposed changes. **Appendix A** shows the Land Use Zoning Map overlaid with the proposed material alterations, the flood zones and also where a SSFRA is required.

**Appendix A**  
**Land Use Zoning Map**  
**Material Alterations Athy FRA Overlay**



- Legend :**
- Local Area Plan Boundary
  - County Boundary
  - Town Centre Regeneration Area
  - CSO Settlement Boundary 2016 (centered on middle line)
  - A: Town Centre [M2]
  - B: Existing / Infill Residential [R2.6]
  - C: New Residential [R1.6]
  - E: Community and Education [S1, 2, 6]
  - F: Open Space and Amenity [G4, 6]
  - H: Industry and Warehousing [C2.2]
  - I: Agricultural [P1]
  - L: Leisure & Amenity [C5]
  - N: Neighbourhood Centre [M3]
  - R: Retail [C1.1]
  - Q: Enterprise and Employment [C3]
  - SR: Strategic Reserve
  - U: Transport and Utilities [N]
  - Athy Distributor Road
  - River / Canal / Lakes
  - Distance from Town Centre (at 400m intervals)
  - Athy Flood Risk Assessment Zone
  - Flood Risk Zone A (Low Probability)
  - Flood Risk Zone B (Medium Probability)

Stage	Date	Description
Material Alterations	27/04/2021	Report on Material Alterations and Motions received
Material Alterations	01/04/2021	Report on Material Alterations and Motions received
Submissions	10/03/2021	Chief Executive's Report
Draft	17/12/2020	Draft Plan

**Land Use Zoning Map**  
 Material Alterations - Athy FRA Overlay

Scale: N.T.S. Map Ref.: 6

Date: March 2021 Drawing No.: 200/20/1105

Drawn by: M O'Loughlin  
 Checked by: L Crawford  
 Approved by: D Jordan

This drawing is to be read in conjunction with the written statement



Proposed Material Alteration shown thus



Laois County Council