

**Forward/Strategic Planning Section,
Economic Development Directorate,
Limerick City & County Council,
Merchants Quay,
Co. Limerick.**

Re: Proposed Material Alterations to the Draft Croom Local Area Plan 2020 - 2026

Dear Sir/Madam,

The Office of Public Works (OPW) welcomes the opportunity to comment on the above named alterations. OPW have previously made comment on the Draft Croom LAP in August 2019 (and previously in 2017 and 2015) and the result of the most recent comments have been read in the CE Report. Further consultation has taken place between OPW and Limerick City & County Council since the August 2019 submission was made.

Observations on the Draft Plan and Flood Risk Issue Report:

OPW note that under Section 50 of the Arterial Drainage Act 1945 the *'Commissioners of Public Works consent is required in order to construct any new bridge or alter, reconstruct, or restore any existing bridge/culvert on any watercourse or otherwise than in accordance with plans previously approved of by the Commissioners'*. OPW note that Section 50 consent has been sought and now approved for a new bridge for the distributor road crossing the River Laskiltagh. Separate consent under Section 50 of the Act is likely to be required for other structures on the minor channels currently located under the path of the proposed distributor road in future.

While the receiving area has been modelled the distributor road cuts directly through, and will have an impact on the flowing flood plain in future. It is imperative that in the creation of the new distributor road that the risks to properties on adjacent lands upstream and downstream are fully and comprehensively considered and modelled and assurances provided that the design of any structures hold sufficient conveyance capacity (including an allowance for blockage and climate change) to convey flood waters without impacting on existing properties in the Croom area.

It is noted as a conclusion in the 'Flood Risk Issue Report', following copious investigation in the area by six different sets of Consulting Engineers with expertise in the field, that water-compatible development is the only suitable zoning type for the area investigated. Concern remains that even though this conclusion was reached that there are currently three sites, one of which classed as a highly vulnerable development, where construction is in progress or planning is granted for future construction. A portion of all three of these sites have been shown to be in Flood Zones A or B in the past by almost half of the consultants, others say there is no risk based on their analysis. FFLs of these buildings should be designed to a sufficient level

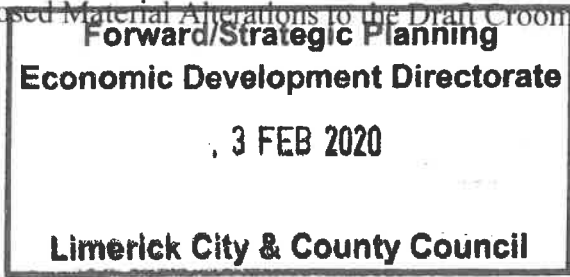


to provide them 'fail safe' protection in future as an accurate conclusion cannot be drawn from the plethora of analysis from multiple sources with varying flow rates (and levels of assessment) over many years.

Yours Sincerely,

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3rd February 2020



(/en)

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Proposed Material Alterations to the Draft Croom Local Area Plan 2020-2026

VIEW(EN/SUBMISSION/LCC-C20-CR02-1) EDIT(EN/NODE/599/EDIT) REVISIONS(EN/NODE/599/REVISIONS)

Consultation:

Material Alterations to the Proposed Croom Local Area Plan 2020 -2026 (/en/consultation/material-alterations-proposed-croom-local-area-plan-2020-2026)

Author: *Office of Public Works (/en/users/karen-donovan)*

Unique Reference Number: *LCC-C20-CR02-1*

Date Created: *03.02.2020 - 1:12pm*

Submission:

Proposed Material Alterations to the Draft Croom Local Area Plan 2020-2026

Status: *Submitted*

Date Submitted: *03.02.2020 - 1:15pm*

No. of documents attached: *0*

Boundaries Captured on Map: *No*

Cover Letter

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Observations

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Chapter:

Written Statement Alterations/Additions to Local ... (/en/consultation/material-alterations-proposed-croom-local-area-plan-2020-2026/chapter/written-statement-alterationsadditions-local-area-plan)

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