



**Senior Executive Officer,  
Planning Department,  
Carlow County Council,  
Athy Road,  
Carlow.**

21<sup>st</sup> March 2022

**RE: Material Alterations to the Draft Carlow County Development Plan 2022-2028**

Dear Sir/Madam,

The Office of Public Works (OPW), as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Material Alterations to the Draft Carlow County Development Plan 2022-2028.

This submission is made specifically with regards to flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines'. Further submissions on the draft Plan may be made by the OPW with regards to the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the following amendments that address OPW comments on the draft plan:

- Proposed amendment numbers 41 and 42 clarifying policy SWP2 and adding new policies SWP5 and SWP6
- Proposed amendment number 47 which clarifies the text in objective FR02 to ensure that zoning or development supports and does not impede the progression of flood relief schemes
- Proposed amendment number 56 committing to adopt a new SuDs policy/guidance document during the lifetime of the plan
- The correction to [www.floodinfo.ie](http://www.floodinfo.ie) as the OPW repository for historic flood events
- Amendments 107, 115, 120, 123, 126, 133, 136, 141, 145, 149, 153, 161, and 162 which incorporate mitigation measures outlined in Justification Tests into the plan by way of policy objectives.

**Specific Settlements**

**Carlow**

Alteration number 112 zones a previously un-zoned area in Flood Zones A and B as less vulnerable *Industrial*. As part of the updated SFRA, a Plan Making Justification Test has been carried out for this alteration, which has not been passed. The OPW recommend not zoning land for vulnerable uses in flood risk areas that have not passed a Justification Test.

**Ballon**

A Plan Making Justification Test has been carried out for the *Community & Education* zoned lands at the Garda station and the mitigation measures outlined have been incorporated into the plan in amendment number 123. This Justification Test has been passed on the basis that any future development must be subject to an FRA which must specifically address, among other items, that the sequential approach be applied and any extension of the Garda station must not encroach into Flood Zone A or B. It is noted that the lands in Flood Zone A and B are currently undeveloped lands between the Garda Station and river. Consideration might be given to altering the wording in the amendment to clarify that this applies to any highly vulnerable development in Flood Zones A or B, and any less vulnerable development in Flood Zone A.

### **Leighlinbridge**

Plan Making Justification Tests have been carried out for the *Enterprise & Employment, Community & Educational* and *Tourism* zoned lands, and the mitigation measures outlined have been incorporated into plan via amendment number 120.

These contain errors as follows:

- Part 1 of the Justification Tests for *Enterprise & Employment* and *Community & Educational* refers to the settlement as Ballon
- Part 1 of the Justification Test for *Tourism* refers to the settlement as Borris
- Part 2 of the Justification Test for *Enterprise & Employment* refers to the zoning as *Existing Residential*

Among other items, the mitigation measures outlined for the *Enterprise & Employment* zoned lands set out that for any future development “*the sequential approach should be applied*”. It would be beneficial if this text were clarified to highlight that less vulnerable development is not appropriate in Flood Zone A.

If further information or input is required, please do not hesitate to contact the OPW ([floodplanning@opw.ie](mailto:floodplanning@opw.ie)) in advance of the completion of the Draft Carlow County Development Plan 2022-2028.

Yours Sincerely,



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**pp Conor Galvin**

**Flood Risk Management – Climate Adaptation and Strategic Assessments**