



Forward Planning Section,  
Planning Department,  
Carlow County Council,  
Athy Road,  
Carlow.

**Re: Proposed Variation No.3 of the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018**

Dear Sir/Madam,

The Office of Public Works (OPW) welcomes the opportunity to comment on the Proposed Variation and provide the following comments. Strong commitments in relation to the Planning System and Flood Risk Management Guidelines are set out under the objectives set out previously including O09, CO10 and ENV P17 to ENV P20 and it is noted that these are not changing as part of the proposed variation.

Pg.12 Proposed Variation 3(b) one of the bullet points states an objective 'To promote residential development through active land management and a coordinated planned approach to developing appropriately zoned lands at key location, including regeneration areas, vacant sites and under-utilised areas'. The amendment might benefit from a new core strategy relating directly to flood risk as follows (or similar)

- 'The key principles as set out in the Planning System and Flood Risk Management guidelines (and associated circulars) and the sequential approach used to ensure appropriate zoning and development decisions are made and adequately justified as appropriate.' would be beneficial.

Pg.12 note the objective 'Lands previously zoned for housing but not required during this plan period will be rezoned, de-zoned and designated as strategic reserve and may be re-visited as part of the review process relating to the Joint Spatial Plan'.

- While this comment is not specific to the proposed variation, OPW note that new information is available with respect to flood risk since the previous Carlow Development Plan was published. OPW would encourage a review of lands previously zoned and currently at flood risk be reviewed as part of the new development plan and associated Strategic Flood Risk Assessment.

Pg.14 sets out the approach to be taken to 'Vacant Residential and Regeneration Lands' under the Urban Regeneration and Housing Act 2015. The responsible assessment of these zonings should be carried out in line with the Planning System and Flood Risk Management Guidelines and flood risk assessment to an appropriate level of detail and justification tests provided should any of these lands be at risk of flooding.



Pg.15 ENVP50 details the Councils' policies with regard to Climate Change. OPW have recently completed a public consultation on the 'Climate Change Sectoral Adaptation Plan for Flood Risk Management (2019-2024)' the Council should be aware of this document and may choose to reference it in this section if considered appropriate.

While a balanced view of land use and flood risk should be taken, it considers that this can be achieved in full compliance with the Guidelines. OPW welcomes Carlow County Council's commitment to adhere to these Guidelines. For further information please refer to the Planning System and Flood Risk Management Guidelines and/or contact OPW for further information.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Karen Donovan', written over a horizontal line.

**Karen Donovan**

**Engineering Services Administration**

**28<sup>th</sup> January 2020**