



Planning Department,
County Buildings,
Athy Road,
Carlow,
Co. Carlow.

31/05/2024

RE: Material Alterations to Draft Carlow-Graigucullen Joint Urban Local Area Plan 2024-2030

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Material Alterations to the Draft Carlow-Graigucullen Joint Urban Local Area Plan for the period 2024 – 2030.

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

The OPW welcome the consideration given to OPW commentary at draft plan stage.

National Indicative Fluvial Mapping

The OPW commentary on the draft plan noted text included in the SFRA that the national indicative fluvial mapping dataset had been used as an initial screening tool for flood extents and should be reviewed as part of site specific FRAs. It was noted that SSFRAs should not use NIFM as a data source, and instead should carry out their own detailed assessment. This text has not been updated at material alteration stage.

Material Alterations

Material Alteration 63 rezones undeveloped lands in Flood Zone B from water compatible Open Space and Amenity to highly vulnerable New Residential. Highly vulnerable development is not appropriate in Flood Zone B unless all criteria of the plan making justification test can be satisfied. As set out in section 8.8 of the SFRA, these lands cannot pass the plan making justification test as they are not within or adjoining the core, and development should be limited to extensions, renovations and change of use.

If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Draft Carlow-Graigucullen Joint Urban Local Area Plan 2024-2030.



Yours sincerely,

A handwritten signature in black ink, appearing to read 'Conor Galvin', written over a solid horizontal line.

Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments