



**The Senior Planner,  
Planning Department,  
Kilkenny County Council,  
County Hall,  
John Street,  
Kilkenny**

**20/01/2021**

**RE: Graiguenamanagh/Tinnahinch Draft Joint Local Area Plan 2021 - 2027**

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 Graiguenamanagh/Tinnahinch Draft Joint Local Area Plan for the period 2021 – 2027.

The OPW welcomes the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the ‘Guidelines’ and the proposed measures set out in the Flood Risk Management Plans (FRMPs) based on the work undertaken for the CFRAM Programme, and the preparation of a Strategic Flood Risk assessment (SFRA). In particular, the OPW welcomes:

- The commitment to address surface water flooding issues and the need for SuDS (Objectives INFO2.1 and INFO2.2)
- The commitments to managing flood risk in line with the Guidelines and the measures set out in the FRMPs (Objectives INFO3.1 – 3.4).

The following comments highlight opportunities for the Draft Plan before it is finalised.

***Flood Relief Scheme***

Objective INFO3.1, to support and co-operate in delivering the Graiguenamanagh-Tinnahinch Flood Relief Scheme, is welcomed by the OPW. The project team sent a letter titled “Graiguenamanagh-Tinnahinch Flood Relief Scheme Progress Update” to Kilkenny and Carlow County Councils on 18<sup>th</sup> December 2020.

***Consideration of Climate Change Impacts***

The potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.



Reference might also be made under Objective INFO3.2 to the consideration of the potential impacts of climate change as part of the application of the Guidelines.

### ***Sustainable Drainage Systems (SuDS)***

The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites.

The Guidelines recommend that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

### **Specific Sites in the SFRA**

#### ***Area 9: Duiske Abbey Graiguenamanagh***

The commitment in the SFRA to provide a proviso within the Plan that Highly Vulnerable developments will not be permitted could not be found.

#### ***Area 11: Existing Residential West of R703***

The commitment in the SFRA to provide a proviso within the Plan that no additional housing should be provided at this location could not be found.

#### ***Area 13: Mixed Use West of Fairview Graiguenamanagh***

A justification test has been provided for this area. No separate FRA has been supplied to further assess the flood risk and the potential effects of flooding on the site and in surrounding areas due to the development of the area. A site specific FRA is not considered in itself to be a mitigation measure, and Kilkenny and Carlow County Councils might consider providing further guidance on the measures considered acceptable in the area. Mitigation measures could include setting minimum floor levels, flood resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events, as well as flood protection / mitigation, subject to consideration of the impacts of such measures elsewhere.

#### ***Area 15: Existing Residential North of R703***

The commitment in the SFRA to provide a proviso within the Plan, that no additional housing should be provided at this location, could not be found.

#### ***Area 16: Existing Residential East of R705***

The commitment in the SFRA to provide a proviso within the Plan, that no additional housing should be provided at this location, could not be found.



***Area 17: Existing Residential Fairview***

The commitment in the SFRA to provide a proviso within the Plan, that no additional housing should be provided at this location, could not be found.

***West of R703 Tinnahinch***

There is an area of *Mixed Use* zoning, boarding the *Open Space/Biodiversity* lands, which is located in Flood Zone A. Highly Vulnerable and Vulnerable development is considered inappropriate in Flood Zone A, unless the criteria of a Plan-making Justification Test can be satisfied and the flood risk mitigated.

***The Quay Graiguenamanagh***

There is a vacant site at the road junction between Barrow Lane and The Quay. The site is zoned for *Mixed Use* and is located in Flood Zone A. Highly Vulnerable and Vulnerable development is considered inappropriate in Flood Zone A, unless the criteria of a Plan-making Justification Test can be satisfied and the flood risk mitigated.

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 Graiguenamanagh/Tinnahinch Draft Joint Local Area Plan 2021 – 2027

Yours sincerely,

A handwritten signature in blue ink, which appears to read 'Mark Adamson', is placed over a light blue rectangular background.

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**PP Mark Adamson**  
**Flood Relief and Risk Management Division**