

## [Office of Public Works]

I refer to the request for submissions regarding the draft National Planning Framework, "Ireland 2040 - Our Plan(NPF). The Office of Public Works (OPW) supports the development of the framework and recognises that the framework will guide national, regional and local planning and investment decisions for the years ahead.

The comments and observations made here by the OPW in response to this national consultation complement our prior input and contribution to the NPF Environmental Steering Group through the State Architect Mr. Ciaran O'Connor.

The OPW welcomes the emphasis in the high-level objectives within the NPF (Section 1.5) on sustainability, quality of life and the need to plan for future change. The consideration and effective management of flood risk is a significant factor in the achievement of each of these objectives.

Severe and wide-spread flood events over recent years, along with the assessments undertaken through the National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme, have provided evidence of the degree and spatial scope of flood risk as a national issue. Climate change projections indicate that flooding will affect greater areas and with more frequent and severe flood events into the future.

In this context, the OPW acknowledges the inclusion of the text in Section 8.3 underlining the importance of the implementation of the guidelines on the Planning System and Flood Risk Management (2009), and in particular the inclusion of National Policy Objective 58, that address this key issue for sustainable planning and development management.

The OPW also welcomes the recognition that the co-ordinated approach involving Local authorities, DHPLG, OPW and other relevant Departments and agencies working together to implement the recommendations of the CFRAM programme will ensure that flood risk management policies and infrastructure are progressively implemented.

The OPW notes the reference to flooding, the need to link the implementation of the 'Floods' Directive with the planning process and the desired outcome of co-ordination in the implementation of the recommendations of the CFRAM Programme under the proposed National Strategic Outcomes related to 'Sustainable Management of Water and other environmental Resources' (Section 9.3). Maintaining the high degree of co-ordination and information exchange between the OPW, DHPLG and the planning authorities is central to continued sustainable planning and development management with regards to flood risk into the future.

The OPW also acknowledges that a Strategic Flood Risk Assessment has been undertaken, and notes that this has informed the preparation of the NPF.

In addition to the above general observations, the OPW would have the following specific comments:

**Section 3.9:** The inclusion of the degree of flood risk in Cork City, and of the progression of the Lower Lee Flood Relief Scheme has to be set in a context that flood risk is a significant issue in each of the five cities and also other large urban areas, and that the risk in these population centres is likely to increase significantly into the future as a result from the projected rise in sea levels and greater intensity of rainfall events. The flood risk for cities has been mapped by the CFRAM programme and is expected to be published in the coming

months. The Lower Lee Flood relief Scheme is advancing informed by the CFRAM Programme.

While further investment in flood protection may help manage the level of risk in the face of rising sea levels and increasing urban storm water flooding, it is important that future development be cognisant of the risk and that the principles of the Guidelines on the Planning System and Flood Risk Management, that advocate avoidance in the first instance, be adopted to promote sustainable development and safe communities into the future. In that context, National Policy Objective 58 is an important consideration.

**Section 4:** While flood risk is typically concentrated in large urban areas, at a household and community-level it can have equally devastating impacts in rural areas and in smaller towns and villages. In such areas, it would typically also be more difficult to retrospectively address new flood risks in an economically viable manner should such risks arise from inappropriate development. As such, the recognition of flood risk and the application of the principles of the Guidelines are important in the rural context as well as the urban.

**Section 6.4:** The OPW welcomes National Policy Objective 43b. The projected rise in sea levels due to climate change would increase the extent of flood-prone areas and the frequency and severity of flood risk in existing risk areas. The OPW would promote avoidance as an adaptation response, whereby, in the first instance and where possible, only appropriate development might be promoted in areas that are projected to be subject to flooding or an increased likelihood or severity of flooding in the future

**Section 7.5:** It may be considered important to acknowledge that flood risk management is co-ordinated in trans-boundary areas.

**Section 8.3:** The OPW welcomes the principle of the National Policy Objective 58. To more fully capture the flood risk management objectives set out in the Guidelines (2009) the OPW would propose a small amendment to this objective and would propose the following revised wording:

Ensure the consideration of flood risk informs place making by avoiding inappropriate development in areas at risk of flooding or that could increase flood risk elsewhere, and that residual risks are appropriately managed, including through SUDS and other sustainable urban water management solutions, in accordance with the Guidelines on the Planning System and Flood Risk Management.

## **Comments in relation to Estate Management**

**Section 7.4:** OPW welcomes reference to the importance of telecommunications networks. Consideration however might be given to making specific reference to the increasing importance of major data centres, and the need for such centres to be seen as a critical component of public and private sector infrastructure.

On the issue of tourism, consideration might be given to specific reference being made to the extensive portfolio of heritage assets – visitor sites, castles, woodlands, islands – under the management of the Office of Public Works and the role it can play in the further expansion of both the tourist and film industry.

**Section 8.3:** OPW as the owner and manager of some of the most prominent and historic Parks, woodlands and historic properties in the country welcomes the recognition in this NPF, of the role that such properties can play in the future development of this country. In particular the clear connection made between our natural heritage and the future growth in tourism and visitor experience is noted.

**Section 9.2:** The OPW, through its leadership role in the implementation of the Government's **Property Asset Management Delivery Plan**, has put in place a structure that allows for a greater integration and utilisation of the State's overall property portfolio. Agreed protocols, now in place, have also established the ground rules for a greater sharing of these State assets.

The OPW welcomes National Policy Objective 69 that envisages a more centrally adopted view of all State property assets and appreciates this opportunity to submit our observations and looks forward to the production of the finalised framework.

Vincent Campbell

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