



Forward Planning Section,
Land Use Planning & Transportation Department,
County Hall,
Tallaght,
Dublin 24

24/09/2025

RE: Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028
Draft Clondalkin Local Planning Framework

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028 (Draft Clondalkin Local Planning Framework).

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

Flood Zones

It is set out in Section 3.2.6 of the SFRA that the 1% AEP and 0.1% AEP high end future scenario outlines are used to define the flood zones for Clondalkin. This is consistent with flood zones in the county development plan for South Dublin. While the OPW welcomes that South Dublin County Council has applied a precautionary approach to climate change, it might be noted that Flood Zones are defined on the basis of current risk, as set out in Section 2.24 of the Guidelines, Flood Zones *“are based on current assessment of the 1% fluvial and the 0.1% fluvial events and the 0.5% and 0.1% tidal events, without the inclusion of the climate change factors”*. South Dublin County Council should consider including the present day flood risk mapping for Clondalkin to demonstrate the current predicted flood risk.

Justification Tests

Similarly to the flood zones the requirement for justification tests is based on present day flood risk. Plan-making justification tests have been supplied for the opportunity sites which are not at risk of flooding currently but could be in the future. There is no requirement for justification tests for these lands if there is no present day flood risk.

No plan-making justification tests have been supplied for existing zonings that are at risk of flooding such as *Town Centre (TC)*, *Village Centre (LC)* and *Residential (RES)*. The Department of Environment, Community and Local Government Circular PL 2/2014 provides further advice and detail to planning authorities on older developed areas located in Flood Zone A and B. *“Where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non-structural measures to manage the flood risk”*

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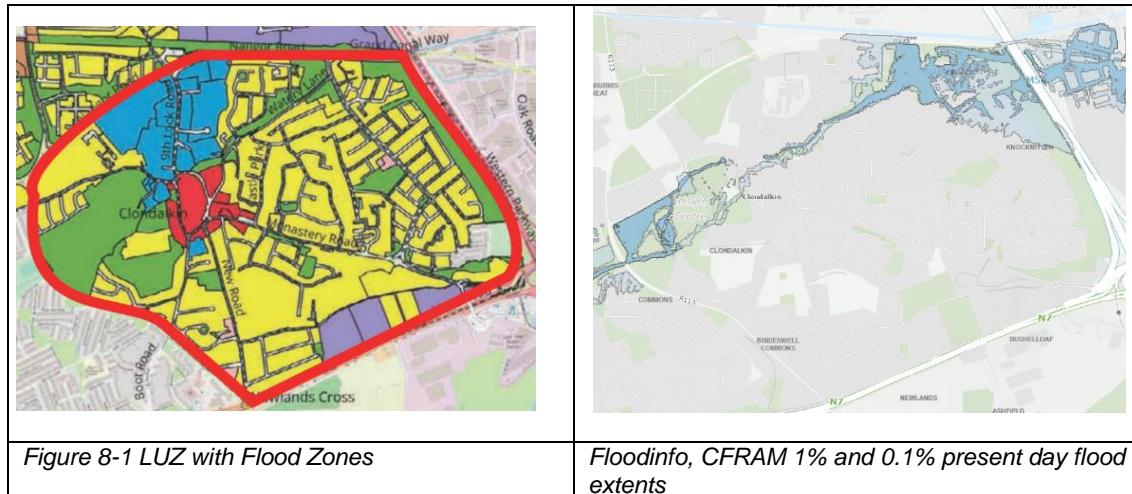
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structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced”.



Existing Defences

Section 8.2 Review of Opportunity Sites states that “*Clondalkin benefits from existing defences on the Camac towards the north of the settlement*”. There are existing defences in Gallastown on the other side of the M50 but these defences are downstream from Clondalkin and would not reduce the flood risk to the area. The area that benefits from these defences can be viewed in the National CFRAM pdf maps. If South County Council know of other defences these should be listed in a register of defences in the SFRA.

Camac Flood Alleviation Scheme

The OPW welcomes CA9 Objective 3 to support the delivery of the scheme and Objective VF5 – old Nangor Road Flood Risk “*Ensure that no new development takes place within the flood plain of the Camac River at the Old Nangor Road until such time as the measures required as part of the Camac Flood Alleviation Scheme are known.*”

Consideration of Climate Change Impacts

The OPW welcomes the discussion on climate change in the SFRA. South Dublin County Councils have established the flood zones by adopting the high end future scenario flood extent mapping, by this future risk has been reviewed.

Nature-based Solutions and 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, and also 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. There are a number of opportunity sites where further guidance on the likely applicability of different SuDS techniques for managing surface water run-off may be considered. Some of these sites are adjoining each other, and South Dublin County Council could provide guidance for



integrated and area based provision of SuDS and green infrastructure that are appropriate in order to avoid reliance on individual site by site solutions.

References are made to The Best Practice Interim Guidance Document 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas' including in the justification tests, this document aims to promote the use of long-term and plan-led approach to nature-based solutions with spatial planning. Further Guidance on nature-based solutions can be found in the recently published 'Implementation of Urban Nature-based Solutions Guidance Document for Planners, Developers and Developer Agents'.

Proposed Pedestrian Footbridge

The Clondalkin Local Transport Plan proposes a new pedestrian footbridge over the River Camac, it should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.

As there is a Flood Alleviation Scheme underway for the River Camac it is essential that South Dublin County Council liaise with the project team regarding this proposed bridge.

If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) prior to the completion of the Variation to the South Dublin County Development Plan.

Yours sincerely,

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pp Conor Galvin
Flood Risk Management – Climate Adaptation and Strategic Assessments