



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

22/01/2026

RE: Proposed Material Alterations to 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 Material Alterations to 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 material alterations may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

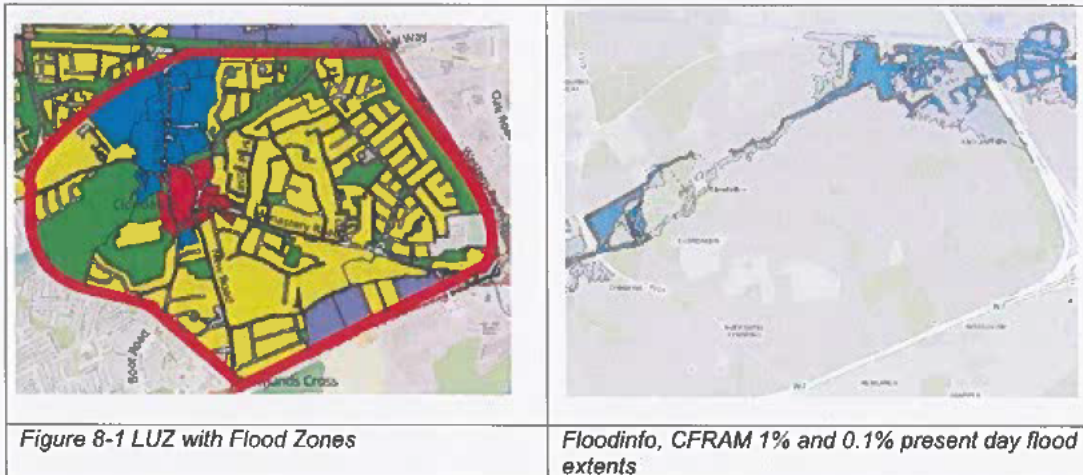
Flood Zones

The OPW welcomes South Dublin County Council intention to also include the present day flood risk mapping for Clondalkin to demonstrate the current predicted flood risk.

Justification Tests

The clarification for providing justification tests for the opportunity sites which are not at risk of flooding currently but could be in the future is welcomed by the OPW.

The OPW had previously commented on the variation that *"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 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"*. This comment has not been addressed in the proposed material alterations.



Nature-based Solutions and SuDS

The OPW welcomes in the inclusion of stormwater management sections for each opportunity site. Within these proposed new sections it indicates the appropriate measures for each site and where integrated and area-based provision of SuDS and green infrastructure can be incorporated.

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,

[Redacted signature]

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments