



Forward Planning Section,
Planning and Transport,
South Dublin County Council
County Hall,
Tallaght,
Dublin 24
D24A3XC

20/08/2026

RE: Proposed Material Alterations to Proposed Variation No. 3 to the South Dublin County Development Plan 2022-2028: City Edge Strategic Urban Regeneration Framework 2026

Dear Sir/Madam,

The OPW, as lead agency for the coordination of an integrated, 'whole-of-Government' approach to flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Material Alterations to Proposed Variation No. 3 to the South Dublin County Development Plan 2022-2028.

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.

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 preparation of a Strategic Flood Risk assessment (SFRA).

PFRA Datasets

The OPW had previously commented regarding the use of PFRA pluvial mapping. This mapping has not been removed and the Chief Executives Report has noted that it is "appropriate to include" and that "most recent available OPW community scale pluvial flood mapping sourced from the OPW run website Floodinfo.ie is also included".

As noted by the OPW "These PFRA indicative flood maps have now been superseded by various more recently published national indicative fluvial, coastal and groundwater flood mapping. It is not intended to update the indicative pluvial maps, as it is not appropriate to map flooding from this source through a national-scale assessment, and maps would be more robust if produced at the community / local scale. PFRA pluvial mapping is not an appropriate dataset for use in consideration of risk from this source". The OPW recommends that PFRA data is no longer used for any purpose.

As Dublin was identified as a community at risk of rainfall flooding the OPW produced Rainfall Flood Extents through the National CFRAM Programme. This dataset does not take into account drainage systems and therefore the risk of pluvial flooding is likely overestimated. If



South Dublin County Council consider pluvial flooding to be issue in the plan area then a more localised drainage assessment for the area should be undertaken.

Flood Zones and Climate Change

The OPW's comment in relation to the Flood Zones has not been addressed, *"It is noted that SDCC have utilised the CFRAM High End Future Scenario extents to define Flood Zones A and B. While the OPW welcomes that SDCC have applied a precautionary approach, it might be noted that as set out in section 2.24 of the Guidelines, Flood Zones "are based on the current assessment of the 1% and the 0.1% fluvial events and the 0.5% and 0.1% tidal events, without the inclusion of climate change factors"."* Flood Zones should be produced as defined by the Guidelines. Therefore, the OPW recommends updating the Flood Zone mapping to the present day extents and including climate change mapping separately. As present day flood extents have been used to prepare the Justification Test supplied with the material alterations only the mapping would require updating.

Figure 25 and Figure 5-2 SFRA

The OPW welcomes the proposed material alteration to relocate an indicative school site to outside of the Flood Zones and future extents.

Plan Making Justification Tests

The OPW previously commented *"Criterion 2(iii) requires demonstration that a zoning or designation is "within or adjoining the core of an established or designated urban settlement". The Guidelines define the core of an urban settlement as follows: "the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions". Only where lands either meet this description, or directly adjoin lands which meet this description can this criterion be satisfied. In response to this criterion, all three Justification Tests have noted that the "City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan." This would appear more applicable as a response to criterion 1 rather than criterion 2(iii)".* Dublin South County Council must provide a response regarding if the zoning is within or adjoining the core to satisfy criterion 2(iii).

All the Justification Tests supplied note that *"The ongoing Camac Flood Alleviation Scheme (FAS) will provide more robust modelling of the pre-scheme Flood Zones and will develop defences for this area".* It should be noted that the proposed defences for the Camac River will be designed to protect existing communities and will not release lands for new development. South Dublin County Council need to liaise with the design team for the Camac Flood Alleviation Scheme to correctly identify sites that may benefit from the scheme and to ensure that any development will not impede or prevent the scheme. Where defences are proposed as part of the scheme new development may be premature until the measures are constructed.

The other proposed mitigation measure in the Justifications Tests is that the ground floor use should be appropriate development and for the majority of the tests this is that the ground floor use is compatible with Flood Zone A. The only development permitted in Flood Zone A is water compatible type development. South Dublin County Council should review if this is



practical or achievable. South Dublin County Council could consider if setting minimum ground floor levels is more appropriate. The Guidelines recommend setting minimum floor levels to above the 1% flood level including an allowance for climate change, with appropriate freeboard.

All development constructed in flood risk areas should use flood resilient construction materials and fittings.

If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie).

Yours sincerely,

A solid black rectangular box used to redact the signature of the official.

pp Conor Galvin