



**Senior Executive Officer,
Forward Planning Section,
Land Use Planning & Transportation Department,
County Hall,
Tallaght,
Dublin 24**

08/09/2021

RE: Draft South Dublin County Development Plan 2022-2028

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 Draft South Dublin County Development Plan 2022-2028.

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). In particular, the OPW welcomes:

- IE2 objective 3 regarding the implementation of the Greater Dublin Strategic Drainage Strategy
- IE4 objective 1 requiring SSFRAs for all new developments within the county
- IE4 objective 2 requiring all developments within the county to be designed and constructed in accordance with the precautionary principle detailed in the OPW guidelines

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

Flood Zone Mapping

It is difficult to assess the zonings/sites at flood risk or if the sequential approach has been applied without the land use zoning maps overlaid with the flood zone maps.

Appendix 2 Schedule 1 lists Flood Zone A as a 10% AEP event, Flood Zone B as 1%, and Flood Zone C as 0.1%. This is incorrect, flood zones are defined as in Section 2.4 of the SFRA whereby Flood Zone A is greater than 1% AEP for fluvial, or 0.5% for coastal, Flood Zone B is between 1% for fluvial or 0.5% for coastal and 0.1%, and Flood Zone C is less than 0.1%.

Flood Relief Schemes

The OPW welcomes IE4 objective 4 to support and facilitate the delivery of flood alleviation schemes in the county, including the Poddle, Camac and Whitechurch Stream



Flood Alleviation Schemes, which are also referenced in section 3.3.2 of the SFRA. The OPW recommends that the text in this objective could be clarified to ensure zoning or development proposals support and do not impede or prevent the progression of these measures.

There are also a scheme planned for Lucan to Chapelizod, which is to be delivered in the second tranche of schemes.

PFRA Mapping

Section 3.3 notes PFRA mapping as a source of information consulted in the preparation of this plan. As noted in the SFRA, the PFRA was a national screening exercise, to scope the CFRAM Programme and to identify areas of potentially significant flood risk. It is important to note that the PFRA was not a detailed assessment of flood risk. It was rather a broad assessment, based on available and readily derivable information to identify areas that may require further assessment. As set out in Circular PL 2/2014 “the (PFRA) maps provide only an indication of areas that may be prone to flooding. They are not necessarily locally accurate and should not be used as the sole basis for defining Flood Zones, or for making decisions on planning applications”. Where more accurate predictive flood mapping is not available, they may indicate where flooding may be an issue.

Justification Tests

Proposed land use zones, some of which are classified as highly vulnerable development in the Guidelines within Flood Zones A and B are shown in the settlement zoning maps. Examples of these are detailed in the Comments on ‘Specific Settlements’ section below. The OPW notes the inclusion of a single Plan Making Justification Test in the SFRA covering the entire county, however, this is not consistent with the Guidelines. Packages of land in flood risk areas which allow for vulnerable development should be considered on a case by case basis. Where the zoning can be justified, appropriate mitigation measures for the particular zone should be considered in section 3 of the Justification Test, and where the zoning cannot be justified, consideration should be given to rezoning as water compatible development.

Where it is intended to zone or otherwise designate land which is at moderate or high risk of flooding, then the appropriateness of the particular development should be rigorously assessed through the application of the Justification Test. The Guidelines set out that, at the Plan-making stage, land use zoning be informed by the suitable level of FRA and if necessary a Justification test. Chapter 5 of the Guidelines set out that “*most flood risk issues should be raised within strategic assessments undertaken by local authorities at the plan-making stage. Therefore, as more plans are reviewed and zoning reconsidered, there should be less need for development management processes to require detailed flood risk assessment*”.

As flood risk assessments are integrated with the SEA process, Section 3.10 also highlights the need that FRA’s be “*undertaken as early as possible in the process so that the SEA is fully informed of the flood risks and impacts of the proposed zoning or development*”.



If it is the case that these sites are already developed then Circular PL 2/2014 provides further advice and detail to planning authorities on older developed areas of towns and cities 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”*.

For sites that are intended to be zoned for development following the application of a Justification Test where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as *Open Space* would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.

National Indicative Fluvial Mapping (NIFM)

The OPW acknowledge that National Indicative Fluvial Mapping outputs were not available at the time of development of this Plan. The outputs are now available on request to Local Authorities.

The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, may be obtained in GIS format from the OPW Flood Risk Management - Data Management Section via email (flood_data@opw.ie).

While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed. Please note that NIFM mapping does not cover catchments that were smaller than 5km².

Consideration of Climate Change Impacts

The OPW welcomes CA objectives 1-3 regarding collaboration with EMRA, the relevant CARO, Codema, and SEAI to achieve climate action policies and objectives set out in the EMRSES to ensure spatial and infrastructure planning are consistent with climate mitigation and adaptation objectives, and to implement the South Dublin County Council Climate Change Action Plan.

Furthermore, the OPW welcomes the discussion on climate change in the SFRA and in particular the consideration of future scenarios when assessing flood risk. However, this discussion is focused on incorporating climate change into development design and the Draft Plan has not addressed how climate change has been considered in the production of this development plan. Planning authorities can consider climate change impacts in the Plan-making Stage, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, and setting specific development management objectives. It should be noted that the flood maps prepared



under the CFRAM, NIFM and ICPSS Programmes include maps for two potential future scenarios taking account of different degrees of climate impact. Consideration might be given to policy objectives in relation to climate change and flood risk.

SUDs Green Infrastructure, Nature Based Solutions

The OPW welcomes Chapter 4 and appendix 4 of the development plan regarding Green Infrastructure, and sections 6 and 7 of the SFRA regarding Riparian Corridors and SUDs respectively. In particular, the OPW welcomes the following objectives:

- NCBH2 objective 4 to protect rivers
- NCBH7 objective 4-6, NCBH8 objective 2-3, and NCB9 objective 4 regarding creation of parks in the Liffey and Dodder valleys and along the Grand Canal
- GI1 objective 1-8, GI3 objectives 1-4, GI4 objectives 1-6, and GI5 objectives 1-7
- COS5 objective 10 & 12 regarding the role of parklands and SUDs in Green Infrastructure networks and Flood Risk Management
- IE3 objective 2 requiring SUDs in new developments

Further to these objectives, 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 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.

Historic Flood Events and Flood Hazard Mapping

Section 3.3 of the SFRA references historic flood events and flood hazard mapping from www.floodmaps.ie. Please note that this website is no longer available and historic flood events are now available on www.floodinfo.ie.

CFRAM Programme

The OPW notes IE4 objective 3 to support and cooperate with the OPW in delivering the relevant CFRAM programme. The CFRAM programme was completed in 2018. The OPW recommends the text of this objective be updated to refer to delivery of measures set out in the relevant Flood Risk Management Plan.

Comments on Specific Settlements

Sheet Map 1 – Lucan

Highly vulnerable *Existing Residential* adjacent to Celbridge Road and highly vulnerable *Village Centre* in Lucan Village have been zoned in Flood Zones A and B, *Enterprise & Employment* which can include highly vulnerable traveller accommodation adjacent to Lucan Village has been zoned in Flood Zone A and highly vulnerable *Existing Residential* adjacent to Griffeen Park has been zoned in Flood Zone B. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development



is not appropriate in Flood Zone A unless a Plan-making Justification Test regarding the specific zoning, completed by the local authority, can be satisfied.

Sheet Map 4 – Grange Castle/Baldonnel

The OPW welcomes objective IE4 SLO1 to require a site and catchment specific Flood Risk Assessment and Mitigation Strategy to be submitted with any proposal for development on the *Enterprise & Employment* zoned lands at Moneenalion Commons Upper, Baldonnel.

It is noted that this zoning can include highly vulnerable traveller accommodation, and has been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test regarding the specific zoning, completed by the local authority, can be satisfied.

Sheet Map 5 – Clondalkin/Naas Road

Highly vulnerable *Existing Residential* and *Town Centre*, and *Village Centre* which can include highly vulnerable development in Clondalkin, *Regeneration* which can include highly vulnerable development and *Enterprise & Employment* which can include highly vulnerable Traveller Accommodation along Nangor and Naas Roads and south of M50/Naas Road interchange, and highly vulnerable *Existing Residential* south of Limekiln Road have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test regarding the specific zoning, completed by the local authority, can be satisfied.

Sheet Map 6 – Rathfarnham

Highly vulnerable *Existing Residential* along the course of the Poddle between Whitehall Road and Fortfield/Wainsfort Road, along the course of the Dodder north of Butterfield Avenue, in Rathfarnham village centre and adjacent to Dodder Park Road, and between Whitechurch Road and Ballyboden Road, highly vulnerable *Village Centre* in Rathfarnham village centre, and highly vulnerable *Local Centre* adjacent to Dodder Park Road and adjacent to Grange Road have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test regarding the specific zoning, completed by the local authority, can be satisfied.

Sheet Map 7 – Rathcoole/Newcastle

Enterprise & Employment which can include highly vulnerable traveller accommodation in Greenogue Business Park, highly vulnerable *Existing Residential* adjacent to Old Bawn Road, have been zoned in Flood Zones A and B, and *Existing Residential* in Glenview Drive has been zoned in Flood Zone B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test regarding the specific zoning, completed by the local authority, can be satisfied.

Sheet Map 8 – Rathcoole/Citywest

The following highly vulnerable developments have been zoned in Flood Zone A and B:



- *Existing Residential* south of N7 at Tay Lane in Rathcoole
- *Enterprise & Employment*, which can include highly vulnerable traveller accommodation, at Greenogue, Baldonnell Business Park and Citywest Business Campus
- *New Residential* south of Bianconi Avenue, south of Carrigmore Avenue
- *Existing Residential* south of Citywest Avenue, adjacent to Old Naas Road between Fortunestown Road and Blessington Road and adjacent to Mill Road

Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test regarding the specific zoning, completed by the local authority, can be satisfied.

Sheet Map 9 - Tallaght

Highly vulnerable *Existing Residential* to the west of Killinarden Road, *Enterprise & Employment* which can include highly vulnerable traveller accommodation west of Whitestown Way and west of Whitestown Drive have been zoned in Flood Zones A and B, highly vulnerable *Existing Residential* adjacent to Ballycullen Avenue and south of Hunters Road, and highly vulnerable *New Residential* south of Hunters Road have been zoned in Flood Zone B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test regarding the specific zoning, completed by the local authority, can be satisfied.

Sheet Map 10 – Ballyboden

Highly vulnerable *Existing Residential* adjacent to the junction of Ballyboden Road/Taylor's Lane and adjacent to Whitechurch Road has been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test regarding the specific zoning, completed by the local authority, can be satisfied.

If further information or input is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Draft South Dublin County Development Plan 2022-2028.

Yours sincerely,



PP Conor Galvin
Flood Relief and Risk Management Division