



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

22<sup>nd</sup> April 2022

**RE: Proposed Material Amendments to the Draft South Dublin County Development Plan**

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 Material Amendments to the Draft South Dublin County Development Plan 2022-2028.

This submission is made specifically concerning flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines'. Further submissions on the draft Plan may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the following:

- The addition of IE3 Objective 8 regarding the integration of surface and groundwater systems
- The addition of a flood zone map overlaid on the land use zoning mapping
- The clarification of IE4 Objective 3 to refer to the Flood Risk Management Plan
- The clarification of IE4 Objective 4 to ensure that zoning or development proposals support and do not impede flood relief works

**Justification Tests**

The OPW welcomes the additional Plan Making Justification Tests included at Material Alteration stage. However, as the Justification Tests provided cover areas rather than specific zonings not all criteria in part 2 have been satisfied. All criteria of the Justification Test must be satisfied for a zoning to be justified.

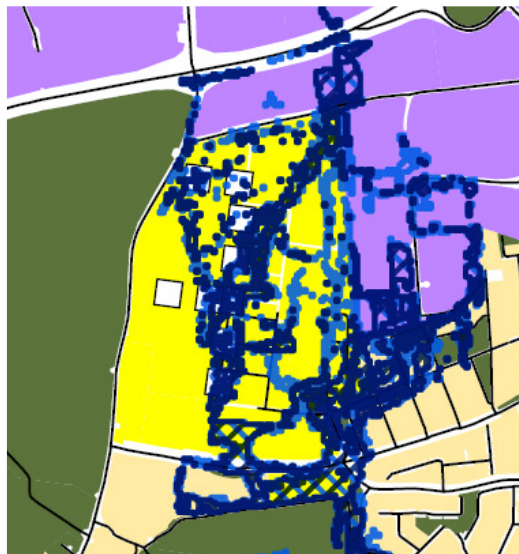
All Justification Tests included have set out the following requirements for FRAs in flood risk areas:

- Development in Flood Zone A should consist of water compatible development only

- Highly vulnerable development shall not be permitted in Flood Zones A or B
- Existing open spaces and water compatible uses in Flood Zones A and B should be retained to maintain flood storage areas

Consideration might be given to the incorporation of these requirements into the plan supported by relevant policy objectives.

The OPW response to the draft plan commented on the undeveloped lands zoned highly vulnerable *New Residential* south of Bianconi Avenue. These lands have retained their zoning, but have not been assessed against the criteria of the Plan Making Justification Test.



*New Residential lands south of Bianconi Avenue*

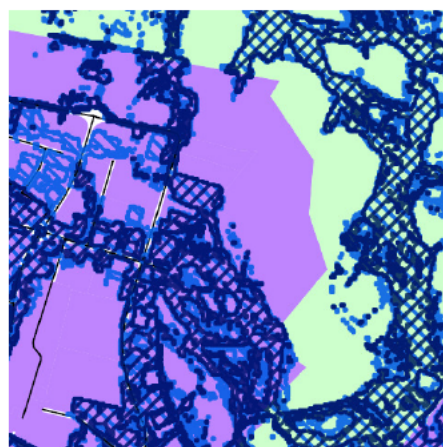
### **Map Alterations**

Material alteration number 2.19 rezones lands from *Enterprise & Employment* to *Regeneration* which can allow highly vulnerable development. The combined SEA, AA, SFRA Assessment has stated that an SFRA assessment of these lands is not applicable, however these lands overlap with Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A or B unless the specific zoning has been assessed against and satisfied all criteria of the Plan Making Justification Test.

Material alteration number 2.20 rezones lands from *Rural & Agriculture* to *Enterprise & Employment* that is classified as *less vulnerable* under the Guidelines. The combined SEA, AA, SFRA Assessment has stated that these lands do not pass the Plan Making Justification Test. Less vulnerable development is not appropriate in Flood Zones A or B unless the specific zoning has been assessed against and satisfied all criteria of the Plan Making Justification Test.



*Amendment 2.19 Regen zoned lands*



*Amendment 2.20 Enterprise & Employment zoned lands*

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

Yours sincerely,



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**PP Conor Galvin**  
**Flood Relief and Risk Management Division**