



# Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	State Body
Name:	The Office of Public Works Flood Risk Management
Reference:	DWTRLAP-152014
Submission Made	November 20, 2024 3:23 PM

## Topic

Strategic Flood Risk Assessment & SFRA Map  
Submission

Please see OPW FRM Submission attached.

## File

2026\_LTR\_241106\_OPW Observations\_Variation No. 2 Wicklow CDP 22-28\_1.0.pdf, 0.17MB

2026\_LTR\_241111\_OPW Observations\_Wicklow Town - Rathnew LAP 2025\_1.0.pdf, 0.35MB



Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow Town,  
A67 FW96

11/11/2024

**RE: Wicklow Town - Rathnew Local Area Plan 2025**

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Wicklow Town - Rathnew Local Area Plan 2025.

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

The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA).

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

**Flood Zone Mapping**

It is difficult to assess whether the sequential approach has been followed without the inclusion of flood zone mapping overlaid on lands use zoning mapping.

**Flood Risk Assessment Stages**

A Strategic Flood Risk Assessment should among other outputs identify principal rivers, and the location of any flood risk management infrastructure. Wicklow County Council might consider including discussion on the study area, including sources of risk such as watercourses in the town.

**Flooding Datasets**

Section 2.4 of the SFRA notes that, as part of the preparation of the SFRA for the Wicklow County Development Plan 2022-2028, countywide flood zone mapping was developed, and that this mapping will be utilised as flood mapping for the SFRA of the Wicklow Town-Rathnew Local Area Plan. This section sets out the sources of information included in this assessment, with coastal datasets listed including the following:

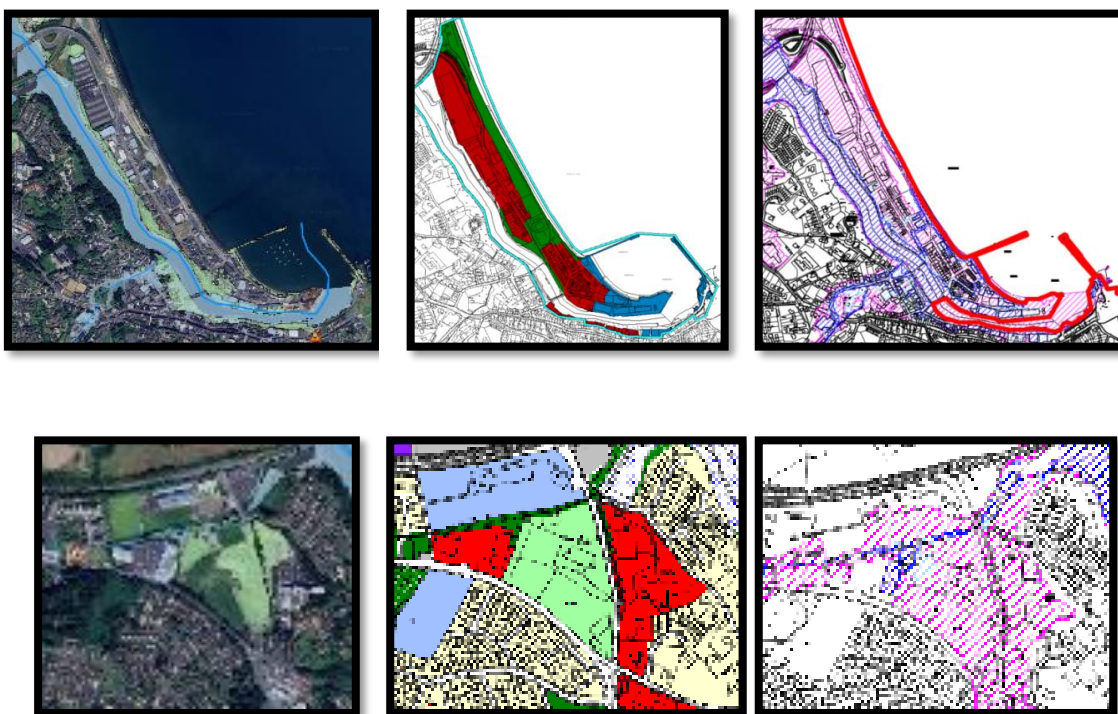
- Irish Coastal Protection Strategy Study (ICPSS)
- Catchment Flood Risk Assessment and Management (CFRAM)



The national scale coastal flood hazard maps from the ICPSS project that were published by the OPW in 2012 are now superseded by the outputs of the National Coastal Flood Hazard Mapping (NCFHM) project, which was completed in 2021, and was not available for inclusion in the Wicklow County Development Plan. These coastal flood hazard maps, for both extent and depth have been produced for a range of annual exceedance probabilities, for the present day, as well as for multiple future scenarios. These maps do not take account of flood defences potentially protecting the coastal floodplain and so are in line with the definition of Flood Zones as set out in the Guidelines.

CFRAM mapping is based on more detailed modelling of the propagation of floodwaters inland over time in a coastal flood event than NCFHM mapping, which assumes a horizontal inland projection of peak levels. However, NCFHM mapping is based on more up to date estimates of extreme coastal levels than those that were used for CFRAM coastal mapping which was based on ICPSS data. As such, NCFHM and CFRAM mapping should be considered alongside each other, taking account of the presence of defences and the extent of the coastal flood plain with regard to the definition of coastal flood zones.

It is noted that there are locations in the plan area, some examples of which are provided below, where NCFHM extents differ to extents indicated by Flood Zone mapping. Wicklow County Council might include text in the SFRA to justify the decision to disregard risk indicated by NCFHM mapping.



*CFRAM Flood Zones A and B with  
NCFHM Extents*

*Land Use Zoning*

*LAP Flood Zones A and B*

### **Construction, Replacement or Alteration of Bridges and Culverts over Watercourses**



SLO2 and SLO3 reference a new road, the Rathnew Inner Relief Road, which will cross the Rathnew Stream and Cronroe watercourses. These Specific Local Objectives have been described in the SFRA as not having satisfied criteria of the Plan Making Justification Test, but have retained their status on the basis of there being no alternative route in the case of SLO2, and no alternative route at lower risk of flooding in the case of SLO3.

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.

### **Sustainable Drainage Systems (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.

The Guidelines also recommend 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.

### **Justification Tests**

The OPW welcomes the provision of plan making justification tests in the draft plan.

Part 3 of the Plan Making Justification Tests included in the SFRA notes in all cases that “*Assessment of flood risk has been incorporated into the Plan SEA Process*”. Part 3 of the Plan Making Justification Test as set out in the Guidelines is that “*A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere*”. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should not be passed on to development management.

### **Wicklow County Campus**

It is noted in the conclusion to the Plan Making Justification Test for lands zoned Wicklow County Campus that the test has not been satisfied. The recommendation however states that as significant areas within this site are already developed, it is considered appropriate to retain the Wicklow County Campus zoning objective. It is also noted that the zone is sufficiently large to provide for the development of desired uses while avoiding development in areas identified as being at risk of flooding.

In certain cases where lands are already developed, it may be appropriate to retain a zoning to reflect existing usage, even though not all criteria of the Justification Test have been satisfied. In such cases, it may be appropriate to attach an objective to the zoning, to ensure no further infill development in flood risk areas. Where undeveloped lands on which flood risk has been identified have not satisfied all criteria of the test, the sequential approach as set out in the Guidelines should be followed, and development of such lands should be avoided, or a usage appropriate to the level of flood risk should be substituted.

### **Waterfront Zoned Lands**



The recommendation attached to the Plan Making Justification Test for Waterfront zoned lands notes that uses permitted in Area 1 and 2 are generally water compatible, apart from Aires sites which are noted to be less vulnerable. It is specified in the Guidelines that land and buildings used for holiday or short-let caravans and camping can be considered less vulnerable only when subject to specific warning and evacuation plans.

If further information 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 Wicklow Town – Rathnew Local Area Plan 2025.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Conor Galvin', positioned above a horizontal line.

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments