

	<h1>Greystones-Delgany & Kilcoole LPF Variation No.4</h1>
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Who are you:	State Body
Name:	Office of Public Works
Reference:	GDKLPF-120215
Submission Made	June 12, 2025 12:05 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART B Settlement Specific Objectives.

- Strategic Environmental Assessment
- Other topics

Write your observations here:

Please see OPW Flood Risk Management's submission in the attached

Please select which town you want to comment on:

Greystones/Delgany, Kilcoole

Upload a File (optional)

2026_LTR_250612_OPW Observations_Variation No4 Wicklow CDP 22-28_1.0.pdf,
0.56MB



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

12/06/2025

RE: Proposed Variation No. 4 to the Wicklow County Development Plan 2022-2028 (re. the Draft Greystones/Delgany & Kilcoole Local Planning Framework (LPF) 2025)

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation No. 4 to the Wicklow County Development Plan 2022-2028 (re. the Draft Greystones/Delgany & Kilcoole Local Planning Framework (LPF) 2025).

This submission is made specifically concerning flood risk management. Further submissions on the Draft 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).

Coastal Flood Datasets

The flood zone mapping appears to have only considered the National Flood Coastal Hazard Mapping (NFCHM) and not the National CFRAM coastal dataset.

The NFCHM maps show the worst case scenario as any flood defences potentially protecting the coastal floodplain are not taken into account (and so are in-line with the definition of the Flood Zones as set out in the Guidelines) and also assume a horizontal inland projection of the peak levels, rather than a propagation of flooding inland over time. 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. National CFRAM mapping is based on more detailed modelling of the propagation of floodwaters inland over time in a coastal flood event. 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.



Map No. 4B Flood Risk – Present Day & Draft Land Use Zoning Objectives	National CFRAM Coastal 1% and 0.1% AEP Extents

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.

Past Flood Events

A review of past flood events in the settlement areas should be undertaken. Past flood events reported to the OPW can be viewed on the webportal Floodinfo, however Wicklow County Council may have other records.

Flood Relief Schemes

A flood relief scheme is proposed for Greystones and Environs, as well as a potential scheme subject to further assessment for Kilcoole. Wicklow County Council should have regard to these to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures. Discussion in relation to these proposals should be included and that consideration has been given during the zoning of lands. A specific objective in this regard should be included in the Draft Local Area Plan.

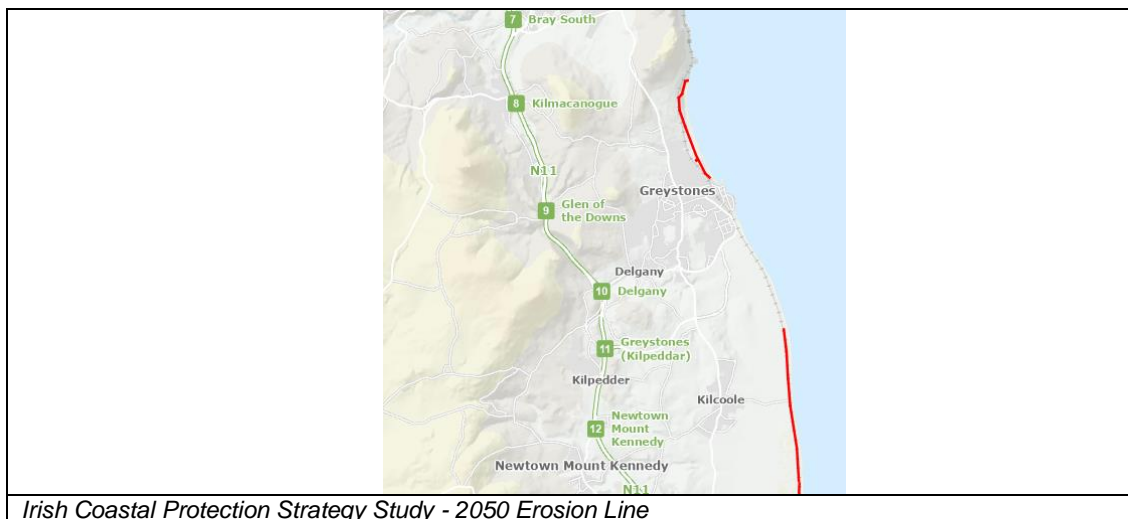
Coastal Erosion

The Irish Coastal Protection Strategy Study produced 2050 Erosion Line mapping showing coastal areas potentially at risk of coastal erosion. These erosion maps have been produced for existing conditions only and do not include for projected future changes in climate such as sea level rise, increased storm frequency or associated variations in erosion rates.

The erosion hazard mapping is for strategic purposes, and minor or local features may not have been included in their preparation. Therefore, the maps should not be used to assess the erosion hazard and risk associated with individual properties or point locations, or to replace a detailed local erosion hazard and risk assessment. It was not possible to eliminate the effect of existing coastal defence structures from the erosion hazard and risk assessment. Consequently, there will be areas where no erosion line is shown that are at risk from erosion,



should present defences fail or not be maintained in the future. Equally, there may be an erosion line shown in areas that are now adequately defended by coastal protection structures that were introduced during or after the assessment period.



Consideration of Climate Change Impacts

The OPW welcomes the discussion on flood risk and climate change in the SFRA, and the inclusion of future scenario extents on the flood zone mapping. It is noted therein that while the increase in fluvial flood extent generally affects already developed areas, *“Where green field land is affected by future scenario flood mapping, the sites are generally large enough such that the development of desired uses may avoid development in the at risk area utilising the sequential approach in site planning. In some cases, zonings have been changed to more appropriate uses.”*

The future scenario mapping demonstrates the potential increase in flood zone B extents only. It would also be useful to also show the potential increase in the flood zone A extents as development currently appropriate in flood zone B may not be appropriate if located in flood zone A in the future and these developments may consider mitigation measures now that would ensure the development is resilient to any increases in flood risk.

Objective GDK63 states that developments *“identified as at possible future risk of flooding having regard to climate change scenarios either on Map 4C attached to this LPF or on any future maps prepared by the OPW during the lifetime of the LPF; shall comply with the ‘Justification Test for Development Management’, as set out in Box 5.1 of ‘The Planning System and Flood Risk Management’ Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA”*. There is no requirement in the Guidelines to complete a Justification Test due to climate change, only developments at risk of flooding presently would currently require a Justification Test. However the effect of climate change should be assessed in any site specific flood risk assessment.

In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by



avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.

An area zoned for highly vulnerable *RN1: New Residential – Priority 1* has been shown as at risk in both the mid-range and high-end future scenarios. Wicklow County Council might provide further detail regarding how risk to this area might be mitigated.

<p>Map No.4B Flood Risk – Present Day & Draft Land Use Zoning Objective, New Residential Priority 1 zoned lands at Greystones South - Charlesland</p>	<p>Map No. 4D Flood Risk – Potential Future Scenario & Draft Land Use, New Residential Priority 1 zoned lands at Greystones South at Charlesland</p>

Impacts on Other Areas

While the lands at North 3 and North 4 zoned *RN2: New Residential – Priority 2* may not be prone to flood risk itself it has been identified that development of these lands could present an increased risk of flooding in the built up area of Greystones and risk of landslides in this area. Wicklow County Council have noted that “*any development considered for this area would require to integrate significant water management measures to ensure no increase in run off or flood risks*”. In line with the Guidelines, proposed new development needs to avoid increasing flood risk elsewhere and it will be important for Wicklow County Council to assess this requirement.

<p>Greystones North</p>	<p>Map No.4B Flood Risk – Present Day & Draft Land Use Zoning Objective</p>



Justification Tests

The OPW welcomes the inclusion 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.

Sustainable Drainage Systems (SuDS)

Wicklow County Council have identified in the Greystones-Delgany area that a number of storm / combined sewers surcharge due to pluvial flood issues. The Draft Plan also notes that the surface water network in the Rathdown – Redford area does not have capacity to accommodate increased flows, and surface water flows generated by identified development lands in the Coolagad – Templecarrig will need to be carefully controlled. Objective GDK64 states that “*new significant development in the Coolagad – Templecarrig area in north Greystones will only be considered where the development’s surface water drainage arrangements accord with Wicklow County Council’s Sustainable Urban Drainage (SUDs) Policy and an overall Surface Water Management Plan for the area which addresses the capacity of the area network and obviates flood risk on downstream lands*”. No details have been provided on the Surface Water Management Plan in the Draft Plan or the SFRA. The OPW would recommend that Wicklow County Council carry out the required assessments of the surface water / drainage issues and adequately address them. The use of different Nature Based Solutions and SuDS measures should be examined in this Surface Water Management Plan.

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 are appropriate in order to avoid reliance on individual site by site solutions.

Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

New bridges across rivers are proposed in the Draft Plan. 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.



If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Variation to the Wicklow County Development Plan.

Yours sincerely,

Rachel Woodward

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments