

	Arklow LPF Variation No.5
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Who are you:	State Body
Name:	OPW Flood Risk Management
Reference:	ARKLPF-150547
Submission Made	November 10, 2025 3:07 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

Maps:

- Flood Risk Maps

Appendices:

- Strategic Flood Risk Assessment

[Upload a File \(optional\)](#)

2026_LTR_251110_OPW Observations_V5 Wicklow CDP 22-28 Arklow LPF 25_1.0.pdf,
0.85MB



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

10/11/2025

RE: Proposed Variation No. 5 to the Wicklow County Development Plan 2022-2028 (re Arklow Local Planning Framework 2025)

Dear Sir/Madam,

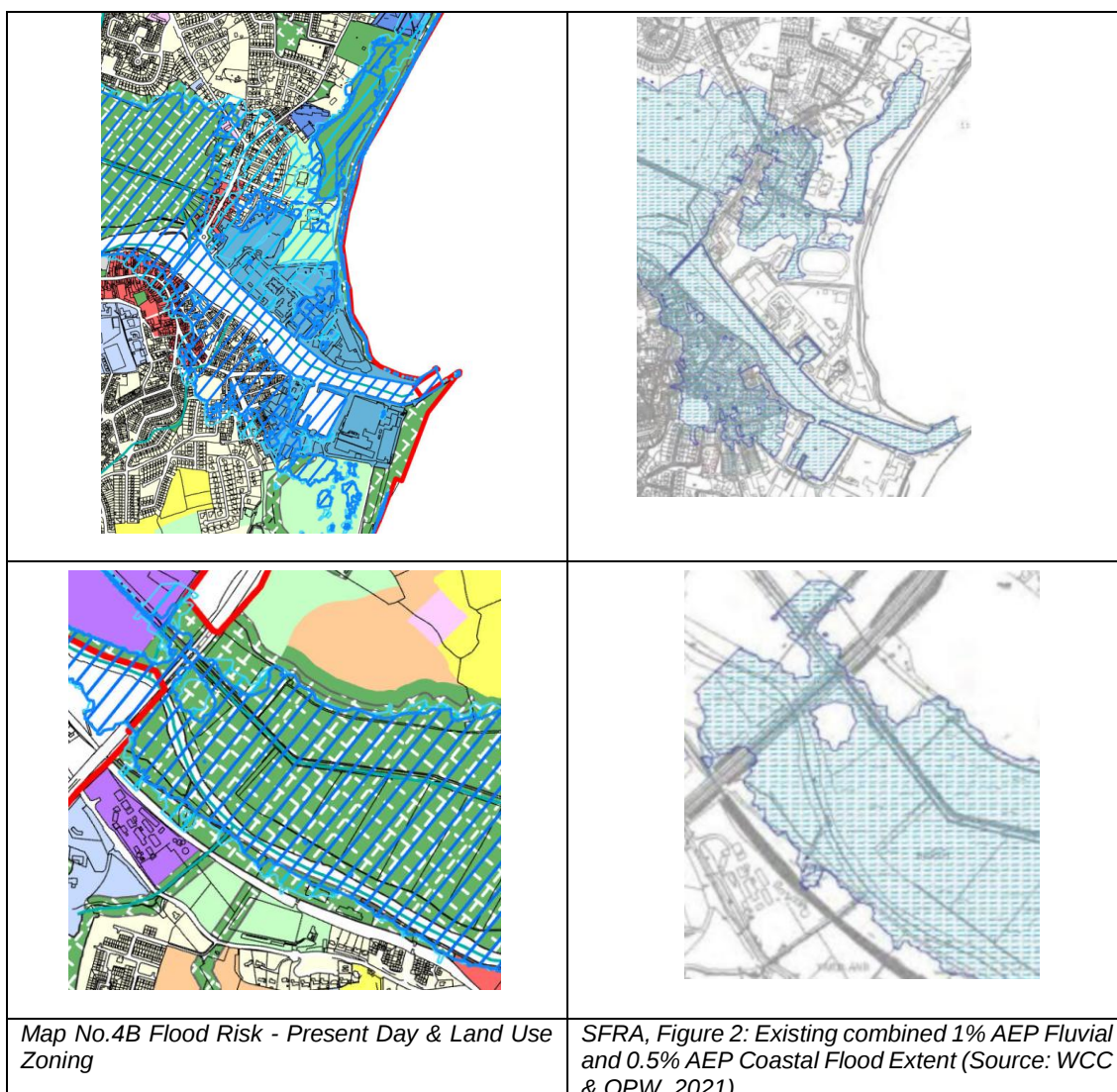
The Office of Public Works (OPW), as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation No. 5 to the Wicklow County Development Plan 2022-2028 (re Arklow Local Planning Framework 2025).

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

Flood Zone Mapping

There are discrepancies between the flood zone mapping and the flood relief extents provided, with sections of Flood Zone A omitted from the Flood Zone Map. The 0.1% AEP flood extents for the flood relief scheme are not provided in the SFRA and could not be checked. Wicklow County Council should review to ensure the flood zones displayed are consistent with the datasets adopted.



Unmapped Watercourses

There are a number of watercourses with no flood zones. These are watercourses with a catchment area less than 5km² for inclusion in the National Indicative Fluvial Mapping Programme (NIFM), and therefore the OPW has not produced flood extents for these watercourses. The surrounding lands have been zoned *OS2 Open Space* to achieve a 25m riparian buffer zone, however as flood risk has not been considered in the land use zonings.

There are tributaries of the Avoca with no flood zones and similarly a 25m riparian buffer zone has been zoned *OS2 Open Space*. Flood risk in Arklow was not modelled as part of the National CFRAM programme, as it was part of a separate study for a flood relief scheme.

There are two areas zoned for *RN(1) New Residential Priority 1* and *RN(2) New Residential Priority 2* in the vicinity of these watercourses with other land use zonings being *TC Town Centre*, *E1 Employment* and *RE Existing Residential*. Wicklow County Council should review if stage 3 flood risk assessments are required to inform the land use zonings and the SFRA.

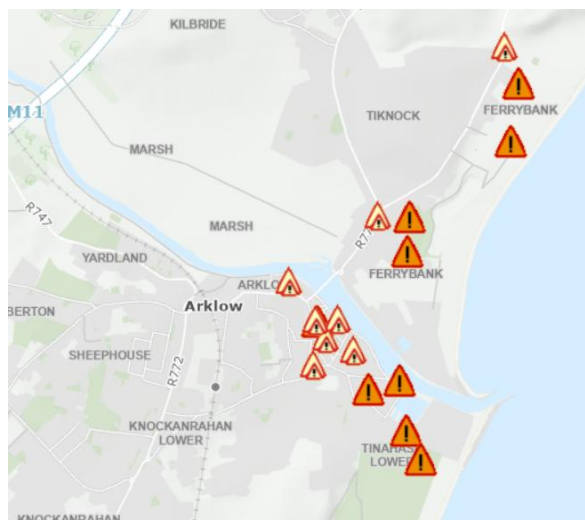


An evaluation of site-specific flood risk assessments may also assist with establishing flood zones.



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 also have other records. This could include listing the events, the source of the flooding, year of the event etc., assessing the location in relation to the flood risk extents, and noting in sequential approach assessments and justification tests that previous flood events have occurred.



Floodinfo, Past Flood Events

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.



Irish Coastal Protection Strategy Study - 2050 Erosion Line



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.”*

Future scenario mapping for NIFM has been omitted from the future scenario mapping provided. Wicklow County Council should review and update accordingly.

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.

Wicklow County Council should consider including discussion on how climate change has been considered in the flood relief scheme.

AOS Active Open Space

Objective ARK43, proposes the potential development of education uses on lands zoned AOS *Active Open Space*. The OPW welcomes the discussion in the SFRA in regard to this objective that the sequential approach will be applied in planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as *Open Space* will be permitted for the lands which are identified as being at risk of flooding. Wicklow County Council may consider transposing this into the Objective or Plan.

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.

Wicklow County Council should identify the areas that will benefit from the flood relief scheme, highlight the residual risks which will remain and how these can be managed. For the areas which will not benefit from the scheme provide guidance on the structural or non-structural measures required prior to any future development.



In the test for *CE Community and Education* zoning, Wicklow County Council might clarify why the existing educational centre is considered to be a less vulnerable development, as generally this type of development would be classified as highly vulnerable.

Sustainable Drainage Systems (SuDS)

The Guidelines recommend that the Strategic Flood Risk Assessment provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also 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. There are a number of lands with specific local objectives and large undeveloped land zonings where integrated and area based provision of SuDS and green infrastructure may be appropriate in this context.

Wicklow County Council should refer to the Guidance Document for Planners, Developers and Developer Agents 'Implementation of Urban Nature-based Solutions'.

Restrictions on the Construction or Alteration of Bridges and Culverts

New bridge crossings 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