



Draft Blessington Local Area Plan Submission - Report

Who are you:	State Body
Name:	OPW
Reference:	DBLESSLAP-163945
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Topic

Strategic Flood Risk Assessment / SFRA Map

Submission

Please see submissions for Blessington LAP and Variation No. 3 to the Wicklow County Development Plan attached.

File

2026_LTR_241119_OPW Observations_Variation No. 3 Wicklow CDP 22-28_1.0.pdf, 0.17MB

2026_LTR_241129_OPW Observations_Blessington LAP_1.0.pdf, 0.26MB



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

05/12/2024

RE: Draft Blessington 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 Draft Blessington Local Area Plan 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).

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.

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

Discussion on linear green space on a vacant site between 'The Forge' and the Market House/Credit Union which widens into a larger public realm/green square is noted. Wicklow County Council may consider whether this might offer opportunities for integrated area based provision of SuDS.



Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

Road objectives that cross watercourses have been referenced in the Draft Plan, including Blessington Demesne Link Road and Blessington Inner Relief Road (southern section).

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.

Consideration of Climate Change Impacts

The OPW welcomes the discussion on flood risk and climate change in section 5 of 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.”*

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 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.



Flood Zones A and B and
HEFS extents



New Residential Priority 1
zoned lands at Oak Drive

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.

All criteria of the Plan Making Justification Test must be demonstrably satisfied for a zoning to be considered justified. Criterion 2(iii) is a requirement that in order for the test to be satisfied, the zoning must be located either within the core of a settlement, or adjoining the core. A proposed or existing development in such a zoning which might “*serve all parts of established or designated urban settlements, including the core*” does not satisfy this requirement, unless the proposed zoning is within or adjoining the core.

Community & Education Zoned Lands

An area of undeveloped lands overlapping with Flood Zone B has been zoned Community & Education, which can allow for highly vulnerable development such as schools and nursing homes. No commentary has been included to demonstrate whether this zoning has been assessed against the criteria of the Plan Making Justification Test. Highly vulnerable development is not appropriate in Flood Zone B unless the planning authority can demonstrate that all criteria of the Plan Making Justification Test have been satisfied.



Flood Zones A and B



*Community & Education
Zoned Lands at Oak Drive*

If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Draft Blessington Local Area Plan 2025.

Yours sincerely,

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments