

	Arklow Local Planning Framework: Proposed Material Alterations to the Wicklow County Development Plan (2022– 2028) Submission Report
---	--

Who are you:	State Body
Name:	OPW Flood Risk Management
Reference:	ARKPMA-090859
Submission Made	May 28, 2026 9:22 AM

Topic

LPF - Proposed Material Alterations No. 29 Submission

Submission

Please see OPW Flood Risk Management's observations in the attached letter

Upload a File (optional)

2026_LTR_260528_OPW Observations_MAs Wicklow CDP 22-28 Arklow LPF_1.0.pdf,
1.04MB



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

28/05/2026

RE: Proposed Material Alterations Arklow Local Planning Framework Variation to the County Development Plan 2022 - 2028

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 Material Alterations Arklow Local Planning Framework Variation to the County Development Plan 2022 - 2028.

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

Flood Risk Management (FRM) – General Guidance

The revision of the National Planning Framework (2025) sets out National Policy Objective 78 to ***“Promote sustainable development by ensuring flooding and flood risk management informs place-making by:***

- *Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management;*
- *Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.”*

Unmapped Watercourses

Previously the OPW had commented that *“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”*. Since the proposed variation consultation, land zoning types RN(1) New Residential Priority 1 and RN(2) New Residential Priority 2 have been replaced with a RN New Residential zoning.

Section 1.4 of the Technical Appendix A of the Guidelines states that *“Detailed assessments may be identified in county wide flood risk assessment or in the Regional Flood Risk*



Appraisal but should be undertaken where zoning of land is being considered within the development plan". Therefore, as Wicklow County Council are proposing to zone lands Wicklow County should carry out the relevant risk assessments and establish if stage 3 flood risk assessments are required to inform the land use zonings, the SFRA and planning decisions.

The Guidelines set out a three Stage Flood Risk Assessment process for the Planning Authorities to identify whether flood risk may exist, and the degree to which it is an issue, and what assessment to a scale proportionate to the risk should then be carried out. The following is an overview of this three-stage process;

Stage 1 Flood risk identification – To identify whether there may be any flooding or surface water management issues related to a plan area or proposed development sites that may warrant further investigation.

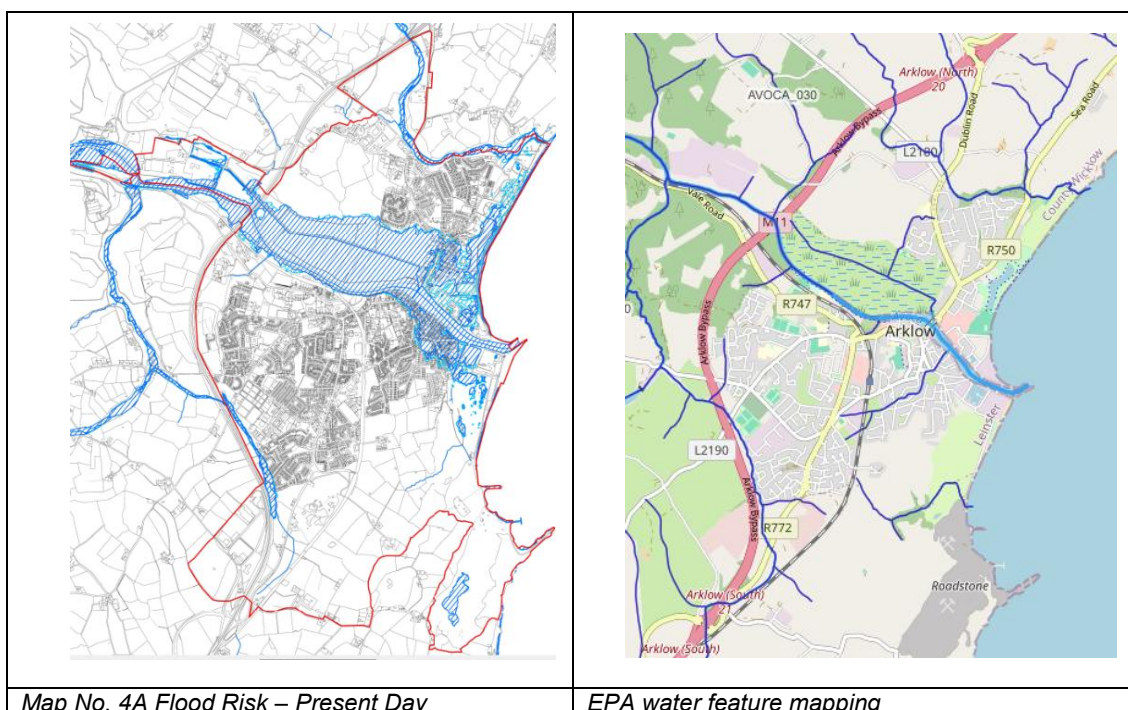
Stage 2 Initial flood risk assessment – To confirm sources of flooding that may affect a plan area or proposed development sites, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve preparing indicative Flood Zone maps. Where hydraulic models exist, the potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment should be scoped.

Stage 3 Detailed flood risk assessment – To assess flood risk issues in sufficient detail to prepare Flood Zone maps based on a quantitative appraisal of potential flood risks to a proposed or existing development or to land that is being considered for zoning, and to identify potential impacts on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

Where unmapped watercourses occur, a stage 1 assessment would indicate a potential source of flooding that may warrant further investigation. A stage 2 appraisal of the adequacy of existing information might indicate that there is sufficient information available to either assess that fluvial risk is not present (e.g. a surface water feature misclassified as a watercourse), or that fluvial risk is present and that there is sufficient information available to assess and classify the level of risk (e.g. evaluation of site-specific flood risk assessments accepted by Wicklow County Council for the area provides sufficient information for the establishment of flood zones). If however assessment indicates risk is present, but insufficient information is available to establish flood zones, a stage 3 detailed flood risk assessment may be required.



The Chief Executive's Report has noted that some of the watercourses are culverted and may not follow the exact path as shown. On the mapping provided as part of the material alterations some watercourses have been omitted. Wicklow County Council should clarify what watercourses are culverted and show any open channel watercourses on the mapping.



AOS Active Open Space

In relation to Objective ARK43 which proposes the potential development of education uses on lands zoned AOS Active Open Space, the OPW welcomes the proposed additional text to the objective in material alteration No. 8. The new text is to ensure that the sequential approach is applied and only water compatible development will be permitted for lands at risk of flooding.

Justification Tests

The OPW had previously commented that *“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”*. This comment has not been addressed. Wicklow County Council need to provide guidance on the structural or non-structural measures that would be appropriate for development in areas at flood risk e.g. proposed minimum floor levels, highly vulnerable development on upper floors etc. For the existing communities that will benefit from the flood relief scheme, the scheme is the mitigation measure, however it should be noted that development in these areas may be premature until the completion of the scheme. Wicklow County Council will need to highlight the residual risk that will remain after the scheme is constructed and provide guidance on how these can be managed.

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