



**Development Plan Submissions,
Strategic & Economic Development Directorate,
Cork City Council,
City Hall,
Anglesea Street,
Cork
T12T997**

26th April 2022

RE: Material Alterations to the Draft Cork City 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 Material Alterations to the Draft Cork City Development Plan 2022-2028.

This submission is made specifically concerning flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines'. Further submissions on the draft Plan may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the following:

- Amendment 1.365 which includes the description for the GIS datasets as requested in the OPW response to the draft plan
- Amendment 1.207 which adds a new objective 9.21 to support the development of the National Coastal Change Management Strategy
- Amendment 1.268 to ensure 40% climate change allowance is added to finished floor levels
- Amendment 1.339 to restrict permissible usage within Flood zones A or B in areas that have not passed the Justification Test to water compatible and less vulnerable uses as appropriate to the particular Flood Zone

Updates to SFRA Mapping

While amendment 1.364 to update the SFRA to include ICPSS mapping separately and amendment 1.363 to overlay Flood zone A and B on the land use zoning mapping are welcomed, these maps have not been included with the consultation documents.

In addition, while it is stated in the 'SFRA Updates & Consideration of Alterations' document that "*scenarios mapping will be updated to show the increase in the 1% AEP*

flood event”, this is not referenced in the proposed Material Alterations document and this mapping has also not been included with the consultation documents.

Justification Tests

While amendment 1.366 to “*provide finer granularity to the Justification Tests provided in Table 5 of the SFRA report making more specific reference to the specified locations*” is welcomed, no updated Justification Tests have been included for review at Material Alteration stage. As such, no commentary can be provided on whether these zonings meet the requirements of the Plan Making Justification Test as set out in the Guidelines.

Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

The OPW commentary on the draft plan noted the discussion on proposed bridges planned connecting Kent Station to the South Docks, at the Eastern Gateway and at Walter Street. It was advised 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. No commentary has been included at material alteration stage with regard to this requirement.

Material Amendments with Flood Risk Implications

The SFRA Updates and Consideration of Alterations document sets out that “*Amendment 2.28, Amendment 2.75 and Amendment 2.99 were found to potentially conflict with proper flood risk management and not comply with the Flood Risk Management Guidelines; there would be potential risk to environmental components including human health and material assets. As a result, these Amendments were advised against.*”

The OPW supports this assertion, as these amendments have the potential to allow additional vulnerable development in flood risk areas, which is not appropriate unless all the conditions of the Plan Making Justification Test have been satisfied.

If further information or input is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Draft Cork City Development Plan 2022-2028.

Yours sincerely,



PP Conor Galvin
Flood Relief and Risk Management Division