



Proposed Variation No 3

South Dublin County Council

City Edge SURF

SFRA - Section 7

Justification Tests



7 JUSTIFICATION TESTS

7.1 Overview

The SURF review in Section 5 determined that there are areas within the PDAs where highly vulnerable land use is proposed within Flood Zone A or B, and where less vulnerable land use is proposed within Flood Zone B of the SDCC CDP.

Where potentially vulnerable development is proposed in a flood zone a justification test is required. The determination of the flood zones for this purpose is based on the current day climate scenario flood zone extents rather than the high end future scenario flood zones used in the CDP. The questions for the justification test for development plans are given in Box 4.1 of The Planning System and Flood Risk Management – Guidelines for Local Authorities (2009) and is reproduced in Figure 7-1 below.

Box 4.1: Justification Test for development plans

Where, as part of the preparation and adoption or variation and amendment of a development/local area plan¹, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 3.2, all of the following criteria must be satisfied:

- 1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
- 2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
 - (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement²;
 - (ii) Comprises significant previously developed and/or under-utilised lands;
 - (iii) Is within or adjoining the core³ of an established or designated urban settlement;

- (iv) Will be essential in achieving compact and sustainable urban growth; and
 - (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.
- 3 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.
- N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.

Figure 7-1: Justification test for Development plans (source: DEHLG 2009)

7.2 Red Cow and Cherry Orchard PDA Justification Test – Area 1

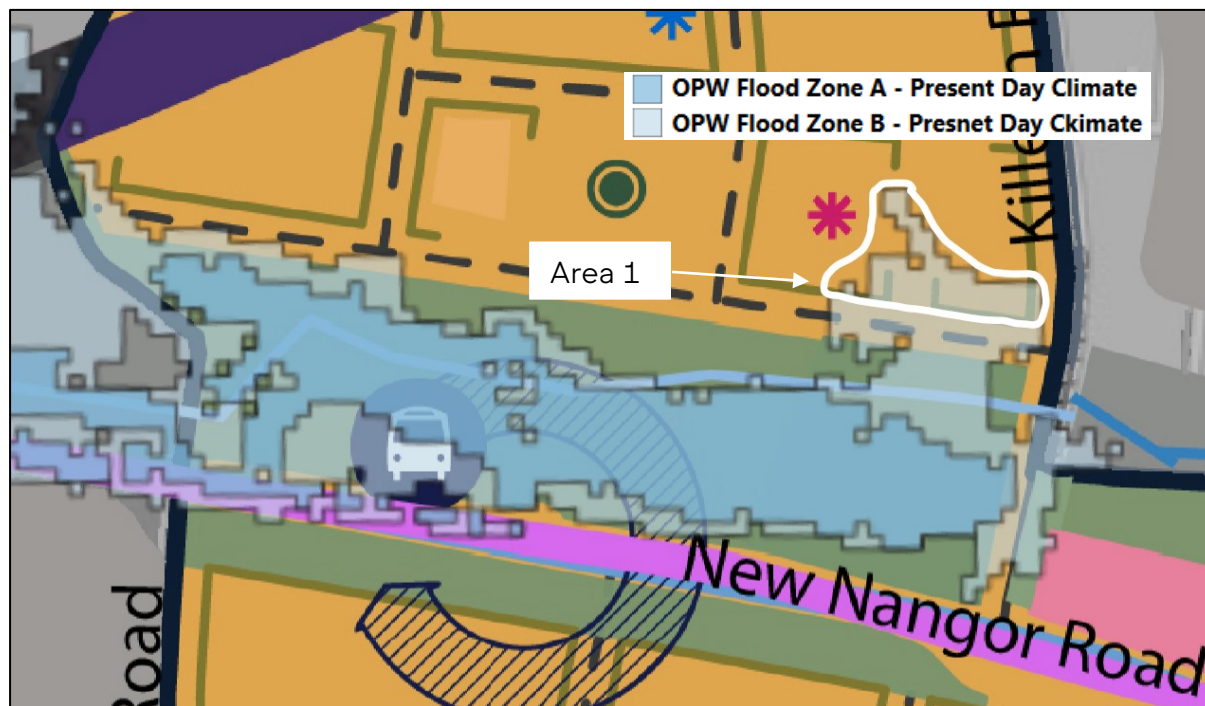


Figure 7-2: Area 1 of the Red Cow Cherry Orchard PDA with current climate scenario flood zones showing the area requiring justification test

The SDCC development plan 2022-2028 has zoned this part of the Red Cow and Cherry Orchard PDA for residential led mixed use regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. The key element of land use within City Edge is that all categories are mixed use, with the use emphasis varying from category-to-category e.g. Res Led Mixed Use, Employment led Mixed Use etc. This zoning is compatible with the proposed PDA structure.

The development proposed in flood zone A consists of parkland which is water compatible development and is appropriate in flood zone A. The development proposed in flood zone B includes roads, parkland which are water compatible, but also residential led mixed use development which can be highly vulnerable. Area 1 for the justification test is residential led zoning in Flood Zone B as shown in Figure 7-2.

JUSTIFICATION TEST FOR DEVELOPMENT PLANS

1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The proposed urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy and the South Dublin County Development Plan (2022-2028).

As noted in Section 6.3 of this report, the area has been identified in the Metropolitan Area Strategic Plan (MASP) of the Regional Spatial and Economic Strategy for the Eastern and Midlands Regions (RSES) for strategic brownfield regeneration and in particular that the Naas Road /Ballymount area has significant brownfield lands in South Dublin County Council area, with potential for residential development and more intensive employment/mixed uses

The SDCC development plan 2022-2028 identifies the City Edge area as a mixed use regeneration area and includes:
CS2 Objective 1: To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road / Ballymount as defined by the City Edge Project boundary. The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The City Edge Strategic Framework will inform this Statutory Plan.
The City Edge SURF fulfils the requirements of CS2 Objective 1 above.

2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:

i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;

The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.

ii. Comprises significant previously developed and/or under-utilised lands;

The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of serviced brownfield lands to deliver higher intensity urban regeneration, the subject lands need to be regenerated and should include a significant quantum of residential and more intensive employment land use.

iii. Is within or adjoining the core of an established or designated urban settlement;

City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan.

iv. Will be essential in achieving compact and sustainable urban growth;

As indicated by their designation at national, regional and local levels, the subject lands, being primarily under-utilised industrial and semi-industrial brownfield lands, are essential to achieving compact and sustainable urban growth. The redevelopment of this area will ensure the efficient use of public investment in infrastructure to date, including the Luas Red line, the Kildare Rail line, Grand Canal greenway etc. and will help to support and facilitate future investment in projects such as Bus Connects, Dart +, and new rail stations. As part of the development of each Priority Development Area, it is considered essential that these sites are developed in a cohesive and coordinated manner to ensure that the emerging urban centre becomes a vibrant and integrated whole, rather than remaining fragmented by existing industrial uses.

v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

The subject lands have been explicitly identified for regeneration due to their location with regard to the core of the urban settlement, their serviced nature and the fact that they have excellent public transport connections, both existing and planned. There are no more suitable alternative lands for the particular mixed use residential and employment led regeneration identified in the SURF.

3. 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 SFRA sets out a strategic approach to managing fluvial, pluvial and canal-related flood risk across the SURF lands. Flood risk is primarily associated with the River Camac with affected areas lying largely within Flood Zone B. The Camac Flood Alleviation Scheme (FAS) will provide more robust modelling of the pre-scheme Flood Zones and will develop defences for this area.

The land uses within the Priority Development Areas are identified for mixed use not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels.

The amended SURF SWRM2 policy requires development proposals to take account of the vulnerability classification of proposed land uses as set out in Table 3.1 of The Planning System and Flood Risk Management Guidelines for Planning Authorities (OPW/DEHLG, 2009). In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone B classification.

The SURF SWRM1 objectives for surface water/rainwater management require the preparation of a rainwater management plan for each PDA or neighbourhood area and require the use of SuDS measures to reduce runoff to watercourses.

Together, these measures demonstrate that flood risk can be managed appropriately through implementation of the policies and objectives of the SURF, and that development will not cause unacceptable adverse impacts elsewhere.

Conclusion: The Justification Test for Development Plans has been applied and satisfied. The SURF demonstrates that development of the lands will enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS.

7.3 Red Cow and Cherry Orchard PDA Justification Test – Area 2

The SDCC development plan 2022-2028 has zoned this part of the Red Cow and Cherry Orchard PDA for employment led mixed use regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. The key element of the proposed land use within City Edge is that all categories are mixed use, with the use emphasis varying from category-to-category e.g. Res Led Mixed Use, Employment Led Mixed Use etc. This zoning is compatible with the proposed PDA structure.

The development proposed in flood zone B consists of employment led mixed use development which is categorised as less vulnerable development and is appropriate in flood zone B. Part of this area is in flood zone A and the proposed employment led mixed use development requires justification test in this area. Area 2 for the justification test is the employment led zoning in flood zone A as shown in Figure 7-3.

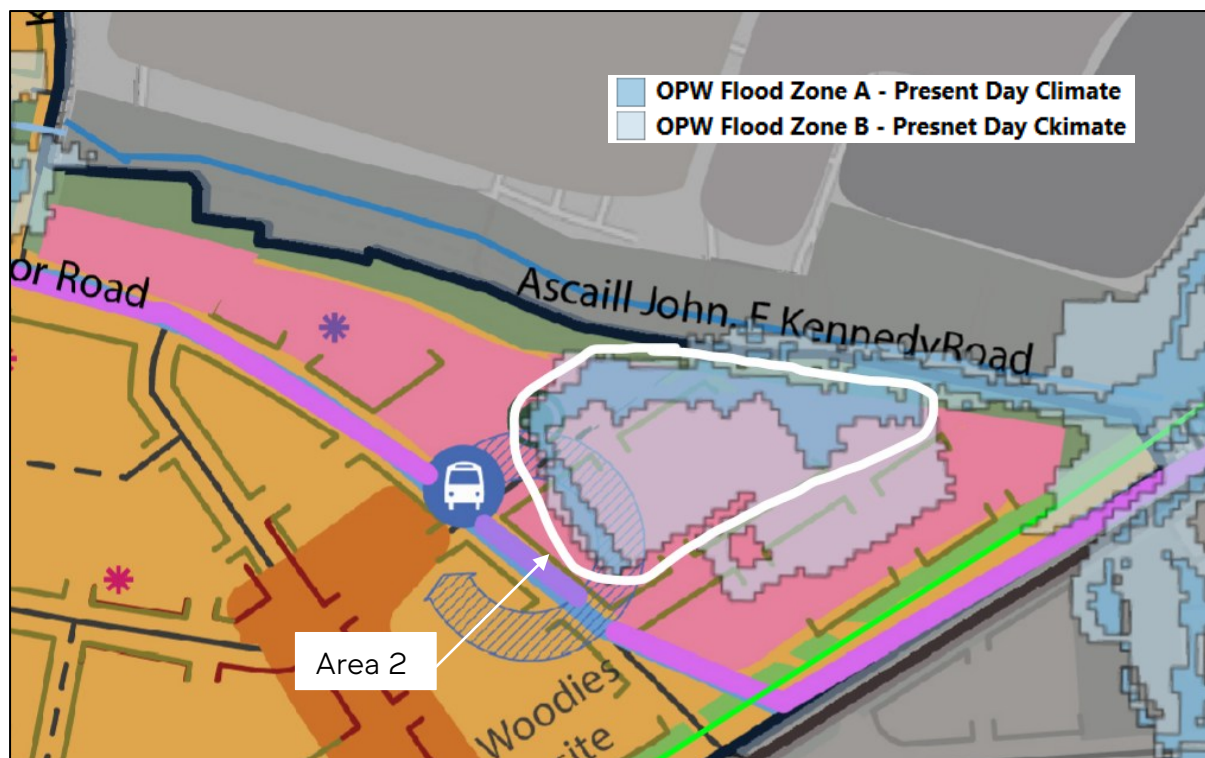


Figure 7-3: Area 2 of the Red Cow Cherry Orchard PDA current climate scenario flood zones

JUSTIFICATION TEST FOR DEVELOPMENT PLANS	
1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The proposed urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy and the South Dublin County Development Plan (2022-2028). As noted in Section 6.3 of this report, the area has been identified in the Metropolitan Area Strategic Plan (MASP) of the Regional Spatial and Economic Strategy for the Eastern and Midlands Regions (RSES) for strategic brownfield regeneration and in particular

that the Naas Road /Ballymount area has significant brownfield lands in South Dublin County Council area, with potential for residential development and more intensive employment/mixed uses

The SDCC development plan 2022-2028 identifies the City Edge area as a mixed use regeneration area and includes:

CS2 Objective 1: To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road / Ballymount as defined by the City Edge Project boundary. The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The City Edge Strategic Framework will inform this Statutory Plan.

The City Edge SURF fulfils the requirements of CS2 Objective 1 above.

2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:

i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;

The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.

ii. Comprises significant previously developed and/or under-utilised lands;

The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of serviced brownfield lands to deliver higher intensity urban regeneration, the subject lands need to be regenerated and should include a significant quantum of residential and more intensive employment land use.

iii. Is within or adjoining the core of an established or designated urban settlement;

City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan.

iv. Will be essential in achieving compact and sustainable urban growth;

As indicated by their designation at national, regional and local levels, the subject lands, being primarily under-utilised industrial and semi-industrial brownfield lands, are essential to achieving compact and sustainable urban growth. The redevelopment of this area will ensure the efficient use of public investment in infrastructure to date, including the Luas Red line, the Kildare Rail line, Grand Canal greenway etc. and will help to support and facilitate future investment in projects such as Bus Connects, Dart +, and new rail stations. As part of the development of each Priority Development Area, it is considered essential that these sites are developed in a cohesive and coordinated manner to ensure that the emerging urban centre becomes a vibrant and integrated whole, rather than remaining fragmented by existing industrial uses.

v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

The subject lands have been explicitly identified for regeneration due to their location with regard to the core of the urban settlement, their serviced nature and the fact that they have excellent public transport connections, both existing and planned. There are no more suitable alternative lands for the particular mixed use residential and employment led regeneration identified in the SURF.

3. 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 SFRA sets out a strategic approach to managing fluvial, pluvial and canal-related flood risk across the SURF lands. Flood risk is primarily associated with the River Camac with affected areas lying largely within Flood Zone A. The ongoing Camac Flood Alleviation Scheme (FAS) will provide more robust modelling of the pre-scheme Flood Zones and will develop defences for this area.

The land uses within the Priority Development Areas are identified for mixed use not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels.

The amended SURF SWRM2 policy requires development proposals to take account of the vulnerability classification of proposed land uses as set out in Table 3.1 of The Planning System and Flood Risk Management Guidelines for Planning Authorities (OPW/DEHLG, 2009). In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone A classification.

The SURF SWRM1 objectives for surface water/rainwater management require the preparation of a rainwater management plan for each PDA or neighbourhood area and require the use of SuDS measures to reduce runoff to watercourses.

Together, these measures demonstrate that flood risk can be managed appropriately through implementation of the policies and objectives of the SURF, and that development will not cause unacceptable adverse impacts elsewhere.

Conclusion: The Justification Test for Development Plans has been applied and satisfied. The SURF demonstrates that development of the lands will enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS.

7.4 Long Mile PDA Justification Test – Area 3

The SDCC development plan 2022-2028 has zoned this part of the Long Mile PDA for employment led mixed use regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. The key element of the proposed land use within City Edge is that all categories are mixed use, with the use emphasis varying from category-to-category e.g. Res Led Mixed Use, Employment Led Mixed Use etc. This zoning is compatible with the proposed PDA structure.

The development proposed in flood zone B consists of employment led mixed use development which is categorised as less vulnerable development and is appropriate in flood zone B. Part of this employment led development is also proposed in flood zone A and this requires justification test.

7.5 Area 3 for the justification test is the employment led zoning in flood zone A as shown in Figure 7-4.

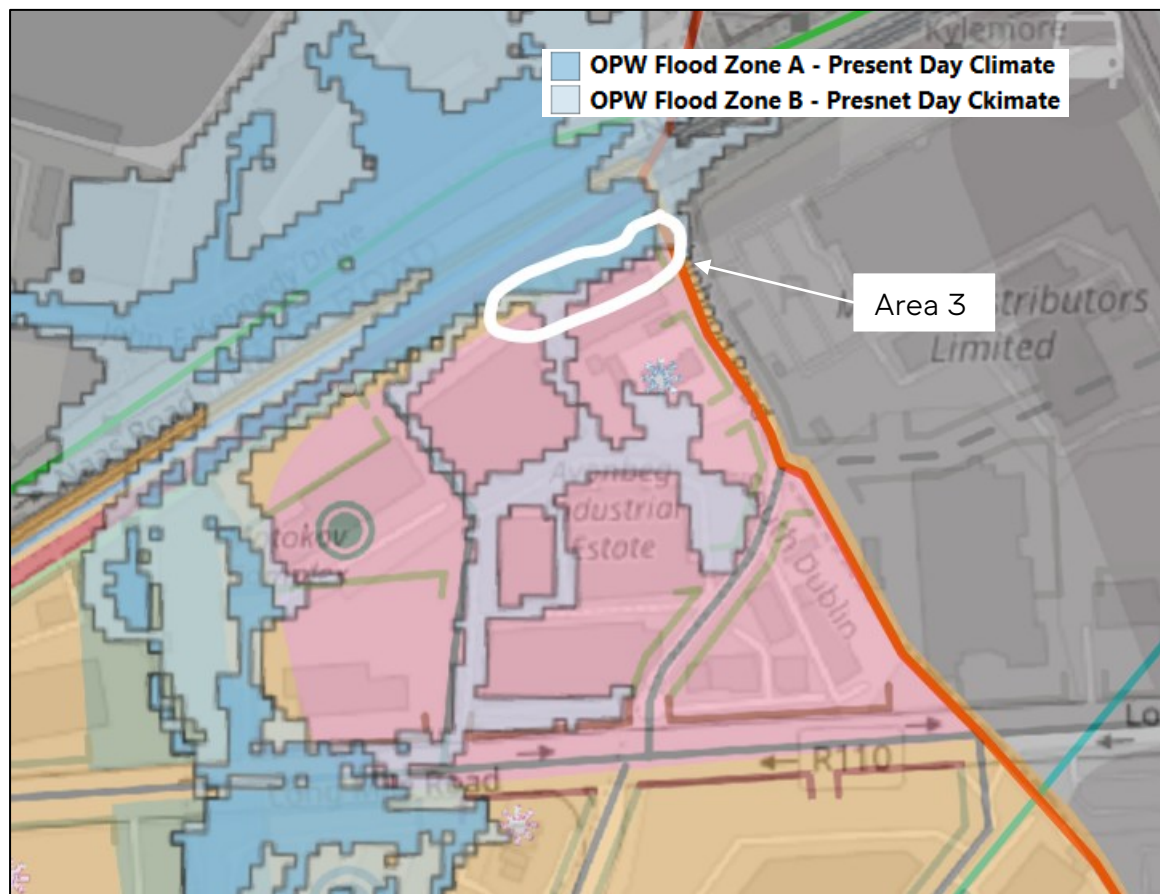


Figure 7-4: Area 3 in the Long Mile PDA with current climate scenario flood zones

JUSTIFICATION TEST FOR DEVELOPMENT PLANS

1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.

The proposed urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy and the South Dublin County Development Plan (2022-2028).

As noted in Section 6.3 of this report, the area has been identified in the Metropolitan Area Strategic Plan (MASP) of the Regional Spatial and Economic Strategy for the Eastern and Midlands Regions (RSES) for strategic brownfield regeneration and in particular that the Naas Road /Ballymount area has significant brownfield lands in South Dublin County Council area, with potential for residential development and more intensive employment/mixed uses

The SDCC development plan 2022-2028 identifies the City Edge area as a mixed use regeneration area and includes:
CS2 Objective 1: To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road / Ballymount as defined by the City Edge Project boundary. The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The City Edge Strategic Framework will inform this Statutory Plan.
The City Edge SURF fulfils the requirements of CS2 Objective 1 above.

2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:

i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;

The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.

ii. Comprises significant previously developed and/or under-utilised lands;

The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of serviced brownfield lands to deliver higher intensity urban regeneration, the subject lands need to be regenerated and should include a significant quantum of residential and more intensive employment land use.

iii. Is within or adjoining the core of an established or designated urban settlement;

City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan.

iv. Will be essential in achieving compact and sustainable urban growth;

As indicated by their designation at national, regional and local levels, the subject lands, being primarily under-utilised industrial and semi-industrial brownfield lands, are essential to achieving compact and sustainable urban growth. The redevelopment of this area will ensure the efficient use of public investment in infrastructure to date, including the Luas Red line, the Kildare Rail line, Grand Canal greenway etc. and will help to support and facilitate future investment in projects such as Bus Connects, Dart +, and new rail stations. As part of the development of each Priority Development Area, it is considered essential that these sites are developed in a cohesive and coordinated manner to ensure that the emerging urban centre becomes a vibrant and integrated whole, rather than remaining fragmented by existing industrial uses.

v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

The subject lands have been explicitly identified for regeneration due to their location with regard to the core of the urban settlement, their serviced nature and the fact that they have excellent public transport connections, both existing and planned. There are no suitable alternative lands for the particular mixed use residential and employment led regeneration identified in the SURF.

3. 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 SFRA sets out a strategic approach to managing fluvial, pluvial and canal-related flood risk across the SURF lands. Flood risk is primarily associated with the Ballymount Stream and the River Camac with affected areas lying largely within Flood Zone A. The ongoing Camac Flood Alleviation Scheme (FAS) will provide more robust modelling of the pre-scheme Flood Zones and will develop defences for this area.

The land uses within the Priority Development Areas are identified for mixed use not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels.

The amended SURF SWRM2 policy requires development proposals to take account of the vulnerability classification of proposed land uses as set out in Table 3.1 of The Planning System and Flood Risk Management Guidelines for Planning Authorities (OPW/DEHLG, 2009). In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone A classification.

The SURF SWRM1 objectives for surface water/rainwater management require the preparation of a rainwater management plan for each PDA or neighbourhood area and require the use of SuDS measures to reduce runoff to watercourses.

Together, these measures demonstrate that flood risk can be managed appropriately through implementation of the policies and objectives of the SURF, and that development will not cause unacceptable adverse impacts elsewhere

Conclusion: The Justification Test for Development Plans has been applied and satisfied. The SURF demonstrates that development of the lands will enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS.

7.6 Long Mile PDA Justification Test – Area 4

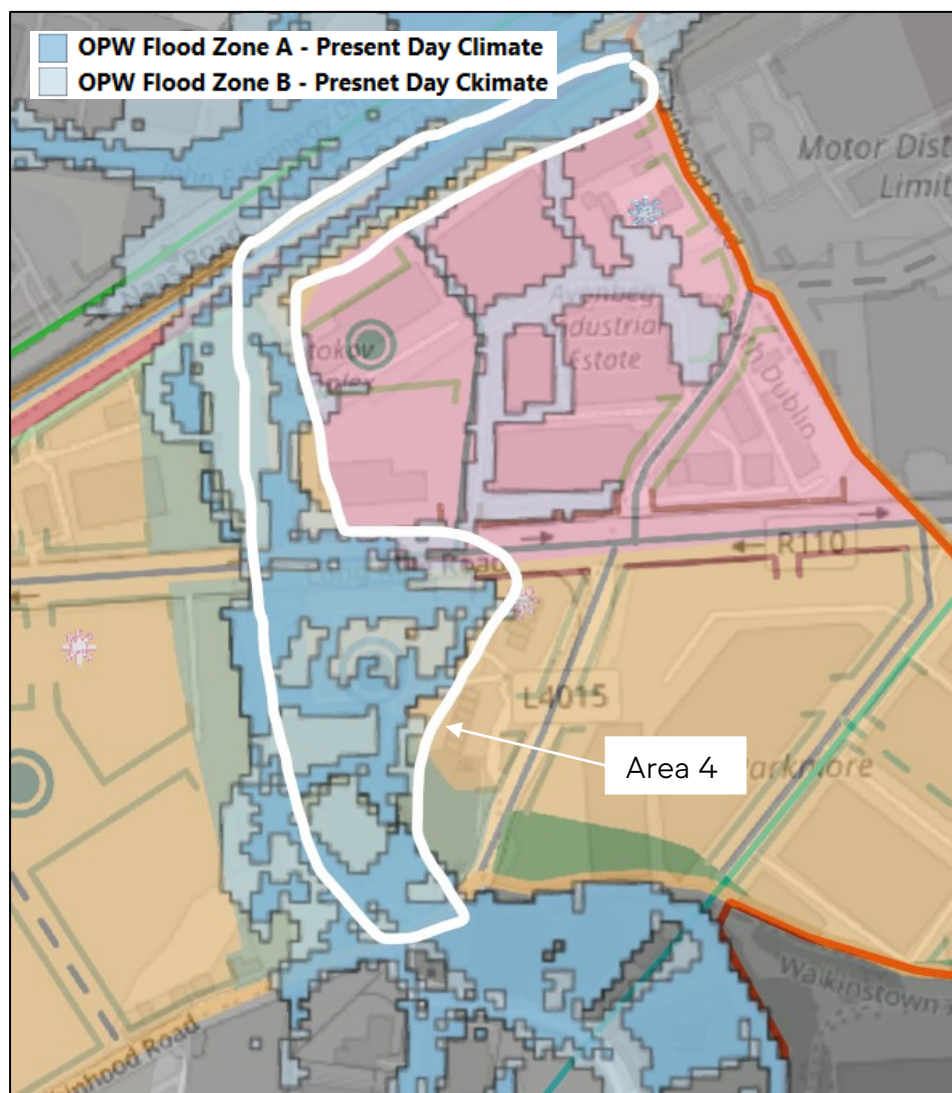


Figure 7-5: Area 4 in the Long Mile PDA with current climate scenario flood zones

The SDCC development plan 2022-2028 has zoned this part of the Long Mile PDA for employment led mixed use regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery. The key element of the proposed land use within City Edge is that all categories are mixed use, with the use emphasis varying from category-to-category e.g. Res Led Mixed Use, Employment Led Mixed Use etc. This zoning is compatible with the proposed PDA structure.

The development proposed in flood zone A and B consists of residential led mixed use development which is categorised as highly vulnerable development requires justification test in this area.

Area 4 for the justification test is the residential led zoning in flood zone A and B as shown in Figure 7-5.

JUSTIFICATION TEST FOR DEVELOPMENT PLANS					
1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The proposed urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy and the South Dublin County Development Plan (2022-2028). As noted in Section 6.3 of this report, the area has been identified in the Metropolitan Area Strategic Plan (MASP) of the Regional Spatial and Economic Strategy for the Eastern and Midlands Regions (RSES) for strategic brownfield regeneration and in particular that the Naas Road /Ballymount area has significant brownfield lands in South Dublin County Council area, with potential for residential development and more intensive employment/mixed uses The SDCC development plan 2022-2028 identifies the City Edge area as a mixed use regeneration area and includes: CS2 Objective 1: To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road / Ballymount as defined by the City Edge Project boundary. The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The City Edge Strategic Framework will inform this Statutory Plan. The City Edge SURF fulfils the requirements of CS2 Objective 1 above.				
2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	<table border="1"> <tr> <td data-bbox="197 1177 2027 1209">i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;</td><td data-bbox="197 1209 2027 1273">The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.</td></tr> <tr> <td data-bbox="197 1273 2027 1305">ii. Comprises significant previously developed and/or under-utilised lands;</td><td data-bbox="197 1305 2027 1374">The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of</td></tr> </table>	i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	The subject Site is Zoned REGEN. The SURF expands upon the range of regeneration uses within the site.	ii. Comprises significant previously developed and/or under-utilised lands;	The subject lands are primarily industrial or semi-industrial lands that are developed at a relatively low intensity with little to no residential land use. Having regard to the requirement under national, regional and local plans for the regeneration of
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serviced brownfield lands to deliver higher intensity urban regeneration, the subject lands need to be regenerated and should include a significant quantum of residential and more intensive employment land use.
iii. Is within or adjoining the core of an established or designated urban settlement;
City Edge Area is designated within the RSES's South-Western Development Corridor for urban consolidation and capacity is also identified for urban development under the core strategies contained in the SDCC Development Plan.
iv. Will be essential in achieving compact and sustainable urban growth;
As indicated by their designation at national, regional and local levels, the subject lands, being primarily under-utilised industrial and semi-industrial brownfield lands, are essential to achieving compact and sustainable urban growth. The redevelopment of this area will ensure the efficient use of public investment in infrastructure to date, including the Luas Red line, the Kildare Rail line, Grand Canal greenway etc. and will help to support and facilitate future investment in projects such as Bus Connects, Dart +, and new rail stations. As part of the development of each Priority Development Area, it is considered essential that these sites are developed in a cohesive and coordinated manner to ensure that the emerging urban centre becomes a vibrant and integrated whole, rather than remaining fragmented by existing industrial uses.
v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.
The subject lands have been explicitly identified for regeneration due to their location with regard to the core of the urban settlement, their serviced nature and the fact that they have excellent public transport connections, both existing and planned. There are no suitable alternative lands for the particular mixed use residential and employment led regeneration identified in the SURF.
3. 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 SFRA sets out a strategic approach to managing fluvial, pluvial and canal-related flood risk across the SURF lands. Flood risk is primarily associated with the Ballymount Stream and the River Camac with affected areas lying largely within Flood Zone A and B. The ongoing Camac Flood Alleviation Scheme (FAS) will provide more robust modelling of the pre-scheme Flood Zones and will develop defences for this area. The land uses within the Priority Development Areas are identified for mixed use not solely residential or employment use, thereby providing for less vulnerable uses to be accommodated at lower floor levels. The amended SURF SWRM2 policy requires development proposals to take account of the vulnerability classification of proposed land uses as set out in Table 3.1 of The Planning System and Flood Risk Management Guidelines for Planning Authorities

(OPW/DEHLG, 2009). In areas of flood risk this will mean that ground floor uses will be required to be compatible with the flood zone A classification.

The SURF SWRM1 objectives for surface water/rainwater management require the preparation of a rainwater management plan for each PDA or neighbourhood area and require the use of SuDS measures to reduce runoff to watercourses.

Together, these measures demonstrate that flood risk can be managed appropriately by requiring appropriate land uses for the ground floors of buildings and through implementation of the policies and objectives of the SURF, and that development will not cause unacceptable adverse impacts elsewhere

Conclusion: The Justification Test for Development Plans has been applied and satisfied. The SURF demonstrates that development of the lands will enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS.

The current scenario flood maps show no areas of the PDA within flood zone A or B and therefore no justification test is required for any part of this PDA.

7.8 Conclusions

The Justification Test for Development Plans has been applied to the City Edge SURF PDAs and has been satisfied. This is due to the land uses within the Priority Development Areas being zoned for mixed use not solely residential or employment use, thereby providing for lower vulnerability uses to be accommodated at lower floor levels

The SURF demonstrates that development of the lands in these areas enable compact and sustainable regeneration while appropriately managing flood risk. The SFRA is an iterative document and will be updated pending further pre-scheme results from the Camac FAS. Site specific FRAs for individual developments will be carried out where the development is proposed in a flood risk area, and further justification testing will be applied during the site specific FRAs where necessary.