

Proposed Amendment No. 1

December 2016

Strategic Flood Risk Assessment



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1.0 Introduction

The Initial Strategic Flood Risk Assessment of the Ballycullen Oldcourt Local Area Plan (LAP) was undertaken by South Dublin County Council in parallel to the production of the LAP in 2014. This assessment was a requirement for Local Area Plans as set out in *The Planning System and Flood Risk Management – Guidelines for Planning Authorities* (2009). The SFRA reviewed the requirements of the Guidelines, the existing policies of the Regional Authority and *South Dublin County Council Development Plan 2010 – 2016*. All available information on the potential Flood Risk i.e. the OPW's Preliminary Flood Risk Assessment modelling, stream catchments, flooding events and site walk-through were outlined. Local area flood reports available on the OPW's National Flood Mapping website were also reviewed. All of this information was utilised by the LAP team in drawing up a Sustainable Urban Drainage strategy for the plan lands and in formulating a series of objectives that are embedded within the LAP.

2.0 Proposed Amendment No.1 to Ballycullen-Oldcourt Local Area Plan

The Ballycullen - Oldcourt Local Area Plan's phasing strategy sets out thresholds for housing in each development phase and identifies the key outcomes required prior to the initiation of the next development phase. The threshold for housing provision has been reached under Phase 1 of the western side of the plan lands.

Notwithstanding the significant demand for housing in the area, the requirement under Phase 2 of the western side of the plan lands for the completion and operation of the first of two proposed primary schools in the Local Area Plan lands has restricted the delivery of housing in the area.

In order for this key element of community infrastructure to be provided, it necessitates an amendment to the Ballycullen-Oldcourt Local Area Plan. The Proposed Amendment will compromise of:

- Relocation of the requirement for the first primary school from Phase 2 to Phase 3 of the plan's phasing strategy, as well as providing for a new phase 4, which will align the provision of the second primary school with an appropriate quantum of housing.

There are no additional adverse effects arising from the Proposed Amendment that were not envisaged and mitigated by the SFRA for the Plan. The SEA, AA and SFRA process for the Plan successfully facilitated the integration of mitigation into the Plan in order to contribute towards the protection of the environment. The full text of the Proposed Amendment No. 1 is provided in Appendix 1.

3.0 Strategic Flood Risk Assessment for South Dublin County Development Plan 2016-2022

South Dublin County Council (SDCC) commenced a review the existing 2010-2016 County Development Plan and the preparation of a new County Development Plan for

the period 2016–2022 in September 2014. As part of this review process, a Strategic Flood Risk Assessment was prepared.

A Stage 1 Flood Risk Identification was undertaken to identify any flooding or surface water management issues related to the County that may warrant further investigation. As part of this stage the best available data at the time of preparation was acquired from the Office of Public Works (OPW) Eastern Catchment Flood Risk Assessment Management (CFRAM) Study. The Eastern CFRAM generated draft flood zone mapping which was deemed suitable as a Stage 2 Initial Flood Risk Assessment. This flood risk information enabled SDCC to apply the sequential approach (requirements of “*The Planning System and Flood Risk Assessment Guidelines for Planning Authorities*” (2009) and Circular PL02/2014 (August 2014)) and where necessary the Justification Test, to appraise sites for suitable land zonings and identify how flood risk can be managed as part of the Development Plan

As part of the Justification Test, the lands at Ballycullen-Oldcourt were reviewed (see Appendix 2 attached). The SFRA stated the Ballycullen - Oldcourt Local Area Plan 2014 was prepared having regard to the best available flood data (OPW PFRA) at the time and consideration of the land use strategy and objectives in the LAP included for directing water compatible elements in Flood Zones. It concluded that the Ballycullen-Oldcourt Local Area Plan lands satisfied the required criteria in the Justification Test with regards to the zoning of the lands for development.

4.0 Conclusion

The Proposed Amendment No. 1 to the Ballycullen-Oldcourt Local Area Plan relates only to amendments to phasing requirements for the Plan lands i.e. the delivery of schools at various phases. The policies and objectives of the Local Area Plan, which was subject to an initial SFRA as part of the Plan process and further reviewed in the SFRA for the County Development Plan 2016-2022, are unchanged. All necessary mitigation measures successfully integrated into the Plan during the SEA, AA and SFRA process remain unchanged as a result of the Proposed Amendment No.1. Therefore it is considered that all concerns raised during the Plan process in relation to flood risk have been addressed in both the Local Area Plan and the County Development Plan and are not impacted by the Proposed Amendment.

Appendix 1
Proposed Amendment No. 1 Ballycullen- Oldcourt Local
Area Plan 2014

Proposed Amendment No. 1 to Ballycullen Oldcourt Local Area Plan

This document presents details of the proposed amendment to the Ballycullen – Oldcourt Local Area Plan (2014). The proposed amendment is identified as a series of changes to the phasing requirements of the plan and relate principally to Section 6.3.2 of the Plan.

Where appropriate, extracts of text before and after the proposed amendment are included in order to present the amendment within their context. It is only the proposed changes that submissions or observations can be made upon and not the contextual information.

The proposed changes to text and maps / figures are structured to follow the sequence of the adopted Local Area Plan. This document should therefore be read in conjunction with the relevant sections of the Ballycullen – Oldcourt Local Area Plan as adopted in 2014.

Each amendment is designated with a unique reference number and is accompanied by the relevant section / figure and page number of the Local Area Plan to which the proposed amendment relates.

The nature and extent of the proposed amendment are identified as follows:

- Proposed alterations involving additional text are shown in green.
- Proposed alterations involving deletion of text are shown in ~~red-strikethrough~~.

Amendment Ref No. PA01	
Section Ref.	Page Ref.
6.3.1 Eastern Side of Plan Lands	38

6.3.1 Eastern Side of Plan Lands

PHASE ONE*	
Key Development	260 dwellings (if all permitted developments are modified in accordance with this Local Area Plan) ^a
Key Outcomes Required before Next Phase	<ul style="list-style-type: none"> • Knocklyon Park Extension to include link to existing parkland/playing pitches to the north-east, upgrade of roundabout junction to four arm junction and 1 x NEAP (see Appendix 2 of LAP) • Commencement of construction of a school on the designated primary school site on the eastern side of the Plan Lands OR on the designated primary school site on the western side of the Plan Lands^b • Site made available for construction of a Primary School on the eastern or western side of the Plan Lands • Commencement of construction of Stocking Wood Neighbourhood and Community Centre to include at least 190 sq.m of community floorspace, at least 270 sq.m of childcare floorspace, convenience shopping (not exceeding 1,500 sq.m gross) and a bus lay-by^c
Rationale	<p>A substantial number of dwellings have been constructed on the eastern side of the Plan Lands with little or no public open space, local convenience shopping, bus stop facilities, community facilities, childcare facilities or play facilities. To provide primarily for the needs of existing residents, these amenities must be provided prior to or in tandem with the construction of any further housing in the area.</p> <p>A primary school is also required to meet the existing population needs of the Plan Lands and its surrounding suburban hinterland.</p>

** Phase One on the eastern side of the Plan Lands includes development sites that are subject to existing permissions but is not exclusive to such lands.

Amendment Ref No. PA02	
Section Ref.	Page Ref.
6.3.1 Eastern Side of Plan Lands	38

PHASE TWO	
Key Development	150 dwellings
Key Outcomes Required before Next Phase	<ul style="list-style-type: none"> • Completion of Neighbourhood and Community Centre to include at least 190 sq.m of community floorspace in addition to the minimum quantum set out under Phase One (at least 460 sq.m community floorspace total) and upgrade of roundabout junction to four arm junction with crossing facilities^c • Completion and operation of a primary school on either of the two designated primary school sites within the Plan Lands^b • Site made available for construction of a Primary School on the eastern or western side of the Plan Lands • Commencement of landscaping of Green Buffer with tracks and trails along southern boundary with mountains
Rationale	Further community and neighbourhood facilities will be required to meet the needs of further residents on the eastern side of the Plan Lands as they continue to develop. A school will also need to be in place.

Amendment Ref No. PA03	
Section Ref.	Page Ref.
6.3.1 Eastern Side of Plan Lands	38

PHASE THREE	
Key Development	Completion of balance of permissible residential development on eastern side of Plan Lands- approx. 210 dwellings 150 dwellings ^d
Key Outcome Required Before Completion of Phase	<ul style="list-style-type: none"> • Site made available for construction of a second primary school on the remaining designated primary school on the eastern or western side of the Plan Lands^b • Completion of landscaping of Green Buffer with tracks and trails along southern boundary with mountains • Commencement of planning process for the provision of a school on the designated primary school site on the eastern side of the Plan Lands OR on the designated primary school site on the western side of the Plan Lands.
Rationale	Two primary schools and parkland facilities will be required to meet the existing and future population needs of the Plan Lands and its surrounding suburban hinterland. Green buffers must be in place before the lands are fully developed particular the partially developed eastern side of the Plan Lands.

	Parkland facilities will be required to meet the existing and future population needs of the Plan Lands and its surrounding suburban hinterland. A Primary School is also required to meet the existing and new population needs of the Plan Lands and its surrounding suburban hinterland.
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Amendment Ref No. PA04	
Section Ref.	Page Ref.
6.3.1 Eastern Side of Plan Lands	38

PHASE FOUR	
Key Development	Completion of balance of permissible residential development on eastern side of Plan Lands - approx. 60 dwellings ^d
Key Outcomes Required Before Next Phase	<ul style="list-style-type: none"> Commencement of construction of the designated Primary Schools on the eastern and western side of the Plan Lands
Rationale	Two primary schools will be required to meet the existing and new population needs of the Plan Lands and its surrounding suburban hinterland.

Amendment Ref No. PA05	
Section Ref.	Page Ref.
6.3.2 Western Side of Plan Lands	39

6.3.2 Western Side of Plan Lands

PHASE ONE	
Key Development	Option A (relocation of 220 kV lines) – 200 dwellings Option B (retention of existing 220 kV lines) – 150 dwellings
Key Outcomes Required Before Next Phase	<ul style="list-style-type: none"> Commencement of works on Gunny Hill playing pitches including access 1 x NEAP on western side of Plan Lands (see Appendix 2 of LAP) Commencement of construction of a school on the designated primary school site on the eastern side of the Plan Lands OR on the designated primary school site on the western side of the Plan Lands^b Site made available for construction of a Primary School on the eastern or western side of the Plan Lands
Rationale	Public open space and children's play facilities will be required to serve new housing development on the western side of the Plan Lands. A primary school is also required to meet the existing population needs of the Plan Lands and its surrounding suburban hinterland.

Amendment Ref No. PA06	
Section Ref.	Page Ref.
6.3.2 Western Side of Plan Lands	39

PHASE TWO	
Key Development	Option A (relocation of 220 kV lines) – 300 dwellings Option B (retention of existing 220 kV lines) – 220 dwellings
Key Outcomes Required Before Next Phase	<ul style="list-style-type: none"> • Completion of Gunny Hill playing pitches including access • Completion and operation of a primary school on either of the two designated primary school sites within the Plan Lands^b • Site made available for construction of a Primary School on the eastern or western side of the Plan Lands • Commencement of landscaping of Oldcourt Park with access and 1 additional NEAP for western side of Plan Lands • The provision of a minimum of 300 sq.m. of community floorspace
Rationale	Public open space and children's play facilities will be required to serve new housing development on the western side of the Plan Lands.

Amendment Ref No. PA07	
Section Ref.	Page Ref.
6.3.2 Western Side of Plan Lands	39

PHASE THREE	
Key Development	Completion of balance of permissible residential development on western side of Plan Lands: Option A (relocation of 220 kV lines) – approx. 460 dwellings 350 dwellings Option B (retention of existing 220 kV lines) – approx. 460 dwellings 350 dwellings
Key Outcomes Required Before Next Phase	<ul style="list-style-type: none"> • Site made available for construction of a second primary school on the remaining designated primary school on the eastern and western side of the Plan Lands • Completion of Oldcourt Park • Commencement of planning process for the provision of a school on the designated primary school site on the eastern side of the Plan Lands OR on the designated primary school site on the western side of the Plan Lands.
Rationale	Two primary schools and parkland facilities will be required to meet the existing and future population needs of the Plan Lands and its surrounding suburban hinterland. Parkland facilities will be required to meet the existing and future population needs of the Plan Lands and its surrounding suburban hinterland. A Primary School is also required to meet the existing and new population needs of the Plan Lands

	and its surrounding suburban hinterland.
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Amendment Ref No. PA08	
Section Ref.	Page Ref.
6.3.2 Western Side of Plan Lands	39

PHASE FOUR	
Key Development	Completion of balance of permissible residential development on western side of Plan Lands: ^d Option A (relocation of 220 kV lines) – approx. 110 dwellings Option B (retention of existing 220 kV lines) – approx. 110 dwellings
Key Outcomes Required Before Next Phase	<ul style="list-style-type: none"> Commencement of construction of the designated Primary Schools on the eastern and western side of the Plan Lands
Rationale	Two Primary Schools will be required to meet the existing and new population needs of the Plan Lands and its surrounding suburban hinterland.

Amendment Ref No. PA09	
Section Ref.	Page Ref.
6.3.2 Western Side of Plan Lands	39

^a Extant Planning Permissions

It is possible that 1,180* dwellings could be built on the eastern side of the Plan Lands if all extant permission for residential development were to be fully built or completed prior to their expiration. The densities, layouts and dwelling-types of these permitted developments are not in keeping with the objectives of this plan and would require extensive engineered solutions that would not be in accordance with SUDS principles. Some of these permissions are close to expiry. Furthermore, aspects of the permitted developments may no longer be viable under the current housing market and economic climate. New applications lodged for development on these sites would be looked upon favourably, provided that:

- They adhere to the density and housing mix requirements contained within the Plan
- They comply with the SUDS requirements of the Plan
- Applications for development includes for the Knocklyon Park Extension and a Neighbourhood and Community Facility.

*Figure includes recently expired permission on Ballycullen Partnership Site.

^b Primary School Provision

Two primary schools sites are designated under this LAP to cater for the existing population demands of the surrounding area and the future population demands of the Plan Lands. Further to a Material Alteration of the Local Area Plan, the Oldcourt/Gunny Hill School Site has been increased by 1.2 acres to allow for a third school site. The Phasing Strategy provides the option of constructing the first primary school on either of the two school sites initially designated to serve the Plan Lands be it on the eastern or western side of the Plan Lands. Development on the eastern and western sides of the Plan Lands shall not enter into their third phases until ~~at least one primary school has been constructed and is fully operational~~ the commencement of the planning process for a school on the designated

primary school site on the eastern side of the Plan Lands OR on the designated primary school site on the western side of the Plan Lands.

^c Community Floorspace

Based on Option A (see tables presented overleaf), a total of 680 sq.m of community floorspace is required to serve the existing and future population needs of the Plan Lands. This includes for at least 190 sq.m of community floorspace to serve existing dwelling on the eastern side of the Plan Lands. The required floorspace quantum is calculated at a rate of 3 sq.m per 10 dwellings. Floorspace on the eastern side of the Plan Lands shall be provided within the planned Stocking Wood Neighbourhood/Community Centre. Floorspace on the western side shall be co-located with the permitted discount foodstore.

^d Residential Development

For the purposes of phasing assessment and in the interest of clarity, a residential unit will be defined as completed when a Certificate of Compliance on Completion (CCC), where required, has been submitted via the Building Control and Management System (BCMS), validated, and particulars entered on the Register.

Appendix 2
Extract from the SFRA for the South Dublin County
Council Development Plan 2016-2022

Ballycullen - Oldcourt Local Area Plan Lands

The subject lands are zoned 'A1' in the 2010 – 2016 Development Plan and as such, are generally categorised as undeveloped, zoned lands at risk of flooding. Ballycullen - Oldcourt is an area within the Metropolitan Consolidation Area of the Dublin Gateway as identified under the Regional Planning Guidelines. Objective RES-N 'to provide for new residential communities in accordance with the appropriateness of the RES-N zoning at Ballycullen - Oldcourt, the sequential approach has been applied, which has culminated in application of the Justification Test. It is a requirement under the Planning and Development Act 2000 (as amended) for the County Development Plan including its Core Strategy to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 and to ensure that there are sufficient and suitable lands zoned to meet the population and housing requirements for the County. The Core Strategy in the Draft Plan identifies a growth in population of over 26,300 people and a need for over 32,000 dwellings during the lifetimes of the County Development Plan and it is a requirement to ensure that enough lands are zoned for such need and in appropriate places.

Ballycullen - Oldcourt is an area within the Metropolitan Consolidation Area of the Dublin Gateway as identified under the Regional Planning Guidelines. It is policy of the Regional Planning Guidelines (RPGs) to gain maximum benefit from existing assets in the Metropolitan Consolidation Area, including public transport and social infrastructure, through consolidation within the existing built footprint of the City and the Inner Suburbs. This is seen as particularly important as falling occupancy levels and aging populations are placing the viability existing services and facilities such as schools across the Metropolitan Area at risk.

As such, it is considered that there are no alternative unzoned lands available for significant development such as that envisaged at Ballycullen - Oldcourt with equivalent infrastructure and services. The Ballycullen - Oldcourt Local Area Plan 2014 was prepared having regard to the best available flood data (OPW PFRA) at the time and consideration of the land use strategy and objectives in the LAP included for directing water compatible elements in Flood Zones.

The LAP includes the following objectives:

- Objective GI8 - All planning applications for development in areas at risk of flooding shall be accompanied by a Flood Risk Assessment carried out at the site-specific level in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009). The scope of flood risk assessment should depend on the type and scale of development and the sensitivity of the area. Site specific flood risk assessment of lands identified as being at risk of flooding will entail Stage 3 Detailed Risk Assessment carried out by suitably qualified and independent hydrological consultants that are acceptable to the Council. Where avoidance of flood risk is not possible, vulnerable uses such as residential, community and commercial uses should be substituted with less vulnerable uses such as parks and open spaces.
- Objective GI9 - All proposals, particularly those within the catchment of the Ballycullen Stream, shall demonstrate and ensure that they do not increase the

risk/impact of flooding on downstream estates including Castlefield Manor, Glenvara, Glenlyon and Homeville.

- Objective SSP27 - Any proposed development on the Oldcourt GAA pitches that is potentially sensitive to flooding shall be subject to the sequential approach of avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks in accordance with The Planning System and Flood Risk Management– Guidelines for Planning Authorities (2009). These areas will require Site Specific Stage 3 Detailed Flood Risk Assessment including the likely impact of any displaced flood water on third parties. If it cannot be demonstrated that both the actual and residual flooding issues can be dealt with in an acceptable manner including the impact of any displaced flood water on third parties, then the development of these lands shall be confined to water compatible development only (in accordance with the precautionary approach) such as amenity spaces, outdoor sports and recreation spaces that include SUDS elements and integrate with the SUDS strategy for the Plan Lands. Any required works to upgrade or replace existing drainage systems or channels (such as culverts) upstream or downstream of a development shall be borne by the developer and shall adhere to SUDS principles.

The Guidelines state that where an 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, it must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning or designation for development will satisfy the 'Justification Test'.

Section 4.23 of the Flooding Guidelines relate to the 'Justification Test' and outline the three criteria that must be satisfied.

Criteria		Response
1.	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	<p>The National Spatial Strategy 2002-2022 is a twenty year plan for the Country and consolidating the Greater Dublin Area, a Gateway, is a primary policy of this Strategy.</p> <p>The Consolidation Area within the Gateway of Dublin is identified within the top tier of the settlement hierarchy in accordance with the Regional Planning Guidelines in order to promote the consolidation and sustainable intensification of the existing urban/built form thereby maximising efficiencies from establishing physical and social infrastructure.</p>
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:	
2(i)	Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	It is considered that the lands at Ballycullen - Oldcourt are essential to allow for growth and expansion of South Dublin in order to meet the targets as set out in the RPGs.
2(ii)	Comprises significant previously developed and/or under-utilised lands:	The subject lands consist of significant underutilised land suitable for a residential type development, proximate to the existing services.
2(iii)	Is within or adjoining the core of an established or designated urban settlement:	The lands at Ballycullen-Oldcourt fall within the Metropolitan Consolidation Area of the Dublin Gateway.
2(iv)	Will be essential in achieving compact and sustainable urban growth; and,	The future development of these lands will be in accordance with the approved Ballycullen – Oldcourt 2014 prepared in accordance with Ministerial guidance documents. The implementation of the LAP is essential in

		achieving compact and sustainable urban growth.
2(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.	There are no alternative unzoned lands available for significant development such as that envisaged at Ballycullen – Oldcourt with equivalent established infrastructure and services.
3.	<p>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.</p> <p>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.</p>	
	<p>A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The OPW Preliminary Flood Risk Assessment (PFRA) identified flood risk on a portion of the overall lands within the Ballycullen - Oldcourt LAP boundary. The RES-N lands within flood risk zones are undeveloped. The Ballycullen - Oldcourt Local Area Plan 2014 was prepared having regard to the best available flood data and consideration of the land use strategy in the LAP included for the flood risk and promotes a sequential approach to land uses in the Plan. A FRA of appropriate detail should accompany applications for development on this site to demonstrate that they would not have adverse flood risk impacts. The FRA should consider the following:</p> <ul style="list-style-type: none"> ▪ Development adjacent to the Ballycullen Stream should not be permitted until the completion of the planned Flood Alleviation Works ▪ The sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain. ▪ Development in Flood Zone A should primarily consist of water compatible development ▪ Highly Vulnerable Development shall not be permitted in Flood Zone A or B. ▪ Less Vulnerable Development may be considered in Flood Zone B but should incorporate flood resilient design principles ▪ FRAs for developments should demonstrate that finished floor levels are designed for the 1% AEP (1 in 100 year) flood level plus an allowance for climate change and a minimum freeboard of 300mm. FRAs should also examine residual risk associated with culvert blockages, and climate change to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths and does increase flood risk elsewhere. ▪ FRAs should also address surface water management for development, demonstrating consideration of GDSDS policies and incorporation of SuDS e.g. Green Roofs, Rainwater Harvesting and Permeable Surfacing. ▪ Compensatory storage for development that results in a loss of floodplain must be provided on a level for level basis and the land given to storage must be land which does not flood in the 1% AEP flood event. 	

