McCloy Consulting

Strategic Flood Risk Assessment for Proposed Variation no. 1

of the Fingal Development Plan 2023 - 2029

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Introduction

McCloy Consulting were appointed by Fingal County Council (CC) to undertake a Strategic Flood Risk Assessment (SFRA) with respect to Variation 1 of the Fingal County Development Plan 2023-2029.

As stated in the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004), a Strategic Environmental Assessment (SEA) must be prepared as part of any county development plan to assess the likely significant effects of the plan's implementation on the environment.

The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (the OPW Guidelines) recommend that an SFRA be prepared to support the SEA of a development plan to ensure that flood risk, where identified, is considered as one of the key environmental criteria against which the plan is assessed. The SFRA should ultimately inform policy and land use decisions in areas that have been assessed as being at risk of flooding.

Fingal CC has commenced the preparation of proposed variation no. 1 of the Fingal County Development Plan and is required to apply the SFRA criteria to the variation land zonings. Therefore, the preparation of the proposed variations has undergone an appropriate level of SFRA and this document sets out the findings for the proposed variation(s). New development will be required to comply with the flood risk management provisions from the County Development Plan.

Disclaimer

It is noted that this Variation SFRA is based on the approach and flood data outlined in the CDP SFRA, prepared in compliance with the requirements of the OPW Guidelines. As stated in the CDP SFRA, outputs from future studies and datasets may trigger a review and update of the SFRA during the lifetime of the 2023-2029 Development Plan. Accordingly, all information in relation to flood risk is provided for general policy guidance only and may be updated in light of future data and analysis, or future flood events.

As a result, all landowners and developers are advised that Fingal CC and their agents can accept no responsibility for losses or damages arising due to assessments of the vulnerability to flooding of lands, uses and developments. Owners, users and developers are advised to take all reasonable measures to assess the vulnerability to flooding of lands and buildings in which they have an interest prior to making planning or development decisions.

Proposed Variation No. 1 to the Fingal Development Plan

It is proposed to amend the text of the Fingal County Development Plan 2023-2029 Written Statement and Appendices. It is also proposed to change the land use zonings of a number of areas of lands as shown on the County Development Plan Map Sheets and to and amend development boundaries accordingly.

It is also proposed to replace the Long-Term Strategic Reserve designation with a Local Area Plan designation in relation to lands at Dunsink on development Plan Map Sheet 13.

The proposed rezonings are presented below in order of map sheet below with details provided as to the existing and proposed land use zoning objects for each individual area.

A total of 11 areas have been identified for rezoning as follows:

- Site 4.1 on Sheet 4 – School Lane, Balrothery: rezone from 'GB' Green Belt to 'RA' Residential Area and amend development boundary accordingly
- Site 5.1 on Sheet 5 – Holmpatrick, Skerries: rezone from 'GB' Green Belt and 'OS' Open Space to 'RA' Residential Area and amend development boundary accordingly
- Site 6A.1 on Sheet 6A – Causetown, Lusk: rezone from 'OS' Open Space and 'RU' Rural to 'RA' Residential Area and amend development boundary accordingly
- Site 6A.2 on Sheet 6A – Racecourse Road, Lusk: rezone from 'RU' Rural to 'RA' Residential Area and amend development boundary accordingly
- Site 9.1 on Sheet 9 – Seamount, Malahide: rezone from 'RU' Rural To 'RA' Residential Area, inclusion of new Local Objective A and amend development boundary accordingly

- Site 9.2 on Sheet 9 – Broomfield West, Malahide: rezone from 'GB' Green Belt To 'RA' Residential Area and amend development boundary accordingly
- Site 9.3 on Sheet 9 – Greenwood, Kinsealy: rezone from 'GB' Green Belt To: 'RV' Rural Village and amend development boundary accordingly
- Site 9.4 on Sheet 9 – Kinsealy Lane, Kinsealy: rezone from 'GB' Green Belt To: 'RV' Rural Village, inclusion of new Local Objective B and amend development boundary accordingly
- Site 9.5 on Sheet 9 – Hole in the Wall Road: rezone from 'GB' Green Belt To: 'RA' Residential Area and amend development boundary accordingly
- Site 13.1 on Sheet 13 – West of Barnhill, Dublin 15: rezone from 'GB' Green Belt To: 'RA' Residential Area and amend development boundary accordingly
- Site 13.2 on Sheet 13 – Clonsilla Road, Clonsilla: rezone from 'OS' Open Space To: 'RA' Residential Area and amend development boundary accordingly

The additional change relating to Map Sheet 13 in relation to lands at Dunsink include the following:

- Site 13.3 on Sheet 13 Strategic Land Reserve Designation: Replace Strategic Land Reserve Designation with Local Area Plan Objective

Maps of the areas listed above are provided in the Variation Maps Booklet which forms part of the proposed variation documentation.

Reason for the Proposed Variation

The existing Development Plan Core Strategy (which was prepared having regard to the requirements of the previous 'Housing Supply Target Methodology' Guidelines, 2020) provided sufficient residential zoned land to meet the original, adopted housing supply target.

However, the Revised NPF and the NPF Implementation Guidelines have set a new, higher housing target. They have also set a new potential allowance for additional zoned land provision of 50% above baseline requirements, which is based on a recognition by Government of the need to account for headroom and lands not activated.

As stated previously in this document, Policy and Objective 3 of the NPF Implementation Guidelines requires planning authorities to incorporate the objectives and targets set out in the Guidelines into City and County Development Plans as quickly as possible through the variation of adopted plans.

As Table 1 shows, when taken together, the previous targets for 2023-2024, alongside the new targets for 2025-2029 and planning for 50% additional provision, result in a total requirement of 29,126 for the whole Development Plan period.

Table 1: Identified Shortfall for Development Plan Period

New housing requirement 2025-2029 (150%)	Total Adopted CDP 2023-2024 plus 150% new 2025 to end 2029	Homes built Q2 2023 - Q3 2025	Requirement (150%) to 2029 minus delivery	Potential residential capacity to 2029	Total shortfall
23,650	29,126	6,770	22,356	17,723	4,633

A total of 6,770 new units have been completed under the current Development Plan (to Q3 2025), leaving 22,356 outstanding. With identified residential zoned land capacity (not including permissions) of 17,700, a shortfall of c. 4,600 is identified.

In order to maintain a robust supply of residential zoned land for development, it is recommended to provide for lands sufficient for approximately 5,000 new units, through the following measures:

- The re-zoning of additional lands not currently zoned for development, comprising 61.5 ha of land with capacity for approximately 2,500 units.
- Active land management comprising the progression of a statutory Local Area Plan for long-term strategic reserve lands at Dunsink, which will enable a limited portion of Dunsink lands with capacity for approximately 2,500 units) to be brought forward in the short term.
- Several consequential amendments to the Fingal County Development Plan arising from and supporting the above steps.

Note that this variation does not update the entire Plan in relation to other national and local policies, objectives and guidance which may have been made since the adoption of the Plan. Full regard will be given to such matters when the Plan is reviewed in its entirety in preparation of the next County Development Plan.

Flood Risk Guidance

Comprehensive flood risk guidance is set out in the CDP SFRA. The following are considered to be the primary aspects relevant to assessment of flood risk as part of the proposed variation. It is noted that there have been no significant / relevant updates to flood risk policy in Ireland since the current CDP SFRA was published.

Flood Zoning

The approach to assessment of flood risk throughout Fingal is set out in the CDP SFRA which presents flood mapping for the County. Flood mapping includes Flood Zone maps which identify the three classifications outlined in the OPW Guidelines:

- Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding).
- Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding).
- Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding).

Sequential Approach

The OPW Guidelines recommend a sequential approach to planning to ensure the core objectives of the guidelines are implemented. It is of particular importance at the plan making stage but is also applicable in the layout and design of development at the development management stage.

In general, most types of development would be considered inappropriate in Flood Zone A. In Flood Zone B highly vulnerable development (e.g., hospitals, dwelling houses and primary infrastructure) would be considered inappropriate but less vulnerable development (e.g., retail, commercial and industrial uses) might be considered appropriate. Development within Flood Zone C is appropriate from a flood risk perspective.

However, this preferred Sequential Approach is not always possible as many urban centres are affected by Flood Zones and are targeted for key social and economic development. To reflect this, the OPW Guidelines outline the Justification Test to facilitate assessment of the balance between consideration of flood risk issues and the need for continued development in towns and cities.

Justification Test

The Justification Test is a mechanism within the OPW Guidelines relevant to highly vulnerable and less vulnerable proposals in Flood Zone A and Flood Zone B. The Justification Test is designed to rigorously assess the appropriateness, or otherwise, of particular developments that, for the reasons outlined above, are being considered in areas of moderate or high flood risk. The test is comprised of two processes:

- **Plan Making Justification Test** – used at the plan preparation and adoption stage where it is intended to zone or otherwise designated land which is at moderate or high risk of flooding.
- **Development Management Justification Test** – used at the planning application state where it is intended to develop land at moderate or high risk of flooding for uses or development vulnerable to flooding that would generally be inappropriate for that land.

Table 2 is a matrix of receptor vulnerability versus Flood Zone to illustrate appropriate development and scenarios where development is required to meet the Justification Test.

Table 2: Vulnerability and Flood Zone Matrix for Justification Test

Development Vulnerability	Flood Zone A	Flood Zone B	Flood Zone C
Highly Vulnerable (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less Vulnerable	Justification Test	Appropriate	Appropriate
Water-compatible	Appropriate	Appropriate	Appropriate

Flood Risk Information

To ensure this SFRA for proposed variation no. 1 is based on the most up-to-date flood risk information, a comprehensive review of available flood data was undertaken and confirmed that no new relevant flood data has been published and / or made available since the CDP SFRA was published.

Therefore, the flood data / Flood Zones included in this SFRA report are considered the 'best' available to undertake the assessment.

Flood Risk Assessment

The following sections present the proposed variations overlain with Flood Zone mapping that has been developed for the CDP SFRA. The implication of the Flood Zoning on the nature of the variation (i.e. vulnerability classification) is assessed.

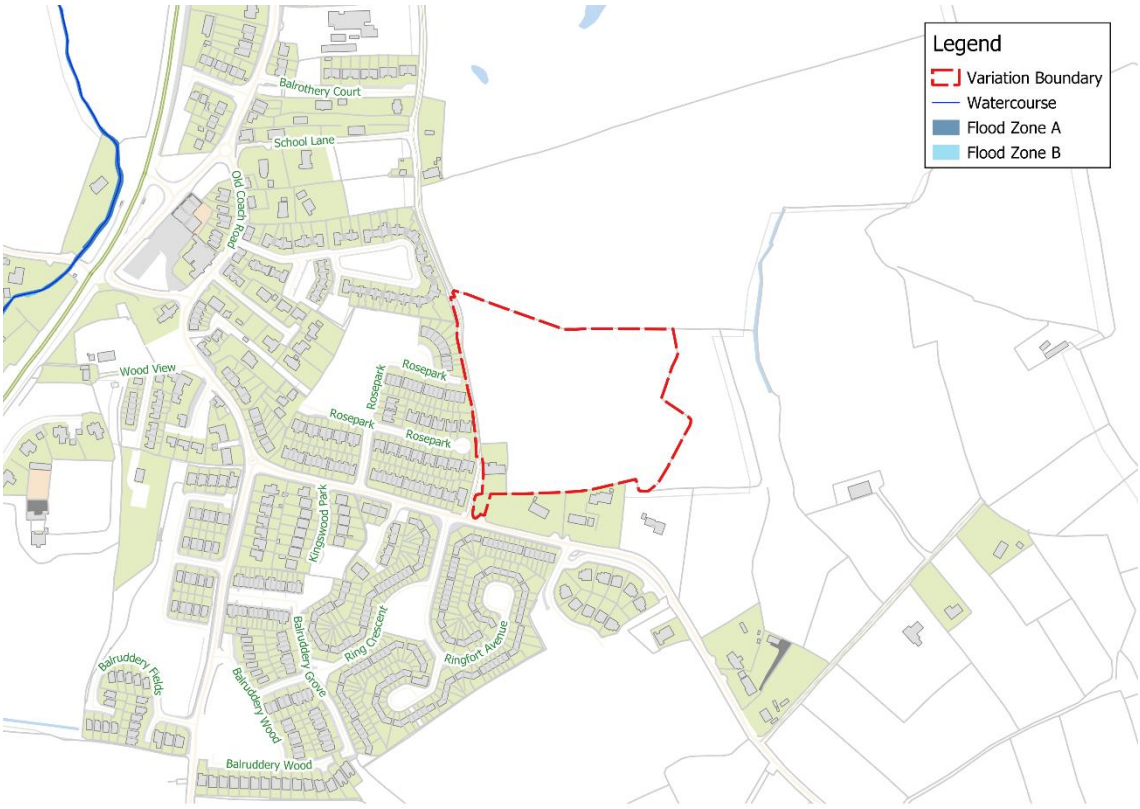
Site 4.1 on Sheet 4 – School Lane, Balrothery

Proposed Variation: Rezone from 'GB' Green Belt to 'RA' Residential Area and amend development boundary accordingly.

As shown on Figure 1, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 1: Site 4.1 overlain with Flood Zones



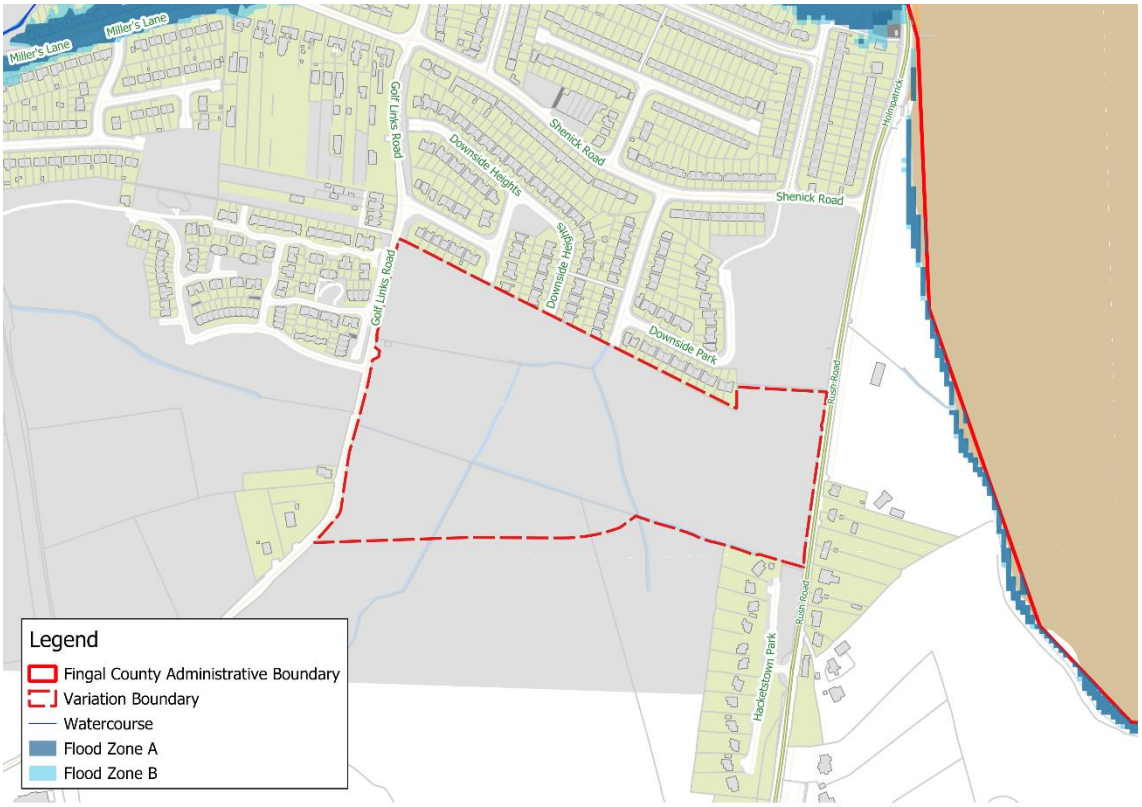
Site 5.1 on Sheet 5 – Holmpatrick, Skerries

Proposed Variation: rezone from 'GB' Green Belt and 'OS' Open Space to 'RA' Residential Area and amend development boundary accordingly.

As shown on Figure 1, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 2: Site 5.1 overlain with Flood Zones



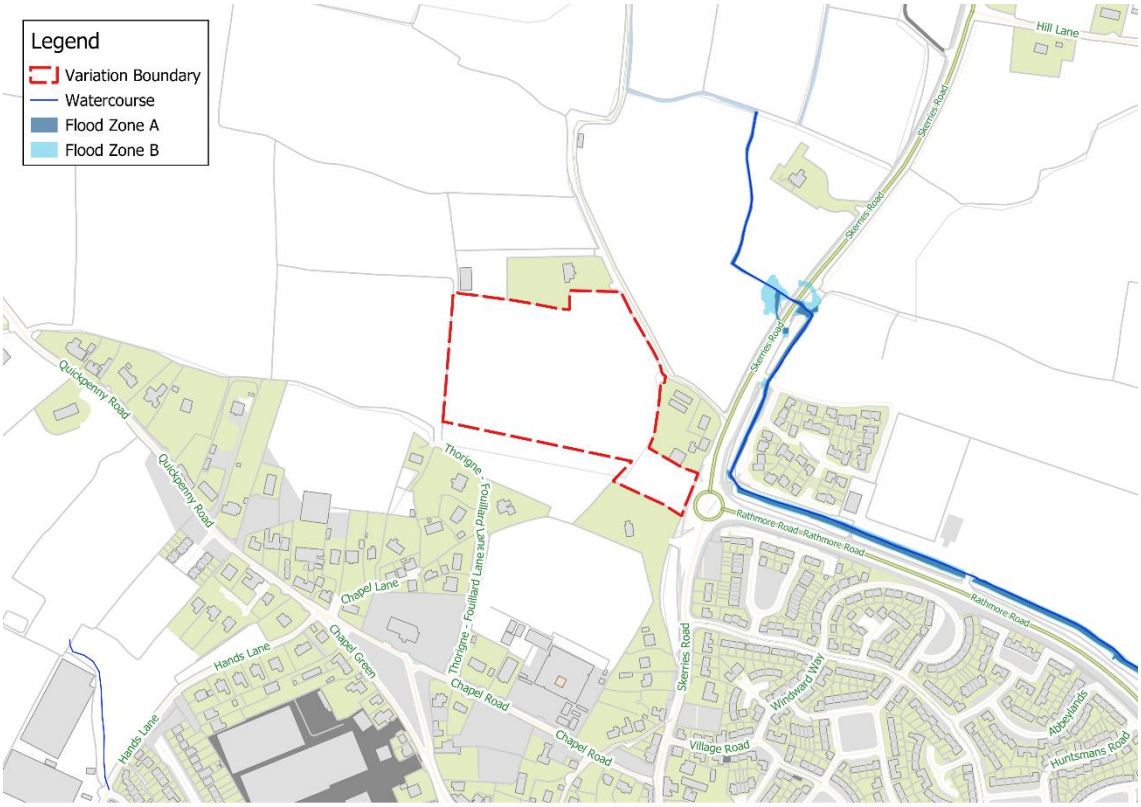
Site 6A.1 on Sheet 6A – Causetown, Lusk

Proposed Variation: rezone from 'OS' Open Space and 'RU' Rural to 'RA' Residential Area and amend development boundary accordingly.

As shown on Figure 3, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 3: Site 6A.1 overlain with Flood Zones



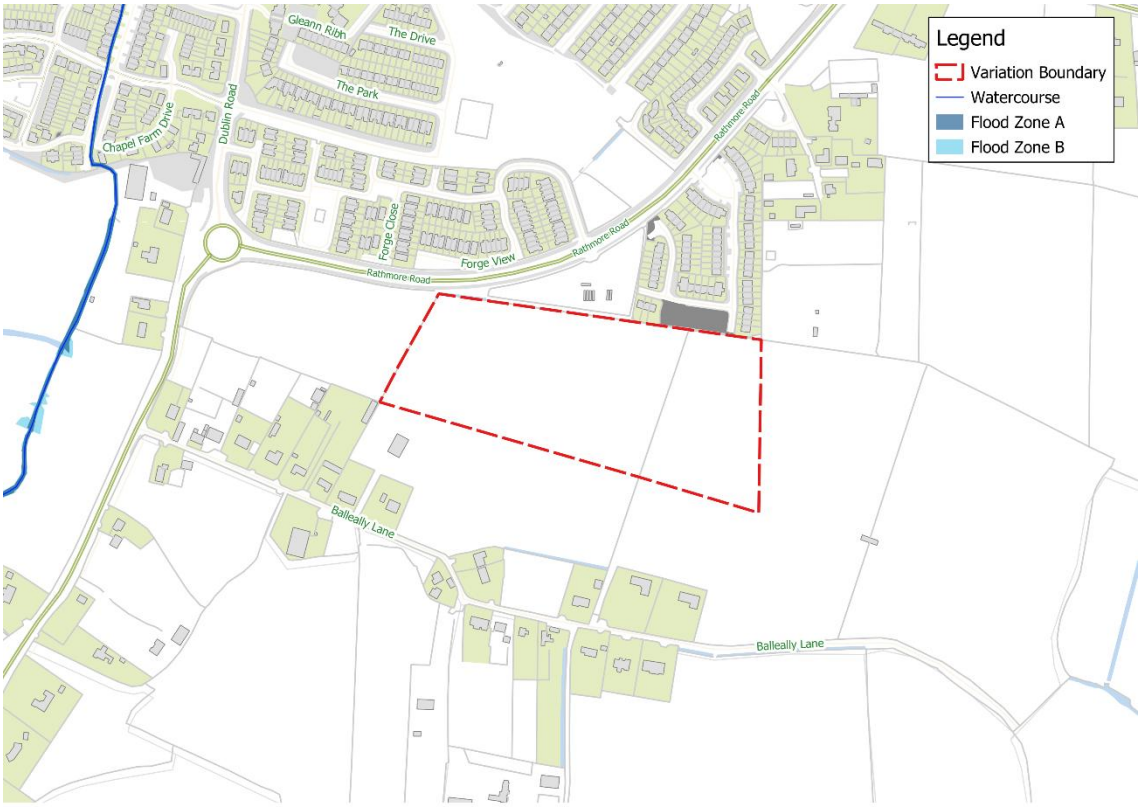
Site 6A.2 on Sheet 6A – Racecourse Road, Lusk

Proposed Variation: rezone from 'RU' Rural to 'RA' Residential Area and amend development boundary accordingly.

As shown on Figure 4, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 4: Site 6A.2 overlain with Flood Zones



Site 9.1 on Sheet 9 – Seamount, Malahide

Proposed Variation: rezone from 'RU' Rural To 'RA' Residential Area, inclusion of new Local Objective A and amend development boundary accordingly.

Local Objective A: Facilitate the provision of east/west and north/south linkages to ensure permeability within the area.

As shown on Figure 5, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 5: Site 9.1 overlain with Flood Zones

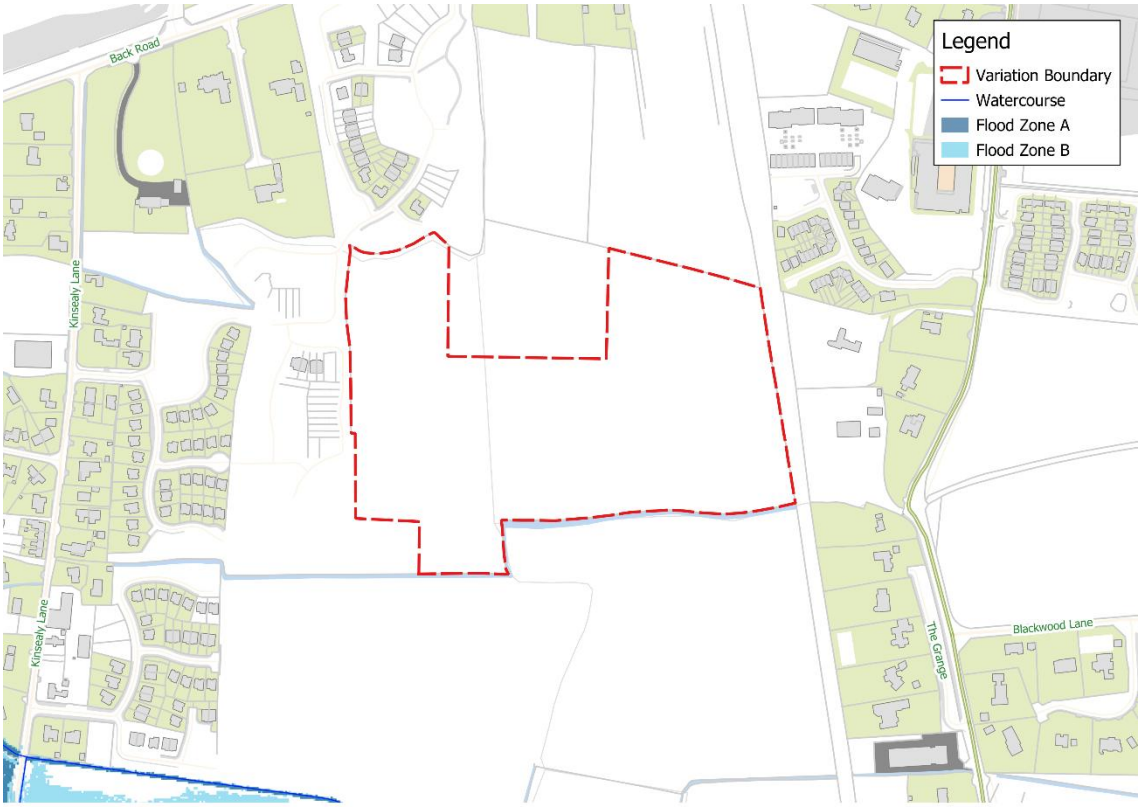
Site 9.2 on Sheet 9 – Broomfield West, Malahide

Proposed Variation: rezone from 'GB' Green Belt To 'RA' Residential Area and amend development boundary accordingly.

As shown on Figure 6, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 6: Site 9.2 overlain with Flood Zones



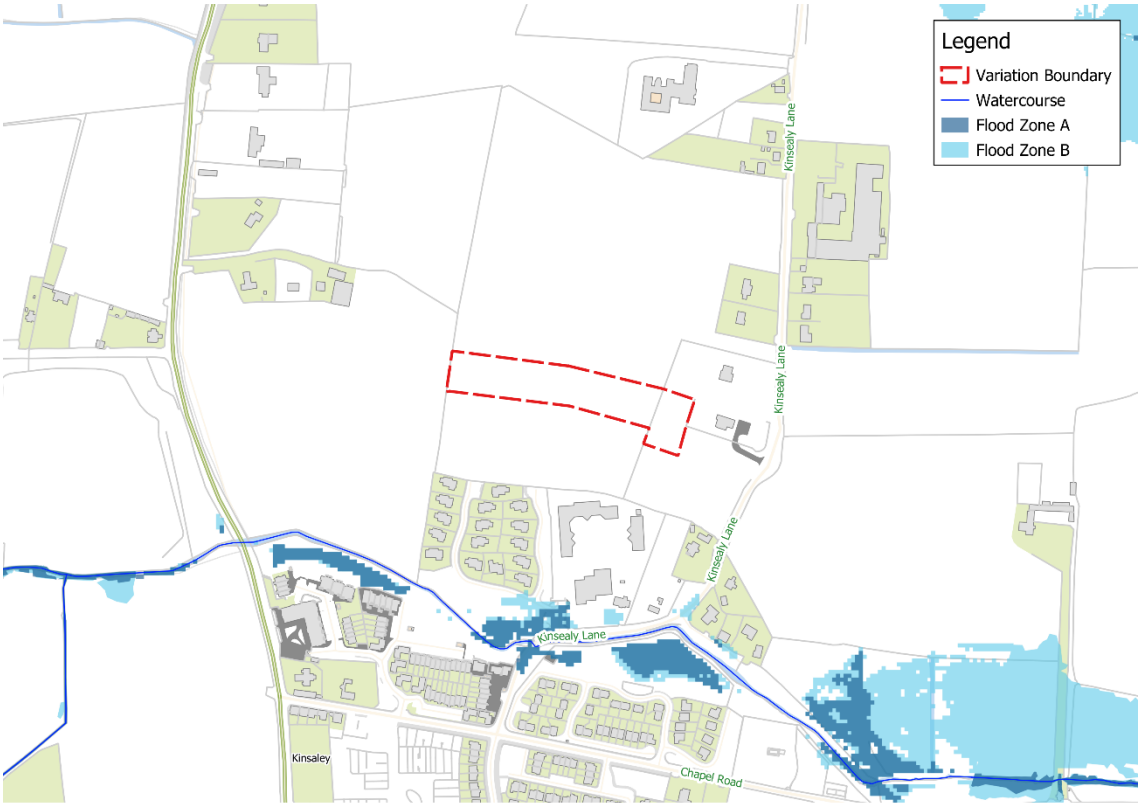
Site 9.3 on Sheet 9 – Greenwood, Kinsealy

Proposed Variation: rezone from 'GB' Green Belt To: 'RV' Rural Village and amend development boundary accordingly.

As shown on Figure 7, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RV' Rural Village may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 7: Site 9.3 overlain with Flood Zones



Site 9.4 on Sheet 9 – Kinsealy Lane, Kinsealy

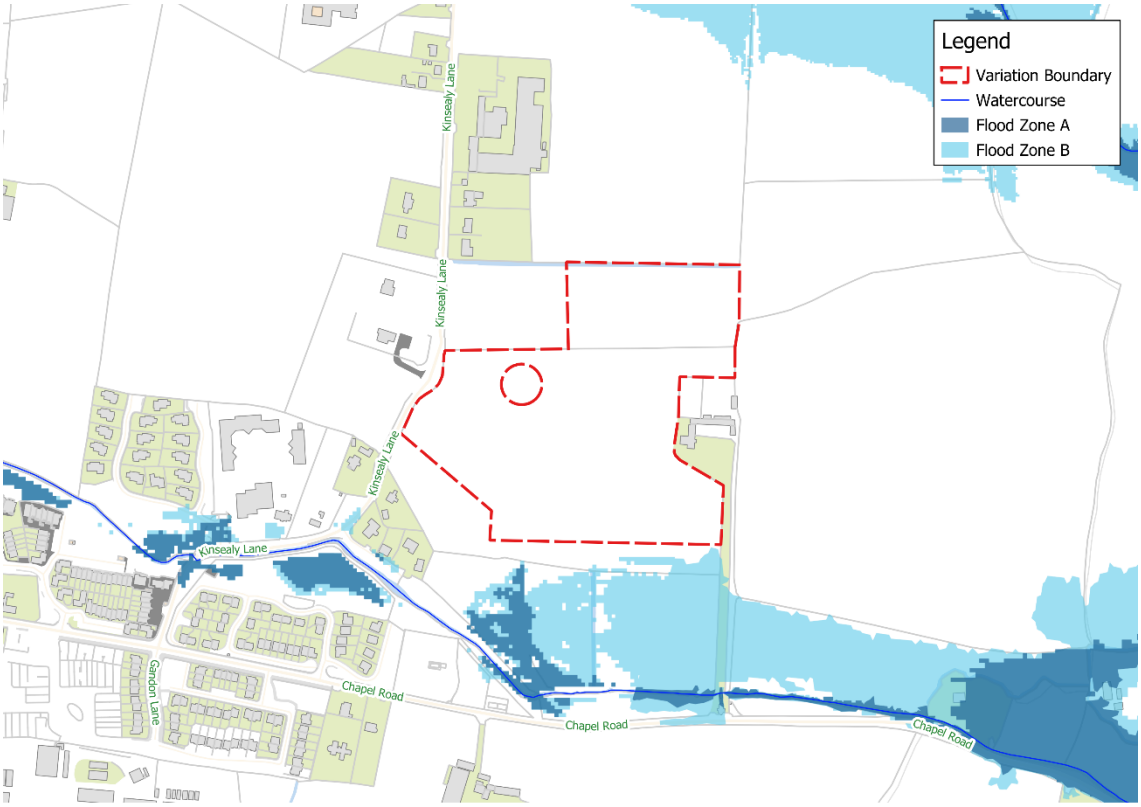
Proposed Variation: rezone from 'GB' Green Belt To: 'RV' Rural Village, inclusion of new Local Objective B and amend development boundary accordingly.

Local Objective B: Facilitate the provision of north/south linkages to ensure permeability within the area.

As shown on Figure 8, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RV' Rural Village may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 8: Site 9.4 overlain with Flood Zones



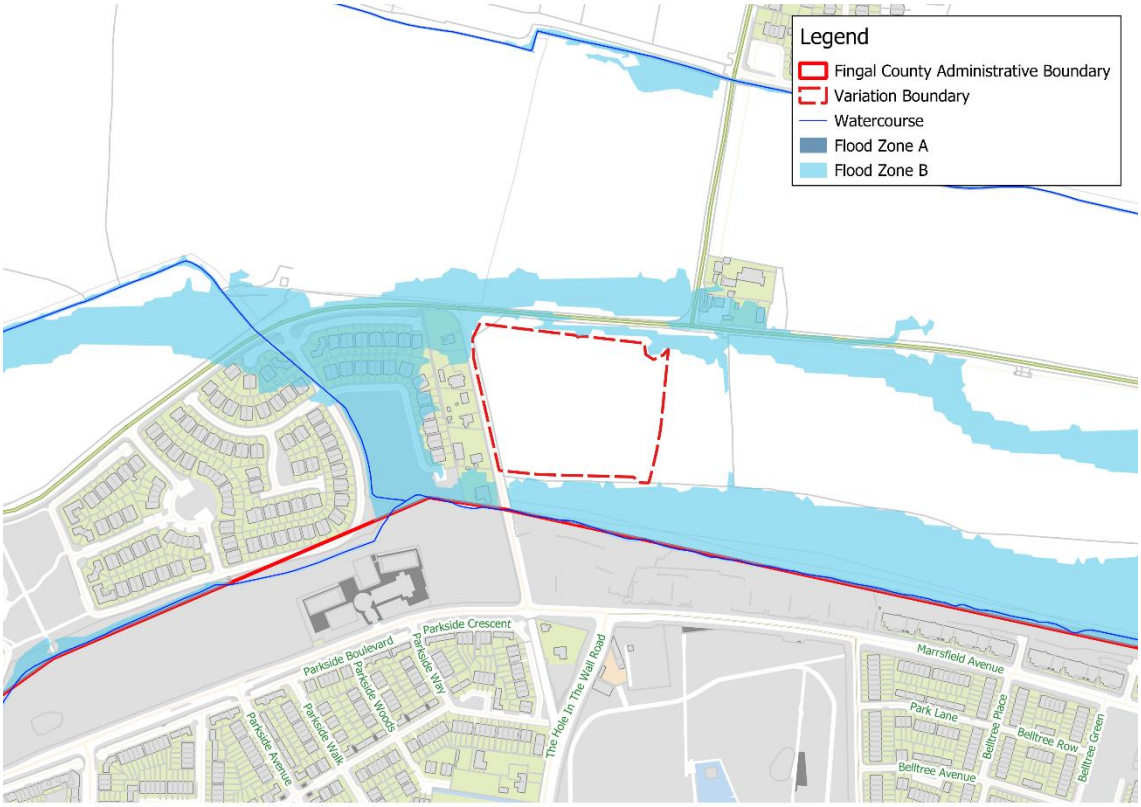
Site 9.5 on Sheet 9 – Hole in the Wall Road

Proposed Variation: rezone from 'GB' Green Belt To: 'RA' Residential Area and amend development boundary accordingly.

As shown on Figure 9, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 9: Site 9.5 overlain with Flood Zones



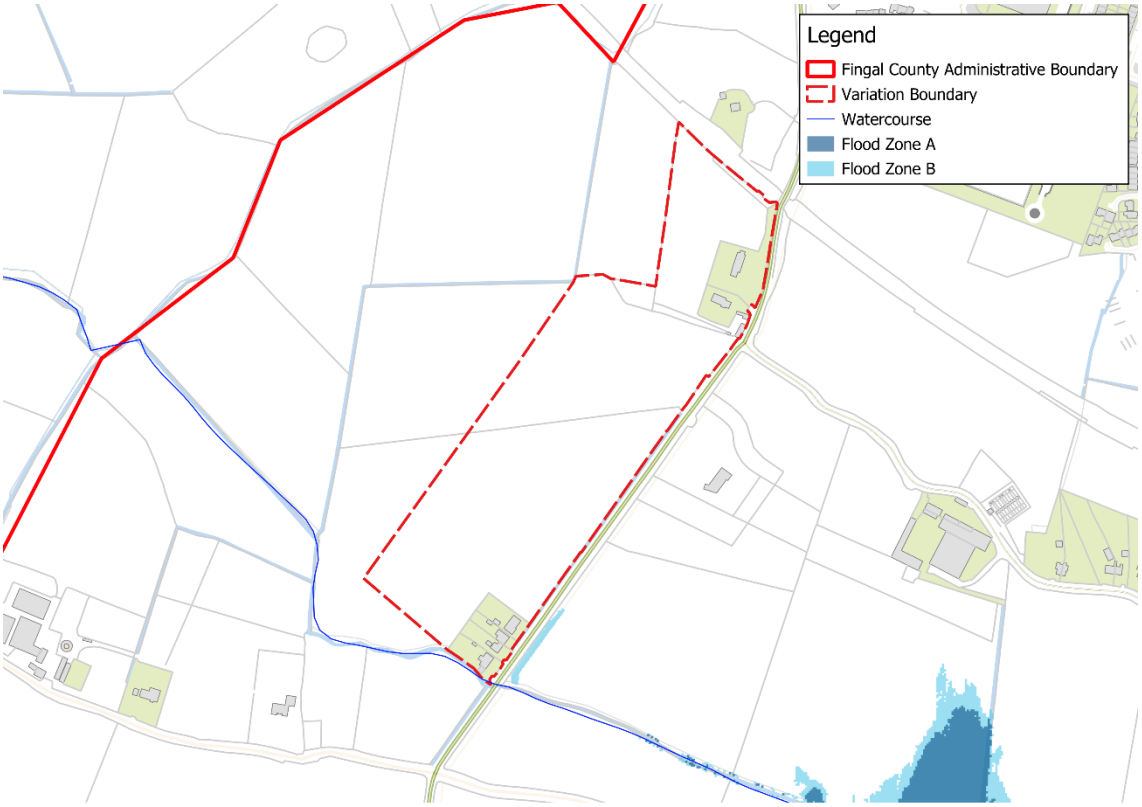
Site 13.1 on Sheet 13 – West of Barnhill, Dublin 15

Proposed Variation: rezone from 'GB' Green Belt To: 'RA' Residential Area and amend development boundary accordingly.

As shown on Figure 10, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 10: Site 13.1 overlain with Flood Zones



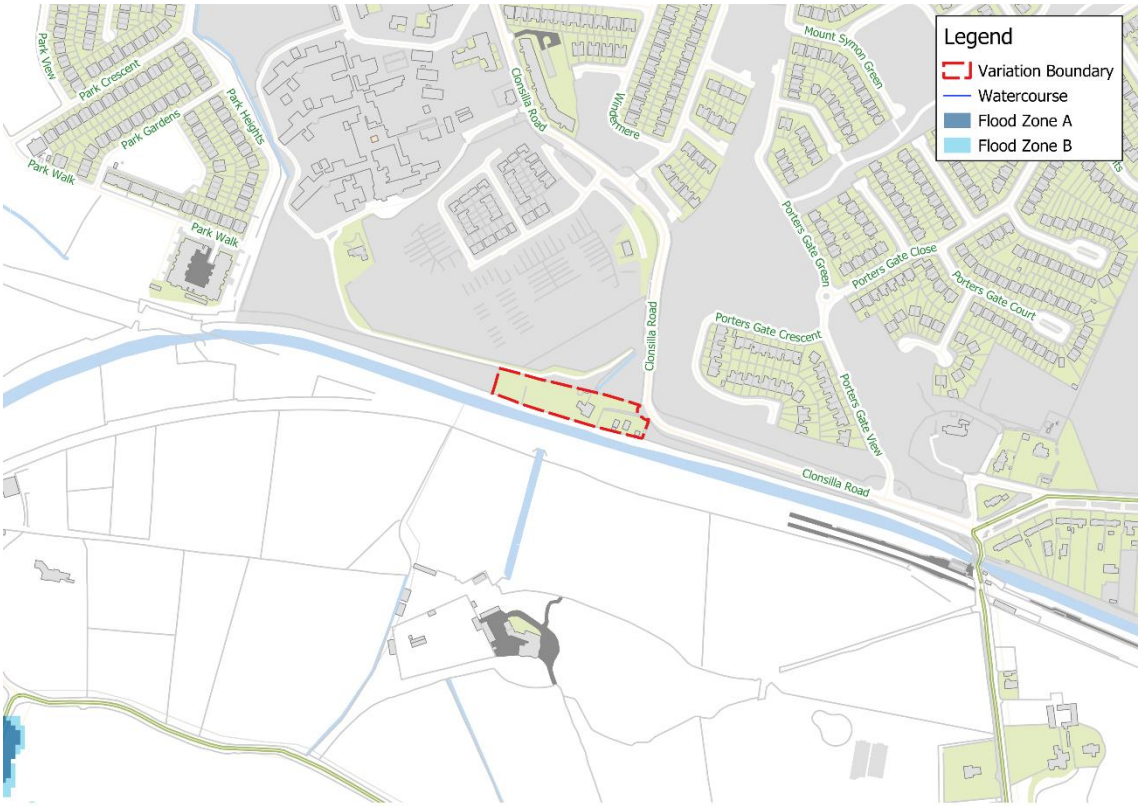
Site 13.2 on Sheet 13 – Clonsilla Road, Clonsilla

Proposed Variation: rezone from 'OS' Open Space To: 'RA' Residential Area and amend development boundary accordingly.

As shown on Figure 11, the zoning allocation is wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development of lands subject to the zoning objective 'RA' Residential Area may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 11: Site 13.2 overlain with Flood Zones



Site 13.3 on Sheet 13 – Strategic Land Reserve Designation

Proposed Variation: Replace Strategic Land Reserve Designation with Local Area Plan Objective for lands at Dunsink..

As shown on Figure 12, the zoning allocation covers a relatively large area and includes areas in Flood Zone A and Flood Zone B due to fluvial flooding from the River Tolka. However, as shown in Figure 13, the extent of floodplain is wholly contained within an area zoned for 'High Amenity' (light green) which is appropriate per the OPW Guidelines.

The remaining parts of the site are wholly located in Flood Zone C (i.e. outside Flood Zone A and Flood Zone B) and therefore appropriate for highly vulnerable, less vulnerable and water compatible development in line with the OPW Guidelines and CDP SFRA. A Plan Making Justification Test is not necessary.

Per the CDP SFRA, any development within the designated lands may still require a site-specific Flood Risk Assessment (SSFRA) as there may be sources of flooding not taken into account by Flood Zoning. Any future development will be required to comply with relevant surface water management guidance and satisfy the range of other proper planning and sustainable development considerations.

Figure 12: Site 13.3 overlain with Flood Zones

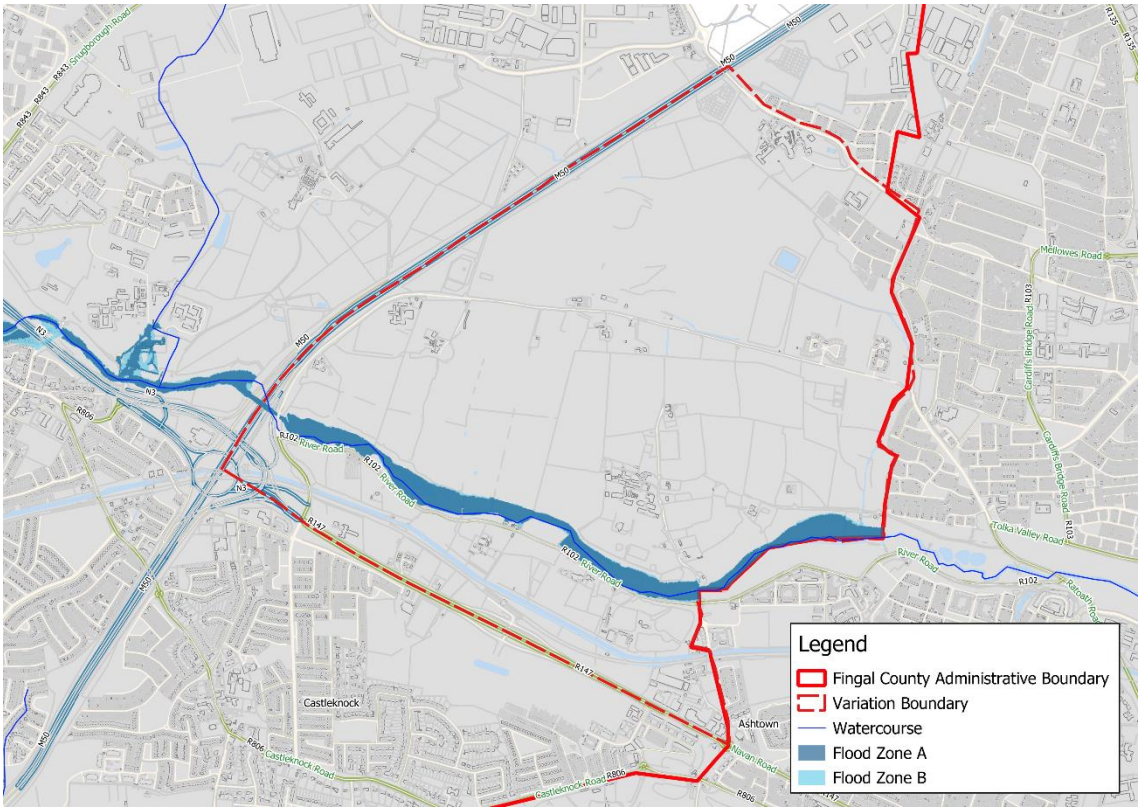


Figure 13: Site 13.3 Land Use Zonings overlain with Flood Zones

Conclusion

In summary, the proposed land use zonings for the sites included in the proposed variation are considered 'appropriate' as per the OPW Guidelines and do not require the application of a Plan-Making Justification Test.

The Sequential Approach and guidance outlined in the OPW Guidelines and Fingal CDP SFRA should be applied in any future development proposals relevant to the subject variation sites.