

**Appendix 4:**  
**SFRA Justification Test**

## **SDCC SFRA 2022-2028 Draft Justification Test Technical Note – 06/12/2021**

---

This technical note presents the draft justification tests for key locations in South Dublin County amended as per SDCC comments.

### **1. FLOOD RISK AREAS**

The SFRA to inform the development plan focused on a number of areas of specific interest in the County. The selection of these areas was informed by the development scenarios considered for the formulation of the Core Strategy, known flood risk areas incorporating the likely effects of climate change and the overlaying available flood risk mapping on the proposed 2022-2028 Development Plan zonings. These locations are listed below in terms of currently developed and undeveloped lands:

#### **1.1 Developed Lands**

##### **1.1.1 High Vulnerability Zonings**

###### **Clondalkin**

Sequential Approach to land Use zoning: Justification Test (See Section 2.1 below)  
Recommended Land Use Zoning Strategy: RES, VC & TC.

###### **Jobstown / Killinarden**

Sequential Approach to land Use zoning: Justification Test (See Section 2.1 below)  
Recommended Land Use Zoning Strategy: RU & RES.

###### **Rathfarnham**

Sequential Approach to land Use zoning: Justification Test (See Section 2.1 below)  
Recommended Land Use Zoning Strategy: RES.

###### **Kimmage / Templeogue**

Sequential Approach to land Use zoning: Justification Test (See Section 2.1 below)  
Recommended Land Use Zoning Strategy: RES.

###### **Lucan**

Sequential Approach to land Use zoning: Justification Test (See Section 2.1 below)  
Recommended Land Use Zoning Strategy: RES & VC.

###### **New Nangor Road & Naas Road**

Sequential Approach to land Use zoning: Justification Test (See Section 2.1 below)  
Recommended Land Use Zoning Strategy: REGEN.

##### **1.1.2 Less Vulnerable Zonings**

###### **Grange Castle / Greenogue /**

Sequential Approach to land Use zoning: Justification Test (See Section 2.2 below)  
Recommended Land Use Zoning Strategy: EE.

#### **Clondalkin**

Sequential Approach to land Use zoning: Justification Test (See Section 2.2 below)  
Recommended Land Use Zoning Strategy: EE.

#### **Lucan**

Sequential Approach to land Use zoning: Justification Test (See Section 2.2 below)  
Recommended Land Use Zoning Strategy: EE.

#### **New Nangor Road & Naas Road**

Sequential Approach to land Use zoning: Justification Test (See Section 2.2 below)  
Recommended Land Use Zoning Strategy: EE.

### **1.2 Undeveloped Lands at risk of flooding**

#### **Aungierstown and Ballybane Lands - Grange Castle**

Sequential Approach to land Use zoning: Justification Test (See Section 2.3.1 below)  
Recommended Land Use Zoning Strategy: EE

#### **Baldonnel (Undeveloped Lands)**

Sequential Approach to land Use zoning: Avoid  
Recommended Land Use Zoning Strategy: RU

#### **Ballycullen & Oldcourt**

Sequential Approach to land Use zoning: Justification Test (See Section 2.3.2 below)  
Recommended Land Use Zoning Strategy: RES-N on undeveloped lands

#### **Brittas**

Sequential Approach to land Use zoning: Avoid  
Recommended Land Use Zoning Strategy: Lands in vicinity of Brittas zoned for HA-DM

#### **Clonburris**

Sequential Approach to land Use zoning: Justification Test (See Section 2.3.3 below)  
Recommended Land Use Zoning Strategy: Clonburris SDZ

#### **Fortunestown**

Sequential Approach to land Use zoning: Justification Test (See Section 2.3.4 below )  
Recommended Land Use Zoning Strategy: RES-N

#### **Hazelhatch**

Sequential Approach to land Use zoning: Avoid  
Recommended Land Use Zoning Strategy: Lands in vicinity of Hazelhatch zoned for HA-DM

#### **Rathcoole & Saggart**

Sequential Approach to land Use zoning: Avoid  
Recommended Land Use Zoning Strategy: RU & OS

## 2. JUSTIFICATION TESTS

The areas requiring a Justification Test above can be divided into the following categories:

- Existing, developed, High Vulnerability Zonings
- Existing, developed, Less Vulnerable Zonings
- Undeveloped lands at risk of flooding

### 2.1 Existing, developed, High Vulnerability Zonings

**Justification Test for zoning objectives RES, TC, VC and DC areas in the County that are already developed and include existing vulnerable uses in Zone A and/or B**

- 1) ***The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.***

The National Planning Framework (NPF), supported by the National Development Plan (NDP), is the Government's high-level strategic plan for shaping the future growth and development of the Country, centred around ten National Strategic Outcomes (NSOS), which are underpinned by National Policy Objectives (NPOs). The Eastern and Midland Regional Spatial and Economic Strategy 2019-2031 (EMRSES) is a strategic plan to support implementation of the NPF and NDP, with the approach guided by sixteen Regional Policy Objectives (RPOs). The RSES policy framework for the region is split into three Functional Urban Areas (FUA), with South Dublin County located within the Dublin Metropolitan Areas, with a significant portion of the county also located within the settlement identified as Dublin City and Suburbs. The development within the DMA forms a central part of the policy within the RSES guided by the Dublin Metropolitan Area Strategic Plan (MASP), with two of the five strategic core areas located within South Dublin.

Lucan, Tallaght and Clondalkin all form part of the Dublin City and Suburbs and Dublin's Metropolitan Area Strategic Plan (MASP) in the Eastern and Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) 2019-2031.

- 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:***

All of these areas are developed areas that include suburban housing and are essential in order to support the continued viability of the urban centres in the County.

- ii) ***Comprises significant previously developed and/or under-utilised lands:***

The subject lands accommodate existing development and are therefore previously developed lands.

- iii) ***Is within or adjoining the core of an established or designated urban settlement:***

The subject developed lands are within the Metropolitan Area Strategic Plan.

- iv) ***Will be essential in achieving compact and sustainable urban growth:***

The subject lands accommodate existing development and are therefore previously developed lands. These lands are already essential in achieving and maintaining compact and sustainable urban growth. Vacant sites offer the potential to ensure compact growth within the existing urban area

- 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 accommodate existing development and are therefore previously developed lands. This criterion is set aside in accordance with the Circular PL 2/2014.

- 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.

A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The SFRA outlines how development can be adequately managed.

All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. An FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The FRA should consider the following:

- 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 consist of water compatible development only.
- Highly Vulnerable Development shall not be permitted in Flood Zone A or B. Traveller accommodation shall be considered highly vulnerable infrastructure as per the OPW Guidelines.
- FRAs should address surface water management for development, demonstrating consideration of GDSDS policies and incorporation of SuDS in accordance with SDCC SuDS Guidance policy.
- FRAs should consider the hydromorphological impacts on riparian corridors.
- Existing open spaces and water compatible uses in Flood Zones A and B should be retained to maintain flood storage areas.
- FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
- Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere.

## 2.2 Existing, developed, Less Vulnerable Zonings

### **Justification Test for zoning objectives EE areas in the County that are already developed and include existing less vulnerable uses in Zone A**

The Development Plan shall incorporate the requirement to consider such measures outlined in the SFRA and provide an objective to support and facilitate the delivery of flood alleviation schemes. There are a number of areas in the County identified on the Flood Zone maps accommodating existing industrial development, namely sections in proximity to the New Nangor Road, Naas Road and Greenogue Industrial Estate. It is noted that the areas are zoned EE and generally provides for less vulnerable uses. It is considered that it would be unrealistic to rezone these lands for water compatible uses as they are fully developed. The Justification Test in relation to these areas of existing developed zoned lands in the County is outlined below in the Table.

In applying the Justification Test Part 3, consideration has been given to structural and non-structural measures identified in the SFRA which may be required prior to further development taking place. The Development Plan shall include details of requirements for applicants in flood risk areas. In most locations, future opportunities for development are likely to be limited to extensions, replacement units, small commercial units, changes of uses or water compatible uses. As such, in most of these built-up areas, flood risk can be addressed through requiring a site-specific flood risk assessment which will identify appropriate mitigation measures such as retaining flow paths, flood resilient construction and emergency planning.

### **Justification Test**

- 1) ***The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.***

The National Planning Framework (NPF), supported by the National Development Plan (NDP), is the Government's high-level strategic plan for shaping the future growth and development of the Country, centred around ten National Strategic Outcomes (NSOS), which are underpinned by National Policy Objectives (NPOs). The Eastern and Midland Regional Spatial and Economic Strategy 2019-2031 (EMRSES) is a strategic plan to support implementation of the NPF and NDP, with the approach guided by sixteen Regional Policy Objectives (RPOs). The RSES policy framework for the region is split into three Functional Urban Areas (FUA), with South Dublin County located within the Dublin Metropolitan Areas, with a significant portion of the county also located within the settlement identified as Dublin City and Suburbs. The development within the DMA forms a central part of the policy within the RSES guided by the Dublin Metropolitan Area Strategic Plan (MASP), with two of the five strategic core areas located within South Dublin.

- 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:***

All of these areas are developed areas and are essential in order to support the continued economic viability of the Dublin Metropolitan Area.
  - ii) ***Comprises significant previously developed and/or under-utilised lands:***

The subject lands accommodate existing development and are therefore previously developed lands.
  - iii) ***Is within or adjoining the core of an established or designated urban settlement:***

The subject developed lands are within the Metropolitan Area Strategic Plan (MASP).

**iv) Will be essential in achieving compact and sustainable urban growth:**

The subject lands accommodate existing development.

**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 accommodate existing development and are therefore previously developed lands. This criterion is set aside in accordance with the Circular PL 2/2014.

**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.

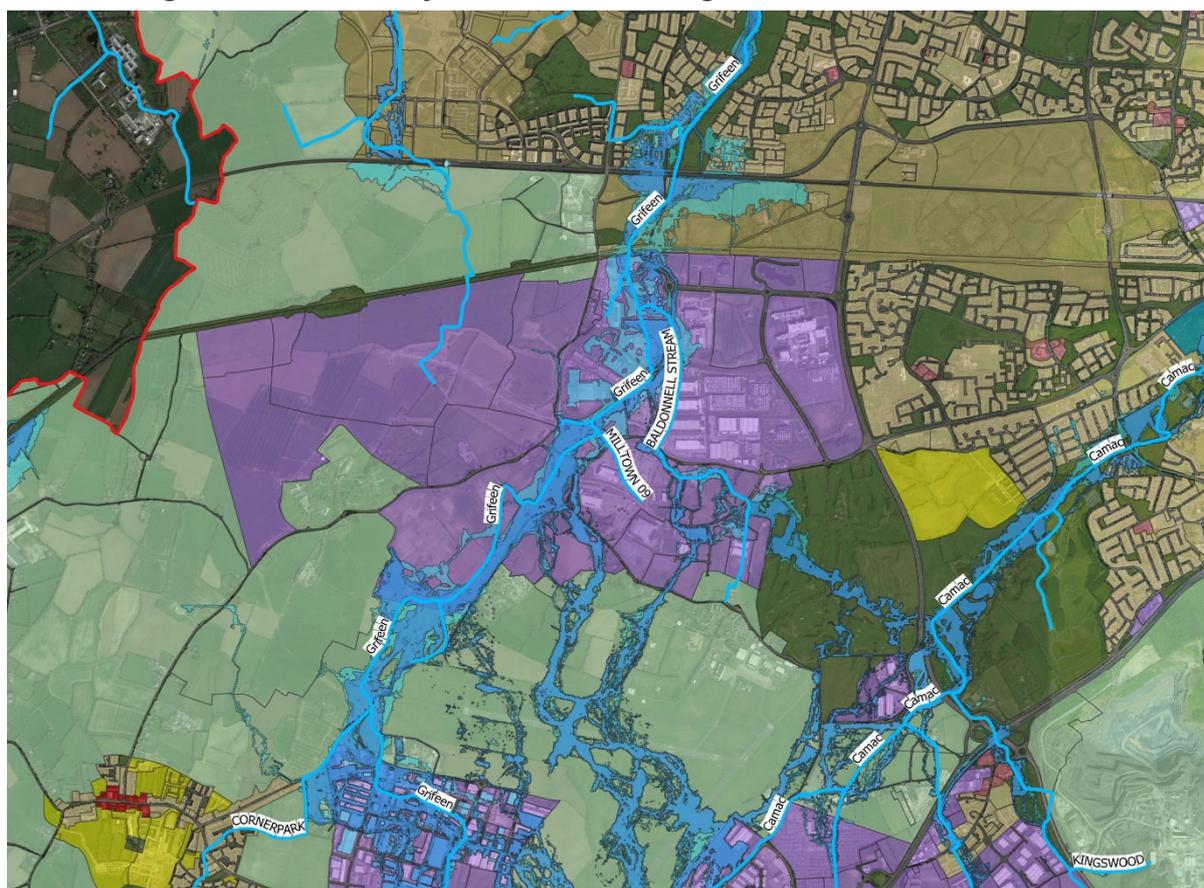
A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The SFRA outlines how development can be adequately managed. The main points include:

All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. An FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The FRA should consider the following:

- 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 consist of water compatible development only.
- Highly Vulnerable Development shall not be permitted in Flood Zone A or B. Traveller accommodation shall be considered highly vulnerable infrastructure as per the OPW Guidelines.
- FRAs should address surface water management for development, demonstrating consideration of GSDS policies and incorporation of SuDS in accordance with SDCC SuDS Guidance policy.
- FRAs should consider the hydromorphological impacts on riparian corridors.
- Existing open spaces and water compatible uses in Flood Zones A and B should be retained to maintain flood storage areas.
- FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
- Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere.

## 2.3 Undeveloped lands at risk of flooding

### 2.3.1 Aungierstown and Ballybane Lands - Grange Castle



**Figure 1** Aungierstown and Ballybane Lands - Grange Castle flood extents over laid on zoning maps

Flooding emanating from the Griffeen and its tributaries affects areas between Peamount Road and Nangor Road/Grange Castle Road (Casement Aerodrome area) and areas north and west of Microsoft Ireland Data Centres (between railway line and Nangor Road). Flooding emanating from the Camac affects areas north-west of Naas Road, in Corkagh Park and Fonthill Road South. Areas affected are currently zoned as “OS – To preserve and provide for open space and recreational amenities”, “RES – To protect and/or improve residential amenity”, “EE – To provide for enterprise and employment related uses”, and “RU To protect and improve rural amenity and to provide for the development of agriculture”.

- 1) The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.**

The National Planning Framework (NPF), supported by the National Development Plan (NDP), is the Government’s high-level strategic plan for shaping the future growth and development of the Country, centred around ten National Strategic Outcomes (NSOs), which are underpinned by National Policy Objectives (NPOs). The Eastern and Midland Regional Spatial and Economic Strategy 2019-2031 (EMRSES) is a strategic plan to support implementation of the NPF and NDP, with the approach guided by sixteen Regional Policy Objectives (RPOs). The RSES policy framework for the region is split into three Functional Urban Areas (FUA), with South Dublin County located within the Dublin Metropolitan Areas, with a significant portion of the county also located within the settlement identified as Dublin City and Suburbs. The development within the DMA forms a central part of the policy within the RSES guided by the Dublin Metropolitan Area Strategic Plan (MASP), with two of the five strategic core areas located within South

Dublin. Grange Castle is a key strategic employment location within the Dublin City and Suburbs and the Dublin Metropolitan Area Strategic Plan (MASP) in the EMRA RSES.

**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:**

It is considered that the lands at Grange Castle are essential in unlocking the potential of Strategic Employment Development Areas in the Dublin Metropolitan Area as stated within the EMRA RSES.

**ii) Comprises significant previously developed and/or under-utilised lands:**

The subject lands consist of underutilised land suitable for business park development, proximate to existing services and within the Dublin Metropolitan Area.

**iii) Is within or adjoining the core of an established or designated urban settlement:**

The subject lands are within the Dublin City and Suburbs and MASP areas for the Eastern and Midlands region.

**iv) Will be essential in achieving compact and sustainable urban growth:**

The subject lands are essential in the economic growth of Clondalkin and the wider County and achieving sustainable urban growth.

**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 more suitable strategic lands identified within the County.

**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.**

A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process.

All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. An FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The FRA should consider the following:

- 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 consist of water compatible development only.
- Highly Vulnerable Development shall not be permitted in Flood Zone A or B. Traveller accommodation shall be considered highly vulnerable infrastructure as per the OPW Guidelines.
- FRAs should address surface water management for development, demonstrating consideration of GSDS policies and incorporation of SuDS in accordance with SDCC SuDS Guidance policy.
- FRAs should consider the hydromorphological impacts on riparian corridors.
- Existing open spaces and water compatible uses in Flood Zones A and B should be retained to maintain flood storage areas.

- FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
- Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere.

### 2.3.2 Ballycullen - Oldcourt



**Figure 2 Ballycullen Oldcourt - Flooding extents over laid on zoning maps**

Flooding is indicated from the Dodder and its tributaries (such as the Orlagh, Ballycullen Stream and Jobstown Stream) affects areas south of Tallaght Bypass, west of Balliharcorney Road / Firhouse Road, and areas south and north of Killiney Road (west of Southern Cross Route). Flooding from the Owenadoher and its tributaries is indicated in areas along Cruagh Road (south of Southern Cross Route) and around junction Edmondstown Road / Ballyboden Way / Taylors Lane. Affected areas are currently zones as “RES – To protect and/or improve residential amenity”, “OS – To preserve and provide for open space and recreational amenities”, “HA-DM - To protect and enhance the outstanding natural character and amenity of the Liffey Valley, Dodder Valley and Dublin Mountains areas”, “RU – To protect and improve rural amenity and to provide for the development of agriculture” and “RES-N – To provide for new residential communities in accordance with approved area plans”.

- 1) The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.**

The National Planning Framework (NPF), supported by the National Development Plan (NDP), is the Government’s high-level strategic plan for shaping the future growth and development of the Country, centred around ten National Strategic Outcomes (NSOs), which are underpinned by National Policy Objectives (NPOs). The Eastern and Midland Regional Spatial and Economic Strategy 2019-2031 (EMRSES) is a strategic plan to support implementation of the NPF and NDP, with the approach guided by sixteen Regional Policy Objectives (RPOs). The RSES policy framework for the region is split into three Functional Urban Areas (FUA), with South Dublin County located within the Dublin Metropolitan Areas, with a significant portion of the county also located within the settlement identified as Dublin City and Suburbs. The development within the DMA forms

a central part of the policy within the RSES guided by the Dublin Metropolitan Area Strategic Plan (MASP), with two of the five strategic core areas located within South Dublin.

**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:**

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 set out by the EMRA RSES.

**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.

**iii) Is within or adjoining the core of an established or designated urban settlement:**

The lands at Ballycullen-Oldcourt fall within the Dublin City and Suburbs and MASP area in the EMRA RSES.

**iv) Will be essential in achieving compact and sustainable urban growth:**

The future development of these lands will be in accordance with the approved Ballycullen – Oldcourt 2014 LAP (as extended to 2024) prepared in accordance with Ministerial guidance documents. The implementation of the LAP is essential in achieving compact and sustainable urban growth.

**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) 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.

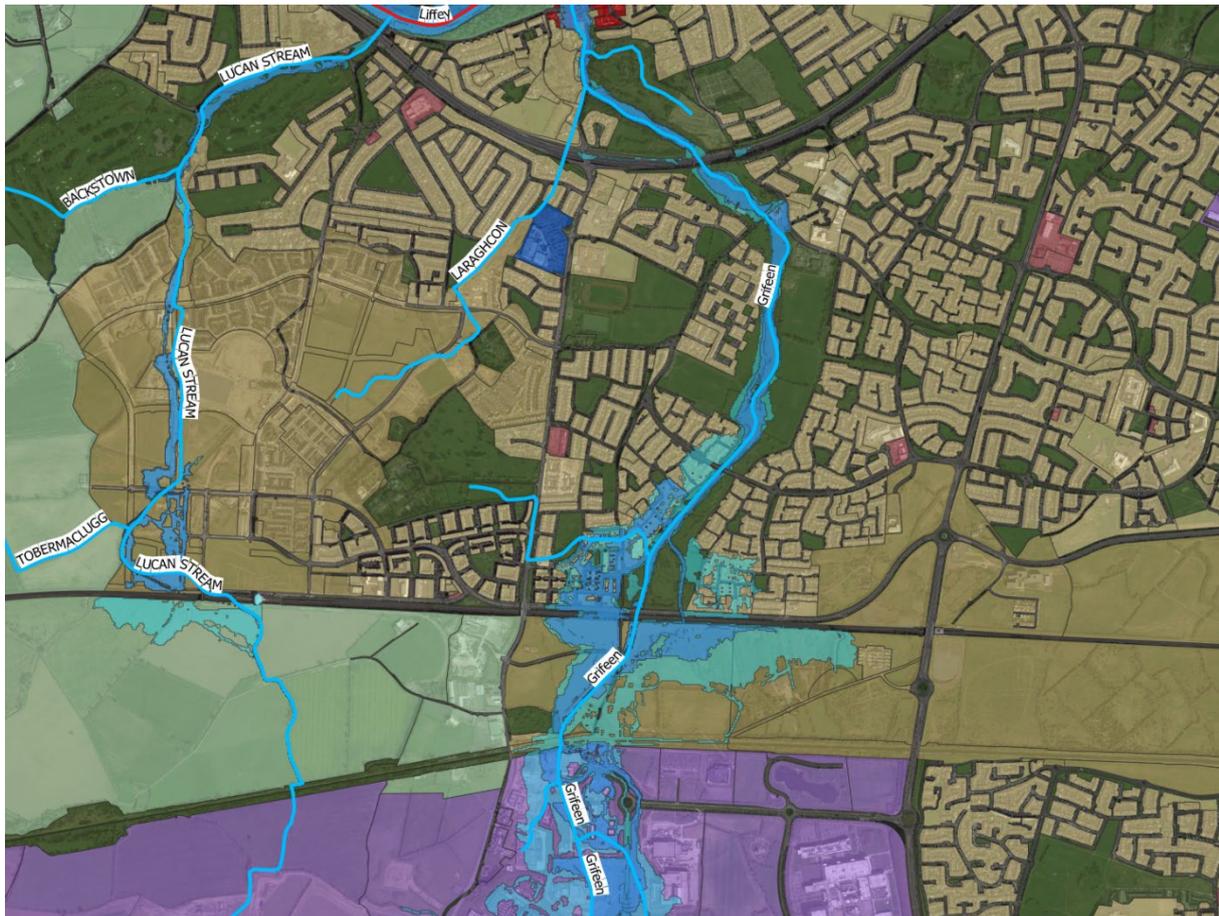
A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process.

The RES-N lands within flood risk zones are undeveloped. The Ballycullen - Oldcourt Local Area Plan 2014 (as extended to 2024) 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.

All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. An FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The FRA should consider the following:

- 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 consist of water compatible development only.
- Highly Vulnerable Development shall not be permitted in Flood Zone A or B. Traveller accommodation shall be considered highly vulnerable infrastructure as per the OPW Guidelines.
- FRAs should address surface water management for development, demonstrating consideration of GSDSDS policies and incorporation of SuDS in accordance with SDCC SuDS Guidance policy.
- FRAs should consider the hydromorphological impacts on riparian corridors.
- Existing open spaces and water compatible uses in Flood Zones A and B should be retained to maintain flood storage areas.
- FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
- Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere.

### 2.3.3 Clonburriss SDZ



**Figure 3 Clonburriss flood extents over laid on zoning maps**

Flooding from the Griffeen is indicated south of the rail line (between the R120 Newcastle-Lucan Road and the R136 Grange Castle Road), north of the rail line (Griffeen Valley Park) and north of Lucan Bypass. Areas affected are currently zones as “OS – To preserve and provide for open space and recreational amenities”, “SDZ - To provide for strategic development in accordance with approved planning schemes” and “EE - To provide for enterprise and employment related uses”.

- 2) The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.***

The National Planning Framework (NPF), supported by the National Development Plan (NDP), is the Government’s high-level strategic plan for shaping the future growth and development of the Country, centred around ten National Strategic Outcomes (NSOS), which are underpinned by National Policy Objectives (NPOs). The Eastern and Midland Regional Spatial and Economic Strategy 2019-2031 (EMRSES) is a strategic plan to support implementation of the NPF and NDP, with the approach guided by sixteen Regional Policy Objectives (RPOs). The RSES policy framework for the region is split into three Functional Urban Areas (FUA), with South Dublin County located within the Dublin Metropolitan Areas, with a significant portion of the county also located within the settlement identified as Dublin City and Suburbs. The development within the DMA forms a central part of the policy within the RSES guided by the Dublin Metropolitan Area Strategic Plan (MASP), with two of the five strategic core areas located within South Dublin.

Clonburris forms part of Dublin City and Suburbs within the Settlement Hierarchy of the EMRA Regional Spatial and Economic Strategy.

**3) 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:**

It is considered that development of Clonburris is essential to allow for growth and expansion of South Dublin in order to meet the targets as set out in the EMRA RSES.

**ii) Comprises significant previously developed and/or under- utilised lands:**

The Clonburris SDZ comprises undeveloped lands suitable for a residential and mixed-use type development, proximate to the existing services.

**iii) Is within or adjoining the core of an established or designated urban settlement:**

Clonburris forms part of Dublin City and Suburbs within the Settlement Hierarchy of the EMRA Regional Spatial and Economic Strategy.

**iv) Will be essential in achieving compact and sustainable urban growth:**

The future development of these lands is essential in achieving compact and sustainable urban growth.

**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 with equivalent proximity to developing areas, infrastructure and services.

**4) 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.

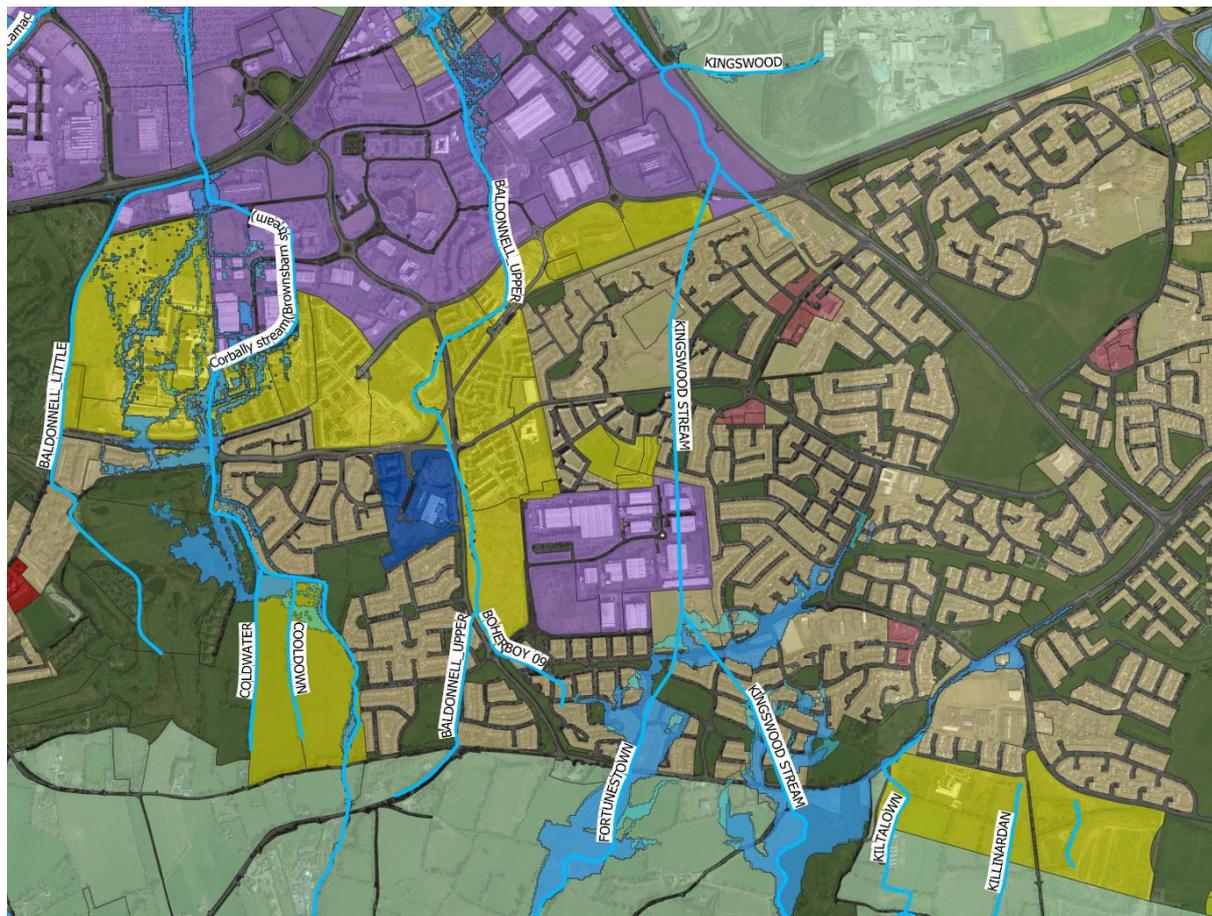
The SDZ lands has been subject to a Strategic Flood Risk Assessment (FRA) including the application of the sequential approach in the land use strategy of the approved plan and appropriate flood risk assessment at planning application stage. There is no overlap between zoned undeveloped lands that are subject to vulnerable uses and Flood Zone A or B in the current climate scenario.

All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. An FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The FRA should consider the following:

- 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 consist of water compatible development only.
- Highly Vulnerable Development shall not be permitted in Flood Zone A or B. Traveller accommodation shall be considered highly vulnerable infrastructure as per the OPW Guidelines.

- FRAs should address surface water management for development, demonstrating consideration of GDSDS policies and incorporation of SuDS in accordance with SDCC SuDS Guidance policy.
- FRAs should consider the hydromorphological impacts on riparian corridors.
- Existing open spaces and water compatible uses in Flood Zones A and B should be retained to maintain flood storage areas.
- FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
- Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere.

### 2.3.4 Fortunestown



**Figure 4** Fortunestown Flood extents over laid on zoning maps

The subject lands are zoned 'RES-N' in the 2022 – 2028 Development Plan and as such, are generally categorised as undeveloped, zoned lands at risk of flooding. Fortunestown is an area within the identified Moderate Sustainable Growth Town of Saggart/ Citywest. Objective RES-N 'to provide for new residential communities in accordance with approved area plans' is applied to 108 ha of land in the area. To determine the appropriateness of the zoning at Fortunestown, the sequential approach has been applied, which has culminated in application of the Justification Test.

- 1) The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.**

The National Planning Framework (NPF), supported by the National Development Plan (NDP), is the Government's high-level strategic plan for shaping the future growth and development of the Country, centred around ten National Strategic Outcomes (NSOS), which are underpinned by National Policy Objectives (NPOs). The Eastern and Midland Regional Spatial and Economic Strategy 2019-2031 (EMRSES) is a strategic plan to support implementation of the NPF and NDP, with the approach guided by sixteen Regional Policy Objectives (RPOs). The RSES policy framework for the region is split into three Functional Urban Areas (FUA), with South Dublin County located within the Dublin Metropolitan Areas, with a significant portion of the county also located within the settlement identified as Dublin City and Suburbs. The development within the DMA forms a central part of the policy within the RSES guided by the Dublin Metropolitan Area Strategic Plan (MASP), with two of the five strategic core areas located within South Dublin.

**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:**

It is considered that the lands at Saggart/ Citywest (Fortunestown LAP 2012 extended to 2022) are essential to allow for growth and expansion of South Dublin in order to meet the targets as set out in the EMRA RSES.

**ii) Comprises significant previously developed and/or under-utilised lands:**

The subject lands consist of significant underutilised land suitable for a higher density type development, in close proximity to the Luas.

**iii) Is within or adjoining the core of an established or designated urban settlement:**

The lands at Saggart/ Citywest fall within the Metropolitan Area Strategic Plan.

**iv) Will be essential in achieving compact and sustainable urban growth:**

The future development of these lands will be in accordance with the approved Fortunestown LAP 2012 (as extended to 2022) prepared in accordance with Ministerial guidance documents.

**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 is no alternative unzoned site available for significant development such as that envisaged at Saggart / Citywest with equivalent established infrastructure and services: There are no alternative unzoned site available for significant development such as that envisaged at Fortunestown with equivalent established infrastructure and services.

**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.

A SFRA has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process. The SFRA mapping identifies Flood Zone A and B on a portion of the overall RES-N lands within the Fortunestown LAP boundary.

The lands within Flood Zone A are undeveloped. The Fortunestown Local Area Plan 2012 (as extended to 2022) was prepared having regard to the best available flood data at the time and consideration of the strategy in the LAP. Although residential uses have been identified for the overall area, the LAP identified flood risk areas and the overall strategy was prepared having regard to the sequential approach within the plan boundary, focusing the residential housing in Flood Zone C and directing open space, roads and gardens in Flood Zones A and B. Objective GI7 of the LAP states that all planning applications for residential and/or commercial floorspace on sites in areas at risk of flooding shall be accompanied by a Flood Risk Assessment that is 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 shall depend on the type and scale of development and the sensitivity of the area.

All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. An FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The FRA should consider the following:

- 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 consist of water compatible development only.
- Highly Vulnerable Development shall not be permitted in Flood Zone A or B. Traveller accommodation shall be considered highly vulnerable infrastructure as per the OPW Guidelines.
- FRAs should address surface water management for development, demonstrating consideration of GSDS policies and incorporation of SuDS in accordance with SDCC SuDS Guidance policy.
- FRAs should consider the hydromorphological impacts on riparian corridors.
- Existing open spaces and water compatible uses in Flood Zones A and B should be retained to maintain flood storage areas.
- FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
- Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere.