

**Strategic Flood Risk Assessment**

**for**

**Proposed Variation**

**(No. 4)**

**of the**

**Dublin City Development Plan  
2022-2028**

## 1.0 Introduction

Dublin City Council has commenced the preparation of proposed variation no. 4 to change the zoning of a site at 80 Philipsburgh Avenue, Dublin 3 from Z9 (Amenity/Open Space Lands/Green Network) to Z1 (Sustainable Residential Neighbourhoods). The area of the variation rezoning site is approximately 0.052 ha and is delineated in red, identified in Figure 1 below.

The OPW is the lead agency for flood risk management in Ireland, part of the Department of Finance. The coordination and implementation of Government policy on the management of flood risk in Ireland is part of its responsibility. The European Communities (Assessment and Management of Flood Risks) Regulations 2010 (S.I. No. 122) identifies the Commissioners of Public Works as the 'competent authority' with overall responsibility for implementation of the Floods Directive 2007/60/EC.

The CFRAM (Catchment Flood Risk Assessment and Management) Programme has been completed and implementation of the outputs from this work is underway. The EU Floods Directive requires Member States to review the PFRA (Preliminary Flood Risk Assessment), the FRMPs (Flood Risk Management Plans) and the flood maps on a six-yearly cycle. As part of the OPW's commitment to carry out these reviews, the NIFM (National Indicative Fluvial Maps) Programme was completed in 2019. The OPW continues to update predictive flood mapping to provide the best available flood risk information through the map review programme, where the criteria to trigger a review have been met.

As a variation to the Dublin City Development Plan 2022 – 2028, the preparation of the proposed variation no.4 documentation, apart from the principal variation report, includes a Strategic Environmental Assessment (SEA) Screening, an Appropriate Assessment (AA) Screening and this document, which represents the Strategic Flood Risk Assessment (SFRA) statement of the variation site.

The SFRA, prepared as part of the Dublin City Development Plan (CDP) 2022 – 2028 and which informed the preparation of the CDP, had regard to the DEHLG Guidelines for Planning Authorities (DEHLG & OPW, 2009) on '*The Planning System and Flood Risk Management*' as amended by Circular PI2/2014 together with Technical Appendices. These Guidelines (the 2009 Guidelines) were issued under Section 28 of the Planning and Development Act 2000 as amended, and require Planning Authorities to introduce flood risk assessment as an integral and leading element of Spatial Planning. This requirement is also sought for variations to any development plan, hence the preparation of this accompanying document to the proposed variation report.

The Strategic Flood Risk Assessment (SFRA) for the administrative area of Dublin City Council is captured under Volume 7 to the City Development Plan (CDP) 2022 - 2028, with Chapter 9 (Sustainable Environmental Infrastructure and Flood Risk) of Volume 1, the Written Statement, of the CDP citing policies and objectives relating to Flood Management. This relevant documentation can be viewed here at:

<https://www.dublincity.ie/residential/planning/strategic-planning/dublin-city-development-plan/development-plan-2022-2028>

Any planning application arising from this proposed variation no. 4 will be required to comply with the flood risk management and surface water management provisions of the Dublin City Development Plan 2022 – 2028.

### **1.1 The Proposed Variation**

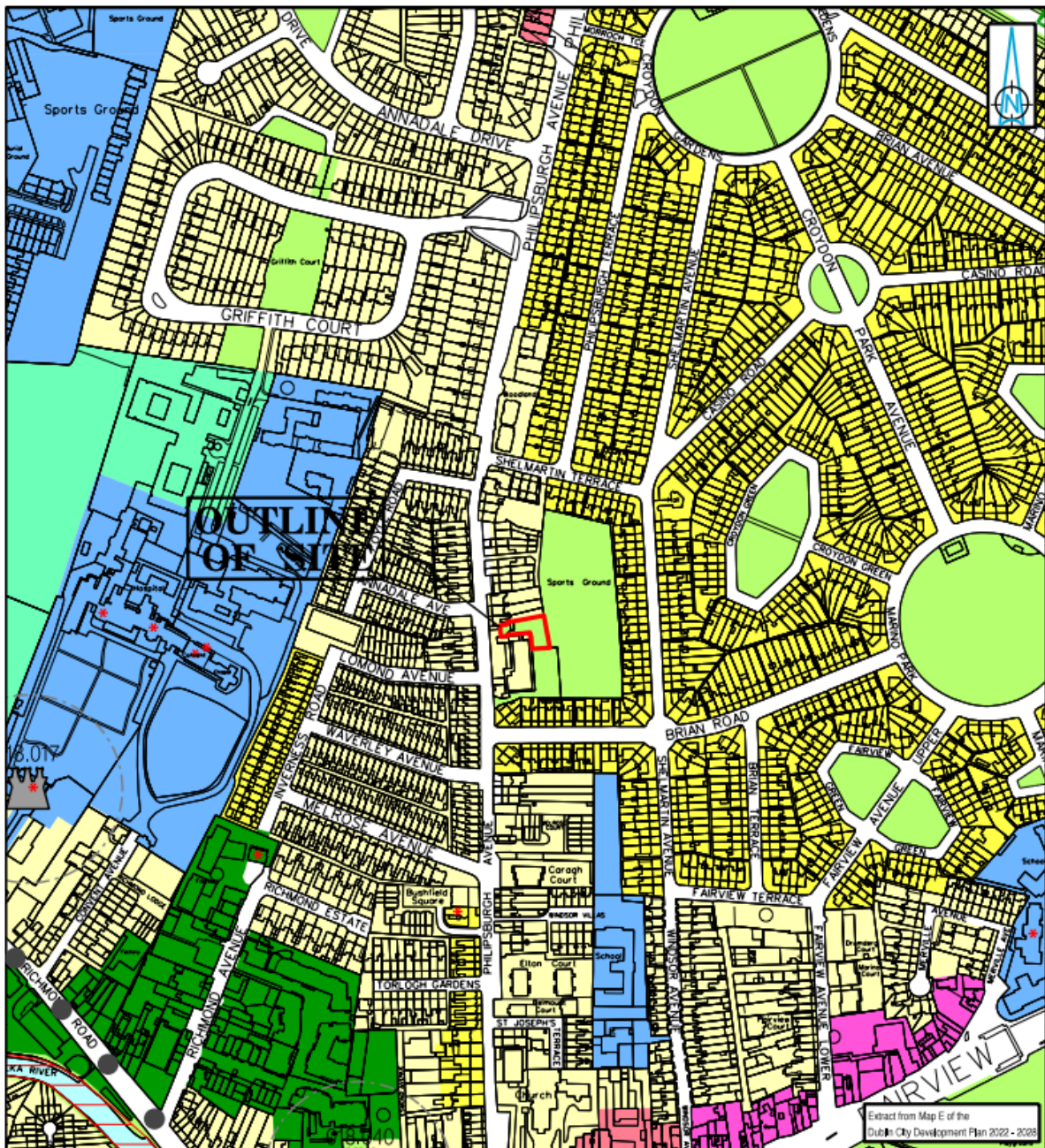
It is proposed to vary the Dublin City Development Plan 2022-2028 by changing the land use zoning of part of a site (0.052 ha) at 80 Philipsburgh Avenue, Dublin 3

**From:           Zoning Objective Z9 – To preserve, provide and improve recreational amenity, open space and ecosystem services.**

**To:               Zoning Objective Z1 – To protect, provide and improve residential amenities.**

This proposed draft variation is delineated on the attached map below, Figure 1, an extract from Map E, Volume 3 of the Dublin City Development Plan 2022 – 2028.

**Note:** This is a zoning map change only and requires no change to the written statement.



Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

## PROPOSED VARIATION OF THE DUBLIN CITY DEVELOPMENT PLAN 2022 - 2028 Site at 80 Philipsburgh Ave, Dublin 3

AREA HIGHLIGHTED REZONED FROM  
Z9: Amenity / Open Space Lands / Green Network  
TO  
Z1: Sustainable Residential Neighbourhoods

**Figure 1: Location of Proposed Variation (No. 4) to the Dublin City Development Plan 2022-2028 at 80 Philipsburgh Avenue, Dublin 3**

## 1.2 Location of and Purpose Of The Proposed Draft Variation

The subject lands are located at Philipsburgh Avenue in Dublin 3 in a well established residential area of Fairview. The subject lands (0.052ha) are within the Fairview pitch and putt course, an 18 no. hole course which is located to the rear of property on Philipsburgh Avenue, Shelmartin Terrace and Brian Road and which is accessed from Philipsburgh Avenue.

The subject lands comprise a small part of the pitch and putt course (two tee boxes) and there is a portocabin located on the lands.

The subject lands are located to the north / north east of a two storey brick building (former CYMC building) and car parking area which fronts onto and is accessed from Philipsburgh Avenue. The lands lie to the south of residential property, specifically a single storey house and its rear garden.

The area is well served by the Dublin Bus network and Clontarf train station is located within 1km of the lands.

The existing two storey former CYMC building is set back off Philipsburgh Avenue and is zoned for residential purposes - Z1 (Sustainable Residential Neighbourhoods). The area to the rear, that incorporates the pitch and putt course and which includes the subject lands is zoned Z9 (open space/amenity/ green networks). The rear car park of the former CYMC building is also zoned Z9 (open space/amenity/green networks).

Dublin City Council issued a notice to grant planning permission to Cabhrú Housing Association in early 2023 for 42 residential apartments for independent living for older residents (60 years plus) on lands comprising the former CYMC building, its car park and the lands the subject of this proposed draft variation under Reg. Ref. 5176/22. This decision is currently under appeal. All buildings on the site are proposed to be demolished.

The subject lands were zoned for residential purposes - Z1 (residential) - under the 2016 – 2022 Dublin City Development Plan. The lands were rezoned to Z9 (Amenity/Open Space Lands/Green Network) under the 2022 – 2028 Dublin City Development Plan which came into effect in December 2022.

The purpose of the proposed draft Variation is to rezone the subject lands from Z9 (Amenity/Open Space Lands/ Green Network) to Z1 (Sustainable Residential Neighbourhoods) to facilitate the development of lands for residential purposes, in conjunction with the adjoining residential lands (former CYMC building and car park), at Philipsburgh Avenue.

Cabhrú Housing Association, who propose to develop the lands under Reg. Ref. 5176/22, is seeking that the lands be rezoned back to a residential land use zoning to facilitate the development of lands. .

In a letter to the City Planning Officer on 22<sup>nd</sup> December 2022, Cabhrú Housing Association advised that agreement has been reached with the Pitch and Putt Club on the relocation of the two tee boxes to the satisfaction of the Pitch and Putt club that resolves the risk from redevelopment having a negative impact on the course. Cabhrú Housing Association have

requested that consideration be given to initiating a Variation process to the Development Plan to re-instate the Z1 zoning to the relevant portion of lands.

The Planning Authority agrees with this request on the grounds that a more compact and consolidated form of housing development can be provided on the wider lands without detriment to the existing Fairview pitch and putt course (subject to a written agreed reconfiguration of the course to ensure the continued effective functioning of the pitch and putt course).

### 1.3 Planning Context

Under the *Dublin City Development Plan 2022-2028*, the subject site, located on Map E, Volume 3 to the CDP, is zoned Zone Z9 (Open Space/ Amenity/Green Networks) where the objective is *'To preserve, provide and improve recreational amenity, open space and ecosystem services'*. There are no specific objectives attaching to the variation site.

Adjoining lands to the west, north and south are zoned Z1 (Sustainable Residential Neighbourhoods) where the objective is to *'To protect, provide and improve residential amenities'*. There are no specific objectives attaching to adjacent lands beside the variation site.

## 2.0 Flood Risk Guidance

The 2009 Guidelines recommend a staged approach to Flood Risk Assessment (pg 14):

**Stage 1** – identify any flood risks issues

**Stage 2** – where flood risk issues arise, identify the sources and access available mapping with flood risk extents

**Stage 3** – detailed flood risk assessment

The CDP's SFRA provides a flood extents map for the entire area of the city. This comprises the three flood zone classifications identified in the Guidelines, Flood Zones A, B and C. Flood Zones A and B are described as being of high probability of flooding and moderate probability of flooding respectively and low probability of flooding for Flood Zone C (pg 24). These are colour coded (dark blue and lighter blue for Flood Zones A and B respectively) and where no colour is equivalent to Flood Zone C.

Land-uses and types of development are accorded a vulnerability class, as set out in Table 3.1 of the Guidelines (pg 25). The intended land use of the proposed variation is principally residential in nature, i.e. *'dwelling houses'* and *'Dwelling houses designed, constructed or adapted for the elderly or, other people with impaired mobility;....'*. The vulnerability class is therefore described as a *'highly vulnerable development'*. A matrix of what vulnerability class is appropriate for each flood zone has been provided in Table 3.2 of the Guidelines (pg 26), see extract below.

	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate

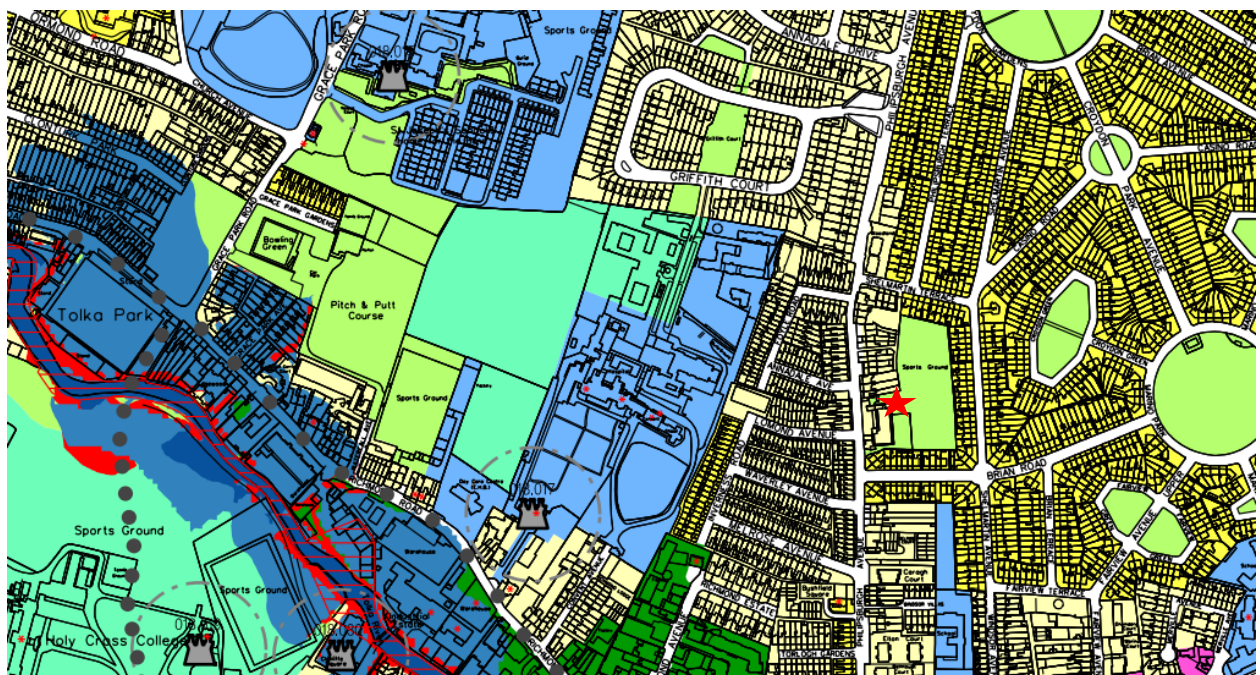
Table 3.2: Matrix of vulnerability versus flood zone to illustrate appropriate development and that required to meet the Justification Test.

**Extract:** Table 3.2: Matrix of vulnerability versus flood zone to illustrate appropriate development and that required to meet the Justification Test (taken from the 2009 Planning Flood Risk Management Guidelines).

For ‘*highly vulnerable development*’, a plan-making justification test is required for lands in Flood Zone A and Flood Zone B but not for Flood Zone C as these are considered ‘Appropriate’.

The site is located in Flood Zone C, which from the above is considered ‘*appropriate*’ for highly vulnerable development, such as housing for the elderly, a proposed intended use on the variation site.

An extract from the Dublin City Council Map E Flooding Map is set out below under Figure 2, demonstrating the above categorisation of the variation site. The approximate location of the variation site is marked with a red star.



**Figure 2:** Subject site indicated approximately with a red star, located to the east of Philipsburgh Avenue, Fairview, Dublin 3. (For Variation site extents, see Figure 1 above delineated in red.)

**Source:** Extract from DCC CDP, SFRA Volume 7, Zoning Map E with Flood mapping overlay.

### 3.0 Conclusion

The Flood Risk Assessment for the Proposed Variation no. 4 on a site (0.052ha) at 80 Philipsburgh Avenue, Dublin 3 has been undertaken in accordance with the requirements of Section 28 Guidelines for Planning Authorities: *'The Planning System and Flood Risk Management'*, 2009, as amended.

The subject site, with a Flood Zone C classification, does not require a justification test at this time, as the proposed land-zoning use, Z1 (Sustainable Residential Neighbourhoods) and likely development use for these lands, residential in nature, while considered a highly vulnerable use is located on land that has been classified as having a low probability of flooding.

Notwithstanding the above assessment, any future planning proposal for development on the variation site will be required to comply with the Development Plan for surface water management.

This is to ensure that there is no increase in flood risk to properties upstream or downstream as a result of future development. This will be captured under the Development Management process.

Having reviewed the flood risk assessment in accordance with the above Guidelines the following has been determined:

**The proposed variation, that seeks to change an area of land (0.052ha) from Z9 to Z1, and where the primary use of such a zoning objective is largely likely to be residential in nature is located on land that is classified as Flood Zone C (a low probability of flooding), where residential use (categorised as a vulnerable use) is considered appropriate and not requiring a justification test under the Section 28 Guidelines for Planning Authorities: *'The Planning System and Flood Risk Management'*, 2009, as amended. Therefore any future planning application that may arise from same that adequately addresses, through design, the flood risk/surface water requirement as part of the planning application process, through development management, is not likely to change flood risk in the area, upstream or downstream.**