Draft Ballina LAP Strategic Flood Risk Assessment

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This report describes work commissioned by Mayo County Council.

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Purpose

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1D	One Dimensional (modelling)
2D	Two Dimensional (modelling)
AEP	Annual Exceedance Probability
AFA	Area for Further Assessment
CFRAM	Catchment Flood Risk Assessment and Management
DTM	Digital Terrain Model
EPA	Environmental Protection Agency
FEH	Flood Estimation Handbook
FFL	Finished Floor Level
FRA	Flood Risk Assessment
FRMP	Flood Risk Management Plan
FRR	Flood Risk Review
FSU	Flood Studies Update
GIS	Geographical Information System
HEFS	High End Future Scenario
HPW	High Priority Watercourse
JFLOW	2-D hydraulic modelling package developed by JBA
JT	Justification Test
LA	Local Authority
MCC	Mayo County Council
GCDP	Mayo County Development Plan
MPW	Medium Priority Watercourse
MRFS	Medium Range Future Scenario
OPW	Office of Public Works
OSi	Ordnance Survey Ireland
PFRA	Preliminary Flood Risk Assessment
RSES	Regional Spatial and Economic Strategy
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SuDS	Sustainable Drainage Systems

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1 Introduction

JBA Consulting was appointed by Mayo County Council to carry out the Strategic Flood Risk Assessment for the Ballina Local Area Plan 2023-20292024-2030.

This report details the SFRA for this area and has been prepared in accordance with the requirements of the DoEHLG and OPW Planning Guidelines, The Planning System and Flood Risk Management¹; these guidelines were issued under the Planning and Development Act 2000 and recognise the significance of proper planning to manage flood risk.

1.1 Terms of Reference

Under the "Planning System and Flood Risk Management" guidelines, the purpose for the FRA is detailed as being "to provide a broad (wide area) assessment of all types of flood risk to inform strategic land-use planning decisions. SFRAs enable the LA to undertake the sequential approach, including the Justification Test, allocate appropriate sites for development and identify how flood risk can be reduced as part of the development plan process".

The Ballina Local Area Plan $\frac{2023-2029}{2024-2030}$ (BLAP) will be the key document for setting out a vision for the development of Mayo during the plan period.

It is important that the BLAP fulfils the requirements of the document "The Planning System and Flood Risk Management Guidelines for Planning Authorities" (OPW/DoEHLG, 2009) which states that flood risk management should be integrated into spatial planning policies at all levels to enhance certainty and clarity in the overall planning process.

In order to ensure that flood risk is integrated into the BLAP, the main requirements of the SFRA are to:

- Produce Flood Zone Mapping for the 2023-20292024-2030 plan.
- Prepare a Stage 2 Flood Risk Assessment of Ballina in particular in relation to location and type of zoning and land-use proposals, with a focus on new or changed zoning compared with the current plan.
- Review and update the policy guidance within the SFRA in compliance with OPW/DoEHLG "The Planning System and Flood Risk Management –Guidelines for Planning Authorities (OPW/DoEHLG, 2009)".
- Take cognizance of the Mayo County Council Climate Adaptation Strategy 2019-2024, the National Climate Adaptation Framework and the various environmental and visual designations applicable to Ballina.
- Advise on zonings/land use-proposals and appropriate mitigation measures, assess and report on any submissions received as part of both the preparation and the public consultation stage of the plan, as they relate to flood risk.

1.2 Report Structure

This study considers the development strategy that will form part of the Development Plan for Ballina. The context of flood risk in Ballina is considered with specific reference to a range of flood sources, including fluvial, tidal, pluvial, groundwater, sewer and artificial reservoirs and canals.

¹ DoHELG and OPW (2009) The Planning System and Flood Risk Management: Guidelines for Planning Authorities

A two-stage assessment of flood risk was undertaken, as recommended in 'The Planning System and Flood Risk Management' guidelines, for the area that lies within the development boundary of the Development Plan. The first stage is to review historical records of flooding in the town and environs.

Historical records and recent events demonstrate that Ballina has a history of flooding and confirms that a proportion of zoned lands are at flood risk. The Ballina Flood Relief Scheme has commenced but options and delivery of the scheme is still unlikely to occur within the timeframe of the LAP and so the SFRA must protect lands for infrastructure and also ensure that development within Flood Zones A/B is sustainably managed.

The second stage and the main purpose of this SFRA report is to appraise the adequacy of existing information, to prepare a Flood Zone map, based on available data, and to highlight potential development areas that require application of the Justification Test and/or more detailed assessment on a site specific level. The SFRA also provides guidelines for development within areas at potential risk of flooding, and specifically looks at flood risk and the potential for development within a number of key sites in Ballina.

Section 2 of this report provides an introduction to the study area and Section 3 discusses the concepts of flooding, Flood Zones and flood risk as they are incorporated into the Planning System and Flood Risk Management.

In Section 4 the available data related to flooding is summarised and appraised and outlines the sources of flooding to be considered, based on the review of available data. This section also considers the flood management assets that are in place, including the various flood relief scheme which have been constructed, or are underway. Section 0 summarises the key sources of flooding.

Following this, Section 6 outlines the flood risk management policy and Section 7 provides guidance and suggested approaches to managing flood risk to development; the contents of this section will be of particular use in informing the policies and objectives within the Development Plan.

Section 8 contains the review of land use zoning objectives across the settlement it also summarises the application of the Justification Test to which specific responses are included in the Appendix.

2 Ballina Study Area

2.1 Introduction

The plan area comprises the full extent of Ballina and is located in the Moy and Killala bay catchment which includes the area drained by the River Moy and all streams entering tidal water in Killala Bay between Benwee Head and Lenadoon Point, Co. Sligo, draining a total area of 2,345km. Lands within the LAP contain a mix of agricultural, residential, and commercial lands.

2.2 Watercourses

The primary watercourse in the Ballina area is the River Moy which has a catchment area upstream of Ballina of approximately 2352km². The River Moy rises at the Ox Mountains in Sligo where it flows through Sligo, Roscommon and Mayo for 100kms to its outfall where it drains to Killala bay and the Atlantic ocean.

The River Moy flows through Ballina in a northerly direction to its outfall in Killala bay.

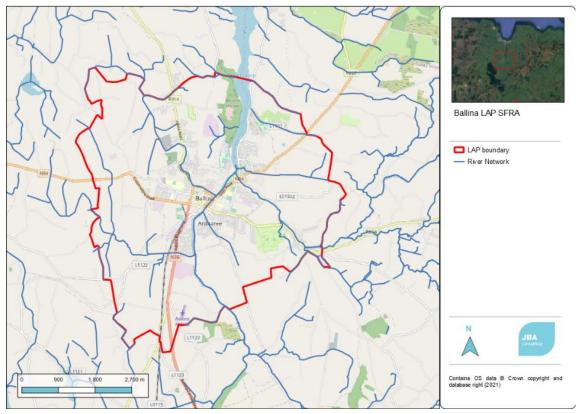


Figure 2-1: Ballina settlement and rivers

2.3 Current Planning Policy

2.3.1 Ireland 2040 – National Planning Framework

A Strategic Flood Risk Assessment of the National Policy Objectives (NPO) within the Ireland 2040 – National Planning Framework was undertaken with the aim of ensuring that flood risk is a key consideration in delivering the proposed strategic sustainable land-use planning decisions. It sets out how all levels of the planning process, from national level strategic assessments to individual planning applications, should follow the sequential approach set out in the 2009 Guidelines on Planning and Flood Risk Management.

The NPF recognises that it is not always possible to avoid developing in flood risk areas due to spatial, economic, environmental and physical constraints. Development should be encouraged to continue, and in flood risk areas should follow the sequential approach and application of Justification Test set out in the Department's Guidelines on the Planning System and Flood Risk Management. These guidelines will facilitate the integration of flood risk and land risk planning in the Northern and Western region, at all tiers of the planning hierarchy from national level through regional, city/county and local plans, masterplans and individual planning applications.

2.3.2 Regional Spatial & Economic Strategy (RSES)

The main purpose of the Regional Spatial and Economic Strategy (RSES) is to support the implementation of the NPF and wider Project Ireland 2040 aspirations. The RSES also supports the economic policies and objectives of the Government by providing a detailed strategic planning and economic framework for the development of the North-West Region. As Mayo forms part of the North-West Region, the plan must comply with the provisions of the RSES. The RSES provides a framework for the development of the region up to 2032. It focuses on the delivery of housing, job creation, infrastructure, community facilities and ensuring that the region remains attractive for investment.

Ballina is identified as a key county town which provides an anchor for employment in North Mayo and provides a valuable commuter service into Mayo. In terms of tourism it is also defined as a key destination town.

Of relevance to the SFRA is the overarching policy of ensuring a balance of development in the town centre of Ballina and providing for compact growth and brownfield development, regeneration within the town core particularly the former Imperial Hotel, the old Military Barracks as well as significant tracts of land directly adjacent to the main streets have the potential to bring about transformative change in Ballina. Since a proportion of the core town centre is at risk of flooding this presents a challenge when managing flood risk and development. There is also the backdrop of the Ballina Flood Relief Scheme, which is underway, but is unlikely to protect existing development until 2025 at the earliest. As such a precautionary approach has been undertaken.

2.3.3 The Mayo County Development Plan 2022-2028

The current Mayo County Development Plan covers the period 2022-2028. The plan sets out compliance with the National Planning Framework and the Regional Spatial and Economic Strategies. As part of the Mayo County Development Plan 2022-2028 a Strategic Flood Risk Assessment was undertaken in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The purpose of the SFRA is to identify flooding or surface water management issues related to the County to inform strategic land use planning decisions.

The Mayo County Development Plan 2022-2028 considered flood risk in reference to people, business, infrastructure, and the environment at risk of flooding. The GCDP proposed to minimize the risk of flooding through the identification and management of existing and particularly potential future flood risks. The SFRA proposed this be completed by following the sequential approach and application of the Justification Test set out in the 2009 Guidelines on Planning and Flood Risk Management (DoEHLG) throughout the planning process.

3 The Planning System and Flood Risk Management

3.1 Introduction

Prior to discussing the management of flood risk, it is helpful to understand what is meant by the term. It is also important to define the components of flood risk in order to apply the principles of the Planning System and Flood Risk Management in a consistent manner.

The Planning System and Flood Risk Management: Guidelines for Planning Authorities, published in November 2009, describe flooding as a natural process that can occur at any time and in a wide variety of locations. Flooding can often be beneficial, and many habitats rely on periodic inundation. However, when flooding interacts with human development, it can threaten people, their property and the environment.

This Section will firstly outline the definitions of flood risk and the Flood Zones used as a planning tool; a discussion of the principles of the planning guidelines and the management of flood risk in the planning system will follow.

3.2 Definition of Flood Risk

Flood risk is generally accepted to be a combination of the likelihood (or probability) of flooding and the potential consequences arising. Flood risk can be expressed in terms of the following relationship:

Flood Risk = Probability of Flooding x Consequences of Flooding

The assessment of flood risk requires an understanding of the sources, the flow path of floodwater and the people and property that can be affected. The source - pathway - receptor model, shown below in Figure 3-1, illustrates this and is a widely used environmental model to assess and inform the management of risk.

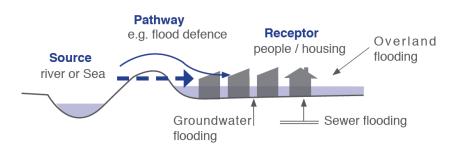


Figure 3-1: Source Pathway Receptor Model

Source: Figure A1 The Planning System and Flood Risk Management Guidelines Technical Appendices

Principal sources of flooding are rainfall or higher than normal sea levels while the most common pathways are rivers, drains, sewers, overland flow and river and coastal floodplains and their defence assets. Receptors can include people, their property and the environment. All three elements must be present for flood risk to arise. Mitigation measures, such as defences or flood resilient construction, have little or no effect on sources of flooding but they can block or impede pathways or remove receptors.

The planning process is primarily concerned with the location of receptors, taking appropriate account of potential sources and pathways that might put those receptors at risk.

3.3 Likelihood of Flooding

Likelihood or probability of flooding of a particular flood event is classified by its annual exceedance probability (AEP) or return period (in years). A 1% AEP flood indicates the flood event that will occur or be exceeded on average once every 100 years and has a 1 in 100 chance of occurring in any given year.

Return period is often misunderstood to be the period between large flood events rather than an average recurrence interval. Annual exceedance probability is the inverse of return period as shown in Table 3-1.

Table 3-1: Probability of Flooding

Return Period (Years)	Annual Exceedance Probability (%)
2	50
100	1
200	0.5
1000	0.1

Considered over the lifetime of development, an apparently low-frequency or rare flood has a significant probability of occurring. For example:

- A 1% flood has a 22% (1 in 5) chance of occurring at least once in a 25-year period the period of a typical residential mortgage;
- And a 53% (1 in 2) chance of occurring in a 75-year period a typical human lifetime.

3.4 Consequences of Flooding

Consequences of flooding depend on the hazards caused by flooding (depth of water, speed of flow, rate of onset, duration, wave-action effects, water quality) and the vulnerability of receptors (type of development, nature, e.g. age-structure, of the population, presence and reliability of mitigation measures etc).

The Planning System and Flood Risk Management guidelines provide three vulnerability categories, based on the type of development, which are detailed in Table 3.1 of the Guidelines, and are summarised as:

- **Highly vulnerable**, including residential properties, essential infrastructure and emergency service facilities;
- **Less vulnerable**, such as retail and commercial and local transport infrastructure;
- **Water compatible**, including open space, outdoor recreation and associated essential infrastructure, such as changing rooms.

3.5 Definition of Flood Zones

In the Planning System and Flood Risk Management guidelines, Flood Zones are used to indicate the likelihood of a flood occurring. These Zones indicate a high, moderate or low probability of flooding from fluvial or tidal sources and are defined below in Table 3-2.

It is important to note that the definition of the Flood Zones is based on an undefended scenario and does not take into account the presence of flood protection structures such as flood walls or embankments. This is to allow for the fact that there is a residual risk of flooding behind the defences due to

overtopping or breach and that there may be no guarantee that the defences will be maintained in perpetuity.

It is also important to note that the Flood Zones indicate flooding from fluvial and tidal sources and do not take other sources, such as groundwater or pluvial, into account, so an assessment of risk arising from such sources should also be made.

Table 3-2: Definition of Flood Zones

Zone	Description
Zone A High probability of flooding.	This zone defines areas with the highest risk of flooding from rivers (i.e. more than 1% probability or more than 1 in 100) and the coast (i.e. more than 0.5% probability or more than 1 in 200).
Zone B Moderate probability of flooding.	This zone defines areas with a moderate risk of flooding from rivers (i.e. 0.1% to 1% probability or between 1 in 100 and 1 in 1000) and the coast (i.e. 0.1% to 0.5% probability or between 1 in 200 and 1 in 1000).
Zone C Low probability of flooding.	This zone defines areas with a low risk of flooding from rivers and the coast (i.e. less than 0.1% probability or less than 1 in 1000).

3.6 **Objectives and Principles of the Planning Guidelines**

The Planning System and Flood Risk Management Guidelines describe good flood risk practice in planning and development management. Planning authorities are directed to have regard to the guidelines in the preparation of Development Plans and Local Area Plans, and for development control purposes.

The objective of the Planning System and Flood Risk Management Guidelines is to integrate flood risk management into the planning process, thereby assisting in the delivery of sustainable development. For this to be achieved, flood risk must be assessed as early as possible in the planning process. Paragraph 1.6 of the Guidelines states that the core objectives are to:

- "Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management".

The guidelines aim to facilitate 'the transparent consideration of flood risk at all levels of the planning process, ensuring a consistency of approach throughout the country.' SFRAs therefore become a key evidence base in meeting these objectives. The 'Planning System and Flood Risk Management' works on a number of key principles, including:

- Adopting a staged and hierarchical approach to the assessment of flood risk;
- Adopting a sequential approach to the management of flood risk, based on the frequency of flooding (identified through Flood Zones) and the vulnerability of the proposed land use.

3.7 The Sequential Approach & Justification Test

Each stage of the Flood Risk Assessment (FRA) process aims to adopt a sequential approach to management of flood risk in the planning process.

Where possible, development in areas identified as being at flood risk should be avoided; this may necessitate de-zoning lands within the development plan. If de-zoning is not possible, then rezoning from a higher vulnerability land use, such as residential, to a less vulnerable use, such as open space may be required.



Figure 3-2: Sequential Approach Principles in Flood Risk Management

Source: The Planning System and Flood Risk Management (Figure 3.1)

Where rezoning is not possible, exceptions to the development restrictions are provided for through the application of the Justification Test. Many towns have central areas that are affected by flood risk and have been targeted for growth. To allow the sustainable and compact development of these urban centres, development in areas of flood risk may be considered necessary. For development in such areas to be allowed, the Justification Test must be passed.

The Justification Test has been designed to rigorously assess the appropriateness, or otherwise, of such developments. The test is comprised of two processes; the Planmaking Justification Test, and the Development Management Justification Test. The latter is used at the planning application stage where it is intended to develop land that is at moderate or high risk of flooding for uses or development vulnerable to flooding that would generally be considered inappropriate for that land.

Table 3-3 shows which types of development, based on vulnerability to flood risk, are appropriate land uses for each of the Flood Zones. The aim of the SFRA is to guide development zonings to those which are 'appropriate' and thereby avoid the need to apply the Justification Test.

	Flood Zone A High Probability	Flood Zone B Moderate Probability	Flood Zone C Low Probability
Highly Vulnerable Development (Including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less Vulnerable Development	Justification Test	Appropriate	Appropriate
Water-Compatible Development	Appropriate	Appropriate	Appropriate

3.8 Scales and Stages of Flood Risk Assessment

Within the hierarchy of regional, strategic and site-specific flood-risk assessments, a tiered approach ensures that the level of information is appropriate to the scale and nature of the flood-risk issues and the location and type of development proposed, avoiding expensive flood modelling and development of mitigation measures where it is not necessary. The stages and scales of flood risk assessment comprise of:

- Regional Flood Risk Assessment (RFRA) a broad overview of flood risk issues across a region to influence spatial allocations for growth in housing and employment and to identify where flood risk management measures may be required at a regional level to support the proposed growth. This should be based on readily derivable information and undertaken to inform the Regional Planning Guidelines.
- Strategic Flood Risk Assessment (SFRA) an assessment of all types of flood risk informing land use planning decisions. This will enable the Planning Authority to allocate appropriate sites for development, whilst identifying opportunities for reducing flood risk. This SFRA will revisit and develop the flood risk identification undertaken in the RFRA and give consideration to a range of potential sources of flooding. An initial flood risk assessment, based on the identification of Flood Zones, will also be carried out for those areas zoned for development. Where the initial flood risk assessment highlights the potential for a significant level of flood risk, or there is conflict with the proposed vulnerability of development, then a site-specific FRA will be recommended, which will necessitate a detailed flood risk assessment.
- Site Specific Flood Risk Assessment (FRA) site or project specific flood risk assessment to consider all types of flood risk associated with the site and propose appropriate site management and mitigation measures to reduce flood risk to and from the site to an acceptable level. If the previous tiers of study have been undertaken to appropriate levels of detail, it is highly likely that the site-specific FRA will require detailed channel and site survey, and hydraulic modelling.

4 Data Collection and Review

This section reviews the data collection and the flood history for the settlements so that any additional information on flooding can be included within this SFRA. It will confirm the extent of extreme flooding (through the Flood Zone mapping) and key sources of flood risk.

Table 4-1: Available	Flood Data for Flo	ood Zone Development

Description	Coverage	Robustness	Comment on usefulness
Western CFRAM Flood Mapping	Covers the River Moy and tributaries	High AFA status	Detailed 1D/2D CFRAM HPW model and is useful. Site verified by walkover and consultation with local authority. In general, CFRAM provides all information needed to apply the Justification Test (JT) for Plan Making under the SFRA.
Ballina FRS Mapping	Covers the River Moy and tributaries	High	Data has been requested from OPW and decision is pending. Currently not used in the assessment, but is generally similar or less extensive than the CFRAM data (comparison only with 1% AEP).
National Coastal Flood Hazard Mapping (NCFHM)	<u>Covers the Moy</u> <u>Estuary and</u> <u>part of Ballina.</u>	High	Maps show worst case scenario, any flood defences potentially protecting the coastal floodplain are not taken into account, and so are in- line with the definition of the Flood Zones as set out in the Guidelines. NCFHM maps are based on more up-to-date estimates of extreme coastal levels than those used for the CFRAM coastal maps As such the NCFHM maps have been considered in preference to the CFRAM with regards to the definition of the Coastal Flood Zones and application of the JT.
National Indicative Fluvial Mapping (OPW)	Flood maps showing indicative areas modelled to be inundated during a theoretical fluvial flood event with an estimated probability of occurrence. The	Moderate - The National Indicative Fluvial Maps provide an indication of areas that may flood during a flood of an estimated probability of occurring and are based on certain assumptions. The National Indicative Fluvial Maps are not the best achievable representation of flood extents and they are not as accurate as	This data is broadscale and based on remotely sensed ground models. It has been used to form the basis of Flood Zones where CFRAM or other detailed modelling study is not available. Has been used as an initial screening tool for flood extents and should be

	study did not model catchments <5km2. See OPW user guide for more details.	the Flood Maps produced under the National Catchment Flood Risk Assessment and Management (CFRAM) Programme. The maps should not be used to assess the flood risk associated with individual properties or point locations, or to replace a detailed site-specific flood risk assessment.	reviewed as part of site specific FRAs. There is no modelled water level or depth associated with this dataset.
OPW PFRA flood extent maps	Covers the river Moy and tributaries.	Moderate	CFRAM and NIFM mapping supersedes all fluvial PFRA mapping. PFRA has not been used in this study.
Historical Flood Event Outlines	Coverage of most of LAP area from 2009 flood event	Moderate	Used indirectly to validate flood zones. Useful background information for flooding in specific areas of the settlement.

Table 4-2 Other Available Data

Description	Coverage	Robustn ess	Comment on usefulness
GSi Groundwater and Surface Water flood information	Full Study Area	Moderate	Provides both historic and predictive flood extents for groundwater and historic surface water flooding.
Alluvial Soils Maps	Full Study Area	Low	Used to provide indication of risk in areas with no other mapping available.
Groundwater vulnerability maps	Broadscale, County wide	Moderate	Initial assessment of groundwater vulnerability. Provides a screening tool for use in FRA.
Site Walkover	Specific areas of interest	Moderate	Helpful for assessing flood risk in areas where mapping is unavailable. Used to verify existing mapping.
Historic Flood Records including photos, aerial photos and reports.	Coverage of most of LAP area from 2009 flood event and spot coverage for other events	Various	Highly useful oversight of historic flooding issues provided by Local Authority.
LiDAR height model	Ballina area	High	Aerial survey is used to appraise the topography and identify low spots, floodplain and areas potentially susceptible to flooding.

All sources of available flood mapping were reviewed and the best available dataset is used, which in this case is the CFRAM.

Specific guidance is provided for each area of Ballina based on the data review and the site visit is used to confirm the most appropriate dataset and flood extents to define

the Flood Zones. During the site visit (attended by Local Authority Engineers and Planners) the flood mapping was appraised on site by an experienced flood risk manager and professional opinion and judgement has been used to develop the recommendations within the Settlement Review of Section 8.

The review of the suite of flood risk data has been developed as a spatial planning tool to guide MCC in making land-use zoning and development management decisions. The data sets have been deemed appropriate for the planning decisions being made at this stage of the plan making process and where flood risk is identified the following approach has been undertaken;

- Application of the Justification Test and/or;
- Further detailed analysis, or;
- Rezoning to a less vulnerable use, or;
- Further assessment at Development Management stage in limited circumstances where it has been determined that development should be possible in principle, taking into account a site specific opinion.

Where CFRAM modelling has been carried out (on the River Moy and tributaries), flood levels are available at selected node points along the watercourse. Once an appropriate level of validation has been undertaken as part of the site-specific FRA, these flood levels may be used to form the basis of the development design.

4.1 Historic Flooding

A number of areas in Ballina have been affected by flooding historically. Several sources were consulted to identify previous flood events including the OPW floodinfo.ie website, newspaper articles and previous flood studies. Floodinfo.ie provides information on historical flood events across the country and formed the basis of the Regional Flood Risk Assessment. Information is provided in the form of reports and newspaper articles which generally relate to rare and extreme events.

Location	Start Date	Description
Moynalty, Ballina	November 1989	River Moy overflowed and a retaining wall fell down.
Ballina	December 2013- January 2014	Flooding in Ballina, due to extensive rainfall and high tides
Ballina	December 2015	Bachelor's Walk, Arbuckle Row and Clare Street suffered extensive flood damage
Ballina	August 2019	Parts of Ballina flooded due to extensive rainfall
Bachelor's Walk, Ballina	Recurring	Flooding at Bachelor's Walk due to River Moy bursting its banks.
Howley street/Sligo road, Ballina	Recurring	Flooding during high tides.
Humbert Street	Undated flood	Rare event
Barrett Street	Undated flood	Rare event due to extreme high tides
Quignamanger	Undated flood	Road flooding due to extreme high tides

Table 4-3 Flood History



Figure 4-1 Historic flood events Ballina

4.2 Site Walkover

As part of the SFRA process a site walkover and consultation was undertaken Ballina by an experienced Flood Risk Manager alongside the Local Authority Engineer. The site walkover took place on 11/11/2021 and aimed to assess risks presented by potentially unmapped watercourses and to verify CFRAM and PFRA/NIFM mapping.

The walkover took place at specific locations throughout Ballina based on CFRAM mapping and the previous LAP SFRA walkover. The flood mapping and previous SFRA were also found to be in agreement with observations made during the walkover.

4.3 PFRA & NIFM

The Preliminary Flood Risk Assessment (PFRA) is a national screening exercise that was undertaken to identify areas at potential flood risk. The PFRA is a requirement of the EU Floods Directive and the publication of this work has led to, and has informed, more detailed assessment, which is being undertaken as part of the Catchment Flood Risk Assessment and Management (CFRAM) studies. The PFRA study considered flooding from several sources, including fluvial, tidal, pluvial and groundwater, and resulted in a suite of broadscale flood maps.

The PFRA fluvial data has now been replaced by NIFM fluvial flood extents, however this is only the case where CFRAM flood outlines are not provided and where the catchment is greater than 5km². There are no NIFM watercourses is one NIFM watercourse within the settlement boundary of Ballina and the PFRA is not used.

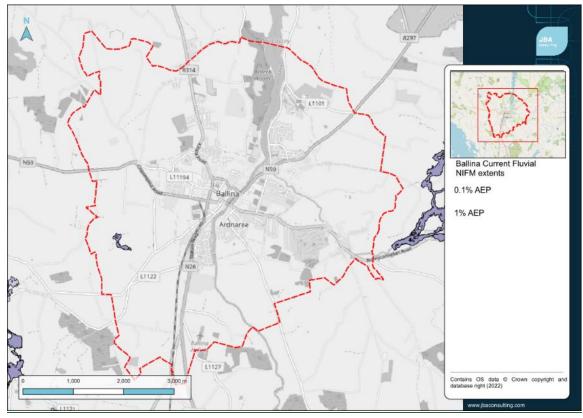


Figure 4-2 NIFM fluvial mapping Ballina

4.4 GSI Groundwater Flood

The winter of 2015/2016 saw the most extensive groundwater flooding ever witnessed in Ireland. The lack of data on groundwater flooding and fit-for-purpose flood hazard maps were identified as serious impediments to managing groundwater flood risk in vulnerable communities. Geological Survey Ireland - in collaboration with Trinity College Dublin and Institute of Technology Carlow - initiated the groundwater flood project GWFlood to address these deficits. Data available as a result of the project include national-scale flood maps for both historic and predictive groundwater flooding.

The historic groundwater flood map is primarily based on the winter 2015/2016 flood event, which in most areas represented the largest groundwater flood event on record. The map was produced based on the SAR imagery of the 2015/2016 event as well as any available supplementary evidence.

The predictive groundwater flood map presents the probabilistic flood extents for locations of recurrent karst groundwater flooding. It consists of a series of stacked polygons at each site representing the flood extent for specific AEP's mapping floods that are expected to occur every 10, 100 and 1000 years (AEP of 0.1, 0.01, and 0.001 respectively). The map is focussed primarily (but not entirely) on flooding at seasonally inundated wetlands known as turloughs. Sites were chosen for inclusion in the predictive map based on existing turlough databases as well as manual interpretation of SAR imagery.

The mapping process tied together the observed and SAR-derived hydrograph data, hydrological modelling, stochastic weather generation and extreme value analysis to generate predictive groundwater flood maps for over 400 qualifying sites. It should be noted that not all turloughs are included in the predictive map as some sites could not be successfully monitored with SAR and/or modelled.

There has been previous surface water flooding in the area however there is no predicted groundwater flood groundwater flooding within the LAP boundary.

4.5 GSI Surface Water Flooding

Geological Survey Ireland - in collaboration with Trinity College Dublin and Institute of Technology Carlow - initiated the groundwater flood project GWFlood to address deficits in groundwater flooding and fit-for-purpose flood hazard maps.

In addition to the historic groundwater flood map, the flood mapping methodology was also adapted to produce a surface water flood map of the 2015/2016 flood event. This flood map encompasses fluvial and pluvial flooding in non-urban areas and has been developed as a separate product. The historic surface water flood map is displayed within Figure 4-3.

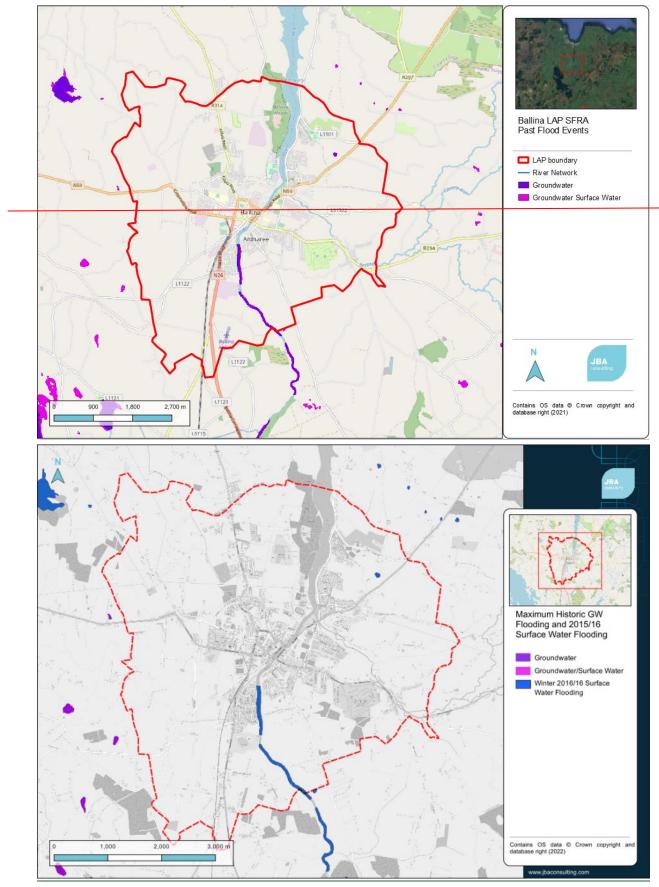


Figure 4-3 Maximum Historic Groundwater Flooding

4.6 CFRAM

In 2011 the OPW commenced appointment of consultants to carry out a more detailed flood risk assessment on key flood risk areas. This work was undertaken under the CFRAM programme across seven river basin districts in Ireland. The Western RBD includes the entire catchment of the River Western and its estuary, covering some 17,800km2 and 20% of the island of Ireland. The RBD covers parts of 17 counties: Limerick, Clare, Tipperary, Offaly, Westmeath, Longford, Roscommon, Kerry, Mayo, Leitrim, Cavan, Sligo, Mayo, Cork, Laois, Meath and Fermanagh.

The initial Flood Risk Review (FRR) stage of the of the Western CFRAM included a sitebased review of the PFRA flood outlines at a number of settlements. Several communities were identified through this process as being at potentially significant flood risk in the Western Upper & Lower River Basin, which included Ballina. Following this review, any sites recommended as an Area for Further Assessment (AFA) were included in the subsequent detailed assessment stage of each CFRAM study.

A set of flood maps, indicating the areas prone to flooding, has been developed and published for each of the communities. The Plan builds on and supplements the national programme of flood protection works completed previously, that are under design and construction at this time or that have been set out through other projects or plans, and the ongoing maintenance of existing drainage and flood relief schemes.

The modelled CFRAM flood extents suggest that Ballina Town and Environs is at risk from both tidal and fluvial flooding. There are two primary causes of flooding from the Moy; high tides with floods that subside after a number of hours, or prolonged fluvial flooding due to intense periods of rainfall and resulting high flows. The reach of the Moy downstream of the Salmon Weir bridge is tidally influenced while upstream is fluvial. The dominant flood mechanism on tributaries is fluvial flooding due to intense rainfall events and blockage of culverts on urban watercourses. The fluvial and tidal extents for Ballina are shown in Figure 4-4 Figure 4-5

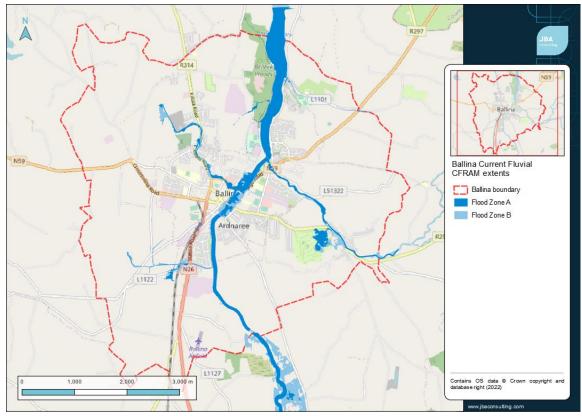


Figure 4-4 CFRAM Fluvial Extents for Ballina Town and Environs

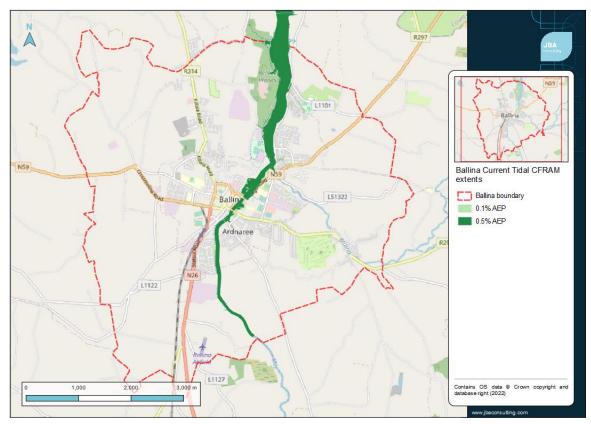


Figure 4-5 CFRAM Coastal Extents for Ballina Town and Environs

Climate change is likely to have a considerable impact on flood risk in Ireland, such as through rising mean sea levels, increased wave action and the potential increases in winter rainfall and intense rainfall events. Land use change, for example, through new housing and other developments, can also increase potential future flood risk. In order to assess this risk, the Western CFRAM study also included detailed assessments of flooding and impacts for potential future climate change scenarios.

The modelled CFRAM fluvial HEFS extents for Ballina show increases in the extents on the left bank of the Moy in the town centre, Beleek Woods and the Childer's Heights area. The right bank also sees some increases in extent in the town centre and Ardnaree. The Quignamanger River is moderately sensitive to climate change on both left and right banks in the Ballina Golf Course area to the southeast of its confluence with the Moy. The Tullyegan river to the west of Station road. The 0.1% + Climate Change fluvial mapping for Ballina can be seen in Figure 4-4.

The CFRAM Coastal outlines for the 0.1% + Climate Change show moderate to high sensitivity to climate change south of the Salmon Weir bridge in Ballina town centre and on the left bank to the north at Beleek woods. There are also some increases in extent at the confluences of the Bunree River and the Brusna due to the tidal influence of the Moy affecting rate of discharge to the Moy. The 0.1% + Climate Change fluvial mapping for Ballina can be seen in Figure 4-10.

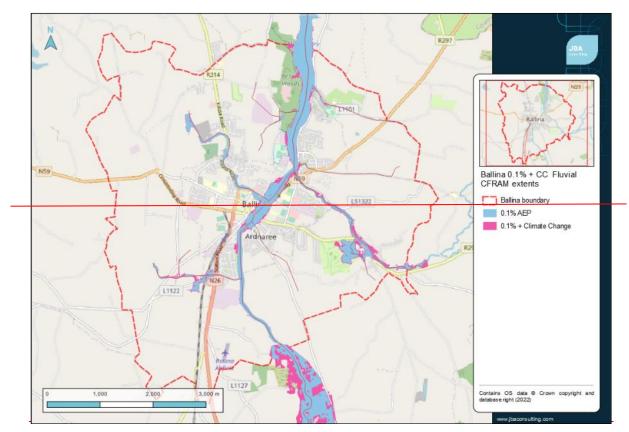


Figure 4-6 0.1% + Climate Change Fluvial CFRAM extents

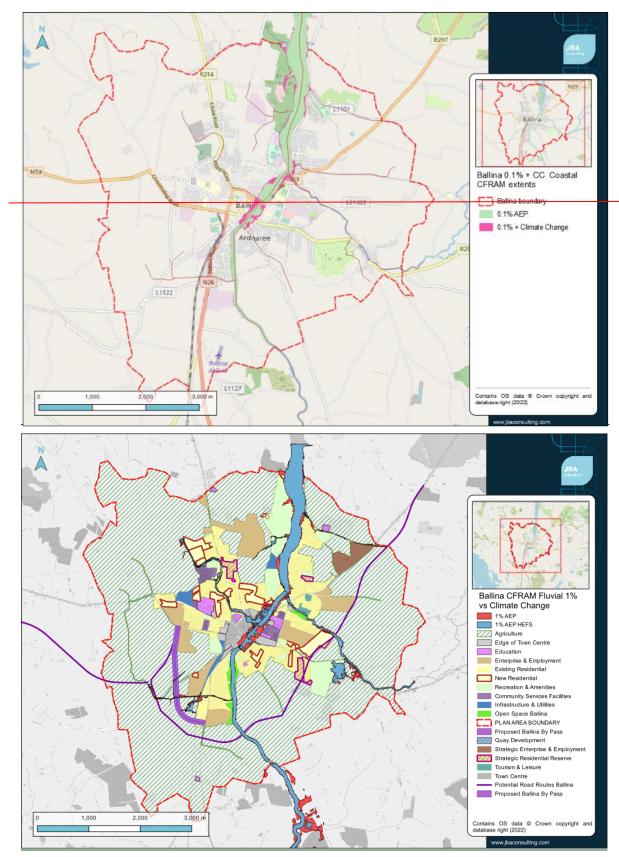


Figure 4-7 0.1% + Climate Change Coastal 1% vs HEFS Fluvial CFRAM extents

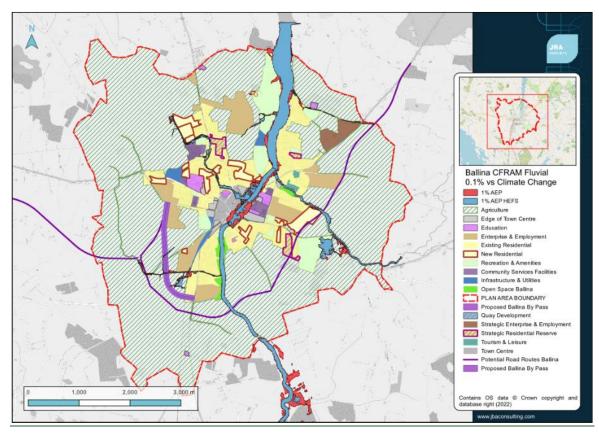


Figure 4-8 0.1% vs HEFS Fluvial CFRAM extents

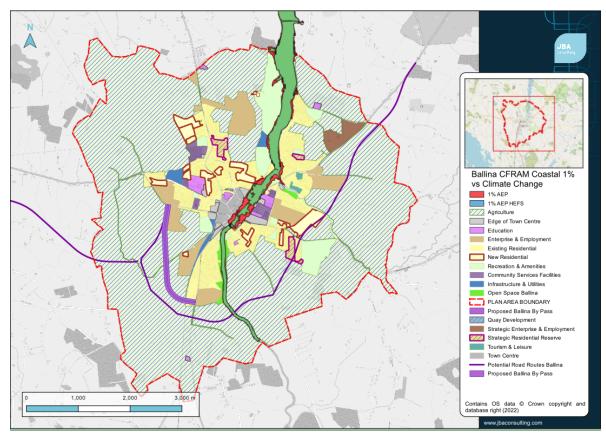


Figure 4-9 1% vs HEFS Coastal extents

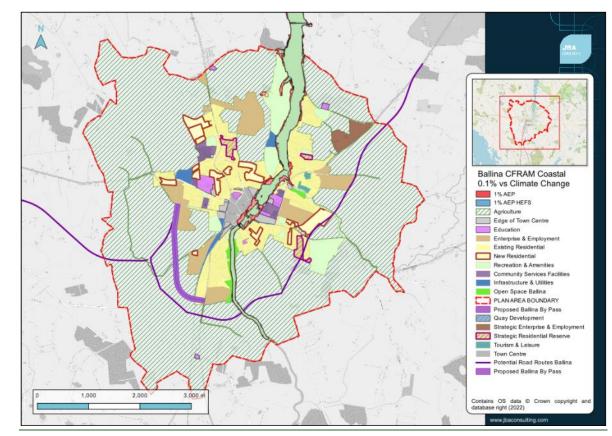


Figure 4-10 0.1% vs HEFS Coastal CFRAM extents

4.7 Existing Ballina Defences

Formal and informal defences exist along the River Moy, the Owenbeg River and the Knockbeg River. These defences were not assumed to function as flood defences during the CFRAM study and were either bypassed by the model or were removed to allow flooding beyond them. The Knockanelo river was found not to overtop in the 10% AEP flood event. The CFRAM study found that this suggests that flood walls along Circular Road, and the flood relief culvert on the Knockanelo River provide around 10% AEP standard of protection.

The flood relief culvert near Libadore reduces flow in the watercourse in the 1% and 0.1% AEP events, however further upstream, floodwaters spill on to the Killala Road and re-enters downstream of the culvert, bypassing the inlet to the culvert.

4.8 Ballina Flood Relief Scheme

The Ballina Flood Relief Scheme was initially found to be an area for further assessment in 2012 under the OPW CFRAM study and subsequently in a number of potential flood relief/protection measures were identified and assessed to be viable and effective to reduce flooding for the vulnerable properties located in Ballina Town. In February 2020, Mayo County Council in partnership with the OPW appointed RPS Consulting Engineers Ltd to further assess the CFRAM Study identify options and prepare a detailed scheme for Ballina which is economically viable, socially acceptable and environmentally sustainable. The entire scheme will be implemented in five different stages. Stage I is currently ongoing which has commenced in March 2020 with stage II expected to begin in 2024. Currently the preferred scheme is being further developed to a level that is sufficiently detailed to allow the completion of the EIAR and planning application. At this stage the details are therefore not finalised, but objectives should be put in place to safeguard likely infrastructure. Flood Zone data has been requested from OPW and the SFRA will be updated when the data is made available.

As part of stage 1,emerging preferred options have been identified for the proposed scheme which includes works along the River Moy as well as a number of tributaries. These options include:

- River Moy
 - $\circ~$ Construction of New flood defence walls along the Moy with height of 0.45m-1.2m on defended side
 - Replacement of existing river walls at Ridgepool Road, Cathedral Road, Clare Street, Bachelors Walk and the river bank parallel to Barrett Street
 - o Glass flood walls along Emmet street and potentially flood gates
 - Hard defences at Ballina Quay
- Quignamanger
 - Replacement of 0.9m culvert with 1.5m culvert
 - Flood defence at downstream end of Quignamanger Stream
 - Upgrade culvert at Quay road crossing
- Bunree/Behy Road
 - Replacement of existing culvert and open channel arrangement with a 1.2m diameter culvert for upstream reach and 1.5m diameter culvert for downstream reach
 - Removal of culvert downstream of N59
- Brusna
 - Construction of 610m long flood wall and 240m long embankment along Brusna River with an average height of 0.9m above existing ground level

- \circ $\;$ Introduction of a beam structure to span the width of the river
- Raising of access road to Shanaghy Heights Bridge
- Tullyegan
 - \circ Construction of 260m long flood wall with an average height of 0.46m above ground level
- Knockanelo
 - $\circ~$ Upgrade of culvert inlet to divert 6085% of 1%AEP flood flows to diversion culvert at Libadoré
 - Replacement of existing twin culverts with a 2.1m diameter culvert to follow route of existing southern culvert

5 Sources of Flooding

This SFRA has reviewed flood risk from fluvial, pluvial and groundwater sources. Flooding events have become more pronounced in Ireland, and County Mayo, in recent years. Climate change risks also need to be considered at a strategic and site-specific scale. Climate change is discussed in Section 4.6 in relation to incorporation of climate change into the SFRA. A comment on the likely impacts of climate change, on a settlement basis, has been provided in Section 8.

5.1 Fluvial Flooding

This is the principal source of flood risk to Ballina. Flooding from rivers and streams is associated with the exceedance of channel capacity during times of heavy rainfall resulting in higher flows. The process of flooding from watercourses depends on numerous characteristics associated with the catchment including; geographical location and variation in rainfall, steepness of the channel and surrounding floodplain and infiltration and rate of runoff associated with urban and rural catchments. Generally, there are two main types of catchments; large and relatively flat or small and steep, both giving two very different responses during large rainfall events.

Areas along the Moy River, in particular to the west of the town are prone to flooding with Fluvial being the dominant source of flooding south of the Salmon Weir bridge and along Emmet Street. Tributaries in the town and environs are all Fluvially dependent. Flood risk relating to specific areas of Ballina is discussed in Section 8 and has been used to inform the zoning objectives for the Development Plan.

5.2 Tidal Flooding

Ballina is located upstream of the Moy estuary. The River Moy is tidally influenced downstream of Salmon Weir bridge to its outfall c. 9600m to the north. The rate of discharge from tributaries north of the town centre will also be affected by the tide. Reports of previous flooding suggest that high tides during periods of prolonged rainfall further escalates flooding in the town centre around the Bachelor's walk area.

5.3 Drainage Districts

The River Moy Drainage District includes the River Moy and most of its tributaries within the settlement boundary. Drainage districts were established under the Arterial Drainage Act, 1945, and subsequent Amendment Act, 1995, they include channels/schemes that were undertaken prior to 1945 and are the responsibility of Local Authorities, rather than the OPW (who manage Arterial Drainage Schemes post-1945). The Act deals with the improvement of lands by drainage and preventing or substantially reducing the flooding of lands. The Act set up the process of Arterial Drainage Schemes and provides for the maintenance of these works. It also implements several drainage and flood reduction related measures such as approval procedures for bridges and weirs and iterates reporting requirements for Drainage Districts.

5.4 Pluvial Flooding

Flooding of land from surface water runoff is usually caused by intense rainfall that may only last a few hours. The resulting water follows natural valley lines, creating flow paths along roads and through and around developments and ponding in low spots, which often coincide with fluvial floodplains. Any areas at risk from fluvial flooding will almost certainly be at risk from surface water flooding.

5.5 Flooding from Drainage Systems

Flooding from artificial drainage systems occurs when flow entering a system, such as an urban storm water drainage system, exceeds its discharge capacity, it becomes blocked or it cannot discharge due to a high-water level in the receiving watercourse. Flooding in urban areas can also be attributed to sewers. Sewers have a finite capacity which, during certain load conditions, will be exceeded. In addition, design standards vary and changes within the catchment areas draining to the system, in particular planned growth and urban creep, will reduce the level of service provided by the asset. Sewer flooding problems will often be associated with regularly occurring storm events during which sewers and associated infrastructure can become blocked or fail. This problem is exacerbated in areas with under-capacity systems. In the larger events that are less frequent but have a higher consequence, surface water will exceed the sewer system and flow across the surface of the land, often following the same flow paths and ponding in the same areas as overland flow.

Foul sewers and surface water drainage systems are spread extensively across the urban areas with various interconnected systems discharging to treatment works and into local watercourses. The potential for pluvial flooding will be managed by the application of the specific policies on surface water, as displayed in Section 6.

5.6 Groundwater Flooding

Groundwater flooding is caused by the emergence of water originating from underground and is particularly common in karst landscapes. This can emerge from either point or diffuse locations. The occurrence of groundwater flooding is usually very local and unlike flooding from rivers and the sea, does not generally pose a significant risk to life due to the slow rate at which the water level rises. However, groundwater flooding can cause significant damage to property, especially in urban areas and pose further risks to the environment and ground stability. Flood risk relating to groundwater has been screened under Section 5.6 and confirmed that Ballina is not at risk from predicted or historic groundwater flooding.

6 Flood Risk Management Policy

The implementation of the Planning Guidelines throughout the settlement is achieved through the application of the policies and objectives contained within Chapter 10 of the BLAP 2023-2029, these are informed by the CDP policy/objectives and are as follows:

Surface Water Drainage Policies		
It is the policy of the council to:		
IESP 1	Maintain and enhance the existing surface water drainage systems in Ballina and to protect surface and ground water quality in accordance with the Water Framework Directive.	
IESP 2	 a) Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater, including reducing the discharges of pollutants or contaminants to waters in accordance with the River Basin Management Plan for Ireland 2022-2027 (DHPLG) and associated Programme of Measures. b) Require all planning applications to include surface water design calculations to establish the suitability of drainage between the site and the outfall point; where appropriate and feasible. c) EncourageRequire the use of SuDS in public and private developments and within the public realm to minimise and limit the extent of hard surfacing and paving, in order to reduce the potential impact of existing and predicted flooding risks 	
IESP 3	Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater in Ballina in conjunction with the Environmental Protection Agency and in accordance with the River Basin Management Plan for Ireland 2022-2027 and future cycles of this Plan.	

Surface Water Drainage Objectives		
It is an objective	of the Council to:	
IESO 1	Encourage <u>Require</u> the use of SuDS within public and private developments and within the public realm to minimise and limit the extent of hard surfacing and paving, in order to reduce the potential impact of existing and predicted flooding risks.	
IESO 2	Work with Irish Water to separate the discharge of additional surface water to combined (foul and surface water) sewers within the plan area, in order to maximise the capacity of existing collection systems, where possible.	

It is a policy of the Council to:	
IESP 4	Extensions of existing uses or minor development within flood risk areas will be supported, provided they do not: obstruct important flow paths; introduce a number of people into flood risk areas; entail the storage of hazardous substances; have adverse impacts or impede access to a

	watercourse, floodplain or flood protection and management facilities; or increase the risk of flooding elsewhere. Proposals of this nature shall be accompanied by a commensurate assessment of the risks of flooding in accordance with the Planning Systems Flood Risk Management Guidelines 2009.
IESP 5	Manage flood risk in Ballina in conjunction with the OPW and in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and circular PL02/2014 (August 2014).

Flood Risk Management Objectives

It is an objective of the Council to:

it is an objective	
IESO 3	a) Manage flood risk in accordance with the requirements of "The Planning System and Flood Risk Management Guidelines for Planning Authorities", DECLG and OPW (2009) and any revisions thereof and consider the potential impacts of climate change in the application of these guidelines.
	b) Require applications in areas at risk of flooding to be supported by a comprehensive flood risk assessment. All flood risk assessments should have regard to 'The Planning System and Flood Risk Management' (DEHLG and OPW, Nov.2009) as revised by Circular PL 2/2014, national flood hazard mapping, predicted changes in flood events resulting from climate change and the Erriff - Clew Bay – Blacksod – Broadhaven River Basin (UoM 32 – 33) Catchment Flood Risk and Management Plan.
	c) Minimise flood risk arising from pluvial (surface water) flooding in Ballina by promoting the use of natural flood risk management measures including sustainable drainage systems (SuDS), minimising extent of hard surface/paving, and smart solutions such as innovative green infrastructure.
	d) Demonstrate that future development will not result in increased risk of flooding elsewhere, restrict flow paths, where compensatory storage / storm water retention measures shall be provided on site.
	e) Have regard to the most up to date Flood Mapping as presented on the Office of Public Works (OPW) maps.
	f) To applyThe LAP supports the avoidance approach for on-going design, planning and implementation of the Ballina Flood Relief Scheme.
	g) Only minor additions to existing developments and new water compatible developments are permissible within Flood Zone A and less vulnerable water compatible development vulnerable to flooding within a 30m margin from any unmapped watercourse within the plan
	area, or where an avoidance is not possible, require a detailed flood risk assessment to minimise the potential of future flood riskare permissible
	in Flood Zone B in accordance with the requirements provisions of "The Planning System and the Flood Risk Management Guidelines for
	Planning Authorities", DECLG and (DoEHLG/OPW (2009) and any revisions thereof and consider the potential impacts of climate change in the application of these guidelines."
	in the application of these guidennes.

g) To apply the general Development Management guidance provided under Section 7 of the SFRA as well as the specific guidance under Section 8 and Appendix A of the SFRA. The latter guidance relates to the management of risk within individual land use zoning objectives across the different areas of the settlement. <u>Circular PL2/2014 (or any updated/superseding document)</u>. SFRA will be reviewed and updated accordingly.

7 Development Management and Flood Risk

In order to guide both applicants and relevant council staff through the process of planning for and mitigating flood risk, the key features of a range of development scenarios have been identified (relating the flood zone, development vulnerability and presence or absence of defences). For each scenario, a number of considerations relating to the suitability of the development are summarised below.

It should be noted that this section of the SFRA begins from the point that all land zoned for development has passed the Justification Test for Development Plans, and therefore passes Part 1 of the Justification Test for Development Management – which states that the land has in the first instance been zoned accordingly in a development plan (that underwent an SFRA). In addition to the general recommendations in the following sections, Section 7 should be reviewed for specific recommendations for individual settlements, including details of the application of the Justification Test. In areas where there are no formal land use zoning objectives, the Justification Test cannot pass for any sites within Flood Zone A/B. It would be down to a site-specific FRA to confirm (in appropriate detail) the extent of Flood Zone A/B.

In order to determine the appropriate design standards for a development it may be necessary to undertake a site-specific flood risk assessment. This may be a qualitative appraisal of risks, including drainage design. Alternatively, the findings of the CFRAM, or other detailed study, may be drawn upon to inform finished floor levels. In other circumstances a detailed modelling study and flood risk assessment may need to be undertaken. Further details of each of these scenarios, including considerations for the flood risk assessment are provided in the following sections.

7.1 Requirements for a Flood Risk Assessment

Assessment of flood risk is required in support of any planning application where flood risk may be an issue, and this may include sites in Flood Zone C (low probability of flooding) where a watercourse or field drain exists nearby. The level of detail will vary depending on the risks identified and the proposed land use. As a minimum, all proposed development, including that in Flood Zone C, must consider the impact of surface water flood risks on drainage design. In addition, flood risk from sources other than fluvial should be reviewed.

For sites within Flood Zone A or B (high/moderate probability of flooding), a site specific "Stage 2 - Initial FRA" will be required and may need to be developed into a "Stage 3 - Detailed FRA". The extents of Flood Zone A and B are delineated through this SFRA. However, future studies may refine the extents (either to reduce or enlarge them) so a comprehensive review of available data should be undertaken once an FRA has been triggered.

Within the FRA the impacts of climate change and residual risk (including culvert/structure blockage) should be considered and remodelled where necessary, using an appropriate level of detail, in the design of finished floor levels. Further information on the required content of the FRA is provided in the Planning System and Flood Risk Management Guidelines.

Any proposal that is considered acceptable in principle shall demonstrate the use of the sequential approach in terms of the site layout and design and, in satisfying the Justification Test (where required), the proposal will demonstrate that appropriate mitigation and management measures are put in place.

7.2 Drainage Design

All proposed development, whether in Flood Zone A, B or C, must consider the impact of surface water flood risks on drainage design as specified by the surface water management policies in the Greater Dublin Strategic Drainage Study (GDSDS) and this will be considered in the planning process. This may be in the form of a section within the flood risk assessment (for sites in Flood Zone A or B) or part of a surface water management plan.

Areas vulnerable to ponding are indicated on the OPW's PFRA mapping. Particular attention should be given to development in low-lying areas which may act as natural ponds for collection of run-off.

The drainage design should ensure no increase in flood risk to the site, or the downstream catchment. Where possible, and particularly in areas of new development, floor levels should at a minimum be 300mm above adjacent roads and hard standing areas to reduce the consequences of any localised flooding. Where this is not possible, an alternative design appropriate to the location may be prepared.

In addition, for larger sites (i.e. multiple dwellings or commercial units) master planning should ensure that existing flow routes are maintained, through the use of green infrastructure.

7.3 Application for Development in Flood Zones A or B

7.3.1 Minor Developments

Section 5.28 of the Planning Guidelines on Flood Risk Management identifies certain types of development as being 'minor works'. In such cases, the sequential approach cannot be used to locate such development in lower-risk areas and the Justification Test will not apply.

Generally, the approach to deal with flood protection would involve raising the ground floor levels above extreme flood levels. However, in some parts of the plan area, which are already developed, ground floor levels for flood protection could lead to floor levels being much higher than adjacent streets, thus creating a hostile streetscape for pedestrians. This would cause problems for infill development sites if floor levels were required to be significantly higher than those of neighbouring properties. In this regard, for the key sites in the plan area it has been recognised that ground floor levels below predicted high tide levels could be allowed, in limited circumstances, on a site by site basis, for commercial and business developments. However, if this is the case, then these would be required to be flood resistant construction using water resistant materials and electrical fittings places at higher levels. For high risk areas it would also be necessary to impose planning restrictions in these areas. Residential Uses would not be permitted at ground flood levels in high risk zones.

It should be noted that for residential buildings within Flood Zone A or B, bedroom accommodation shall not be permitted at basement or ground floor.

For commercial operations, business continuity must be considered, and steps taken to ensure operability during and recovery after a flood event for both residential and commercial developments. Emergency access must be considered as in many cases flood resilience will not be easily achieved in the existing build environment.

The requirement for providing compensatory storage for minor developments has been reviewed and can generally be relaxed, even where finished floor levels have been raised, and particularly where flood risk is primarily tidal or the development is behind defences. This is because the development concerns land which has previously been developed and would already have limited capacity to mitigate flooding, and would particularly be the case in tidal risk areas. However, a commentary to this effect must be substantiated in the FRA and should be discussed with Mayo County Council prior to submission of a planning application.

7.3.2 Highly vulnerable development in Flood Zone A or B

Development which is highly vulnerable to flooding, as defined in The Planning System and Flood Risk Management, includes (but is not limited to) dwelling houses, hospitals, emergency services and caravan parks.

New development

It is not appropriate for new, highly vulnerable, development to be located in Flood Zones A or B outside the core of a settlement. Such proposals do not pass the Justification Test for Development Plans. Instead, a less vulnerable or water compatible use should be considered.

In some cases, land use objectives which include for highly vulnerable uses have been justified in the Development Plan. This includes zonings focused around an urban core which allow for a mix of residential, commercial and other uses. In such cases, a sequential approach to land use within the site must be taken and will consider the presence or absence of defences, land raising and provision of compensatory storage, safe access and egress in a flood and the impact on the wider development area.

Existing developed areas

The Planning Circular (PL02/2014) states that "notwithstanding the need for future development to avoid areas at risk of flooding, it is recognised that the existing urban structure of the country contains many well established cities and urban centres which will continue to be at risk of flooding. In addition, development plans have identified various strategically important urban centres ... whose continued consolidation, growth, development or generation, including for residential use, is being encouraged to bring about compact and sustainable growth."

In cases where specific development proposals have passed the Justification Test for Development Plans, the outline requirements for a flood risk assessment and flood management measures are detailed in this SFRA in the following sections and the site specific assessments in Section 8, which also detail where such development has been justified. Of prime importance is the requirement to manage risk to the development site and not to increase flood risk elsewhere. It should also be noted that for residential buildings within Flood Zone A or B, bedroom accommodation shall not be permitted at basement or ground floor.

7.3.3 Less vulnerable development in Flood Zone A or B

This section applies to less vulnerable development in Flood Zone A which has passed the Justification Test for development plans, and less vulnerable development in Flood Zone B, where this form of development is appropriate, and the Justification Test is not required. Development which is less vulnerable to flooding, as defined in The Planning Guidelines, includes (but is not limited to) retail, leisure and warehousing and buildings used for agriculture and forestry (see Table 3-3 for further information). This category includes less vulnerable development in all forms, including refurbishment or infill development, and new development both in defended and undefended situations.

The design and assessment of less vulnerable development should begin with 1% AEP fluvial or 0.5% tidal events (depending on dominant flood source) as standard, with climate change and a suitable freeboard included in the setting of finished floor levels. The presence or absence of flood defences informs the level of flood mitigation recommended for less vulnerable developments in areas at risk of flooding. In contrast with highly vulnerable development, there is greater scope for the developer of less vulnerable uses to accept flood risks and build to a lower standard of protection, which is still high enough to manage risks for the development in question. However, any deviation from the design standard of 1%/0.5% AEP, plus climate change, plus freeboard, needs to be fully justified within the FRA and show an appropriate response to the flood risk present and to be agreed with Mayo County Council engineers and planners. However, in County Mayo there are limited locations where formal (non-agricultural) flood defences are present.

7.4 Development Proposals in Flood Zone C

Where a site is within Flood Zone C, but adjoining or in close proximity to Flood Zone A or B there could be a risk of flooding associated with factors such as future scenarios (climate change) or in the event of failure of a defence, blocking of a bridge or culvert. Risk from sources other than fluvial must also be addressed for all development in Flood Zone C. As a minimum in such a scenario, a flood risk assessment should be undertaken which will screen out possible indirect sources of flood risk and where they cannot be screened out, it should present mitigation measures. The most likely mitigation measure will involve setting finished floor levels to a height that is above the 1 in 100-year fluvial flood level, with an allowance for climate change and freeboard, or to ensure a step up from road level to prevent surface water ingress. Design elements such as channel maintenance or trash screens may also be required. Evacuation routes in the event of inundation of surrounding land should also be detailed.

The impacts of climate change should be considered for all proposed developments. A development which is currently in Flood Zone C may be shown to be at risk when 0.5m is added to the extreme (1 in 200 year) tide. Details of the approach to incorporating climate change impacts into the assessment and design are provided in Section 7.6.

7.5 Key points for FRA for all types of developments

- Finished floor levels to be set above the 1% AEP fluvial (0.5% AEP tide) level, with an allowance for climate change plus a freeboard of at least 300mm. The freeboard allowance should be assessed, and the choice justified.
- Flow paths through the site and areas of surface water storage should be managed to maintain their function and without causing increased flood risk elsewhere.
- Compensatory storage is to be provided to balance floodplain loss as a result of raising ground levels within Flood Zone A. The storage should be provided within the flood cell and on a level for level basis up to the 1% level.

- In a defended site, compensatory storage is not required, but the impact of removing the net reduction in floodplain storage should be assessed, and any impacts to existing development mitigated for the 0.1% event or a breach of these defences.
- A site is considered to be defended if the standard of protection is 1% AEP, within which a freeboard of at least 300mm is included. The FFL of the proposed development needs to take into account the impacts of climate change and other residual risks, including the 0.1% event, unless this has also been incorporated into the defence design. This may be assessed through breach analysis, overtopping analysis or projection of levels from the channel inland.
- For less vulnerable development, it may be that a finished floor level as low as the 1% AEP level could be adopted, provided the risks of climate change are included in the development through adaptable designs or resilience measures. This approach should reflect emergency planning and business continuity to be provided within the development. It may reflect the design life of the development, the proposed use, the vulnerability of items to be kept in the premises, the occupants and users, emergency plan and inclusion of flood resilience and recovery measures.

7.6 Incorporating Climate Change into Development Design

In all developments, climate change should be considered when assessing flood risk and in particular residual flood risk. Climate change may result in increased flood extents and therefore caution should be taken when zoning lands in transitional areas (i.e. on the edge of the floodplain). Consideration of climate change is particularly important where flood alleviation measures are proposed, as the design standard of the proposal may reduce significantly in future years due to increased rainfall, river flows and sea levels

The 'Planning System and Flood Risk Management' recommends that a precautionary approach to climate change is adopted due to the level of uncertainty involved in the potential effects. A significant amount of research into climate change has been undertaken on both a national and international front, and updates are ongoing.

Advice on the expected impacts of climate change and the allowances to be provided for future flood risk management in Ireland is given in the OPW Climate Change Sectoral Adaptation Plan. Two climate change scenarios are considered; these are the Mid-Range Future Scenario (MRFS) and the High-End Future Scenario (HEFS). The MRFS is intended to represent a "likely" future scenario based on the wide range of future predictions available. The HEFS represents a more "extreme" future scenario at the upper boundaries of future projections. Based on these two scenarios the OPW recommended allowances for climate change are given in the table below. These climate change allowances are particularly important at the development management stage of planning and will ensure that proposed development is designed and constructed to take into account best current knowledge.

Table 7-1: Allowances for Future Scenarios (100-year Time Horizon)

Criteria	MRFS	HEFS
Extreme Rainfall Depths	+20%	+30%
Flood Flows	+20%	+30%
Mean Sea Level Rise	+500mm	+1000mm
Land Movement	-0.5mm / year*	-0.5mm / year*
Urbanisation	No General Allowance - Review on Case by Case Basis	No General Allowance - Review on Case by Case Basis
Forestation	-1/6 Tp**	-1/3 Tp**+10% SPR***

Notes:

* Applicable to the southern part of the country only (Dublin - Galway and south of this)

** Reduce the time to peak (Tp) by a third; this allows for potential accelerated runoff that may arise as a result of drainage of afforested land

*** Add 10% to the Standard Percentage Runoff (SPR) rate; this allows for increased runoff rates that may arise following felling of forestry

Through the CFRAM Studies, both MRFS and HEFS model runs have been completed on all study watercourses, providing flood extent and depth maps. This information can be used to support flood risk assessments where the current CFRAM scenario has been deemed appropriate to the location.

For watercourses that are not part of the CFRAM programme, fluvial flood extents can be qualitatively assessed by using the Flood Zone B outline as a surrogate for 'Flood Zone A with allowance for the possible impacts of climate change', as suggested in the 'Planning System and Flood Risk Management'. Quantitative assessment of risks may require an additional model run to fully understand risks.

For most development, including residential, nursing homes, shops and offices, the medium-range future scenario (20% increase in flows) is an appropriate consideration. This should be applied in all areas that are at risk of flooding (i.e. within Flood Zone A and B) and should be considered for sites which are in Flood Zone C but are adjacent to Flood Zone A or B. This is because land which is currently not at risk may become vulnerable to flooding when climate change is taken into account.

Where the risk associated with inundation of a development is low and the design life of the development is short (typically less than 30 years) the allowance provided for climate change may be less than the 20% / 0.5m level. However, the reasoning and impacts of such an approach should be provided in the site-specific FRA.

Conversely, there may be development which requires a higher-level response to climate change. This could include major facilities which are extremely difficult to relocate, such as hospitals, airports, Seveso sites or power stations, and those which represent a high-economic and long-term investment within the scale of development across the county. In such situations it would be reasonable to expect the high-end future scenario (30% increase in flow) to be investigated in the site-specific FRA and used as the design standard.

In general, climate change will be accounted for the setting of finished floor levels to a height which includes an allowance for climate change. However, climate change may

also reveal additional flow paths which need to be protected or give rise to flows which exceed culvert capacity or overtop defences. These outcomes will need to be specifically investigated for each site, and an appropriate response provided.

Further consideration to the potential future impacts of climate change is given for each settlement in Section 8.

7.7 Flood Mitigation Measures at Site Design

For any development proposal in an area at moderate or high risk of flooding that is considered acceptable in principle (i.e. has passed the Plan Making Justification Test), the site specific FRA must demonstrate that appropriate mitigation measures can be put in place and that residual risks can be managed to acceptable levels. This may include the use of flood-resistant construction measures that are aimed at preventing water from entering a building and that mitigate the damage floodwater causes to buildings. Alternatively, designs for flood resilient construction may be adopted where it can be demonstrated that entry of floodwater into buildings is preferable to limit damage caused by floodwater and allow relatively quick recovery.

Various mitigation measures are outlined below and further detail on flood resilience and flood resistance are included in the Technical Appendices of the Planning Guidelines, The Planning System and Flood Risk Management.

7.7.1 Site Layout and Design

To address flood risk in the design of new development, a risk-based approach should be adopted to locate more vulnerable land use to higher ground while water compatible development i.e. car parking (with appropriate flood management plan) and recreational space can be located in higher flood risk areas.

The site layout should identify and protect land required for current and future flood risk management. Waterside areas or areas along known flow routes can be used for recreation, amenity and environmental purposes to allow preservation of flow routes and flood storage, while at the same time providing valuable social and environmental benefits.

7.7.2 Ground Levels, Floor Levels and Building Use

Modifying ground levels to raise land above the design flood level is a very effective way of reducing flood risk to the site. However, in most areas of fluvial flood risk, conveyance or flood storage would be reduced locally and could increase flood risk off site. There are a number of criteria which must all be met before this is considered a valid approach:

- Development at the site must have been justified through this SFRA based on the existing (unmodified) ground levels.
- The FRA should establish the function provided by the floodplain. Where conveyance is a prime function then a hydraulic model will be required to show the impact of its alteration.
- The land being given over to storage must be land which does not flood in the 1% AEP fluvial event (i.e. Flood Zone B or C).
- Compensatory storage should be provided on a level for level basis to balance the total area that will be lost through infilling where the floodplain provides static storage.
- The provision of the compensatory storage should be in close proximity to the area that storage is being lost from (i.e. within the same flood cell).
- The land proposed to provide the compensatory storage area must be within the ownership / control of the developer.

- The compensatory storage area should be constructed before land is raised to facilitate development.
- Compensatory storage is generally not required for loss of floodplain in locations behind defences.

In some sites it is possible that ground levels can be re-landscaped to provide a sufficiently large development footprint. However, it is likely that in other potential development locations there is insufficient land available to fully compensate for the loss of floodplain. In such cases it will be necessary to reconsider the layout or reduce the scale of development or propose an alternative and less vulnerable type of development. In other cases, it is possible that the lack of availability of suitable areas of compensatory storage mean the target site cannot be developed and should remain open space.

Raising finished floor levels within a development is an effective way of avoiding damage to the interior of buildings (i.e. furniture and fittings) in times of flood. Alternatively, assigning a water compatible use (i.e. garage / car parking) or less vulnerable use to the ground floor level, along with suitable flood resilient construction, is an effective way of raising vulnerable living space above design flood levels. It can however have an impact on the streetscape. Safe access and egress is a critical consideration in allocating ground floor uses.

Depending on the scale of residual risk, resilient and resistance measures may be an appropriate response, but this will mostly apply to less vulnerable development.

7.7.3 Raised Defences

Construction of raised defences (i.e. flood walls and embankments) has traditionally been the response to flood risk. However, this is not a preferred option on an ad-hoc basis where the defences to protect the development are not part of a strategically led flood relief scheme. Where a defence scheme is proposed as the means of providing flood defence, the impact of the scheme on flood risk up and downstream must be assessed and appropriate compensatory storage must be provided.

7.7.4 Emergency Flood Response Plan

In some instances, and only when all parts both the Plan Making and Development Management Justification Tests have been passed, it may be necessary for an emergency flood response plan to be prepared to support other flood management measures within the context of a less vulnerable or water compatible development. An emergency response plan may be required to trigger the operation of demountable flood defences to a less vulnerable development, evacuation of a car park or closure of a business or retail premises.

The emergency plan will need to detail triggers for activation, including receipt of a timely flood warning, a staged response and to set out the management and operational roles and responsibilities. The plan will also need to set out arrangements for access and egress, both for pedestrians, vehicles and emergency services. The details of the plan should be based on an appropriately detailed assessment of flood risk, including speed of onset of flooding, depths and duration of inundation.

However, just because it is possible to prepare an emergency plan does not mean this is advisable or appropriate for the nature and vulnerability of development.

7.7.5 Nature based solutions / Green Infrastructure / SUDS

Measures can be taken that aim to retain water on the landscape during periods of high rainfall and flood by mimicking the functioning of a natural landscape, thereby reducing the magnitude of flood events and providing complementary ecosystem services. In general, nature-based measures aim to:

- Reduce the rate of runoff during periods of high rainfall;
- Provide flood storage in upper catchment areas; and
- Use natural materials and "soft" engineering techniques to manage flooding in place of "hard" engineering in river corridors.

Nature-based measures to control flooding typically focus on the use of porous surfaces in developments (Sustainable Urban Drainage Systems or SUDS), planting of native vegetation communities/assemblages that are tolerant of both wet and dry conditions and reversing the impacts of over-engineered river corridors (river restoration) to reduce the peak of flood events by mimicking the function of a natural catchment landscape. In addition to providing flood relief benefits, nature-based solutions can provide an array of ecosystem services including silt and pollution control for runoff entering the river system, improved riparian and in-river habitats, localised temperature reduction during periods of extreme heat, reduced maintenance requirements in engineered systems, groundwater recharge, and carbon sequestration.

These measures can be implemented across an array of scales, for instance across a catchment as part of a wider flood relief scheme, or on a site-specific basis as part of a landscaping or green infrastructure plan. Nature-based solutions can provide flood mitigation benefits and ecosystem services across all scales if given adequate planning, and should be considered during the site layout and design stages of a development. The Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document (2022) provides guidance in making appropriate planning and design decisions to incorporate nature based solutions and climate change adaptation to urban spatial planning.

The drainage design shall ensure no increase in flood risk to the site, or the downstream catchment. Reference should be made to the MCDP and BLAP for further policy and objectives. Considerable detail on the process and design of SuDS is also provided in C753², the Dublin SuDS Manual and the Greater Dublin Strategic Drainage Study.

7.7.6 Green Corridor

It is recommended that, where possible, and particularly where there is greenfield land adjacent to the river, a 'green corridor', is retained on all rivers and streams. This will have a number of benefits, including:

- Retention of all, or some, of the natural floodplain;
- Potential opportunities for amenity, including riverside walks and public open spaces;
- Maintenance of the connectivity between the river and its floodplain, encouraging the development of a full range of habitats;
- Natural attenuation of flows will help ensure no increase in flood risk downstream;
- Allows access to the river for maintenance works;
- Retention of clearly demarcated areas where development is not appropriate on flood risk grounds, and in accordance with the Planning System and Flood Risk Management.

The width of this corridor should be determined by the available land, and topographically constraints, such as raised land and flood defences, but would ideally span the fully width of the floodplain (i.e. all of Flood Zone A).

8 Settlement Zoning Review

The purpose of land use zoning objectives is to indicate to property owners and members of the public the types of development the Planning Authority considers most appropriate in each land use category. Zoning is designed to reduce conflicting uses within areas, to protect resources and, in association with phasing, to ensure that land suitable for development is used to the best advantage of the community as a whole.

This section of the SFRA will:

- Outline the strategic approach to flood risk management.
- Consider the land use zoning objectives utilised within Ballina and assess their potential vulnerability to flooding.
- Based on the associated vulnerability of the particular use, a clarification on the requirement of the application of the Justification Test is provided.
- The consideration of the specific land use zoning objectives and flood risk will be presented for the settlements. Comment will be provided on the use of the sequential approach and justification test. Conclusions will be drawn on how flood risk is proposed to be managed in the settlement.

8.1 A Strategic Approach to Flood Risk Management

A strategic approach to the management of flood risk is important in Ballina as the risks are varied, with scales of risk and vulnerability varying across the settlement.

Following the Planning Guidelines, development should always be located in areas of lowest flood risk first, and only when it has been established that there are no suitable alternative options should development (of the lowest vulnerability) proceed. Consideration may then be given to factors which moderate risks, such as defences, and finally consideration of suitable flood risk mitigation and site management measures is necessary.

It is important to note that whilst it may be technically feasible to mitigate or manage flood risk at site level, strategically it may not be a sustainable approach.

A summary of flood risks associated with each of the zoning objectives has been provided in the following settlement reviews. The Flood Risk commentary indicates whether a certain land zoning, in Flood Zone A or B, will need to have the Plan Making Justification Test (JT) applied and passed.

When carrying out a site-specific FRA, or when planning applications are being considered, it is important to remember that not all uses will be appropriate on flood risk grounds, hence the need to work through the Justification Test for Development Management on a site by site basis and with reference to Table 8-1. For example, a Town Centre zoning objective can include for an integrated mix of residential, commercial, community and social uses which have varying vulnerabilities and would not be equally permissible within Flood Zone A and B. <u>Overview maps of the Ballina Land Use Zoning with Flood maps can be seen in Figure 8-1 and Appendix B.</u>

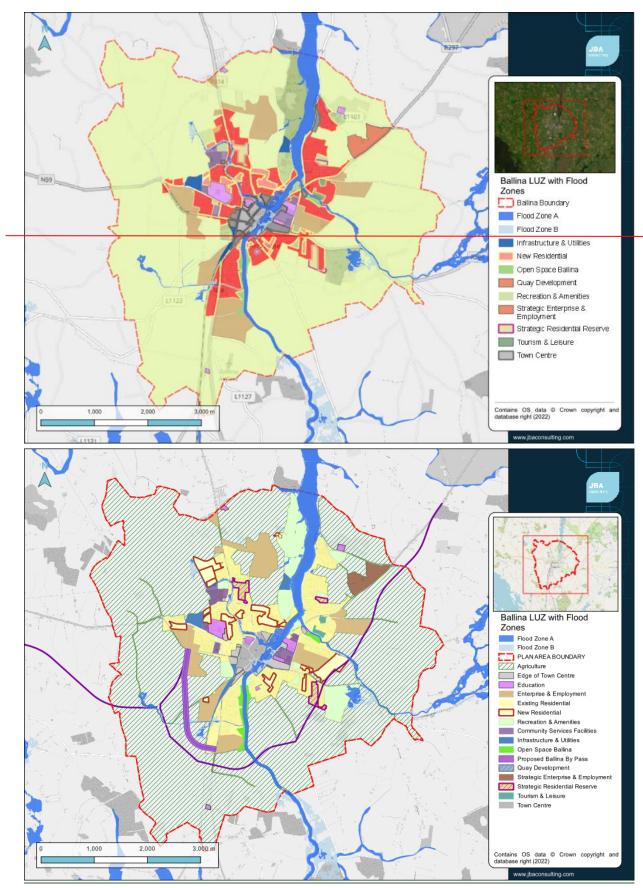


Figure 8-1 Ballina LUZ overview

8.2 Transport Infrastructure

A review of transport infrastructure routes detailed in the Local Area Plan has also been carried out as part of this SFRA. Under the Planning Guidelines and Flood Risk Management, local transport infrastructure is classed as less vulnerable whilst essential infrastructure, such as primary transport, is highly vulnerable. A map of proposed travel infrastructure in Ballina can be seen in the figure over page.

There are a number of areas where proposed transport infrastructure crosses, or is within, Flood Zone A and / or B in Ballina, some of which are within Flood Zone C and some cross, or are wholly within Flood Zone A and or B. Local infrastructure routes are considered to be less vulnerable and are appropriate in Flood Zone B but a flood risk assessment is required to support the detailed design. Where the routes pass through Flood Zone A, careful consideration of the risks is required to ensure alternative routes within Flood Zone B or C are not available. A detailed flood risk assessment will also be required to support all route selection and detailed design.

The three proposed active travel bridges (circled in red, Figure 8-2) proposed on the Moy in Ballina are within Flood Zone A. As far as the Justification Test applies, there are no alternative routes which are wholly within Flood Zone C or B. The detailed design of the preferred route should include a flood risk assessment and note the requirement for Section 50 consent where a bridge is required to cross the Moy.

The proposed western bypass scheme lies predominantly within Flood Zone C with some sections of it passing through Flood Zone A and B and across the Moy and some of its tributaries. As far as the Justification Test applies, there are no alternative routes which are wholly within Flood Zone C. The assessment of road alignment options and detailed design of the preferred route should include a flood risk assessment and note the requirement for Section 50 consent where bridges or culverts are required.

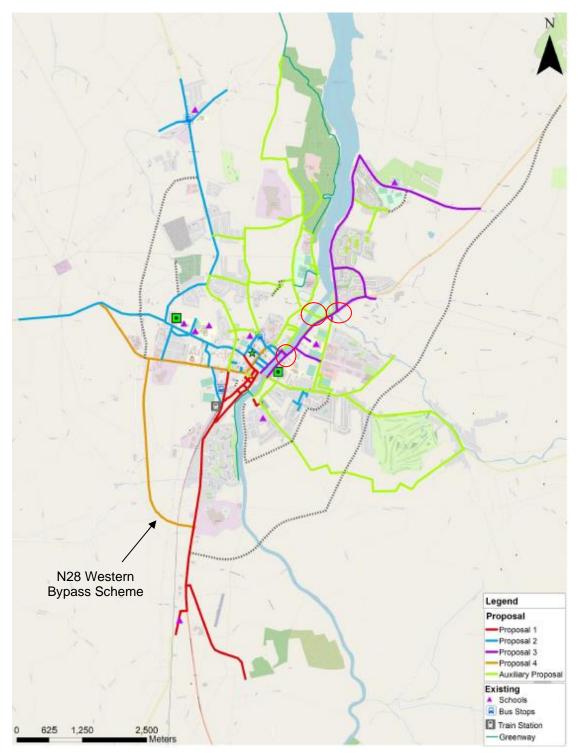


Figure 8-2 Proposed Active Travel Network of Ballina

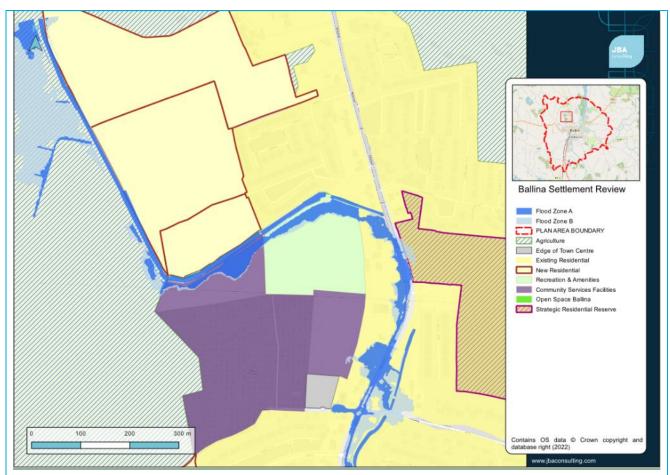
Zoning Objective	Indicative Primary Vulnerability	Flood Risk Commentary
Agriculture	Water compatible / less vulnerable	JT cannot pass for less vulnerable buildings in Flood Zone A, avoidance principle must be used.
Strategic Enterprise & Employment	Less / highly vulnerable	For highly vulnerable development in Flood Zone A or B. For less vulnerable development in Flood Zone A.
Enterprise & Employment	Less / highly vulnerable	For highly vulnerable development in Flood Zone A or B. For less vulnerable development in Flood Zone A.
Community Services Facilities	Less / highly vulnerable	Consideration to be given to flood risks and sequential use of land to ensure highly vulnerable uses are located within areas at lowest risk of flooding.
Existing Residential	Highly Vulnerable	JT required for within Flood Zone A and B.
New Residential	Highly Vulnerable	JT required for within Flood Zone A and B.
Industry	Less vulnerable	Appropriate use in Flood Zone B, but JT will be needed in Flood Zone A.
Open Space/Recreation & Amenity	Water compatible / Less vulnerable	For water compatible JT not needed. Land use appropriate and should be retained. For less vulnerable development in Flood Zone A.
Infrastructure & Utility	Less / highly vulnerable	For highly vulnerable development in Flood Zone A or B. For less vulnerable development in Flood Zone A.
Transport Infrastructure	Less / Highly Vulnerable	For highly vulnerable development in Flood Zone A or B. For less vulnerable development in Flood Zone A.
Town Centre\ Edge of Town Centre	Less / Highly Vulnerable	For highly vulnerable development in Flood Zone A or B. For less vulnerable development in Flood Zone A.
Tourism & Leisure	Less / Highly Vulnerable	For highly vulnerable development in Flood Zone A or B. For less vulnerable development in Flood Zone A.
Quay Development	Water compatible	JT not needed for water compatible.

Table 8-1: Zoning Objective Vulnerability

The following sections review the land use zoning objectives for each settlement within the plan and provide a comprehensive summary of flood risk and justification where necessary.

8.3 Kilmoremoy

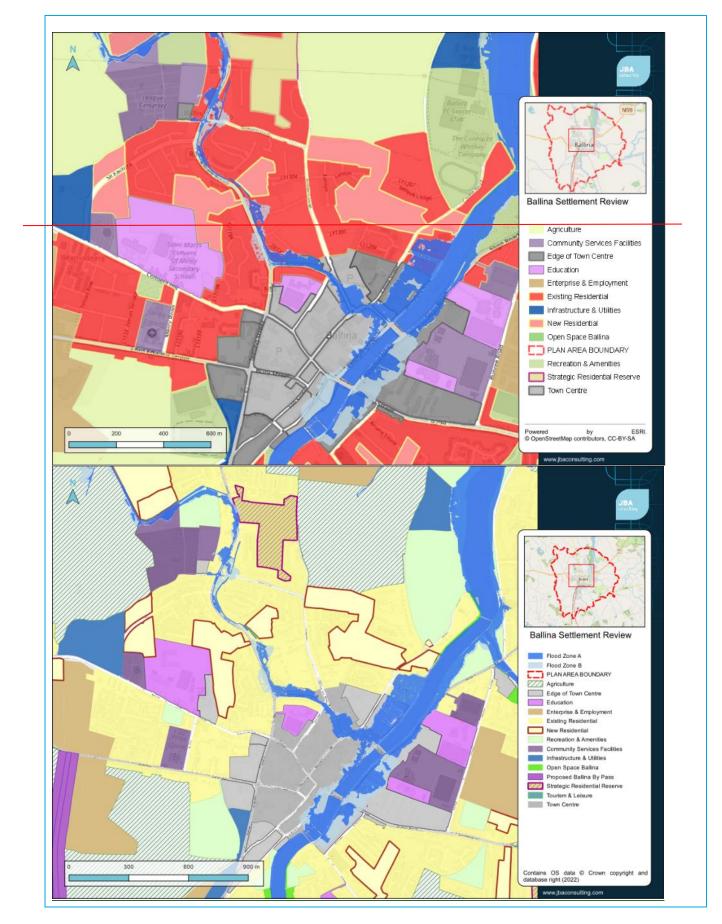




Flood Zone Data	CFRAM (verified by a site visit)
Flood Relief Scheme	Proposed measures are included along the Knockanelo and will require that MCC allow for consideration of these in the LAP.
Historic Flooding	No historic flooding reported in this area.
Comment	The Knockanelo flows in an easterly direction before turning south towards the Moy. Risk here is low to moderate and limited to the northern part of a cemetery, Existing Residential, Strategic Residential Reserve and Agriculture.
Climate Change	Low sensitivity to climate change, little difference between 1 in 1000 year current and high end future scenario.
Conclusion	Most of the risk is limited to existing developments and since the area is not within or adjacent to the core town centre the Justification Test cannot pass. On this basis flood risk must be managed in accordance with the sequential approach and Section 5.28 of the Planning Guidelines. As such the following is recommended:
	 For New Residential lands any future development of the land should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: The sequential approach must be applied, and highly vulnerable elements of the site must be located in Flood Zone C; FRA should address climate change scenarios in relation to operational levels and potential mitigation measures;

<u>Any development shall also be required to be built in</u> accordance with MCC SuDS Policy.
 For Existing Residential the following management actions apply: Development limited to extensions, renovations and change of use. Infill residential development and demolition and reconstruction
 can only take place in Flood Zone C. There are to be no bedrooms on the ground floor when extending
existing residential property in Flood Zone A/B.
 Any future development should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA.
For Community Services & Facilities any future expansion of the cemetery should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following:
 The sequential approach should be applied and built development should preferably be located in Flood Zone C; Flood Zone A would principally be suitable for water compatible
use only;
 Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and;
 Any development shall also be required to be built in accordance with MCC SuDS Policy.
For the New Residential lands, since these are undeveloped it is a suitable opportunity to apply nature based surface water management in line with IESO 3 (c) and the DHLGH Best Practise Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas.
Elsewhere in the area, risk can be managed in line with MCC approved policy and the guidance provided within Section 7 of this SFRA.

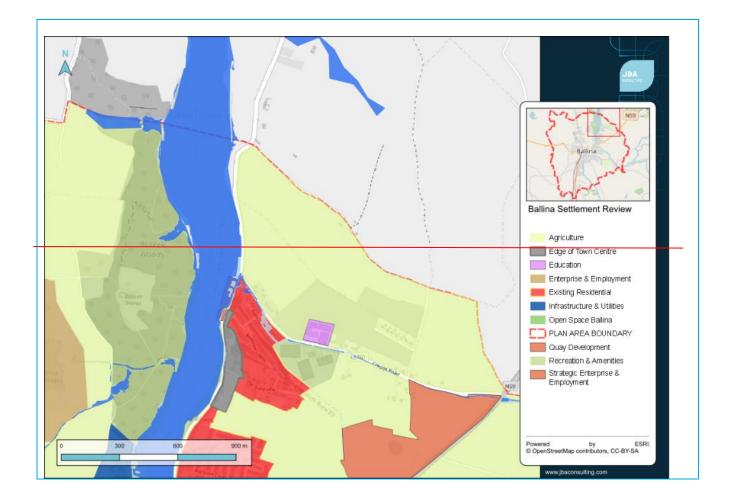
8.4 Ballina Town Centre

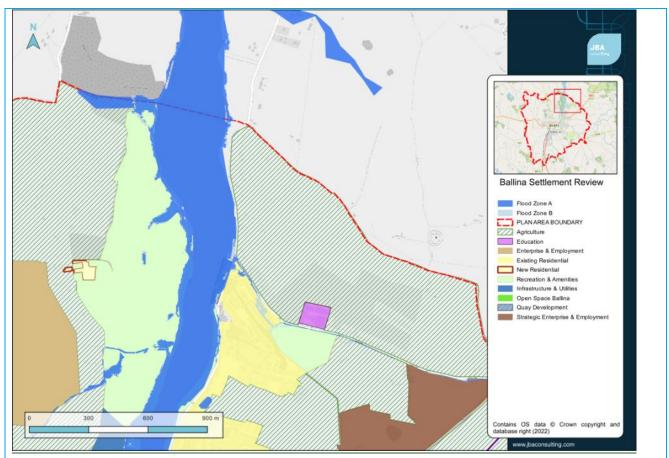


	Separately.
Flood Zone Data	CFRAM (verified by a site visit)
Flood Relief Scheme	Proposed measures are included along the River Moy/Knockanelo and will require that MCC allow for consideration of these in the LAP.
Historic Flooding	The town centre of Ballina was reported to have flooded in the past due to the river Moy bursting its banks.
Comment	Much of the risk is limited to existing developments. There is a mix of fluvial and tidal influences in this area on the banks of the Moy downstream of the Salmon Weir bridge. The left bank of the Moy along Bachelor's Walk is at risk of flooding during 10% AEP tidal events. The JT has been applied and passed for the Existing Residential, Town Centre, edge of town centre and community services and facilities. Missing flood extent information from the Bunree Stream but this has been requested from OPW and will be updated if/when made available.
Climate Change	High sensitivity to climate change. Areas on the left and right banks of the Moy upstream of the bridge are susceptible to climate change. Construction on the Ballina FRS is due to begin in 2025 which will either mitigate against the impacts of climate change, or offer adaptability. The impacts of climate change can be reduced further through adaptation strategies such has setting appropriate FFLs and proper management of residual risks.
Conclusion	 Part of the Town Centre and Edge of Town Centre lands are within Flood Zone A/B. The Justification Test has been passed for the Town Centre & Edge of Town Centre on the basis that; Prior to the completion of the FRS, development within Flood Zone A/B is limited to extensions, renovations and change of use. Infill highly vulnerable development and demolition and reconstruction can only take place in Flood Zone C until such a time as the Ballina FRS has been constructed and fully operational. Any future development should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address points listed in Appendix A.1.1 and A.1.2. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning for Community Services & Facilities (see Appendix A.1.3): Any future expansion of the land should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: The sequential approach should be applied and built development should preferably be located in Flood Zone C; Flood Zone A would principally be suitable for playing pitches/water compatible use only; FRA should address climate change scenarios in relation to operational levels and potential mitigation measures; Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Any development shall also be required to be built in accordance with MCC SuDS Policy.
	The Justification Test for Existing Residential (see Appendix A.1.4) is passed on the basis that development is:

 Prior to the completion of the FRS, development within Flood Zone A/B is limited to extensions, renovations and change of use. Infill residential development and demolition and reconstruction can only take place in Flood Zone C until such a time as the Ballina FRS has been constructed and fully operational. There are to be no bedrooms on the ground floor when extending existing residential property in Flood Zone A/B. Any future development should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the points detailed in Part 3 of the JT under Appendix A.1.4.
 Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning for Education (see Appendix A.1.5): Any future construction should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: Only water compatible development should be placed in Flood Zone B; FRA should address climate change scenarios in relation to operational levels and potential mitigation measures; Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Development is constructed in accordance with the site specific FRAs. Any development shall also be required to be built in accordance with MCC SuDS Policy.
For the New Residential lands, since these are undeveloped it is a suitable opportunity to apply nature based surface water management in line with IESO 3 (c) and the DHLGH Best Practise Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas.
Elsewhere in the area, risk can be managed in line with MCC approved policy and the guidance provided within Section 7 of this SFRA.

8.5 Quignamanger



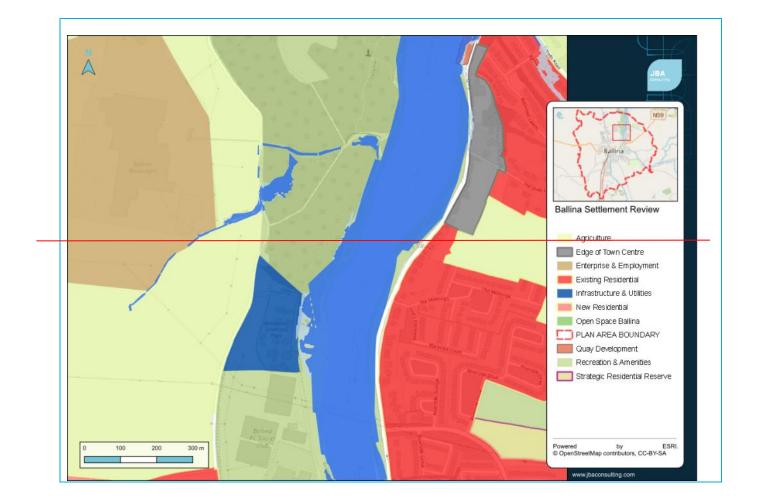


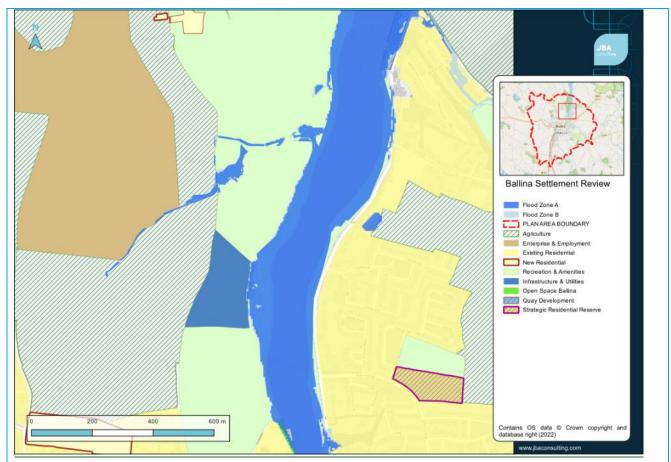
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Flood Zone Data	CFRAM (verified by a site visit)
Flood Relief Scheme	Proposed measures are included along the River Moy at Ballina Quay and another diversion culvert to the north. MCC should allow for consideration of these in the LAP.
Historic Flooding	There has been flooding reported in Quignamanger on the right bank of the Moy.
Comment	There is a risk of flooding where the Quignamanger river meets the Moy. Discharge rates from the Quignamanger river to the Moy are affected by tides and can lead to flooding. There is also risk of flooding within the grounds of Beleek woods.
Climate Change	Sensitive to climate change in the Beleek woods area and coming into the grounds of Beleek Manor.
Conclusion	 The Justification Test has been applied and passed for the Edge of Town Centre lands where there is a minimal overlap with Flood Zone B. Since the Existing Residential and Strategic Enterprise and Employment are not within or adjacent to the town centre, therefore the Justification Test cannot pass. On this basis flood risk must be managed in accordance with the sequential approach and Section 5.28 of the Planning Guidelines. The Justification Test for edge of town centre zoning is passed on the basis that that the points detailed in Part 3 of the JT under
	Appendix A.3.1 are adhered to, key points include:
	 The sequential approach must be applied, and less vulnerable elements of the site should be located in Flood Zone B or

preferably C;
 Highly vulnerable development would only be suitable in Flood Zone C.
 For Existing Residential development must be; Limited to extensions, renovations and change of use. Infill residential development and demolition and reconstruction can only take place in Flood Zone C. There are to be no bedrooms on the ground floor. Any future development should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA.
 For the Strategic Enterprise and Employment lands any future development of the land should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: The sequential approach must be applied, and less vulnerable elements of the site should be located in Flood Zone B or preferably C; Highly vulnerable development would only be suitable in Flood Zone C. FRA should address climate change scenarios in relation to operational levels and potential mitigation measures Any development shall also be required to be built in accordance with MCC SuDS Policy.
Elsewhere in the area, risk can be managed in line with MCC approved policy and the guidance provided within Section 7 of this SFRA.

8.6 Beleek

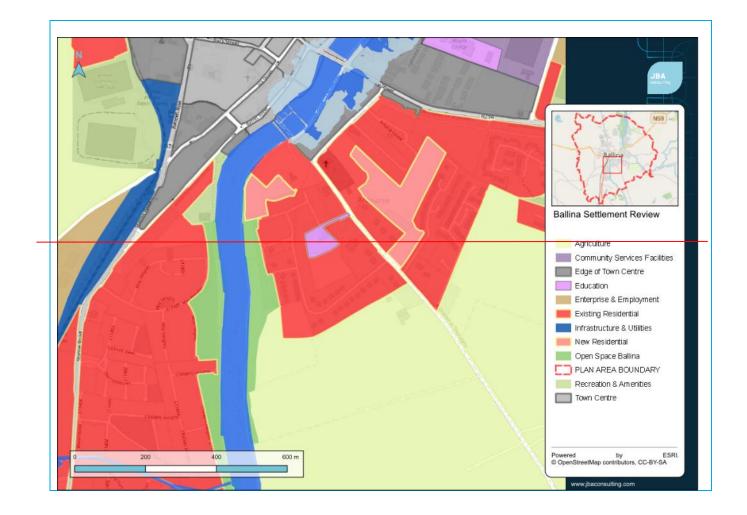


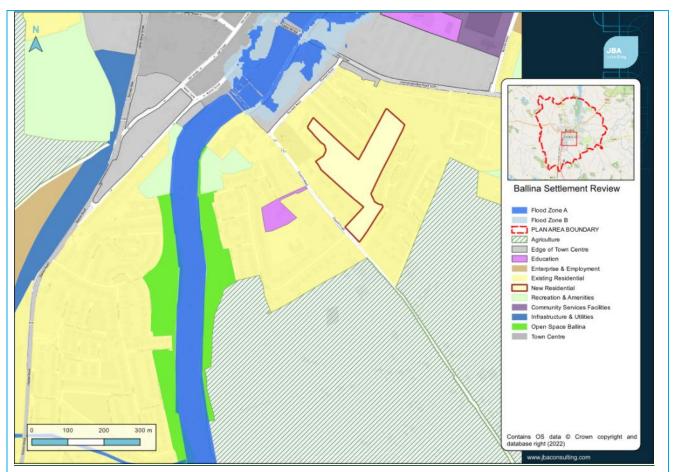


Flood Zone Data	CFRAM (verified by a site visit)
Historic Flooding	No historic flooding reported in this area.
Comment	Risk of flooding is low in existing residential areas and along the banks of the Moy. There is a moderate Fluvial risk in Beleek Woods from the Quignalecka river. Most of the risk is limited to water compatible uses except for an overlap with Existing Residential
Climate Change	Low sensitivity to climate change with moderate sensitivity to climate change at the confluence of the Quignalecka river and the River Moy.
Conclusion	Most of the risk is limited to existing developments and since the area is not within or adjacent to the core town centre the Justification Test cannot pass. On this basis flood risk must be managed in accordance with the sequential approach and Section 5.28 of the Planning Guidelines. As such the following is recommended:
	For the Enterprise and Employment lands any future development of the land should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following:
	 The sequential approach must be applied, and less vulnerable elements of the site should be located in Flood Zone B or preferably C;
	 Highly vulnerable development would only be suitable in Flood Zone C.
	 FRA should address climate change scenarios in relation to operational levels and potential mitigation measures

 Any development shall also be required to be built in accordance with MCC SuDS Policy.
For the Infrastructure & Utilities lands any future development of the land should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following:
 Highly vulnerable elements of the site should be raised/bunded/protected;
 FRA should address climate change scenarios in relation to operational levels and potential mitigation measures;
 Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and;
 Any development shall also be required to be built in accordance with MCC SuDS Policy.
For other sites within the area manage risk in line with approved Policy and the guidance provided within Section 7 of this SFRA.

8.7 Glebe

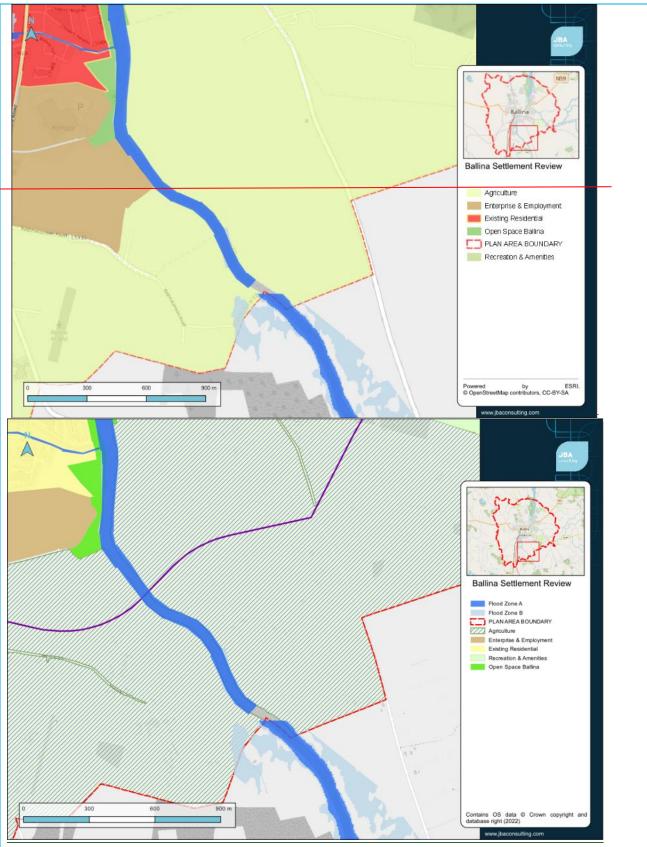




Flood Zone Data	CFRAM (verified by a site visit)
Historic Flooding	No historical reports of flooding in this area.
Comment	Risk in this area is low at this reach of the Moy and tidal influence has stopped upstream at the Salmon Weir bridge. Risk is limited to Open Recreation & Amenity and Existing Residential.
Climate Change	Low sensitivity to climate change in most areas with moderate sensitivity immediately upstream of the Salmon Weir bridge and in the Moy heights area.
Conclusion	The justification test has been passed for Existing Residential under Appendix A.2.1.
	Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that;
	 Development is constructed in accordance with the site specific FRAs.
	 Prior to the completion of the FRS, development within Flood Zone A/B is limited to extensions, renovations and change of use.
	 Infill residential development and demolition and reconstruction can only take place in Flood Zone C until such a time as the Ballina FRS has been constructed and fully operational.
	 There are to be no bedrooms on the ground floor when extending existing residential property in Flood Zone A/B.
	 Any future development should be subject to an FRA which should follow the general guidance provided in Section 7 of the

SFRA and must specifically address the points detailed in Part 3 of the JT under Appendix A.2.1.
For the New Residential lands, since these are undeveloped it is a suitable opportunity to apply nature based surface water management in line with IESO 3 (c) and the DHLGH Best Practise Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas.
Any further development of the lands should be subject to an appropriately detailed FRA which should follow the general guidance provided in Section 7 of the SFRA.



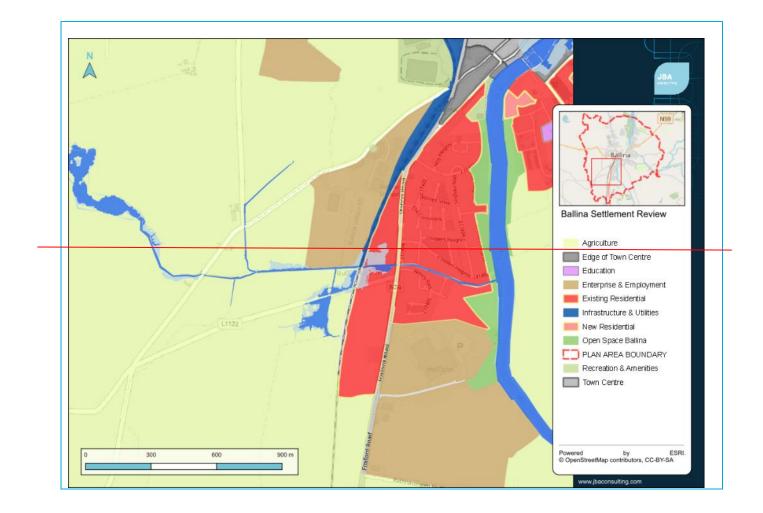


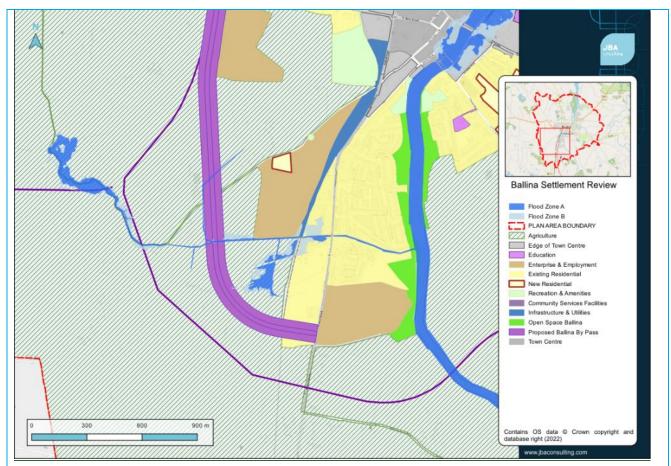
The flood mapping has been produced in accordance with the Planning Guidelines and therefore ignores the impact of flood protection structures. Areas protected by flood defences still carry a residual risk of flooding due

No historical reports of flooding in this area.
Risk is low and located along the banks of the Moy. Risk is limited to Recreation & Amenities, Enterprise and Employment and Agriculture. These are all undeveloped.
Low sensitivity to climate change.
 Most of the risk is limited to existing developments and since the area is not within or adjacent to the core town centre the Justification Test cannot pass. On this basis flood risk must be managed in accordance with the sequential approach and Section 5.28 of the Planning Guidelines. As such the following is recommended: For Enterprise & Employment any future development of the land should be subject to an FRA which should follow the general guidance provided in Section 7of the SFRA and must specifically address the following: The sequential approach should be applied and Highly vulnerable elements of the site should be located in Flood Zone C, or appropriately mitigated; FRA should address climate change scenarios in relation to operational levels and potential mitigation measures; Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Any development shall also be required to be built in accordance with MCC SuDS Policy including consideration of nature based surface water management in line with IESO 3 (c) and the DHLGH Best Practise Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water
-

to overtopping or breach, there may also be no guarantee of maintenance in perpetuity. Areas that benefit from

8.9 Ballina Commons



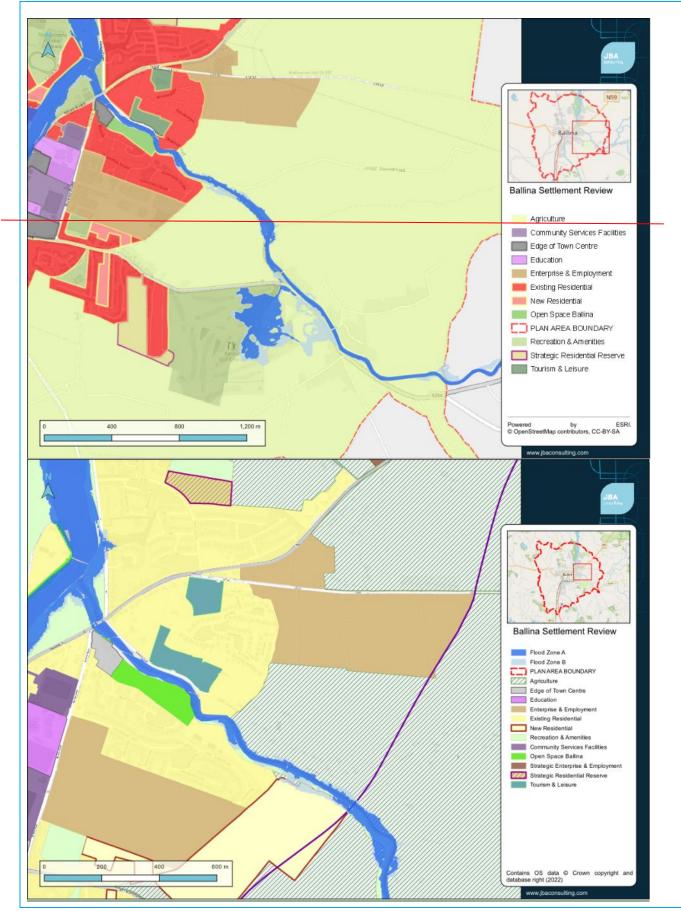


The flood mapping has been produced in accordance with the Planning Guidelines and therefore ignores the impact of flood protection structures. Areas protected by flood defences still carry a residual risk of flooding due to overtopping or breach, there may also be no guarantee of maintenance in perpetuity. Areas that benefit from defences are annotated separately.

•		
Flood Zone Data	CFRAM (verified by a site visit)	
Flood Relief Scheme	Proposed measures are included along the Tullyegan Stream and will require that MCC allow for consideration of these.	
Historic Flooding	No historical reports of flooding in this area.	
Comment	Risk here is related to the Tullyegan River which flows from west to east where it discharges to the Moy. There is moderate risk in Existing Residential and Agriculture. Much of the risk is limited to Agriculture, Existing Residential and Enterprise and Employment.	
Climate Change	There is sensitivity to climate change in some undeveloped areas.	
Conclusion	 There is sensitivity to climate change in some undeveloped areas. Most of the risk is limited to existing developments and since the area is not within or adjacent to the core town centre the Justification Test cannot pass. On this basis flood risk must be managed in accordance with the sequential approach and Section 5.28 of the Planning Guidelines. As such the following is recommended: For existing residential development is managed by the following measures; Development limited to extensions, renovations and change of use. Bedrooms should be located in the upstairs of two-story buildings when extending existing property. Infill residential development and demolition and reconstruction can only take place in Flood Zone C. 	

general guidance provided in Section 7 of the SFRA.	
	general guidance provided in Section 7 of the Srive.
	 For Enterprise & Employment and Infrastructure & any future development of the land should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: The sequential approach should be applied and Highly vulnerable elements of the site should be located in Flood Zone C, or appropriately mitigated; FRA should address climate change scenarios in relation to operational levels and potential mitigation measures; Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Any development shall also be required to be built in accordance with MCC SuDS Policy in line with IESO 3 (c) and the OPW Best Practise Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas.
	For other sites within the area manage risk in line with approved Policy and the guidance provided within Section 7 of this SFRA.

8.10 Abbeyhalfquarter



The flood mapping has been produced in accordance with the Planning Guidelines and therefore ignores the impact of flood protection structures. Areas protected by flood defences still carry a residual risk of flooding due to overtopping or breach, there may also be no guarantee of maintenance in perpetuity. Areas that benefit from defences are annotated separately.

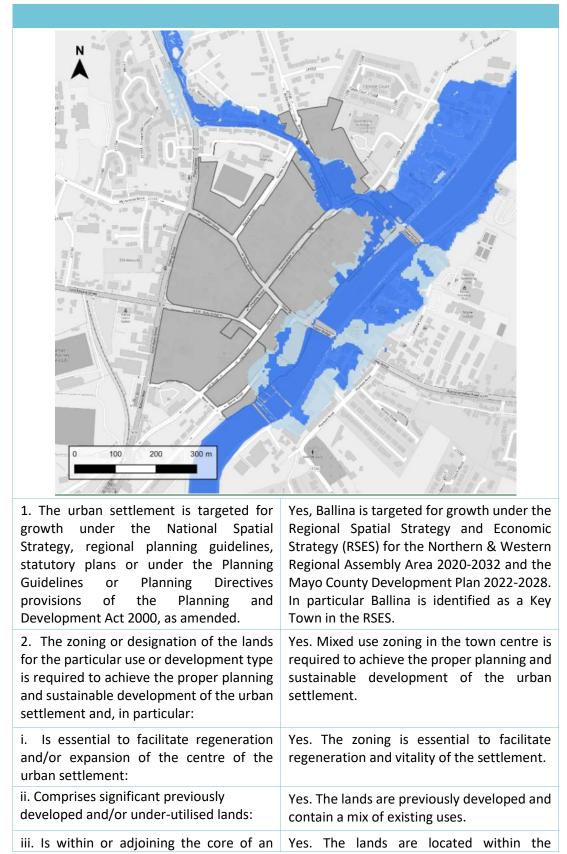
Flood Zone Data	CFRAM (verified by a site visit)	
Flood Relief Scheme	Proposed measures are included along the River Brusna and will require that MCC allow for consideration of these.	
Historic Flooding	No historical reports of flooding in this area.	
Comment	Much of the risk here is at the upper reaches of the Brusna along the left bank. The Ballina golf course and surrounding area is at high risk of flooding. Risk is limited to <u>New Residential</u> , Existing Residential, Agriculture and Recreation & Leisure.	
Climate Change	The Brusna is sensitive to climate change in some areas. Most of the change is within the golf course however there are some areas on the banks of the Brosna that should be avoided.	
Conclusion	 Danks of the Brosha that should be avoided. On the basis that the site is undeveloped and not within or adjacent to the core, the Justification Test cannot be applied or passed for the New Residential zoning located on the periphery of the settlement and within Flood Zone A/B. Any future development of the land should be subject to an FRA which should follow the general quidance provided in Section 7 of the SFRA and must specifically address the following: The sequential approach must be applied, and highly vulnerable elements of the site must be located in Flood Zone C; Lands within Flood Zone A/B should preferentially be used for water compatible development; FRA should address climate change scenarios; Any development shall also be required to be built in accordance with MCC SuDS Policy. The Justification Test has been applied for Existing Residential under Appendix A.4.1. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that; Development is constructed in accordance with the site specific FRAs. Additional development in Flood Zones A/B should be limited to extensions and renovations. Any further development of the lands should be subject to an appropriately detailed FRA which should follow the general guidance provided in Section of the SFRA and must specifically address the following: The sequential approach must be applied, and less vulnerable elements of the site should be located in Flood Zone B or preferably C; FRA should address climate change scenarios in relation to operational levels and potential mitigation measures; Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Any development shall also be required to be built in accordance with MCC SuDS Policy. 	

Appendix A -

A Justification Tests

A.1 Ballina Town Centre

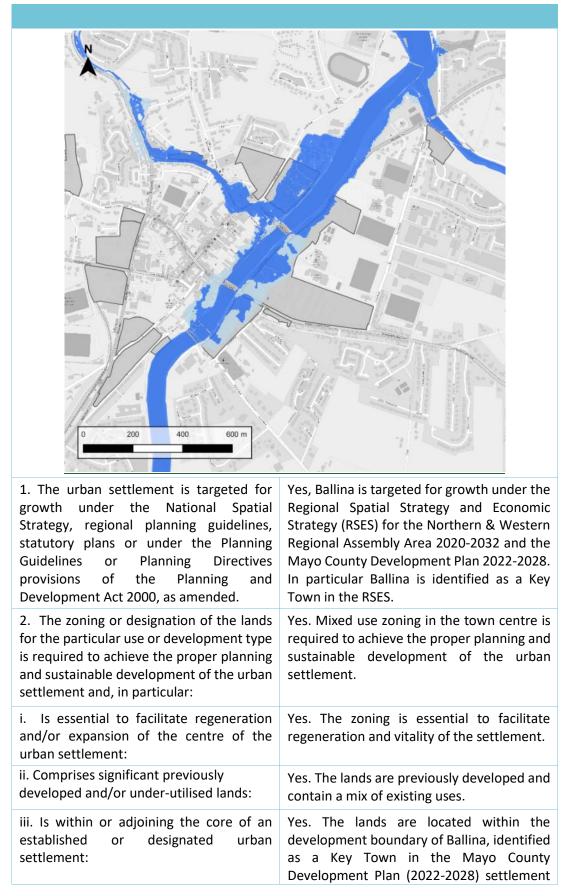
A.1.1 Town Centre



established or designated urban settlement:	development boundary of Ballina, identified as a Key Town in the Mayo County Development Plan (2022-2028) settlement hierarchy
iv. Will be essential in achieving compact and sustainable urban growth;	Yes. The zoning is essential to 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.	The lands are a mix of existing and underdeveloped mixed use lands and it is considered appropriate to retain the zoning within the settlement boundary of Ballina.
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.	 Ballina Town Centre is known to be prone to flooding and is undergoing a Flood Relief Scheme. Parts of the Town Centre are within Flood Zone A/B. Most of the land is under existing development. There are also some areas predicted to experience increased flooding as a result of climate change in 1 in 1000 year events. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that; Within Flood Zone A/B development is limited to extensions, renovations and change of use. Infill highly vulnerable development and demolition and reconstruction can only take place in Flood Zone C. Less vulnerable development is appropriate within Flood Zone B. Any future development should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: The sequential approach should be applied and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B; Infill highly vulnerable development and demolition

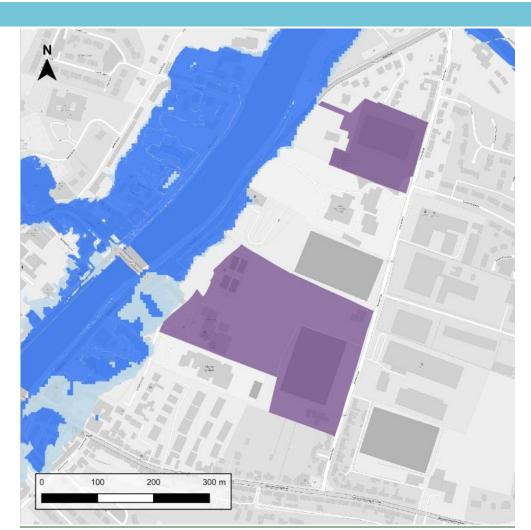
and reconstruction can only take place in Flood Zone C until
such a time as the Ballina FRS has been constructed and is fully operational.
 FRA should address climate change scenarios in relation to FFLs and potential mitigation measures;
 Finished floor levels should be above the 1% AEP level plus climate change and freeboard;
 Bedrooms should be located in the upstairs of two-story buildings when extending existing residential property in Flood Zone A/B;
 Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;
 Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and;
 Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events.
 Any development shall also be required to be built in accordance with MCC SuDS Policy.

A.1.2 Edge of Town Centre



 iv. Will be 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. 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 	hierarchy Yes. The zoning is essential to achieving compact and sustainable urban growth. The lands are a mix of existing and underdeveloped mixed use lands and it is considered appropriate to retain the zoning within the settlement boundary of Ballina. Ballina Town Centre is known to be prone to flooding and is undergoing a Flood Relief Scheme. Parts of the Town Centre are within Flood Zone A/B. Most of the land is under existing development. There are also some areas predicted to experience increased flooding as a result of climate
 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. 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 	compact and sustainable urban growth. The lands are a mix of existing and underdeveloped mixed use lands and it is considered appropriate to retain the zoning within the settlement boundary of Ballina. Ballina Town Centre is known to be prone to flooding and is undergoing a Flood Relief Scheme. Parts of the Town Centre are within Flood Zone A/B. Most of the land is under existing development. There are also some areas predicted to experience
 for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement. 3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which 	underdeveloped mixed use lands and it is considered appropriate to retain the zoning within the settlement boundary of Ballina. Ballina Town Centre is known to be prone to flooding and is undergoing a Flood Relief Scheme. Parts of the Town Centre are within Flood Zone A/B. Most of the land is under existing development. There are also some areas predicted to experience
appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which	to flooding and is undergoing a Flood Relief Scheme. Parts of the Town Centre are within Flood Zone A/B. Most of the land is under existing development. There are also some areas predicted to experience
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	 change in 1 in 1000 year events. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that; Within Flood Zone A/B development is limited to extensions, renovations and change of use. Infill highly vulnerable development and demolition and reconstruction can only take place in Flood Zone C. Less vulnerable development is appropriate within Flood Zone B. Any future development should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: The sequential approach should be applied and highly vulnerable infill and
	 redevelopment shall not be permitted in Flood Zone A or B; Infill highly vulnerable development and demolition and reconstruction can only take place in Flood Zone C until

 has been constructed and fully operational. FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; Finished floor levels should be above the 1% AEP level plus climate change and freeboard; Bedrooms should be located in the upstairs of two-story buildings when extending existing residential property in Flood Zone A/B;
 Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;
 Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and;
 Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events.
 Any development shall also be required to be built in accordance with MCC SuDS Policy.

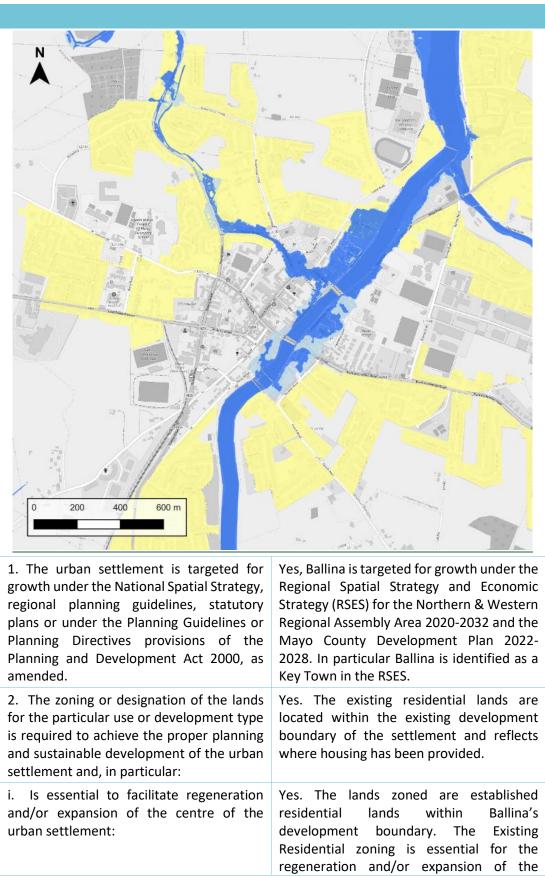


A.1.3 Community Services & Facilities

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.	Yes, Ballina is targeted for growth under the Regional Spatial Strategy and Economic Strategy (RSES) for the Northern & Western Regional Assembly Area 2020-2032 and the Mayo County Development Plan 2022-2028. In particular Ballina is identified as a Key Town in the 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:	Yes. The zoning of these lands for Community Services Facilities is required to achieve the proper planning and sustainable development of Ballina.
i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	Yes. Its zoning for these uses is essential to facilitate the continued regeneration of Ballina.
ii. Comprises significant previously developed and/or under-utilised lands:	Yes. The lands are existing Community Services/Facilities lands within the development boundary of Ballina.

iii. Is within or adjoining the core of an established or designated urban settlement:	Yes. The lands are located within the development boundary of Ballina, identified as a Key Town in the Mayo County Development Plan (2022-2028) settlement hierarchy
iv. Will be essential in achieving compact and sustainable urban growth;	Yes. The lands for the proposed used are 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.	Yes. The lands are existing Community Services Facilities lands considered appropriate to retain the zoning within the development boundary of Ballina.
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	 There is limited overlap with Flood Zone B and the existing Community Facility lands. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning for the site. Any future expansion of the site should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: The sequential approach should be applied and extensions to the school building should be located in Flood Zone C; Flood Zone A/B would principally be suitable for playing pitches/water compatible use only; FRA should address climate change scenarios in relation to operational levels and potential mitigation measures; Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Any development shall also be required to be built in accordance with MCC SuDS Policy.

A.1.4 Existing Residential



	centre of the urban settlement. The Existing Residential zoning designation does not facilitate new development in areas subject to flooding. Any proposed development within the Existing Residential zoning will be subject to a Flood Risk Assessment as required by The Planning System and Flood Risk Management Guidelines.
	The type of developments envisaged to occur would include small scale developments such as domestic extensions which would not be permitted in areas subject to flooding and therefore would not increase risk of flooding. Change of use to a more vulnerable class would not be permitted. (Table 3.1 Classification of vulnerability of different types of development) The Planning System and Flood Risk Management Guidelines refers.
ii. Comprises significant previously developed and/or under-utilised lands:	Yes. The lands comprise of under-utilised lands and existing residential development.
iii. Is within or adjoining the core of an established or designated urban settlement:	Yes. The lands are located within the development boundary of Ballina, identified as a Key Town in the Mayo County Development Plan (2022-2028) settlement hierarchy.
iv. Will be essential in achieving compact and sustainable urban growth;	Yes. Retention of existing residential lands will maintain a strong and cohesive settlement. Any growth in this zoning will be limited to uses which do not increase flood risk.
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 zoning classification 'existing residential' is a unique category of zoning which reflects existing rather than proposed use. There are no alternative zoning categories on lands in lower risk of flooding within or adjoining the core that fulfils the same role as 'existing residential'.
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	 There is a significant overlap with Existing Residential lands and Flood Zone A\B. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that; Development is constructed in accordance with the site

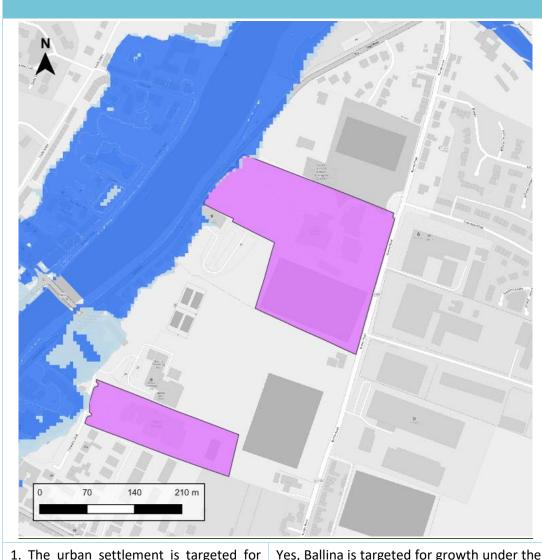
will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment specific FRAs.

- Additional development in Flood Zones A/B should be limited to extensions and renovations.
- Infill highly vulnerable development or change of use to such use is not appropriate until such a time as the Ballina FRS has been constructed and is fully operational.

Any further development of the lands should be subject to an appropriately detailed FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following:

- FRA should address climate change scenarios in relation to FFLs and potential mitigation measures;
- Residential FFLs should be above the 1% AEP level plus climate change and freeboard when extending existing residential property in Flood Zone A/B;
- Bedrooms should be located in the upstairs of two-story buildings when extending existing property;
- Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;
- Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and;
- Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events.
- Any development shall also be required to be built in accordance with MCC SuDS Policy.

A.1.5 Education



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.	Yes, Ballina is targeted for growth under the Regional Spatial Strategy and Economic Strategy (RSES) for the Northern & Western Regional Assembly Area 2020-2032 and the Mayo County Development Plan 2022-2028. In particular Ballina is identified as a Key Town in the 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:	Yes. The zoning of these lands for Education Facilities is required to achieve the proper planning and sustainable development of Ballina.
i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	Yes. Its zoning for these uses is essential to facilitate the continued regeneration of Ballina.

ii. Comprises significant previously developed and/or under-utilised lands:	The lands comprise of previously developed lands.
iii. Is within or adjoining the core of an established or designated urban settlement:	Yes. The lands are located within the development boundary of Ballina, identified as a Key Town in the Mayo County Development Plan (2022-2028) settlement hierarchy.
iv. Will be essential in achieving compact and sustainable urban growth;	Yes. The lands for the proposed use are 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.	The lands are a mix of existing and undeveloped Education Facilities lands considered appropriate to retain the zoning within the settlement boundary of Ballina.
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 limited area of existing education lands are within Flood Zone A\B. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. Any future construction should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following: Only water compatible development should be placed in Flood Zone B; FRA should address climate change scenarios in relation to operational levels and potential mitigation measures; Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Development is constructed in accordance with the site specific FRAs. Any development shall also be required to be built in accordance with MCC SuDS Policy.

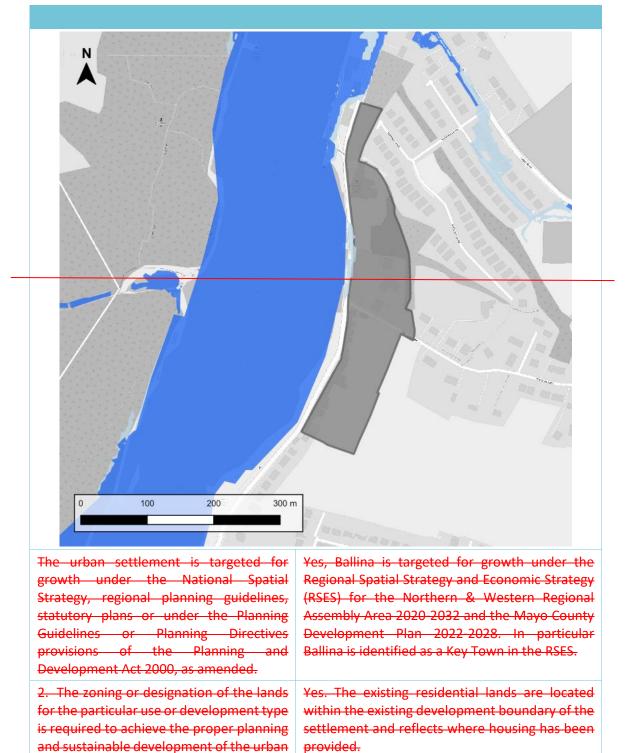
A.2 Glebe

A.2.1 Existing Residential

A.2<u>A.3</u>_Quignamanger

A.2.1 A.3.1 Edge of Town Centre

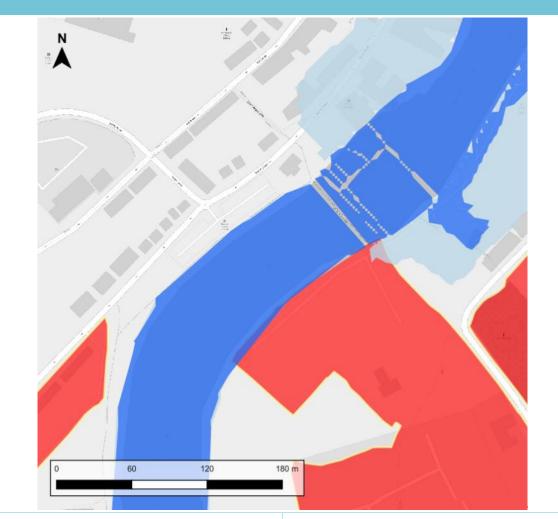
settlement and, in particular:



· · · · ·	
i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	Yes. The lands zoned are established residential lands within Ballina's development boundary. The Existing Residential zoning is essential for the regeneration and/or expansion of the centre of the urban settlement. The Existing Residential zoning designation does not facilitate new development in areas subject to flooding. Any proposed development within the Existing Residential zoning will be subject to a Flood Risk Assessment as required by The Planning System and Flood Risk Management Guidelines.
ii. Comprises significant previously	The type of developments envisaged to occur would include small scale developments such as domestic extensions which would not be permitted in areas subject to flooding and therefore would not increase risk of flooding. Change of use to a more vulnerable class would not be permitted. (Table 3.1 Classification of vulnerability of different types of development) The Planning System and Flood Risk Management Guidelines refers. Yes. The lands comprise of under-utilised lands
developed and/or under-utilised lands:	and existing residential development.
iii. Is within or adjoining the core of an established or designated urban settlement:	Yes. The lands are located within the development boundary of Ballina, identified as a Key Town in the Mayo County Development Plan (2022-2028) settlement hierarchy.
iv. Will be essential in achieving compact and sustainable urban growth;	Yes. Retention of existing residential lands will maintain a strong and cohesive settlement. Any growth in this zoning will be limited to uses which do not increase flood risk.
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 zoning classification 'existing residential' is a unique category of zoning which reflects existing rather than proposed use. There are no alternative zoning categories on lands in lower risk of flooding within or adjoining the core that fulfils the same role as 'existing residential'.
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	There is limited overlap between Flood Zone B and the edge of town centre lands. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. Any further development of the lands should be subject to an appropriately detailed FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically

A.3<u>A.1</u>Glebe





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.	Yes, Ballina is targeted for growth under the Regional Spatial Strategy and Economic Strategy (RSES) for the Northern & Western Regional Assembly Area 2020-2032 and the Mayo County Development Plan 2022-2028. In particular Ballina is identified as a Key Town in the 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:	Yes. The existing residential lands are located within the existing development boundary of the settlement and reflects where housing has been provided.
i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	Yes. The lands zoned are established residential lands within Ballina's development boundary. The Existing Residential zoning is essential for the regeneration and/or expansion of the centre of the urban

	settlement. The Existing Residential zoning
	designation does not facilitate new development in areas subject to flooding. Any proposed development within the Existing Residential zoning will be subject to a Flood Risk Assessment as required by The Planning System and Flood Risk Management Guidelines.
	The type of developments envisaged to occur would include small scale developments such as domestic extensions which would not be permitted in areas subject to flooding and therefore would not increase risk of flooding. Change of use to a more vulnerable class would not be permitted. (Table 3.1 Classification of vulnerability of different types of development) The Planning System and Flood Risk Management Guidelines refers.
ii. Comprises significant previously developed and/or under-utilised lands:	Yes. The lands comprise of under-utilised lands and existing residential development.
iii. Is within or adjoining the core of an established or designated urban settlement:	Yes. The lands are located within the development boundary of Ballina, identified as a Key Town in the Mayo County Development Plan (2022-2028) settlement hierarchy.
iv. Will be essential in achieving compact and sustainable urban growth;	Yes. Retention of existing residential lands will maintain a strong and cohesive settlement. Any growth in this zoning will be limited to uses which do not increase flood risk.
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 zoning classification 'existing residential' is a unique category of zoning which reflects existing rather than proposed use. There are no alternative zoning categories on lands in lower risk of flooding within or adjoining the core that fulfils the same role as 'existing residential'.
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	 Parts of the Existing Residential Zoning are within Flood Zone A\B. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that; Development is constructed in accordance with the site specific

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 FRAs.

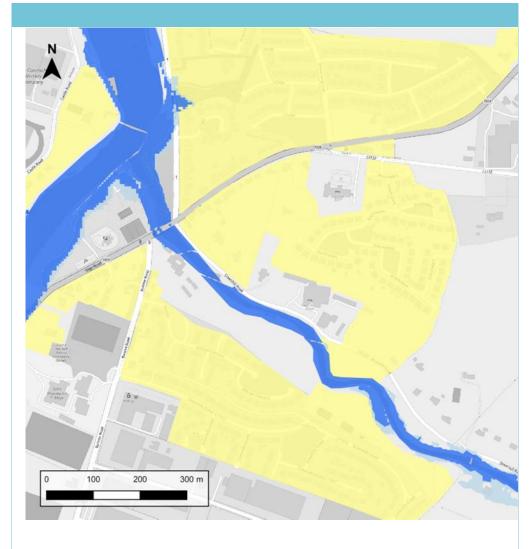
- Additional development in Flood Zones A/B should be limited to extensions and renovations.
- Infill highly vulnerable development or change of use to such use is not appropriate until such a time as the Ballina FRS has been constructed and is fully operational.

Any further development of the lands should be subject to an appropriately detailed FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following:

- FRA should address climate change scenarios in relation to FFLs and potential mitigation measures;
- Residential FFLs should be above the 1% AEP level plus climate change and freeboard when extending existing residential property in Flood Zone A/B;
- Bedrooms should be located in the upstairs of two-story buildings when extending existing property;
- Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;
- Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and;
- Any development shall also be required to be built in accordance with MCC SuDS Policy.

A.4 Abbeyhalfquarter

A.4.1 Existing Residential



 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.
 The zoning or designation of the lands for the particular

of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of Yes, Ballina is targeted for growth under the Regional Spatial Strategy and Economic Strategy (RSES) for the Northern & Western Regional Assembly Area 2020-2032 and the Mayo County Development Plan 2022-2028. In particular Ballina is identified as a Key Town in the RSES.

Yes. The existing residential lands are located within the existing development boundary of the settlement and reflects where housing has been provided.

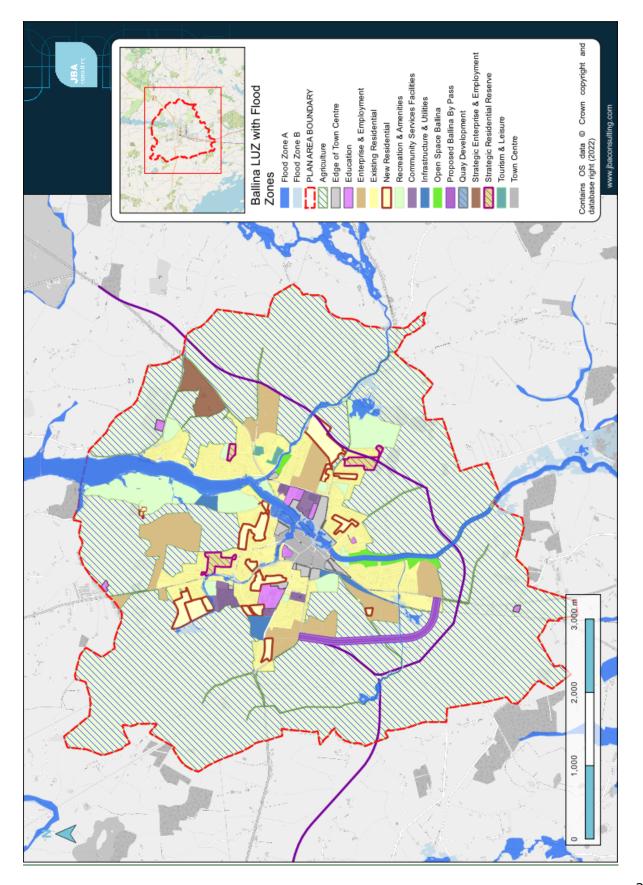
the urban settlement and, in particular:	
 Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement: 	Yes. The lands zoned are established residential lands within Ballina's development boundary. The Existing Residential zoning is essential for the regeneration and/or expansion of the centre of the urban settlement. The Existing Residential zoning designation does not facilitate new development in areas subject to flooding. Any proposed development within the Existing Residential zoning will be subject to a Flood Risk Assessment as required by The Planning System and Flood Risk Management Guidelines.
	The type of developments envisaged to occur would include small scale developments such as domestic extensions which would not be permitted in areas subject to flooding and therefore would not increase risk of flooding. Change of use to a more vulnerable class would not be permitted. (Table 3.1 Classification of vulnerability of different types of development) The Planning System and Flood Risk Management Guidelines refers.
 ii. Comprises significant previously developed and/or under-utilised lands: 	Yes. The lands comprise of under-utilised lands and existing residential development.
 iii. Is within or adjoining the core of an established or designated urban settlement: 	Yes. The lands are located within the development boundary of Ballina, identified as a Key Town in the Mayo County Development Plan (2022-2028) settlement hierarchy.
iv. Will be essential in achieving compact and sustainable urban growth;	Yes. Retention of existing residential lands will maintain a strong and cohesive settlement. Any growth in this zoning will be limited to uses which do not increase flood risk.
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 zoning classification 'existing residential' is a unique category of zoning which reflects existing rather than proposed use. There are no alternative zoning categories on lands in lower risk of flooding within or adjoining the core that fulfils the same role as 'existing residential'.
3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment	A limited area of Existing Residential zoning is within Flood Zone A\B. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that;

as part of the development plan preparation process, which demonstrates that flood risk the to development be can 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 made should be with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment

- Development is constructed in accordance with the site specific FRAs.
- Additional development in Flood Zones A/B should be limited to extensions, renovations, change of use or water compatible uses.
- Infill residential development and demolition and reconstruction can only take place in Flood Zone C.

Any future development should be subject to an FRA which should follow the general guidance provided in Section 7 of the SFRA and must specifically address the following:

- FRA should address climate change scenarios in relation to FFLs and potential mitigation measures;
- Bedrooms should be located in the upstairs of two-story buildings when extending existing property when extending existing residential property in Flood Zone A/B;
- Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;
- Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and;
- Any development shall also be required to be built in accordance with MCC SuDS Policy.



B Ballina Land Use Zoning and Flood Zones