McCloy Consulting

Strategic Flood Risk Assessment

for Proposed Variation (No. 1) to the County Donegal Development Plan 2024-2030

January 2026



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PROJECT DIRECTOR	Kyle Somerville
PROJECT MANAGER	Paul Singleton
AUTHOR(S)	Mistaya Langridge, Paul Singleton
BRANCH	DUBLIN Unit 12, The BEaT Centre, Stephenstown Industrial Estate, Balbriggan T: +353 (0)1 5138963 | W: www.mccloyconsulting.ie

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1 INTRODUCTION

1.1 Terms of Reference

This Strategic Flood Risk Assessment (SFRA) was commissioned by Donegal County Council (CC) as part of the preparation of the Proposed Variation (No. 1) to the County Donegal Development Plan 2024-2030. The Proposed Variation:

- **Insert new Area Plans** for An Clochán Liath (Dungloe), Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs into the Development Plan and make associated amendments to Chapter 17 – General Introduction to Area Plans and Table 3.7 Core Strategy Table.
- **Amend the zoning of site NR2.16 at Cockhill, Buncrana** – from 'New Residential Phase 2' to 'New Residential Phase 1' within the Buncrana Area Plan Land Use Zoning Map.
- **Amend land use zonings on foot of Residential Zoned Land Tax (RZLT) related landowner submissions**, where appropriate, within affected settlements throughout Donegal.
- **Replace the proposed Natural Heritage Area (pNHA) Zonings with Local Environment and Open Space and Recreation Zonings within the Letterkenny Plan Land Use Zoning Map.**

The Planning Guidelines for Strategic Environmental Assessment (SEA) (DEHLG, 2004) outline an integrated process for SEA and plan-making. As stated in the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004), a Strategic Environmental Assessment (SEA) may be required as part of the preparation of Local Area Plans (LAPs) to assess the likely significant effects of the plan's implementation on the environment.

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

A local area plan must be consistent with the objectives of its development plan, its core strategy, the National Planning Framework, and any relevant Regional Spatial and Economic Strategy.

1.2 Statement of Authority

This assessment and report have been prepared and reviewed by the following qualified professionals:

- Mistaya Langridge *BEng (Hons) MASc MIEI* – Senior Engineer with experience in hydrology, hydraulic modelling, and flood risk assessment.
- Paul Singleton *BEng (Hons) MSc CEng MIEI* – Associate Director and Chartered Engineer specialising in flood risk assessment, hydrology, surface water management, and SuDS design, and a recognised industry professional providing training courses on these topics to the public and private sectors in Ireland and the UK.
- Kyle Somerville *BEng (Hons) CEng MIEI* – Director and Chartered Engineer specialising in flood risk assessment, hydrology, hydraulic modelling, surface water management, and SuDS design.

1.3 Purpose and Scope

The purpose of this report is to present a LAP-scale SFRA for the settlements of An Clochán Liath (Dungloe), Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs and proposed variation areas. In accordance with the OPW Guidelines, the scope of this SFRA report includes the following:

- Enable an improved understanding of flood risk issues within the proposed variation areas and development management process for An Clochán Liath (Dungloe), Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs, and communicate this to a wide range of stakeholders.
- Identify natural floodplain areas that should be safeguarded.
- Produce a suitably detailed Flood Risk Assessment (FRA) that draws on and extends existing data and information and that leads to a suite of flood risk maps that support the application of the sequential approach in key areas where there may be tension between development pressures and avoidance of flood risk.

- Inform, where necessary, the application of the Justification Test and the avoidance of development pressure in areas of flood risk.
- Conclude whether measures to deal with flood risks to areas proposed for development can reduce the risks to an acceptable level while not increasing flood risk elsewhere.
- Produce guidance on flood mitigation measures, how surface water should be managed, and appropriate criteria to be used in the review of site-specific FRAs.

1.4 Approach to the Assessment

The purpose of this SFRA is to provide a broad (area-wide) assessment of all types of flood risk in the settlements of An Clochán Liath (Dungloe), Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs to inform strategic land use planning decisions as part of the preparation of new Area Plans inserted and proposed amendments in Buncrana, Ballybofey-Stranorlar, and Letterkenny, within the County Donegal Development Plan 2024-2030 as part of the Proposed Variation (No.1). This report will allow Donegal CC to apply the sequential approach and, where necessary, the Justification Test to identify appropriate areas / sites within the Plan Area for development and identify how flood risk can be reduced as part of the LAP process.

This assessment is intended for 'plan making' only and is not intended to assess the risk to development proposals. Risk to any future developments within the Plan Area would be assessed separately by Site-Specific Flood Risk Assessments (SSFRAs) submitted in support of planning applications. While any future SSFRA may be informed by flood hazard information determined by this assessment, it would need to be made specific to a proposed development.

A review of available flood risk information has been undertaken to identify any flooding or surface water management issues in the Plan Areas that warrant further investigation. Based on available data, areas at risk of flooding and Flood Zones were identified in order to supplement the Proposed Variation No. 1. The SFRA can include all levels of flood risk assessment, as described in the OPW Guidelines.

Having prepared a Strategic Flood Risk Assessment and mapped Flood Zones as part of its LAP review process and any more detailed flood risk assessments as necessary, situations can arise where a planning authority will need to consider the future development of areas at a high or moderate risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate. In such cases, the planning authority must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning or designation for development will satisfy the Justification Test.

Further detail regarding the required contents of a LAP SFRA, as outlined in the OPW Guidelines, is included in Section 3.11.

2 PLAN AREA INFORMATION

2.1 Location and Boundary

The Proposed Variation includes new Area Plans for the An Clochán Liath (Dungloe), Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs (hereafter, the 'Settlement Areas'). The 'Plan Area' encompasses the six new Area Plan boundaries (hereafter, the 'Settlement Areas'), located across County Donegal as shown in in Figure 2.1, as well as the proposed amendments in Buncrana, Ballybofey-Stranorlar, and Letterkenny.

Figure 2.1: New Area Plan Boundaries



2.2 Watercourses

The Plan Areas are located across County Donegal, primarily in coastal areas with major rivers such as the Rivers Eske, River Erne, and River Swilly meeting the sea within the settlement boundaries.

The Plan Areas are characterized by the following major water features:

- An Clochán Liath (Dungloe): The Dungloe River flows out of Dungloe Lough and into the sea
- Ballyshannon: Ballyshannon is bisected by the River Erne where it meets the sea at Donegal Bay conveying flows from Assaroe Lake
- Bridgend: Located within the Lough Swilly catchment, as characterised by several watercourses passing through the settlement towards Lough Swilly in its transitional range.
- Carndonagh: Carndonagh is located just upstream of two of the main river sources of Trawbreaga Bay, a tidal estuary at the north of Inishowen in Donegal. The Donagh and Glennagannon Rivers are the main sources of fluvial flood risk to Carndonagh.
- Donegal Town: The River Eske flows from Lough Eske through Donegal Town to Donegal Bay
- Killybegs: Killybegs is characterised by its harbour, with minor coastal watercourses such as the Cunlin Lough Stream flowing through the town to the sea.
- Ballybofey-Stranorlar: The River Finn conveys flows from the west Donegal uplands eastwards through Stranorlar and Ballybofey before joining the Mourne River at Lifford to form the River Foyle.
- Buncrana: Buncrana is situated on the lower reaches of the River Crana, which flows through the town from Lough Doo and Lough Altan before discharging into Lough Swilly.
- Letterkenny: Letterkenny is located along the River Swilly, which flows eastwards through the town before discharging into Lough Swilly.

The general topography of the county means all major watercourses withing the county flow in a radial pattern from the uplands in the centre and northwest of the county to the coast.

Donegal CC have provided a GIS shapefile of OSI Prime2 delineated watercourses and streams within the Plan Area as shown in the appended flood zone mapping for each settlement area. The dataset has been combined with the Environmental Protection Agency (EPA) watercourse data to give a comprehensive picture of watercourses in the Plan Areas. However, it is acknowledged that the EPA watercourse dataset is not intended to be exhaustive and does not capture all open waterbodies within the Plan Area as there are minor streams and ditches which will not have been captured / included. The mapped watercourses capture all watercourses with sufficient catchments to be included on Flood Zone datasets (refer to Section 4.2) and as such omission of minor watercourses from the mapped dataset is not a material consideration in terms of establishing Flood Zones.

2.2.1 Hydrometric Areas

The Plan Areas lie within five Hydrometric Areas as defined by the OPW: 36 Erne (Ballyshannon), 37 Donegal Bay North (Killybegs, Donegal Town), 38 Gweebarra-Sheephaven (Dungloe), 39 Lough Swilly (Bridgend, Buncrana, Letterkenny), 40 Donagh-Moville (Carndonagh) and 01 Foyle (Stranorlar).

The Erne Catchment includes the area drained by the River Erne and all streams entering tidal water between Aughrus Point and Kildoney Point, including at Ballyshannon where the River Erne meets the sea. This is a cross border catchment with a surface area of 4,415km², 2,512km² of which is located within the Republic of Ireland.

The Donegal Bay North Catchment includes the area drained by all streams entering tidal water between Kildoney Point and Rossan Point, Co. Donegal, draining a total area of 804km². Donegal Town and Killybegs are the largest urban centres in the catchment. This catchment comprises the rugged landscape surrounding the northern and eastern sides of Donegal Bay from the 600m high sea cliffs of Slieve League in the west to the southern slopes of the Bluestack Mountains in the northeast. A large proportion of the lowlands in the catchment are characterised by an extensive drumlin landscape which indicates the seaward movement of ice in this area during the last ice age.

The Gweebarra-Sheephaven Catchment includes the area drained by all streams entering tidal water in Gweebarra River, Sheephaven Bay and between Rossan Point and Fanad Head, Co. Donegal, draining a total area of 1,450km².

The Lough Swilly Catchment includes the area drained by all streams entering tidal water in Lough Swilly between Fanad Head and Dunaff Head, Co. Donegal, draining a total area of 965km².

The Donagh-Moville Catchment includes the area drained by the River Donagh and all streams entering tidal water between Dunaff Head and Culmore Point, Co. Derry, draining a total area of 507km². The largest urban centre in the catchment is Carndonagh. The catchment is largely mountainous and is entirely underlain by metamorphic rocks that provide limited groundwater resources[1].

2.3 Climate Change

Climate change is an important theme in the Donegal County Development Plan 2024-2030, and further highlighted by Donegal County Council's Climate Adaptation Strategy 2019-2024.

Donegal CC have adopted a conservative and proactive approach to climate change adaptation, by adopting the High-End Future climate change scenario in the delineation of flood zones. Donegal CC has taken the stance that as there is an increasing likelihood that Irelands climate will be similar to that depicted in the High-End Future climate change scenario by the year 2100, it is prudent to consider the HEFS parameters when planning for vulnerable infrastructure and developments.

It is also recognised that the nature of Donegal's economy, infrastructure (i.e., roads, electricity networks, water supply and sewer systems), settlement patterns, physical geography, and mixed land use presents a unique set of challenges in terms of the required response to climate change, given the largely coastal nature and increasing impacts. It is the vision of this LAP to support the settlements within Proposed Variation No.1 as places to work, live, visit and do business, by delivering a co-ordinated regeneration strategy, promoting the re-development of underused sites, enhancing town centre services, enabling residential development and protecting and showcasing the urban cores.

The development plan and local area plans make provisions for climate change mitigation and adaptation in areas such as flood risk management, transportation, surface water, waste management, water services, urban design, energy, natural heritage, and green infrastructure.

Further information and guidance relating to flood risk impact and considerations of climate change are contained in Section 3.8.

[1] Catchment.IE available at; https://www.catchments.ie/ [Accessed 04/07/2025]

2.4 Donegal County Development Plan 2024-2030

Flood risk management within the county, and any proposed development, should be in line with the Donegal County Development Plan 2024-2030. Key provisions as set out in the County Development Plan relating to flood risk management are as set out below.

Table 2.1: Donegal County Development Plan 2024-2030 Provisions relating to Flood Risk Management

Objectives

F-O-1	To ensure that development does not give rise to unacceptable new flood risks or does not exacerbate existing flood risk.

Policies

F-P-1 CC	To only permit development where flood or surface water management issues can be successfully addressed and/or where there is no unacceptable residual flood risk for the development, its occupants and/or private property or public infrastructure elsewhere within the catchment. A precautionary approach shall be applied to the consideration of flood risk issues and shall include the application of the 'Avoid', 'Substitute', 'Justify' principles set out in the EU Floods Directive (2007/60/EC) and 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities', November 2009, DoEHLG. Where appropriate, applicants/developers shall be required to submit: a. an independent 'Flood Risk Assessment' in accordance with the aforementioned Guidelines or any subsequent related publication and/or 'Surface Water Drainage Calculations', from suitably qualified persons; and b. evidence of compliance with the Justification test set out in Section 5.15 of the aforementioned Guidelines or any subsequent related publication.
F-P-2 CC	a. To require the use of Sustainable Urban Drainage Systems (SUDs) including flood attenuation areas, wetlands, the controlled release of surface waters and use of open spaces and semi-permeable hard surfaces for urban development proposals. b. Support the removal of existing stormwater discharging to combined (foul and storm) sewers using nature-based solutions. c. Not to support the discharge of additional surface water to combined sewers.
F-P-3 CC	To support the development of long and short-term flood remediation works, including embankments, sea defenses, drainage channels, and attenuation ponds and wetlands, subject to environmental considerations including potential impact on designated shellfish water and fresh water pearl mussel catchment areas, compliance with Article 6 of the Habitats Directive, best practice in Coastal Zone Management and the Marine Resource and Coastal Management policies of this Plan.
F-P-4	Not to permit developments which would hinder the maintenance of river or drainage channels.

2.5 Proposed Variation No. 1

Further to the measures integrated into the existing Donegal County Development Plan 2024-2030 (see Section 2.4 above), several key policies and objectives relating to flood risk and drainage have been integrated into the new Area Plans and Proposed Variation No.1 as set out in Table 6.4 below.

Table 2.2: Proposed Variation No. 1 Provisions relating to Flood Risk Management

Provisions including:
GEN-F-P-1: a. Within areas zoned as 'Established Development 2', only minor developments (e.g., small extensions to houses, most changes of use of existing buildings and/or extensions and additions to existing commercial and industrial enterprises) will be supported, where it can be demonstrated that they will not obstruct important flow paths, introduce a significant additional number of people into flood risk areas or entail the storage of hazardous substances). b. Such applications shall be accompanied by a commensurate assessment of the risks of flooding to demonstrate that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities. Such proposals shall follow best practice in the management of health and safety for users and residents of the proposal.
GEN-F-P-2: a. Within areas zoned as 'Local Environment 2', only minor developments (e.g., small extensions to existing agricultural, residential or commercial buildings) will be supported, where it can be demonstrated that they will not obstruct important flow paths, introduce a significant additional number of people into flood risk areas or entail the storage of hazardous substances). b. Such applications shall be accompanied by a commensurate assessment of the risks of flooding to demonstrate that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities. Such proposals shall follow best practice in the management of health and safety for users and residents of the proposal.
BE-F-O-1: To ensure that development does not give rise to unacceptable new flood risks or does not exacerbate existing flood risk where such development would exacerbate issues of flooding on the Skeoge River and jeopardise third party properties
CN-F-O-1: Deliver all aspects of the Carn Domhnach/Carndonagh Flood Relief Scheme.
CN-F-P-1: Positively consider all developments associated with the Carn Domhnach/Carndonagh Flood Relief Scheme. Ensure that all development proposals shall be compatible with, and not otherwise impede or prevent the delivery of the scheme.
DT-F-O-1: Deliver all aspects of the Baile Dhún na nGall (Donegal Town) Flood Relief Scheme.
DT-F-O-2: Ensure that development does not give rise to unacceptable new flood risks nor exacerbate existing flood risk within, or adjoining, lands identified as being within Flood Risk Zones A and B, illustrated in Figure 25.4 above.
DT-F-P-1: a) Positively consider all developments associated with the delivery of the Baile Dhún na nGall (Donegal Town) Flood Relief Scheme. b) Ensure that all development proposals shall be compatible with, and not otherwise impede or prevent the delivery of the Baile Dhún na nGall (Donegal Town) Flood Relief Scheme.

Provisions including:
DT-F-P-2: Proposals for all development must demonstrate that surface water management issues can be successfully addressed, that they do not exacerbate flood risk elsewhere and utilize Sustainable Urban Drainage Systems in accordance with the Flood Risk Management objectives and policies contained in Section 8.4 of this Plan.
DT-TC-O-7: To ensure all development proposals within the Urban Area comply with the objectives and policies contained within Section 8.4, Flooding, of this Plan.
DT-TC-P-7: To require that proposals for development within the Urban Core fully comply with the Objectives and Policies contained within Section 8.4, Flooding, of this Plan. Where development proposals fall within an area identified as Flood Zone A or Flood Zone B, a Site Specific Flood Risk Assessment (SSFRA) shall be required, demonstrating that surface water management issues can be successfully addressed, there is no unacceptable residual flood risk to the development and the development will not exacerbate flood risk elsewhere.
KB-F-O-1: To manage or prohibit development, including development that would be otherwise exempt, where such development would potentially exacerbate issues of flooding of the Drumbeagh River, most particularly onto Bridge Street.
KB-F-O-2: Work in collaboration with the Office of Public Works to devise and thereafter implement flood relief works to mitigate against flooding of roads and property from the Drumbeagh River, most particularly at the Shore Road Bridge and further upstream at Bridge Street.
Additional provisions KB-TC-O-1 & Policies KB-TC-P-1, KB-TC-P-3 set out additional restrictions for development within the Urban Core to restrict vulnerable development.
Additional provisions in relation to specific Opportunity Site, Masterplan and site-specific Policies, as outlined in the written statement, including but not limited to: ACL-OPP-P-1, ACL-OPP-P-2, BN-H-P-2, BN-TC-P-4, BN-OPP-P-1, BN-OPP-P-2, BN-OPP-P-4, BE-OPP-P-3 CN-BH-P-1, DT-TC-P-3, DT-TC-P-4, DT-ED-P-3, DT-CREH-P-5, KB-TC-P-1, KB-TC-P-3, KB-TC-P-3, KB-O-P-2,3,4,10, KB-O-P-5 and KB-O-P-8.

2.6 Land Use Zonings

The Local Area Plan sets out a range of land use zonings and zoning objectives, as shown in Table 2.3 (as per Proposed Variation No. 1 Table 17.1. The Flood Zone maps included in Appendix A were prepared to assist with land use zoning decisions in areas that have been assessed as being at risk of flooding.

Land use zoning for Proposed Variation No. 1 have been overlain with Flood Zone mapping to determine where Plan-Making Justification Tests are required. Land use zoning vulnerability was agreed through consultation with Donegal CC, as outlined in subsequent sections.

Table 2.3: Land Zoning Objectives

Zoning	Objective
Established Development 1	To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement, including new residential and commercial development, subject to all relevant material planning considerations, all the policies of this Plan, relevant national/regional policy/guidance including environmental designations and subject to the proper planning and sustainable development of the area.
Established Development 2	To conserve and enhance the quality and character of the area, to protect residential amenity and only support applications for minor developments, such as small extensions to houses, and most changes of use of existing buildings and / or extensions and additions to existing commercial and industrial enterprises.
New Residential (Phase 1)	Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.
New Residential (Phase 2)	Provide for new residential development in tandem with the provision of the necessary social and physical infrastructure on a phased basis that provides for the sequential development of settlements from the centre out.
Strategic Residential Reserve	To reserve a quantum of land primarily for residential development as a long term strategic landbank.
Urban Core	Provide for the development and enhancement of urban core uses including retail, residential, commercial, civic and other uses.
Community Infrastructure	Provide for and protect civic, religious, community, health care, educational and social infrastructure.
Open Space and Recreation	Preserve and provide for open space, biodiversity and recreational amenities.
Regeneration	Provide for public realm, civic, community, enterprise and/or residential led regeneration.

Zoning	Objective
Opportunity Site	To reserve lands for specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area (See Specific Opportunity Site Policies).
Business / Enterprise	Provide opportunities for general enterprise and business development.
Local Environment 1	To provide for limited development only ensuring no significant negative impact on the landscape setting or the biodiversity quality of the area.
Local Environment 2	Protect and improve rural amenity and only support applications for minor agricultural, residential and commercial developments, such as small extensions to existing buildings.
Tourism	Provide for tourism Related facilities and amenities.
Transport and Utilities Infrastructure	Provide for transport and utilities infrastructure.
Caravan Park	To allow for the development of new caravan parks, the enhancement and appropriate expansion of existing caravan parks and development of associated tourist facilities.
High Amenity	Protect and enhance high amenity areas.
Ballybofey / Stranorlar Specific: TEN-T PRIPD / Established Development	To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement, including new residential and commercial development, subject to all relevant material planning considerations, all the policies of this Plan, relevant national/regional policy/guidance including environmental designations and subject to the proper planning and sustainable development of the area and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
Ballybofey / Stranorlar Specific: TEN-T PRIPD / Opportunity Site	To reserve lands for specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area (See Specific Opportunity Site Policies) and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
Ballybofey / Stranorlar Specific: TEN-T PRIPD / Local Environment	Protect and improve rural amenity, provide for the development of agriculture and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
Ballybofey / Stranorlar Specific: TEN-T PRIPD / Open Space and Recreation	Preserve and provide for open space and recreational amenities and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.

Zoning	Objective
Buncrana Specific: Settlement Consolidation Sites	To deliver sustainable compact growth that is strategic in nature and scale.
Bundoran Specific: Coastal Management Zone	To ensure that this area remains free from development but facilitates access as an important local amenity.
Na Cealla Beaga (Killybegs) Specific: Port/Harbour Related	To retain and enhance the port/harbour related function for proposals for appropriate new commercial/industrial/harbour-related/tourism related developments.
An Clochán Liath Specific: Marina	To facilitate the development of a marina use and other water based recreational activity.

3 APPROACH AND METHODOLOGY

3.1 Introduction

The approach and methodology adopted by this SFRA have been informed by the OPW Guidelines and associated Technical Appendices. The OPW Guidelines are therefore implemented and embedded in the context of the new Area Plans for An Clochán Liath (Dungloe), Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs, and the proposed amendments to land use zonings within Buncrana, Letterkenny, and Ballybofey-Stranorlar.

3.2 Objectives and Principles of the OPW Guidelines

The SFRA recognises the core objectives of the OPW Guidelines, which are to:

- Avoid inappropriate development in areas that are at risk of flooding.
- Prevent new developments from increasing flood risk elsewhere, including flood risk that may arise from surface water runoff.
- 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.
- 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.

In achieving the aims and objectives of the OPW Guidelines, Donegal CC need to:

- Adopt a sequential approach to flood risk management, which aims to avoid flood risk where possible, substitute less vulnerable uses where avoidance is not possible, and mitigate and manage the risk where avoidance and substitution are not possible.
- Apply the Justification Test for development in flood risk areas.

A precautionary approach should also be applied to flood risk management to reflect uncertainties in existing flooding datasets and risk assessment techniques and in the ability to predict the future climate, the future performance of existing flood defences, and the extent of future coastal erosion. Development should therefore be designed with careful consideration of likely future changes in flood risk, including the effects of climate change and coastal erosion, to ensure that future occupants are not subject to unacceptable risks.

3.3 Types of Flooding

Flooding is defined in the OPW Guidelines as a temporary covering by water of land not normally covered by water and as a natural process that can occur at any time in a variety of locations. Flooding can occur from different sources, acting alone or in combination, including:

- Coastal flooding (from the sea or estuaries)
- Fluvial flooding (from rivers or other watercourses)
- Pluvial flooding (from intense rainfall events and overland flow)
- Groundwater flooding (typically from turloughs in Ireland)
- Other sources (e.g., blocked drains or pipes)

3.3.1 Coastal Flooding

Coastal flooding occurs when water from the sea (along the coast or in estuaries) overflows onto adjacent land or overtops coastal flood defences where these exist. Coastal flooding is influenced by three factors, which often act in combination: high tide level, storm surges (caused by low atmospheric pressure and exacerbated by high winds), and wave action (dependent on wind speed and direction, local topography, and exposure).

An Clochán Liath (Dungloe), Killybegs, Donegal Town, Ballyshannon, Buncrana, and Letterkenny are located in coastal areas, and therefore coastal flood risk is considered as part of this assessment.

3.3.2 Fluvial (River) Flooding

Fluvial flooding occurs when rivers and other watercourses burst their banks and water flows out onto the adjacent low-lying areas (the natural floodplains). This can occur where the capacity of the channel is exceeded and / or where the channel is blocked or constrained.

A storm of a given rainfall depth and duration may cause flooding in one river but not in another, and some catchments may be more prone than others to prolonged rainfall or to a series of rainfall events. Changes in rainfall patterns (e.g., due to climate change) may also have different impacts on flood magnitude and frequency in different catchments. The response to rainfall events depends on factors such as the size and slope of the river and catchment, the permeability of the soil and underlying bedrock, the degree of urbanisation within the catchment, and the degree to which floodwater can be stored and slowly released by lakes and natural floodplains.

3.3.3 Pluvial (Rainfall) Flooding

Pluvial or surface water flooding occurs when the amount of rainfall exceeds the capacity of urban storm water drainage systems or the ground to absorb it. This excess water flows overland, ponding in natural or man-made hollows and low-lying areas or behind obstructions. This occurs as a rapid response to intense rainfall before the flood waters eventually enter a piped or natural drainage system. This type of flooding is driven in particular by short, intense rainfall events.

3.3.4 Groundwater Flooding

Groundwater flooding occurs when the level of water stored in the ground rises as a result of prolonged rainfall, to meet the ground surface and flows out over it, i.e. when the capacity of this underground reservoir is exceeded. Groundwater flooding tends to be very local and results from the interaction of site-specific factors such as local geology and tidal variations. While water level may rise slowly, groundwater flooding can last for extended periods of time. Hence, such flooding may often result in significant damage to property and disruption.

3.3.5 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 area draining to the system, in particular planning 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 area with under-capacity systems. In the larger events that are less frequent but have a higher consequence, surface water will exceed the capacity of 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. Whilst such incidents can give an idea of those areas with limited drainage capacity, it is only a record of the hydraulic inadequacies of the sewer systems, not properties at risk of flooding. Therefore it has limited usefulness in predicting future flooding.

3.3.6 Other Sources

The above causes of flooding are all natural; caused by heavy or intense rainfall. Floods can also be caused by the failure or exceedance of capacity of built or man-made infrastructure, such as bridge collapses, from blocked or under-sized drainage systems or other piped networks, or the failure or overtopping of reservoirs or other water-retaining embankments (such as raised canals).

3.4 Definition of Flood Risk

Flooding presents a risk only when people, property, infrastructure, and / or environmental assets are located in the area that could potentially flood. Flood risk is defined as the product of the likelihood of the occurrence of a flood event and the potential consequences arising from that flood event. It is expressed as follows:

Flood Risk = Likelihood of Flooding x Consequences of Flooding

3.4.1 Likelihood of Flooding

The likelihood of flooding is defined in the Guidelines as the percentage probability of a flood of a given magnitude or severity occurring or being exceeded in any given year. It is generally expressed as a return period or as an annual exceedance probability (AEP). For example, a 1% AEP indicates the severity of a flood that has a 1 in 100 (1%) chance of occurring or being exceeded in any one year. Annual exceedance probability is the inverse of return period, as shown in Table 3.1.

Table 3.1: Return Periods and Annual Exceedance Probabilities

Return Period (Years)	Annual Exceedance Probability (%)
1	100
10	10
50	2
100	1
200	0.5
1000	0.1

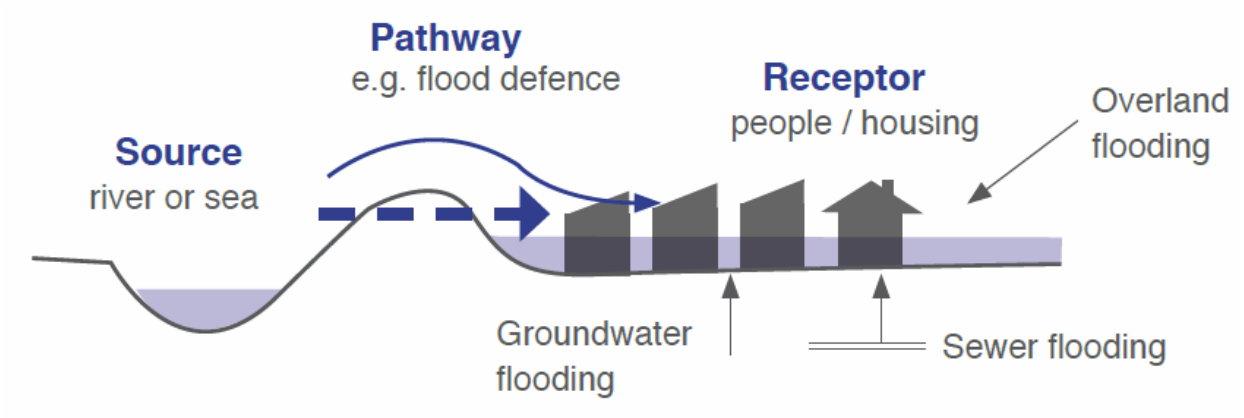
3.4.2 Consequences of Flooding

The consequences of flooding are determined by the hazards associated with the flooding (depth of water, speed, flow, rate of onset, duration, wave action, water quality) and the vulnerability of people, property, and environment assets potentially affected by a flood (age profile of the population, type of development, presence, and reliability of mitigation measures).

3.5 Source-Pathway-Receptor

This SFRA, in line with the OPW Guidelines, advocates the use of the Source-Pathway-Receptor model in Flood Risk Assessments (FRA) to identify the sources of flooding (e.g. intense or prolonged rainfall leading to increased runoff and increased flow in rivers and sewers), the people and assets impacted by flooding (receptors) and the pathways by which the flood water reaches those receptors (e.g. overland flow, river and coastal floodplains, river channels and sewers). Figure 3.1 shows the source-pathway-receptor model from the OPW Guidelines.

Figure 3.1: Sources, Pathways and Receptors of Flooding



3.6 Flood Zones

Flood Zones are geographical areas within which the likelihood of flooding is in a particular range. This SFRA in conjunction with the Donegal County Development Plan 2024- 2030 and OPW Guidelines defines three Flood Zones for flooding from rivers and sea only as indicated in Table 3.2.

Table 3.2: Flood Zones

Flood Zone	Description	Probability (Rivers)	Probability (Sea)
A	Probability of flooding from rivers and sea is highest	Greater than 1% or 1-in-100	Greater than 0.5% or 1-in-200
B	Probability of flooding from rivers and sea is moderate	Between 0.1% or 1-in-1000 and 1% or 1-in-100	Between 0.1% or 1-in-1000 and 0.5% or 1-in-200
C	Probability of flooding from rivers and sea is low (any parts of the Plan Area not in Flood Zone A or B)	Less than 0.1% or 1-in-1000	Less than 0.1% or 1-in-1000

When determining Flood Zones, the presence of flood protection structures should be ignored as areas protected by flood defences still carry a residual risk from overtopping or breach of defences.

As part of the Donegal County Development Plan 2024-2030, Donegal CC has decided to take a proactive approach to climate change adaption and includes the High-End Future Scenario for climate change in delineation of flood zones.

3.7 Receptor Vulnerability

The vulnerability of development to flooding depends on the nature of the development, its occupation and the construction methods used. The classification of different land uses and types of development as highly vulnerable (including essential infrastructure), less vulnerable, and water compatible is influenced primarily by the ability to manage the safety of people in flood events and the long-term implications for recovery of the function and structure of buildings.

Zone A - High probability of flooding. Most types of development would be considered inappropriate in this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports, and recreation, would be considered appropriate in this zone.

Zone B - Moderate probability of flooding. Highly vulnerable development, such as hospitals, residential care homes, Garda, fire, and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure, would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met. Less vulnerable development, such as retail, commercial and industrial uses, sites used for short-let for caravans and camping and secondary strategic transport and utilities infrastructure, and water-compatible development might be considered appropriate in this zone.

In general, however, less vulnerable development should only be considered in this zone if adequate lands or sites are not available in Zone C and subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can or will adequately be managed.

Zone C - Low probability of flooding. Development in this zone is appropriate from a flood risk perspective (subject to assessment of flood hazard from sources other than rivers) but would need to meet the normal range of other proper planning and sustainable development considerations.

Table 3.3: Receptor Vulnerability Classifications

Vulnerability Classification	Land Uses / Type of Development *
Highly Vulnerable Development (including Essential Infrastructure)	• Garda, ambulance, and fire stations and command centres required to be operational during flooding • Hospitals • Emergency access and egress points • Schools • Dwelling houses, student halls of residence, and hostels • Residential institutions such as residential care homes, children's homes, and social services homes • Caravans and mobile home parks • Dwelling houses designed, constructed, or adapted for the elderly or other people with impaired mobility • Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution in the event of flooding (SEVESO sites, IPPC sites, etc.)
Less Vulnerable Development	• Buildings used for: retail, leisure, warehousing, commercial, industrial, and non-residential institutions • Land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plans • Land and buildings used for agriculture and forestry • Waste treatment (except landfill and hazardous waste) • Mineral working and processing • Local transport infrastructure.

Vulnerability Classification	Land Uses / Type of Development *
Water Compatible Development	• Flood control infrastructure • Docks, marinas, and wharves • Navigation facilities • Ship building, repairing, and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location • Water-based recreation and tourism (excluding sleeping accommodation) • Lifeguard and coastguard stations • Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms • Essential ancillary sleeping or residential accommodation for staff required by uses in this category (subject to a specific warning and evacuation plan)

** Uses not listed here should be considered based on their own merits.*

3.8 Climate Change Adaptation

It is likely that climate change will have an impact on flood risk in Ireland as a result of rising sea levels and more frequent extreme rainfall events. There could be serious consequences for County Donegal and the Plan Areas, where the urban centres are located on the banks of major rivers and within coastal areas. Climate change is a dynamic process that requires a precautionary and flexible approach to ensure appropriate provision for or adaptation to its potential consequences.

Guidance on climate change objectives and actions is set out in Climate Change Sectoral Adaptation Plan published by the OPW in 2019. The first Climate Change Sectoral Adaptation Plan was published in 2015 under the mandate of the National Climate Change Framework. A new plan was prepared in 2019 with updates to the previous plan made based on new information available on climate change and its potential impacts and developments in flood risk management since 2015.

The long-term goal adopted by the OPW on climate adaptation for flooding and flood risk management is "Promoting sustainable communities and supporting our environment through the effective management of the potential impacts of climate change on flooding and flood risk." To deliver on this goal, the OPW has identified the following adaptation objectives:

- Objective 1: Enhancing our knowledge and understanding of the potential impacts of climate change for flooding and flood risk management through research and assessment
- Objective 2: Adapting flood risk management practice to effectively manage the potential impact of climate change on future flood risk
- Objective 3: Aligning adaptation to the impact of climate change on flood risk and flood risk management across sectors and wider Government policy

A number of actions have been identified under each adaptation objective across the areas of activity in flood risk prevention, protection and preparedness and resilience, as well as in further research and capacity building. Flooding has the potential to affect all sectors and local authorities, and coordination is critical towards ensuring a coherent and whole of government approach to climate resilience in relation to flooding and flood risk management.

Based on the Sectoral Adaptation Plans, the OPW adopted two indicative potential futures for flood risk assessment; the Mid-Range Future Scenario (MRFS) and the High-End Future Scenario (HEFS). These were selected to reflect, based on information available at the time, a future in the latter part of the century that would be:

- typical or near to the general average of the future climate projections (MRFS)
- a more extreme future based on the upper end of the range of projections of future climatic conditions and the impacts such changes would have on the drivers of flood risk (HEFS).

The allowances, in flood risk terms, for both the MRFS and HEFS are shown in Table 3.4.

Table 3.4: OPW Climate Change Allowances

Parameter	Mid-Range Future Scenario (MRFS)	High End Future Scenario (HEFS)
Mean Sea Level Rise	+ 500mm	+ 1000mm
Peak River Flood Flows	+ 20%	+ 30%
Extreme Rainfall Depths	+ 20%	+ 30%

Donegal CC have adopted a conservative and proactive approach to climate change adaptation, by adopting the High-End Future climate change scenario in the delineation of Flood Zones. Donegal CC has taken the stance that as there is an increasing likelihood that Irelands climate will be similar to that depicted in the High-End Future climate change scenario by the year 2100, it is prudent to consider the HEFS parameters when planning for vulnerable infrastructure and developments.

Due to the uncertainty of the potential effects of climate change, this SFRA sets out recommendations in line with the precautionary approach adopted by the Guidelines in terms of managing the effects of climate change. These include:

- Recognising that significant changes in the flood extent may result from an increase in rainfall or tide events and, accordingly, adopt a cautious approach to zoning land in transitional areas.
- Ensuring that the finished levels of structures are designed to protect against flooding such that flood defences, land raising, and ground floor levels are sufficient to cope with the effects of climate change over the lifetime of the development.
- Ensuring that both the structures designed to protect against flooding and the protected development are capable of adaptation to the effects of climate change when there is more certainty about the effects and when there is still time for such adaptation to be effective.

3.9 Stages and Scales of Flood Risk Assessment

3.9.1 Stages of FRA

Flood risk assessments are typically undertaken over three stages, in order of increasing detail, as described in Table 3.5. Progression to a more detailed stage depends on the outcomes of the previous stage. This staged approach ensures that the level of assessment undertaken is appropriate for the scale and nature of the flood risk issues, site or area, and type of development proposed. It also prevents unnecessary flood modelling and development of mitigation and management measures.

Table 3.5: Stages of Flood Risk Assessment

Stage	Purpose
Stage 1: Flood Risk Identification	To identify whether there may be any flooding or surface water management issues relevant to a plan area or proposed development site that may warrant further investigation.
Stage 2: Initial Flood Risk Assessment	To confirm sources of flooding that may affect a plan area or proposed development site and to appraise the adequacy of the existing flood risk information. If necessary, to determine what surveys and modelling approach are appropriate to match the spatial resolution required and complexity of the flood risk issues identified.

Stage	Purpose
Stage 3: Detailed Flood Risk Assessment	To provide a quantitative assessment of flood risk to a proposed or existing development, the effect of the development on flood risk elsewhere, and the effectiveness of any proposed mitigation measures. Typically involves the construction of a hydraulic model that covers a wide enough area to capture catchment-wide impacts and hydrological processes.

3.9.2 Scales of FRA

There are three scales of flood risk assessment described in the OPW Guidelines, summarised in Table 3.6.

Table 3.6: Scales of Flood Risk Assessment

Scale	Purpose	Responsibility
Regional Flood Risk Appraisal (RFRA)	• To appraise the source and significance of all types of flood risk in a region based on readily derivable information to inform the regional planning guidelines and influence spatial allocations for growth in housing and employment. • To identify areas where more detailed studies are required or where flood risk management measures may be required at a regional level to support the proposed growth.	Regional Authorities
Strategic Flood Risk Assessment (SFRA)	• To provide a broad assessment of all types of flood risk in the area to inform strategic land use planning decisions and to identify opportunities for reducing flood risk. • Typically involves up to a Stage 2 – Initial Flood Risk Assessment. • A site-specific flood risk assessment would be recommended where the initial flood risk assessment demonstrates the potential for a significant level of flood risk or where there is conflict with the vulnerability of proposed development.	Local Authorities
Site-specific Flood Risk Assessment (SSFRA)	• To identify and assess all types of flood risk for a proposed new development and to assess the potential effects of climate change, the impact of development on flooding, and residual risks. • To propose appropriate site management and mitigation measures to reduce flood risk to an acceptable level. • If stages 1 and 2 of assessment have been undertaken to appropriate levels of detail, it is likely that the SSFRA will require detailed channel and site surveys and flood modelling.	Planning Applicants

Further details relating to Development Management aspects of SSFRAs are outlined in Section 6.

3.10 The Sequential Approach and Justification Test

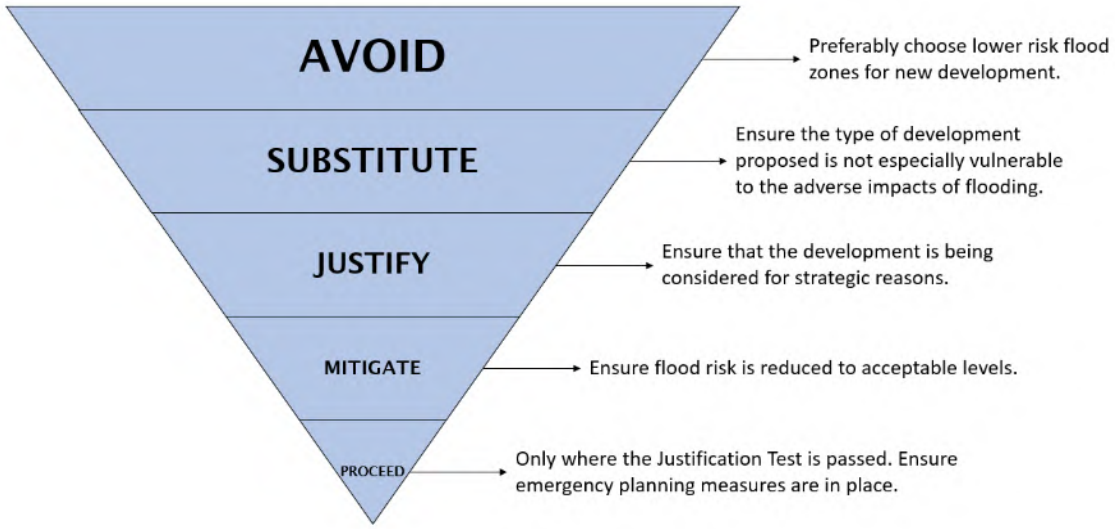
3.10.1 Sequential Approach

The OPW Guidelines recommend a sequential approach to planning to ensure the core objectives outlined in Section 3.2 are implemented. It is of particular importance at the plan making stage but is also applicable in the layout and design of development at the development management stage. The broad philosophy of the sequential approach in flood risk management from the OPW Guidelines is shown in Figure 3.2.

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

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

Figure 3.2: The Sequential Approach



3.10.2 Justification Test

The Justification Test has been designed to rigorously assess the appropriateness, or otherwise, of particular developments that, for the reasons outlined above, are being considered in areas of moderate or high flood risk. The test is comprised of two processes:

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

Table 3.7 is a matrix of receptor vulnerability versus Flood Zone to illustrate appropriate development and scenarios where development is required to meet the Justification Test.

Table 3.7: Vulnerability and Flood Zone Matrix for Justification Test

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

3.10.3 Plan Making Justification Test

The Plan Making Justification Test should be carried out as part of the SFRA using mapped Flood Zones. It applies where land zonings have been reviewed with respect to the need for development of areas at a high or moderate risk of flooding for uses which are vulnerable to flooding and which would generally be inappropriate, as set out in Table 3.2, and where avoidance or substitution is not appropriate. Where land use zoning objectives are being retained, they must satisfy all of the following criteria as per Table 3.4 of the OPW Guidelines included as Table 3.8.

Table 3.8: Plan Making Justification Test

No.	Criteria
1	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
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: • Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement • Comprises significant previously developed and/or under-utilised lands • Is within or adjoining the core of an established or designated urban settlement • Will be essential in achieving compact and sustainable urban growth • 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 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.

In cases where existing zoned lands are discovered to be within flood zones, the Plan Making Justification Test has been applied, and it is demonstrated that it cannot meet the specified requirements it is recommended that planning authorities reconsider the zoning by implementing the following:

- Remove the existing zoning for all types of development on the basis of the unacceptable high level of flood risk
- Reduce the zoned area and change or add zoning categories to reflect the flood risk
- Replace the existing zoning with a zoning or a specific objective for less vulnerable uses
- Prepare a local area plan informed by a detailed flood risk assessment to address zoning and development issues in more detail and prior to any development

If the criteria of the Justification Test have been met, design of structural or non-structural flood risk management measures as prerequisites to development in specific areas, ensuring that flood hazard and risk to other locations will not be increased or, if practicable, will be reduced. The mitigation measures are required prior to development taking place.

3.11 Strategic Flood Risk Assessment

The purpose of this report is to carry out an SFRA at Plan Area scale. The following detailed requirements are set out in the Technical Appendices of the OPW Guidelines and have been undertaken where relevant information is available:

- Identify principal rivers, sources of flooding and produce Flood Zone maps for across the local authority area and in key development areas.
- An appraisal of the availability and adequacy of the existing information.
- Assess potential impacts of climate change to demonstrate the sensitivity of an area to increased flows or sea levels.
- Identify the location of any flood risk management infrastructure and the areas protected by it and the coverage of flood-warning systems.
- Consider, where additional development in Flood Zone A and B is planned within or adjacent to an existing community at risk, the implications of flood risk on critical infrastructure and services across a wider community-based area and how the emergency planning needs of existing and new development will be managed.
- Identify areas of natural floodplain, which could merit protection to maintain their flood risk management function as well as for reasons of amenity and biodiversity.
- Assess the current condition of flood-defence infrastructure and of likely future policy with regard to its maintenance and upgrade.
- Assess the probability and consequences of overtopping or failure of flood risk management infrastructure, including an appropriate allowance for climate change.
- Assess, in broad terms, the potential impact of additional development on flood risk elsewhere and how any loss of floodplain could be compensated for.
- Assess the risks to the proposed development and its occupants using a range of extreme flood or tidal events.
- Identify areas where site-specific FRA will be required for new development or redevelopment.
- Identify drainage catchments where surface water or pluvial flooding could be exacerbated by new development and develop strategies for its management in areas of significant change.
- Identify where an integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.
- Provide guidance on appropriate development management criteria for zones and sites.

4 STAGE 1 – FLOOD RISK IDENTIFICATION

4.1 Introduction

The Flood Risk Identification stage involves a review of available flood risk information and identification of any flooding or surface water management issues in the Plan Areas that warrant further investigation. Following the guidance set out in the OPW Guidelines, both primary and secondary sources of flood risk information have been used to inform this SFRA.

4.2 Primary Sources of Flood Risk Information

Table 4.1 lists the primary sources of flood risk information in chronological order. The flood zones adopted as part of this SFRA are as defined in the Donegal County Development Plan 2024-2030 and associated SFRA. The zones are primarily dependent upon the CFRAM and NCFHM information, however the Donegal County Development Plan 2024-2030 and associated SFRA should be referred to as the source and for further information.

Table 4.1: Sources of Primary Flood Information Summary

Information Source	Year Published	Flooding Type
Irish Coastal Protection Strategy Study (ICPSS)	2013	Coastal
Catchment Flood Risk Assessment and Management (CFRAM) Study	2015 / 2016	Fluvial, coastal
Seven Strategic Towns Local Area Plan Strategic Flood Risk Assessment 2018-2024	2018	Various
GSI Groundwater Flooding	2020	Groundwater
National Indicative Fluvial Mapping (NIFM)	2021	Fluvial
National Coastal Flood Hazard Mapping (NCFHM)	2021	Coastal
Donegal County Development Plan Strategic Flood Risk Assessment 2024-2030	2024	Fluvial, coastal
Past Flood Events Mapping	Historical / Ongoing	Various

4.3 Irish Coastal Protection Strategy Study (ICPSS)

The Irish Coastal Protection Strategy Study (ICPSS) was a national study commissioned by the OPW in 2003 and completed in 2013 that provided strategic-level flood hazard maps and coastal erosion maps for the Irish coastline. The purpose of the ICPSS was to support local authorities in decision-making related to how best to manage risks associated with coastal flooding and coastal erosion.

Strategic- / national-scale flood extent and depth maps were produced for 0.5% and 0.1% AEP flood events for the present day scenario and two future scenarios (i.e., the MRFS and HEFS). Aerial photographic records of the Irish coastline from 1973-75, 2000, and 2006 were used as the primary basis for coastal erosion assessment and mapping.

The ICPSS is effectively superseded by the Irish Coastal Wave and Water Level Modelling Study (ICWWS) which was mapped as the National Coastal Flood Hazard Mapping (NCFHM) 2021 project.

4.4 Catchment Flood Risk Assessment and Management (CFRAM) Study

As part of the OPW's CFRAM programme, flood extent, depth, and risk maps (generally referred to as 'CFRAM maps') were published in 2015 / 2016 for areas identified by the Preliminary Flood Risk Assessment (PFRA) as being at potentially significant risk of flooding. One of the main purposes of the detailed CFRAM flood maps was to assist Local Authorities in planning and development management.

The CFRAM flood extent maps show the estimated extents, peak water levels, and peak flows associated with flooding from modelled river reaches, estuaries, and coastlines, taking account of flood defences. Flood maps were produced for a range of flood events (10%, 1%, and 0.1% AEP) for the present-day scenario and two future scenarios (the MRFS and HEFS). Flooding from other sources has typically not been considered as part of the CFRAM flood mapping. The CFRAM study also models an undefended scenario, and these extents have been utilised for Flood Zone mapping per the OPW Guidelines.

The Plan Areas are within several areas of detailed modelling as undertaken by the CFRAM Study data and is both fluvially and coastally mapped. CFRAM flood data was provided by the OPW, via Donegal CC, including climate change flood extents (MRFS and HEFS). CFRAM mapping is available for the Plan Areas as follows:

- Carndonagh: Fluvial only
- Bridgend: Fluvial & Coastal
- An Clochán Liath (Dungloe): Fluvial & Coastal
- Killybegs: Fluvial & Coastal
- Donegal Town: Fluvial & Coastal
- Ballyshannon: No CFRAM mapping available
- Buncrana: Fluvial & Coastal
- Letterkenny: Fluvial & Coastal
- Ballybofey-Stranorlar: Fluvial

The CFRAM fluvial and undefended extents are the best available. While the coastal extents are based on superseded ICPSS predicted water levels, the CFRAM coastal modelling includes combined tidal-fluvial scenarios that are important due to the complex tidal influence of major and minor watercourse and tributaries through the settlements. It is understood that the CFRAM coastal extents are combined with fluvially-dominated and undefended scenarios, along with updated NCFHM coastal data in preparation of the Donegal CDP flood zones as adopted herein.

4.5 Seven Strategic Towns Local Area Plan SFRA 2018-2024

As part of the preparation of the previous Seven Strategic Towns Local Area Plan 2018-2024, a Strategic Flood Risk Assessment was carried out which included flood extents based upon the best available mapping at the time, including CFRAM, OPW Preliminary Flood Risk Assessment (PFRA) extents (now considered superseded) and the Irish Coastal Protection Strategy Study (ICPSS) extents (now superseded by the updated NCFHM).

Recent guidance from the OPW on the PFRA flood mapping and ICPSS coastal flood extents indicates that the datasets are considered superseded by more recent data sources (outlined in subsequent sections) and as such, should no longer be used, so are not referred to / used in this assessment, nor in the delineation of the updated flood zones. As such, additional areas of flood risk may be identified in the 2018 flood zones attributable to these sources.

A ground-truthing exercise was undertaken as part of the Seven Strategic Towns 2018-2024 SFRA, including a walkover survey, along with consultation with municipal district engineers was carried out at a number of selected locations throughout the Settlement Areas to help assess flood risk. Historical flood records, alluvium soils data, historic OSI mapping, and OPW drainage information were used to validate the 2018 - 2024 flood zones, identify flood sources and areas vulnerable to flood damage. Further information is available as part of the original 2018 SFRA report.

This established flood data which include invaluable local knowledge, while not forming part of the Flood Zone mapping produced as part of this assessment, has been incorporated into the flood information mapping presented in Appendix C. These Flood Information maps are based on a wide variety of sources, of variable confidence, and do not constitute Flood Zones, but are provided for information only as additional for consideration as part of future site-specific flood risk assessments.

The proposed land use zonings as set out in the Proposed Variation No. 1 have taken regard to the findings of the Seven Strategic Towns 2018-2024 SFRA.

4.6 Geological Survey Ireland (GSI) Groundwater Flood Mapping

In response to the extensive groundwater flooding that occurred in the winter of 2015 / 2016, Geological Survey Ireland (GSI) undertook the 'GWFlood' project to address the lack of data on groundwater flooding and fit-for-purpose flood hazard maps necessary to manage groundwater flood risk in vulnerable communities. Project outputs included the Groundwater Flood Maps Viewer, which shows historic and predictive (10%, 1%, and 0.1% AEP) groundwater flood extents, a Groundwater Level Data Viewer, which shows live groundwater hydrometric data, and a comprehensive project report.

GSI Groundwater Flooding Probability Maps do not show any areas of predicted groundwater flood risk within the Plan Areas. This information is available through GSI, and through the OPW at floodinfo.ie. Groundwater flooding is not considered within the Flood Zone mapping.

4.7 National Indicative Fluvial Mapping (NIFM)

The National Indicative Fluvial Mapping (NIFM) was published by the OPW in 2021. It shows the extent of flooding from modelled river reaches for catchments greater than 5 km^2 in areas that were not previously mapped as part of the CFRAM programme. Flood mapping was prepared for a range of flood events (5%, 1%, and 0.1% AEP) for the present-day scenario and two future climate change scenarios (the MRFS and HEFS).

NIFM User Guidance Notes state that the maps only provide an indication of areas that may be prone to flooding. They are not necessarily locally accurate and should not be used as the sole basis for defining the Flood Zones nor for making decisions on planning applications. They are by definition of a national indicative quality.

Flood outlines are suitable for use in the Stage 1 Flood Risk Assessment and initial Flood Zone mapping but not suitable for use in site specific flood risk assessment. Where a land zoning allocation is being considered within or adjacent to an initial Flood Zone defined by NIFM flood extents then additional data / information source will be required to form the basis of a Stage 2 Flood Risk Assessment.

NIFM flood data represents best available information for flooding from fluvial sources where no more detailed regional or local-quality data exists.

The Donegal County Development Plan 2024-2030 notes "The NIFM has been used as the basis of defining flood zones where neither the CFRAMS nor NCFHM is available. Settlements where a portion of the flood extent mapping is derived from NIFM are listed in Table 3-1 below. Any development proposed within these settlements shall be subject to a site-specific flood risk assessment in accordance with the OPW Guidelines to confirm flood risk on site".

4.8 National Coastal Flood Hazard Mapping (NCFHM) 2021

The National Coastal Flood Hazard Mapping (NCFHM) 2021 project was prepared and published by the OPW Coastal and Flood Risk Management Data Management Sections. The NCFHM coastal flood extents are based on the estimated extreme water level outputs from Phase 1 of the Irish Coastal Wave and Water Level Modelling Study (ICWWS) published in 2018.

The aim of this project is to produce updated national scale coastal flood extent and depth maps for the 50%, 20%, 10%, 5%, 2%, 1%, 0.5% and 0.1% Annual Exceedance Probabilities (AEPs) for the present day scenario and for the Mid-Range Future Scenario (MRFS) and High End Future Scenario (HEFS) which represent a 0.5m and 1.0m increase in sea level respectively (as well as two more extreme high end scenarios which are outside the scope of this assessment). As the NCFHM is understood to be based on the ICWWS data, ICWWS flood levels form the basis of this assessment.

The maps prepared are predictive, as they provide predicted flood extent and depth information for a 'design' flood event that has an estimated probability of occurrence (e.g., the 0.5% AEP event), rather than information for floods that have occurred in the past. 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 OPW Guidelines. The NCFHM maps are based on more up-to-date estimates of extreme coastal levels than those used for the CFRAM coastal maps (based on superseded 2013 ICPSS data).

The maps have been produced at a strategic / national level to provide an overview of coastal flood hazard in Ireland, and minor or local features may not have been included in their preparation. Flood outlines are suitable for use in Flood Zoning but not suitable for use in site specific flood risk assessment.

The NCFHM coastal flood extents are based on the estimated extreme water level outputs from Phase 1 of the Irish Coastal Wave and Water Level Modelling Study (ICWWS) published in 2018, and supersede the findings of the 2013 Irish Coastal Protection Strategy Study (ICPSS) and PFRA.

NCFHM flood data represents best available information for flooding from coastal sources.

4.9 Donegal County Development Plan SFRA Assessment 2024-2030

As part of the preparation and adoption of the Donegal County Development Plan 2024-2030, a Strategic Flood Risk Assessment was prepared. The SFRA is set out as a Stage 1 Flood Risk Identification, "undertaken to identify any flooding or surface water management issues within the County that may warrant further investigation. As part of this stage the most up to date available data at the time of preparation was acquired from the Office of Public Works (OPW) and Donegal County Council". These remain the best available sources.

Flood zones for the county were defined, and have been adopted herein. Per Section 3.4 of the Strategic Flood Risk Assessment for the Donegal County Development Plan 2024-2030, the "flood zone maps are primarily derived from the CFRAMS and NCFHM mapping". However, it is clear that in some areas, including the Ballyshannon Settlement Area, the NIFM fluvial flood extents have been adopted in the absence of CFRAM mapping.

As set out in in the SFRA, Donegal CC has taken the stance that as there is an increasing likelihood that Irelands climate will be similar to that depicted in the High-End Future climate change scenario by the year 2100, it is prudent to consider the HEFS parameters when planning for vulnerable infrastructure and developments. As such, the flood zones include the HEFS climate change projections.

4.10 Recorded Flooding

4.10.1 OPW Past Flood Events

The OPW has recorded and mapped 'Past Flood Events' based on available information including flood reports, news articles, photos, Council meeting minutes and other archived information. Historical records are mostly anecdotal and incomplete but are useful for providing background information. The record is not an exhaustive record of all flooding that has occurred in the Plan Area and historic flood events will have occurred that are not captured by this dataset. These records have been reviewed as part of the SFRA along with historic flood event records and reports provided by Donegal CC.

It is noted that past flood event mapping is not consistent or comprehensive and are not a component of the flood outlines used for development of Flood Zone mapping for the SFRA. Mapping of single or recurring past flood events may provide useful additional information as an indicator of a risk of flooding on land, and information on the scale and nature of flood risk in a particular location that can be used to inform site-specific flood risk assessment, but records of past flood events should not be taken as the only source of data in assessing flood risk.

There are no OPW floodinfo.ie records of flooding within the amendment land parcels in Buncrana, Letterkenny, or Stranorlar. As shown in Figure 4.2, there are no recorded flood events within Ballyshannon settlement boundary.

Note that OPW floodinfo.ie records are continually updated and those presented are the data available at time writing. More information can be found on floodinfo.ie.

Figure 4.1: An Clochán Liath (Dungloe) Map of Past Flood Events

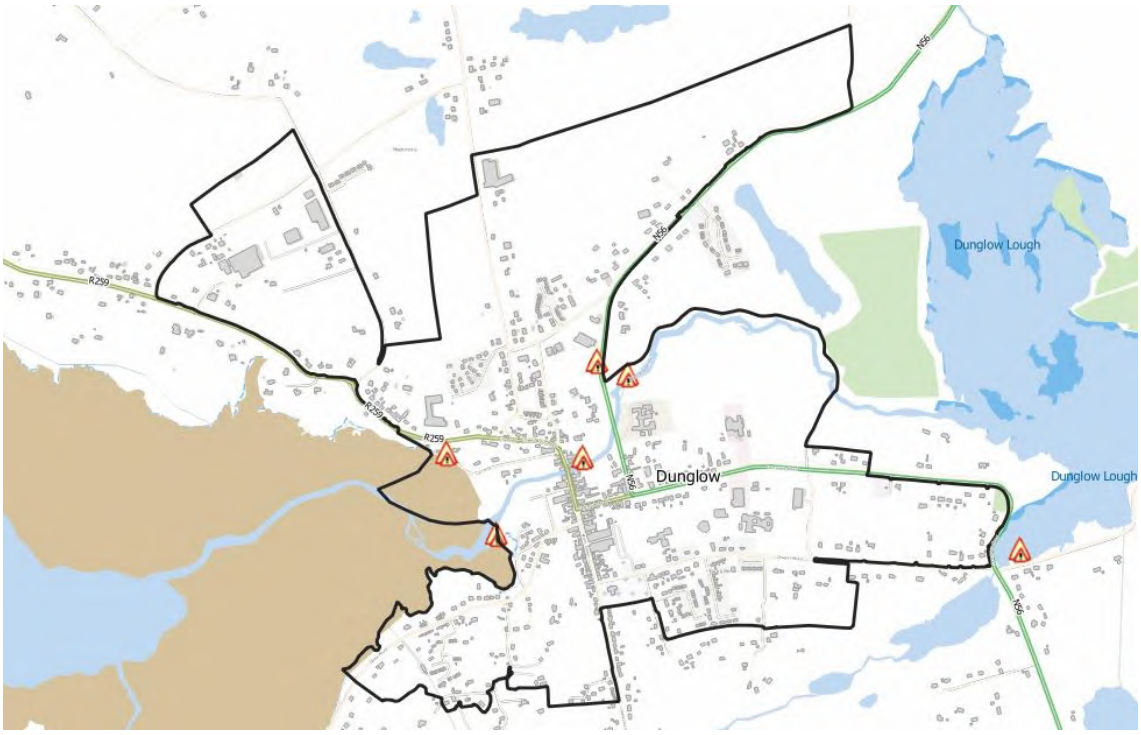


Table 4.2: An Clochán Liath (Dungloe) List of Past Flood Events

Flood ID	Flood Source	Date	Location	Description	*Within Flood Zone?*
13869	-	Recurring	Dungloe North	Approximate Point	*Yes*
13931	-	Recurring	Dungloe Centre	Approximate Point	*Yes*
13928	-	Recurring	Dungloe South West	Approximate Point	*Yes*
4117	River	Recurring	Dungloe 2	River Dungloe overflows its banks after heavy rain every year. The road is liable to flood occasionally.	*Yes*
4115	Coastal/ Estuarine Waters	Recurring	Dungloe 1	High Tides once or twice a year floods low lying land. Road is liable to flood and properties may be affected.	*Yes*

Figure 4.2: Ballyshannon Map of Past Flood Events



Figure 4.3: Bridgend Map of Past Flood Events



Table 4.3: Bridgend List of Past Flood Events

Flood ID	Flood Source	Date	Location	Description	*Within Flood Zone?*
1418	River	15/01/1999	Skeoge Bridgend	Heavy rain severe flooding occurred in Bridgend, Co. Donegal. The flood waters severely affected two shops, one with dwelling house and garden attached, an amusement arcade and adjacent low lying ground.	*Yes*
12744	River	2013 (undated flood)	Bridgend	No data	*Yes*
4011	River	Recurring	Skeoge Bridge End 1	River Skeoge overflows its banks every year after heavy rain. The road is liable to flood.	*Yes*
4012	Runoff	Recurring	Bridge End 2	Runoff from high ground causes flooding after very heavy rain approximately once every 2 years. The road is liable to flood.	*No*

Figure 4.4: Carndonagh Map of Past Flood Events

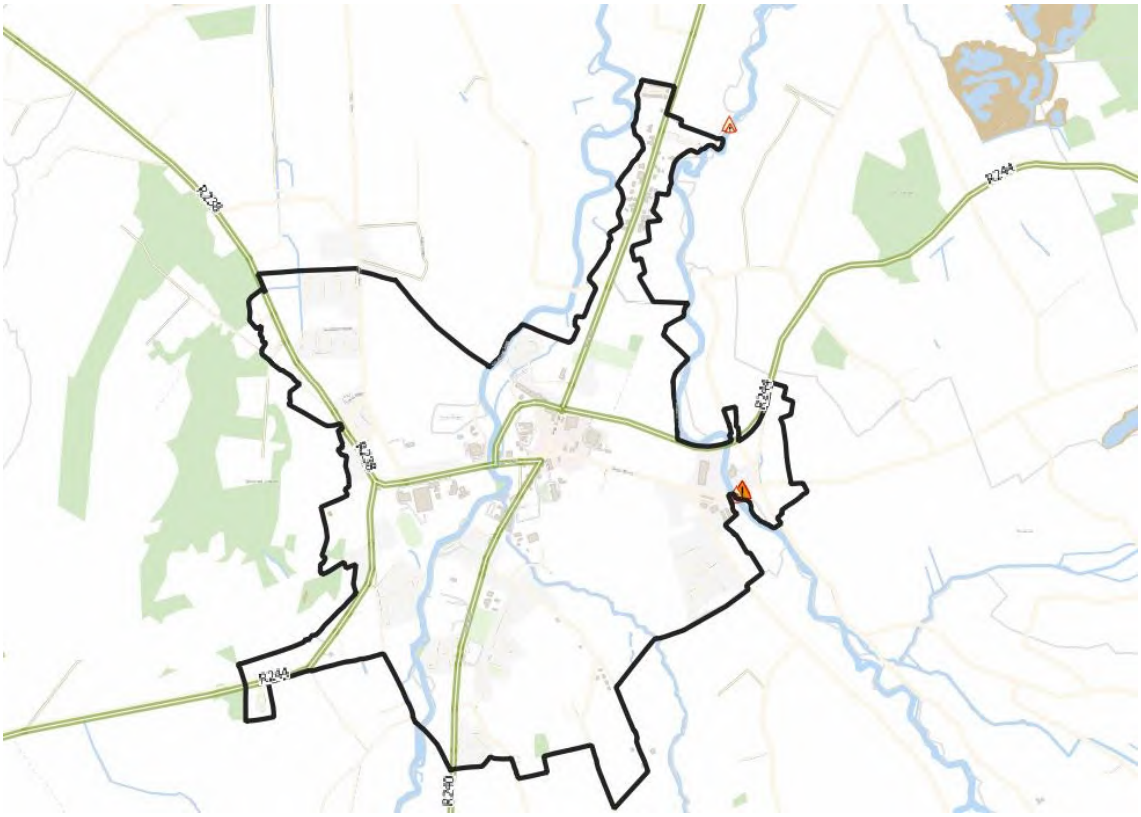


Table 4.4: Carndonagh List of Past Flood Events

Flood ID	Flood Source	Date	Location	Description	Within Flood Zone?
13538	River	22/08/2017	Carndonagh South	Approximate point	*Yes*
13539	River	22/08/2017	Carndonagh Centre	Approximate point	*Yes*
13886	River	Recurring	Carndonagh Centre	Approximate point	*Yes*
11902	River	17/05/2025	Simpsons Supermarket at Bothar an Teampail, Cardonagh	Cause of the flood was embankment failure. The flooding occurred in the Glennagannon catchment on the river Glennagannon. The Glennagannon River burst its banks upstream and flooded the road causing it to collapse and then flowed down the roadway to the low point and ponded at Simpsons Supermarket and Simpsons Bar. Flood depth 0.2m.	*Yes*
3966	River	Recurring	Glennagannon Carndonagh 2	River Glennagannon overflows its banks every year after heavy rain. The road is liable to flood.	*Yes*

Figure 4.5: Donegal Town Map of Past Flood Events

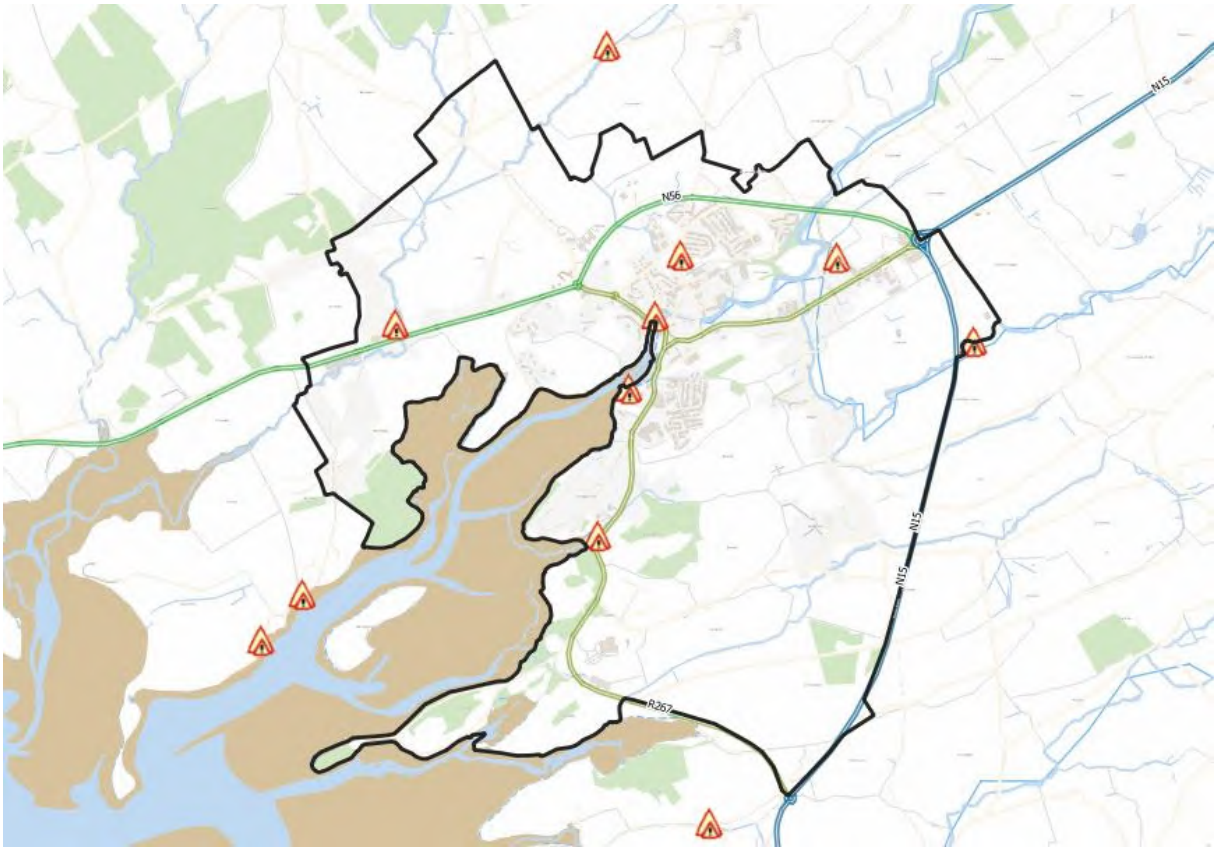


Table 4.5: Donegal Town List of Past Flood Events

Flood ID	Flood Source	Date	Location	Description	*Within Flood Zone?*
4154	River	Recurring	Eske Tyrconnell	River Eske overflows its banks through a combination of heavy rain and high tides once every 3 years. Streets flooded are, New Row, Waterloo Place, Castle Street. Properties are also affected.	*Yes*
4155	River	Recurring	Drumrooske Estate	Tributary of River Eske overflows its banks through a combination of heavy rain and high tides once every 3 years. Roads and properties are affected.	*Yes*
13672	River	04/10/2019	St. John Bosco Centre at Drumrooske	Approximate Point	*Yes*
14092	River	Recurring	Donegal Town	Approximate Point	*Yes*
13889	River	Recurring	Donegal	Approximate Point	*Yes*
13671	River	04/10/2019	Clareden Drive, Donegal Town	Approximate Point	*Yes*

Flood ID	Flood Source	Date	Location	Description	*Within Flood Zone?*
4156	River	Recurring	Eske Clareden Drive, Donegal	River Eske overflows its banks through a combination of heavy rain and high tides once every 3 years. Streets flooded are, New Row, Waterloo Place, Castle Street. Properties are also affected.	*Yes*
4260	River	Recurring	Drumenny Drumrat	River Drumenny overflows its banks after heavy rain every year.	*Yes*

Figure 4.6: Killybegs Map of Past Flood Events



Table 4.6: Killybegs List of Past Flood Events

Flood ID	Flood Source	Date	Location	Description	*Within Flood Zone?*
4160	River	Recurring	Killybegs	A combination of heavy rain and high tides causes flooding every year. The road is liable to flood and properties are affected.	*Yes*

4.10.2 Internet / Media / Background Search

A media search comprising internet media and archived newspaper articles found the following evidence of flooding within the Settlement Areas. This list is not exhaustive and are generally encompassed within OPW flood records:

- evidence of flooding at a number of private properties in Ballyshannon, one on Main Street, others on The Rock on 7th August 2021[2].
- evidence of flooding occurring in Bridgend on 2nd January 2018[3]. Further evidence of flooding in Bridgend was found on 23rd August 2017, after torrential rain[4].
- evidence of flooding occurring in Carndonagh on 22nd August 2017[5], resulting in livestock loss.
- evidence of flooding occurring at Clareden Drive in Donegal Town on 23rd November 2024[6]. Further evidence of flooding at Clareden Drive in Donegal Town was found on 25th August 2024, due to heavy rainfall over the preceding days and weeks, which had increased the volume and flow speed of the River Eske, which runs along the lower end of Clareden Drive[7].
- evidence of flooding occurring at Bridge Street in Killybegs on 24th November 2024[8], where floods hit their peak when water rose to highs of 1.2m. Further evidence of flooding in several homes and businesses were found on 5th October 2015 after the river burst its banks[9].

4.10.3 Donegal CC Records

In addition to the records kept by the OPW, Donegal CC have noted the following additional flood information relevant to the Plan Areas.

4.10.3.1 Donegal Town

Table 4.7 sets out Donegal CC records of flooding during extreme storm events in recent years in Donegal Town.

Table 4.7: Donegal CC Flood Record for Donegal Town

Event name	Date	No. of Properties Flooded		No. of Properties almost Flooded	
		Residential	Commercial	Residential	Commercial
Storm Abigail	15.11.15	10	3	5	7
Storm Desmond	5.12.15	10	3	5	7
Storm Lorenzo	2.10.19	13	9	6	6
Storm Barra	8.12.21	0	0	7	0

2 https://www.facebook.com/dalysdonegal/posts/flash-flooding-in-garrison-belleek-ballyshannon-bundoran-and-kinlough-areasby-mi/334491698108997/ [accessed 2nd September 2025]
3 https://www.facebook.com/DonegalWeatherC/posts/flooding-at-bridge-end-and-burt-donegal-very-bad-flooding-between-bridgend-and-b/1418271218282623/ [accessed 2nd September 2025]
4 https://www.irishmirror.ie/news/irish-news/north-west-ireland-wakes-up-11036632 [accessed 2nd September 2025]
5 https://www.donegalweatherchannel.ie/news/2018/08/08/22-the-inishowen-donegal-derry-flooding-1-year-anniversary-today [accessed 2nd September 2025]
6 https://www.donegallive.ie/news/local-news/1662967/storm-bert-donegal-towns-clareden-drive-hit-by-flooding-yet-again.html [accessed 2nd September 2025]
7https://www.donegallive.ie/news/local-news/1588001/donegal-town-residential-area-hit-by-floods-as-wind-and-rain-pound-the-county.html? [accessed 2nd September 2025]
8 https://www.thesun.ie/news/14245501/clean-donegal-extreme-floods-victims/ [accessed 2nd September 2025]
9 https://www.irishexaminer.com/news/arid-30808590.html [accessed 2nd September 2025]

4.10.3.2 Killybegs

The following summarises Donegal CC records of a flood event in Killybegs on 23rd November 2024:

- Estimate Date and Time of Peak of Flood: 23/11/2024 peaking between 6am (5:43 first Fire Service call) and 9am.
- Serious in property flooding at Killybegs: Centred on Bridge Street within the town and at a bridge upstream on the same watercourse.
- Other locations in Donegal Municipal District: Pettigo, Dunkineely (F94 E4C1 nearly flooded), Dumacrin Road (Bundoran), Ardara (Bakery), Clareden Drive (Donegal Town) and roads at Bruckless, Barney, and L1125 near Carrick.
- Source of flood water: There was also snow laying on the higher ground around the upstream ends of the various branches of the stream. Very heavy sleet was noted in the area by night crews on winter maintenance and this transitioned to persistent heavy rainfall along with an increase of temperature which melted the snow and swelled the stream. Given sleet and snow melt are also factors, exact rainfall depth maybe not be critical/fully representative.
- High flows due to heavy rainfall and snow melt first overtopped a culvert on a local road upstream of the town blocking access for cars (passable in higher vehicle) to a property in Croaghlin, at F94 K0D5. The watercourse does not have a formal name, but was referred to as the Drumbeagh in CFRAM and is referred to as IE_NW_37C080400 on EPA Blueline Network. The catchment upstream of the town is very steep in places rising from sea level at Shore Rd to over 100m altitude at the water treatment works, a distance of approximately 2km as the crow flies. Thus, the response/time to peak was very rapid. The event coincided with low tide which occurred at 05:11 with a level of 1.71m. This fact combined with the blockage noted confined the worst impacts to the Bridge St area.

4.10.3.3 Ballybofey-Stranorlar

The following summarises Donegal CC records of flooding for a site in Ballybofey-Stranorlar:

- When Donegal County Council prepared the 'Seven Strategic Towns Local Area Plan' (SSTLAP) in 2018, a Strategic Flood Risk Assessment was carried out. The SSTLAP included a Local Area Plan for Ballybofey-Stranorlar and the zoning map was prepared having regard to, inter alia, the findings of the SFRA.
- The flooding consultants at that time carried out a number of 'ground-truthing' exercises and identified a portion of lands at Mullindrait as being within Flood Zone A, due to the presence of a pool of standing water on the northern part of the site (note: this flood zone does not appear on any of the OPW flood maps).
- This area of flooding is not shown as fluvially or coastally influenced by OPW mapping, and the extent or source of flooding was not identified outside of this visual inspection.
- Review of historical aerial imagery indicates that the pool of water in question has only emerged in recent years and thus may be associated with a drainage issue on the lands. This appears to be confirmed by a 2025 engineer's report. It appears that the recent drainage works undertaken on this site (as detailed in the report) have resulted in the disappearance of the standing water.
- Donegal CC have amended zoning considering this further information.

4.11 Secondary Sources of Flood Risk Information

4.11.1 OPW Arterial Drainage Schemes

Arterial Drainage Schemes were carried out under the Arterial Drainage Act, 1945 to improve land for agriculture and to mitigate flooding. Rivers, lakes weirs and bridges were modified to enhance conveyance, embankments were built to control the movement of flood water and various other work was carried out under Part II of the Arterial Drainage Act, 1945.

The purpose of the schemes was to improve land for agriculture, to ensure that the 3-year flood was retained in bank this was achieved by lowering water levels during the growing season to reduce waterlogging on the land beside watercourses known as callows. Flood protection in the benefiting lands was increased as a result of the Arterial Drainage Schemes.

The following Arterial Drainage Scheme (ADS) areas are located within the settlement boundaries:

- Carndonagh: N/A
- Bridgend: Benefiting areas and an Arterial Drainage Scheme channel located within settlement bounds (Burnfoot/Skeoge scheme)
- An Clochán Liath (Dungloe): N/A
- Killybegs: N/A
- Donegal Town: N/A
- Ballyshannon: N/A

Under Section 37 of the Arterial Drainage Act 1945, the Office of Public Works (OPW) is statutorily obliged to maintain all rivers, embankments and urban flood defences on which it has executed works since the 1945 Act.

4.11.2 OPW Flood Relief Schemes

Areas that benefit from an existing flood relief scheme or flood defences have a reduced probability of flooding but can be particularly vulnerable due to the speed of flooding when overtopping or a breach or other failure takes place.

The OPW is responsible for leading and coordinating the implementation of localised flood relief schemes to provide flood protection for cities, towns, and villages, either directly or in association with relevant Local Authorities.

The location of OPW 'Minor Works' schemes can be viewed / accessed via floodinfo.ie. This database will be updated throughout the lifetime of the Plan. There are currently reported Minor Works schemes within Donegal Town, Letterkenny, Stranorlar-Ballybofey, Carndonagh and Bridgend, relevant to the Plan Area.

At present, there are no Flood Relief Schemes within the Plan Area. Donegal County Council have commenced a pilot for the data collection for the Donegal Town Flood Relief scheme prior to appointing a consultant to progress the scheme (see Objective DT-F-O-1 as set out in Table 2.2). As part of the Flood Risk Management Plan for the North Western River Basin, FRSs are proposed for Cardonagh (see Objective CN-F-O-1 as set out in Table 2.2) and Killybegs (see Objective KB-F-O-2 as set out in Table 2.2).

Any proposals for development should not prejudice any proposed Schemes to the benefit of the Plan Area.

4.11.3 Donegal CC Register of Flood Mitigation Works

Donegal CC and associated area engineers have provided the following information in relation to flood mitigation works within the Plan Areas:

In addition to the works undertaken as part of OPW Minor Works schemes, Donegal CC have undertaken works to improve drainage within the Plan Area; one example of additional works is installation of non-return valves on drainage network for Clareden Drive in Donegal Town undertaken without Minor Works funding.

4.12 Summary

In accordance with the OPW Guidelines, the flood information sources within the Plan Area have been identified. The findings of the Stage 1 assessment indicate that lands within the Plan Areas are at risk of flooding. Therefore, in accordance with the OPW Guidelines, a Stage 2 flood risk assessment, including Justification Test, should be carried out.

Table 4.8: Stage 1 Flood Risk Assessment Summary

Source / Pathway		Relevant to Plan Area?	Reason
Coastal		Yes	Flood mapping indicates that several of the settlement areas are affected by coastal flooding.
Fluvial	**Natural Floodplain**	Yes	Flood mapping indicates that all the settlements areas are affected by fluvial flooding.
	Flood Defence Failure	No	No significant Flood Relief Schemes have been prepared within the Plan Areas.
Pluvial / Surface Water		Yes	Pluvial flooding is likely to be a significant risk in discrete areas throughout the Plan Areas; however insufficient data is available to allow any spatial analysis of pluvial flood risk.
Urban Drainage		Possible	Flooding from urban drainage networks is likely to cause a significant risk developed / built up areas where extreme rainfall can overwhelm drainage network capacity.
Groundwater		Unlikely	GSI Groundwater Flood Mapping indicates that the Plan Areas are not at significant risk of groundwater flooding. Further assessment should be made at a site-specific level to ascertain the level of potential groundwater flood risk.
Canals/ Reservoirs / Impoundments		Possible	Impoundments (e.g. dam / reservoir in Ballyshannon) do exist in parts of the Plan Areas.

5 STAGE 2 – INITIAL FLOOD RISK ASSESSMENT

5.1 Introduction

A Stage 2 SFRA (initial flood risk assessment) was undertaken to:

- Confirm the sources of flooding that may affect lands within the Plan Areas
- Appraise the existing land zonings relative to the Stage 1 flood data / Flood Zone Maps
- Provide clarification on the requirement for a site-specific FRA and Justification Test, based on the proposed use and associated vulnerability of a land zoning

5.2 Fluvial / Coastal Flooding

Based on an assessment of the sources above, the Plan Areas are identified to be at risk of fluvial and coastal flooding. Flood Zones have been prepared using best-available fluvial and coastal data, as outlined in the Donegal County Development Plan 2024-2030 and associated SFRA (see Section 4.9), and adopted herein.

As per Section 3.6, as part of the Donegal County Development Plan 2024-2030, Donegal CC has taken a proactive approach to climate change adaption and includes the High-End Future Scenario for climate change in delineation of Flood Zones.

As provided for by measures integrated into both the Donegal County Development Plan 2022-2028, and the Proposed Variation No. 1, including the measures reproduced in Sections 2.4 and 6 of this report, new developments, including applications for development on previously developed lands within Flood Zone A or Flood Zone B and extensions of uses or minor development, and those within Benefitting Areas will be required to comply with requirements of the Planning System and Flood Risk Assessment Guidelines.

5.3 Pluvial / Surface Water and Urban Drainage

Pluvial flooding is likely to be a significant risk in discrete areas throughout the Plan Area; however insufficient data is available to allow any spatial analysis of pluvial flood risk. As outlined by the provisions reproduced in Section 6 of this report, pluvial flood risks shall be considered by any site-specific flood risk assessment undertaken at project level, in compliance with the Flood Risk Management Guidelines (see Policy 8.4).

As provided for by measures integrated into both the Donegal County Development Plan 2024-2030 and the Proposed Variation No. 1, including the measures reproduced in Sections 2.4 and 6 of this report, new developments will be required to incorporate the requirement for Sustainable Urban Drainage Systems (SuDS) where appropriate.

Flooding from urban drainage networks is likely to cause a risk to developed areas where extreme rainfall can overwhelm drainage network capacity.

5.4 Vulnerability Classifications

The Flood Zone maps included in Appendix A were prepared to assist with land use zoning decisions in areas that have been assessed as being at risk of flooding. Land use zonings for the Proposed Variation No. 1 have been overlain with Flood Zone mapping and Appendix B presents Justification Tests prepared by Donegal CC, where required, whereby land use zonings are located within an inappropriate flood zone, based on land use zoning vulnerability. Land use zoning vulnerability for the proposed Land Use Zonings within the Proposed Variation was agreed through consultation with Donegal CC, as outlined in the table below, and in following with the OPW Guidelines (see Section 3.7).

Table 5.1: Relevant Land Zoning Objectives and Flood Risk Vulnerability

Zoning	Flood Risk Vulnerability	Suitability
Established Development 1	Highly Vulnerable	Inappropriate in Flood Zone A and Flood Zone B
Established Development 2	Water Compatible*	Appropriate in any Flood Zone *Lands zoned Established Development 2 only support applications for appropriate minor development, with appropriate restrictions engrained in zoning definition. See GEN-F-P-2. Any proposal for development within Flood Zones A or B will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not be at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere.
New Residential (Phase 1)	Highly Vulnerable	Inappropriate in Flood Zone A and Flood Zone B
New Residential (Phase 2)	Highly Vulnerable	Inappropriate in Flood Zone A and Flood Zone B
Strategic Residential Reserve	Highly Vulnerable	Inappropriate in Flood Zone A and Flood Zone B
Urban Core	Highly Vulnerable	Inappropriate in Flood Zone A and Flood Zone B
Community Infrastructure	Highly Vulnerable	Inappropriate in Flood Zone A and Flood Zone B
Open Space and Recreation	Water Compatible	Appropriate in any Flood Zone Any proposal for development within Flood Zones A or B which involves changes in existing ground levels or provision of structures will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not be at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere.
Opportunity Site	Varies*	Individually reviewed and vulnerability determined based on Specific Opportunity Site Policies

Zoning	Flood Risk Vulnerability	Suitability
Business / Enterprise	Less Vulnerable	Inappropriate in Flood Zone A Any proposal for development within Flood Zone B which involves changes in existing ground levels or provision of structures will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not be at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere.
Local Environment 1	Highly Vulnerable	Inappropriate in Flood Zone A and Flood Zone B
Local Environment 2	Water Compatible*	Appropriate in any Flood Zone *Lands zoned Local Environment 2 only support applications for appropriate minor development, with appropriate restrictions engrained in zoning definition. See GEN-F-P-1. Any proposal for development within Flood Zones A or B will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not be at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere.
Transport and Utilities Infrastructure	Less Vulnerable	Inappropriate in Flood Zone A Any proposal for development within Flood Zone B which involves changes in existing ground levels or provision of structures will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not be at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere.
High Amenity	Water Compatible	Appropriate in any Flood Zone Any proposal for development within Flood Zones A or B will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not be at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere.
Na Cealla Beaga (Killybegs) Specific: Port / Harbour Related	Less Vulnerable	Inappropriate in Flood Zone A Any proposal for development within Flood Zone B which involves changes in existing ground levels or provision of structures will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not be at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere.
An Clochán Liath Specific: Marina	Water Compatible	Appropriate in any Flood Zone Any proposal for development within Flood Zones A or B will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not be at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere.

5.5 Justification Tests

5.5.1 Land Zonings

Land use zonings for Proposed Variation No. 1 have been provided by Donegal CC as part of the LAP SFRA process. The zoning objectives have been reviewed as part of the Stage 2 assessment. The review determines where Plan-Making Justification Tests (as per approach set out in Section 3.10.3) for areas identified to include 'inappropriate' land zonings relative to Flood Zones as per the guidance set out in the OPW Guidelines are required.

This process includes consideration of the specific land use zoning objectives as well as comment on the source / nature of flood risk. Recommendations are presented on how flood risk is proposed to be managed within the area identified.

5.5.2 Plan Making Justification Tests

Plan-making Justification Tests for all land use zonings identified as 'inappropriate' have been carried out by Donegal CC and are included in Appendix B. It is noted that in some cases, land use zoning parcels have been grouped by land use zoning type within the Justification Tests.

In line with the OPW Guidelines, 'inappropriate' land use zonings are:

- Highly vulnerable uses in Flood Zone A and Flood Zone B
- Less vulnerable uses in Flood Zone A

It is noted that water compatible uses are considered appropriate in any Flood Zone.

5.6 Summary of Settlement Initial Flood Risk Assessment

5.6.1 An Clochán Liath (Dungloe)

Dungloe is located at the mouth of an estuary, where the Dungloe River flows out of Dungloe Lough and into the sea. The west of the settlement area is identified as at risk of coastal flooding, with tidal influence extending up the Dungloe River and fluvial flood zones encompassing the north east portion of the settlement, namely the River Walk area and portions of the N56. Historical reports coincide with the identified areas of flood risk, where the River Dungloe is identified as overflowing its banks with the road occasionally liable to flood, and high tides inundating lands and roads.

Land use zonings for Proposed Variation No. 1 within Dungloe have been reviewed and amended to locate proposed development within appropriate flood zones. The River Walk area in the north has been appropriately designated Open Space and Recreation, allowing room for the river and floodplain. New Residential and Business enterprise land use zonings have been appropriately located in Flood Zone C. The lands along the estuary have been designated Open Space and Recreation and Marina, appropriately utilising this coastal area. Established Development 2 areas appropriately restrict development to appropriate minor works.

Designations within the flood zones for the Urban Core, Opportunity Site 1 and Opportunity Site 2 zonings have been subject to Plan-Making JTs, whereby DCC has had regard to all available flood information and the appropriate regeneration of the Urban Core. Appropriate restrictions and policies for development of these sites have been set out, and all other land use zonings are located in appropriate Flood Zones.

Flood Zone mapping for Dungloe is included in Appendix A (ref.: M02249-01_FL103-02).

5.6.2 Ballyshannon

Ballyshannon is bisected by the River Erne where it meets the sea at Donegal Bay conveying flows from Assaroe Lake, where the river is controlled by ESB dams. The Abbey River flows along the northern boundary of the settlement. There are no OPW reported flood events within the settlement bounds. It should be noted that fluvial flood mapping throughout Ballyshannon is based on the NIFM indicative mapping, and is therefore not suitable for site-specific analysis.

Ballyshannon is the only area within Proposed Variation No. 1 at potential risk of flood risk due to impoundments, given the water levels to the River Erne are controlled by the upstream ESB dam. The continued appropriate operation and maintenance of the dam and water levels are key to flood risk management within Ballyshannon.

Donegal Bay composes a significant portion of the western settlement boundary, while Assaroe Lake bounds the settlement to the east. Land use zonings for Proposed Variation No. 1 within Ballyshannon have been reviewed and amended to locate proposed development within appropriate flood zones. A conservative approach has been taken in the north of the settlement area, where low lying lands and areas associated with unmodelled watercourses have been designated Open Space and Recreation to avoid development within areas associated with potential flood risk. The mouth of the estuary, and banks of the River Erne and Abbey River area largely designated to restricted land uses appropriately. New Residential and Business enterprise land use zonings have been appropriately located in Flood Zone C, bar New Residential site NR 1.2.

New Residential site NR 1.2 has been zoned following the permission for development of a 34-unit Multiple Residential Development was permitted on the site under 2352008 following the submission of a detailed site-specific flood risk assessment (SSFRA). DCC have reviewed the proposed and consider that site-specific flood risk will be appropriately managed within the proposal as granted, and have further enforced the findings through Policy BN-H-P-2.

Designations within the flood zones for the Urban Core, Transportation and Infrastructure, and Opportunity Site 3 and Opportunity Site 4 zonings have been subject to Plan-Making JTs, whereby DCC has had regard to all available flood information and the appropriate regeneration of the Urban Core. Appropriate restrictions and policies for development of these sites have been set out. Transportation and Infrastructure zonings within the flood zone here are associated with the Cathleen Fall's ESB Hydro Electric Power Station, and are therefore appropriately located within the floodplain the River Erne and Assaroe Lake due to the nature of the infrastructure.

Flood Zone mapping for Ballyshannon is included in Appendix A (ref.: M02249-01_FL106-02).

5.6.3 Bridgend

Bridgend is located within the Lough Swilly catchment, as characterised by several watercourses, including the Skeoge River, passing through the settlement towards Lough Swilly in its transitional range. The settlement is within the benefiting areas of the Burnfoot/ Skeoge OPW Arterial Drainage Scheme, and appropriate access for the OPW to enact their duties to maintain the designated C1 and C1/3 Arterial Drainage Channel through the settlement should be enforced. The area is significantly impacted by the associated flood zones of these watercourses through the town centre. Additionally, an area of pluvial flooding is identified in the south of the settlement area by OPW historic records, where the road is liable to flooding. This area is appropriately restricted for development by the Local Environment 2 land use zoning.

Land use zonings for Proposed Variation No. 1 within Bridgend have been reviewed and amended to locate proposed development within appropriate flood zones. DCC have taken care to enact the sequential approach, largely designating the large areas of flood zone within the settlement as Local Environment 2 and Established Development 2, restricting development to appropriate minor works. New Residential and Opportunity Sites 2 and 3 land use zonings have been appropriately located in Flood Zone C.

Designations within the flood zones for the Urban Core and Opportunity Site 1 zonings have been subject to Plan-Making JTs, whereby DCC has had regard to all available flood information and the appropriate regeneration of the Urban Core. Appropriate restrictions and policies for development of these sites have been set out, and all other land use zonings are located in appropriate Flood Zones.

Flood Zone mapping for Bridgend is included in Appendix A (ref.: M02249-01_FL102-02).

5.6.4 Carndonagh

Carndonagh is located just upstream of two of the main river sources of Trawbreaga Bay, a tidal estuary at the north of Inishowen in Donegal. The Donagh and Glennagannon Rivers are the main sources of fluvial

flood risk to Carndonagh. Due to the distance upstream, the watercourses are not considered tidally influenced through Carndonagh. Historical reports coincide with the identified areas of flood risk.

Land use zonings for Proposed Variation No. 1 within Carndonagh have been reviewed and amended to locate proposed development within appropriate flood zones. The sequential approach has been followed throughout Carndonagh, entirely locating land use zonings within appropriate flood zones and restricting development accordingly. No Plan-Making JTs have therefore been required for the settlement area.

Flood Zone mapping for Carndonagh is included in Appendix A (ref.: M02249-01_FL101-02).

5.6.5 Donegal Town

Donegal Town is bounded to the west by Donegal Bay, with several coastal watercourse flowing south-west through the settlement. The River Eske is tidally influenced through the Town, as it outlets through the town bound to Donegal Bay from upstream Lough Eske. Historical reports coincide with the identified areas of flood risk.

Land use zonings for Proposed Variation No. 1 within Donegal Town have been reviewed and amended to locate proposed development within appropriate flood zones. Donegal CC have taken care to appropriately designate lands within the river corridors and floodplain as Open Space and Recreation, Local Environment 2 and Established Development 2 to appropriately restrict development. New Residential and Business enterprise land use zonings have been appropriately located in Flood Zone C.

Designations within the flood zones for the Urban Core, Masterplan, Opportunity Sites 4, 5, 7, and 11 zonings have been subject to Plan-Making JTs, whereby DCC has had regard to all available flood information and the appropriate regeneration of the Urban Core. The Masterplan Area and Opportunity Sites will be carefully planned to appropriately consolidate this area having regards to good planning and flood risk. Appropriate restrictions and policies for development of these sites have been set out, and all other land use zonings are located in appropriate Flood Zones.

Flood Zone mapping for Donegal Town is included in Appendix A (ref.: M02249-01_FL105-02).

5.6.6 Killybegs

Killybegs is characterised by its harbour, with minor coastal watercourses such as the Cunlin Lough Stream and the Drumbeagh River (CFRAM modelled) flowing through the town to the sea. Walls along Killybegs harbour are identified primarily to prevent wave-overtopping, and are not considered formal coastal flood defences. Historical reports coincide with the identified areas of flood risk, where it is noted a combination of heavy rain and high tides causes flooding annually, with the R263 road liable to flood and properties are affected.

Land use zonings for Proposed Variation No. 1 within Killybegs have been reviewed and have regard to the proposed flood zones and flood information maps. New Residential land use zonings have been appropriately located in Flood Zone C.

Designations within the flood zones for the Urban Core, Business Enterprise (2), Community Infrastructure, Port/ Harbour Related Activities, and Opportunity Sites 1, 2, 3, 4, 8 and 10 zonings have been subject to Plan-Making JTs, whereby DCC has had regard to all available flood information and the appropriate regeneration of the Urban Core. Several of these zonings reflect marginally effected lands within sites with existing long-standing uses, and reflects the ongoing occupation by existing businesses, within car park areas (appropriate within flood zone). The Port/Harbour Related zonings seek to prioritize the Killybegs Harbour as the driving force of the town and industry: the lands are envisaged for primarily development of docks, marinas and wharves; navigation facilities; ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. However, the zoning further reflects the potential for ancillary development to support the Port and Harbour, and therefore a JT has been prepared. Appropriate restrictions and policies for development of these sites have been set out, and all other land use zonings are located in appropriate Flood Zones.

Flood Zone mapping for Killybegs is included in Appendix A (ref.: M02249-01_FL104-02).

6 DEVELOPMENT MANAGEMENT

6.1 Overview

This SFRA has been prepared to support Proposed Variation (No. 1) to the County Donegal Development Plan 2024-2030, in accordance with the OPW Guidelines. It has considered flood risk information and data from a variety of sources and presented Stage 1 and Stage 2 flood risk assessments.

The SFRA has also set out requirements for all new development in the Settlement Areas during the 6-year period of the LAP. Development management of flood risk shall be in accordance with the OPW Guidelines, as well as policies in this document to take account of local factors. Further reference should be made to the Donegal County Development Plan 2024-2030, and the associated SFRA.

The overarching purpose of development management measures is to ensure that:

- Development will not be at unacceptable risk of flooding
- Development will not increase flood risk elsewhere

6.2 Stages of Flood Risk Assessment

The OPW Guidelines set out in detail the requirements for all scales and stages of FRA, and the subsequent requirements to be applied to proposed development in the settlements of Carndonagh, Bridgend, An Clochán Liath (Dungloe), Killybegs, Donegal Town and Ballyshannon is designed to be implemented alongside that of the OPW Guidelines and associated Technical Appendices.

The three stages of flood risk assessment are (as described in Section 3.9.1):

- Stage 1 Flood Risk Identification
- Stage 2 Initial Flood Risk Assessment
- Stage 3 Detailed Flood Risk Assessment

In order to ensure that flood risk is considered at an early stage to protect future development and increase flood resilience and sustainability, when assessing development proposals under the development management process, all development is subject to Stage 1 Flood Risk Identification / flood risk screening as a minimum to establish the need or otherwise for further flood risk assessment. Where a source and pathway for flood risk is identified then further assessment in the form of a Stage 2 FRA (or dependent on the nature of the flood source and pathway, Stage 3 FRA) will be required.

All development subject to a Stage 2 FRA (or greater) will be required to submit a Site-Specific Flood Risk Assessment (SSFRA) in support of any associated planning application(s). It is noted that Stage 1 FRAs may be undertaken without the need for a full SSFRA report.

All SSFRAs must demonstrate that a sequential approach was applied to site layout and design. The scale / stage of SSFRA will depend on the risks identified and the proposed land use as outlined in the following sections.

6.2.1 Flood Risk Assessment

FRAs aim to identify, quantify, and communicate to stakeholders and decision-makers the risk of flooding to land, property, and people. The purpose of an FRA is to provide sufficient information to determine whether applications for proposed development are appropriate. An FRA should therefore:

- Identify whether (and the degree to which) flood risk is an issue
- Identify Flood Zones
- Inform decisions in relation to development of site layouts
- Develop appropriate flood risk mitigation and management measures for proposed developments

Assessment of flood risk is therefore a fundamental component of proposing and planning development. FRAs are typically undertaken over a number of stages with the need for progression to a more detailed stage dependent on the outcomes of the former stage until the level of detail of the FRA is appropriate to

support the proposed development. The following sections summarise the requirements / content of each stage, as per the OPW Guidelines.

6.2.1.1 Stage 1 FRA

A Stage 1 FRA is to identify whether there may be any flooding or surface water management issues related to a proposed development that may warrant further investigation. Identification is the process for deciding whether a proposed development requires a Stage 2 / Stage 3 FRA report and is essentially a desk-based screening exercise based on existing information.

To establish whether a flood risk source affects a site (now or in the future), the site location should be screened against number a range of data sources including, but not limited to:

- SFRA flood maps[10] including Climate Change flood maps
- OPW flood maps (floodinfo.ie)
- OPW benefitting land / arterial drainage maps (floodinfo.ie)
- OPW 'Past Flood Events' (floodinfo.ie)
- Flood data obtained from stakeholders (OPW, GSI, Local Authority, landowner etc.)
- Proximity (on plan and elevation) to unmodelled watercourses for which no flood data exists.

All sites must consider the impact of flooding from sources as well as rivers including surface water flood risk. It is an objective of the SFRA that all sites implement surface water drainage (SuDS) measures to manage effects from drainage to flood risk elsewhere.

A Stage 1 FRA will conclude either:

- No potential source of flood risk or surface water management issue has been identified.
- If the site is affected by or proximal to a source of flooding, then a Stage 2 / Stage 3 FRA is required to further assess an identified source of potential flood risk.

A Stage 1 FRA does not necessarily require specialist skills. There may not be a requirement for submission of a SSFRA where the outcomes can be conveyed in another manner (e.g. inclusion on planning drawings).

6.2.1.2 Stage 2 FRA

A Stage 2 FRA is to confirm sources of flooding that may affect a proposed development site, to appraise the adequacy of existing information and to determine what surveys and modelling approach is appropriate for the spatial resolution required / complexity of the flood risk issues.

Appraisal and assessment of flood risk shall be proportionate to the scale and nature of the development proposed, the risk to the development and effect elsewhere, and the complexity of the flood source or pathway.

It is the responsibility of the developer / applicant to seek out an appropriately qualified flood risk professional / hydrologist to undertake such an assessment.

The extent of the risk of flooding should be assessed which may involve preparing indicative flood zone maps. Where existing river models exist, these should be used broadly to assess the extent of the risk of flooding and potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures.

A Stage 2 FRA must be sufficiently detailed to allow the determination of the flood risk to proposed development. The initial assessment may determine that sufficient quantitative information is already available, appropriate to the scale and nature of the development proposed, for the necessary decision to be made. If not, then the onus is on the applicant to produce new flood data (by flood modelling) and the Flood Risk Assessment should progress to Stage 3.

A Stage 2 FRA will generally fully incorporate the findings and outcomes of the Stage 1 FRA and expand on the assessment to include the following:

[10] Note that flood data shown on SFRA mapping may be superseded or updated within the lifetime of the Plan

- An examination of all sources of flooding that may affect a site
- An appraisal of the availability and adequacy of existing information
- Produce flood zone map where not available
- Determine what technical studies are appropriate
- Describe what residual risks will be assessed
- Potential impact of development on flooding elsewhere
- Scope of possible mitigation measures and what compensation works may be required and what land may be needed
- Set out requirements for subsequent stages of FRA

There are two possible outcomes of a Stage 2 FRA:

- Potential sources of flood risk or surface water management issues identified in a Stage 1 FRA have been shown to not pose a risk of flooding to the proposed development.
- Stage 3 FRA is required to further assess an identified flood risk (typically requiring hydraulic modelling).

A Stage 2 SSFRA to support a planning application should take the form of a comprehensive FRA report and be submitted to the Local Authority.

6.2.1.3 Stage 3 FRA

A Stage 3 FRA is to assess flood risk issues in sufficient detail and to provide a quantitative appraisal of potential flood risk to a proposed or existing development, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures. As per the OPW Guidelines, this will typically involve use of an existing or construction of a hydraulic model across a wide enough area to appreciate the catchment wide impacts and hydrological processes involved.

Where Stage 1 / Stage 2 FRAs indicate that a proposed development is at risk of flooding, a detailed Stage 3 FRA, incorporating findings and outcomes from previous Stages, must be carried out.

Assessment of flood risk and any subsequent mitigation measures principally relies on estimation of flow, level and the performance of the development at an appropriate degree of accuracy that will deliver 'fit-for-purpose' information for decision-making. It is also important that an assessment of flood risk should consider both the actual and the residual risks:

- Actual flood risk is the risk posed to an area, whether it is behind defences or undefended, at the time of the study. This should be expressed in terms of the probability of flooding occurring, taking into account the limiting factors, both natural and manmade, preventing water from reaching the development.
- Residual risks are the risks remaining after all risk avoidance, substitution and mitigation measures have been taken. Examples of residual risks include the failure of flood management measures, blockages and a flood event that exceeds the flood design standard.

Recommended content for a Stage 3 FRA, in addition to that included in Stage 1 and Stage 2 analysis, includes but it is not limited to:

- Initial assessment / Stage 2 summary
- Hydrological calculations
- Hydraulic model assessment / summary
- Assessment of climate change and culvert blockage
- Proposed mitigation measures; freeboard; evaluation of the effect of development on flood risk elsewhere; requirements for Flood Compensatory Storage (FCS) as per Section 6.5.5 etc.

Supporting information; drawings, maps, calculations etc.

6.2.2 Site Specific Flood Risk Assessment Report

The outcomes of a Stage 2 or Stage 3 flood risk assessment should be reported in an appropriate site-specific flood risk assessment (SSFRA) report.

SSFRAs should be carried out in accordance with the OPW Guidelines and requirements established by this SFRA and should present in sufficient detail:

- The potential flood risk to a proposed development based on the Source-Pathway-Receptor model.
- An assessment of existing flood risk in terms of the likelihood of flooding and resultant consequences.
- An assessment of the potential, post-development risks having regard to the design of mitigation and compensation measures.
- Any additional risk of flooding to the proposed development due to climate change and culvert blockage.
- Any proposed mitigation measures including setting of FFLs and FGLs.
- Details of the surface water / SuDS drainage proposals.

Further details relating to the content of all Stages of FRA can be found in the OPW Guidelines and associated Technical Appendices.

6.3 Flood Zoning

Flood Zoning for development management shall apply as outlined in Section 3.6 of this report. Flood Zones established by this SFRA, and any new assessments of Flood Zones established by site-specific assessments are to be generated with the inclusion of the High-End Future Scenario climate change factor, in accordance with the Donegal County Development Plan 2024-2030. The presence of flood protection structures should be ignored as areas protected by flood defences still carry a residual risk from overtopping or breach of defences.

Flood Zones represent flood extents for the existing, undefended present-day scenario. Once Flood Zones have been established, proposed development layouts should be prepared in line with the requirements of the OPW Guidelines, as outlined in the following sections. Flood Zones are established based on suitable available information or site-specific hydraulic modelling where identified as necessary by a Stage 2 FRA.

Hydraulic modelling should be proportionate and fit for purpose and shall be undertaken by an appropriately qualified competent and experienced professional. Where a model is intended to challenge or better define SFRA flood zone mapping then any new modelling must be of an equivalent or better standard.

Flood Zones determined on mapping with this SFRA are not exhaustive and 'new' Flood Zones may be developed by SSFRAs and / or new flood risk datasets produced and published during the lifetime of the Plan.

6.4 The Sequential Approach and Justification Test

6.4.1 Sequential Approach

In the preparation of proposed layouts, prior to any planning application, the Sequential Approach outlined in Section 3.10.1 should be followed to ensure that flood risk to development is minimised and greatest protection from flooding is given to higher vulnerability developments.

The sequential approach aims to:

- Avoid flood risk where possible, substitute less vulnerable uses where avoidance is not possible, and mitigate and manage the risk where avoidance and substitution are not possible.
- Apply the Justification Test for development in flood risk areas.

The receptor vulnerability (see Table 3.3) will apply in determining the suitability of any proposed development. Siting of development in an inappropriate Flood Zone, as shown in Table 6.1, will require the application of a Development Management Justification Test (refer to Table 6.2).

Residual risks that have the potential to increase flood extents and levels higher than Flood Zones, such as climate change (see Section 6.5.1) and culvert blockage (see Section 6.5.2) must be considered and presented as part of any SSFRA.

Table 6.1: Vulnerability and Flood Zone Matrix for Justification Test

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

6.4.2 Development Management Justification Test

Where development is proposed in an 'inappropriate' Flood Zone, a Justification Test must be applied and submitted alongside a Stage 3 SSFRA. The criteria of a development management Justification Test that must be satisfied are set out in Table 6.2, as per the OPW Guidelines.

Where the primary mitigation for a site in Flood Zone A or Flood Zone B is a flood defence that protects the area from being located in functional floodplain, the Justification Test and SSFRA should contain information relating to the standard of protection, nature, and maintenance / monitoring arrangements of the defence.

Table 6.2: Development Management Justification Test

No.	Criteria
1	The subject lands have been zoned or otherwise designated for the particular use or form of development in the Donegal County Development Plan 2024-2030, which has been adopted or varied taking account of the OPW Guidelines.
2	The proposal has been subject to an appropriate flood risk assessment that demonstrates: • The development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk. • The development proposal includes measures to minimise flood risk to people, property, the economy, and the environment as far as reasonably possible. • The development proposed includes measures to ensure that residual risks to the area and/or development can be managed to an acceptable level as regards the adequacy of existing flood protection measures or the design, implementation and funding of any future flood risk management measures and provisions for emergency services access. • The development proposed addresses the above in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes.

The acceptability or otherwise of levels of residual risk should be made with consideration of the type and foreseen use of the development and the local development context.

Applications for minor development, such as small extensions to houses, and most changes of use of existing buildings and or extensions and additions to existing commercial and industrial enterprises, are unlikely to raise significant flooding issues, unless they obstruct important flow paths, introduce a significant additional number of people into flood risk areas or entail the storage of hazardous substances. Since such applications concern existing buildings, the sequential approach cannot be used to locate them in lower-risk areas and the Justification Test will not apply. However, a commensurate assessment of the risks of flooding should accompany such applications to demonstrate that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities. These proposals should follow best practice in the management of health and safety for users and residents of the proposal.

6.5 Flood Risk Mitigation

The primary objective of the OPW Guidelines and Development Management requirements outlined in this SFRA is to ensure development is resilient relative to the design flood event; 1% AEP for less vulnerable development and 0.1% AEP for highly vulnerable development.

In addition, there are further flood events and residual risk that must be considered as outlined on the following sections.

6.5.1 Climate Change

Climate change is an important theme in the Donegal County Development Plan 2024-2030. Donegal CC have adopted a conservative and proactive approach to climate change adaptation, by adopting the High-End Future climate change scenario in the delineation of flood zones. Donegal CC has taken the stance that as there is an increasing likelihood that Irelands climate will be similar to that depicted in the High-End Future climate change scenario by the year 2100, it is prudent to consider the HEFS parameters when planning for vulnerable infrastructure and developments.

Table 6.3: OPW Climate Change Allowances

Parameter	Mid-Range Future Scenario (MRFS)	High End Future Scenario (HEFS)
Mean Sea Level Rise	+500mm	+1000mm
Peak River Flood Flows	+ 20%	+ 30%
Extreme Rainfall Depths	+ 20%	+ 30%

6.5.2 Culvert Blockage

Residual risk associated with the blockage of any watercourse crossing (i.e., culvert, bridge, etc.) that has the potential to increase flooding at the proposed development site should be assessed as part of a Stage 3 SSFRA.

At a minimum, a 50% blockage scenario should be considered. Where there is an established history of blockage or site conditions suggest a greater blockage is likely, then greater %-blockage should be assessed.

Where multiple watercourse crossings have the potential to increase flooding at the proposed development site, a joint probability analysis of simultaneous cumulative blockages should be assessed.

While flood extents predicted for a blockage scenario do not influence flood zoning, this residual risk to the proposed development should be assessed, and adequate mitigation and management measures should be proposed to manage flood risk to the proposed development.

A site-specific hydraulic model is likely to be required to facilitate assessment of the impact of watercourse crossing blockage.

6.5.3 Design Levels and Freeboard

A key mechanism for providing flood protection and resilience is the setting of Finished Floor Levels (FFLs), Finished Ground Levels (FGLs), or flood defence levels with appropriate freeboard above the relevant design flood levels. Minimum freeboard requirements for fluvial and coastal flooding are set out in Table 6.4.

Freeboard is a safety margin to account for uncertainties in water-level prediction and / or structural performance. It is the difference between the FFL / FGL or flood defence and the adjacent design flood level. Freeboard is designed to account for uncertainty in hydrological predictions, wave action, modelling accuracy, topographical accuracy and the quality of digital elevation models.

Due to the varying sensitivity of development, freeboard is to be applied based on the classification of receptor vulnerability. Where minimum freeboard requirements cannot be met, a lesser standard of protection must be justified within a SSFRA. If achieving freeboard requires raising of ground levels within a floodplain, then the requirement for Floodplain Compensatory Storage as outlined in Section 6.5.5 must be considered.

In addition to the requirements outlined below, including in areas not predicted to be at risk of flooding, then the siting of building floor levels should seek to ensure resilience to surface water flooding or drainage system failure.

In some instances, such as minor development / infill in existing developed / zoned areas or for sites benefitting from flood defences, freeboard requirements can potentially be relaxed if justified as part of a SSFRA and adequate mitigation (including emergency planning) is included in overall site design. Consultation with the Local Authority prior to submission of a planning application in relation to reduction in min. freeboard requirements is recommended.

Table 6.4: Minimum Design Level Requirements for Fluvial / Coastal Flooding

Receptor Vulnerability	Minimum Design Level Requirements
Highly Vulnerable	0.1% AEP (HEFS / Flood Zone B) flood level + **300mm** freeboard
Less Vulnerable	1% AEP (HEFS / Flood Zone A) flood level + **300mm** freeboard
Water Compatible	No minimum design level requirement

6.5.4 Access and Egress

In accordance with the OPW Guidelines, access to and egress from any development should be within Flood Zone C (i.e., outside the 0.1% AEP fluvial floodplain). Where this is not achievable due to on-site or off-site flood risk, a Flood Management Plan for the development will be required. The contents of the Flood Management Plan should be confirmed within a SSFRA.

SSFRAs should outline the emergency procedures that will be applied in the event of a flood. Evacuation routes should be identified but if this is not possible then containment may be considered if is considered safe and practical to do so. If either safe evacuation or containment is not possible, then the development proposal may be refused.

6.5.5 Flood Compensatory Storage / Floodplain Re-Profiling

The likely impact of any displaced flood water on lands elsewhere caused by alterations to ground levels, reducing floodplain attenuation, impeding flood flow routes, or raising flood embankments requires Flood Compensatory Storage (FCS) works to be undertaken. However, it is generally accepted that land raising in direct coastal floodplains (i.e. excluding tidally influenced watercourses and estuaries) has negligible effect on flooding elsewhere and as such those proposals will not require FCS.

FCS strategies are divided into direct and indirect. These terms come from UK Construction Industry Research and Information Association (CIRIA) report C624 “Development and flood risk – guidance for the construction industry (2004)”.

- Direct or ‘level for level’ methods, as they are also known, re-grade land and provide a direct replacement for the lost storage volume.
- Indirect methods rely on water entering a defined storage area which then releases it at a slower rate, similar to a surface water attenuation scheme.

The OPW Guidelines state that level for level FCS should apply to any loss in the 1% AEP / Flood Zone A functional floodplain volume. The approach to level for level FCS is summarised as follows:

- A volume of floodplain equal to that lost to the proposed development should be created.
- The equal volume should apply at all levels between the lowest point on the site and the design flood level. Normally this is calculated by comparing volumes taken by the development and the volume offered by the compensatory storage for a number of horizontal slices through the range defined above.
- The thickness of a slice should be typically 0.1m. In the case of large flat sites or very steep sites this may be varied to 0.2m or even 0.05m in order to have about 10 slices to compare.
- Level for level FCS storage should be provided equal to or exceeding that lost as a result of development for each of these slices.

Consultation prior to submitting a planning application is required with the Local Authority on a site-specific basis for proposed developments that proposed to change ground levels / cause land raising in Flood Zone B. FCS / floodplain re-profiling for the 0.1% AEP / Flood Zone B flood event may be required. While less vulnerable development is 'appropriate' within Flood Zone B, FCS may be required to ensure no increase in flood risk elsewhere up to the 0.1% AEP flood. FCS for the 0.1% AEP flood event is to be provided on a level-for-level basis as much as possible but can be undertaken on a 'volumetric' approach if necessary. The approach to volumetric FCS is summarised as follows:

- A volume of floodplain equal to that lost to the proposed development should be created.
- The equal volume should apply between the lowest point on the site and the design flood level, calculated at a number of horizontal slices as far as possible.
- Volumetric FCS storage should be provided equal to or exceeding the total lost as a result of development.
- Provided FCS volume should not be provided at a lower level than existing lowest ground level in an area that will not naturally drain into the watercourse as floodwater subsides.

It is noted that a site-specific hydraulic model is likely to be required to facilitate assessment of the impact of FCS at the site and surrounding areas.

In addition to the requirements listed above, when completing a site-based FRA as part of meeting the requirements of the Justification Test, an assessment will be required of on- and off-site opportunities for reducing flood risk overall (e.g. flood storage). This will include an appraisal of wider flood risk management measures to which the development can contribute.

6.6 Drainage and Surface Water Management

All development proposals shall carry out a surface water and drainage assessment and shall be compliant with the following to ensure that drainage from the site is managed sustainably:

- Department of Housing, Local Government and Heritage (DHLGH) Rainwater Management Plans – Guidance for Local Authorities (2024)
- DHLGH Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (2022)
- CIRIA SuDS Manual C753 (2015)
- Greater Dublin Regional Code of Practice for Drainage Works (2012)
- Greater Dublin Strategic Drainage Study (GDSDS) (2005)
- Donegal County Development Plan 2024-2030 Strategic Flood Risk Assessment (See Section 7: Stormwater Management Strategy and SuDS Retrofit)

It is noted that updates to the above documents and / or new published documents during the lifetime of the SFRA are to be implemented as part of Development Management where appropriate.

The following sections outline SuDS principles that are to be followed as part of any future development within the Plan Areas. Regional SuDS (i.e. catchment-wide rather than site-specific) could be considered through a Rainwater Management Plan for the settlement in line with the DHLGH guidance listed above which requires settlements / urban areas to undertake RMPs within a specified timeline.

6.6.1 Drainage Hierarchy

The way runoff is dealt with within the Plan Areas should adhere to the following drainage hierarchy (in order of decreasing preference):

- Reuse – Where opportunities arise for rainfall harvesting within proposed development plans, these should be maximised.
- Infiltration – Infiltration could be utilised subject to outcome of site investigation.
- Watercourse – Discharge should be controlled and 'clean' prior to entering natural waterbody.
- Surface Water Sewer – Controlled discharge should not increase flood risk downstream within the sewer network.
- Combined Sewer – Last resort, should not increase the risk of CSO spill.

In line with the discharge hierarchy, where the outcome of a site investigation indicates sufficient permeability, the preferred discharge route from any site will be via infiltration of runoff into the ground (where reuse options have been exhausted).

6.6.2 Water Quantity

Sufficient attenuation is to be provided to ensure no unpredictable flooding occurs within any site, future development is protected and does not increase flood risk elsewhere. Flows are to initially be temporarily stored at points of collection (i.e., source controls) along the conveyance route and at the points of proposed storage.

Where infiltration is deemed suitable through site investigation, sufficient storage will be provided to accommodate up to the 1% AEP rainfall runoff with allowance for climate change. Where infiltration is not feasible, surface water attenuation of the 1% AEP rainfall runoff with allowance for climate change should be provided with flows controlled to greenfield runoff rate.

The future impacts of climate change on rainfall should be accounted for in the design of a drainage scheme. Requirements for climate change allowances are set out in the OPW's 'Climate Change Sectoral Adaptation Plan' published in 2019, which recommends a 20% uplift in extreme rainfall depths for the Mid-Range Future Scenario (MRFS) and a 30% uplift for the High-End Future Scenario (HEFS).

In designing for blockage and exceedance, design levels and landscaping should be designed to route exceedance flows away from buildings. Overland flow routes should be managed in a safe manner using the drainage systems, roads, and public spaces to convey and control floodwater during extreme events. Exceedance outflows from any site will be designed to mimic the existing flow patterns and ensure that there is no increased risk to any other areas.

6.6.3 Water Quality

Design of individual SuDS components for water quality treatment should comply with the criteria set out in the CIRIA SuDS Manual (refer to the relevant chapter for each SuDS component).

Where site investigation / infiltration testing indicate that existing ground conditions have sufficient capacity for infiltration, groundwater risk screening (as set out in Chapter 26, Tables 26.5 and 26.6 of the CIRIA SuDS Manual) should be undertaken to demonstrate manageable risk.

If infiltration is deemed suitable or if attenuation is proposed with a positive discharge point from the proposed development site, the 'simple index approach' is to be used to validate design for water quality treatment (as set out in Section 26.7 of the CIRIA SuDS Manual). Application of treatment indices applied in the simple index approach will depend on whether the proposed system is attenuation or infiltration (refer to Sections 26.3 and 26.4 of the CIRIA SuDS Manual, respectively).

Sufficient treatment is to be provided prior to flows being attenuated in any SuDS areas being promoted for amenity / biodiversity function.

6.6.4 Amenity

Amenity focuses on the usefulness and aesthetic elements of SuDS design associated with features 'at or near the surface' and considers both multi-functionality and visual quality.

The following are highlighted for consideration as part of the development of the SuDS design:

- SuDS should be 'legible' (i.e., understandable in terms of their operation to people using the area and to maintenance personnel).
- The visual character of the SuDS component will enhance the development.
- Spaces and connecting routes are multi-functional and can be used when not providing a SuDS function for surface water management.
- The design shall ensure the proposed development is generally accessible and 'safe by design'.
- Consideration should be given to information boarding to inform RMP Area users of the benefits of the SuDS scheme and also give guidance to the potential of temporary or permanent presence of surface water storage.

6.6.5 Biodiversity

Biodiversity must be considered in the design at both a catchment and site scale to create sympathetic blue-green infrastructure and at local scale to provide habitat and connectivity linkages within and around the RMP Area.

The following are highlighted for consideration as part of the development of the SuDS design:

- Ensure water quality within the water environment by following the steps of the simple index approach (as set out in Chapter 26, Box 26.2 of the CIRIA SuDS Manual).
- Demonstrate ecological design and the creation of habitats within the SuDS corridor.
- Keep water at or near the surface as it flows through the SuDS management train towards to wider landscape to ensure habitat connectivity.
- Confirm management practices to enhance habitat development during maintenance.

7 SUMMARY

7.1 Overview

In achieving the objectives of the OPW Guidelines, Donegal CC must:

- Adopt a sequential approach to flood risk management, which aims to (1) avoid flood risk where possible, (2) substitute less vulnerable uses where avoidance is not possible, and (3) mitigate and manage the risk where avoidance and substitution are not possible.
- Apply the Justification Test for development in flood risk areas.

A precautionary approach should also be applied to flood risk management to reflect uncertainties in available flood data, risk assessment techniques, climate change projections, and performance of existing flood defences.

7.2 Conclusion

This SFRA report has been prepared in accordance with the OPW Guidelines and DHLGH Circular PL2/2014, and provides an assessment of all sources of flood risk within the Plan Areas to assist Donegal CC in making informed strategic land-use decisions. The collation and presentation of flood risk information will support Donegal CC to apply the requirements of the OPW Guidelines including the Sequential Approach and Justification Test. The SFRA also outlines the requirements of site-specific FRAs through development management.

As part of this assessment, a Stage 1 Flood Risk Identification reviewed available flood risk information and identified any flooding or surface water management issues in the Plan Areas that warrant further investigation. Following the guidance set out in the OPW Guidelines, both primary and secondary sources of flood risk information have been used to inform this SFRA. Subsequently, a Stage 2 SFRA Initial Flood Risk Assessment was undertaken to confirm the sources of flooding that may affect lands within the Plan Areas, appraise the proposed land zonings relative to the flood data / Flood Zone Maps, provide clarification on the requirement for a site-specific FRA and Justification Test, based on the proposed use and associated vulnerability of a land zoning.

Therefore, the Proposed Variation is considered to have been adequately prepared in accordance with the approach set out in the Flood Risk Management Guidelines.

7.3 SFRA Review and Monitoring

It is recommended that the SFRA be reviewed and updated alongside any future changes to current County Development Plan as well as part of subsequent County Development Plans. Additionally, outputs from future studies and datasets may trigger a review and update of the SFRA during the lifetime of the Plan.

Proposed developments should take account of the most up to date OPW guidance on flood risk management and climate change as part of site-specific Flood Risk Assessments.

Appendix A

Flood Zone Maps

646000

648000

946000

944000

N

R238

R244

R240

Station Road

Convent Road

Carndonagh

0 0.25 0.5 km

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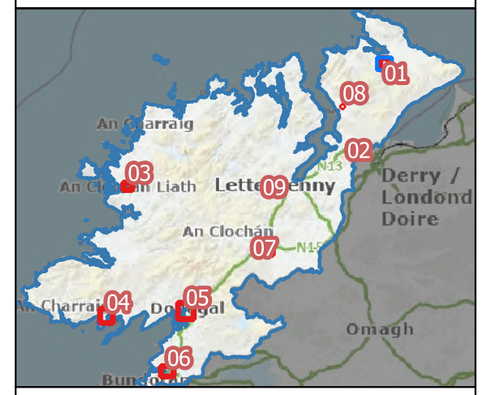
MAP SERIES	01 OF 09

KEY PLAN



LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudnary
- Watercourses
- Flood Zone A
- Flood Zone B

REV:	NOTE:	DATE:
02	FOR INFORMATION	18/09/2025

Comhairle Contae Dhún na nGall
Donegal County Council

McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

MAP:	FLOOD ZONES	
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640000

922000

922000

N

Bridge End

640000

0 0.25 0.5 km

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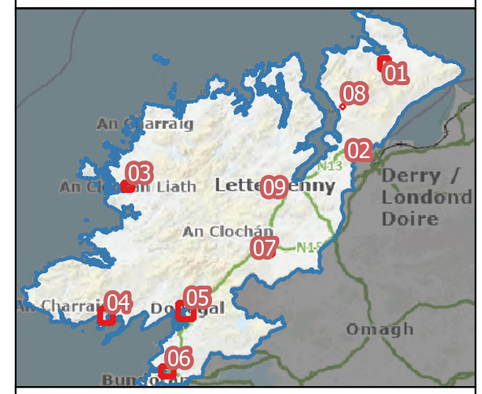

LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudnary
- Watercourses
- Flood Zone A
- Flood Zone B

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Donegal County Council

McCloy Consulting

Unit 12, The Beat Centre,
Stephenstown Industrial Estate,
Balbriggan, Co. Dublin

T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

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576000

578000

912000

N

Dunglow Lough

Dunglow

0 0.25 0.5 km

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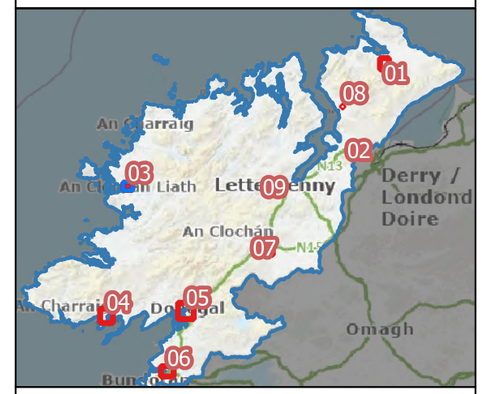

LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudnary
- Watercourses
- Flood Zone A
- Flood Zone B

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Donegal County Council

McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

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570000

572000

878000

876000

N

R263

Main Street

Shore Road

Killybegs

Fintragh Road

0 0.25 0.5 km

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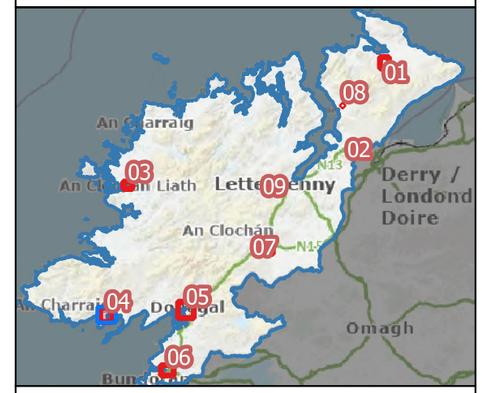

LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudnary
- Watercourses
- Flood Zone A
- Flood Zone B

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Donegal County Council

McCloy Consulting

Unit 12, The Beat Centre,
Stephenstown Industrial Estate,
Balbriggan, Co. Dublin

T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

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590000
592000
594000
880000
878000
876000
N
N56
N15
R267
Donegal
Ballybofey Road
The Glebe
0 0.25 0.5 km

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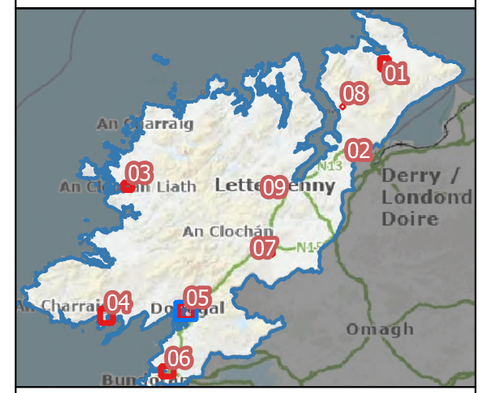

LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudnary
- Watercourses
- Flood Zone A
- Flood Zone B

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McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

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588000
862000
860000
N
R231
N15
Slate Row
R267
Bachelors Walk
Main Street
Ballyshannon
Assaroe Road
Allingham Road R936
N3
West Port
Assaroe Lake
0
0.25
0.5 km

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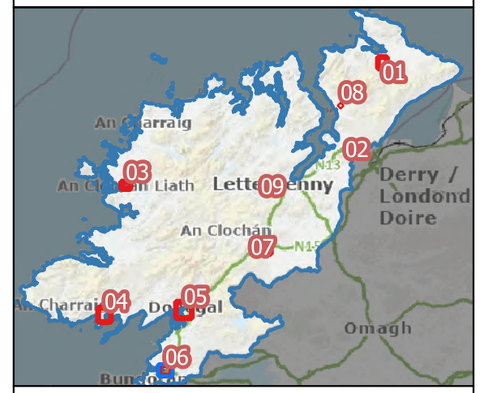

LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudnary
- Watercourses
- Flood Zone A
- Flood Zone B

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McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
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612000 614000 616000

896000

894000

N

Stranorlar

Ballybofey

N13 N15 R252 Glenfin Street

0 0.25 0.5 km

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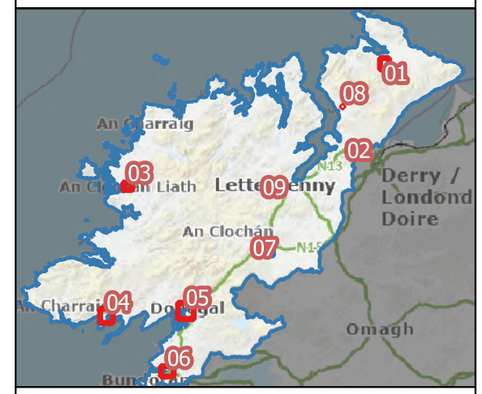

LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudnary
- Watercourses
- Flood Zone A
- Flood Zone B

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McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
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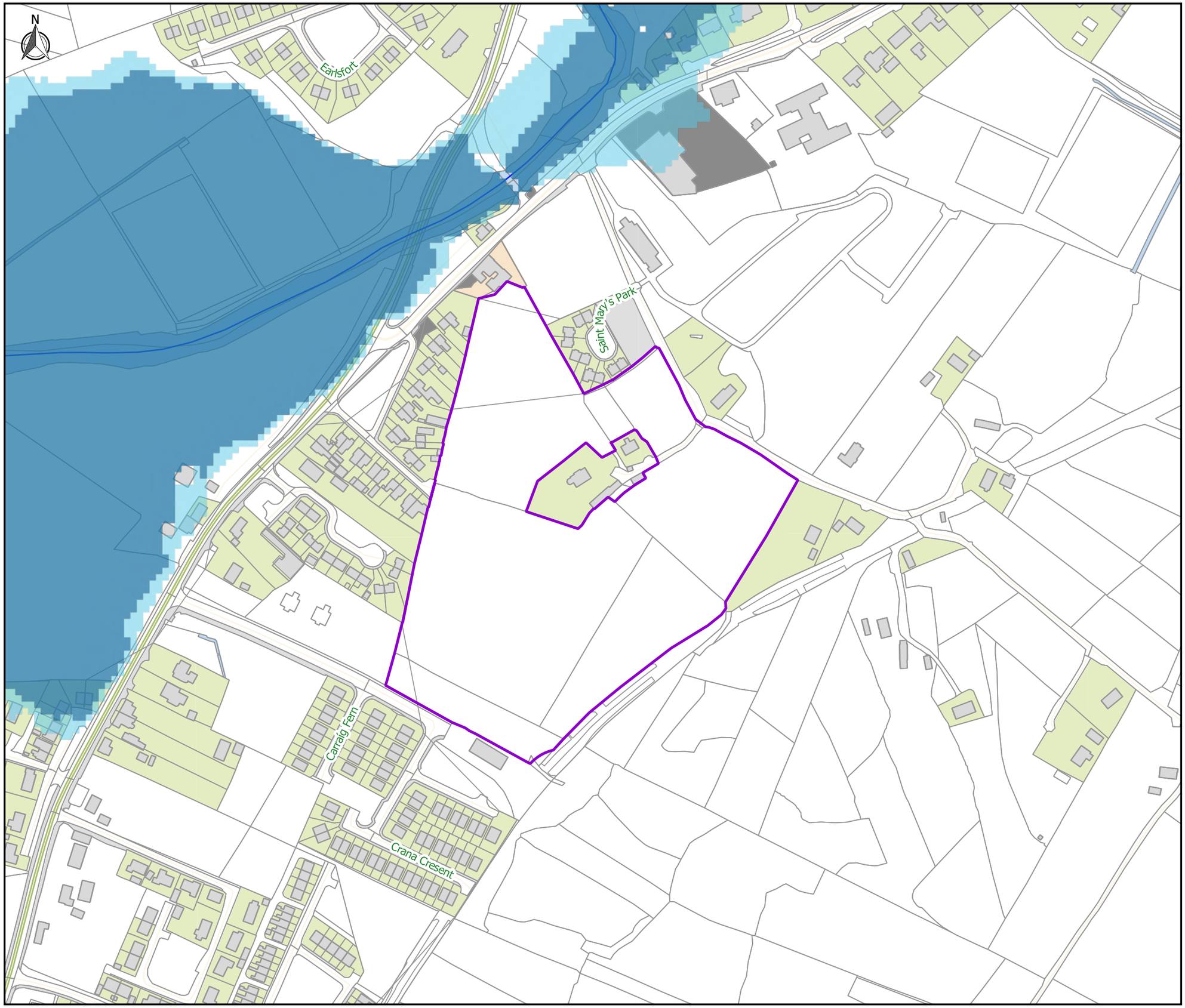

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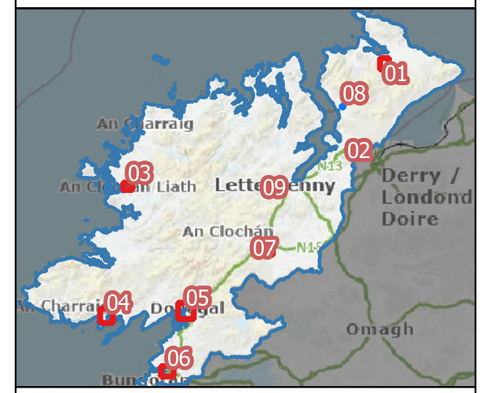

LEGEND

- Donegal County Administrative Boundary
- Amendments
- Watercourses
- Flood Zone A
- Flood Zone B

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McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
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616000
618000
914000
912000
910000
N
Letterkenny
N56
R245
R229
R940
R250
N13
0
0.25
0.5 km

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MAP SERIES	09 OF 09

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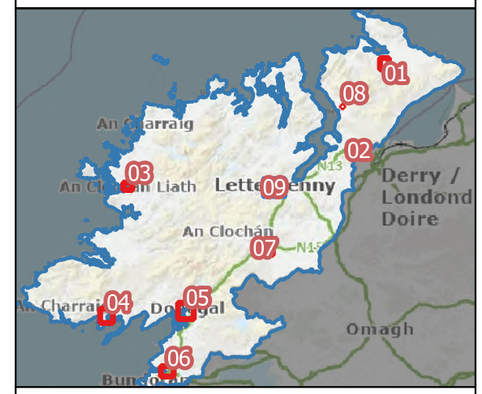

LEGEND

- Donegal County Administrative Boundary
- Amendments
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- Flood Zone A
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Donegal County Council

McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

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Appendix B

Donegal County Council Justification Tests

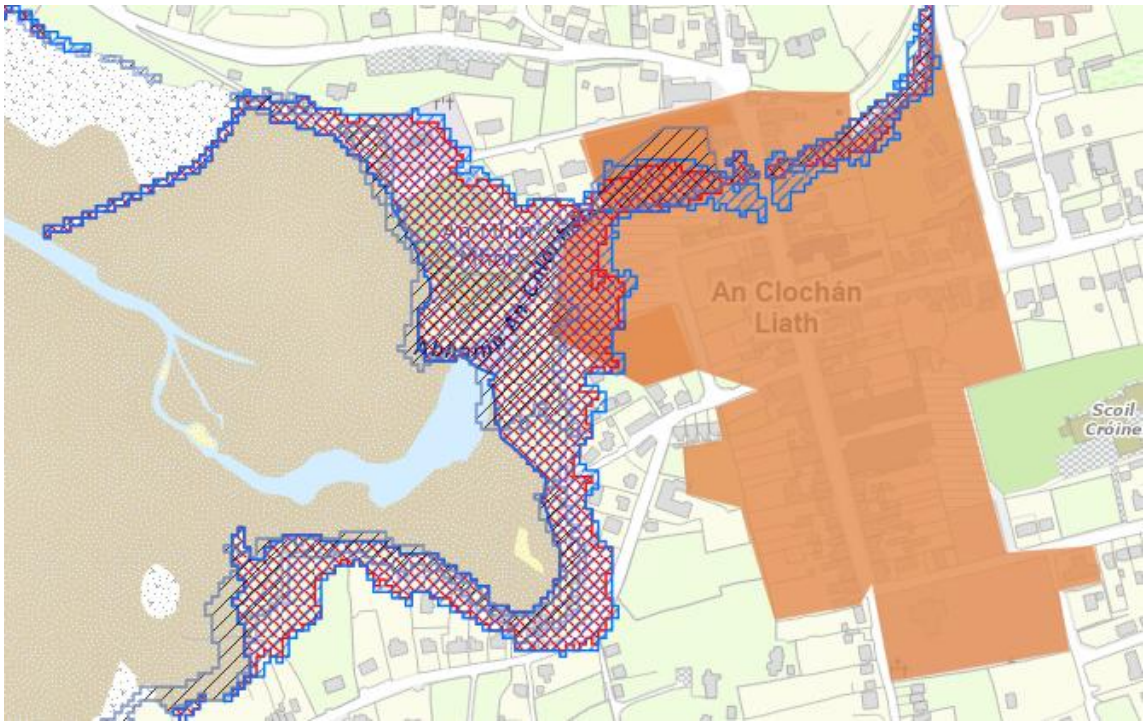
Appendix B.1

Donegal County Council Justification Tests

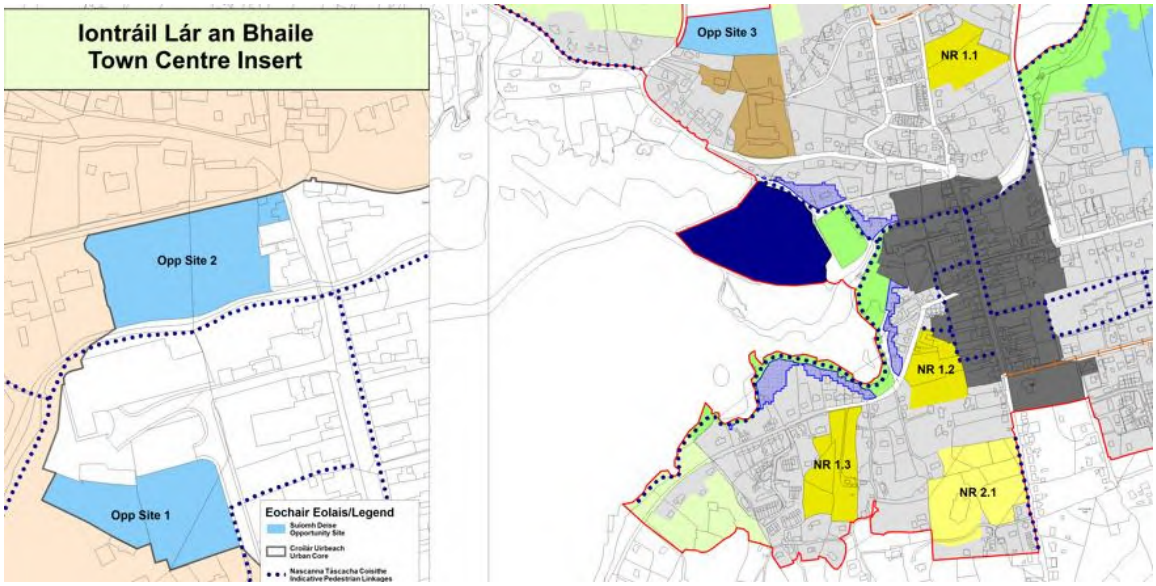
An Clochán Liath (Dungloe)

Justification Test for Development within the Urban Core/Town Centre Zoning (including Opportunity Sites 1&2) in An Clochán Liath located within Flood Risk Areas.

It is proposed that areas peripheral to Abhann An Clochán Leith that are extrapolated as being within Flood Zones A & B in the High End Future Scenario Indicative Flood Plain Maps be included as part of the urban core/town centre designation for An Clochán Liath. The justification test carried out for this aspect of the proposed urban core designation is detailed hereunder.



Excerpt from High End Future Scenarios Flood Maps showing that lands zoned as "Urban Core" are within Flood Zones A & B



Excerpt of Map 21.1 showing proposed "Urban Core" designation (in dark grey) within An Clochán Liath and Opp Site 1&2 within said designation (on the Town Centre Insert)

1. **The urban settlement is targeted for growth under the County Donegal Development Plan 2024-20230.**

   The town of An Clochán Liath is identified as a County Growth Driver and a Gaeltacht Service Town within the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to its location in the west of the County, its connectivity to Glenties and Letterkenny, and its large rural hinterland. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. The Development Plan's Core Strategy identifies a housing target of 151 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   The subject lands at risk from flooding are an integral part the historic town centre of An Clochán Liath and include historic areas around Main Street. An Clochán Liath Town Centre has suffered from a degree of vacancy and dereliction. Accordingly, the facilitation of commercial development at this location in An Clochán Liath Town Centre is required to regenerate and revitalise the town centre including providing town centre living, retail and service opportunities at a sustainable location which fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.

   ii) **Comprises significant previously developed and/or under-utilised lands:**
   The subject lands comprise part of the historic town centre of An Clochán Liath including existing residential and commercial buildings along Main Street, and its associated back lands.

   iii) **Is within or adjoining the core of an established or designated urban settlement:**
   The subject lands are located within the historic core of An Clochán Liath Town Centre.

   iv) **Will be essential in achieving compact and sustainable urban growth:**
   The subject lands are located within existing built-up footprint of An Clochán Liath Town Centre, consist predominately of existing residential and commercial buildings and associated backlands and are otherwise within easy walking distances of local schools and retail services. Accordingly, the facilitation of additional development at this location is essential to achieving and maintaining compact and sustainable urban growth.

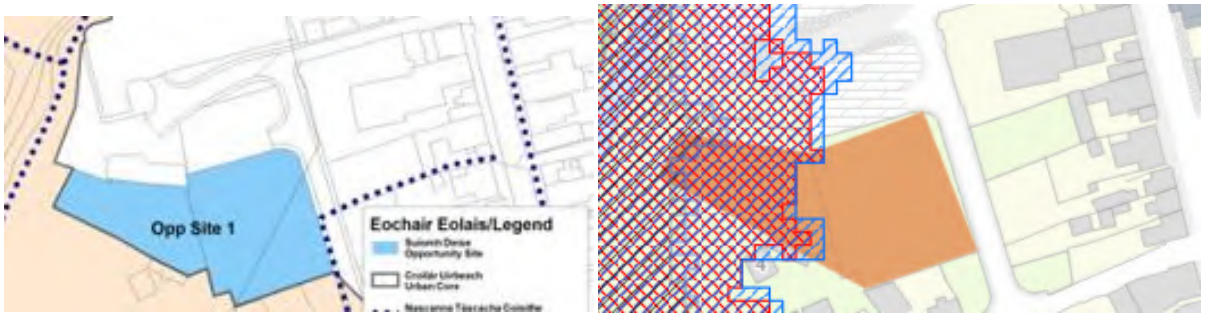
   v) **There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement:**
   The subject lands comprise of an existing developed area within the historic town Centre of An Clochán Liath. Accordingly, it is considered that Section 4.27a of the Flood

Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "highly vulnerable" or "less vulnerable" development can be permitted at these locations the proposal shall need to be subjected to a site-specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
   • FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
   • FRAs should consider the hydromorphological impacts on riparian corridors.
   • FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
   • Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

   Test Result
   It is considered that the "Urban Core" designation passes the justification test.

Justification Test for Opportunity Site 1



Part of Opportunity Site 1 is prone to inundation by Flood Zone A and Flood Zone B in the High End Future Scenario indicative flood mapping.

Policy ACL-OPP-P-1 of Proposed Variation No.1 to the County Donegal Development Plan 2024-2030 is as follows:

It is a policy of the Council to) "Consider proposals for commercial, tourism, community, civic or amenity uses on **Opportunity Site 1**. Proposals shall be sympathetic to the shorefront setting. Any structures proposed shall be located towards the eastern portion of the Opportunity Site area. Only "less vulnerable" development and/or "water compatible" development (as both defined in "The Planning System and Flood Risk Assessment Guidelines for Planning Authorities" (2009) and Circular PL02/2014 (August 2014)) will be considered where Flood Zone A or Flood Zone B intersects with the western portion of this Opportunity Site designation. Proposals for residential development on this site shall not be favourably considered."

As this policy provides for, *inter alia,* "less vulnerable" development (as defined in "The Planning System and Flood Risk Assessment Guidelines for Planning Authorities" (2009) and Circular PL02/2014 (August 2014)) within Flood Plain A it is necessary to carry out a justification test for the designation.

1. **The urban settlement is targeted for growth under the County Donegal Development Plan 2024-20230.**

   The town of An Clochán Liath is identified as a County Growth Driver and a Gaeltacht Service Town within the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to its location in the west of the County, its connectivity to Glenties and Letterkenny, and its large rural hinterland. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. The Development Plan's Core Strategy identifies a housing target of 151 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:

The subject lands at risk from flooding are an integral part the historic town centre of An Clochán Liath and lie at the Waterfront Area yet in close proximity to Main Street and the Town Centre. An Clochán Liath Town Centre has suffered from a degree of vacancy and dereliction. Accordingly, the facilitation of "less vulnerable" development at this location in the An Clochán Liath Urban Core is required to regenerate and revitalise the town centre including providing retail and service opportunities at a sustainable location which fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.

ii) **Comprises significant previously developed and/or under-utilised lands:**
The subject lands comprise part of the designated urban core of An Clochán Liath including existing hard-surfaced commercial holding yards. These lands are vacant and are either unused or under-utilised.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are located within the urban core of the town of An Clochán Liath.

iv) **Will be essential in achieving compact and sustainable urban growth:**
As the subject lands are located within existing built-up footprint of An Clochán Liath Town Centre, consist predominately of commercial yards and are within easy walking distances of local schools and retail services. Accordingly, the facilitation of additional development at this location is essential to achieving and maintaining 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 subject lands comprise of an existing developed area within the designated urban core of An Clochán Liath. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). In the event that "less vulnerable" development is proposed within the Flood Zones, a site-specific strategic flood risk assessment will have to be carried out to an appropriate level of detail. Any modifications or mitigatory measures that are identified in any such assessment shall have to be implemented in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:

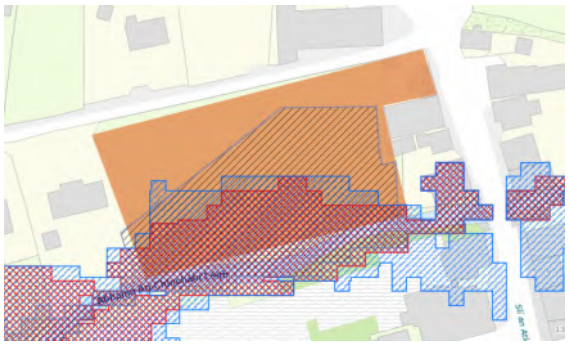
• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian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

Test Result

It is considered that the “Opportunity Site 1” designation passes the justification test.

Justification Test for Opportunity Site 2





Policy ACL-OPP-P-2 of Proposed Variation No.1 to the County Donegal Development Plan 2024-2030 is as follows:

(It is a policy of the Council to) Consider proposals for retail/commercial development on **Opportunity Site 2** where it can be demonstrated that the massing, footprint and height of the proposal, and the nature of the proposed uses(s), are compatible with the adjoining properties. Proposals shall provide for widening of the adjacent road and improvements to the Main Street junction. Proposals shall be required to demonstrate that they shall not give rise to any flood risk by means of a site-specific Flood Risk Assessment. Proposals for residential development will not be acceptable. The finished floor levels of buildings shall be raised above predicted flood levels.

As this site provides for "less vulnerable" development within Flood Zone A a justification test is required.

1. **The urban settlement is targeted for growth under the County Donegal Development Plan 2024-20230.**

   The town of An Clochán Liath is identified as a County Growth Driver and a Gaeltacht Service Town within the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to its location in the west of the County, its connectivity to Glenties and Letterkenny, and its large rural hinterland. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. The Development Plan's Core Strategy identifies a housing target of 151 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**

   The subject lands at risk from flooding lie at a riverside location and directly adjacent to the Waterfront Area yet in close proximity to Main Street and the Town Centre. Opp Site 2 is within the designated urban core of the town. An Clochán Liath Town Centre has suffered from a degree of vacancy and dereliction. Accordingly, the facilitation of "less vulnerable" development at this location in the An Clochán Liath Urban Core is required to regenerate and revitalise the town centre including providing retail and service

opportunities at a sustainable location which fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.

ii) **Comprises significant previously developed and/or under-utilised lands:**
The subject lands comprise part of the designated urban core of An Clochán Liath. This designation constitutes a greenfield site and thus, given its location within the urban core of the town, is highly under-utilised.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are located within the urban core of the town of An Clochán Liath.

iv) **Will be essential in achieving compact and sustainable urban growth:**
As the subject lands are located within existing built-up footprint of An Clochán Liath Town Centre, consist predominately of grassed undeveloped ground, and are within easy walking distances of local schools and retail services, the facilitation of additional development at this location is essential to achieving and maintaining 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 subject lands comprise of an existing developed area within the designated urban core of An Clochán Liath. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). In the event that "less vulnerable" development is proposed within the Flood Zones, a site-specific strategic flood risk assessment will have to be carried out to an appropriate level of detail. Any modifications or mitigatory measures that are identified in any such assessment shall have to be implemented in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate.

The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result

It is considered that the "Opportunity Site 2" designation passes the justification test.

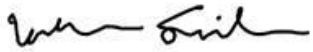
Opportunity Site 4
This designation was amended to exclude any areas where there was peripheral inundation by Flood Zone A and Flood Zone B. Where this previously occurred the zoning was amended at the affected areas to a designation of Open Space and Recreation.

All Established Development 1 Zonings that were Overlapped by Flood Zones

Any such intersections have been amended to "Established Development 2".

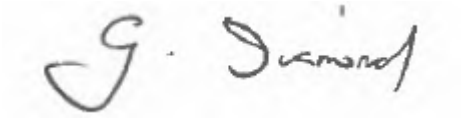
All Local Environment 1 Zonings that were Overlapped by Flood Zones

Any such intersections have been amended to "Local Environment 2".



_____ DATE: 8/09/25

Killian Smith
Executive Planner
Forward Planning Team



_____ DATE: 8/09/25

Graham Diamond
Senior Executive Planner

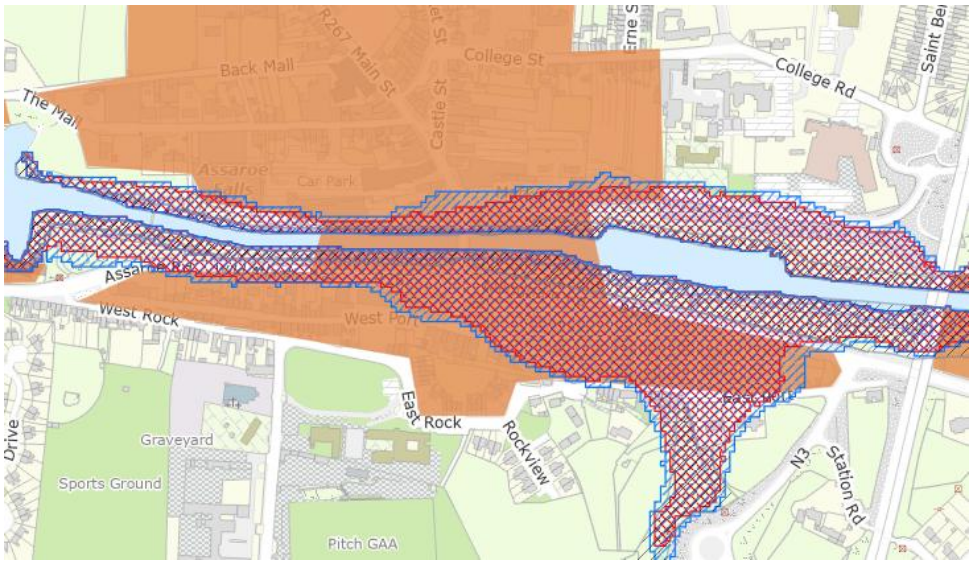
Appendix B.2

Donegal County Council Justification Tests

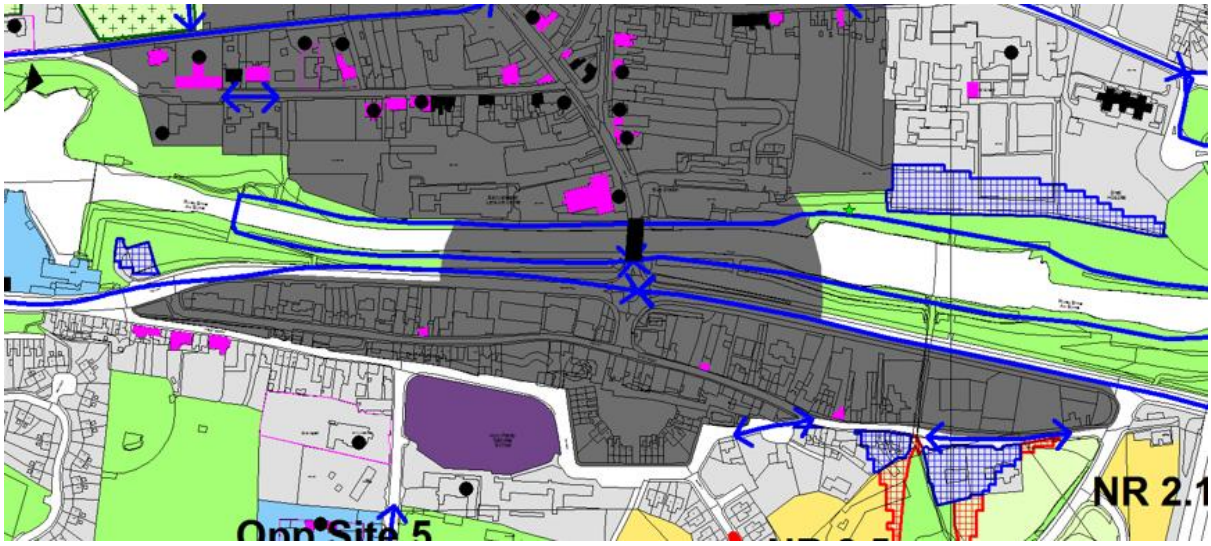
Ballyshannon

Justification Test for Development within the Urban Core/Town Centre Zoning in Ballyshannon located within Flood Risk Areas.

It is proposed that the part of Ballyshannon's Town Centre which lies within CDP 2024 SFRA High End Future Scenario Flood Zone A and B and SST 2018 SFRA Flood Zone A and B be zoned as Urban Core providing for Highly Vulnerable (e.g. residential) and Less Vulnerable (e.g. retail and commercial) development. The Development Plan Justification Test is detailed hereunder:



Excerpt from High End Future Scenarios Flood Maps showing that part of lands zoned as Urban Core within Flood Zones A & B



Excerpt of Map 22.1 showing location of Urban Core Zoning in Ballyshannon

1. **The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.**
   Ballyshannon occupies a strategic location at the southern Gateway to the county, on the N15 National route and the Atlantic Economic Corridor. The town is identified as a Service Town within Section 3.3.3 of the County Donegal Development Plan 2024-2030 providing

important local retail, service and employment functions. The Development Plan's Core Strategy identifies a housing target of 172 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   The subject lands at risk from flooding are an integral part the historic town centre of Ballyshannon and include areas around East Port Road and Allingham Road and part of the Ballyshannon Architectural Conservation Area. Ballyshannon Town Centre has suffered from a significant degree of vacancy and dereliction (including in particular around East Port Road) and population decline. Accordingly, the facilitation of residential and commercial development at this location in Ballyshannon Town Centre is required to regenerate and revitalise the town centre including providing town centre living, retail and service opportunities at a sustainable location which fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.
   ii) **Comprises significant previously developed and/or under-utilised lands:**
   The subject lands comprise part of the historic town centre of Ballyshannon including existing residential and commercial buildings along the East Port and Allingham Roads, and their associated back lands.
   iii) **Is within or adjoining the core of an established or designated urban settlement:**
   The subject lands are located within the historic core of Ballyshannon Town Centre.
   iv) **Will be essential in achieving compact and sustainable urban growth:**
   As the subject lands are located within existing built-up footprint of Ballyshannon Town Centre, consist predominately of existing residential and commercial buildings and associated backlands and are otherwise within easy walking distances of local schools and retail services. Accordingly, the facilitation of additional development at this location is essential to achieving and maintaining 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 subject lands comprise of an existing developed area within the historic town Centre of Ballyshannon. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "highly vulnerable" or "less vulnerable" development can be permitted at these locations the proposal shall need to be subjected to a site-specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.**
   Sources consulted indicate that a portion of the zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification

test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site-specific FRA should consider the following:

• FRAs should address surface water management for development, demonstrating consideration of County Development Plan Flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.

• FRAs should consider the hydromorphological impacts on riparian corridors.

• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.

• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

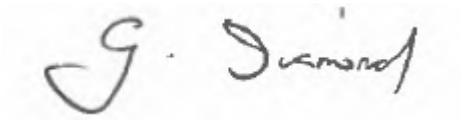
Test Result

It is considered that Opportunity Site 3 passes the Development Plan Justification Test.



_____**DATE: 17/09/2025**

John McFeely
Executive Planner
Forward Planning Team
ENDORSED BY:

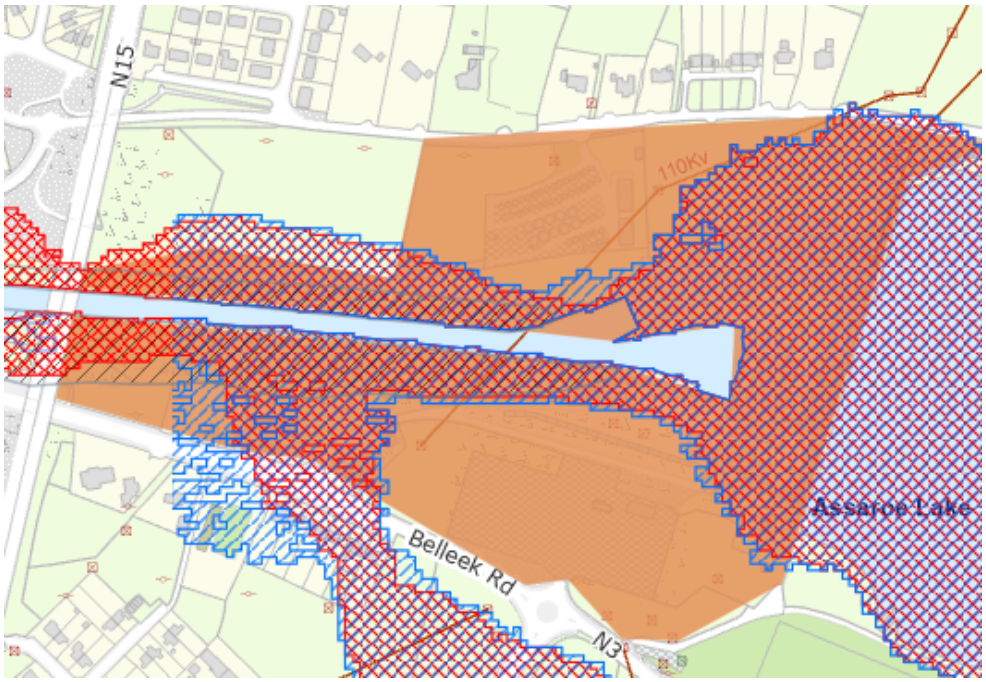


_____ **DATE: 17/09/2025**

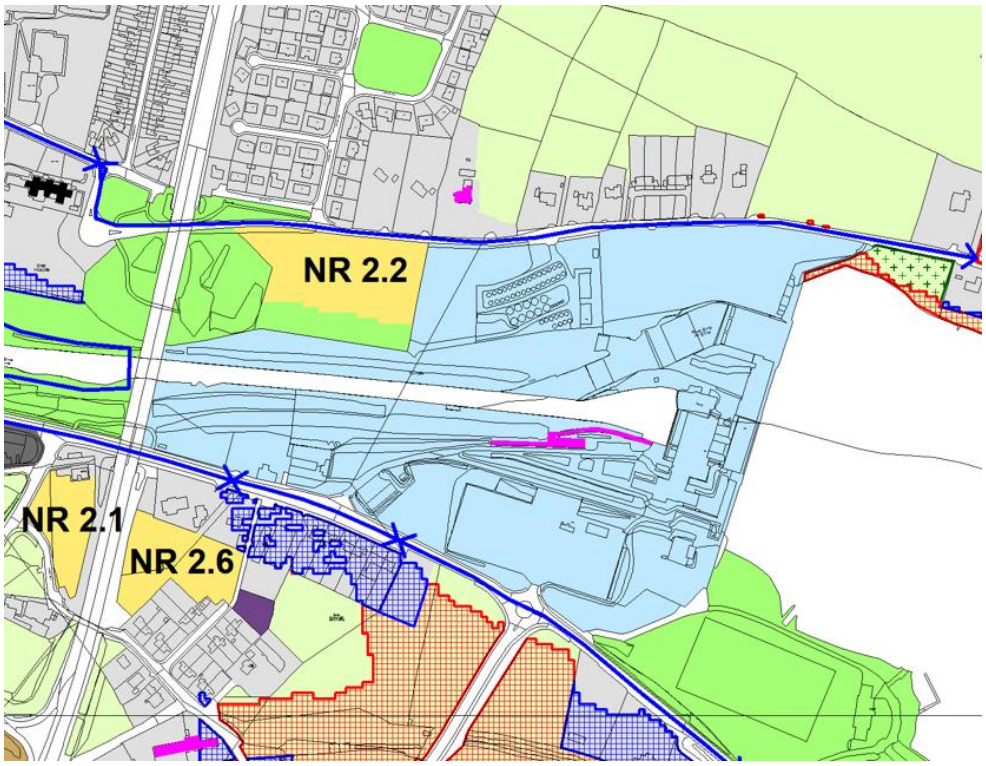
Graham Diamond
Senior Executive Planner
Forward Planning Team

Justification Test for Development within the Transport and Utilities Zoning in Ballyshannon located within Flood Risk Areas.

It is proposed that the part of the Cathleen Fall's HEP Station site which lies within CDP 2024 SFRA High End Future Scenario Flood Zone A and B and SST 2018 SFRA Flood Zone A and B be zoned as Transport and Utilities which facilities Highly Vulnerable Development (i.e. the HEP Station and associated transmission infrastructure). The Development Plan Justification Test is detailed hereunder:



Excerpt from High End Future Scenarios Flood Maps showing that part of lands zoned as Transport and Utilities are within Flood Zones A & B



Excerpt of Map 22.1 showing location of Transport and Utilities Zoning in Ballyshannon

1. **The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.**
   Ballyshannon occupies a strategic location at the southern Gateway to the county, on the N15 National route and the Atlantic Economic Corridor. The town is identified as a Service Town within Section 3.3.3 of the County Donegal Development Plan 2024-2030 providing important local retail, service and employment functions. The Development Plan's Core Strategy identifies a housing target of 172 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   The subject lands part of the operational site of the ESB owned Cathleen's Falls Hydro Electric Power Station which constitutes an integral of Ireland's electricity generating infrastructure and is functionally tied to this location. The delivery of a reliable electrical supply is considered essential to the future growth of Ballyshannon and the wider area.
   ii) **Comprises significant previously developed and/or under-utilised lands:**
   The subject lands comprise part of the operational site of the ESB owned Kathleen's Falls Hydro Electric Power Station.
   iii) **Is within or adjoining the core of an established or designated urban settlement:**
   The subject lands comprise of an established electricity generating infrastructure site within the settlement of Ballyshannon.
   iv) **Will be essential in achieving compact and sustainable urban growth:**
   This long-established electricity generating infrastructure site is within the existing built-up footprint of Ballyshannon.
   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:**
   As the site comprises of a Hydro Electric Power station and ancillary infrastructure it is functionally tied to this exact riverside geographic location and cannot be relocated to areas at lower risk of flooding elsewhere.

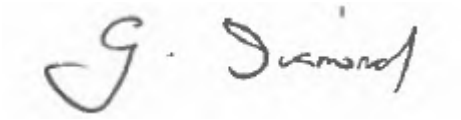
3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.**
   Sources consulted indicate that a portion of the zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site-specific FRA should consider the following:
   • FRAs should address surface water management for development, demonstrating consideration of County Development Plan Flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.

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

Test Result
It is considered that the Transport and Utilities Zoning passes the Development Plan Justification Test.



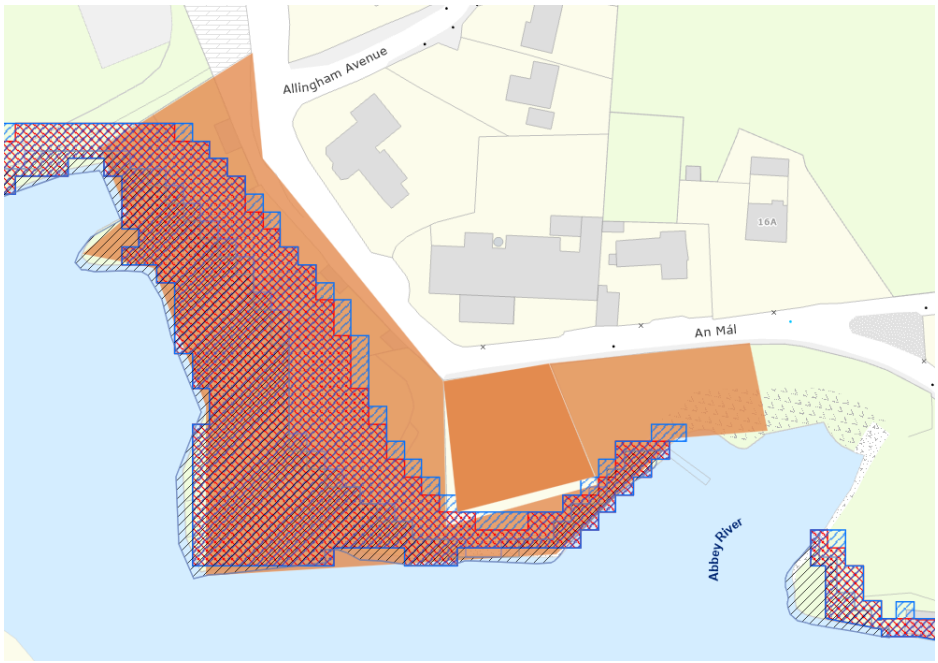
_____**DATE: 17/09/2025**
John McFeely
Executive Planner
Forward Planning Team
ENDORSED BY:



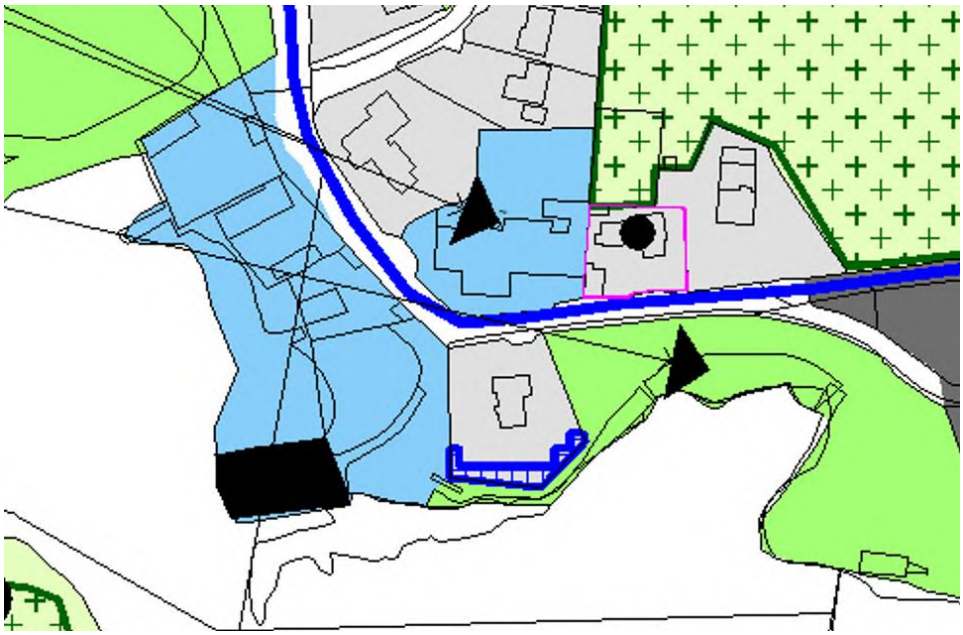
_____ **DATE: 17/09/2025**
Graham Diamond
Senior Executive Planner
Forward Planning Team

Justification Test for Development within the Opportunity Site 3 (Mall Quay) Zoning in Ballyshannon located within Flood Risk Areas.

It is proposed that Opportunity Site 3, a significant part of which lies within both the SST Flood zone A and B and the CDP 2024 SFRA High End Future Scenario Flood Zone A and B, be zoned as an Opportunity Site providing for inter alia less vulnerable developments (e.g. tourism developments such as a café, public conveniences/changing facilities) as well as water compatible developments. The Development Plan Justification Test is detailed hereunder:



Excerpt from High End Future Scenarios Flood Maps showing that lands zoned as Opportunity Site 3 are within Flood Zones A & B



Excerpt of Map 22.1 showing location of Opportunity Site 3 in Ballyshannon

1. **The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.**
   Ballyshannon occupies a strategic location at the southern Gateway to the county, on the N15 National route and the Atlantic Economic Corridor. The town is identified as a Service Town within Section 3.3.3 of the County Donegal Development Plan 2024-2030 providing important local retail, service and employment functions. The Development Plan's Core Strategy identifies a housing target of 172 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   The subject lands have been identified as part of the Ballyshannon Regeneration and Action Plan as having significant potential for marine leisure, passive recreation, a café, public conveniences/changing, whilst also identifying the need to retain its Built Heritage features and improve north south pedestrian connectivity
   ii) **Comprises significant previously developed and/or under-utilised lands:**
   The subject lands consist of historic underutilised old quays and walled areas along the River Erne Estuary.
   iii) **Is within or adjoining the core of an established or designated urban settlement:**
   The subject lands lie adjacent to (and within easy walking distance of) the Urban Core of Ballyshannon.
   iv) **Will be essential in achieving compact and sustainable urban growth:**
   The facilitation of recreational, marine leisure, tourism, community, and public conveniences/changing related developments (whilst protecting the existing built heritage) on this key historic marine related site within walking distance of Ballyshannon Town Centre is essential in achieving the compact and sustainable urban growth of Ballyshannon.
   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 Mall Quay site presents a unique opportunity to provide recreational, marine leisure, tourism, community, and public conveniences/changing related developments (whilst protecting the existing built heritage) on this historic marine related site which cannot be replicated elsewhere.

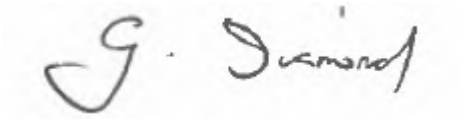
3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.**
   Sources consulted indicate that a portion of the zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail

should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site-specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of County Development Plan Flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels as may be required and demonstrating no increase in flood risk elsewhere

Test Result
It is considered that Opportunity Site 3 passes the Development Plan Justification Test.



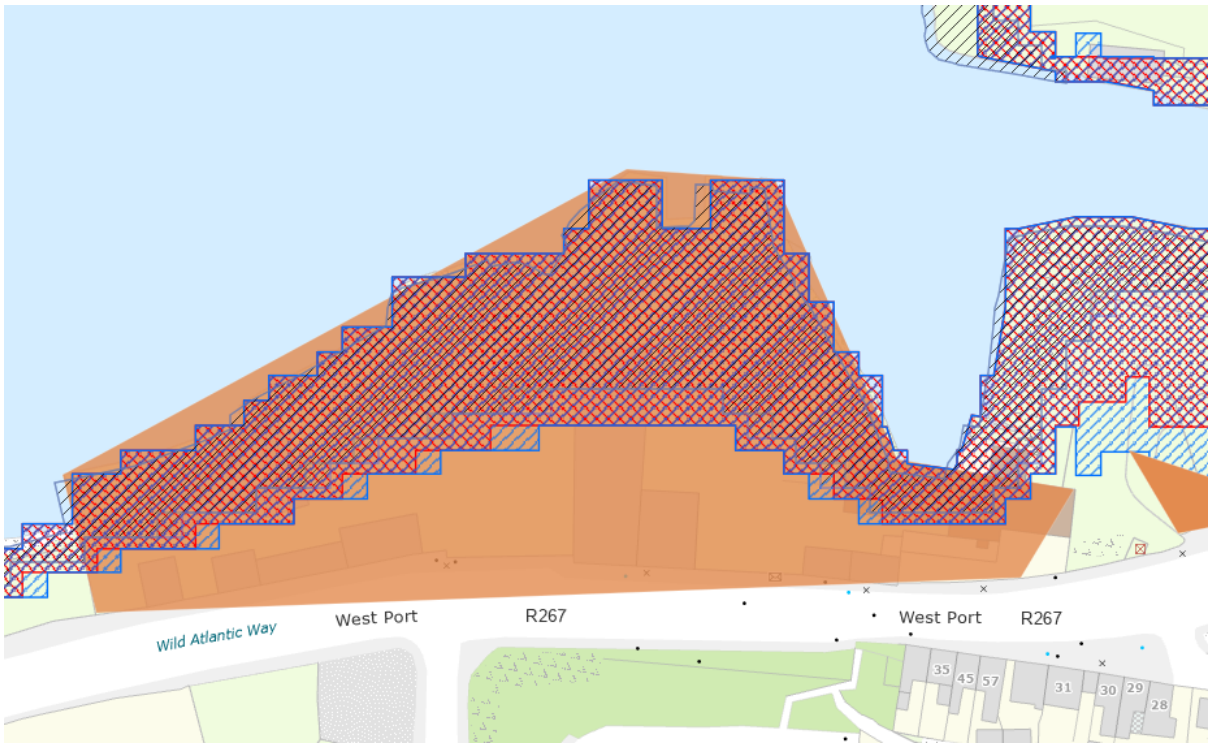
_____**DATE: 17/09/2025**
John McFeely
Executive Planner
Forward Planning Team
ENDORSED BY:



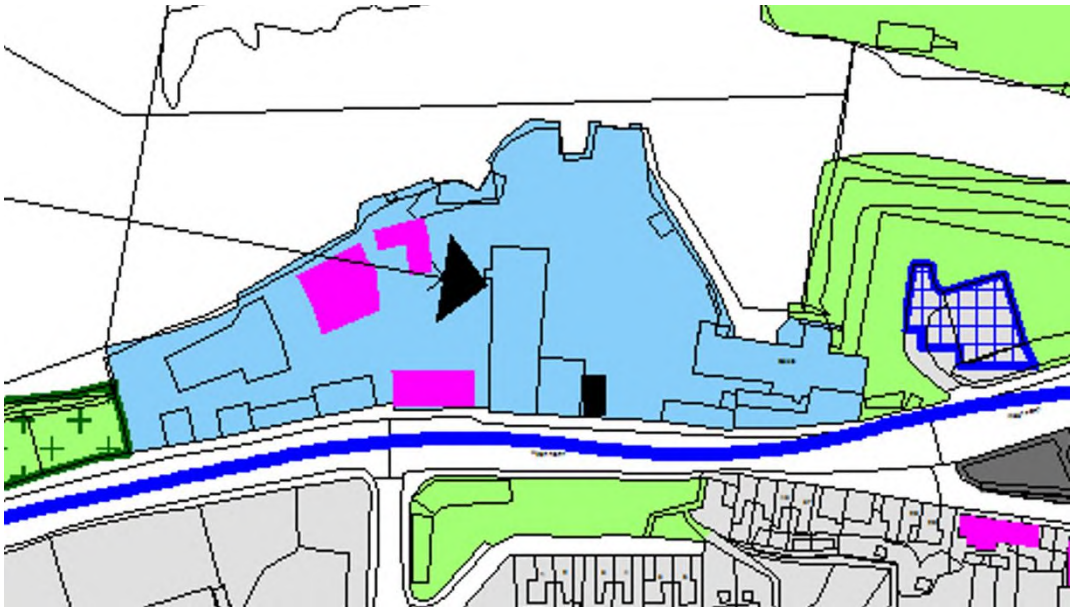
_____ **DATE: 17/09/2025**
Graham Diamond
Senior Executive Planner
Forward Planning Team

Justification Test for Development within the Opportunity Site 4 (Heiton's Site) Zoning in Ballyshannon located within Flood Risk Areas.

It is proposed that Opportunity Site 4 which lies partially, within SST 2018 SFRA Flood Zone A and B and CDP 2024 SFRA High End Future Scenario Flood Zone A and B, be zoned as an Opportunity site providing for Highly Vulnerable and Less Vulnerable Development (Tourism, Cultural and Residential Development). The Development Plan Justification Test is detailed hereunder:



Excerpt from High End Future Scenarios Flood Maps showing that lands zoned as Opportunity Site 4 are within Flood Zones A & B



Excerpt of Map 22.1 showing location of Opportunity Site 4 in Ballyshannon

1. **The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic strategy, statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.**
   Ballyshannon occupies a strategic location at the southern Gateway to the county, on the N15 National route and the Atlantic Economic Corridor. The town is identified as a Service Town within Section 3.3.3 of the County Donegal Development Plan 2024-2030 providing important local retail, service and employment functions. The Development Plan's Core Strategy identifies a housing target of 172 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   This largely vacant/derelict historic site is located at the south western gateway of the town, originally contained the quays of Ballyshannon Port, a distillery, the Erne (Corn and Saw) Mill, warehouses, and timber yards and still retains the old distillery building (NIAH 40852069) and historic building facades along the R267/West Port Road. The regeneration of the site for heritage led uses including tourism, commercial and residential development is listed as Action 1C of the Ballyshannon Regeneration and Action Plan. Furthermore, the Office of the Planning Regulator has identified the need for the regeneration of the site in their pre-draft submission on the Proposed Variation. As such is considered that the regeneration of this key opportunity site is essential to facilitate the overall regeneration of Ballyshannon.
   ii) **Comprises significant previously developed and/or under-utilised lands:**
   The site previously contained the quays of Ballyshannon Port, a distillery, the Erne (Corn and Saw) Mill, warehouses, and timber yards and now lies vacant/derelict and underutilised.
   iii) **Is within or adjoining the core of an established or designated urban settlement:**
   The subject lands lie adjacent to (and within easy walking and cycling distance of) Ballyshannon Town Centre.
   iv) **Will be essential in achieving compact and sustainable urban growth:**
   The development of this historic site (lying adjacent to, and within easy walking and cycling distance of, the historic town centre) for a mixture of tourism, community and residential development will help to achieve the compact and sustainable growth of Ballyshannon.
   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:**
   This site presents a unique opportunity to regenerate a vacant, derelict and underutilised historic site for a mix of tourism/cultural, residential, public open/vent space uses. Such a regeneration opportunity is therefore intrinsically linked to this particular site and cannot be replicated on other areas at lower risk of flooding.

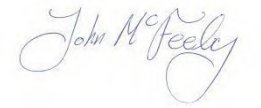
3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.**
   Sources consulted indicate that a portion of the zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has

been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site-specific FRA should consider the following:

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

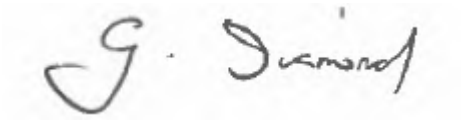
Test Result

It is considered that Opportunity Site 4 passes the Development Plan Justification Test.



_____**DATE: 17/09/2025**

John McFeely
Executive Planner
Forward Planning Team
ENDORSED BY:



_____ **DATE: 17/09/2025**

Graham Diamond
Senior Executive Planner
Forward Planning Team

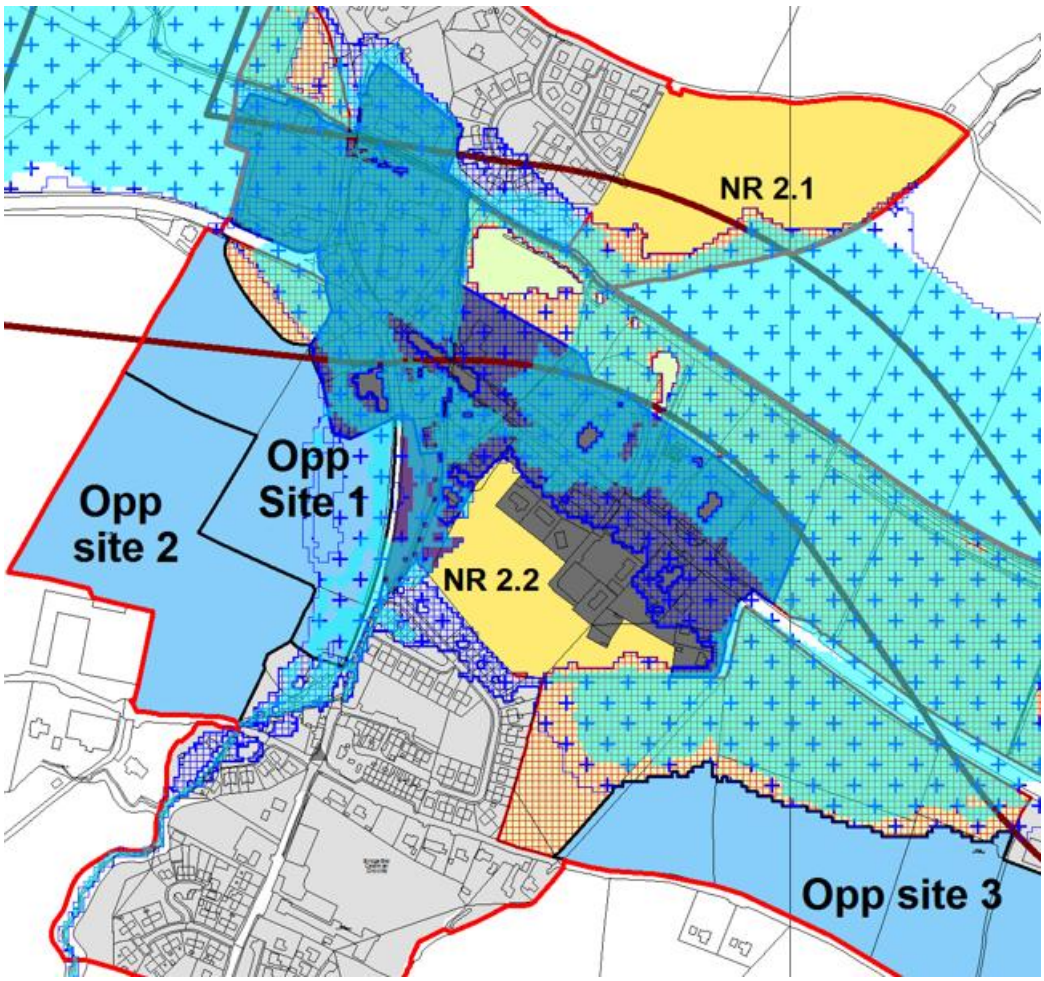
Appendix B.3

Donegal County Council Justification Tests

Bridgend

Justification Test for Development within the Urban Core/Town Centre Zoning in Bridgend located within Flood Risk Areas.

It is proposed that areas peripheral to the Skeoge River, Bridgend that are extrapolated as being within Flood Zones A & B in the High End Future Scenario Indicative Flood Plain Maps be included as part of the urban core/town centre designation for Bridgend. The justification test carried out for this aspect of the proposed urban core designation is detailed hereunder.



Excerpt from High End Future Scenarios Flood Maps showing that lands zoned as "Urban Core" are within Flood Zones A & B.

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

   Bridgend sits in a strategic position in east Donegal adjoining the border with Northern Ireland, and Derry City. It is located on the route of the N13 National Primary Road. This road is the primary transport corridor within the North-West City Region of Letterkenny-Derry-Strabane and the importance of the road is reflected in its inclusion in Ireland's Trans-European Transport Network roads (or TEN-T). It is also a key gateway to the Wild Atlantic Way. The County Development Plan 2024-2029 (CDP) recognises that the County's towns and villages are at the centre of rural communities because they are

important locations for service delivery, gathering, expression of identity, rural enterprise and social and community supports. The CDP recognises the importance of rural towns and villages in supporting the wider rural community and therefore seeks to enable their revitalisation and regeneration as a key strategic intervention. To this end, the Core Strategy targets approximately 18% of the projected population growth towards the smaller settlements of the County. This approach is consistent with national policy as contained in the NPF and 'Our Rural Futures, 2021-2025' (Chapter 5: Revitalising Rural Towns and Villages') and regional policy as contained in the RSES (RPO 3.4). RPO 3.13 supports the role of smaller and medium-sized towns and requires the identification of in the Development Plan of such settlements in the Core Strategy. Bridgend has been identified as a settlement of this nature.

The town is served by an Irish Water maintained wastewater treatment plant (WWTP) providing for mechanical primary and secondary treatment, followed by tertiary treatment in the form of a willow plantation. The Uisce Éireann Wastewater Capacity Register (published Dec 2024) states that Ceann an Droichid/Bridgend has no spare capacity at present. Whilst a Stage 2 Preliminary Business case is being progressed by UÉ for the upgrade of the Ceann an Droichid/Bridgend wastewater treatment plant, UÉ have advised that the project will not commence construction during the 2025-2029 period.

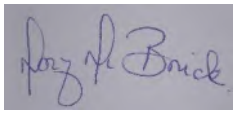
2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   - i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
     The subject lands at risk from flooding are located both sides of the N13, the central arterial spine which runs through the town centre, forming a natural location for the expansion of the urban core. The zoned lands are necessary to facilitate the cohesive and sustainable planned expansion of the town centre in a sequential manner; there are no alternative locations to appropriately facilitate such expansion. The expansion of the town centre will allow the appropriate development of Bridgend, and retain the vitality of the urban core. The proposal fully accords with the Governments Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out in the National Planning Framework.
   - ii) **Comprises significant previously developed and/or under-utilised lands:**
     The subject lands comprise of underutilised brownfield and greenfield sites and associated back lands which are adjacent to the N13 main arterial route through the town centre.
   - iii) **Is within or adjoining the core of an established or designated urban settlement:**
     The subject lands are located the urban core of Bridgend.
   - iv) **Will be essential in achieving compact and sustainable urban growth:**
     The subject lands are located within existing built-up footprint of Bridgend Town Centre, consist predominately of existing residential and commercial buildings and associated backlands and are otherwise within easy walking distances of local schools and retail services. Accordingly, the facilitation of additional development at this location is essential to achieving and maintaining 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 subject lands comprise of an existing developed area within the urban core of Bridgend. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "highly vulnerable" or "less vulnerable" development can be permitted at these locations the proposal shall need to be subjected to a site-specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.**
Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of County Development Plan Flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Recommendation:

The proposed zoning of this site **Passes** the justification test for the reasons set put above.



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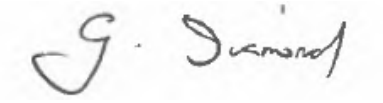


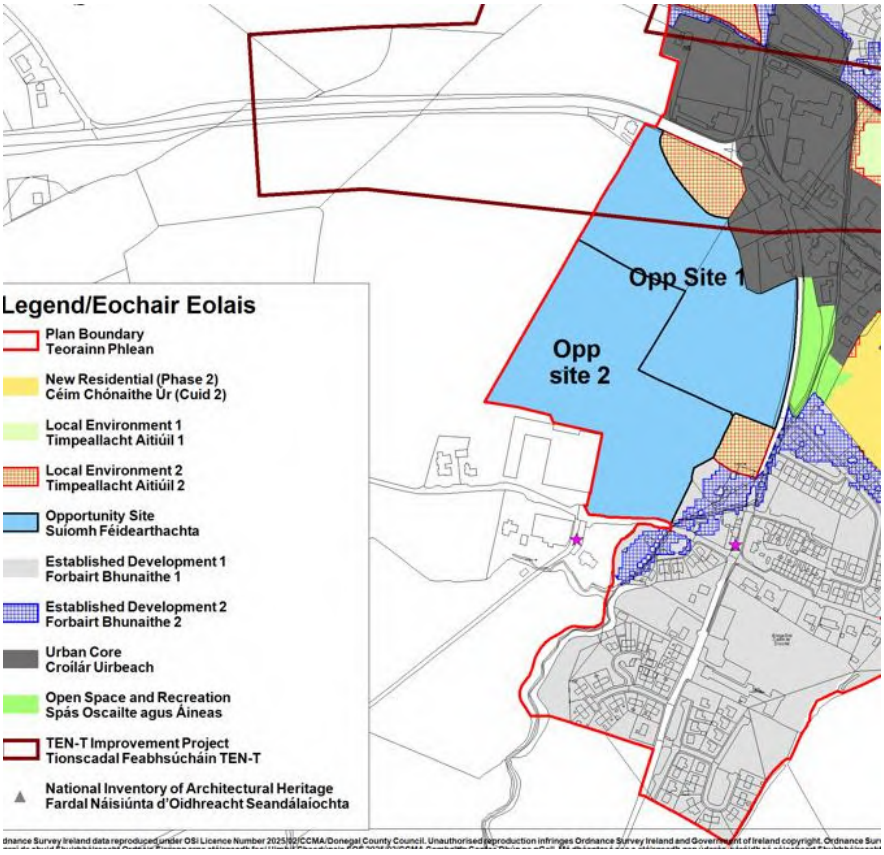
Date: 17/09/202

Mary McBride
Executive Planner
Froward Planning Team

Graham Diamond
Senior Executive Planner
Forward Planning Team

Justification Test for Development within Opportunity Site 1 in Bridgend located within Flood Risk Areas.

Part of Opportunity Site 1 is prone to inundation by Flood Zone A and Flood Zone B in the High End Future Scenario indicative flood mapping. It is proposed that any future development proposals within Opportunity Site 1 will be required to have regard to Flood Zones A & B as per the Map below and subject to the required flood risk mitigation measures included as part of any planning application. The justification test carried out for this designation is detailed hereunder.



Excerpt from Bridgend Land-use Map23.1 showing lands zoned as "Opportunity Site 1" which have been amended to have regard for High End Future Scenarios Flood Maps (Flood Zones A&B).

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

   Bridgend sits in a strategic position in east Donegal adjoining the border with Northern Ireland, and Derry City. It is located on the route of the N13 National Primary Road. This road is the primary transport corridor within the North-West City Region of Letterkenny-Derry-Strabane and the importance of the road is reflected in its inclusion in Ireland's Trans-European Transport Network roads (or TEN-T). It is also a key gateway to the Wild Atlantic Way.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   Within Opportunity Site 1 both SFRA Flood Zones A & B have been identified, and said lands are said to be at risk from flooding. The specific lands in question form part of the road frontage lands which are immediately adjacent to the L-2031-4 (Local Primary Road to the east) and south of the N13 (National Primary), the main arterial spine which runs through the town centre/urban core. This is a greenfield site which is adjacent to the town centre and which has the capacity to strengthen the strategic function of Bridgend within the County. This Opportunity Site will contribute to the natural and appropriate expansion of the urban core and thus adding to the viability of the town. This proposal fully accords with the Governments Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out in the National Planning Framework. Any future development proposals within Opportunity Site 1 will be required to have regard to any required flood risk mitigation measures included as part of any planning application.

   The southernmost portion of the site which contains both Flood Zones A & B shall be removed from Opportunity Site 1 and replaced with Local Environment 2 Land Use zoning (as mapped above).

   ii) **Comprises significant previously developed and/or under-utilised lands:**
   The subject lands comprise an undeveloped and underutilised greenfield site that adjoins Opportunity Site 2 to the south west and which are immediately adjacent to the L-2031-4 (Local Primary Road to the east) and south of the N13 (National Primary), the main arterial spine which runs through the town centre/urban core.
   iii) **Is within or adjoining the core of an established or designated urban settlement:**
   The subject lands are located adjacent to the urban core of Bridgend.
   iv) **Will be essential in achieving compact and sustainable urban growth:**
   The subject lands are located within walking distance of the existing built-up footprint of Bridgend Town Centre by the L-2031-4 Local Primary Road. They consist of a greenfield site. Said lands are within easy walking distances of town centre, local schools and retail services. Accordingly, the facilitation of additional development at this location is essential to achieving and maintaining 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 subject lands comprise of un-utilised and undeveloped area which are of the closest proximity to the urban core of Bridgend and are an opportune location which could provide for "less vulnerable" type of development . In the event that "less vulnerable" development is proposed within the Flood Zones, a site-specific strategic flood risk assessment will have to be carried out to an appropriate level of detail. Any modifications or mitigatory measures that are identified in any such assessment shall have to be implemented in full.

3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard**

and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.

Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site-specific FRA should consider the following:

• FRAs should address surface water management for development, demonstrating consideration of County Development Plan Flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.

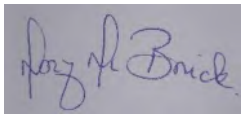
• FRAs should consider the hydromorphological impacts on riparian corridors.

• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.

• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

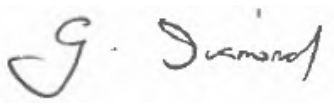
Recommendation:

The proposed zoning of this site **Passes** the justification test for the reasons set put above.



_____ Date: 17/09/25

Mary McBride
Executive Planner
Froward Planning Team



_____ Date: 17/09/2025

Graham Diamond
Senior Executive Planner
Forward Planning Team

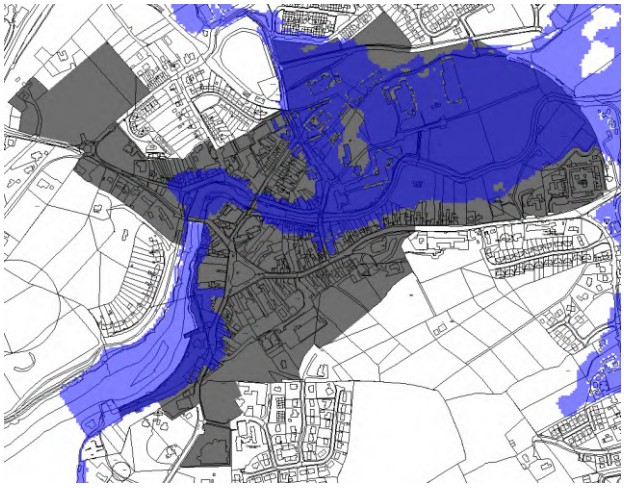
Appendix B.4

Donegal County Council Justification Tests

Donegal Town

Justification Test for Development on lands zoned as Urban Core

It is proposed that certain town centre areas that are extrapolated as being within Flood Zones A & B in the High End Future Scenario Indicative Flood Plain Maps be included as part of the 'urban core' designation for Donegal Town. The justification test for the proposed urban core designation is detailed hereunder.



Excerpt from High End Future Scenarios Flood Maps showing that certain lands zoned as "Urban Core" are within Flood Zones A & B

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

   Baile Dhún na nGall, Donegal Town, is strategically located at a key point along the TEN-T Network of National Roads, connecting the region via the N15 and N13, north-south from Derry to Sligo and at a key junction of the N56 linking to the west of the County and the route of the Wild Atlantic Way. Donegal Town is identified as a 'County Growth Driver, within Section 3.3.3 of the County Donegal Development Plan 2024-2030 recognising the important role of the town to driving growth in the locality and also serving capacities. The Development Plan's Core Strategy identifies a housing target of 566 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**

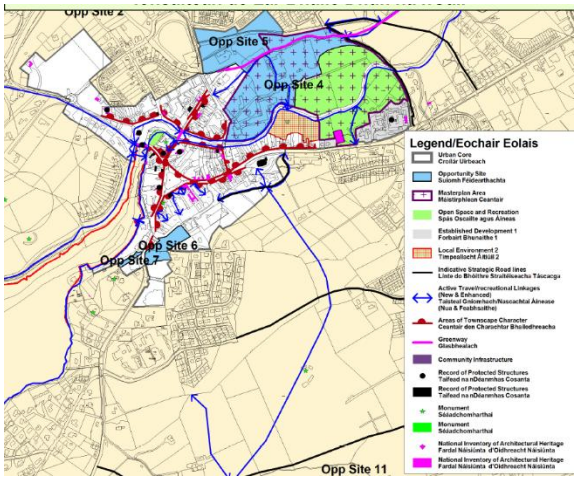
   The subject lands encompass and delineate the entire urban core of the town and overlay an area that includes specific and individual zonings. The zoning will allow for its development and enhancement of uses including retail, residential, commercial, civic and other uses.

   The Urban Core zoning is essential to provide for the further growth, development and regeneration of Donegal Town.

   The proposal fully accords with the Governments Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out in the National Planning Framework.

ii) **Comprises significant previously developed and/or under-utilised lands:**
The subject lands include a significant number of brownfield and underutilised lands. Opportunity Sites 4, 5, 6 and 7 are specifically identified as strategically located sites owing to their location, and their potential to provide for the sustainable, appropriate and sequential growth of the town.

iii) **Is within or adjoining the core of an established or designated urban settlement:** The subject lands encompass all of the urban core of the town and are subject to individual zonings. The image below is from the draft Land Use zoning map, Town Centre Insert and identifies all of the zonings within the Urban Core.



iv) **Will be essential in achieving compact and sustainable urban growth:**
The development of the Urban Core as identified, is essential to achieve compact and sustainable 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:**
Donegal Town has a compact and contained historic urban form centred around an historic 'Diamond' from which the town has grown incrementally. Further development of town centre uses within the urban core is necessary to achieve compact and sustainable growth, and there are no alternative locations for this type of use within the Donegal Town Plan boundary.
The proposed zoning accords with the principle of the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out in the National Planning Framework

3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.**
Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management

Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:

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

Recommendation:

The proposed zoning of this site **Passes** the justification test for the reasons set put above.

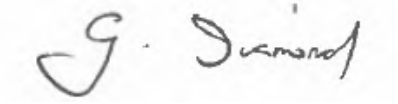


_____ DATE: 17/09/25

Alana Green

Executive Planner

Forward Planning Team



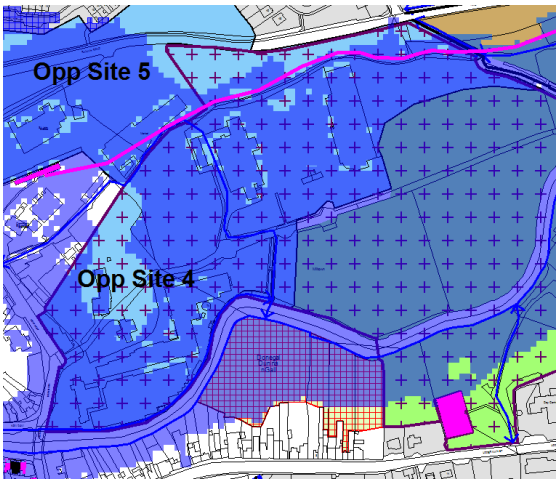
_____ DATE: 17/09/25

Graham Diamond

Senior Executive Planner

Justification Test for Development within Opportunity Site 4

It is proposed that the land identified as Opportunity Site 4 be included as part of the urban core/town centre designation for Donegal Town. The justification test carried out for this aspect of the proposed urban core designation is detailed hereunder.



Excerpt from High End Future Scenarios Flood Maps showing that lands zoned as Opp Site 4 are within Flood Zones A & B

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

   Baile Dhún na nGall, Donegal Town, is strategically located at a key point along the TEN-T Network of National Roads, connecting the region via the N15 and N13, north-south from Derry to Sligo and at a key junction of the N56 linking to the west of the County and the route of the Wild Atlantic Way. Donegal Town is identified as a 'County Growth Driver, within Section 3.3.3 of the County Donegal Development Plan 2024-2030 recognising the important role of the town to driving growth in the locality and also serving capacities. The Development Plan's Core Strategy identifies a housing target of 566 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i. **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   The subject lands at risk from flooding are within the urban core of the town,in a central location within the settlement forming a natural location for expansion of the town centre. The zoned lands are necessary to foster a cohesive and sustainable planned expansion of the town centre in a sequential manner; there are no alternative locations to appropriately facilitate appurtenant expansion. The expansion of the town centre into its natural hinterland will allow the sustainable and concentric development of Donegal Town, and retaining the vitality and vibrancy of the urban core. The proposal fully accords with the Governments Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out in the National Planning Framework.

ii. **Comprises significant previously developed and/or under-utilised lands:**
The subject lands comprise underutilised brownfield land, containing 2 large, dilapidated factory/warehouse buildings. The site has dual frontage along two key access roads into the centre of the town, and a disused access road traverses the site.

iii. **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are contiguous to the town centre and within the identified t urban core of Donegal Town.

iv. **Will be essential in achieving compact and sustainable urban growth:**
The opportunity site immediately abuts the existing historic urban core of Donegal Town; the development of this site for town centre uses will allow the town to grow in a sequential and organic manner fostering compact growth. This site is within easy walking distance of the town centre, bus stops and the planned Greenway and Greenway hub and would be compliant with the Governments Sustainable Mobility Policy.

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:**
Donegal Town has a compact and contained historic urban form centred around an historic 'Diamond' from which the town has grown incrementally. The identified opportunity lands form a natural expansion of the town centre; there are no further undeveloped lands within the town centre area that would allow sequential growth. The subject lands represent the last remaining undeveloped lands suitable for the concentric expansion of town centre use, further development of this nature could only then be considered on the fringes of the town, physically removed from the urban core.

3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.**
Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate.

The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.

• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

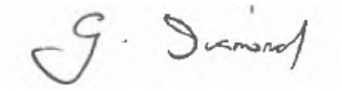
Recommendation:

The proposed zoning of this site **Passes** the justification test for the reasons set put above.



_____ DATE: 17/09/25

Alana Green
Executive Planner
Forward Planning Team

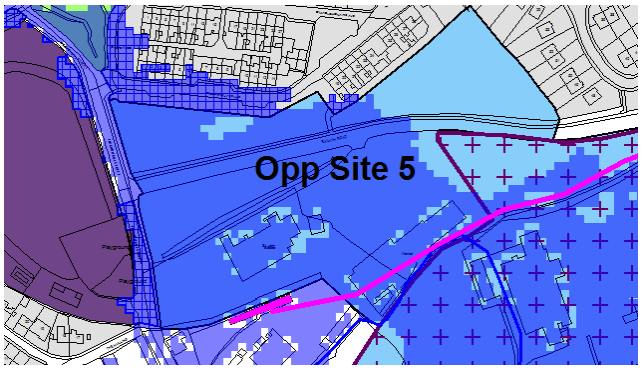


_____ DATE: 17/09/25

Graham Diamond
Senior Executive Planner

Justification Test for Development within Opportunity Site 5

It is proposed that the land identified as Opportunity Site 5 be included as part of the urban core/town centre designation for Donegal Town. The justification test carried out for this aspect of the proposed urban core designation is detailed hereunder.



Excerpt from High End Future Scenarios Flood Maps showing that lands zoned as Opp Site 5 are within Flood Zones A & B

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

   Baile Dhún na nGall, Donegal Town, is strategically located at a key point along the TEN-T Network of National Roads, connecting the region via the N15 and N13, north-south from Derry to Sligo and at a key junction of the N56 linking to the west of the County and the route of the Wild Atlantic Way. Donegal Town is identified as a 'County Growth Driver, within Section 3.3.3 of the County Donegal Development Plan 2024-2030 recognising the important role of the town to driving growth in the locality and also serving capacities. The Development Plan's Core Strategy identifies a housing target of 566 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**

The subject lands at risk from flooding are within the urban core of the town,in a central location within the settlement forming a natural location for expansion of the town centre. The zoned lands are necessary to foster a cohesive and sustainable planned expansion of the town centre in a sequential manner; there are no alternative locations to appropriately facilitate appurtenant expansion. The expansion of the town centre into its natural hinterland will allow the sustainable and concentric development of Donegal Town, and retaining the vitality and vibrancy of the urban core. The proposal fully accords with the Governments Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out in the National Planning Framework.

   ii) **Comprises significant previously developed and/or under-utilised lands:**
   The subject lands comprise of an existing sports club and pitches, a functioning Mart and open space areas associated with adjoining residential developments. The lands have dual road frontage.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are contiguous to the town centre and within the identified t urban core of Donegal Town.

iv) **Will be essential in achieving compact and sustainable urban growth:**
The opportunity site immediately adjoins the existing urban core of Donegal Town and the development of this site for town centre uses will allow the town to grow in a sequential and organic manner fostering compact growth. This site is within easy walking distance of the town centre, bus stops and the planned Greenway and Greenway Hub and would be compliant with the Governments Sustainable Mobility Policy.

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:**
Donegal Town has a compact and contained urban form. The identified opportunity lands are a natural expansion of the town centre; there are no further undeveloped lands within the town centre area that would allow sequential growth. The subject lands represent the last remaining undeveloped lands suitable for the concentric expansion of town centre use, further development of this nature could only then be considered on the edge of the plan, physically removed from the urban core.

3. **The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.**
Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Recommendation:

The proposed zoning of this site **Passes** the justification test for the reasons set put above.

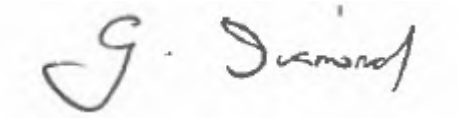


_____ DATE: 17/09/25

Alana Green

Executive Planner

Forward Planning Team



_____ DATE: 17/09/25

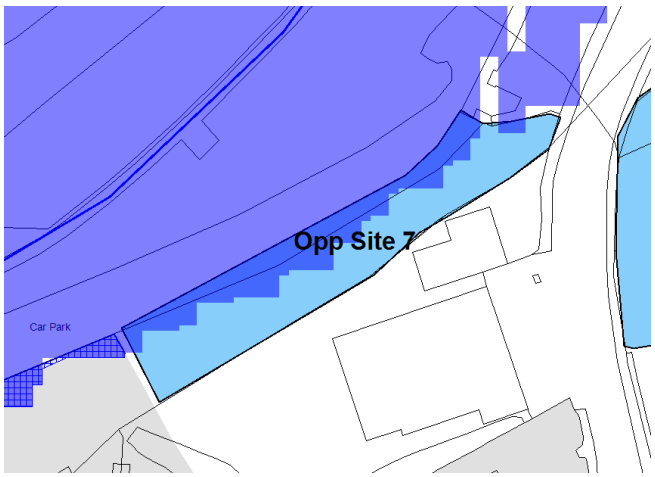
Graham Diamond

Senior Executive Planner

Donegal Town Area Plan:

Justification Test for Development within Opportunity Site 7

It is proposed that the land identified as Opportunity Site 7 be included as part of the urban core/town centre designation for Donegal Town. The justification test carried out for this aspect of the proposed urban core designation is detailed hereunder.



Excerpt from High End Future Scenarios Flood Maps showing that lands zoned as Opp Site 7 are within Flood Zones A & B

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

   Baile Dhún na nGall, Donegal Town, is strategically located at a key point along the TEN-T Network of National Roads, connecting the region via the N15 and N13, north-south from Derry to Sligo and at a key junction of the N56 linking to the west of the County and the route of the Wild Atlantic Way. Donegal Town is identified as a 'County Growth Driver, within Section 3.3.3 of the County Donegal Development Plan 2024-2030 recognising the important role of the town to driving growth in the locality and also serving capacities. The Development Plan's Core Strategy identifies a housing target of 566 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   The subject lands at risk from flooding have been identified to accommodate, inter alia, a landmark building of fine grain in terms of segmented frontage and traditional features together with a notable colour palette. While town centre uses are broadly appropriate, preferred uses include community, pier/harbour related, tourism, small scale retail floorspace or restaurant.

   This landmark site addresses the pier area, and its development would significantly enhance the character and quality of the pier area at the estuary of Donegal Bay, providing a key feature in any forthcoming regeneration strategies.

ii) **Comprises significant previously developed and/or under-utilised lands:**
The site comprises under-utilised lands offering a prime undeveloped site, at a location where appropriate development will increase the profile of the pier.

iii) Is within or adjoining the core of an established or designated urban settlement:
The subject lands are located within the town centre, with a frontage onto the carpark at the pier and with access onto the R267.

iv) Will be essential in achieving compact and sustainable urban growth:
This site is within the town centre, beside the 'Diamond' and adjoining a public car park; the location of the tourist office, the ruins of Donegal Abbey and water associated leisure activities.

The development of this strategic site would support sequential compact growth and efficiently utilizing a vacant, prominent, town centre site.

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:**
Donegal's town centre has a historical compact core with limited scope for brownfield development. The identification of this vacant site for development accords with the principle of the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out in the National Planning Framework.

3. The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.
Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate.
The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.

• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Recommendation:

The proposed zoning of this site **Passes** the justification test for the reasons set put above.

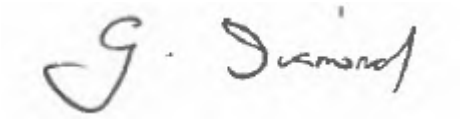


_____ DATE: 17/09/25

Alana Green

Executive Planner

Forward Planning Team



_____ DATE: 17/09/25

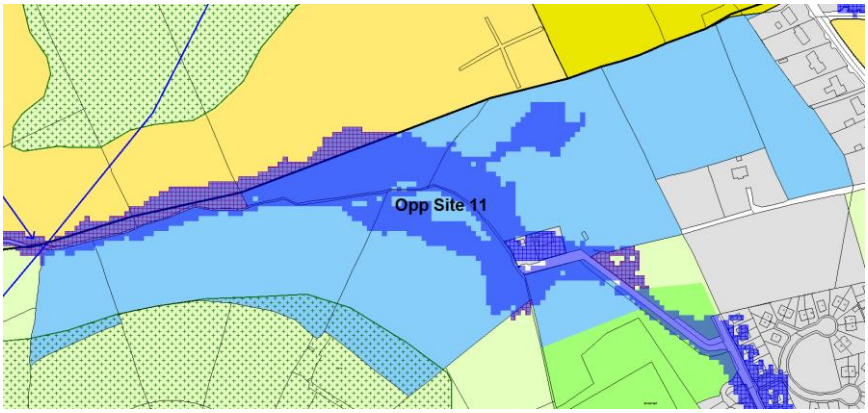
Graham Diamond

Senior Executive Planner

Donegal Town Area Plan:

Justification Test for Development within Opportunity Site 11

It is proposed that areas that are extrapolated as being within Flood Zones A & B in the High-End Future Scenario Indicative Flood Plain Maps be included as part of Opp site 11 in Donegal Town. The justification test carried out for this designation is detailed hereunder.



Excerpt from High End Future Scenarios Flood Maps showing that part of the lands zoned as Opp Site 11 are within Flood Zones A & B

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

   Baile Dhún na nGall, Donegal Town, is strategically located at a key point along the TEN-T Network of National Roads, connecting the region via the N15 and N13, north-south from Derry to Sligo and at a key junction of the N56 linking to the west of the County and the route of the Wild Atlantic Way. Donegal Town is identified as a 'County Growth Driver, within Section 3.3.3 of the County Donegal Development Plan 2024-2030 recognising the important role of the town to driving growth in the locality and also serving capacities. The Development Plan's Core Strategy identifies a housing target of 566 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
   The subject lands at risk from flooding have been identified to accommodate, inter alia, community infrastructure inclusive of a sports and leisure complex and facilities at a strategic location adjacent to existing residential developments and zoned residential lands,1km from the town centre. The nature of such development is that the design of the overall campus must have regard to the on-site flooding designations and incorporate fully considered and planned flooding alleviation on this, and adjacent, sites.

ii) **Comprises significant previously developed and/or under-utilised lands:**
The subject lands comprise under-utilised lands offering a prime location for the necessary provision of recreation and community type uses, inclusive of sports and leisure facilities at an accessible and serviced location.

iii) Is within or adjoining the core of an established or designated urban settlement:
The subject lands are located within Donegal Town, 1km from the town centre within an area of existing and planned residential development of a suburban density with proposed access to Abbey Vocational School/ College, there is existing from the Old Laghy Road with existing footpath and lighting.

iv) Will be essential in achieving compact and sustainable urban growth:
This site is within an existing residential area, and when developed, will provide alternative pedestrian and cycle access from the main road frontage to a school campus, Abbey Vocational School. In addition, the proximity of the site to the centre of the town and accessibility by foot and bicycle allows for sustainable urban growth and active travel, compliant with the Governments Sustainable Mobility Policy.
The development of this site for community use will allow the town to grow in a sustainable, sequential and organic manner fostering compact 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 identified community lands are at an opportune location in proximity to the town centre of a scale required to provide for a mixed community use, inclusive of a sports and leisure complex. The subject lands represent the only undeveloped lands in proximity to the town centre suitable for the nature and scale of this use, further development of this nature could only be considered on the edge of the plan, physically removed from the town centre.

3. The nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.
Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per the Guidelines and owing to the extensive Flood Zones A and B dissecting the site, highly vulnerable and vulnerable development shall only be facilitated within lands outside of the identified flood zones. Only proposals for 'Water-compatible development' will be considered within lands identified as within Flood Zones A and B. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of SuDS in accordance with Donegal County Council SuDS Guidance policy.

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

Recommendation:

The proposed zoning of this site **Passes** the justification test for the reasons set put above.

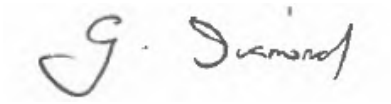


_____ DATE: 17/09/25

Alana Green

Executive Planner

Forward Planning Team



_____ DATE: 17/09/25

Graham Diamond

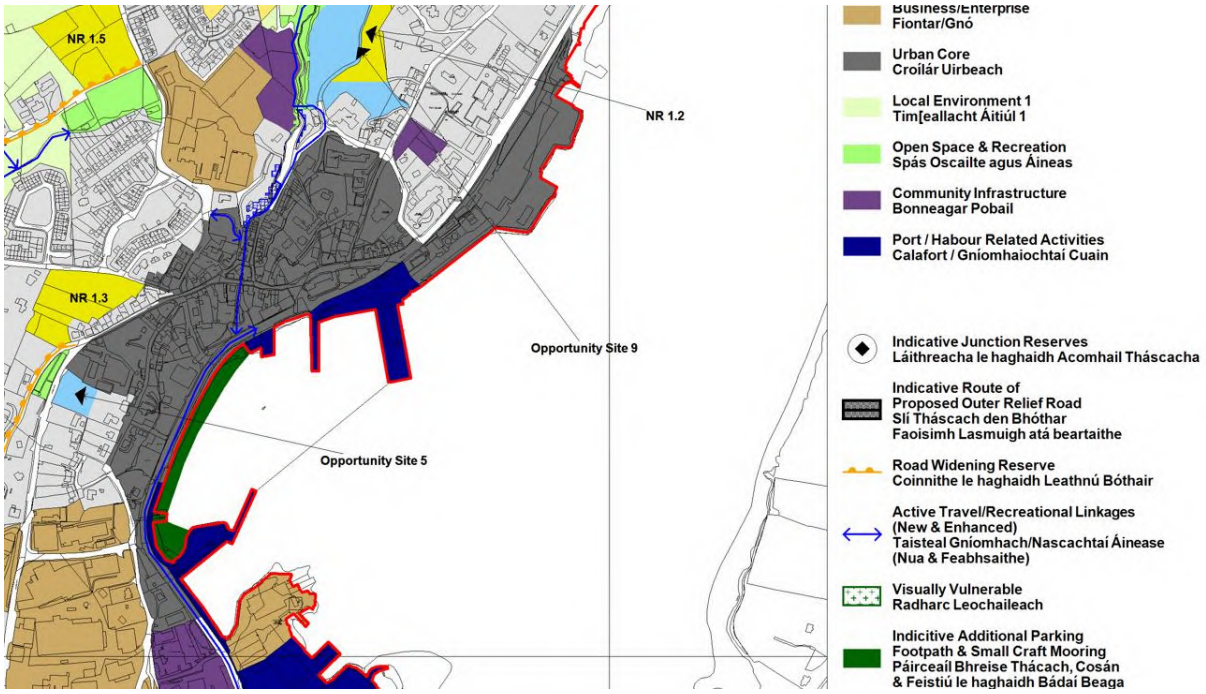
Senior Executive Planner

Appendix B.5

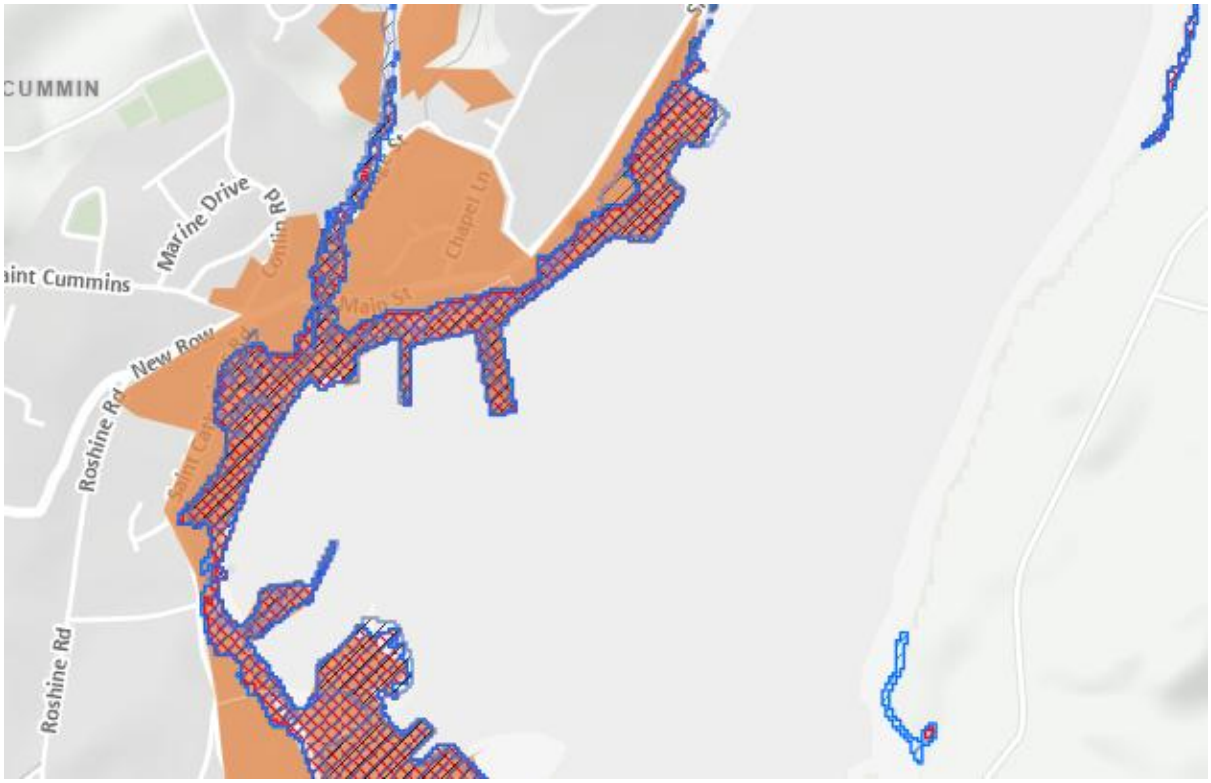
Donegal County Council Justification Tests

Killybegs

Justification Test for Development within the Urban Core/Town Centre Zoning in Killybegs located within Flood Risk Areas (which includes Opportunity Site Nos.1, 2, 3, 4, & 10).



Excerpt of Map 26.1 showing proposed "Urban Core" (grey) designation within Killybegs



Excerpt from High End Future Scenarios Flood Maps showing that lands zoned as "Urban Core" are within Flood Zones A & B

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

   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. The Development Plan's Core Strategy identifies a housing target of 151 units for the town.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   - i) **Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**
     The subject lands at risk from flooding are an integral part the historic town centre of Killybegs and include historic areas around Bridge Street and part of the Killybegs Town Archaeological Complex. Killybegs Town Centre has suffered from a degree of vacancy and dereliction (including in particular around Bridge Street) and population decline. Accordingly, the facilitation of "less vulnerable" commercial development at this location in Killybegs Town Centre is required to regenerate and revitalise the town centre including town centre retail and service opportunities at a sustainable location which fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.
   - ii) **Comprises significant previously developed and/or under-utilised lands:**
     The subject lands comprise part of the historic town centre of Killybegs including existing residential and commercial buildings along Bridge Street, and its associated back lands.
   - iii) **Is within or adjoining the core of an established or designated urban settlement:**
     The subject lands are located within the historic core of Killybegs Town Centre.
   - iv) **Will be essential in achieving compact and sustainable urban growth:**
     As the subject lands are located within existing built-up footprint of Killybegs Town Centre, consist predominately of existing residential and commercial buildings and associated backlands and are otherwise within easy walking distances of local schools and retail services. Accordingly, the facilitation of additional development at this location is essential to achieving and maintaining 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 subject lands comprise of an existing developed area within the historic town Centre of Killybegs. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "highly vulnerable" or "less

vulnerable" development can be permitted at these locations the proposal shall need to be subjected to a site-specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full. Donegal County Council will continue to engage with the OPW with a view to implementing appropriate flood relief measures to alleviate flooding of the Drumbeagh River across Shore Road and higher upstream at Bridge Street.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
   • FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
   • FRAs should consider the hydromorphological impacts on riparian corridors.
   • FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
   • Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

   Test Result
   It is considered that the "Urban Core" designation passes the justification test.

Specific Justification Tests for Opportunity Sites within the Killybegs Urban Core Designation:

Opportunity Site 1



1. **The overall urban settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**

   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. This Opportunity Site consists of an old but active and working pier in the centre of the town, is within the Urban Core of the town of Killybegs, and offers strong potential for regeneration of the town centre, particularly because of its centrality at a focal point in the town directly between the newly regenerated Diamond and the harbour.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:

   The subject land at risk from flooding, Opportunity Site 1, is an integral part the historic town centre of Killybegs. The site is occupied by what is known as "The Old Pier" which has the old fish auction hall sited thereupon. Killybegs Town Centre has suffered from a degree of vacancy and dereliction and population decline. Accordingly, the facilitation of commercial and public development at this location in Killybegs Town Centre that would be compatible with The Killybegs Regeneration Strategy and Action Plan is

required to regenerate and revitalise the town centre including providing town centre visitor services to the public at a sustainable location which fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.

ii) **Comprises significant previously developed and/or under-utilised lands:**
The subject lands comprise part of the historic town centre of Killybegs including the existing Auction Hall, the potential of which is considered to be currently under-utilised.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are located within the historic core of Killybegs Town Centre.

iv) **Will be essential in achieving compact and sustainable urban growth:**
As the subject lands are located within existing built-up footprint of Killybegs Town Centre and are within easy walking distances of the Town Centre and retail services, the facilitation of additional development at this location is essential to achieving and maintaining compact and sustainable urban growth and contributing to the urban fabric of the town centre.

v) **There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement:**
The subject lands comprise of an existing developed area within the historic town Centre of Killybegs. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "highly vulnerable" or "less vulnerable" development can be permitted at these locations the proposal shall need to be subjected to a site-specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.

• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result

It is considered that the “Opportunity Site 1” designation passes the justification test.

Opportunity Site 2



1. **The overall urban settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**

   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. This Opportunity Site consists of an active fish factory that is contiguous to the newly regenerated Town Diamond in the centre of the town, is within the Urban Core of the town of Killybegs and offers strong potential for regeneration of the town centre, particularly because of its centrality at a focal point in the town directly beside the newly regenerated Town Diamond and proximity to the harbour.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:

   The subject land at risk from flooding, Opportunity Site 2, is an integral part the historic town centre of Killybegs. The site is occupied by what is currently the premises of Gallagher Fish Merchants. Killybegs Town Centre has suffered from a degree of vacancy and dereliction and population decline. Accordingly, the facilitation of "less vulnerable" (as defined in The Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014)) commercial development at this location in Killybegs Town Centre (that would be compatible with The Killybegs Regeneration Strategy and Action Plan) is required to regenerate and revitalise the town centre at a sustainable location. Thus the designation of the site for "less vulnerable" and/or "water compatible" development fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.

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

The subject lands comprise part of the historic town centre of Killybegs, the potential of which is considered to be currently under-utilised.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are located within the historic core of Killybegs Town Centre.

iv) **Will be essential in achieving compact and sustainable urban growth:**
As the subject lands are located within existing built-up footprint of Killybegs Town Centre and are in the Town Centre, the facilitation of additional development at this location is essential to achieving and maintaining compact and sustainable urban growth and contributing to the urban fabric of the town centre.

v) **There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement:**
The subject lands comprise of an existing developed area within the historic town Centre of Killybegs. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "less vulnerable" development can be permitted at this location the proposal shall need to be subjected to a site specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full. Furthermore, Donegal County Council will seek to engage with the OPW with a view to implementing flood relief measures to alleviate flooding of the Drumbeagh River across Shore Road at abnormally high tides.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and

the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result

It is considered that the “Opportunity Site 2” designation passes the justification test.

Opportunity Site 3



1. **The overall urban settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**

   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. This Opportunity Site consists of an old solid fuels sales and repository yard that is in the centre of the town, is within the Urban Core of the town of Killybegs, and offers strong potential for regeneration of the town centre, particularly because of its centrality in the town in close proximity to the newly regenerated Town Diamond, the town's waterfront (the site is bounded by Shore Road and Quay Street) and also to the harbour and marina.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:

   The subject land at risk from flooding, Opportunity Site 3, is an integral part the historic town centre of Killybegs. The site is occupied by what is referred to locally as "the Old Coal Yard". Killybegs Town Centre has suffered from a degree of vacancy and dereliction and population decline. Accordingly, the facilitation of "less vulnerable" (as defined in The Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014)) commercial development within the Flood Zones at this location in Killybegs Town Centre (that would be compatible with The Killybegs Regeneration Strategy and Action Plan) is required to regenerate and revitalise the town centre at a sustainable location. Thus the designation of the site for "less vulnerable" and/or "water compatible" development fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.

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

   The subject lands comprise part of the historic town centre of Killybegs, the potential of which is considered to be currently under-utilised.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are located within the historic core of Killybegs Town Centre.

iv) **Will be essential in achieving compact and sustainable urban growth:**
As the subject lands are located within existing built-up footprint of Killybegs Town Centre and are in the Town Centre, the facilitation of additional development at this location is essential to achieving and maintaining compact and sustainable urban growth and contributing to the urban fabric of the town centre.

v) **There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement:**
The subject lands comprise of an existing developed area within the historic town Centre of Killybegs. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "less vulnerable" development can be permitted at this location the proposal shall need to be subjected to a site specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full. Furthermore, Donegal County Council will seek to engage with the OPW with a view to implementing flood relief measures to alleviate flooding of the Drumbeagh River across Shore Road at abnormally high tides.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result

It is considered that the “Opportunity Site 3” designation passes the justification test.

Opportunity Site 4



1. **The overall urban settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**

   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. This Opportunity Site consists of the tarmacadamed car park/yard between the Killybegs Fishermen's Organisation Building/Offices and Shore Road, is within the Urban Core of the town of Killybegs, and offers strong potential for regeneration of the town centre, particularly because of its centrality in close proximity to other retail and service business premises, the town's waterfront (the site is fronted by Shore Road) and also to the harbour and marina.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:

   The subject land at risk from flooding, Opportunity Site 4, is occupied by the Killybegs Fishermen's Organisation. Killybegs Town Centre has suffered from a degree of vacancy and dereliction and population decline. Accordingly, the facilitation of "less vulnerable" (as defined in The Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014)) commercial development within the Flood Zones at this location in Killybegs Town Centre is required to regenerate and revitalise the town centre at a sustainable location. Thus the designation of the site for "less vulnerable" and/or "water compatible" development fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.

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

   The subject lands comprise part of the urban core of Killybegs, the potential of which is considered to be currently under-utilised.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are located within the urban core of Killybegs Town.

iv) **Will be essential in achieving compact and sustainable urban growth:**
As the subject lands are located within existing built-up footprint of Killybegs Town Centre, the facilitation of additional development at this location is essential to achieving and maintaining compact and sustainable urban growth and contributing to the urban fabric of the town centre.

v) **There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement:**
The subject lands comprise of an existing developed area within the urban core of Killybegs. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "less vulnerable" development can be permitted at this location the proposal shall need to be subjected to a site specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result
It is considered that the "Opportunity Site 4" designation passes the justification test.

Opportunity Site 8



1. **The overall urban settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**

   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. This Opportunity Site consists of a fenced and hardcored yard beside the designated Killybegs Harbour and it is owned by the Killybegs Harbour Authority. It is also adjacent to the Atlantic Technical University Killybegs Campus, is proximal to the Urban Core of the town of Killybegs, and offers strong potential for a collaborative project between the ATU and the Department of Agriculture, Food and Marine. Given that it is owned by the Harbour Authority the policy in relation to this Opportunity Site is as follows:

"KB-O-P-8: Consider proposals for port-related activities on **Opportunity Site 8.** Proposals for residential or retail development on this site shall not be favourably considered. All proposals for development on this Opportunity Site must respect the amenity and setting of Saint Catherine's Well and Complex and access to same, and also must address any/all flood risk issues at this location. "Highly vulnerable" development shall not be permissible within the part of the site covered by flood zones A or B. Where "less vulnerable" development is proposed within a flood zone it shall be subjected to a strategic flood risk assessment to an appropriate level of detail."

As some ancillary uses that would be associated with port-related activities" could possibly be deemed to be "less vulnerable" development a justification test is carried out for this site.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**
   - **i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:**

The subject land at risk from flooding, a peripheral portion of Opportunity Site 8, is currently unoccupied. Killybegs Town has suffered from a degree of vacancy and dereliction and population decline. Accordingly, the facilitation of "less vulnerable" (as defined in The Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014)) commercial development or development ancillary to port-related activities but not directly dependant on a waterside location within the Flood Zones at the periphery of this site is required to regenerate and revitalise the town at a sustainable location. To permit the uses prescribed above would be consistent with the development and expansion of the established harbour and has strong potential to generate further industry and employment in the town. Thus the designation of the site prone to inundation by flood zones for "less vulnerable" and/or "water compatible" development fully accords with the Government Policy for the development of marine related industry in Killybegs.

ii) **Comprises significant previously developed and/or under-utilised lands:**
The subject lands are contiguous to Killybegs Harbour, are in close proximity to the ATU Killybegs Campus, and the potential of this site is considered to be currently under-utilised.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are located within close proximity to the urban core of Killybegs Town.

iv) **Will be essential in achieving compact and sustainable urban growth:**
As the subject lands are located within existing built-up footprint of Killybegs Town, the facilitation of additional port-related development and ancillary development at this location is essential to achieving and maintaining compact and sustainable urban growth and contributing to the town as a premier fishing port.

v) **There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement:**
The subject lands comprise of an existing developed area (levelled, hardcored and fenced) within close proximity the urban core of Killybegs and contiguous to the designated harbour. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "less vulnerable" development can be permitted at this location the proposal shall need to be subjected to a site specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full. Of note is that the majority of this site is not subject to inundation by flood zones.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that

they would not have adverse flood risk impacts. The site specific FRA should consider the following:

• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.

• FRAs should consider the hydromorphological impacts on riparian corridors.

• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.

• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result

It is considered that the “Opportunity Site 8” designation passes the justification test.

Opportunity Site 10



1. **The overall urban settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**

   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. This Opportunity Site consists of a redundant ice plant in the centre of the town, is within the Urban Core of the town of Killybegs and offers strong potential for regeneration of the town centre, particularly because of its centrality in the town in close proximity to the newly regenerated Diamond and the harbour.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

   i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:

   The subject land at risk from flooding, Opportunity Site 10, is an integral part the historic town centre of Killybegs. The site is occupied by what is known as "The Ice Plant" which has the old ice manufacturing plant/factory which was used for packing fish sited thereupon. Killybegs Town Centre has suffered from a degree of vacancy and dereliction and population decline. Accordingly, the facilitation of commercial and public development at this location in Killybegs Town Centre would be compatible with The Killybegs Regeneration Strategy and Action Plan, is required to regenerate and revitalise the town centre including providing town centre visitor services to the public at a sustainable location, and fully accords with the Government's Town Centre First Policy and the National Strategic Outcome of Sustainable Mobility set out the National Planning Framework.

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

   The subject lands comprise part of the historic town centre of Killybegs, the site is currently redundant, and thus the potential of this site is considered to be currently under-utilised.

iii) **Is within or adjoining the core of an established or designated urban settlement:**
The subject lands are located within the historic core of Killybegs Town Centre.

iv) **Will be essential in achieving compact and sustainable urban growth:**
As the subject lands are located within existing built-up footprint of Killybegs Town Centre and are within easy walking distances of the Town Centre and retail services, the facilitation of additional development at this location is essential to achieving and maintaining compact and sustainable urban growth and contributing to the urban fabric of the town centre.

v) **There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement:**
The subject lands comprise of an existing developed area within the historic town Centre of Killybegs. Accordingly, it is considered that Section 4.27a of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any "highly vulnerable" or "less vulnerable" development can be permitted at these locations the proposal shall need to be subjected to a site specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
• FRAs should consider the hydromorphological impacts on riparian corridors.
• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

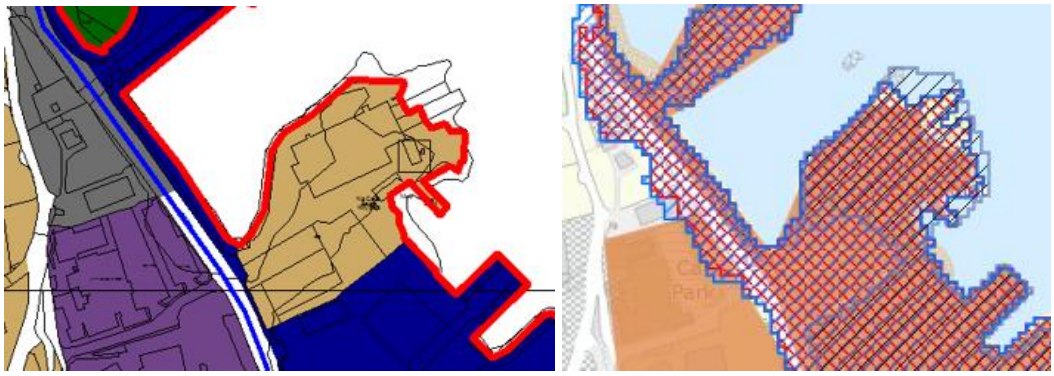
Test Result
It is considered that the "Opportunity Site 10" designation passes the justification test.

Justification Test for Development within the "Business/Enterprise" Zoning in Killybegs located within Flood Risk Areas and currently occupied by "Mooney Boats".

The site in question is located between the Shore Road and the designated Killybegs Harbour. It is currently occupied by Mooney Boats which retails chandlery and is also a boat building and repair yard.



Google Street View (image capture September 2021) showing the retail premises and Boatyard of Mooney Boats on lands zoned for "Economic Development" and adjoining lands zoned as "Port/Harbour Related Activities"



Excerpt from Map 26.1 showing lands zoned as "Business/Enterprise" within Flood Zones A & B (High-End Future scenarios)

While the boat building and repair side of Mooney Boats is generally a water compatible development, the retail side of the enterprise on site only constitutes a "less vulnerable development" and as these lands fall within Flood Zone A, a justification test is required here.

1. **The settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**
   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for this allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions.

There is an established commercial premises at this particular site, most of which is "water compatible development", but an element of which is "less vulnerable development".

2. **The zoning or designation of the lands for the particular use or development type is required to achieve, and consistent with, the proper planning and sustainable development of the settlement and, in particular:**

   i) Is essential to sustain existing employment and continued economic development of the overall urban settlement:

   The subject lands at risk from flooding are an integral part the historic harbour and waterfront area of Killybegs and are already occupied by "water compatible development" and to a lesser degree "less vulnerable (retail) development" that is fundamentally ancillary to the "water compatible development". Killybegs Town has suffered from a degree of unemployment and population decline. Accordingly, the continued facilitation of commercial development at this location beside Killybegs Town Centre and the designated harbour is required to sustain regeneration and revitalisation of the town centre including providing continued retail and service opportunities at a sustainable location.

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

   The subject lands comprise part of waterfront and harbour area of Killybegs including existing commercial buildings and a boat yard.

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

   The subject lands are located in very close proximity to the Urban Core of Killybegs Town Centre.

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

   The subject lands are located within existing built-up footprint of Killybegs Waterfront and Harbour Area, consist predominately of existing commercial and are otherwise within easy walking distances of other commercial services. Accordingly, the facilitation of additional development at this location is essential to sustaining already established development and thus achieving and maintaining 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 in closer proximity to the core of the urban settlement:

   The subject lands comprise of an existing developed area within the waterfront and harbour area of Killybegs. Accordingly, it is considered that Section 4.27 of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any vulnerable development can be permitted at this location the proposal shall need to be subjected to a site-specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential

approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:

• FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.

• FRAs should consider the hydromorphological impacts on riparian corridors.

• FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.

• Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result

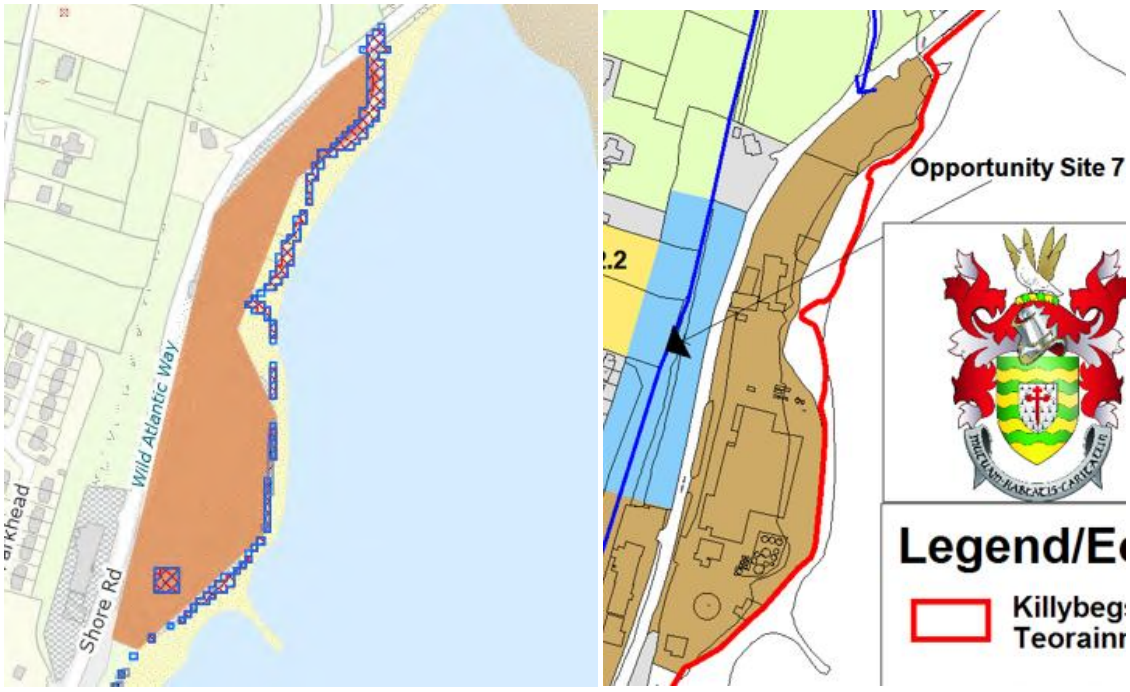
It is considered that this “Business/Enterprise” designation passes the justification test.

Justification Test for Development within the "Business/Enterprise" Zoning in Killybegs located within Flood Risk Areas and currently occupied by "United Fish Industries".

The site in question is located between the R263 northern end of the Shore Road and the seashore. It is currently occupied by United Fish Industries which company produces fishmeal and fish oil.



Google Street View (image capture September 2021) showing the fishmeal and fish oil factory known as "United Fish Industries" on lands zoned for "Economic Development" and adjoining the sea shore



Excerpt from Map 26.1 showing lands zoned as "Business/Enterprise" within Flood Zones A & B (High-End Future scenarios)

1. **The settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**
   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within Section 3.3.2 of the County Donegal Development Plan 2024-2030. The rationale for

this allocation is due to the existence of a long-established fish processing factory at this zoning designation that is functionally dependant on proximity to the sea and the fact that Killybegs is the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. The town is recognised as having considerable potential as a base for tourism while also providing important local retail, service and employment functions. There is an established industrial premises at this particular site consisting of dockside fish processing and refrigeration and compatible activities requiring a waterside location"; all of which are "water compatible development".

2. **The zoning or designation of the lands for the particular use or development type is required to achieve, and consistent with, the proper planning and sustainable development of the settlement and, in particular:**
   - i) **Is essential to sustain existing employment and continued economic development of the overall urban settlement:**
     The subject lands at risk from peripheral tidal flooding are an integral part of the waterfront area of Killybegs and are already occupied by "water compatible development". Killybegs Town has suffered from a degree of unemployment and population decline. Accordingly, the continued facilitation of appropriate commercial development at this location in reasonable proximity (given its non-retail function and scale of operation) to Killybegs Town Centre and the designated harbour is required to sustain regeneration and revitalisation of the town centre including providing continued water compatible service opportunities at a sustainable location.
   - ii) **Comprises significant previously developed and/or under-utilised lands:**
     The subject lands comprise part of the waterfront area of Killybegs including existing fish processing plant and buildings.
   - iii) **Is within or adjoining the core of an established or designated urban settlement:**
     The subject lands are located in reasonably close proximity (given the scale of industrial use entailed) to the Urban Core of Killybegs Town Centre.
   - iv) **Will be essential in achieving compact and sustainable urban growth:**
     As the subject lands are located within the existing built-up footprint of Killybegs Waterfront Area, consist entirely of existing industrial fish processing and are otherwise within easy walking distances of other commercial services, the facilitation of additional development ancillary to the existing fish processing industrial use at this location is essential to sustaining already established development and thus achieving and maintaining 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 in closer proximity to the core of the urban settlement:**
     The subject lands comprise of an existing developed area within the waterfront area of Killybegs. Accordingly, it is considered that Section 4.27 of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any vulnerable development can be permitted at this location the proposal shall need to be subjected to a site-specific strategic flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
   • FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
   • FRAs should consider the hydromorphological impacts on riparian corridors.
   • FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
   • Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result

It is considered that this “Business/Enterprise” designation passes the justification test.

Justification Test for Development within the "Community Infrastructure" Zoning in Killybegs located within Flood Risk Areas and currently occupied by "Atlantic Technological University (Killybegs Campus)" (hereinafter referred to as "ATU").

The site in question fronts onto Shore Road and it is currently occupied by ATU. Only a peripheral part of the site beside Shore Road floods and it is developed as a car parking area (see Google Street View image below).



Google Street View (image capture September 2021) showing the entrance into the ATU Killbegs Campus and car parking contiguous to Shore Road.



Excerpt from Map 26.1 showing the eastern periphery of lands zoned as "Community Infrastructure" within Flood Zones A & B (High-End Future scenarios)

1. **The settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**
   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within the County Donegal Development Plan 2024-2030.

   Also within the County Donegal Development Plan 2024-2030 the Atlantic Technological University (ATU) campuses at Letterkenny and Killybegs are acknowledged as a key

economic drivers for the county and wider region, increasing the attractiveness of the county as a potential investment location by both providing a pool of educated and skilled prospective employees and building the research and innovation capabilities that strengthen the county's economic resilience and competitiveness. The contribution of the ATU to the economy and employment offering of the county and wider region is set to grow, amid continuing collaboration on a cross-border further and higher education cluster with Ulster University, North West Regional College and Donegal ETB (Education & Training Board), and in terms of its strategic partnerships and its growing research and development capabilities.

The rationale for the "County Growth Driver" allocation is due to Killybegs being the Primary fishing port in the State; the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally. ATU has an established 3rd level education facility sited at this particular site, but a surface car parking element of the overall campus is constructed within the periphery of the Flood Zones beside the Shore Road.
It is an objective of the County Donegal Development Plan 2024-2030 (ED-O-14 refers) "To facilitate and support the future development of the ATU campuses in Letterkenny and Killybegs, including their innovation, research and development functions."

2. **The zoning or designation of the lands for the particular use or development type is required to achieve, and consistent with, the proper planning and sustainable development of the settlement and, in particular:**
   - i) **Is essential to sustain existing employment, research and innovation, and continued economic development of the overall urban settlement:**
     The subject lands at risk from flooding are only peripherally within the Flood Zones. The campus is long established and only a portion of surface car parking close to the Shore Road (which constitutes "less vulnerable development") is at that peripheral area. Killybegs Town has suffered from a degree of unemployment and population decline. Accordingly, the continued facilitation of the ATU campus at this location beside Killybegs Town Centre and the designated harbour is required to sustain regeneration and revitalisation of the town centre including providing continued educational, research and innovation opportunities at a sustainable location.
   - ii) **Comprises significant previously developed and/or under-utilised lands:**
     The subject lands comprise part of waterfront area of Killybegs and is an established campus of the ATU.
   - iii) **Is within or adjoining the core of an established or designated urban settlement:**
     The subject lands are located in very close proximity to the Urban Core of Killybegs Town Centre.
   - iv) **Will be essential in achieving compact and sustainable urban growth:**
     As the subject lands are located within existing built-up footprint of Killybegs waterfront area, consist of an existing 3rd level educational facility/campus and are otherwise within easy walking distances of the town centre, the facilitation of additional development at this location is essential to sustaining already established development and thus achieving and maintaining 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 in closer proximity to the core of the urban settlement:**

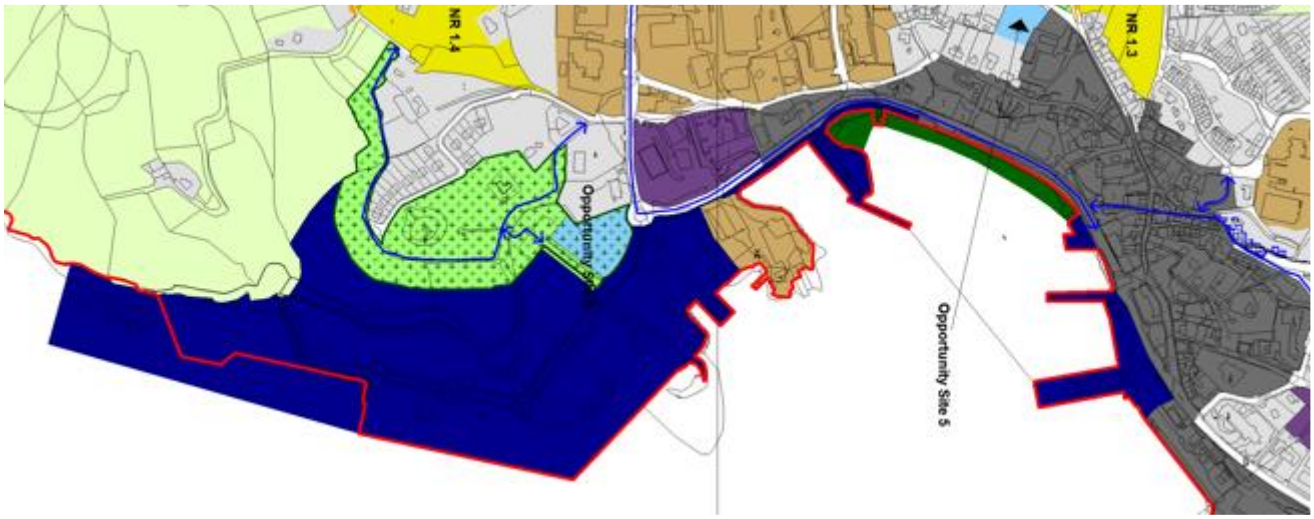
The subject lands comprise of an existing developed area within the waterfront area of Killybegs. Accordingly, it is considered that Section 4.27 of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any vulnerable development can be permitted at this location the proposal shall need to be subjected to a site-specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
   • FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
   • FRAs should consider the hydromorphological impacts on riparian corridors.
   • FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
   • Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

   Test Result
   It is considered that this “Community Infrastructure” designation passes the justification test.

Zoning of the Designated Killybegs Harbour and Other Sites for "Port/Harbour Related Activities" (dark blue) within High End Future Scenario Flood Zones

The development of docks, marinas and wharves; navigation facilities; ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location is what is, for the greater part, envisaged within the harbour area to be zoned "Port/Harbour Related Activity", these are all water compatible development, and thus no justification test is necessary for this aspect of the proposed zoning. However, as it is possible that some industrial development or development ancillary to port-related activities (yet not entirely dependant on the waterside location in their own right) could be permissible here, it is deemed that a justification test is necessary here.



1. **The settlement of Killybegs is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy, and the County Donegal Development Plan 2024-2030.**
   Killybegs is Ireland's premier fishing port. The town is identified as a County Growth Driver within the County Donegal Development Plan 2024-2030. The rationale for the "County Growth Driver" allocation is due to Killybegs being the Primary fishing port in the State, the town will have a key role to play in the offshore renewable energy sector and marine resource innovation generally.

   Killybegs is Ireland's premier fishing port with €121m worth of landings recorded in 2021. In terms of marine activity, the port of Na Cealla Beaga (Killybegs) is designated as one of the country's six fishery harbour centres and the town is a base for a wide range of marine services, from maritime logistics and engineering to value added processing and leisure tourism. The recently formed Killybegs Marine Cluster strives to provide a hub for world class marine engineering servicing over a range of sectors to both a domestic and an international market. The Regional Spatial and Economic Strategy for the Northern and Western Region 2020-2032 focuses on Na Cealla Beaga in its policy objectives including commitment to protecting, upgrading and expanding Killybegs. This Town Plan, as part of Proposed Variation No.1, aims to support appropriate proposals that can enhance the marine services and employment base within the town, thereby consolidating Na Cealla Beaga (Killybeg's) role as one of the premier ports in the country.

The Department of Agriculture, Food and the Marine owns and directly manages Killybegs Fishery Harbour Centre. It is managed and operated in accordance with the provisions of the Fishery Harbour Centres Act 1968, which requires the Minister to manage, control, operate and develop the Harbour. It also places specific responsibility on the Minister in relation to maintenance, repair, improvement, extension and modification of the harbours including buildings and road access. Any future expansion of the existing deep-water pier is likely to take place in a southerly direction and this plan supports the delivery of this strategic marine infrastructure. Any proposals relating to the harbour area must demonstrate consistency with the National Marine Planning Framework including the environmental, economic, social and sectoral objectives and policies detailed therein, as per Policy MRCM-P-1 (Chapter 14) of the County Donegal Development Plan 2024-2030.

2. **The zoning or designation of the lands for the particular use or development type is required to achieve, and consistent with, the proper planning and sustainable development of the settlement and, in particular:**

   i) **Is essential to sustain existing employment, research and innovation, and continued economic development of the overall urban settlement:**
   The subject lands at risk from flooding are for the greater part the long-established designated Killybegs Harbour. Killybegs Town has suffered from a degree of unemployment and population decline. Accordingly, the continued facilitation of the development and expansion of the designated harbour at this location in close proximity to Killybegs Town Centre is required to sustain trade, enterprise and employment at a sustainable location. This zoning is also necessary to facilitate the diversification and expansion of marine related enterprises that exist in Killybegs.

   ii) **Comprises significant previously developed and/or under-utilised lands:**
   The subject lands comprise in part, the designated harbour, and in others, the immediate waterfront or the sea (where it is intended to extend the harbour).

   iii) **Is within or adjoining the core of an established or designated urban settlement:**
   The subject lands are located in very close proximity to the Urban Core of Killybegs Town Centre.

   iv) **Will be essential in achieving compact and sustainable urban growth:**
   As the subject lands are located within existing built-up footprint of Killybegs harbour area, consist for the greater part of an existing designated harbour, and are otherwise within easy walking distances of the town centre, the facilitation of additional development at this location is essential to sustaining already established development and thus achieving and maintaining 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 in closer proximity to the core of the urban settlement:**
   The subject lands comprise of an existing developed area within the waterfront and designated harbour areas of Killybegs. Accordingly, it is considered that Section 4.27 of the Flood Risk Management Guidelines applies to the subject lands and this criterion can therefore be set aside in accordance with the related Footnote 4 of Box 4.: Justification Test for Development Plans (Circular PL 2/2014 refers). Before any vulnerable development can be permitted at this location the proposal shall need to be subjected to a site-specific flood risk assessment to an appropriate level of detail and developers shall be obligated to implement all mitigation measures (structural and/or non-structural) arising from such an assessment in full.

3. Sources consulted indicate that a portion of the settlement/zoning is within Flood Zone A/B. However, the use of the subject lands for development that is potentially vulnerable to flooding has been justified in accordance with the requirements of the Development Plan justification test, as required by the Planning System and Flood Risk Management Guidelines. Therefore, development remains appropriate in line with the sequential approach described in the Guidelines and the criteria set out in Circular PL 2/2014. All new developments shall be subject to a Site-Specific Flood Risk as per The Guidelines. A FRA of appropriate detail should accompany applications for development to demonstrate that they would not have adverse flood risk impacts. The site specific FRA should consider the following:
   • FRAs should address surface water management for development, demonstrating consideration of County Donegal Development Plan flooding policies and incorporation of SuDS in accordance with Donegal County Council SuDS Guidance policy.
   • FRAs should consider the hydromorphological impacts on riparian corridors.
   • FRAs should examine residual risk associated with culvert blockages, defence failure and climate change (High End Future Scenario) to set finished flood levels where appropriate. The FRAs should ensure development does not block flow paths, does not increase flood risk elsewhere, is designed to appropriate standard of flood resilient construction and demonstrates emergency evacuation procedures during flood events.
   • Additional development such as extensions or changes of use can generally be considered appropriate, but an appropriately detailed flood risk assessment will be required in support of any planning application. The level of detail will vary depending on the risks identified and the proposed land use. The FRA should be aimed at setting finished floor levels and demonstrating no increase in flood risk elsewhere

Test Result

It is considered that these "Port/Harbour Related Activities" designations pass the justification test.

Community Infrastructure Zoning East of the Killybegs Seafoods Factory and southeast of Emerald Drive Housing Estate

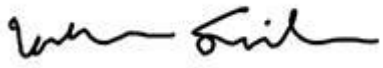
The zoning of this site has been altered to ensure no encroachment by Flood Zone A or Flood Zone B. Peripheral parts of this designation which originally would have experienced inundation have been redesignated “Recreation and Amenity”.

All Established Development 1 Zonings that were Overlapped by Flood Zones

Any such intersections have been amended to “Established Development 2”.

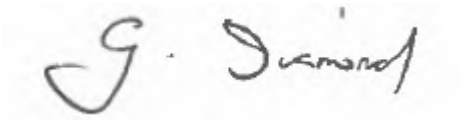
All Local Environment 1 Zonings that were Overlapped by Flood Zones

Any such intersections have been amended to “Local Environment 2”.



_____**DATE: 08/09/2025**

Killian Smith
Executive Planner
Forward Planning Team
ENDORSED BY:



_____ **DATE: 08/09/2025**

Graham Diamond
Senior Executive Planner
Forward Planning Team

Appendix C

Donegal County Council

Additional Flood Information Maps

646000
648000
946000
944000
N
R238
R244
R240
Station Road
Convent Road
Carndonagh
0
0.25
0.5 km

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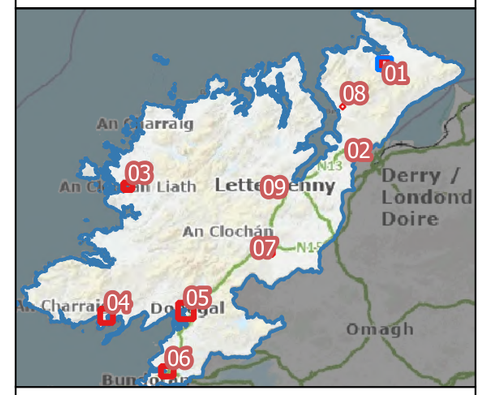
MAP SERIES	01 OF 09

KEY PLAN



LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudary
- Watercourses
- DCC Flood Risk Information

REV:	NOTE:	DATE:
01	FOR INFORMATION	03/10/2025

Comhairle Contae Dhún na nGall
Donegal County Council

McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

MAP:	FLOOD INFORMATION AREA	
FLOOD PROBABILITY:	N/A	
SOURCE CRS:		ITM EPSG:2157
DRAWN BY:	AS	DATE: 03/10/2025
CHECKED BY:	ML	DATE: 03/10/2025
APPROVED BY:	DKS	DATE: 03/10/2025
DRAWING NUMBER:	M02249-01_FL201	
DRAWING SCALE:	AS SHOWN @ A3	

640000

922000

922000

N

Bridge End

640000

0 0.25 0.5 km

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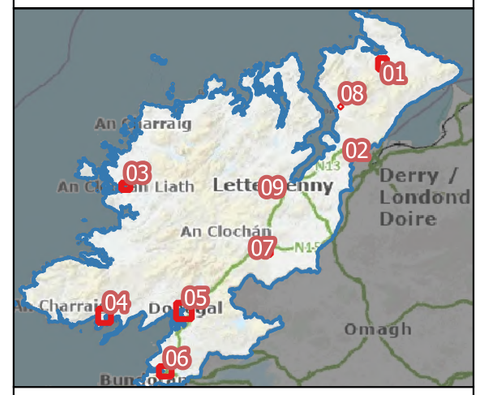
MAP SERIES	02 OF 09

KEY PLAN



LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudary
- Watercourses
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REV:	NOTE:	DATE:
01	FOR INFORMATION	03/10/2025

Comhairle Contae Dhún na nGall
Donegal County Council

McCloy Consulting
Unit 12, The Beat Centre, Stephenstown Industrial Estate, Balbriggan, Co. Dublin
T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

MAP:	FLOOD INFORMATION AREA	
FLOOD PROBABILITY:	N/A	
SOURCE CRS:		ITM EPSG:2157
DRAWN BY:	AS	DATE: 03/10/2025
CHECKED BY:	ML	DATE: 03/10/2025
APPROVED BY:	DKS	DATE: 03/10/2025
DRAWING NUMBER:	M02249-01_FL202	
DRAWING SCALE:	AS SHOWN @ A3	

576000

578000

912000

N

Dunglow Lough

Dunglow Lough

Dunglow

Dunglow Lough

0 0.25 0.5 km

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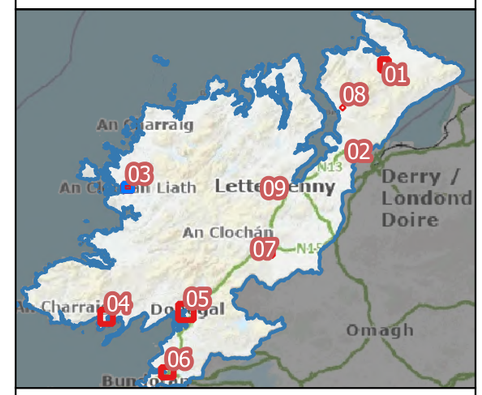
MAP SERIES	03 OF 09

KEY PLAN



LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudary
- Watercourses
- DCC Flood Risk Information

REV:	NOTE:	DATE:
01	FOR INFORMATION	03/10/2025

Comhairle Contae Dhún na nGall
Donegal County Council

McCloy Consulting

Unit 12, The Beat Centre,
Stephenstown Industrial Estate,
Balbriggan, Co. Dublin

T: +353 (0)1 5138963
E: info@mccloyconsulting.ie
W: www.mccloyconsulting.ie

MAP:	FLOOD INFORMATION AREA	
FLOOD PROBABILITY:	N/A	
SOURCE CRS:		ITM EPSG:2157
DRAWN BY:	AS	DATE: 03/10/2025
CHECKED BY:	ML	DATE: 03/10/2025
APPROVED BY:	DKS	DATE: 03/10/2025
DRAWING NUMBER:	M02249-01_FL203	
DRAWING SCALE:		AS SHOWN @ A3

570000

572000

878000

876000

N

R263

Main Street

Shore Road

Fintragh Road

Killybegs

0 0.25 0.5 km

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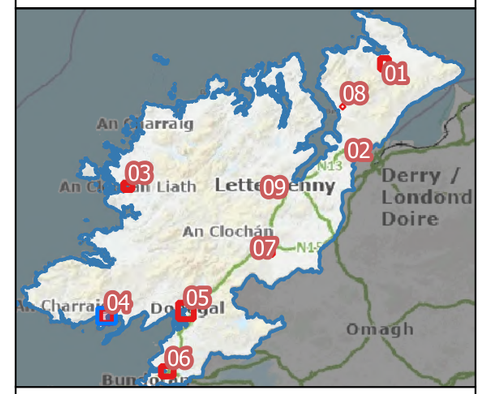
MAP SERIES	04 OF 09

KEY PLAN



LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudary
- Watercourses
- DCC Flood Risk Information

REV:	NOTE:	DATE:
01	FOR INFORMATION	03/10/2025

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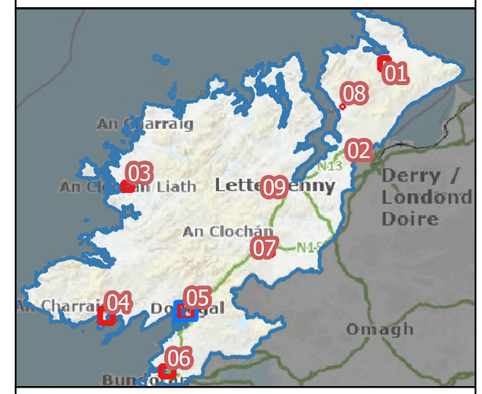
DRAWING NUMBER:	M02249-01_FL204	
DRAWING SCALE:		AS SHOWN @ A3

590000
592000
594000
880000
878000
876000
N
N56
N15
R267
Donegal
Ballybofey Road
The Glebe
0 0.25 0.5 km



LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudary
- Watercourses
- DCC Flood Risk Information

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MAP SERIES	05 OF 09
KEY PLAN	

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DRAWING NUMBER:	M02249-01_FL205	
DRAWING SCALE:		AS SHOWN @ A3

586000

588000

862000

860000

N

R231

N15

Slate Row

R267

Bachelor's Walk

Main Street

Ballyshannon

Assaroe Road

Allingham Road

R936

N3

West Port

Assaroe Lake

0 0.25 0.5 km

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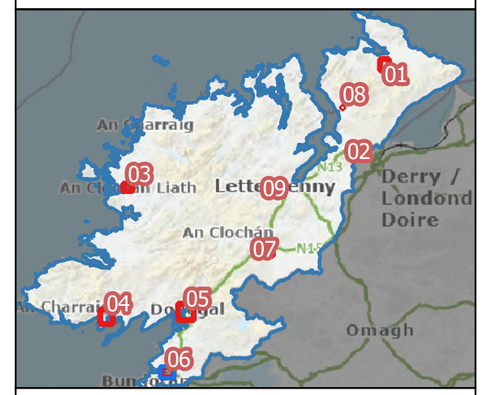
MAP SERIES	06 OF 09

KEY PLAN



LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudary
- Watercourses
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APPROVED BY:	DKS	DATE: 03/10/2025
DRAWING NUMBER:	M02249-01_FL206	
DRAWING SCALE:	AS SHOWN @ A3	

612000
614000
616000
896000
894000
N
N13
N15
R252
Glenfin Street
Stranorlar
Ballybofey
0
0.25
0.5 km

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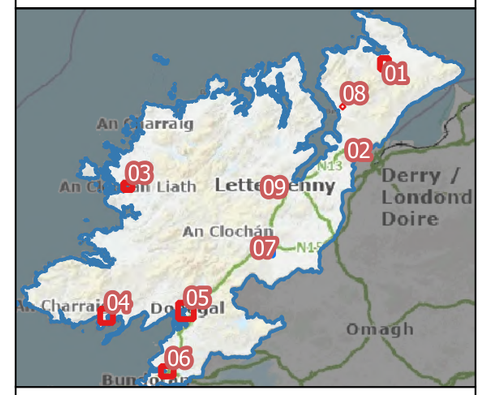
MAP SERIES	07 OF 09

KEY PLAN



LEGEND

- Donegal County Administrative Boundary
- Area Plan Boudary
- Watercourses
- DCC Flood Risk Information

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MAP:	FLOOD INFORMATION AREA	
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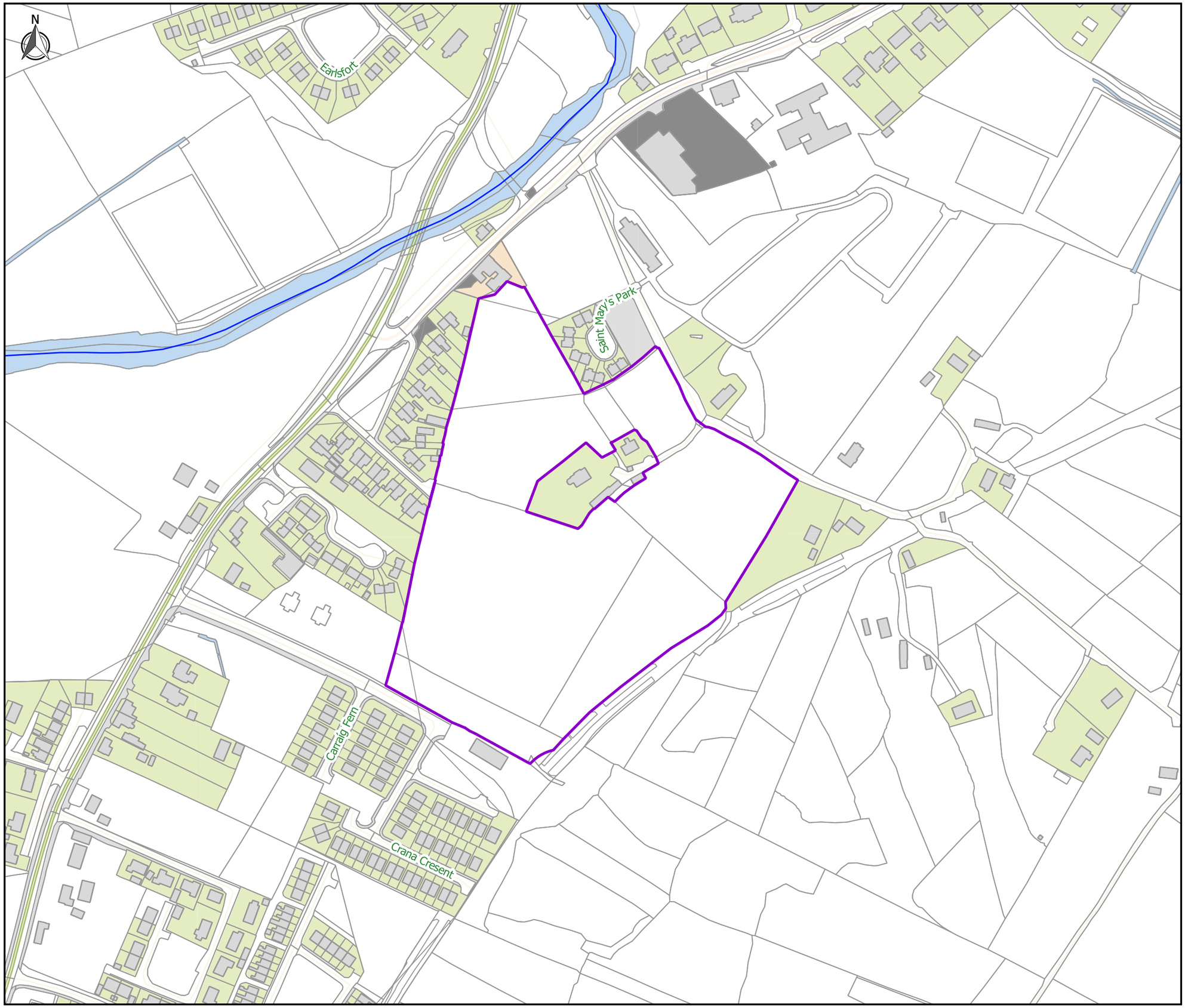
DRAWING SCALE:		AS SHOWN @ A3



0 0.25 0.5 km

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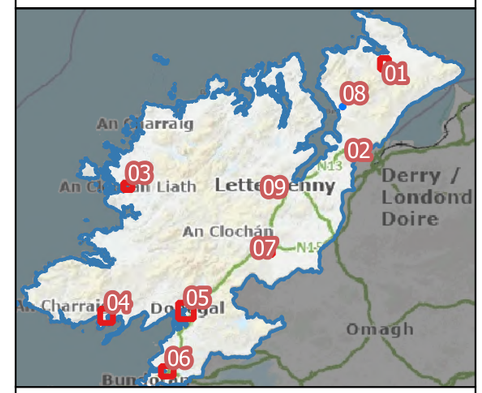
MAP SERIES	08 OF 09

KEY PLAN



LEGEND

- Donegal County Administrative Boundary
- Amendments
- Watercourses
- DCC Flood Risk Information

REV:	NOTE:	DATE:
01	FOR INFORMATION	03/10/2025

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MAP: FLOOD INFORMATION AREA

FLOOD PROBABILITY: N/A

SOURCE CRS:		ITM EPSG:2157
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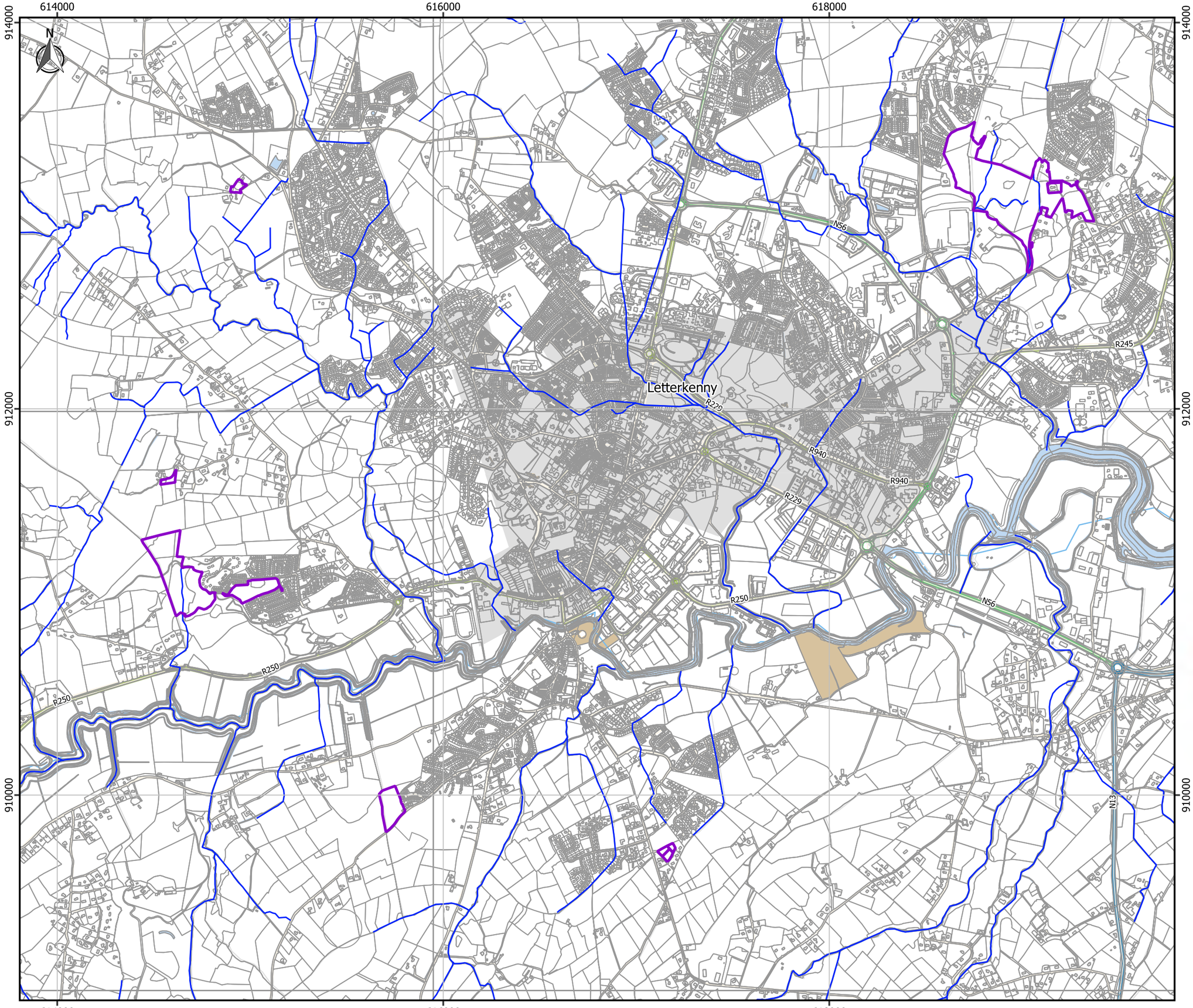
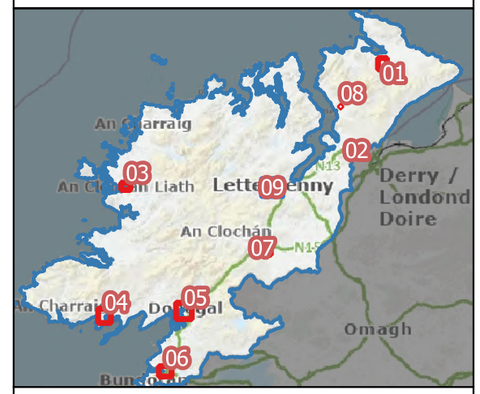
DRAWING SCALE: AS SHOWN @ A3





LEGEND

- Donegal County Administrative Boundary
- Amendments
- Watercourses
- DCC Flood Risk Information

MAP SERIES	09 OF 09

KEY PLAN

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DRAWING SCALE:	AS SHOWN @ A3	

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