

Strategic Flood Risk Assessment

For the

Proposed Amendment of the

Charlestown-Bellaghy Local Area Plan 2010-2016



Mayo County Council
Sligo County Council

April 2012

Section 1: Overview of the Guidelines

1.1 Introduction

Flooding is a natural process that can happen at any time in a wide variety of locations. Flooding from the sea and rivers is probably best known but prolonged, intense and localised rainfall can also cause sewer flooding, overland flow and ground water flooding. Flooding has significant impacts on human activities; it can threaten people's lives, their property and the environment. Assets at risk can include housing, transport and public service infrastructure, and commercial, industrial and agricultural enterprises. The health, social, economic and environmental impacts of flooding can cause significant and have a wide community impact.

The following documents have been used in the preparation of this assessment:

- The Planning System and Flood Risk Management, Guidelines for Planning Authorities, DoEHLG, 2009
- The Planning System and Flood Risk Management Guidelines for Planning Authorities; Technical Appendices; DoEHLG, 2009

The Planning System and Flood Risk Management Guidelines 2009 have been issued by the Minister of the Environment, Heritage and Local Government under Section 28 of the Planning and Development Act 2000, as amended. Planning Authorities and An Bord Pleanála are required to have regard to the Guidelines in carrying out their functions under the Planning Acts. They are also required to make the guidelines available for inspection by members of the public. These Guidelines supersede previous interim guidance on flooding in Appendix E to the Development Plan Guidelines in 2007.

1.2 Purpose of the Guidelines

The Planning System and Flood Risk Management Guidelines 2009 introduce comprehensive mechanisms, such as Strategic Flood Risk Management (SFRA), for the incorporation of flood risk identification, assessment and management into the planning process. Implementation of the Guidelines is achieved through actions at the national, regional, local and site specific levels.

At City and County Level:

- Planning authorities will introduce flood risk assessment as an integral and leading element of their development planning functions under the Planning Code and at the earliest practicable opportunity in line with the requirements of these Guidelines.
- The new flood risk assessment system will be aligned with the existing Strategic Environmental Assessment (SEA) process introducing processes for identifying flood risk and determining what flood risk assessment is required and carrying out such assessments similar to the overall system for screening and scoping under the SEA process.
- City and county development plans will establish the flood risk assessment requirements for their functional areas including other planning authorities such as Town Councils and any local area plans (LAP) which may be supplemented by more detailed site-specific flood risk assessment required to comply with these Guidelines.
- Planning authorities will assess planning applications for development in accordance with the provisions of these Guidelines following the guidance of their own or any OPW Strategic Flood Risk Assessment and the application of the sequential approach and, if necessary, the Justification Test required by these Guidelines.
- Planning authorities will ensure that development is not permitted in areas of flood risk, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered and the risks should be mitigated and managed through location, layout and design of the development to reduce flood risk to an acceptable level.

- Planning authorities will ensure that only developments consistent with the overall policy and technical approaches of these Guidelines will be approved and permission will be refused where flood issues have not been, or cannot be, addressed successfully and where the presence of unacceptable residual flood risks to the development, its occupants or users and adjoining property remains. Under the Planning and Development Act 2000, planning permission refused for the reason that the proposed development is in an area which is at risk of flooding excludes compensation.

1.3 Core Objectives of the Guidelines

The Core Objectives of the Guidelines are to:

- Avoid inappropriate development in areas at risk of flooding
- Avoid new development increasing flood risk elsewhere, including that which may arise from surface water run-off
- Ensure effective management of residual risks for development permitted in flood plains
- 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 all natural environment and nature conservation are complied with at all stages of flood risk management.

These Guidelines outline methodologies for the transparent consideration of flood risk at all levels of the Planning Process, ensuring consistency of approach throughout the country. The Guidelines will contribute to the avoidance of minimisation of potential flood risk through a more systematic approach within a river catchment process.

The Key Principles are to:

- Avoid 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.

1.4 The Flood Risk Assessment Process

1.4.1 Scales Used for Flood Risk

Flood Risk Assessments (FRA) is required at different scales by different organisations for many different purposes. A hierarchy of assessments is necessary to ensure a proportionate response to the needs of organisations by avoiding the need for detailed and costly assessments prior to making strategic decisions.

Regional Flood Risk Appraisal (RFRA)

RFRA provide a broad overview of the source and significance of all types of flood risk across a region and also highlight areas where further more detailed study will be required. At this level, they are an appraisal and not an assessment.

Strategic Flood Risk Assessment (SFRA)

SFRAs are necessary for Development Plans and Local Area Plans and provide a broad (area-wide) assessment of all types of flood risk to inform strategic land use planning decisions. SFRAs enable the local authority to undertake a sequential approach, including the Justification Test, allocate appropriate sites for development and identify how flood risk can be reduced as part of the development plan process. The level of detail will differ between plans.

Site-specific Flood Risk Assessment (Site FRA)

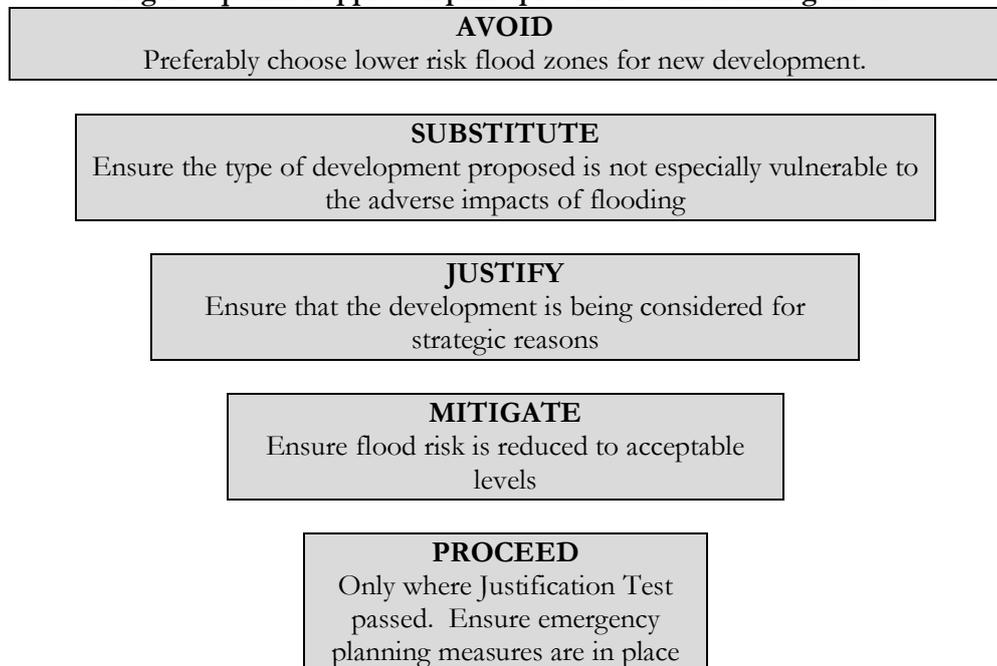
To assess all types of flood risk for a new development. FRAs identify the sources of flood risk, the effects of climate change on this, the impact of the development, the effectiveness of flood mitigation and management measures and the residual risks that remain after those measures are put in place. Must be carried out in all areas where flood risk has been identified but level of detail will differ if SFRA at development plan level has been carried out.

A Strategic Flood Risk Assessment is the level of assessment required for the Local Area Plan Level.

1.4.2 The Sequential Approach

The Sequential Approach in terms of flood risk management is based on the following principles:

Fig 1 Sequential approach principles in flood risk management



A sequential approach to planning is a key tool in ensuring that development, particularly new development, is first and foremost directed towards lands that are at low risk of flooding. The sequential approach outlined above should be applied to all stages of the Planning process, particularly at the plan making stage. Flood zones are defined in the guidelines and form a crucial element in the sequential approach.

Flood zones are geographical areas within which the likelihood of flooding is in a particular range and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning. There are three types or levels of flood zones defined for the purposes of these Guidelines:

Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding);

Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding);

Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all areas of the plan which are not in zones A or B.

The Guidelines also categorise land uses and development types into three categories:

- Highly vulnerable development (including essential infrastructure)
- Less vulnerable development
- Water compatible development.

The land uses and types of development under each category are shown in Table 1 below

Table 1: Classification of vulnerability of different types of development

Vulnerability Class	Land uses and types of development which include*:
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; and 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 (SEVESO sites, IPPC sites, etc.) in the event of flooding.
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; and Local transport infrastructure.
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; and 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 on their own merits	

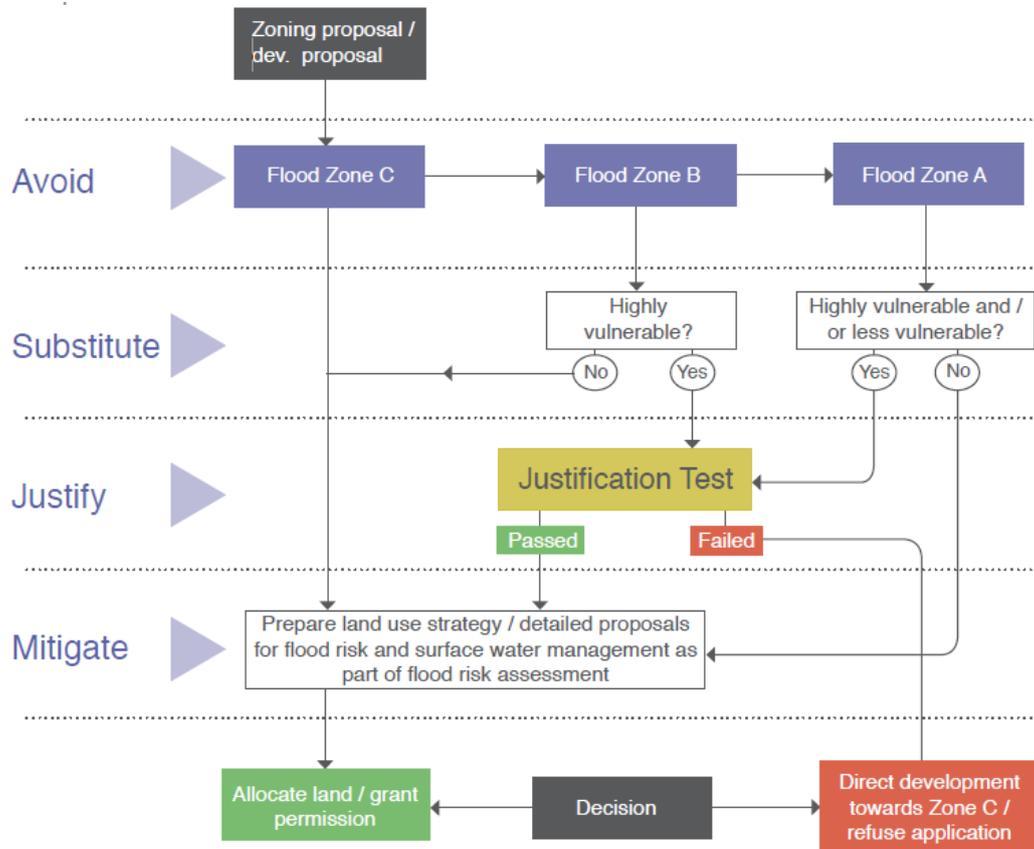
Table 2 below shows vulnerability versus flood zone to illustrate appropriate development and when to apply the Justification Test

Table 2 Vulnerability vs. Flood Zone

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

Figure 2 describes the mechanism for using the sequential approach in the Planning process.

Fig 2 Sequential approach mechanism in the planning process



1.4.3 The Plan Making Justification Test

The Justification Test is designed to rigorously assess the appropriateness, or otherwise, of particular developments that, for various reasons, are being considered in areas of moderate or high flood risk (JUSTIFICATION) The Plan-Making Justification Test is relevant to a Strategic Flood Risk Assessment for plans and is described as follows.

Where, as part of the preparation and adoption or variation and amendment of a development/local area plan, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 2, all of the following criteria must be satisfied:

1. The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, and 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.

1.4.4 The Stages of a Strategic Flood Risk Assessment

A staged approach should be adopted, carrying out only such appraisal and or assessment as is needed for the purposes of decision-making at the regional, development and local area plan levels, and also at the site specific level. The stages of appraisal and assessment are:

Stage 1 Flood risk identification

To identify whether there may be any flooding or surface water management issues related to either the area of regional planning guidelines, development plans and LAP's or a proposed development site that may warrant further investigation at the appropriate lower level plan or planning application levels;

Stage 2 Initial flood risk assessment

To confirm sources of flooding that may affect a plan area or proposed development site, to appraise the adequacy of existing information and to determine what surveys and modeling approach is appropriate to match the spatial resolution required and complexity of the flood risk issues. The extent of the risk of flooding should be assessed which may involve preparing indicative flood zone maps. Where existing river or coastal 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;

Stage 3 Detailed flood risk assessment

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. This will typically involve use of an existing or construction of hydraulic model of the river or coastal cell across a wide enough area to appreciate the catchment wide impacts and hydrological processes involved.

Table 3 Flood Risk Assessment Stages

	Flood Risk Identification	Initial Flood Risk Assessment	Detailed Flood Risk Assessment
Regional Flood Risk Appraisal	✓	U	U
Strategic Flood Risk Assessment County Plan	✓	P	U
Strategic Flood Risk Assessment Town Plan or LAP	✓	✓	P
Site-specific Flood Risk Assessment	✓	✓	✓

- P** Probably needed to meet the requirements of the Justification Tests
U Unlikely to be needed
✓ Required to be undertaken

1.4.5 Key Outputs from the SFRA

The Key outputs are:

- To provide for an improved understanding of flood risk issues within the Development Plan and development management process, and to communicate this to a wide range of stakeholders;
- To produce an assessment of existing flood defence infrastructure and the consequences of failure of that infrastructure and to identify areas of natural floodplain to be safeguarded;
- To produce a suitably detailed flood risk assessment that supports the application of a sequential approach in key areas where there may be tension between development pressures and avoidance of flood risk;
- To inform, where necessary, the application of the Justification Test;
- To conclude whether measures to deal with flood risks to the area proposed for development can satisfactorily reduce the risks to an acceptable level while not increasing flood risk elsewhere;
- To produce guidance on mitigation measures, how surface water should be managed and appropriate criteria.

2.1 Introduction

This Flood Risk Assessment has been carried out for the proposed amendments to the Charlestown-Bellaghy Local Area Plan 2010-2016, which includes phasing residentially zoned lands in Charlestown and designating undeveloped residentially zoned lands in Bellaghy as Strategic Land Reserve where an excess has been identified in the Core Strategies contained in the Mayo and Sligo County Development Plans.

The Flood Risk Assessment provides an appraisal and assessment of available flood risk data for the lands which are the subject of an amendment process within the Charlestown - Bellaghy LAP boundary. The process identifies flood risk indicators in each area and where it is demonstrated that lands may be at risk of flooding, recommends modifications to land-use zonings, incorporates objectives into the plan to minimise flood risk, or the carrying out of more detailed flood risk assessment as appropriate.

2.2 Stage 1 Flood Risk Identification

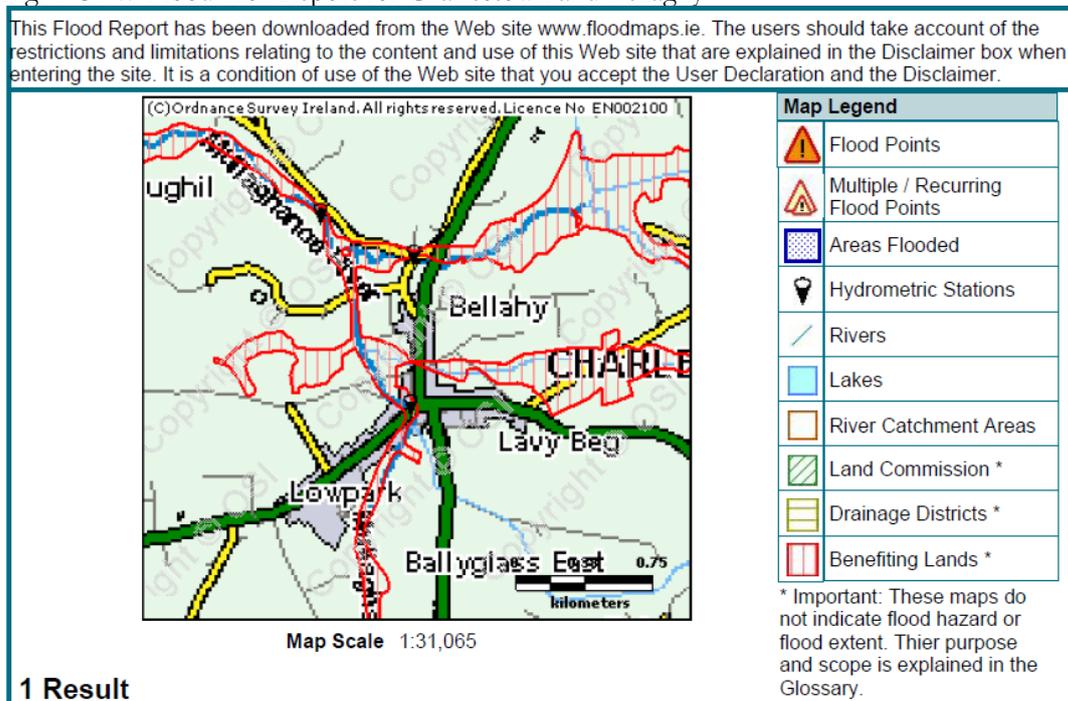
This Section identifies whether there may be any flooding or surface water management issues related to the plan area that may warrant further investigation. The following sources of information were used to identify possible flood risk for the amendment to the Charlestown - Bellaghy LAP.

2.2.1 Office of Public Works

The OPW is currently undertaking flood risk assessment mapping showing areas of significant Flood Risk in collaboration with the Local Authorities.

As part of the National Flood Risk Management Policy, the OPW developed the www.floodmaps.ie web based data set which contains information concerning historical flood data and displays related mapped information and provides tools to search for and display information about selected flood events. The nearest flooding event recorded on www.floodmaps.ie is located within 2.5km of the town boundary in County Sligo and is not dated.

Fig. 1 OPW Flood Risk Report for Charlestown and Bellaghy



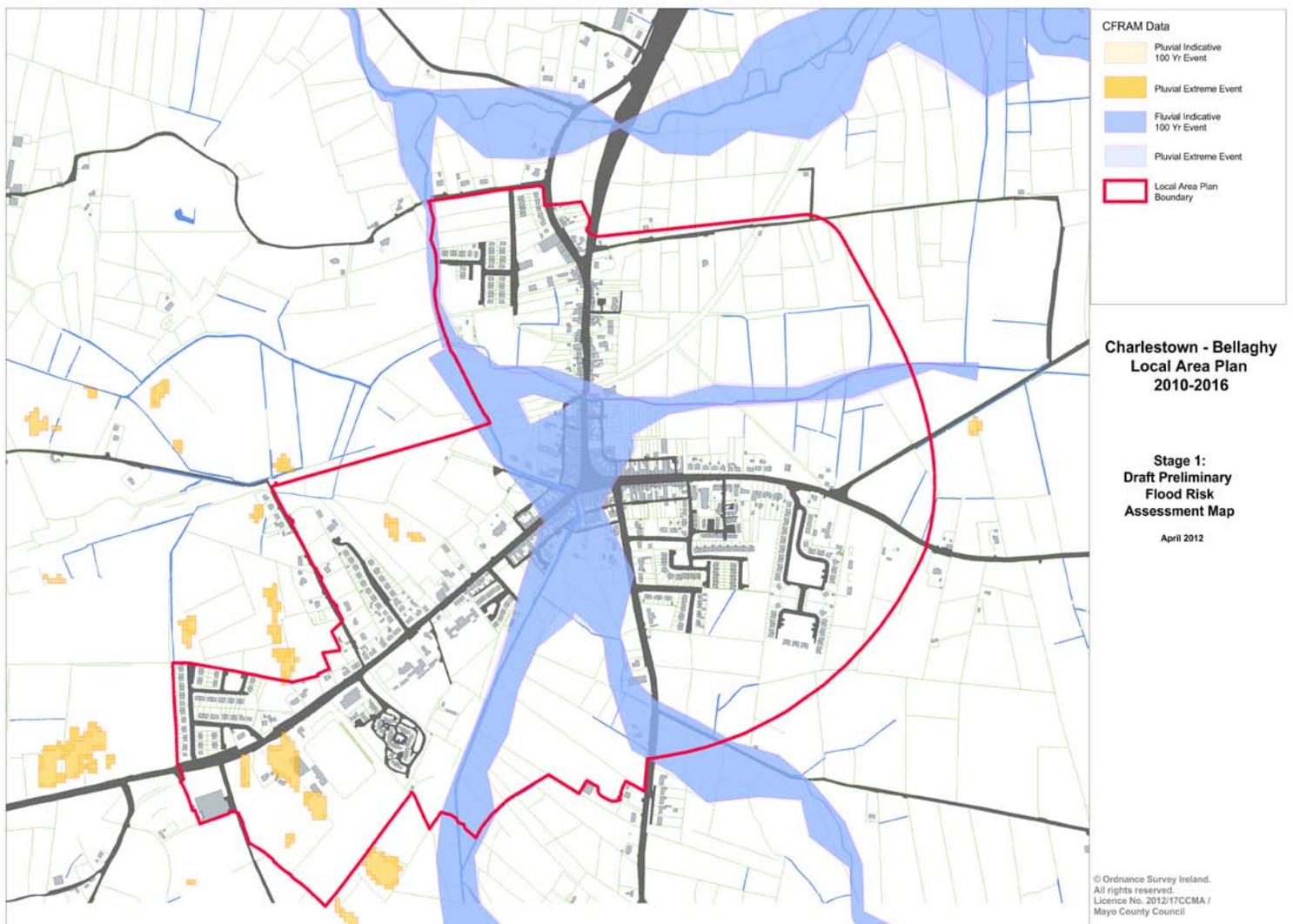
1. Sandyhill Recurring
County: Sligo

Start Date:
Flood Quality Code:3

The report shows that the plan area has benefiting lands in some areas. Benefiting lands are defined as a dataset prepared by the OPW identifying land that might benefit from the implementation of Arterial (Major) Drainage Schemes (under the Arterial Drainage Act 1945) and indicating areas of land subject to flooding or poor drainage.

Draft Preliminary Flood Risk Assessment Maps are now available from the OPW. Map 1 shows the PRFA data for the area within and around the Charlestown - Bellaghy LAP boundary. The Mullaghanoe River and its tributary Streams are identified as the main potential sources of flooding.

Map 1: Draft Preliminary Flood Risk Assessment Map for Charlestown-Bellaghy –



The Draft PFRA maps indicate that there are Fluvial – indicative (river flooding) and Pluvial – indicative and extreme (surface water) events within and adjoining the plan area.

The OPW will have flood hazard mapping by the end of 2013 and Flood Risk Management Plans by the end of 2015

2.2.2 6” (1:10560) Ordnance Survey Maps

6” Ordnance Survey maps include areas which are marked as being “Liable to Floods” the exact areas are not delineated but give an indicative indication of areas which have undergone flooding in

the past. The OS maps associated with the Charlestown - Bellaghy LAP did not give any indication of flooding within or adjoining the draft LAP boundary

2.2.3 Aerial Photography

Orthophotography from the OPW illustrate both Fluvial and Pluvial events and benefitting lands within and adjoining the plan area.

2.2.4 Other Sources of Information

The guidelines give a list of possible sources of information that may be available for the indication of flood risk events for the Charlestown and Bellaghy areas. This is not an exclusive list and other sources may be available. There are no other sources of information to indicate flood events for the Charlestown - Bellaghy LAP amendment.

2.3 Stage 2 Initial Flood Risk Assessment

Following Stage 1 Flood Risk Identification, if the planning authority considers that there is a potential flood risk issue, it should move onto Stage 2. The purpose of the initial FRA is to ensure that all relevant flood risk issues are assessed in relation to the decisions to be made and potential conflicts between flood risk and development are addressed to the appropriate level of detail.

2.3.1 Assessment of Flood Risks Identified for lands subject to amendment within the Charlestown - Bellaghy LAP boundary

The proposed amendment to the Charlestown – Bellaghy Local Area Plan 2010-2016 includes phasing residentially zoned lands in Charlestown and designating undeveloped residentially zoned lands as strategic land reserve in Bellaghy where an excess has been identified in the Core Strategies contained in the Mayo and Sligo County Development Plans.

The main flood risks identified for lands which are the subject of an amendment process within the Charlestown - Bellaghy LAP are outlined in Section 2.2 above. The main risk is from the Fluvial (flooding from rivers) – Indicative category. The draft PFRA map shows fluvial events along the Mullaghanoe River which flows through the towns.

The draft PRFA map also shows Pluvial flooding – indicative and extreme events within the LAP boundary in Charlestown.

A proportion of benefitting lands have also been identified in the plan area, some of which are located on lands which are part of this amendment process. These lands have been identified at various locations along the Mullaghanoe River.

2.3.1.1 Flood Risk in Charlestown

Using the sequential approach outlined above, 4 plots of all the lands which are the subject of the proposed amendment would be categorised as Highly Vulnerable due to their location in Flood Zone A, and the proposed residential zoning on these plots.

Lands located in Flood Zones A which are zoned for residential development in the proposed amendment to the Charlestown LAP which is classified as Highly Vulnerable (Table 1) are:

1. A large portion of Site C2 south of the town centre which is undeveloped. The Mullaghanoe River borders the western boundary of the site. This site is currently zoned New Residential. The amendment process proposes to phase these lands for residential development
2. Part of Site C3 south of the town centre which is undeveloped. The Mullaghanoe River borders the western boundary of the site. This site is currently zoned New Residential.

The amendment process proposes to phase these lands for residential development. Benefitting lands have also been identified on part of this site.

3. Part of Site C4 located to the south of the town centre. The Mullaghnoe River borders the western boundary of the site. This site is currently zoned New Residential and is undeveloped. The amendment process proposes to phase these lands for residential development
4. A plot of land located to the south of the town centre. The Mullaghnoe River borders the Eastern boundary of this plot which is currently zoned New Residential and undeveloped. The amendment process proposes to phase these lands for residential development. Benefitting Lands have also been identified at this location.

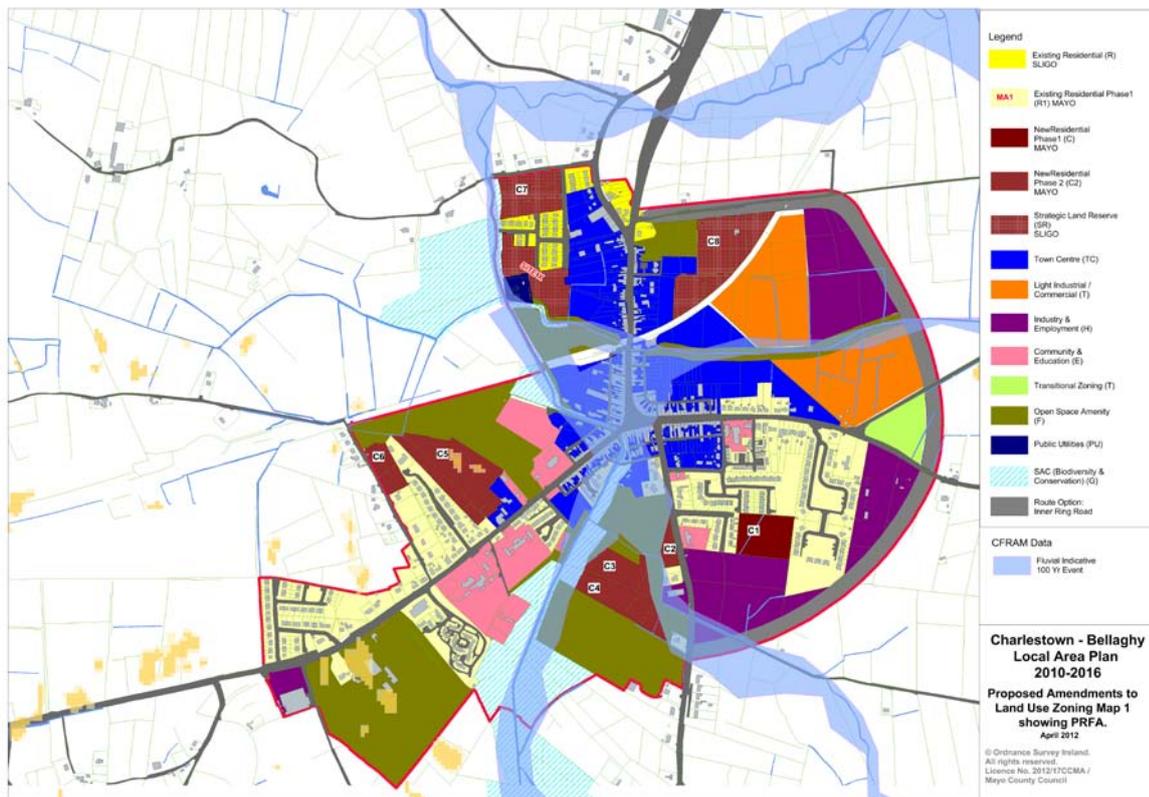
Table 2 indicates that a justification test is required on all four areas where it is proposed to phase lands currently zoned New Residential in the Charlestown LAP.

Taking the sequential approach avoidance of these lands for the proposed use (New Residential – Phase 2) is required.

2.3.1.2 Flood Risk in Bellaghy

The sites marked X, C7 and C8 in Bellaghy, zoned for residential uses, adjacent to the Mullaghnoe River and partially covered by the ‘benefitting lands’ designation as well as the Flood Zone A (Fluvial – indicative 100 years), are undeveloped. Therefore, the principle of avoidance can be applied by removing the possibility of developing multi-unit housing schemes during the lifetime of the LAP.

2.3.2 Land Use Strategy for the Proposed Amendment to the Charlestown - Bellaghy LAP



Mayo and Sligo County Councils have adopted a comprehensive risk-based planning approach to flood management to prevent or minimise future flood risk. In accordance with the Guidelines, the avoidance of development in areas where flood risk has been identified shall be the primary response.

Map 2 indicates the proposed land use zoning that will be included as part of the proposed amendment to the Charlestown - Bellaghy LAP, taking into account Draft PRFA Maps.

Following a justification test it is proposed to re-zones lands identified in Flood zone A in Charlestown, from their current zoning of New Residential to Open Space and Amenity which is an appropriate land use for Flood Zone A as outlined in Table 2 above. Taking a precautionary approach it is also proposed to re-zone lands currently zoned New Residential that lie within benefiting lands to Open Space and Amenity Use.

Residentially zoned lands in Bellaghy that are undeveloped are to be designated Strategic Land Reserve, whereby proposals for multi-unit housing developments on such lands will not be considered during the remaining lifetime of the Charlestown-Bellaghy LAP.

2.3.3 Flood Risk Management.

The land use zoning strategy has been prepared to avoid and manage any flood risk that has been identified for the area.

The next principle of the sequential approach is mitigation. Proposals for mitigation and management of flood risk will only be considered where avoidance is not possible and where development can be clearly justified with the guidelines' Justification Test.

Section **2.2.13 Flood Risk Assessment** and the **Flooding and Soil Erosion Policies** contained in the Mayo County Development Plan 2008-2016 are applicable to lands in Charlestown which are potentially at risk from flooding:

Among the most relevant Mayo CDP policies are the following:

P/ EH-F 1 It is the policy of the Council to restrict inappropriate development in areas at risk of flooding (whether inland or coastal), erosion and other natural hazards (refer to Development Management Standards: Section 4.8).

P/EH-F2 It is the policy of the Council to keep areas free of development that would be subject to an inappropriate risk of flooding or would cause or exacerbate such a risk at other locations. As part of this, the Planning Authority shall require a flood risk assessment and proposals for the storage and attenuation of run off/discharges (including foul drains) to ensure development does not increase the flood risk in the relevant catchment. This must accompany applications for planning permission for developments of areas exceeding 2 hectares.

P/EH-F3 It is the policy of the Planning Authority to require all large scale developments in the settlements identified in the County Settlement Strategy to incorporate "Sustainable Urban Drainage Systems" as part of the development proposals. Surface Water Management Systems should be designed in accordance with *Dublin Corporation Stormwater Management Policy for Developers*.

Section **10.6.2 Flood risk** and the **Flood risk management policies** contained in the Sligo CDP 2011-2017 are applicable to the lands in Bellaghy which are potentially at risk from flooding.

Among the most relevant Sligo CDP policies are the following:

P-FRM-9 Restrict development in areas at risk of flooding unless:

- It is demonstrated that there are wider sustainability grounds for appropriate development;
- The flood risk can be managed to an acceptable level without increasing flood risk elsewhere;
- The overall flood risk is reduced, where possible.

Developments considered necessary in order to meet the objectives of this Plan, or required on wider sustainability grounds, will be subject to the development management justification test outlined in chapter 5 of the Planning System and Flood Risk Management Guidelines.

Measures such as flood compensation storage works or new hard-engineered flood defences alone will not be acceptable as justification for development in flood risk areas. Such measures will only be considered as part of a proposal if the development is warranted by the justification test on planning and sustainability grounds in the first instance, and where no alternative site is available.

P-FRM-10 Require development proposals, where appropriate, to be accompanied by a detailed flood risk assessment in accordance with the provisions of the DoEHLG’s Planning System and Flood Risk Management Guidelines for Planning Authorities and to address flood risk management in the detailed design of development, as set out in Appendix B of the Guidelines.

The Amendment to the Charlestown LAP includes the following policy and objectives in relation to Flood Risk:

Objective: To protect areas prone to flooding within the LAP area from inappropriate development and to ensure that all new developments do not result in an increased risk of flooding within the site or on other lands. Applications for development in lands identified as being located in an area of flood risk, sites adjoining an area of flood risk, shall be the subject of a site specific Flood Risk Assessment appropriate to the type and scale of the development being proposed, in line with the DoELG Guidelines “The Planning System and Flood Risk Management” November 2009.

Objective: Applications for development on lands identified as benefitting lands, sites adjoining areas of benefitting lands, shall be the subject of a site specific Flood Risk Assessment.

Policy: It is a policy of the Council to comply with the EU Floods Directive 2007/60/EC and S.I. No. 122/2010: European Communities (Assessment and Management of Flood Risks) Regulations

2.4 Conclusion

As a result of the Flood Risk Identification; the Initial Flood Risk Assessment (Stages 1 & 2); the application of the sequential approach and justification test outlined in the Planning System and Flood Risk Management, Guidelines for Planning Authorities, DoEHLG, 2009 and The Planning System and Flood Risk Management Guidelines for Planning Authorities; Technical Appendices; DoEHLG, 2009; and the incorporation of mitigation measures into the Proposed Amendment to the Charlestown Local Area Plan, it is not considered necessary to subject the Proposed Amendment to the Charlestown-Bellaghy Local area Plan to Stage 3 Detailed Flood Risk Assessment.