

O'DONOGHUE ASSOCIATES
CHARTERED ARCHITECTS

CHURCHFIELD,
DOONBEG,
CO. CLARE.
M: 087 2896234.
E: aodonoghueassoc@outlook.com

21st March 2022.

Draft Clare County Development Plan 2023-2029,
Planning Department,
Clare County Council,
Aras Contae an Clair,
New Road,
Ennis,
Co. Clare. V95 DXP2.



Re: "Submission to the Draft Clare County Development Plan 2023-2029."

Dear Sirs,

We wish to make the following Submission/ Observation regarding the general zoning of Lands at Doonbeg Village identified in the Draft Clare County Development Plan 2023-2029. (Volume 3d West Clare Municipal District) Doonbeg Local Area Plan. Volume 10c Strategic Flood Risk Assessment.

Item 1:

We note that the lands zoned 'TOU2' in the Current Clare County Development Plan 2017-2013 (As Varied) are located directly adjacent to the permanent residential estate of Churchfield.

The Proposed Draft Clare County Development Plan 2023-2029 has relocated this zoning and divided TOU2 into two sections, one to the east of the existing developed lands zoned tourism, and the other to the west.

We attach Local Area Plan Maps for Doonbeg, Current Development Plan and Draft Development Plan that identify the location of the lands zoned 'TOU2'.

'TOU2', positioned to the West is situated adjacent to the existing permanent residential estate at Churchfield and is also adjacent to the proposed permanent residential use of lands zoned 'R3' and 'SR1'.

'TOU2', positioned to the East is situated adjacent to the proposed permanent residential use of lands zoned 'R2' and is also adjacent to 'MU1' where mixed use can include for permanent residential use.

The Draft Doonbeg Local Area plan refers specifically to 'TOU1' in relation to the existing permanent residential estate.

Which states:

'TOU1 Tourism Lands.

It is an objective that: Any future development on TOU1 should be sympathetic to the existing permanent residential use adjacent to this site and should be sympathetic to the permanent nature of this use.

Considering the proposed location of 'TOU2' in the Draft Clare County Development Plan 2023-2029 and the proximity of this land zoned for tourism purposes to the existing permanent residential estate of Churchfield and also to the proposed residential uses 'R2', 'R3', 'SR1' and 'MU1', we believe that the Draft Doonbeg Local Area Plan should specifically refer to an objective for 'TOU2', similar to the objective for 'TOU1', as follows:

'TOU2 Tourism Lands.'

It is an objective that: Any future development on TOU2 should be sympathetic to the existing permanent residential use, and additionally should be sympathetic to the proposed permanent residential use adjacent to these sites, and should be sympathetic to the permanent nature of this use'

Item 2:

Access to 'R2', & the eastern section of 'TOU2'.

The lands identified as 'R2' & the eastern section of 'TOU2' connect with the L2030 Kilrush/Moyasta Road to the south. The speed limit on the L2020 is 80 km/h.

To attain an access onto the L2030 the sight distances/ sight lines of 160 metres in each direction are required. As a result of the alignment and curvature of the road at this location these Sight distances cannot be achieved from lands zoned 'R2' and the eastern section of 'TOU2'.

A vehicular access onto the L2030 at this location would not be permitted.

In view of the fact that access cannot be achieved onto the L2030, we request that the Local Authority make a detailed assessment of access to the Lands zoned and listed as follows: 'R2' and 'TOU2' to the west and east.

The location of access to the lands zoned above should be included and identified in the new Doonbeg Local Area Plan & Map, Clare County Development Plan 2023-2029.

Item 3:

Access to 'MU1' AND 'MU2'.

We also request how access to lands zoned 'MU1' and 'MU2' is attained. These lands are located behind the buildings on main street (N67) and the L2030 with no road boundary.

The location of access to the lands zoned above should be included and identified in the new Doonbeg Local Area Plan & Map, Clare County Development Plan 2023-2029.

Item 4:

Flooding and Flood Risk.

We refer to the attached Record Place Map Scale 1: 10,560.

As Stated in the Draft Clare County Development Plan: 4.42 Tidal and Coastal Flooding.

"The Doonbeg Settlement along the Atlantic Coastal Margin is vulnerable to tidal inundation from the Doonbeg River."

The Map demonstrates the location of the Doonbeg River, its tidal nature and connection to the Atlantic Ocean, the salmon weirs, the location of the water course where it traverses the zoned lands and discharges into the river.

This water course is also clearly visible on the Doonbeg Local Area Plan Zoning Map. The zoned lands and the existing developed lands zoned tourism are also clearly defined.

This water course passes under the L2030, Kilrush/ Moyasta Road, and resurfaces through the Green field site where the lands are zoned 'R2' and the eastern section of 'TOU2'. The water course traverses under the existing developed lands zoned tourism and continues in a south westerly direction.

The lands zoned 'R2', the eastern section of 'TOU2' experience persistent and frequent flood events from the Doonbeg River and the associated water course.

These flood events that occur at high tides and Spring tides result in considerable flooding that is frequently compounded by heavy rainfall.

The flooding of the watercourse and the surrounding lands is associated with the exceedance of channel capacity during higher river flows. This occurrence is typical of the Doonbeg river where the surrounding lands associated with the river and water course can remain flooded for several days.

We refer to the Draft Clare Development Plan 2023-2029, Doonbeg Local Area Plan, Volume 3d West Clare Municipal District which makes reference to flooding and flood risk as follows



Doonbeg River (not at high/ spring tide).



The Water course discharges into the Doonbeg River. Overflows onto lands at high/spring tides.



The water course indicated as it traverses the lands zoned 'R2' and 'TOU2' under normal conditions.

We refer to the Draft Clare Development Plan 2023-2029, Doonbeg Local Area Plan, Volume 3d West Clare Municipal District which makes reference to flooding and flood risk as follows

Flooding and Flood Risk.

'The Strategic Flood Risk Assessment in Volume 10(c) of this Plan advises that flood risk related to redevelopment of lands within Flood Zone A & B can be managed through appropriate Site Layouts and Building Layouts, with a site specific flood risk assessment to determine appropriate finished floor levels.'

We believe that the above statement in the Doonbeg Local Area Plan is inadequate and ambiguous. We suggest that we have identified an area of high vulnerability to flooding that has been zoned for development, 'R2' and the eastern section of 'TOU2'.

We refer to 2.4 Paragraph 1.6 below, which states the core objectives.

We further suggest that the intended use and proposed zoning of these lands are inappropriate for this type of development (refer to Table 5-1 below).

We propose that flood mitigating measures should be evaluated at this Draft stage of the County Development Plan including Justification Test, for the reason that to delay assessment until Design Stage may involve moving zoning objectives.

Refer to 2.5 below, The Sequential Approach and Justification Test. Figure 2.2.

As a consequence of the frequency and consistency of the flood events referenced above, we request that the Local Authority at this stage of the Draft Clare County Development Plan re-evaluate the zoning of 'R2' and eastern section of 'TOU2' which are located in a flood plain.

Flood risk for the lands zoned 'R2' and the eastern section of 'TOU2' must be assessed as early as possible in the preparation of the Draft Clare County Development Plan.

Refer to:

- 5. Approach to Flood Management.
- 5.1. The Strategic Approach.
- 5.52. Highly Vulnerable Development.
- 7.2. Settlements within Flood Zones A and B.

We quote the Local Authority's objectives as follows:

Draft Clare County Development Plan 2023-2029.
Volume 10c Strategic Flood Risk Assessment.

Which States:

1.1 Scope of Study.

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

2.4 Objectives and Principles of the Planning Guidelines.

Which States:

The 'Planning System and Flood Risk Management' describes good flood risk practice in planning and development management. Planning Authorities are directed to have regard to the guidelines in the preparation of Development Plans and Local Area Plans, and for Development Control Purposes.

The objective of the 'Planning System and Flood Risk Management' is to integrate flood risk management into the planning process, thereby assisting in the delivery of sustainable development. For this to be achieved, flood risk must be assessed as early as possible in the planning process.

Paragraph 1.6 of the Guidelines states the core objectives are to:

- **Avoid inappropriate development in areas at risk of flooding.**
- **Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off.**
- **Ensure effective management of residual risks for development permitted in flood plains.**

The 'Planning System and Flood Risk Management' works on a number of key principals, including:

- Adopting a stages and hierarchical approach to the assessment of flood risk.
- Adopting a sequential approach to the management of flood risk based on the frequency of flood (identified through flood zones) and the vulnerability of the proposed land use.

2.5 The Sequential Approach and Justification Test.

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

Figure 2.2 Sequential approach principals in Flood Risk Management.

Consists of a number of principles including:

AVOID – Preferably choose lower risk zones for new development.

SUBSTITUTE – Ensure the type of development proposed is not especially vulnerable to the adverse impact of flooding

4.42 Tidal and Coastal Flooding.

Which States:

"The Doonbeg Settlement along the Atlantic Coastal Margin is vulnerable to tidal inundation from the Doonbeg River."

5 Approach to Flood Management.

5.1 The Strategic Approach.

We refer to the following:

'Following the Planning Guidelines, development should always be located in areas of lowest flood risk first, and only when it has been established that there is no suitable alternative options should development (of the lowest vulnerability) proceed.'

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

Table 5-1: Zoning Objective Vulnerability.

Zoning Objective/ Designation.	Indicative Primary Vulnerability.	Flood Risk Commentary.
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Residential (New) (R2)	Highly Vulnerable.	JT required for all development within Flood Zone A & B.
Tourism (TOU2)	Water Compatible/ less Vulnerable/ Highly Vulnerable.	JT required for all Highly Vulnerable development within Flood Zone A & B or Less Vulnerable development in <u>Zone B.</u>

5.52 Highly Vulnerable Development.

'Development which is highly vulnerable to flooding as defined in the Planning System and Flood Risk Management includes (but is not limited to) Dwelling Houses, Hospitals, Emergency Services & Caravan Parks.

Volume 7. Flood Risk Assessment.

7.2 Settlements in Flood Zone A & B.

Zone A – High Probability of Flooding.

Zone B – Moderate Probability of Flooding

Doonbeg is identified as a settlement lying within these zones.

7.3 Climate Change.

'In addition to the current level of flood risk (either Fluvial or Coastal), this screening has identified a number of settlements which could be at significantly greater risk when future (Climate Change) Scenarios are considered'.

It is Local Authority policy to adopt a sequential approach to the management of flood risk based on the frequency of flood and the vulnerability of the proposed land use.

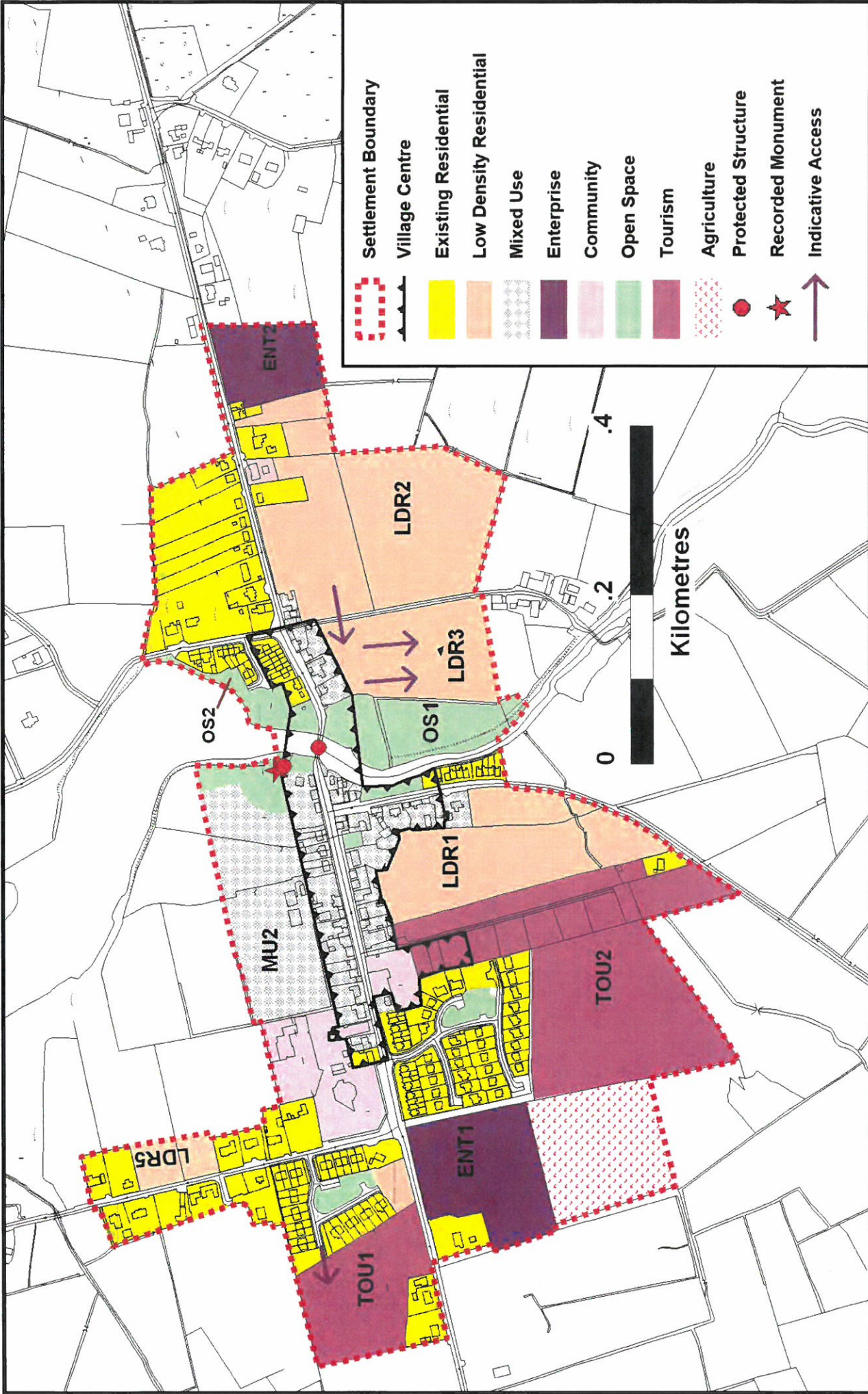
It is the objective of the 'Planning System and Flood Risk Management' is to integrate flood risk management into the planning process, thereby assisting in the delivery of sustainable development.

Yours faithfully,



O'Donoghue Assoc. MRIAI, CMRIBA.

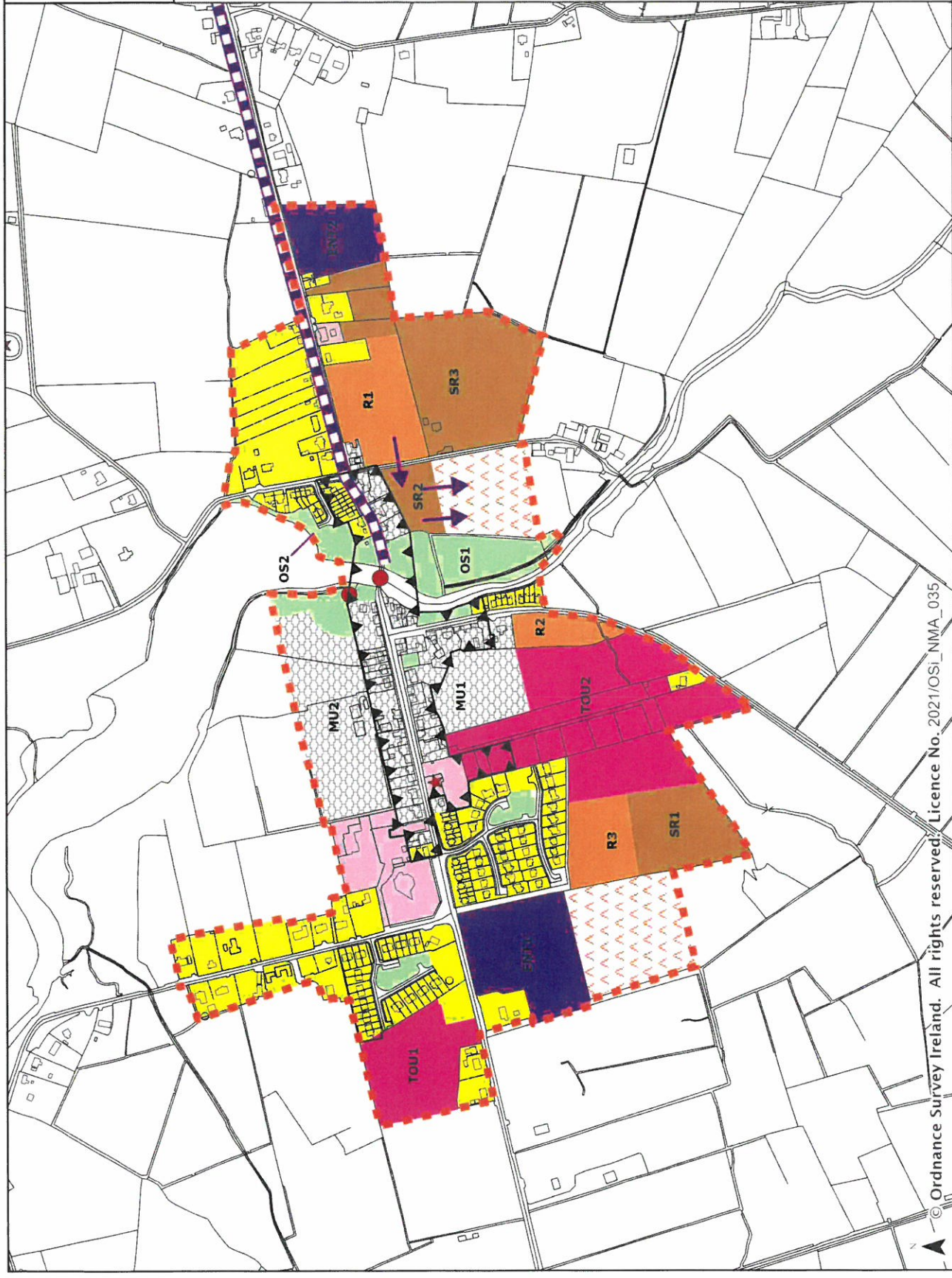




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Drawn By: Padraig McManus	Checked By: Helen Quinn	Scale: Refer to Scalebar	Date: January 2017



- Legend**
- Settlement Boundary
 - Town Centre Area
 - Built and Natural Heritage
 - Protected Structure
 - Recorded Monuments
 - Indicative Access
 - One Way
 - Pedestrian and Cycle Infrastructure
 - West Clare Railway
 - Greenway
 - Land Use Zoning
 - Mixed Use
 - Existing Residential
 - Residential
 - Strategic Residential Reserve
 - Community
 - Open Space
 - Tourism
 - Enterprise
 - Agriculture



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Draft Clare County Development Plan 2023 - 2029

Doonbeg



OS2 River Margin

This is an attractive landscaped area on the banks of the Doonbeg River with views of the castle to the west and Doonbeg Bay to the north. It is important that this area be protected and maintained.

MAR1 Existing Pier and Harbour Area on Doonbeg Bay

This area is reserved for the future development of the pier and land-based facilities for the development of water-based commercial activities and for tourism and leisure uses. Funding was recently awarded under the Dept. of Agriculture's 2021 Fishery Harbour and Coastal Infrastructure Development Programme for upgrades to the pier including the provision of a floating ramp for easy access between the pier and the existing floating pontoon platform.

It is important that all development that takes place around the pier head area is sympathetic to its sensitive location around two Protected Structures Doonmore Castle (RPS 277) and Doonmore House (RPS 554) and is in accordance with the proper planning and development of the area. In addition, it is important that development proposals for water-based commercial activities are compatible with the tourism and leisure potential of the pier and harbour. The sensitive enhancement of the area to provide amenity for visitors is encouraged in the pier area.

Doonbeg Pier is in close proximity to an SAC where otter activity has been recorded and is within an SPA which is home to the Tree Sparrow, a rare species associated with the SPA although not annexed. Future development proposals must not impact on the favourable conservation status of the SAC and SPA. Any plan or project with the potential to impact on the SAC and/or SPA will be subject to screening for appropriate assessment and associated ecological assessments.

Flooding and Flood Risk

The Strategic Flood Risk Assessment in Volume 10(c) of this Plan advises that flood risk related to redevelopment of lands within Flood Zone A and B can be managed through appropriate site layouts and building layouts, with a site-specific flood risk assessment to determine appropriate finished floor levels.

