

S2/995.



Draft Clare County Development Plan 2023-2029,
Planning Department,
Aras Chontae an Chlair,
New Road,
Ennis

Submission Re: Draft Clare County Development Plan 2023-2029

I wish to make a submission to Draft County Development Plan in relation to Volume 1 – 1.8 Proper Planning and Sustainable Development, Volume 10b-i & 10b-ii Land use zoning and Volume 10c Strategic Flood Risk Assessment.

The submission focuses on the Zoning of Land for Commercial Development and the Development of the West Clare Railway Greenway within the Miltown Malbay Settlement Boundary. Miltown Malbay has suffered, two recorded flood events in the past ten years. This greatly increases the Annual Exceedance Probability and places Miltown Malbay into the Flood Zone 'A' category of high probability of flooding.

Land use Zoning

COM3 has traditionally acted as a Floodplain with associated Public Surface Water Infrastructure and is a key resource of the Miltown Malbay Flood Relief Scheme. COM3 is the subject of a Section 179 Part VIII planning Application, Number 188005, and was adopted by the Elected Members in July of 2018. The Detailed Design of the Scheme has yet to commence including all Statutory SEA, NIR, AA, SFRS, EIA and EIS as the water from this floodplain discharges to a European Site. It must be noted the SEA for COM3 has either not been undertaken or has been omitted from all parts of Volume 10 of this Draft Development Plan.

COM3 has traditionally acted as a floodplain for overtopping water resulting in the flooding to the rear of properties on Church Street. To mitigate the risk of flooding, Clare County Council installed flood relief infrastructure within COM3 including a berm and associated floodwater inlets, funded by the OPW under the Minor Works Scheme. COM3 also contains a secondary watercourse only visible on Landdirect Mapping, further increasing the likelihood of flooding. It is critical that COM3 receives a Plan Making **Justification Test** and Strategic Flood Risk Assessment to ensure a robust and transparent engineering solution can be adopted, one which protects all the residents of Church Street, enabling sustainable development for the next generation. COM3 would be best placed for consideration as Green Infrastructure and water attenuation, particularly as existing flood mitigation infrastructure has already been installed by Clare County Council.

West Clare Railway Greenway

I would like to highlight the existence of a bridge located on the Old Bog Road. This bridge provides road access crossing of the Cleedagh River. It was constructed by the RIC/Board of Works to provide safe access to the settlement located on the Northern side of the river and also for the maintenance of the West Clare Railway line and associated infrastructure.

The proposed route for the Greenway transverses the N67, with no available access for pedestrians and cyclists to St Joseph's RC Church Carpark. This undoubtedly would be a serious Health and Safety

concern and require consideration for TII to delegate. The OPW and Clare County Council have the opportunity, to consider this historical route, to provide safe, direct access to carparking facilities and access point to the Greenway.

The Elected Members, Directorate and forward Planning Staff would do well to consider their statutory obligations in the preparation of the County Development Plan, particularly under;

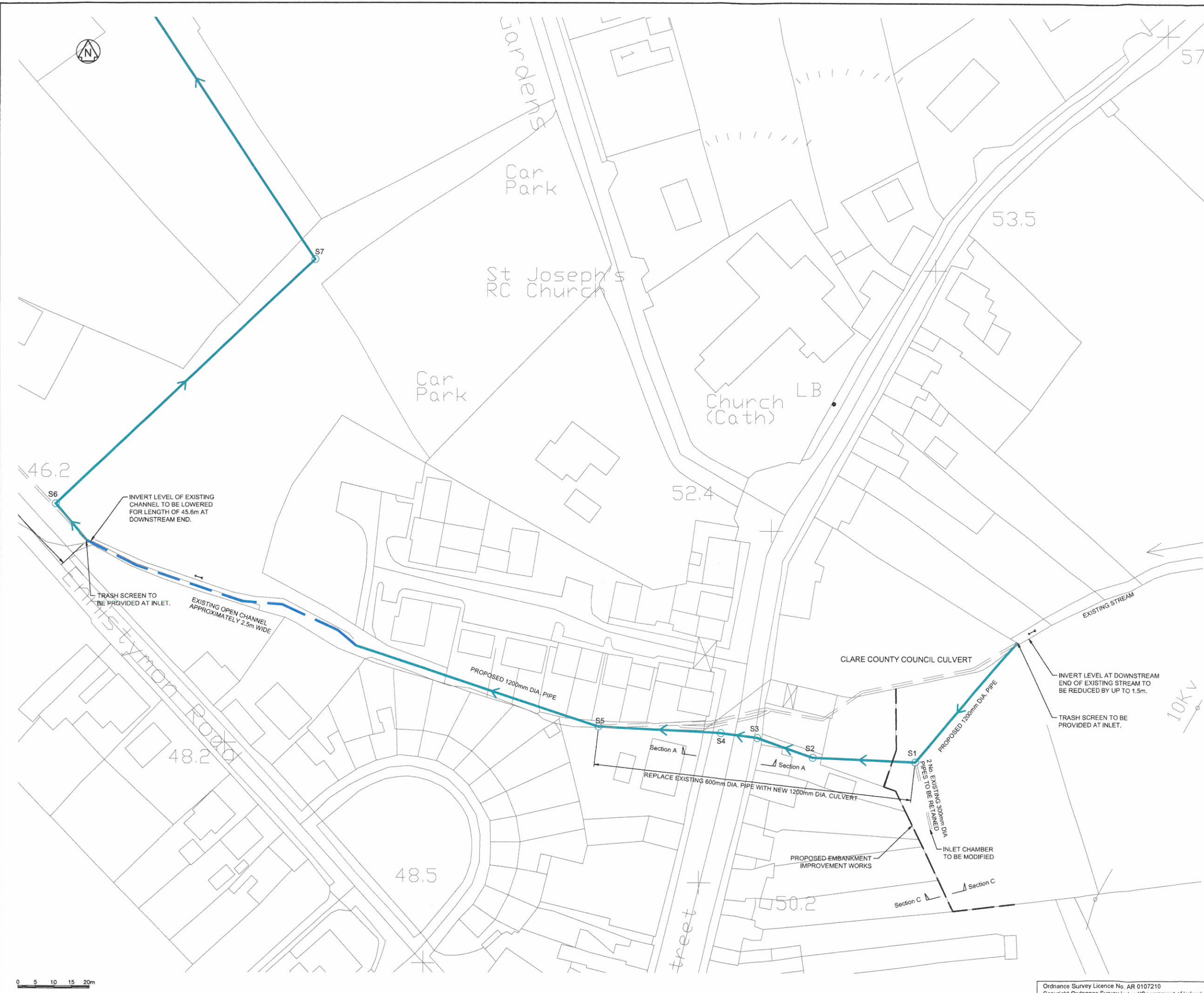
- Section 12 of the Planning and Development Act,
- Flood Risk Management (DoEHLG/OPW2009),
- Water Frame Directive Article 17,
- S.I No 272 of 2009 European Communities Environmental Objectives (Surface Water)

Signed

James O'Brien

Date

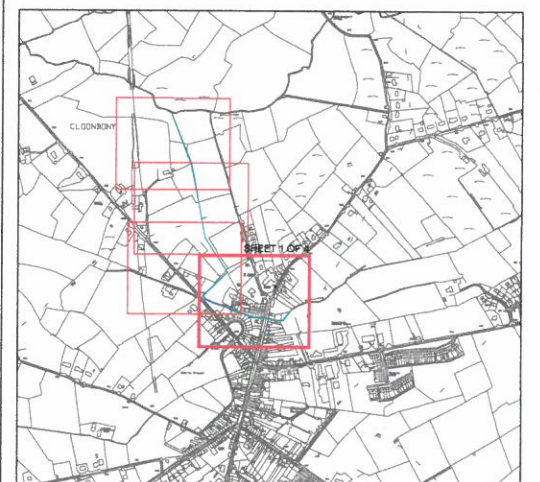
28/03/2022



- General Notes**
- All dimensions shown are in metres unless otherwise stated and levels in metres to Ordnance Datum.
 - Do not scale from this drawing. All dimensions must be checked/verified on site.
 - Any discrepancies noted on site are to be reported to the Engineer immediately.
 - All works in watercourses will be carried out with care to minimise the risk of pollution adhering to Pollution Prevention Guidelines.
 - The locations of any known services shown on drawing are approximate and for guidance only. The Contractor will confirm the location of any services prior to the commencement of any works.
 - The electronic model of this drawing is not to be used for setting out.



SITE LOCATION



KEY PLAN

- LEGEND**
- OPEN CHANNEL/DRAINAGE DITCH
 - PROPOSED 1200mm dia. PIPE/CULVERT
 - EXISTING CULVERT

Rev.	Modifications	Date	Drawn	Designed	Checked	Approved

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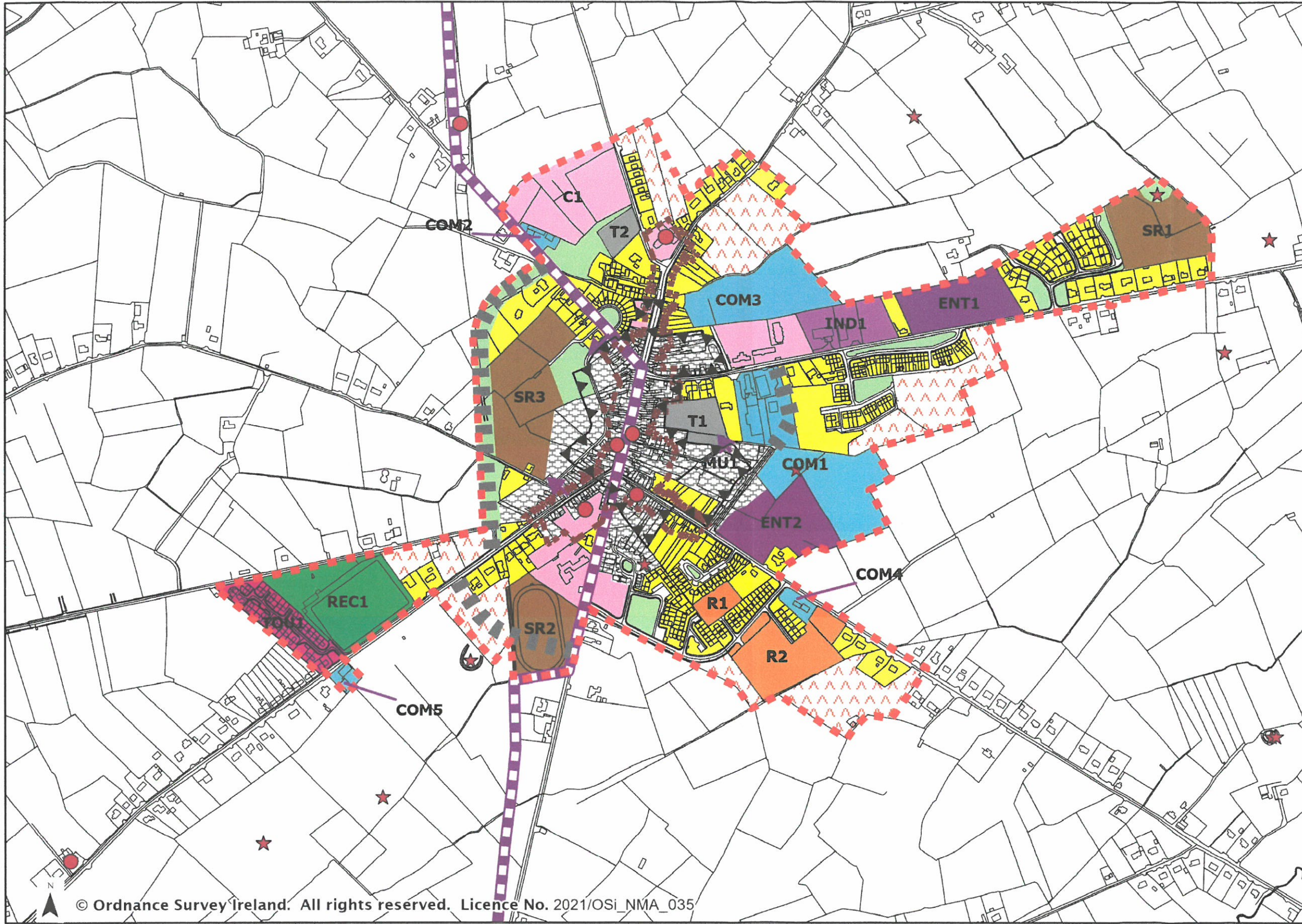
CLARE COUNTY COUNCIL
MILTOWN MALBAY FLOOD RELIEF SCHEME
EXISTING CULVERT LAYOUT AND PROPOSED MEASURES

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1:500 @ A1	Designed: LL	27/02/2018
	Checked: CW	27/02/2018
	Approved: DW	27/02/2018

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- Legend**
- Settlement Boundary
 - Town Centre Area
 - Built and Natural Heritage**
 - Protected Structure
 - Recorded Monuments
 - Architectural Conservation Area
 - Indicative Access**
 - One Way
 - Road and Rail Infrastructure**
 - Infrastructure Safeguard (Undefined)
 - West Clare Railway Greenway
 - Pedestrian and Cycle Infrastructure**
 - West Clare Railway Greenway
 - Land Use Zoning**
 - Mixed Use
 - Commercial
 - Existing Residential
 - Residential
 - Strategic Residential Reserve
 - Community
 - Open Space
 - Recreation
 - Tourism
 - Enterprise
 - Industry
 - Agriculture
 - Car Parks

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Draft Clare County Development Plan 2023 - 2029

Miltown Malbay



Date: December 2021 Scale: 1:10000



Historical Settlement
OPW Bridge

Car park

MILLTOWN MALBA
Sráid na Cathrach

Spanish Point
Rinn na Spáinneach