



CLARE
COUNTY COUNCIL

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Received
Planning Section



CDPVAR261-274



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1st April 2026
BY HAND

Mr Jason Murphy
Director of services,
Planning, Economic, Rural & community Development,
Clare County Council,
New Road,
Ennis.
County Clare.

Dear Mr Murphy,

Re: National Planning Framework review of CDP 2025 - 2026

Site at Sli an Fearghus Clarecastle – Response to rejection for rezoning inclusion

We refer to our written application for inclusion in the NPF rezoning review dated 18th December 2025 where we submit that this site complies with all the strategies as requested in the review matrix.

We therefore concentrate on the single item cited in the consequent email reply rejecting inclusion of this site from Helen Quinn dated 19th March as flood risk.



Artists impression of the site - extract from County Planning Files reference 07372 – as granted.

Ms Quinn makes the point for the first time in 10 years of detailed discussions that the sole reason for refusal and sterilisation of the site stems from its inclusion as flood risk following assessment by JGA Consulting assessed in National response to the catastrophic flood events of 2009.

Ms Quinn in her 19/03/2026 email cites the following principle reason for rejection of our application:

- *The lands were subject to a development plan level flood risk assessment by a Council appointed flood risk consultant using Flood Zones A & B and the following High-End Future Scenario flood risk areas, in line with the Revised National Planning Framework (NPF) NPO 78:*
- *CFRAM Fluvial 0.1% HEFS*
- *CFRAM Tidal 0.1% HEFS*
- *NCFHM 0.1% HEFS*
- *NIFM 0.1% HEFS*
- *It was found that the majority of the subject lands are within Flood Zone A and B and the CFRAM Fluvial and Tidal and the NCFHM 0.1% AEP HEFS areas. (see map below)*
- *The lands were considered not to meet the criteria for a Justification Test assessment as they lay within Flood Zones A and B and any residential land use is considered highly vulnerable to flood risk.*

Response.

Even though the site had been reduced in level by up to 1M below natural ground level for archaeological investigation (planning files) on foot of the above noted grant we note that this site was in fact not affected by this extreme fluvial flood event (no flood.ie nor local record) and is totally disconnected from such rainfall driven potentials.

The flood level referenced for this site as a combination of the above factors is **4.18m** OD at the 0.5% AEP (1-in-200 year) return period for this site and is derived from estuarine and coastal inundation modelling (JGA), not from fluvial (river) modelling of the small area of the catchment which is fully contained within the site and easily attenuated and discharged at low tide.

We shall consider the risk level from both coastal and fluvial derived flooding effects of 4.18MOD.

The current site average ground level (reduced) is approximately 3.4m OD, there is therefore a deficit of approximately 0.78m relative to the 0.5% AEP coastal flood level based on this artificial level.

The natural or original ground level was approximately 0.75m above the current level (Clare CoCo files) and therefore the original granted development easily providing for floor levels of **4.58m**, e.g, 400mm above the predicted flood risk level from coastal flood events and therefore was a safe grant in terms of flooding for 200 year event predictions (and the lesser 0.1%/100 year prediction).

This granted floor level is similar to the floor levels provided for in recent planning grants adjacent to this site to the North West and the encompassing occupied housing of the village.

The recently constructed OPW embankment averaging 5.1m OD is not considered in the above assessments (JGA) but does in fact provide for an additional circa 55mm of additional freeboard safety from such 200 year future predicted events (noted).

