

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029
Date: Wednesday 1 April 2026 10:58:19
Attachments: [2026_LTR_260401_OPW Observations_V1 Clare CDP 23-29_1.0.pdf](#)

Dear Sir/Madam,

Please find attached the OPW FRM submission for the consultation on Proposed Variation No. 1 to the Clare County Development Plan 2023-2029.

If further information or input is required, please do not hesitate to contact the OPW via floodplanning@opw.ie

Regards,
Rachel Woodward
Flood Risk Management - Climate Adaptation and Strategic Assessments

Please note that this address is only to be used in relation to spatial planning matters and development plans. Kindly please refrain from disseminating this email address to the public. Private individuals and businesses should be directed to send their comments and questions in relation to flood management to floodinfo@opw.ie

Email Disclaimer: <https://www.gov.ie/en/organisation-information/439daf-email-disclaimer/>



Oifig na
nOibreacha Poiblí
Office of Public Works



Planning Department,
Clare County Council,
New Road,
Ennis,
Co Clare.
V95 DXP2

01/04/2026

RE: Proposed Variation No.1 to the Clare County Development Plan 2023-2029

Dear Sir/Madam,

The Office of Public Works (OPW), as lead agency for the coordination of an integrated, 'whole-of-Government' approach to flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation No.1 to the Clare County Development Plan 2023-2029.

This submission is made specifically concerning flooding and flood risk management. Further submissions on the variation may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

Map Review Programme

Flood Mapping produced under the National CFRAM Programme is currently under review at Ennis, and updated mapping at Sixmilebridge is at post consultation and due to be published in the coming months. The OPW requests that Clare County Council note that the mapping in these areas may change as part of the review process. The latest information and update status of a map review is available at www.floodinfo.ie/map-review/.

Nature-based Solutions and SuDS

The OPW advises that the preparation of development plans should take account of the opportunities for nature-based solutions to reduce runoff and provide other benefits such as to water quality, biodiversity, etc. This can include in areas around existing developments, as well as within existing and proposed development in the form of Sustainable Urban Drainage Systems (SuDS). Clare County Council should refer to The Best Practice Interim Guidance Document 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas', as well as the Guidance Document for Planners, Developers and Developer Agents 'Implementation of Urban Nature-based Solutions' for further guidance.

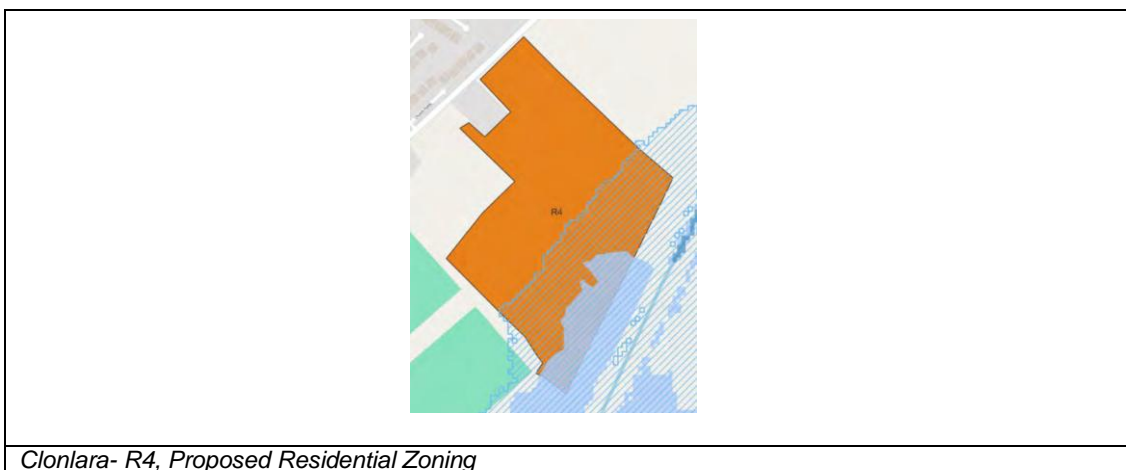
The Guidelines recommend that the Strategic Flood Risk Assessment provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.



Clonlara – R4

The *Residential* zoning overlaps with Flood Zone A and B, with construction of the development already underway. It is noted that the planning granted “*confines residential units to the land outside Flood Zones A/B and the 0.1% HEFS climate change extent. Areas within the mapped flood extents are utilised as open space.*” Generally *Open Space* is considered water compatible type development. Clare County Council might clarify why the *Open Space* is zoned as highly vulnerable *Residential*. As per the Guidelines the sequential approach should be followed and lands at risk of flooding avoided.

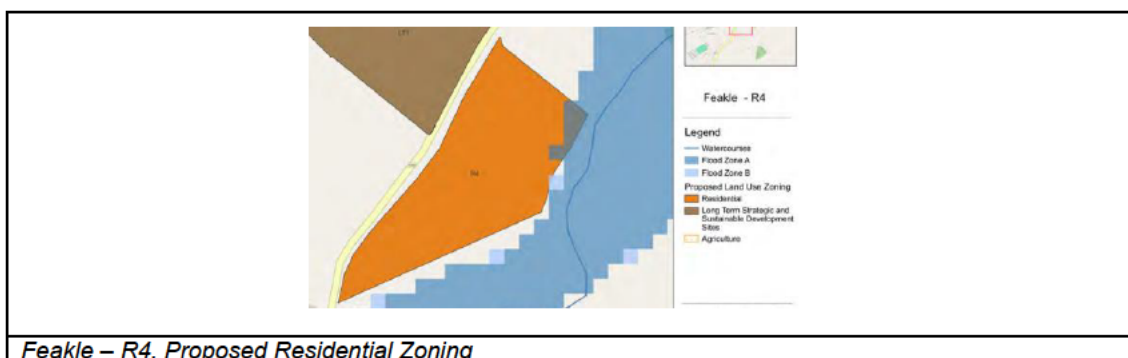
Clare County Council may include a comment if the site specific flood risk assessment was a detailed stage 3 assessment and if flood extents were produced how the extents compared with the National CFRAM extents. Detailed site specific flood risk assessments can be used to define the Flood Zones.



Feakle –R4

A small area to the east of the proposed *Residential* zoning overlaps with Flood Zone A and B. The Flood Zones in this area were established by indicative mapping produced as part of the County Development Plan. The SFRA notes that within Flood Zone A and B or HEFS 0.1% AEP extents “*The land should preferentially be retained as floodplain/green infrastructure.*” As per the Guidelines the sequential approach should be followed and lands at risk of flooding avoided. Clare County Council should review if they are satisfied with this mapping or if a detailed stage 3 assessment is required to inform the highly vulnerable *Residential* zoning, SFRA and planning decisions.

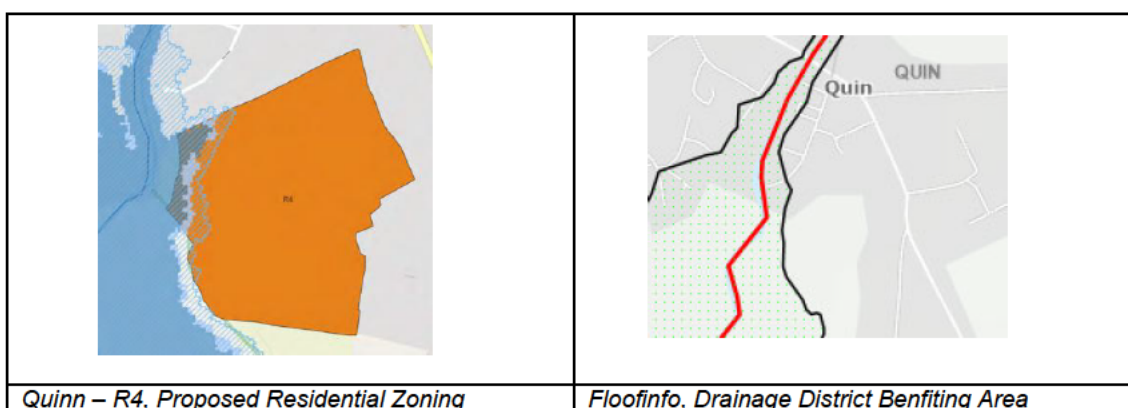
The SFRA states that “*The proposed site is not within the HEFS 0.1% AEP area*”, however HEFS 0.1% AEP extents are not shown on the map. Clare County Council should review, noting NPO 78 to “*Promote sustainable development by ensuring flooding and flood risk management informs place-making by.....Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.*”



Quinn – R4

A small area to the west of the proposed *Residential* zoning overlaps with Flood Zone A and B. The SFRA notes that within Flood Zone A and B or HEFS 0.1% AEP extents “*The land should preferentially be retained as floodplain/green infrastructure*”. As per the Guidelines the sequential approach should be followed and lands at risk of flooding avoided.

The proposed lands are within the benefiting area of a Clare County Council maintained Drainage District and there is no discussion regarding the Drainage District. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The OPW requests that Clare County Council has regard in zoning land for development to ensure that access requirements are preserved for the maintenance of Drainage Districts.



Doonbeg – R4 and R6

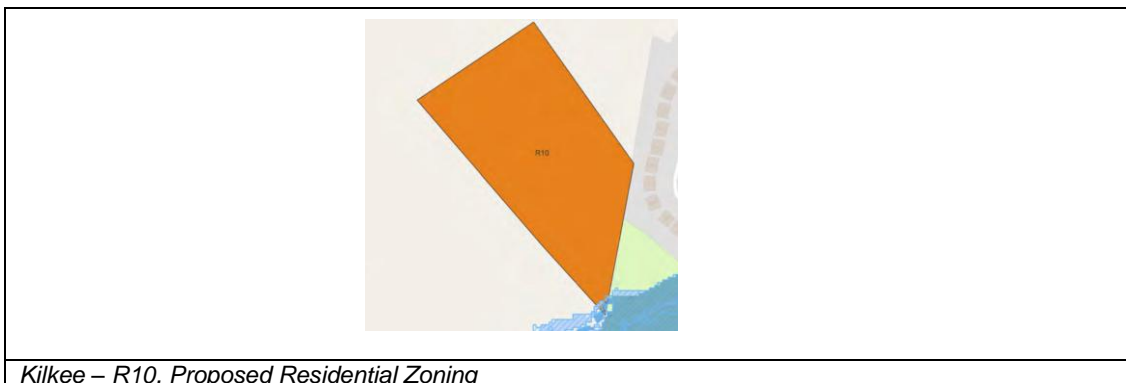
While the proposed *Residential* zonings are not within the flood zones there are small overlaps with the HEFS 0.1%AEP extents for both sites. The SFRA notes “*it is not appropriate for any highly vulnerable development (including roads/access routes) to occur within the 0.1% AEP HEFS climate change extent. The land should preferentially be retained as floodplain/green infrastructure*”. Clare County Council should review if the land use zoning should reflect the recommendation of the SFRA or set out how climate change will be addressed on these lands.

Kilkee – R10

There is a very small overlap of the proposed *Residential* zoning with Flood Zone A and B. The SFRA also states that this area “*coincides with the location of a flood embankment for*



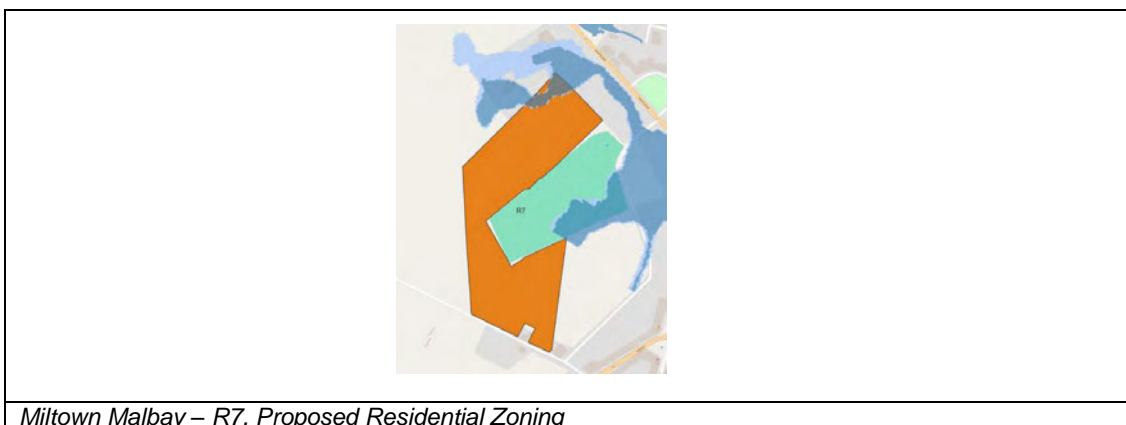
the Kilkee Flood Relief Scheme which will require a 5m wayleave from the embankment toe”. The OPW requests that zoning or development proposals support and do not impede or prevent the progression of these measures, and that a specific objective in this regard is included in the Plan. The OPW also requests that Clare County Council has full regard to the future protection, and the need for maintenance, of these schemes. Clare County Council should confirm with the Kilkee Flood Relief Scheme design team that the proposed 5m wayleave is sufficient. Development in this area may be premature until the scheme is completed.



Miltown Malbay –R7

A small area to the north of the proposed *Residential* zoning overlaps with Flood Zone A and B. The SFRA notes that within Flood Zone A and B “*The land should preferentially be retained as floodplain/green infrastructure*”. As per the Guidelines the sequential approach should be followed and lands at risk of flooding avoided.

The SFRA states that the lands are “*Sensitive to climate change impacts due to upstream culvert surcharging*”, however HEFS 0.1% AEP extents are not shown on the map. Clare County Council should review if climate change was assessed as part of the minor works study and note NPO 78 to “*Promote sustainable development by ensuring flooding and flood risk management informs place-making by.....Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.*”



Ballycannon North – R4

There is an unmapped watercourse in the vicinity of the proposed *Residential* zoning. The SFRA notes that “*aerial imagery does not show a discernible open channel at this location*”



and it is determined that “the site is unlikely to be in Flood Zone A and B due to the setback from the watercourse”. Clare County Council should determine if the watercourse is an open channel by undertaking a site visit, and should carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.



Ballycannon North – R4, Proposed Residential Zoning

Sixmilebridge – R8

The proposed lands are within the benefiting area of a Clare County Council maintained Drainage District and an OPW Arterial Drainage Scheme. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The OPW requests that Clare County Council has regard in zoning land for development to ensure that access requirements are preserved for the maintenance of Drainage Districts and Arterial Drainage Schemes.



Sixmilebridge – R8, Proposed Residential Zoning

Floodinfo, Drainage Map

Broadford – R3

While the proposed *Residential* zoning is not within the present day NIFM extents or the HEFS 0.1%AEP extents the lands are surrounded by the flood zones to the east, north and west, with existing residential properties to the south. Clare County Council should ensure that safe ingress and egress from the proposed highly vulnerable *Residential* lands can be achieved.



<p><i>Broadford – R3, Proposed Residential Zoning</i></p>	<p><i>Existing properties to the south of proposed lands</i></p>

Feakle – R5, R6 and R7

There are highly vulnerable *Residential* zonings proposed in the vicinity of what the SFRA describes as drainage features, however these are shown on EPA water feature mapping. Past flood event records for Feakle show that there is recurring flooding to the north and that flooding was experience in the village in 2015. Clare County should carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.

<p><i>Feakle – R5, Proposed Residential Zoning</i></p>	
	<p><i>EPA water feature mapping</i></p>
<p><i>Feakle – R6, Proposed Residential Zoning</i></p>	
<p><i>Feakle – R7, Proposed Residential Zoning</i></p>	<p><i>Floodinfo, Past flood events</i></p>



Mountshannon - LT1

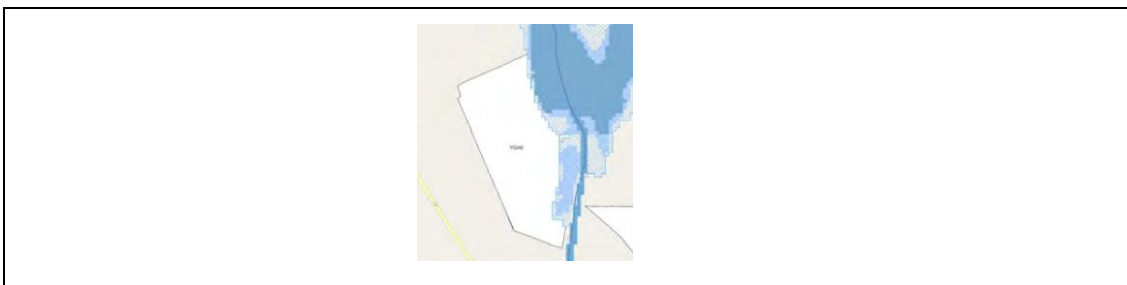
There are is a *Long Term Strategic and Sustainable Development Site* proposed in the vicinity of an unmapped stream and it is determined that “*the site is unlikely to be situated within Flood Zone A or B given its distance from the watercourse*”. Clare County Council should carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.



Mountshannon - LT1, Long Term Strategic and Sustainable Development Site

O’Callaghan’s Mills –VGA6

Unzoned lands are proposed as *Village Growth Area*. The SFRA describes the site as not within the flood zones or the HEFS 0.1%AEP extents. It is difficult to see the boundary of the site, however it appears to overlap with Flood Zone A and B. As per the Guidelines the sequential approach should be followed.



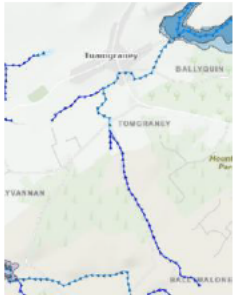


O’Callaghan’s Mills –VGA6, Proposed Village Growth Area

Tuamgraney - R5 and R11



There are highly vulnerable *Residential* zonings proposed in the vicinity of what the SFRA describes as drainage features, however these are shown on EPA water feature mapping. Clare County Council should carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.



		
<i>Tuamgraney – R5, Proposed Residential Zoning</i>	<i>Tuamgraney – R11, Proposed Residential Zoning</i>	<i>EPA water feature mapping</i>



Inch – VGA3

There are is a *Village Growth Area* proposed in the vicinity of what the SFRA describes as a drainage ditch, however these are shown on EPA water feature mapping. Clare County Council should carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.

	
<i>Inch - VGA3, Proposed Village Growth Area</i>	<i>EPA water feature mapping</i>

Kilmaley – VGA7 and VGA8


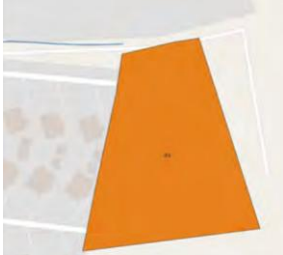

There are *Village Growth Areas* proposed in the vicinity of a stream. Site VGA8 has been sized to avoid the future extents produced as part of the NIFM programme. Clare County Council should carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.

	
<i>Kilmaley - VGA7, Proposed Village Growth Area</i>	<i>Kilmaley - VGA8, Proposed Village Growth Area</i>




Lahinch – R3 to R7

There are highly vulnerable *Residential* zonings proposed in the vicinity of what the SFRA describes as field drainage features or that “*aerial imagery does not show a discernible open channel at this location*”. Clare County Council should determine if the watercourse at site R7 is an open channel by undertaking a site visit, and for all sites carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.

		
<i>Lahinch - R3, R5 and R6, Proposed Residential Zoning</i>	<i>Lahinch - R4, Proposed Residential Zoning</i>	<i>Lahinch - R7, Proposed Residential Zoning</i>

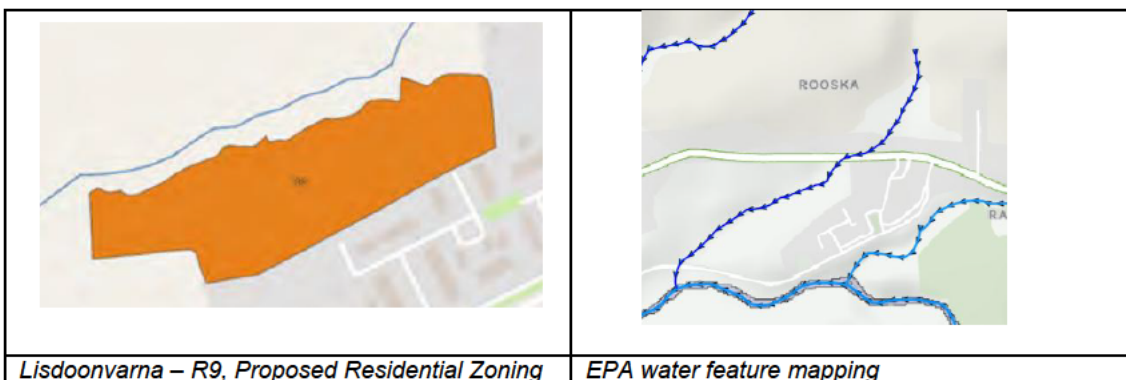
Lisdoonvarna – LT1

There are is a *Long Term Strategic and Sustainable Development Site* proposed in the vicinity of an unmapped watercourse to the east and what the SFRA describes a minor drainage feature to the south west. Clare County Council should carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.


<i>Lisdoonvarna – LT1, Proposed Long Term Strategic and Sustainable Development Site</i>

Lisdoonvarna – R9

There is a highly vulnerable *Residential* zoning proposed in the vicinity of what the SFRA describes as a drainage feature, however this is shown on EPA water feature mapping. Clare County Council should carry out a risk assessment and establish if a Stage 3 detailed flood risk assessment is required to be carried out to inform the land use zoning and planning decisions.



If further information is required please do not hesitate to contact the OPW (floodplanning@opw.ie).

Yours sincerely,

Rachel Woodward

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments