

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission – Proposed Variation No. 1 (PA3a–23a) – Objection to Rezoning of Site SR8 to Residential (R39), Pairc na Coille
Date: Thursday 2 April 2026 23:47:57
Attachments: [REDACTED]

To: Planning Department, Clare County Council, New Road, Ennis, Co. Clare

Re: Submission to Clare County Council Ref. Proposed Variation No. 1 to Clare County Development Plan 2023–2029

Proposed Amendment No. PA3a–23a – Rezoning of Site SR8 to Residential (R39), Cloughleigh/Drumbiggle



Dear Sir/Madam,

I wish to formally object to Proposed Amendment No. PA3a–23a, which proposes to rezone Site SR8 at Pairc na Coille from Strategic Residential Reserve to Residential (R39).

This proposed rezoning is inconsistent with Clare County Council’s own Development Plan, Biodiversity Action Plan, Strategic Flood Risk Assessment, and environmental reports, and therefore fails the test of proper planning and sustainable development.

1. FAILURE TO COMPLY WITH THE CORE STRATEGY APPROACH TO STRATEGIC RESERVE LANDS

Strategic Residential Reserve (SR) lands are, by definition:

-
- Not intended for immediate development

- Dependent on the resolution of constraints
- To be released in a plan-led and evidence-based manner

The proposed variation seeks to rezone SR8 without demonstrating that:

-
- Resolution of flood risk constraints
- Availability of adequate infrastructure
- Environmental capacity to accommodate development

This is contrary to the **phasing and sequencing principles** embedded in the Development Plan.

2. FLOOD RISK – NON-COMPLIANCE WITH SFRA AND DEVELOPMENT PLAN POLICY

2.1 SFRA Identifies Data Gaps and Need for Further Assessment

The Strategic Flood Risk Assessment clearly states that:

a detailed hydrological and hydraulic assessment is required for lands such as these

and that:

culvert blockage and residual risk must be assessed

No such detailed, site-specific modelling has been provided for SR8.

2.2 Inconsistency in the Council's Position

The SFRA and associated documents rely on:

- Limited datasets
- Absence of recorded flood events

However:

Absence of recorded flooding is **not evidence of absence of flood risk**

This is particularly relevant given:

- The presence of **karst geology (unpredictable groundwater behaviour)**
- The reliance on **culverted infrastructure of limited capacity**

- Historical mapping indicating lands nearby as “**liable to flooding**”
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2.3 Loss of Natural Flood Attenuation Function

The site currently performs a critical role as:

- A natural flood storage area
- A karst infiltration zone
- A buffer protecting downstream lands

Development would:

- Replace permeable ground with hard surfaces
- Prevent infiltration into karst voids
- Increase surface runoff rates

This directly conflicts with Development Plan objectives on **flood risk management and climate resilience**.

2.4 Climate Change and Extreme Rainfall Not Properly Addressed

While the SFRA references climate change allowances, there is:

- No modelling of extreme rainfall scenarios
- No assessment of cumulative catchment impacts
- No analysis of downstream flood displacement

Given increasing frequency of extreme rainfall events, this represents a **serious omission**.

3. BIODIVERSITY – CONFLICT WITH CLARE BIODIVERSITY ACTION PLAN

The Clare Biodiversity Action Plan emphasises:

- Protection of existing habitats
- Avoidance of habitat fragmentation

Maintenance of ecological corridors

- Integration of biodiversity into land-use decisions

The Pairc na Coille site:

- Is a mature woodland
 - Represents a significant biodiversity resource
 - Functions as a key ecological corridor within the urban area
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3.1 Direct Conflict with Biodiversity Objectives

Rezoning this site for residential use would result in:

- Loss of woodland habitat
- Fragmentation of ecological networks
- Disturbance to protected species

This is directly contrary to the stated objectives of the Biodiversity Action Plan.

3.2 Lesser Horseshoe Bat – Protected Species Considerations

The site is suitable habitat for the Lesser Horseshoe Bat, a species:

- Protected under EU legislation
- Dependent on woodland and linear landscape features

The Species Action Plan highlights:

- Sensitivity to lighting
- Importance of continuous habitat corridors
- Risks associated with development

Development at this location would:

- Introduce lighting and disturbance
- Fragment foraging routes
- Reduce habitat availability

This raises serious concerns under Appropriate Assessment requirements.

4. STRATEGIC ENVIRONMENTAL ASSESSMENT AND APPROPRIATE ASSESSMENT

The SEA and AA documents accompanying the variation identify:

- Potential for habitat loss
- Risks of fragmentation
- Pressure on ecological receptors

The Appropriate Assessment specifically identifies:

- Potential for significant effects on protected species

In such circumstances, rezoning should not proceed without full certainty that adverse impacts can be avoided.

That certainty does not exist in this case.

5. INCONSISTENCY WITH RECENT PLANNING DECISIONS

It is a matter of record that:

- Planning applications on these lands have been refused
- These refusals were upheld by An Bord Pleanála

The reasons included:

- Flood risk concerns
- Ecological impacts
- Prematurity of development

There has been no material change in circumstances since those decisions.

It is therefore inconsistent to now promote these lands for residential zoning.

6. FAILURE TO APPLY THE PRECAUTIONARY PRINCIPLE

The rezoning of SR8 is being proposed despite:

- Incomplete flood risk assessment
- Identified ecological sensitivities
- Previous planning refusals

In such circumstances, the precautionary principle requires:

Avoidance of risk where uncertainty exists

Instead, the proposed variation introduces risk into a sensitive environment.

7. BLANKET REZONING APPROACH – LACK OF SITE-SPECIFIC ASSESSMENT

The variation appears to form part of a wider rezoning exercise driven by housing targets.

However:

- SR8 has unique constraints
- It cannot be assessed in the same manner as unconstrained lands

Proper planning requires **site-specific evaluation**, not a generalised approach.

8. CONCLUSION

The proposed rezoning of Site SR8:

- Is not supported by adequate flood risk assessment
 - Conflicts with the Biodiversity Action Plan
 - Raises significant Appropriate Assessment concerns
 - Contradicts recent planning decisions
 - Fails to apply the precautionary principle
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9. RECOMMENDATION

I respectfully request that Clare County Council:

Reject Proposed Amendment No. PA3a–23a

Rezone Site SR8 as:

- **Buffer Space, or**
- **Environmental Protection / Green Infrastructure**

This would reflect:

- The site's critical flood management role
- Its ecological importance
- The objectives of the Development Plan and Biodiversity Action Plan

Yours faithfully,
John Hodnett