

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023–2029 – Volume 3(c) – Quin – R10 – PA 3c-20c
Date: Friday 3 April 2026 15:13:34
Attachments: [REDACTED]

Dear Sir / Madam,

Please find attached a **Group Submission / Objection to Proposed Variation No. 1 to the Clare County Development Plan 2023–2029**, relating to **Volume 3(c) Killaloe Municipal District Settlement Plans – Quin Village – Site Objective PA 3c-20c (R10)**.

The submission is made on behalf of the parties listed in the document and is accompanied by OPW **CFRAM flood mapping extracts**, referenced at **Appendix A(iii)** and **Appendix A(iv)** of the submission.

Attachments:

1. Group Submission / Objection (PDF)
2. OPW CFRAM flood mapping extract – Quin (Sheet 1 of 5)
3. OPW CFRAM flood mapping extract – Quin (Sheet 2 of 5)

I would be grateful if you could acknowledge receipt of this submission by return email.

Kind Regards,

Paul Tighe

[REDACTED]

GROUP SUBMISSION / OBJECTION

Proposed Variation No. 1 – Clare County Development Plan 2023–2029

Volume 3(c) Killaloe Municipal District Settlement Plans

Quin Village – Proposed Amendment R10 (West of R1): Proposed residential zoning under Site Objective PA 3c-20c

1. Context and Purpose of this Submission

This is a joint submission by a group of neighbouring households whose properties directly adjoin or are immediately proximate to the lands proposed for residential zoning under Site Objective PA 3c-20c (R10), Quin Village.

We acknowledge that Proposed Variation No. 1 to the Clare County Development Plan 2023–2029 arises from a Government Directive requiring Planning Authorities to align Development Plans with the NPF Implementation: Housing Growth Requirement – Guidelines for Planning Authorities (2025), issued under Section 28 of the Planning and Development Act 2000 (as amended).

This submission does not oppose residential development in Quin in principle. Rather, it raises serious concerns regarding the suitability of zoning these particular lands, having regard to long-established and worsening flood risk, hydrological behavior and local planning precedent. These concerns go to the appropriateness of zoning at Development Plan stage and cannot be deferred to later assessment or technical mitigation.

2. Primary Objection – Flood Risk and Hydrological Reality

Flood risk and hydrological behaviour in the vicinity of the proposed zoning represent the primary and overriding concern of this joint submission.

As residents living immediately adjacent to the subject lands, the parties to this joint submission collectively have direct and long-standing experience of flooding within the wider Knocknagoug / Quin Gardens area and along the River Rine floodplain. In particular, residents have observed

- (i) fluvial flooding on nearby low-lying lands associated with elevated river levels and
- (ii) periods of surface water accumulation and poor drainage on adjoining lands during and after intense rainfall. These observations indicate a constrained receiving environment and a sensitivity to exceedance events in close proximity to the proposed R10 lands.

While the Strategic Flood Risk Assessment indicates that the proposed R10 lands fall outside Flood Zones A and B, this assessment is based primarily on historic flood mapping. Our experience on the ground demonstrates that flooding and drainage behaviour in this location has evolved in recent years, influenced by increased rainfall intensity, cumulative loss of permeable land and climate-driven hydrological change.

The Strategic Flood Risk Assessment prepared in support of Proposed Variation No. 1 recognises the limitations of historic flood mapping, the existence of unmapped fluvial flood risk, and the need to account for future climate change scenarios; in circumstances where such uncertainty exists, zoning decisions at Development Plan stage must apply a precautionary approach.

The lands proposed for zoning are located immediately adjacent to lands known to flood, with no meaningful buffer, as illustrated on OPW Floodinfo.ie flood extent mapping (Appendix A(ii)).

Residential development in this location would reasonably be expected to reduce natural infiltration and increase runoff volumes towards an already constrained receiving environment. This represents a fundamental and enduring constraint arising from the location of the lands, rather than a matter capable of resolution through site-specific design or technical mitigation at a later stage.

A detailed record of observed flooding events based on resident experience is provided at Appendix B.

In addition, OPW flood mapping, as displayed on Floodinfo.ie, including CFRAM modelled flood extents (Appendix A(iii) and A(iv)), indicates flooding potential in the wider area which contrasts with the historic mapping relied upon in the SFRA. This reinforces the concern that flood behaviour in Quin has evolved beyond historically mapped extents and that a precautionary approach is required at Development Plan stage.

3. National Context and Recent Flood Events

Recent flooding events in Ireland, including severe flooding along the east coast earlier this year, have highlighted at national level the consequences of development within flood-prone areas and in close proximity to functional floodplains.

In the aftermath of these events, repeated reference has been made by public representatives and agencies to the need for greater caution in plan-making, particularly where zoning decisions could increase flood risk to existing communities.

Against this national context, concerns regarding flood risk and drainage in this part of Quin are long-established and have arisen previously in the context of Development Plan zoning.

4. Established Planning and Engineering Concerns in Quin

Flood risk and drainage sensitivity in this part of Quin have previously been identified by Clare County Council as matters requiring careful consideration.

In the appeal to An Coimisiún Pleanála in respect of the Harcon Contractors Ltd development at Quin (Planning Authority Ref. 24-60410), the Planning Authority identified concerns relating to surface water management and the potential discharge of additional runoff to flood-affected areas within the village. The Planning Authority reports also noted the need for continued review of flood zones and flood mapping in Quin, reflecting acknowledged limitations in historic mapping and an evolving understanding of local flood behaviour.

These matters are directly relevant to the current Proposed Variation. They demonstrate that the receiving environment for surface water in Quin is constrained and that additional runoff has been identified by the local authority as a planning and engineering consideration of significance. In these circumstances, the application of the precautionary principle at Development Plan stage is warranted when assessing the suitability of lands for residential zoning in close proximity to flood-affected systems.

These considerations arise in a context where recent development in the vicinity has already resulted in a cumulative reduction in permeable surfaces, increasing surface water runoff pressures on the local drainage network.

The Proposed Variation indicates that access to the subject lands is via Clos Na Manach Road. In practice, access is indirect and reliant on movement through an established local residential estate road serving existing dwellings. This distinction is material at Development Plan stage and should be accurately reflected in the description of the lands.

Importantly, Development Plan zoning decisions are required to be based on the suitability of lands having regard to known constraints and available evidence at Plan-making stage. Where the appropriateness of zoning is contingent on future site-specific flood risk assessment, further flood mapping review or technical mitigation to establish whether development can proceed without increasing flood risk, this indicates that the lands are not suitable for residential zoning at this stage of the Development Plan process.

5. Historical Zoning Precedent

The suitability of lands in this location for residential zoning has been considered previously.

In or around 2011, lands to the rear of existing dwellings in this area were proposed for residential zoning as part of an earlier Development Plan process. Submissions were made raising concerns in relation to flooding and drainage conditions. Following consideration of those submissions, Clare County Council did not proceed with the proposed zoning of these lands.

While detailed mapping from that period is no longer available, the outcome demonstrates

that flooding and drainage constraints were sufficient to prevent zoning at that time. There is no evidence that these constraints have been resolved since then.

This reinforces the position that the lands remain unsuitable for residential zoning and that the current proposal does not materially differ in planning terms from the earlier proposal that was not adopted.

6. Other Considerations

The Proposed Variation notes that the site is within walking distance of village services, that access to any future development should be demonstrated from Clos Na Manach Road, and that, given its location within a Lesser Horseshoe Bat Potential Foraging Range, any proposed development will require a full bat survey.

While these are relevant planning considerations, they do not alter the core position set out in this submission. Even if such matters were addressed through further assessment or planning application-stage requirements, the flood risk and hydrological constraints affecting the subject lands would remain.

Conclusion

This joint submission has been made by residents whose properties directly adjoin or are immediately proximate to the lands proposed for residential zoning under Site Objective PA 3c-20c (R10).

While the need to support housing delivery in Quin is acknowledged, Development Plan zoning decisions must be based on land suitability and risk at plan-making stage. In this case, the lands are located immediately adjacent to a flood-affected system where flooding has been observed to extend beyond historically mapped extents and where material uncertainty remains regarding fluvial and surface water risk.

The Strategic Flood Risk Assessment prepared in support of Proposed Variation No. 1 recognises the existence of unmapped fluvial flood risk and the need to consider future climate change scenarios. Where such uncertainty exists, it is not appropriate to advance residential zoning on the basis that flood risk may be addressed at a later stage.

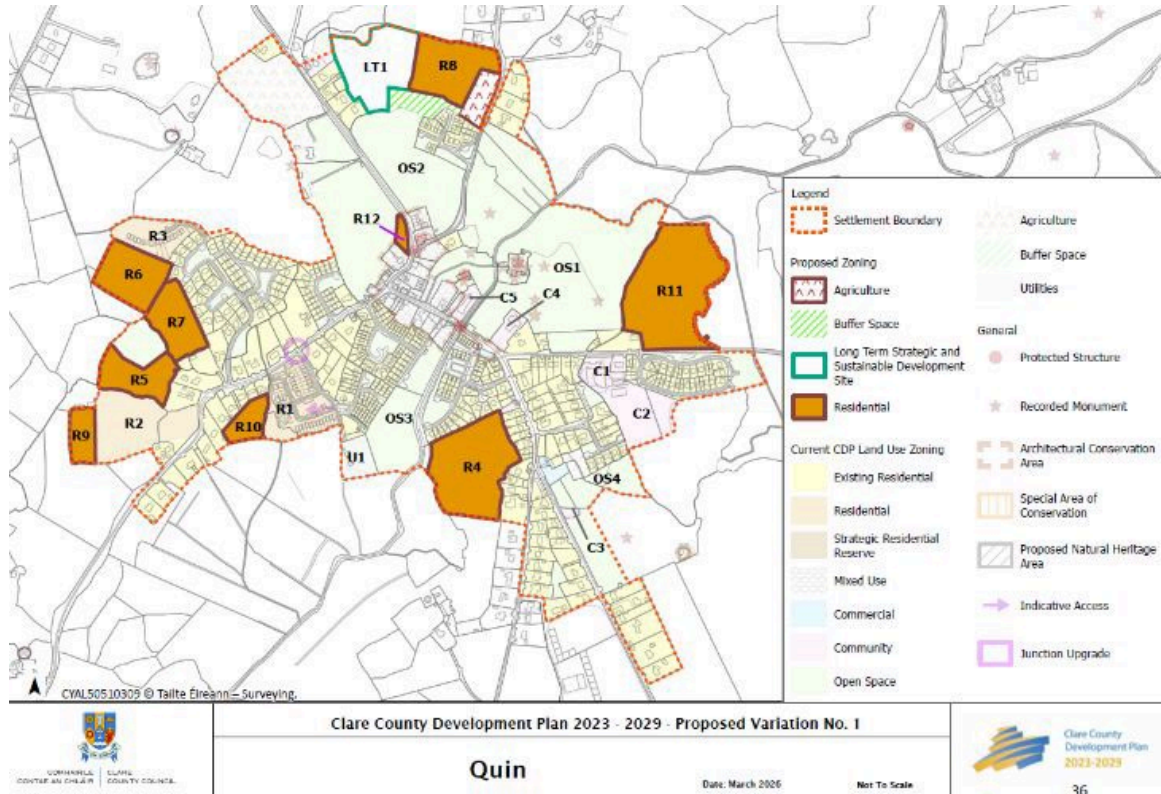
For these reasons, the parties of this joint submission respectfully request that Site Objective PA 3c-20c (R10) not be adopted at this stage of the Development Plan and that the lands be retained outside residential zoning.

Parties to this Joint Submission

Name	Address	Contact Email
Paul Tighe	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]
Tommy & Ina Cowley	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]
Brian & Irene Rochford	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]
John & Ann Crean	[REDACTED] [REDACTED]	[REDACTED]

Appendix A – Maps

Appendix A(i): Quin Settlement Zoning Map (Proposed Variation No. 1, March 2026), showing the location of Site Objective PA 3c-20c (R10).



Clare County Development Plan 2023 - 2029 - Proposed Variation No. 1

Quin

Date: March 2026

Not To Scale

Appendix A(ii): OPW Floodinfo.ie flood extent map, illustrating the close proximity of the proposed R10 lands to mapped flood-affected areas within the River Rine catchment.

Note: Floodinfo.ie mapping does not display Development Plan zoning boundaries. The approximate location of the R10 lands is indicated with a red X for reference purposes only.



Appendix A(iii):

OPW CFRAM flood mapping extract(s) (attached), illustrating modelled fluvial flood extents within the River Rine catchment in the vicinity of the proposed R10 lands.

Appendix A(iv):

OPW CFRAM flood mapping extract(s) (attached), illustrating the relationship between modelled flood risk areas and lands shown as liable to flooding on historic mapping.

Appendix B – Local Flooding Record and Resident Observations

This appendix records observed flooding affecting lands adjoining and in the vicinity of the proposed residential zoning at Site Objective PA-3c-20c, based on the direct experience of long-term residents whose properties are immediately proximate to the River Rine catchment.

The observations set out below are relevant to the assessment of fluvial flooding, surface water exceedance, and unmapped flood risk, as recognised within the Strategic Flood Risk Assessment prepared in support of Proposed Variation No. 1.

Residents have experienced recurrent flood events associated with high fluvial flows within the River Rine, resulting in the exceedance of channel capacity, overland flow, and prolonged surface water accumulation on adjoining lands. These events have occurred both within and beyond areas identified on historic flood mapping.

Recorded Flood Events and Observed Behaviour

November 2009

Significant flooding occurred in the Knocknagoug / Quin Gardens area, affecting a number of residential properties located outside mapped floodplains but adjacent to flood-affected lands. Floodwaters associated with elevated fluvial levels extended across low-lying lands and approached within approximately 20 yards of the rear elevations of dwellings. Clare County Council subsequently implemented flood protection measures, including flood barriers, indicating recognition of flood risk in this location. Floodwaters were also observed to discharge onto the adjacent public road network, resulting in surface water flooding to residential frontages.

November 2012

From 20 November 2012, and for a period exceeding one week, Clare County Council installed temporary pumping measures on the main road in the vicinity of Quin Gardens. These measures were required to manage surface water and fluvial exceedance associated with elevated water levels within the River Rine system, further demonstrating the constrained capacity of the receiving environment during flood events.

November 2015

Further flooding occurred in November 2015. A report prepared by Malachy Walsh and Partners in support of a Part 8 planning application (Ref. 228000) documented high fluvial flow conditions, with water levels exceeding the banks of the River Rine and extending across properties within the Knocknagoug area. This event is consistent with the SFRA's recognition of unmapped fluvial flood risk beyond formally modelled flood extents.

December 2017

On New Year's Eve 2017, Clare County Council again undertook pumping operations to alleviate the risk of severe flooding, indicating recurring exceedance events and limited

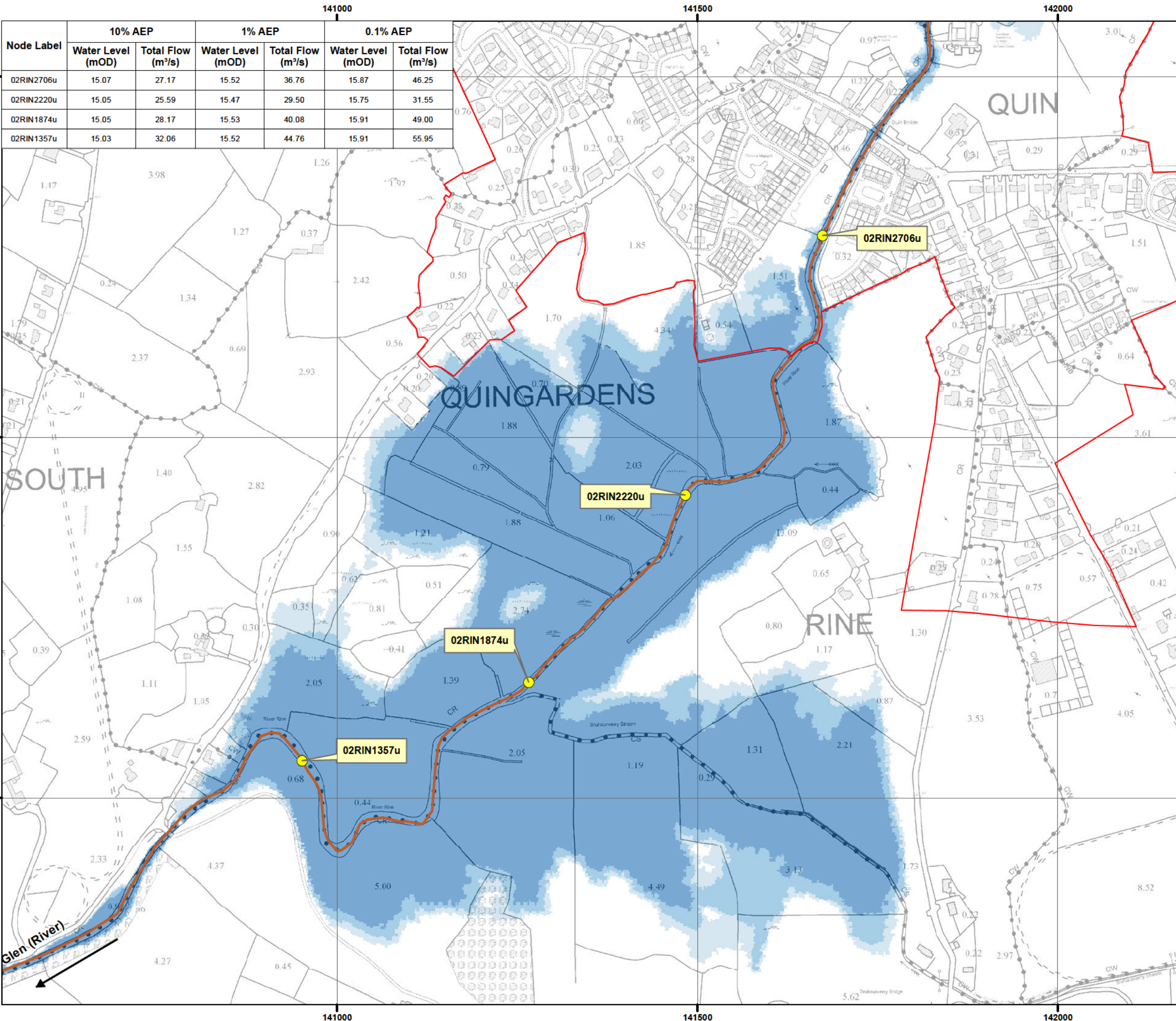
attenuation capacity within the local drainage system during periods of intense or prolonged rainfall.

Relevance to Development Plan Zoning

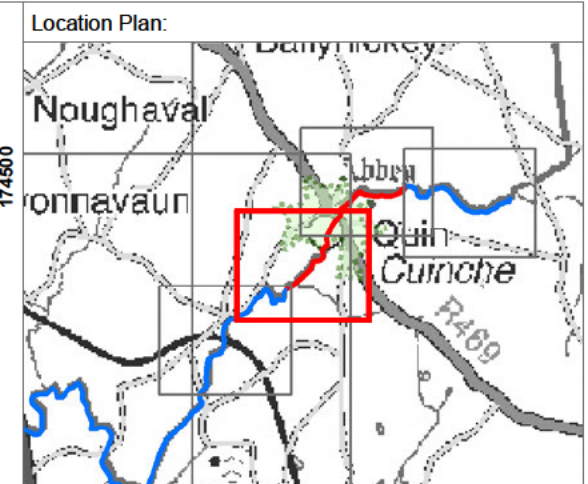
These observed flood events demonstrate that flood behaviour within this part of Quin is dynamic and evolving, influenced by high fluvial flows, surface water accumulation, and constrained discharge pathways. The recurrence of flooding requiring direct local authority intervention supports the position that flood risk in this location is not fully captured by historic flood mapping alone.

Having regard to the SFRA's acknowledgement of unmapped fluvial flood risk and the requirement to consider future climate change scenarios, residents consider that the lands adjoining the River Rine should be regarded as subject to material flood risk uncertainty at Development Plan stage. In such circumstances, the application of the precautionary principle is warranted when assessing the suitability of lands for residential zoning.

Having regard to this documented local flooding history, together with national and international concerns relating to climate change, residents consider that any flood risk assessment of lands adjoining the River Rine should give careful consideration to future flood scenarios, including those arising from increased rainfall intensity and altered hydrological behaviour.



Node Label	10% AEP		1% AEP		0.1% AEP	
	Water Level (mOD)	Total Flow (m³/s)	Water Level (mOD)	Total Flow (m³/s)	Water Level (mOD)	Total Flow (m³/s)
02RIN2706u	15.07	27.17	15.52	36.76	15.87	46.25
02RIN2220u	15.05	25.59	15.47	29.50	15.75	31.55
02RIN1874u	15.05	28.17	15.53	40.08	15.91	49.00
02RIN1357u	15.03	32.06	15.52	44.76	15.91	55.95



Legend:

- Nodes
- Model Reach
- AFA Boundary
- Flood Defence: Wall
- Flood Defence: Embankment
- Defended Area

10% AEP Fluvial Flood Extent
 (1 in 10 chance in any given year)

1% AEP Fluvial Flood Extent
 (1 in 100 chance in any given year)

0.1% AEP Fluvial Flood Extent
 (1 in 1000 chance in any given year)

IMPORTANT USER NOTE:
 THE VIEWER OF THIS MAP SHOULD REFER TO THE DISCLAIMER, GUIDANCE NOTES AND CONDITIONS OF USE THAT ACCOMPANY THIS MAP.

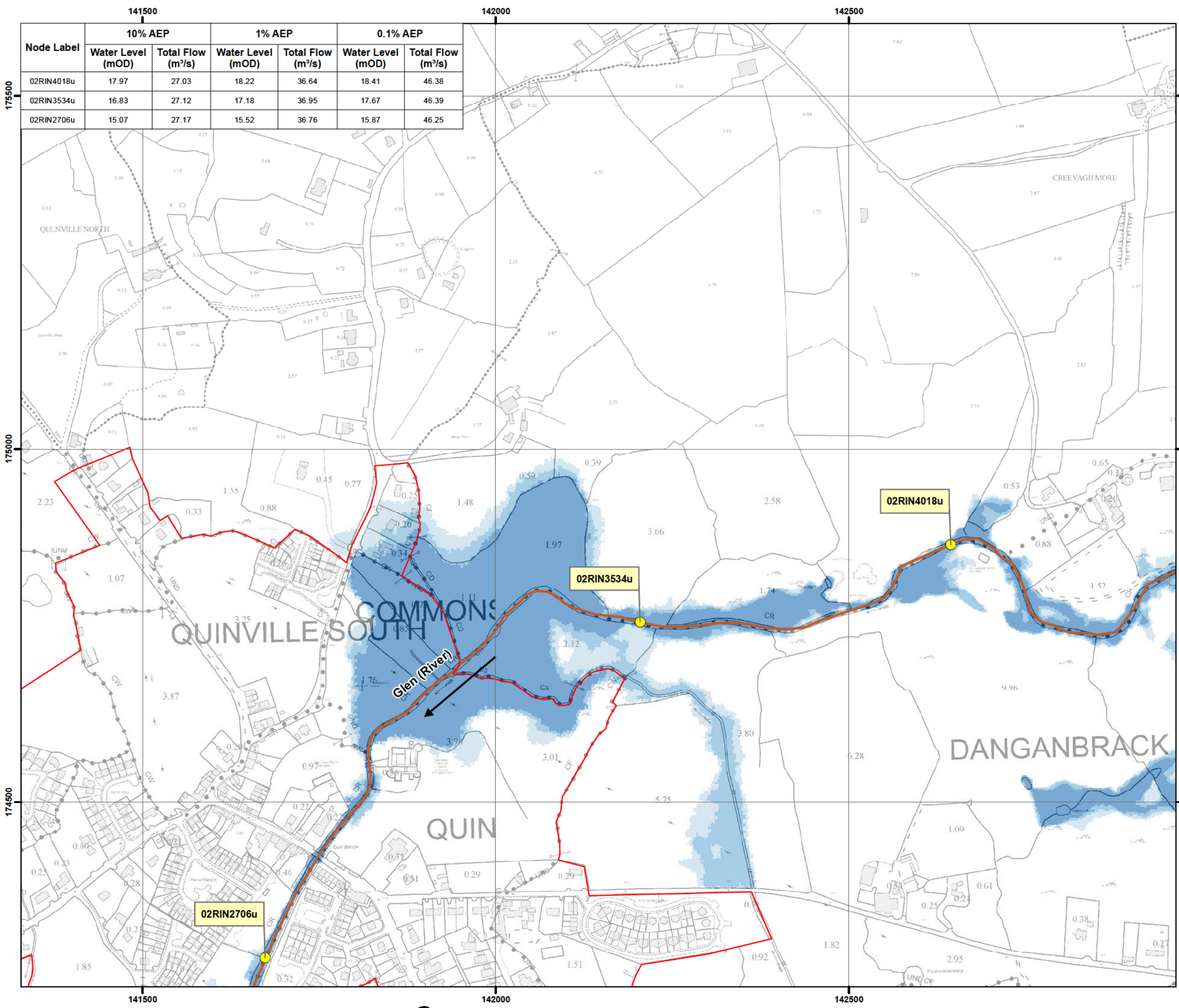


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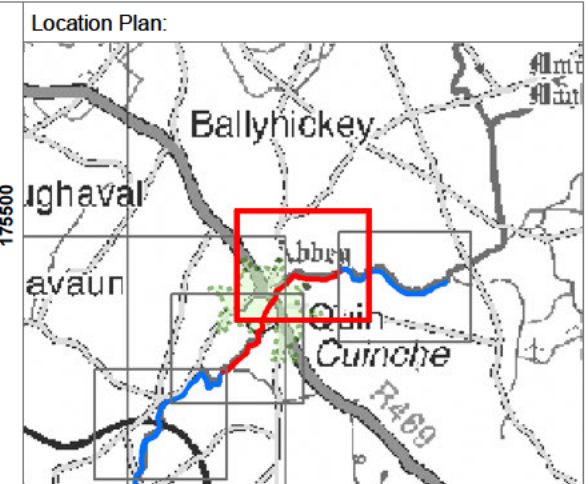


Merrion House
 Merrion Road
 Dublin 4
 D04 R2C5

Project:	SHANNON CFRAM STUDY
Map Type:	EXTENT
Source:	FLUVIAL
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Scenario:	EXISTING
Drawn by:	GH
Checked by:	AC
Reviewed by:	MC
Approved by:	PS
Map Number:	S27QUN_EXFCD_F1_01
Sheet:	1 of 5
Map Scale:	1: 5000
Date:	JUNE 2016
Date:	JUNE 2016
Date:	JUNE 2016
Date:	JUNE 2016
Revision:	0
Plot Scale:	1:1 @ A3



Node Label	10% AEP		1% AEP		0.1% AEP	
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02RIN3534u	16.83	27.12	17.18	36.95	17.67	46.39
02RIN2706u	15.07	27.17	15.52	36.76	15.87	46.25



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