

**From:** [REDACTED]  
**To:** [Development Plan](#)  
**Subject:** Submission to Proposed Variation No.1  
**Date:** Tuesday 7 April 2026 10:58:22  
**Attachments:** [REDACTED]

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Please see attached submission in relation to Proposed Variation No.1 to the Clare County Development Plan on behalf of Gort Na Null Residents Association.

Kind Regards  
Gort Na Null Residents.

**Re:** Variation No.1 to the Clare County Development Plan 2023-2029

**Location:** Sixmilebridge, Co. Clare

**Proposed Residential Zoning:** **R8 Sixmilebridge**

**Submitter:** Gort Na Null Residents Association

**Date:** 6<sup>th</sup> April 2026

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## 1. Introduction

We, the residents of Gort Ná Núll, Sixmilebridge wish to make a submission regarding the proposed residential zoning at **R8 Sixmilebridge**. Based on existing flood risk, ecological sensitivities, residential amenity and national policy requirements, we have serious concerns around the zoning of the lower end of these lands nearest to the boundary of Gort Ná Núll. While we fully appreciate and understand the current housing crises facing Ireland and the need to zone additional lands for residential development together with the requirement set by government to align the Clare County Development Plan 2023-2029 with the Housing Growth Requirement outlined in the National Planning Framework this should be done in a sustainable and equitable manner.

Our objection is not to the zoning of the entire site (R8) which we note is comprised of several different fields, it is to the proximity of the zoning to an extremely sensitive location in terms of flood risk and the ecological sensitivities of the associated lands.

We will set out here under our concerns with regards to the extent of zoning together with our recommendations for alteration.

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## 2. Flood Risk

While we appreciate that the zoning has been informed by the Strategic Flood Risk Assessment which accompanies the Variation, we feel this has not taken key factors into consideration. The Flood Risk Assessment correctly indicates that the lands proposed for zoning as residential are outside Flood Zones A or B together with the new High End Future Scenarios extents in terms of flood risk from Climate Change thus with no requirement for a Justification Test in line with the Flood Risk Guidelines. No further site-specific assessment has been undertaken as a result. What the zoning fails to take into consideration is the changes which have occurred in proximity to this site over the past number of years which have and will continue to exacerbate the flood risk beyond these mapped extents as we feel the full extent of Climate Change in the coming years which will inevitably put all our homes at risk.

The zoning for residential development commences just where the flood line currently tracks as can be seen in **Appendix 1 – Flood Risk Photos**.



### **Plate 1 Flood Extents directly adjacent to Residential Zoned lands at R8**

It is simply not appropriate to zone the lands directly adjacent to these flood extents as is outlined in the Proposed Variation at R8. It will put the new homeowners at unnecessary risk and worry when the Owengarney inevitably floods every year during the course of a normal winter flood extent and further risk of inundation when it reaches peak levels as were witnessed in November 2009 for a prolonged period until February 2010 when all of these fields were under water, the flood waters entered Gort Na Núll with pumps required 24/7 to keep the water out of the houses at the end of the estate. Confining the river into a narrow flood plain such as this, through unnecessary zoning for residential development will push the flood waters further into Gort Ná Núll or back on the properties on the Cratloe road as it will have nowhere else to go should new development take place which removes the capacity of the lands to attenuate the flood waters as a flood plain should naturally do.



A minor works scheme was undertaken by Clare County Council in Gort Na Null following these flood events which involved the construction of a soil embankment and non-return valves which provided protection to a number of homes at the end of the estate. This scheme serves to hold back the waters of the Owengarney when in flood, consequently, this leads to larger quantities of water flooding into the lands associated with R8 to the rear of Gort Na Núll. The main channel of the Owengarney was the subject of a Flood Relief Scheme in 1998 with 16 houses afforded protection from this scheme. consequently, when in flood the river floods into the lands directly to the rear of Gort Na Null as the embankment on the left bank prevents flood waters from accessing the lands on the Cratloe road. Lastly, a small stream runs along the boundary of Gort Na Null and the proposed zoning associated with R8 as is depicted in Figure 1. This stream has not been factored into the flood risk assessment associated with the zoning of R8.



Figure 1. Small Stream along boundary of R8 and Gort Na Null.

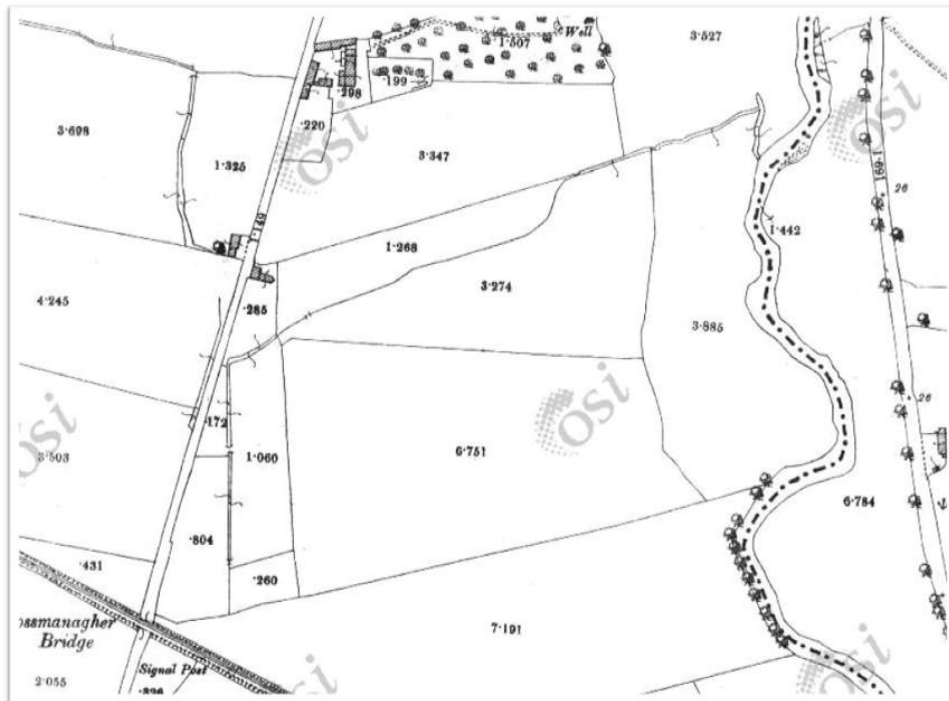


Figure 2 Small stream as seen on six-inch maps

This stream floods out into the fields associated with R8 during times of flood and ultimately joins up with the flood waters arising from the Owengarney River. While we note the inclusion of a 10m buffer to the rear of houses at the lower end of Gort Ná Núll this is deemed insufficient to protect the flood zone of the small stream. A more appropriate buffer zone of **at least** 20m is required to protect the riparian zone of this stream. This stream also takes surface water from the lands above it as the field rises to meet the Rossmanagher road with significant levels of silt visible in the channel during heavy rainfall in April 2024 when Gort Na Gréine was being built as is evidenced in **Figure 3**. This demonstrates that the small stream takes surface water run-off together with drainage from a considerable area of land and acts as a small stream to the Owengarney River downstream.



**Figure 4. Small stream to the rear of Gort Na Núll in flood April 2024 with high levels of silt arises from development at Gort Na Greine.**

In line with the Flood Risk Guidelines and the Clare County Development Plan 2023-2029 only sustainable residential development and its associated infrastructure that supports long-term climate adaptation and maintains or enhances biodiversity values associated with the wider landscape should be provided for in the proposed Variation. The zoning of the lands at the lower end of R8 currently do not reflect this requirement.

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### 3. Ecological Sensitivity

The small stream which runs to the rear of Gort Ná Núll also provides key habitat for both River and Sea Lamprey with anecdotal evidence of Sea Lamprey Redds recorded on the main channel of the Owengarney approximately 100m upstream by the small church in Sixmilebridge and Brook lamprey recorded in the small stream. The flood zone area regularly records heron and cormorants foraging on fish and eels in the main channel together with kingfisher. Otter are also regularly seen when the river is in flood.



**Figure 5 3 Cormorants on the banks of the river drying their feathers having dived for fish in 2017**

The most recent and notably presence recorded is the Hen Harrier (*Circus cyaneus*) who has been seen foraging and commuting over both Gort Ná Núll and the field to the immediate rear of Gort Na Null where the zoning as R8 is proposed for approximately 2 years now. While it hasn't been possible to obtain photographs of the species their presence has been noted with foraging behaviour witnessed numerous times. Two individuals have been recorded and while it is noted that the lands associated with R8 do not represent nesting or breeding grounds and are not associated with the designation of any European Site designated for the species they have been foraging within the area.

Hen Harriers typically forage up to 5 km from the nest site, using open bogs, moorlands, young conifer plantations and rough grassland, all of which occur in or near the proposed zoning area. The predominant habitat type present directly within the site is rough grassland with the main hedgerow in the middle of the site used for perching. Over the most recent spring 2026 period a single Hen Harrier has frequently been "chased" or "mobbed" by crows and/or rooks in defence of their

territory as they have established a rookery directly adjacent to R8 on the bank of the Owengarney. It is well documented that crows use this type of cooperative behaviour to harass or drive away larger predators from their nesting sites. Crows will try to overwhelm the harrier to force it to leave.



**Figure 6 Lands to the rear of Gort Ná Núll in R8 where Hen Harrier has been recorded.**

As a protected Annex I species, Hen Harrier habitats must be safeguarded from deterioration. Given the species' national conservation status and documented pressures including disturbance, habitat loss, afforestation cycles and development impacts a precautionary approach is necessary. Even if the area is outside any SPA boundary (which these lands are) it clearly functions as critical foraging habitat for the species which may be associated with populations on the 12 o'clock hills near Oatfield and Broadford as previously recorded. At the very least any zoning of these lands should include for Mitigation Measures which address the requirement for a robust Hen Harrier usage survey (multiple-season vantage point surveys) for the lands proposed to be zoned as R8.

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## 4. Impact on Privacy and Overlooking

The subject lands directly adjoin existing dwellings from house number 54 through to house number 62. Zoning the lands for residential use is likely to result in two-storey and/or higher-density development that would:

- Overlook existing private gardens and habitable rooms
- Reduce the sense of privacy that current residents enjoy and have done so for almost 20 years
- Create an unacceptable level of visual intrusion

Such outcomes conflict with standard planning principles requiring residential development to maintain adequate separation distances and protect existing amenity.

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## 5. Overbearing and Visual Impact

Given the considerable difference in site levels and topography the building heights of any future development could result in:

- An overbearing presence, particularly where new houses sit at a higher elevation
- Significant visual dominance over existing homes in Gort Na Núll
- Loss of outlook or daylight
- Loss of residential amenity from a number of homes in Gort Na Núll which currently enjoy views to the Cratloe Hills and down to the Owengarney River.

Residential Zoning should not be proposed where it would inevitably create structural and visual impacts that diminish residential amenity as this would be contrary to Strategic Environmental Assessment as outlined in the SEA to the Proposed Variation to the Clare County Development Plan which states the following in terms of the assessment of likely significant effects from the zoning of R8:

*The future construction of this development has the potential to generate a range of construction phase effects, including: effects on receiving biodiversity (e.g., habitat loss - such as loss of potentially important hedgerow or treeline present on-site, species disturbance - due to land-take or construction noise and dust, effects on aquatic ecology present at the Owenogarney river and its riparian zone), effects on local population (e.g., through noise, dust, traffic disruption), effects on receiving surface water and groundwater quality and flow (e.g., through hydrological changes, or the discharge of polluting material to surface water or soil/groundwater), effects on material assets, climate effects (e.g., through construction embodied carbon) or effects on landscape character and visual amenity (e.g., due to the construction of large-scale or visually impactful development). A bleach mill ruin is recorded as being present on-site. Proposed development may result in a loss of architectural/archaeological heritage associated with this feature.*

The assessment against the Strategic Environmental Objectives for R8 correctly identifies the potential for positive and negative impacts on Biodiversity, Flora and Fauna, Population and Human Health and Landscape and most notably just negative effects (no positive effects) on Soils and Geology, Water, Air Quality and Noise together with Cultural Heritage. For this reason, we provide the following recommendation as outlined in Section 6 of our submission.

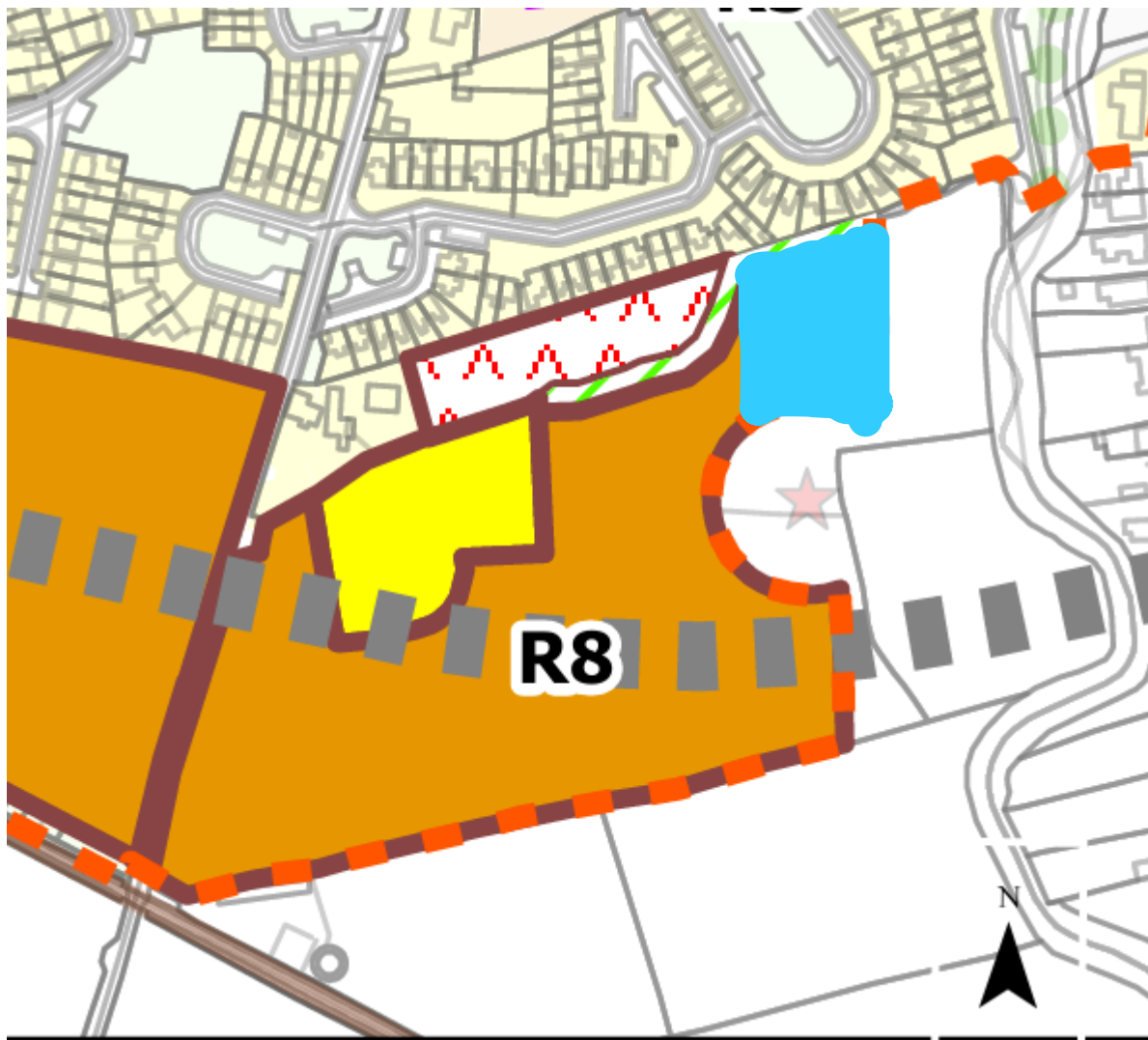
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## 6. Recommendation

For the reasons outlined above, and in accordance with the legal protections afforded to Hen Harrier and its associated habitats together with the requirement of the Flood Risk Management

Guidelines and the National Planning Framework we strongly recommend that the proposed residential zoning at R8 is altered to remove the following section from the Proposed Variation.

Instead, the lands should be designated as Open Space or Buffer zoning to provide for future climate change adaptation and flood risk together with providing the necessary protection in terms of the ecological sensitivities present. The lands can continue to be utilised for farming with horses, sheep and cattle all seen grazing here at different times of the year. The 10m buffer to the small stream should be expanded to at least 20m in order to protect the riparian zone of the stream.

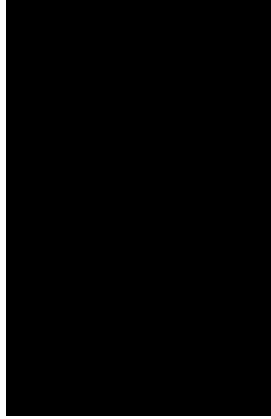


**Figure 7 Proposed Section of residential zoning to be removed from the Proposed Variation and re zoned as Buffer or Open Space highlight in blue.**

## 7. Conclusion

The proposed zoning presents an unacceptable risk to the privacy, character, safety, and overall amenity of existing residents in Gort Null which directly adjoin the proposed residential zoning at R8.

It is inconsistent with principles of proper planning and sustainable development in terms of impacts on flood risk together with ecological impacts. We therefore request that the zoning be amended in line with the recommendations in ~~Section 9.~~



Enc.

**Appendix 1 – Extent of flood risk on R8 lands**



**Plate 1 3<sup>rd</sup> January 2014 – works to connect to the wastewater infrastructure in the area proposed for residential zoning was completely inundated.**



**Plate 2– 6<sup>th</sup> December 2015**



**Plate 3 12<sup>th</sup> December 2015**



**Plate 4 12<sup>th</sup> December 2015**



**Plate 5 5<sup>th</sup> January 2016 sustained flooding on the lands.**



**Plate 6 Flood waters continue to over spill into the lands at Rosmanagher to the rear of Gort Ná Núll to completely cover the field to the rear and the adjoining fields.**



**Plate 7 & 8 Flood extents in 2018**



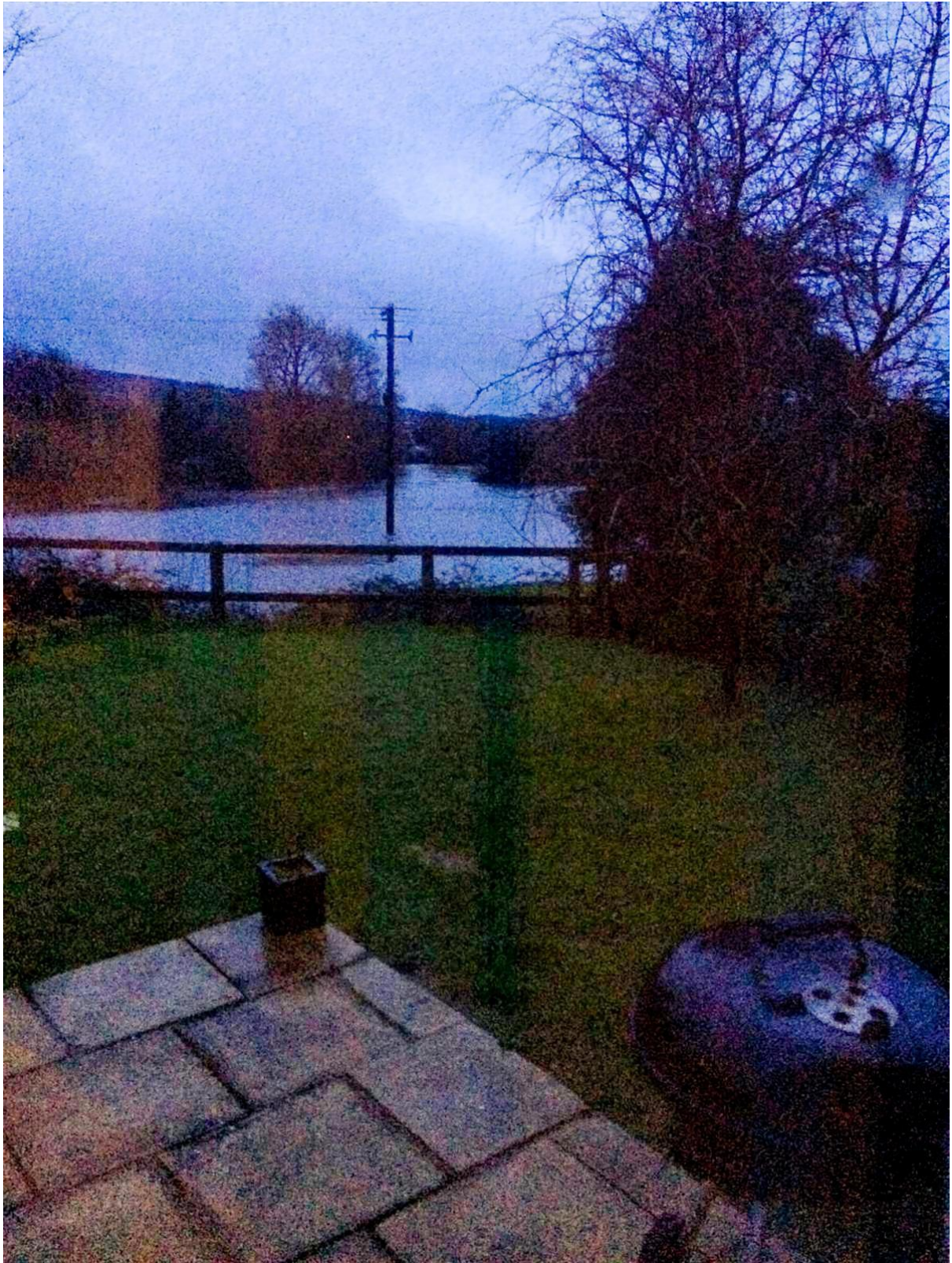


**Plate 9 Flood Extents directly adjacent to Residential Zoned lands at R8**

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Plate 10 Pumps placed by the council end of 2009/start of 2010



**Plate 10 proximity of flood waters to homes in Gort Na Núll in 2010.**