



**Planning Department,
Clare County Council,
New Road,
Ennis,
Co Clare.
V95DXP2**

22nd March 2022

RE: Draft Clare County Development Plan 2023 - 2029

Dear Sir/Madam,

The Office of Public Works (OPW), as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Clare County Development Plan 2022 - 2028. This submission is made specifically with regards to flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines'. Further submissions on the draft Plan may be made by the OPW with regards to the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes the following objectives:

- CDP2.6 Flood Risk Assessment and Management requiring:
 - Development proposals to have regard to the SFRA and Guidelines
 - Flood Risk Assessments to consider impacts of climate change
 - The integration of sustainable water management solutions
 - The inclusion of Natural Water Retention Measures where appropriate
 - Support for the investment in the sustainable development of capital works under the Flood Capital Investment Programme and Flood Risk Management Plans
 - That flood information obtained through development management is used to inform adaptation requirements
- CDP2.7 Coastal Erosion and Flooding supporting measures for management and protection of coastal resources and communities
- CDP2.8 Floods Directive and FRAMs supporting implementation of the EU Floods Directive and implementation of the recommendations of the CFRAM programme

The following comments highlight opportunities for the Draft Plan before it is finalised:

Flood Zone Mapping and the Sequential Approach

The Guidelines highlight the need for a Sequential Approach to managing flood risk, using mapped flood zones alongside considerations of the vulnerability of different types of development to give priority to development in zones of low flood probability. Only if there are no reasonable sites available in zones of low flood probability should consideration be given to development in higher flood probability zones.

The flood zone mapping provided is in the form of 1:50000 scale plan area level coverage, and clips for specific areas in Flood Risk Assessments in the SFRA. It would be beneficial if settlement level flood zone mapping were provided, overlaid on the Land Use Zoning mapping.

It is difficult to assess the zonings/sites at flood risk or if the sequential approach has been applied without the land use zoning maps overlaid with the flood zone maps.

Justification Tests

The OPW welcomes the inclusion of Plan-making Justification Tests supplied in the SFRA for County Clare.

There are a number of proposed land use zonings, some of which are classified as highly vulnerable development in the Guidelines which have been described as being in Flood Zones A and B, for which no commentary has been included to indicate that the Plan Making Justification Test has not been applied and passed. Furthermore, in several cases mitigation measures outlined in the Justification Tests have not been incorporated into the relevant settlement plans. Examples of these are detailed in the Comments on 'Specific Settlements' section below.

If it is the case that sites are already developed Circular PL 2/2014 provides advice and detail to planning authorities on older developed areas of towns and cities located in Flood Zone A and B. *“Where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non- structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced”*.

For sites that are intended to be zoned for development following the application of a Justification Test where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as *Open Space* would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.

National Indicative Fluvial Mapping (NIFM)

The OPW NIFM has been used as a dataset in producing the flood risk mapping. It is stated in Table 4-1: Available flood risk data of the SFRA that these maps are predictive flood maps, it should be noted that these maps are indicative maps.

While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed.

National Coastal Flood Hazard Mapping

It is noted that datasets listed in Table 4-1 which relate to coastal flooding have not included the National Coastal Flood Hazard Mapping. These flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, may be obtained in GIS format from the OPW Flood Risk Management - Data Management Section via email (flood_data@opw.ie).

The Flood Risk Management Plans and Flood Relief Schemes

The OPW welcomes Objective CDP2.10 regarding support for investment in schemes, and ensuring infrastructure provides for adaptation measures to protect against increased flood risk associated with climate change.

The OPW requests that Clare County Council has full regard to the proposed development of flood relief schemes in Ennis South, Springfield, Kilkee, Shannon Town & Environs, Bunratty and Kilrush to ensure 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 Draft Plan.

The OPW has a statutory duty to maintain flood relief schemes completed under the Arterial Drainage Acts, 1945-1995, including the schemes in County Clare. The local authority will also need to maintain any flood relief schemes implemented under its powers. The OPW requests that Clare County Council have full regard to the protection, and the need for maintenance, of these schemes. Clare County Council might also consider including a register of key flood risk infrastructure in the County Development Plan where it would not otherwise be readily identified or protected from interference or removal.

Arterial Drainage Schemes and Drainage Districts

No commentary has been provided on Arterial Drainage Schemes or Drainage Districts. Consideration should be given in zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. 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 location of Arterial Drainage Schemes and Drainage Districts may be viewed on www.floodinfo.ie.

Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

The plan advocates for new and upgraded roads, supported by objective CDP11.11, which will require crossings of watercourses and floodplains. It should be noted that there are

restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945. Highly vulnerable development, including essential infrastructure, is not appropriate in Flood Zone A and B and less vulnerable development, including local transport infrastructure, is not appropriate in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied.

Coastal Change

It should be noted that the Government has established an Inter-Departmental Group on Coastal Change Management to scope out an approach for the development of a national coordinated and integrated strategy to manage the projected impact of coastal change to our coastal communities, economies, heritage, culture and environment. The Inter-Departmental Group is jointly chaired by the Department of Housing, Planning and Local Government and the OPW and will bring forward options and recommendations for the Government to consider as soon as possible.

Mitigation Measures

The Flood Mitigation Measures at Site Design outlined in Section 5.8 of the SFRA are welcomed by the OPW and provide guidance on how residual flood risk can be managed to acceptable levels.

SuDS and Natural Water Retention Measures

The OPW welcomes the commitments in objectives:

- CDP2.6 to integrate sustainable water management solutions, prioritising nature based solutions, and to include natural water retention measures where appropriate
- CDP2.11 to ensure the implementation of SuDS
- CDP2.12 to facilitate and implement green infrastructure developments as a means of managing flood risk
- CDP8.10 to support the sustainable development of native woodlands as a means of enhancing climate and flood mitigation

The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also that the SFRA 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.

CFRAM Update

Objective V3(a)15 in the Ennis Municipal District Settlement Plan supports the facilitation of the CFRAMs for Ennis & Environs “*once complete*”. Also, in section 8 SFRA Review and Monitoring, it is noted that the CFRAM Studies run on a six yearly

cycle. The CFRAM Programme has been completed and implementation of the outputs from this work is underway. The EU Floods Directive requires Member States to review the PFRA, the FRMPs and the flood maps on a six-yearly cycle. As part of the OPW commitment to carry out these reviews, the NIFM Programme has been completed. The OPW continues to update predictive flood mapping to provide the best available flood risk information through the map review programme, where a Flood Map Review Request Form has been submitted to the OPW and the criteria to trigger a review have been met.

Applications for Development in Areas at Risk of Flooding

The OPW welcomes the guidance for all development proposals in Section 5.6 of the SFRA, which is provided in a clear and concise format, in the form of a checklist.

Historic Flood Events

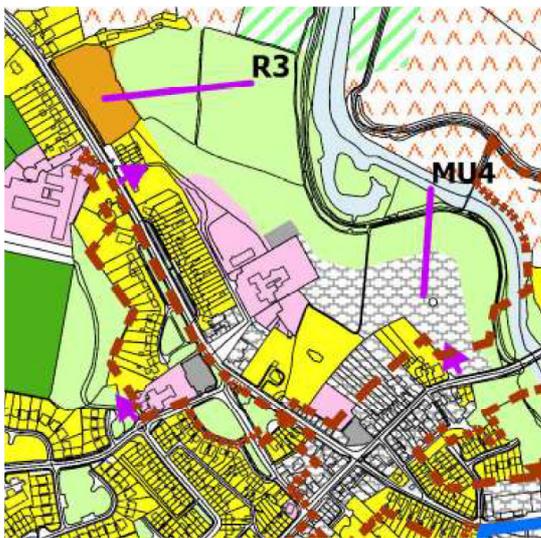
The SFRA references historic flood events from www.floodmaps.ie. Please note that this website is no longer available and historic flood events are now available on www.floodinfo.ie.

Specific Settlements

Clarecastle

The Justification Test for site R37 refers to an area that is not indicated on the land use zoning map. The text states that this is a *Residential* zoning opposite the village school, clarification might be provided as to whether this refers to the area shown as R3 on the land use zoning map. This area is not included in the clipped flood map shown in the Flood Risk Assessment in section 8.3.12. It is stated in this Justification Test that “*There are alternative sites outside Flood Zone A and B where residential development could be accommodated, but they are outside the core and would not result in compact development*”. Prioritisation of compact development over avoidance of flood risk to highly vulnerable development is not consistent with the sequential approach as set out in the Guidelines.

Part three of the Justification Test refers to a flood risk assessment in section 8.3.8. This is a flood risk assessment for MU1, New Road in Ennis. The correct flood risk assessment for this zoning is in section 8.3.12.



*Clarecastle Land Use Zoning Map
Showing New Residential R3*



*Clipped Flood Map for Flood Risk
Assessment 8.3.12*

Ennis

The flood risk assessments in section 8.3, which provide the basis upon which vulnerable zonings in flood zones A and B, such as the sites referenced Op3, Op8, Op9, Op 10, Op 11, Op 12, Op 13, Op 15 and Op 16 have been justified, state that risk can be mitigated via the application of the sequential approach to development management and the setting of finished floor levels. As discussed in the above section on Justification Tests, these mitigation measures might be incorporated into the plan supported by specific policy objectives.

These mitigations have also been proposed for sites Op 6, 7 and 12, however as these sites are wholly in Flood Zone A, the application of the sequential approach to development management would not be appropriate.

Part 2 of the justification test requires that in order for development to be justified in Flood Zone A or B, the site must be within or adjoining the core of a settlement. The justification test for MU6 does not satisfy this requirement.

Sites LDR2 and R17 have failed the Justification Test, but have retained their zoning. The sequential approach to flood risk management as set out in the guidelines recommends that if a zoning which allows for highly vulnerable development in Flood Zone B, or highly or less vulnerable development in Flood Zone A cannot be justified, the zoning should be substituted for a zoning appropriate to the level of risk.

Site Op18 is zoned for commercial use, and is mostly in Flood Zone A, with the remainder of the site in Flood Zone B. No commentary has been included in the SFRA to indicate that a Plan Making Justification Test has been carried out in relation to this zoning. The

commentary on this area in section 8.3.6 of the SFRA states that “*Development within OP18 is likely to involve redevelopment of existing uses. The zoning has been retained to reflect the current, less vulnerable, uses on the site. New or redevelopment will be limited to that which complies with Section 5.28 of the Planning Guidelines.*” This limitation has not been incorporated into the discussion on this zoning in the settlement plan.

Op 6 and Op 15 and TOU1 which allow highly vulnerable development, and COM4 which allows for less vulnerable development have been zoned in flood zones A and B, however no Plan Making Justification Tests have been provided for these zonings. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

Ardnacrusha

It is stated in the SFRA that an unmapped watercourse runs through an area zoned *Existing Residential*, and that “*redevelopment in this area should include a site specific flood risk assessment and apply the sequential approach. Applications for minor development should follow Section 5.28 of the Planning Guidelines*”. While it is noted in the settlement plan that the SFRA makes recommendations in relation to *Existing Residential* zoned lands, it would be beneficial if the at risk area was specified, and the mitigation measures were incorporated into the zoning objective text in the settlement plan.

Ballycannon North

It is stated in the SFRA that there is some encroachment on *Existing Residential* zoned lands, and that “*Applications for minor development in the existing residential areas within Flood Zone C should follow Section 5.28 of the Planning Guidelines*”. Clarification might be provided as to whether this refers to *Existing Residential* zoned lands in Flood Zone A and B, and if so this might be incorporated into the zoning objective text in the settlement plan.

Bunratty

The zoning recommendation in the Justification Test for *Tourism* zoned lands TOU1 states that “*uses should be water compatible*”. The text incorporated into the settlement plan states that “*water compatible uses shall be permitted*”, and specifies specific uses that shall not be permitted. As the tourism zoning would allow for highly vulnerable uses that have not been specified in this text, such as hotel, B&B or hostel, this text might be clarified to match that used as the basis upon which this zoning was justified.

As stated in the Flood Risk Assessment in section 9.2.1 for Bunratty, there is a small portion of the highly vulnerable *Residential* zoned lands R1 within Flood Zone A. No commentary has been included to indicate that a Plan Making Justification Test has been carried out for this zoning. Highly vulnerable development is not appropriate in Flood

Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

The mitigation outlined in the Flood Risk Assessment for these lands states that “*The sequential approach will apply and minor development limited to Section 5.28 of the Planning Guidelines as new less and highly vulnerable development.*” However, this is inconsistent with the mitigation outlined in the settlement plan for this zoning, which states that “*with suitable finished floor levels and consideration of access arrangements, development in this land parcel may be considered*”.

It is noted in the Flood Risk Assessment in section 9.2.1 for *Existing Residential* zoned lands that as the Justification Test has not been passed for these lands, “*The sequential approach will apply and minor development limited to Section 5.28 of the Planning Guidelines as new less and highly vulnerable development.*” It would be beneficial if this were incorporated into zoning objective text in the settlement plan.

Sixmilebridge

As stated in the Flood Risk Assessment in section 9.2.2 for Sixmilebridge, are a number of *Existing Residential* zoned lands which encroach on Flood Zones A and B. The mitigation measures outlined in 9.2.2 which forms the basis upon which this zoning is justified is that “*Development in these areas should be in accordance with Section 5.28 of the Planning Guidelines*”. This is not consistent with the flood risk commentary on this area in the settlement plan, where it is stated that “*if redevelopment of plots takes place, finished floor levels should be used as the primary means of addressing flood management*”.

Bridgetown

Existing Residential zoned lands have been justified on the basis that “*Section 5.28 of the Planning Guidelines applies. No new highly or less vulnerable development within Flood Zones A or B*” It would be beneficial if this were incorporated into zoning objective text in the settlement plan.

Broadford

As stated in 10.2.2 of the SFRA, a Justification Test has been applied and passed to reflect existing land use for lands zoned *Existing Residential*. The mitigation measure which provides the basis upon which these lands are justified is that “*Development within Flood Zones A and B should be according to Section 5.28 of the Planning Guidelines*”. It would be beneficial if this were incorporated into zoning objective text in the settlement plan.

Caher

Table 10-1 states that there is an overlap between *Tourism* zoned lands and Flood Zones. It is stated that “*it is important that permitted uses within the tourism zoning are limited to water compatible*”. It would be beneficial if this were incorporated into zoning objective text in the settlement plan.

Feakle

It is stated in the SFRA that there is “*One industrial zoning within Flood Zone A*”, and that “*Section 5.28 applies to the industrial area within Flood Zone A.*” It is unclear which zoning this refers to, as there are no lands in this settlement zoned *Industrial*.

Killaloe

As noted in Table 10-1 of the SFRA, there are lands zoned for highly vulnerable *Residential* and *Tourism* which can allow highly vulnerable development. There is no commentary included in the SFRA to indicate that Plan Making Justification Tests have been carried out for these zonings. Highly vulnerable development is not appropriate in Flood Zone A or B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Mountshannon

The *Tourism* zoned lands in the holiday village have been justified on the basis that development in Flood Zone A and B “*be in accordance with section 5.28 of the Planning Guidelines*” and that *Existing Residential* zoned lands in Flood Zone A and B, large parts of which appear to be undeveloped, can manage risk through land raising. It would be beneficial if these mitigation measures were incorporated into zoning objective text in the settlement plan.

O’Callaghan’s Mills

As stated above in the Justification Test commentary, circular PL2/2014 sets out that existing land use zoning that may be categorised as highly vulnerable should be assessed, including use of the Justification Test as appropriate. If it is considered that the existing use zoning is still appropriate, the plan must specify the nature and design of structural or non structural flood risk management measures required prior to future development.

Table 10-1 of the SFRA states that a small area of highly vulnerable *Existing Residential* zoned lands is at flood risk, and that this risk can be “*addressed within the development management process and through the use of the sequential approach*”.

No commentary has been provided to indicate that this zoning has been assessed via the Plan Making Justification Test, and the requirement that the sequential approach be applied to development management has not been incorporated into zoning objective text in the settlement plan.

Scarriff/Tuamgraney

Table 10-1 of the SFRA states that lands zoned *Community* and *Industrial* overlap with Flood Zones A and B. It is stated that *Community* zoning is water compatible. It is noted that the plan zoning matrix allows several highly vulnerable uses in *Community* zoned lands, such as childcare, nursing home, or school. There is no commentary included in

the SFRA to indicate that Plan Making Justification Tests have been carried out for these zonings. Highly vulnerable development is not appropriate in Flood Zone A or B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

Ballyvaughan

Table 11-1 of the SFRA states that lands zoned less vulnerable *Commercial*, and highly vulnerable *Existing Residential* have been zoned in Flood Zones A and B. There is no commentary included in the SFRA to indicate that Plan Making Justification Tests have been carried out for these zonings. Highly vulnerable development is not appropriate in Flood Zone A or B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

Ballyea

Table 11-1 of the SFRA states that lands zoned *Community* which allows highly vulnerable development have been zoned in Flood Zone A. Highly vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

Ballynacally

Table 11-1 of the SFRA states that lands zoned less vulnerable *Commercial* and highly vulnerable *Existing Residential* have been zoned in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

Belharbour

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Mixed Use* which allows highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Carrigaholt

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Mixed Use* which allows highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Mitigation measures outlined in the SFRA include that there should be no further development in *Mixed Use* zoned lands in Flood Zones A and B. It would be beneficial if this were incorporated into zoning objective text in the settlement plan.

Cooraclare

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Mixed Use* which allows highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Corofin

Table 11-1 of the SFRA states that lands zoned highly vulnerable *New Residential (R3)*, *Existing Residential* and *Utilities* which can allow highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Cranny

Table 11-1 of the SFRA states that lands zoned less vulnerable *Enterprise* has been zoned in Flood Zones A and B. less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

Creagh

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* has been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Doolin

Table 11-1 of the SFRA states that lands zoned *Tourism* and *Mixed Use* which allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Doonbeg

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* has been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Inagh

Table 11-1 of the SFRA states that lands zoned less vulnerable *Commercial* and *Community* and *Mixed Use* which can allow highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Inch

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* has been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Kilkee

The OPW welcomes the general objective supporting the development of a Flood Protection Plan for the town.

Part 2 of the justification test requires that in order for development to be justified in Flood Zone A or B, the site must be within or adjoining the core of a settlement. As the lands zoned for less vulnerable *Enterprise* ENT3 are located on the periphery of this settlement, they have not satisfied this criterion.

Killadysert

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Community* that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Kilmaley

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Community* that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Kilmihil

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Community* that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones

A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Kilrush

The mitigation measures outlined in 11.2.2 which forms the basis upon which the *Mixed Use* zoning MU1 has been justified state that the sequential approach should be applied along with an SSFRA. It would be beneficial if the requirement for the application of the sequential approach to development management was incorporated into the zoning objective text in the settlement plan.

Knock

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Community* that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Lisdoonvarna

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Tourism* and *Community* that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Lissycasey

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and less vulnerable *Commercial* have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

Moy

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Residential* have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Moyasta

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* and *Tourism* which can allow highly vulnerable usage have been zoned in Flood Zones

A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Querrin

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Quilty

Table 11-1 of the SFRA states that lands zoned highly vulnerable *Existing Residential* have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Ruan

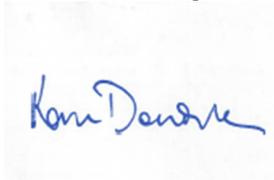
Table 11-1 of the SFRA states that several areas are at risk of flooding within this settlement. As these areas have not been specified, and as flood zone mapping has not been provided at a settlement level, it is difficult to assess whether the zoning approach for this settlement has been consistent with the sequential approach as set out in the Guidelines.

Spanish Point

Table 11-1 of the SFRA states that lands zoned for *Tourism* which can allow highly vulnerable usage have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

If further information or input is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Draft Clare County Development Plan 2023-2029.

Yours sincerely,



PP Conor Galvin
Flood Relief and Risk Management Division