

Chief Executive's Report to the Elected Members

on submissions received on the

Draft Clare County Development Plan **2023–2029**

Part I of IV

10th July 2022

COMHAIRLE CONTAE AN CHLÁIR
CLARE COUNTY COUNCIL

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Section 1 Introduction Purpose and Content

This report forms part of the statutory process for the review of the Clare County Development Plan 2017-2023 (as varied) and the preparation of the new Clare County Development Plan 2023-2029. It is herein submitted to you, the Elected Members on 10th July 2022 in accordance with the requirements of Section 12(4) of the Planning and Development Act, 2000 (as amended), for your consideration.

Section 1.1 Purpose and Content

The Draft Clare County Development Plan 2023-2029 was placed on public display from 10th December 2021 to 28th March 2022. The draft plan consisted of the following;

Volume 1 Written Statement
Volume 2 Maps
Volume 3 Municipal District Written Statement & Settlement Plans
- *3a Ennis Municipal District*
- *3b Shannon Municipal District*
- *3c Killaloe Municipal District*
- *3d West Clare Municipal District*

Volume 4 Record of Protected Structures
Volume 5 Clare Renewable Energy Strategy & SEA
Volume 6 Clare Wind Energy Strategy
Volume 7 Clare Retail Strategy
Volume 8 Clare Housing Strategy
Volume 9 Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary
Volume 10 Environmental Appraisal of the Plan
- *10a Appropriate Assessment – Natura Impact Report*
- *10b(i) Strategic Environmental Assessment – Environmental Report*
- *10b(ii) Strategic Environmental Assessment – Non-Technical Summary*
- *10c Strategic Flood Risk Assessment*

During this public consultation period copies of the plan were submitted to the Elected Members, the Minister for the Housing, Local Government & Heritage, An Bord Pleanála, the prescribed authorities, adjoining local authorities and other statutory bodies in accordance with Section 12(1) of the Planning and Development Act, 2000 (as amended). The Draft Clare County Development Plan 2023-2029 was also made available to the public in hard copy format, in USB format and electronically on the Clare County Council website.

During the public consultation period, every effort was made to engage with members of the public and stakeholders. This was achieved through different mediums including;

- A newspaper notice in the Clare Champion
- 5 separate press releases
- Clare FM coverage
- Clare FM Community Diary announcements during 3 weeks of public consultation events which resulted in 105 announcements over 21 days
- Notifications of the public consultation events in local Parish Newsletters

- Notification to Primary and Secondary Schools across the county
- The making available of an information video on the dedicated development plan webpage on the Clare County Council website.
- A targeted pilot engagement with Scariff Community College
- A total of 37 social media posts across Facebook, Instagram and Twitter
- A series of public walk-in events held across the county as follows

PUBLIC INFORMATION EVENTS	
VENUE	DATE
Lisdoonvarna Pavillion, Lisdoonvarna	Tuesday 25th January 2022
Scouts Hall (beside Ennis Parish Office), Station Road, Ennis	Wedneday 26th January 2022
Clonlara Community Sports & Leisure Centre, Clonlara	Thursday 27th January 2022
Kilkee Community Hall, Kilkee	Tuesday 1st February 2022
Killaloe Hotel & Spa, Killaloe	Wednesday 2nd February 2022
Clarecastle Community Hall, Clarecastle	Thursday 3rd February 2022
Kilmihil Community Hall, Kilmihil	Tuesday 8th February 2022
Tulla Cultural Centre, Tulla	Wednesday 9th February 2022
Newmarket on Fergus Community Hall, Newmarket on Fergus	Thursday 10th February 2022
Enhance Ennistymon: Public Consultation	Monday 28th of February 2022
Sixmilebridge Town First Briefing	Tuesday 1st of February 2022
St Patrick's Day Parade, Ennis	Thursday 17th of March 2022

The making of the development pan must be open, transparent and inclusive, with the public given adequate opportunity to make submissions or observations on the Draft Plan for the consideration of the elected members. I want to sincerely thank all of those who made the 1,015 valid submission through the various mediums including through the on-line submission portal, email, post and at the various consultation events. I also want to thank those who attended the public consultation events that we held across the county. This level of engagement is very encouraging to me in this plan preparation process and displays a huge degree of interest among the public in the future social, economic and cultural development of County Clare.



This Chief Executive's Report is divided into 4 separate parts:

Part I – relates to submissions or observations received on Vol 1 Written Statement of the Draft Clare County Development Plan 2023-2029, submissions received relating to Rights of Way and the associated SEA Environmental Report, Appropriate Assessment Natura Impact Report and Strategic Flood Risk Assessment which form part of the draft plan. Part I of this Chief Executive's Report is subdivided into four sections. Section 1 outlines the introduction, purpose, and content of the Chief Executive's Report. Section 2 discusses the legislative requirements that must be complied with in relation to the preparation of the Draft Development Plan. Section 3 explains the next phase of the process of preparing a new County Development Plan. Section 4 of the Report lists those who made submissions and summarises the matters raised therein.

Part II – relates to submissions received for Ennis and Shannon Municipal Districts

Part III – relates to submissions received for Killaloe and West Clare Municipal Districts

Part IV- relates to submissions received in relation to the proposed Record of Protected Structures.

Section 2 Legislative Requirements

In accordance with Section 12(4)(a) of the Planning and Development Act, 2000 (as amended) I am required to prepare a report on any submissions or observations received during the above referenced period of public consultation and to submit that report to you, the Elected Members of Clare County Council, for your consideration. The report lists and summarises the issues raised in each of the submissions received and gives my response and recommendations in relation to those issues. I have had regard to the nature of the submissions received and the issues raised therein. I have taken account of any directions from the Elected Members arising from the Chief Executive's Report to the Members at 'pre-draft' public consultation stage, the proper planning and sustainable development of the area, the statutory obligations of the planning authority in the area, and all relevant policies and objectives of the Government or of any Minister of the Government in formulating this report.

Under Section 12(5) of the Planning and Development Act, 2000 (as amended), following receipt of this document, you the Elected Members, are required to consider the Draft Development Plan and the Chief Executive's report. Your consideration of these matters must be completed within 15 weeks of the receipt of this report (10th July 2022) in accordance with the Planning and Development Act 2000 (as amended) (allows for 12 weeks) and the Planning and Development (Amendment) (No 3) Act 2021 (where an additional 3 weeks was apportioned).

Following consideration of the Draft Development Plan and this Chief Executive's Report, you the Elected Members can then, by resolution, accept or amend the Draft Clare County Development Plan 2023-2029. I am obliged to inform you that in the making of any amendments to the Draft Plan, Elected Members are restricted to the consideration of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and the relevant policies and objectives of the Government or any Minister of Government.

Section 12(6) of the Planning and Development Act, 2000 (as amended) states that following consideration of the draft plan and this report, where a planning authority, after considering a submission, observation or recommendation from the Minister or the Regional Assembly, decides not to comply with those recommendations, it shall so inform the Minister or the Regional Assembly, as the case may be, as soon as practicable by notice in writing, and the notice shall contain reasons for the decision.

Section 2.1 Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant effects of implementing a plan or programme before a decision is made to adopt the plan or programme. An SEA has been carried out in relation to the Draft Clare County Development Plan in response to the requirements of the EU Directive 2001 on the Assessment of the Effects of Certain

Plans and Programmes on the Environment (Directive 2001/42/EC), which came into effect on July 21st 2004. The enabling statutory instruments (S.I.s) which transpose this Directive into law in Ireland are the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. No. 435 of 204), as amended, and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004), as amended.

In complying with the Directive and associated Regulations, information on the likely significant effects on the environment of implementing the proposed development plan has been prepared in the form of an Environmental Report.

Following the period of consideration of the Draft Development Plan, the SEA Environmental Report and this Chief Executive's Report, should you the Members resolve to make amendments to the Draft Development Plan, and such amendments would constitute a material alteration, the Planning Authority must determine if a Strategic Environmental Assessment is required as respects one or more than one proposed material alteration to the Draft Plan.

Section 2.2 Appropriate Assessment

Appropriate Assessment is the process whereby a plan or project is assessed in view of its potential impact on the conservation objectives of European sites. This includes the preparation of the Draft Clare County Development Plan 2023-2029. A European site is a site protected under the EU Habitats Directive and/or the EU Birds Directive for the species and habitats it supports. The two main types of European Sites are Special Protection Areas (SPAs) which supports birds and wetlands, and Special Areas of Conservation (SACs) which support a range of habitats and species. In general terms they are considered to be of exceptional importance in terms of rare, endangered or vulnerable habitats and species within the European Community.

Under Article 6(3) if the Habitats Directive, an Appropriate Assessment must be undertaken for any plan or programme that is likely to have a significant effect on the conservation objectives of a European site. This includes the preparation of the Draft Clare County Development Plan 2023-2029.

It is a requirement of the Habitats Directive that mitigation measures or measures proposed to avoid impacts on European sites be incorporated into the policy or detail of the Draft Development Plan before finalisation. More importantly, notwithstanding the proposed mitigation measures, if the Draft Development Plan contains or has the potential for significant effects on the conservation objectives of a European Site, it cannot be adopted unless there are imperative reasons of overriding public interest, including those of a social or economic nature and/or reasons of human health and public safety.

Following the period of consideration of the Draft Development Plan, the Appropriate Assessment Natura Impact Report and this Chief Executive's Report, should you the Members resolve to make amendments to the Draft Development Plan, and such amendments would constitute a material

alteration, the Planning Authority must determine if an Appropriate Assessment is required as respects one or more than one proposed material alteration to the Draft Plan.

Section 3 Information on the next stage of the County Development Plan Process

In accordance with Section 12(5) of the Planning and Development Act, 2000 (as amended), following receipt of this report you, the Elected Members must consider the Draft Development Plan and this Chief Executive's Report. Following this period of consideration, where it appears to the Members of Clare County Council that the draft plan should be accepted or amended, you may, by resolution, accept or amend the Draft Clare County Development Plan 2023-2029.

In the event that amendments to the Draft Development Plan are proposed, and such amendments would constitute a material alteration of the Draft Plan, the material alterations and the associated Strategic Environmental Assessment and Appropriate Assessment if deemed necessary, must be available for inspection for a period of no less than 4 weeks, in accordance with Section 12(7) of the Planning and Development Act, 2000 (as amended).

Following that public consultation period, I will again prepare a Chief Executive's Report on any submissions or observations received on the proposed material alterations and submit that report to you, the Elected Members, for your further consideration. Following a period of consideration of that report the Members may then make the plan with or without the proposed alterations or with modifications to the proposed alterations as they consider appropriate. The adopted plan then comes into effect six weeks from the day that it is made.

Section 4 Summaries of Submissions and Observations made and the Chief Executive's Response to the Issues Raised

Submission No: S2 - 014– Office of the Planning Regulator	
Relevant Chapters / Topics	• Core Strategy • General

Summary of Issues Raised in Submission

Recommendation 1 Limerick Shannon Metropolitan Area

Having regard to the Limerick-Shannon Metropolitan Area Strategic Plan forming part of the RSES and in accordance with the requirements of section 9(4) of the *Planning and Development Act 2000* (as amended), the planning authority is required to amend the proposed written statement to:

(i) include a standalone chapter or substantial section addressing the future planning of the Clare part of the Limerick Shannon Metropolitan Area as a distinct spatial planning unit, forming part of the overall Limerick Shannon Metropolitan Area, and to draw together the relevant development issues and policy responses relating to the Metropolitan Area; and

(ii) give appropriate prominence to the LSMA in other parts of the Plan, including the economic and transportation strategies and present it clearly in relevant maps, such as the Core Strategy and settlement strategy maps.

Recommendation 2- Population Targets

Having regard to the provisions of and population targets for the county in the NPF Implementation Roadmap, the RSES (Appendix 1) and in the Limerick Shannon Metropolitan Area Strategic Plan (table 1), and to the provisions of the *Development Plans, Guidelines for Planning Authorities, Draft for Consultation* (August 2021), the planning authority is required to amend the population targets in the Core Strategy including through the:

(i) omission of the population allocation of 3,500 for the as yet undesignated South Clare Economic Strategic Development Zone;

(ii) recalculation of the county population target to align with the 6-year (24 quarters) plan period from Q2 2023 to Q1 2029, based on the NPF Implementation Roadmap allocation; and

(iii) consequential appropriate adjustments to settlement population targets, housing unit allocations and residential land zoning requirements based on the amendments under (i) and (ii).

In accordance with the provisions of section 10(2A)(f) of the *Planning and Development Act 2000*, as amended, and in order to demonstrate consistency with the population targets of the Roadmap and the RSES, the Core Strategy is also required to be amended to state the projected population target for the county, for the individual towns in the hierarchy and, in aggregate (I) for towns and villages >1500, and (II) for the open countryside outside of towns and villages.

Recommendation 3 – Settlement Hierarchy

Having regard to the provisions of NPO 2a, the settlement typology under the RSES (table 3.2 Settlement Typology and RPO 3 refer) the planning authority is required to amend the settlement hierarchy to:

(i) place the LSMA in the top tier of the settlement hierarchy, followed by the key town of Ennis, consistent with the RSES typology, and to identify specifically those areas within the city and suburbs of Limerick;
(ii) arrange the settlements in tiers/levels (service towns, small towns, large villages) generally consistent with the size of the settlement, in addition to the function the settlement performs, unless there is a clear justification consistent with the proper planning and sustainable development for an alternative approach (e.g. specific capacity constraints to growth). In this regard, the Office considers it would be appropriate to designate Scarrif as a Small Town; Killaloe and Newmarket-on-Ferus as Service Towns; and Quinn as a Small Town; and
(iii) review and amend population and housing unit targets and consequential zoning proposals for settlements as appropriate to take account of parts (i) and (ii).
(iv) As there are no changes to (ii) above there are no knock-on changes here.

Recommendation 4 – Distribution of growth

Having regard to NPO 3b, to the growth targets under the NPF Implementation Roadmap, the RSES and the LSMASP, to the requirements of section 10(2A)(f) of the *Planning and Development Act 2000* (as amended), and to the provisions of the *Development Plans, Guidelines for Planning Authorities, Draft for Consultation* (August, 2021), the planning authority is required to amend the Core Strategy to ensure compliance with these targets, detailing :

(i) the total population growth (and associated housing supply targets) for the Limerick Shannon Metropolitan Area (LSMA);
(ii) the proposed share of the population (and associated housing) to the Limerick city and suburbs within County Clare consistent with the targets of the Limerick Shannon Metropolitan Area Strategic Plan (LSMASP) (Table 1 p.286) and a strategy for its delivery; and the growth allocation to the a) un-serviced villages, and b) rural areas within the LSMA.

Recommendation 5- Determination of residential land zoning requirements

Having regard to the provisions under section 10(2A) of the Planning and Development Act 2000, as amended, NPO 3 compact growth, the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) (SRDUAGs) and the Development Plans, Guidelines for Planning Authorities, Draft for Consultation (August, 2021), the planning authority is required to review and revise the determination of land use zoning required under the Core Strategy to:

(i) provide for 50% compact growth within Limerick City and Suburbs;
(ii) apply the density standards set out under the SRDUAGs and in particular to omit the

proposed low density residential development provisions for settlements >5000 population (Limerick City and Suburbs, Ennis and Shannon); and

(iii) include the area of lands zoned for residential use or for a mixture of residential and other uses in accordance with the requirements of section 10(2A)(c) of the Act

Recommendation 6 – Residential land use zoning

Having regard to the provisions under section 10 of the Act, to NPO 3 and RPO 10 compact growth, and to the Development Plans, Guidelines for Planning Authorities, Draft for Consultation (August 2021) the planning authority is required to:

(i) amend the Core Strategy calculations for the determination of 'Housing Land Required' by omitting 'Additional Provision' for the zoning of land except for settlements within the Limerick Shannon Metropolitan Area and within Ennis Key Town;

(ii) define the precise extent of 'Additional Provision' lands proposed to be zoned per settlement under (i), the extent and location of which is to be based on a settlement level justification under section 4.4.3 of the Development Plan Guidelines for Planning Authorities, Draft for Consultation (August 2021) is to be provided;

(iii) where land in excess of that required to meet the implementation of the housing supply target allocation, in combination with any justified 'Additional Provision', as revised in accordance with this recommendation, has been proposed to be zoned in the draft Plan, the planning authority is required to implement one of the mechanisms provided for under s.1.3.5 of Appendix A of the Development Plans, Guidelines for Planning Authorities, Draft for Consultation (August 2021):
- prioritisation / phasing (only where allowed for),
- alternative objectives or
- the discontinuation of objectives
with particular reference to Ennis, Ennistymon/Lahinch, Scarriff/Tuamganey, Kilkee, Tulla, Quin, Crusheen, Doonbeg, and Bunratty; and

(iv) the planning authority is required to omit the zoning objectives for strategic residential reserve or to remove the ability of the land to be considered for development within any part of the plan period.

Recommendation 7 – Killaloe – inclusion of objectives for Ballina

Having regard to Section 9(4) of the Planning and Development Act 2000, as amended, and the status of Killaloe as a joint settlement with Ballina, the planning Authority is required to indicate in the Plan the land use zoning objectives and other relevant objectives of the adjoining planning authority with respect to the settlement of Ballina in conjunction with the proposed objectives for Killaloe.

Recommendation 8 Compact Development

Having regard to the provisions of NPO 3b and NPO 3c and RPO 10 for compact growth and to the

provisions of the Development Plans, Guidelines for Planning Authorities, Draft for Consultation (August 2021), the planning authority is required to amend the Core Strategy table to indicate:

(i) in the Core Strategy table, the amount of land proposed to meet the requirement of national and regional policy to deliver 30% or 50%, as appropriate, of new homes targeted within settlements within the 'existing built-up footprints' as compact growth, including for 'Large Villages'; and

(ii) (ii) on the zoning maps, the lands proposed to be zoned to deliver the 30%/50% compact growth target under item (i) of this recommendation.

Recommendation 9 – Development Management Standards

Having regard to section 10(2)(n) of the Planning and Development Act 2000, as amended, to NOP3, NPO13, and NPO, to RPO10, and RPO151, and to the Sustainable Residential Development for Urban Areas Guidelines for Planning Authorities (2009) and Circular Letter NRUP 02/2021, the planning authority is required to review and amend the development management standards and policy objective of the draft Plan to:

(i) Provide that new residential is required to be compliant with the residential density standards set out in the Sustainable Residential Development for Urban Areas Guidelines for Planning authorities (2009);

(ii) Define parking standards in the draft Plan has a maximum standards;

(iii) Set cycle parking standards;

(iv) include an additional policy objective to provide for ca-free developments for specified development types in appropriate contexts o facilitate urban regeneration, infill/brownfield development and compact growth; and

(v) provide that the road design standards under sections A1.6.1 Cycle Routes, Footpaths and Roads and A1.6.2 Sight distance comply with the Design Manual; for Urban Streets (2019) and the complementary TII publication The Treatment of Transition Zones to Towns and Villages on National Road (TII Publications DN-GEO-03084) within applicable contexts.

Recommendation 10 – Traveller Accommodation

Having regard to the requirements of section 10(2)(i) of the Planning and Development Act 2000, as amended, the planning authority is required to include objectives in the plan for the provision of accommodation for Travellers, and the use of particular areas for that purpose I accordance with the legislative requirements under section 10(2))i) of the Act.

This will include the identification of specific locations in the land use zoning maps for the county, including existing and proposed accommodations.

Observation 1 – Core Strategy Statement

Having regard to the provisions of SPPR DPG 6 of the Development Plans, Guidelines for Planning Authorities, Draft for Consultation (August 2021), the planning authority is requested to amend the draft Plan to include a core strategy statement.

Observation 2 – Rural Housing
Having regard to requirements of NPO19 and to the provisions of the Sustainable rural Housing Guidelines for Planning Authorities (2005), the planning authority is requested to amend policy objective CDP4.14 New Single Housing in the Countryside within Areas of Special Control to provide that in facilitating single houses in those rural areas the planning authority shall have regard to the potential impact of such development on the viability of smaller towns and rural settlements.

Observation 3 – Employment land zoning
Having regard to the requirement to provide clarity, evidence and transparency in accordance with Section 6.2.5 of the *Development Plans, Guidelines for Planning Authorities, Draft for Consultation* (August 2021), the tiered approach to zoning under NPO72, and the provisions of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), the planning authority is requested to:

(i) provide an evidence-based justification for the overall quantity and the spatial location of all employment generating land use zonings;
(ii) consider all relevant infrastructural constraints in applying the tiered approach to zoning;
(iii) consider the necessity to protect the capacity of existing and future national roads; and
(iv) omit any lands which cannot be justified under (i), (ii) and (iii).

Recommendation 11 – Retail Strategy
Having regard to the Retail Planning Guidelines for Planning Authorities (2012), to the provisions for Retail under section 8.7 of the Limerick-Shannon MASP, to LSMASP PO17, and the draft Clare Retail Strategy, the planning authority is required to:

(i) review the proposed Retail Strategy with a view to review and revise the proposed retail hierarch in the Plan in tandem with the review and revise the proposed retail hierarchy in the Plan in tandem with the review of the settlement hierarchy, further to the Recommendation 3 above, to:
    - set Shannon at a higher tier than tier 3, at least to match Ennis, to reflect its role within the Limerick-Shannon Metropolitan Area;
    - set Scarriff at lower tier than tier 3, to reflect the scale of the settlement and its low capacity for retail growth; and
    - set Killaloe at a higher tier, to reflect the scale of the settlement and location, and consider also setting Newmarket-on-Fergus at a higher tier in view of the scale of the settlement.
(ii) Incorporate the proposed additional retail floorspace requirements for higher order settlements outlined in Volume 8 Retail Strategy, into the Written Statement of the Plan; and
(iii) Amend retail objectives for bulky goods comparison shopping for Shannon to ensure that they are consistent with the findings of the Retail Strategy.

Observation 4 – Minerals and quarrying

Having regard to National Policy Objective 23 and the section 28 Quarries and Ancillary Activities Guidelines for Planning Authorities (2004), the planning authority is requested to include a map showing the location of quarries and minerals across County Clare.

Observation 5 – Modal Share and Sustainable Transport

Having regard to the provisions of section 10(2)(n) of the Planning and Development Act 2000, as amended, concerning sustainable settlement and transport strategies, to National Strategic Outcome 5 on sustainable mobility, and to RPO 163, the planning authority is requested, in conjunction with the National Transport Authority (and Transport Infrastructure Ireland), as appropriate, to:

(i) Include existing baseline figures for modal share for the overall county and modal share targets for the plan period. It is recommended that this could best be provided at individual settlement level for the larger settlements, and at aggregate level for rural towns and villages and the open countryside; and

(ii) Provide an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular.

Recommendation 12 – Exceptional Circumstances for Access onto National Roads

Having regard to the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) the planning authority is requested to omit the exemption provided for under section 11.2.9.3 of the draft Plan to allow consideration of access to individual dwellings of existing accesses to National Secondary Roads.

Observation 6 – Limerick Northern Distributor Road

The planning authority is requested to reflect the provisions of the draft Limerick Shannon Metropolitan Area Transport Strategy in the written statement of the draft Plan in respect of strategic land use policy, in coordination with adjoining authorities, along the emerging alignment of the Northern Distributor Road.

Recommendation 13- Flood Risk Management

Having regard to the detailed requirements of the Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEGHLG and OPW 2009), as amended by Circular PL 2/2014, the planning authority is required to:

(i) Revisit the Strategic Flood Risk Assessment and carry out the plan-making justification test for all lands proposed to be zoned to accommodate development vulnerable to flooding within areas at a high or moderate risk of flooding in particular the following:

- Ennis – OP6,OP15,OP18,and TOU1
- Bunratty – R1
- Killaloe – Residential and Tourism
- O'Callaghan's Mills – Existing Residential
- Scarrif/Tuamgraney – Community Zoned Lands

- Ballyaughan – Commercial, Existing Residential
- Bellharbour – Existing Residential, Mixed Use
- Carrigaholt – Existing Residential, Mixed Use
- Cooraclare – Existing Residential, Mixed Use
- Corrofin – New Residential R3, Existing Residential, Utilities
- Cranny – Enterprise
- Creegh – Existing Residential
- Doolin – Tourism, Mixed Use
- Doonbeg – Existing Residential
- Inagh – Commercial, Community, Mixed Use
- Inch – Existing Residential
- Killadysart – Existing Residential
- Kilmihil – Existing Residential, Community
- Knock – Existing Residential, Community
- Lisdoonvarna – Existing Residential, Tourism, Community
- Lissycasey – Commercial, Existing Residential
- Moy – residential
- Moyasta – Existing Residential, Tourism
- Querrin – Existing Residential
- Quilty – Existing Residential
- Spanish Point – Tourism

(ii) Consequent to the above, to not zone for highly vulnerable (Flood Zones A and B) or less vulnerable (Flood Zone A) development, any lands that have not passed the Justification Test;
(iii) Include in the Plan all non-structural and structural (if applicable) flood risk management measures recommended under point 3 of the Justification Test as required to prevent flood risk to vulnerable uses; and
(iv) Overlay the flood risk zone mapping on the land-use zoning objective maps to facilitate the implementation of guidelines, including through the development management process.

The planning authority is advised to consult with the OPW in respect of the above.

Observation 7 – Rights of Way
Having regard to Section 10(2)(o) of the Planning and Development Act 2000, as amended, the planning authority is requested to review the number of rights of way in the draft Plan to more fully reflect the nature and scale of the County.

Observation 8 – Implementation and Monitoring
Having regard to the commitment of the planning authority to securing and monitoring the implementation of the strategies policies and objectives of the draft Plan, the Office advises the planning authority to consider how Chapter 20 Implementation and Monitoring could be amended to ensure that any monitoring is strategic in nature consistent with Part of the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021).

General and procedural matters

- The planning authority would consider revising the zoning objectives to align with the standardized zoning objective in Appendix B of the Guidelines, including defined land-use zoning objective and development priorities for each zoning type.
- Suggest section 5.3.3 to remove reference to the Urban Housing and Regeneration At 2015 and insert reference to the Affordable Housing Act 2021.

Noted, this will be revisited in future plan cycles.

Noted, Section 5.2.3 Social and Affordable Housing will be updated to reflect changes in legislation.

Chief Executive's Response

I would like to thanks the Office of the Planning Regulator for this submission and I would like to respond as follows.

Response to Recommendation 1 Limerick Shannon Metropolitan Area

It is proposed to rename Chapter 4, from 'Urban and Rural Settlement Strategy' to 'Urban and Rural Spatial Strategy'. Within this chapter there is an existing section on the Limerick-Shannon Metropolitan Area, and additional text and maps will be included here as appropriate.

Volume 3b Shannon Municipal District includes all the LSMA settlements except for O'Briensbridge. Volume 3b will be renamed as Shannon Municipal District Settlement Plan & The Limerick Shannon Metropolitan Area Plan. O'Briensbridge will be added to this volume to make it a comprehensive LSMA settlement plan including settlement maps. An additional section will be added to the front of this volume in relation to the LSMA also by way of introduction.

Response to Recommendation 2 Population Targets

- The SDZ figure of 3,500 shall be omitted from the Core Strategy population with a figure of 194 given for the plan period and it made explicitly clear that the 3,500-population figure is a longer-term population. While the proposed South Clare/University of Limerick Economic Strategic Development Zone (SDZ) is yet to be designated it has the potential to be in place to some extent during the lifetime of this Plan. This full 3,500 population is above and beyond the scope of the population allocation in the current plan cycle and is seen as a medium to long term project of regional and national importance. It is deemed appropriate in accordance with the Department of Environment, Heritage and Local Government, Guidance Note on Core Strategies, Section 3, to refer to the potential population yield of such a project, which supports Development Plan Core Strategies to consider later phases of development in SDZs as

part of a strategic land bank. In doing so an explanatory note will be added underneath the Core Strategy Table (Table 3.4) explaining that there is an objective to allocate an additional long-term population target of 3,303 person to the SDZ. The SDZ should also be omitted from the Settlement Hierarchy.

(i) The population figure has been recalculated as a 6 year plan period figure for Q2 2023 to Q1 2029, based on the NPF Implementation Roadmap allocation giving a population figure of 7,231.

(ii) The readjustment as per (ii) above has not had any implication on the housing unit allocation or residential land zoning which is based on the housing supply target. As the HST has not changed, the land zoning has not changed. The population targets for each settlement have been adjusted accordingly.

(iii) A 2029 population target is included in the Core Strategy Table.

Response to Recommendation 3 – Settlement Hierarchy

(i) The settlement hierarchy relates to County Clare and the hierarchy in the Clare context, while it is accepted that the LSMA with a population of 132,420 (CSO, 2016) is of National significance, Limerick City is the main engine of the LSMA, and Clare has a portion of the suburbs (4,521, CSO 2016) which is not significant in the County Clare context. The remainder of the Metropolitan Area (Clare, 22,947, CSO, 2016) include the large settlements of Shannon and Sixmilebridge, both significant urban areas and supported by their rural hinterlands. Notwithstanding the significance/ importance of the Clare portion of the LSMA, Ennis (25,276, CSO 2016) is the main engine of County Clare, the County Town and in the context of the Clare County Development Plan is the top of the settlement hierarchy. It would be non-reflective of the County Clare profile to place the LSMA at the top of the hierarchy.
Notwithstanding this, the Planning Authority fully accepts the relevance of the Metropolitan Area to the wider region and nationally and the CDP supports its development and realisation however it would be a misrepresentative of County Clare to place the LSMA at the top of the Clare hierarchy. It is therefore my view that Ennis with a population of 25,279 (CSO, 2016) remains as the top tier of the County Clare Settlement Hierarchy.

(ii) A narrow focus on the population of settlements does not reflect their function, role and spatial location particularly in a predominantly rural county like Clare. It is accepted that based on population alone, it may appear that there are settlements designated as small towns (Newmarket on Fergus & Killaloe) which should be of a higher order than those designated as service towns. However, the spatial location and function that our service towns perform must also be to the fore in their hierarchy designation. Below is a rational justification based on the proper planning and sustainable development of the County as to why the settlements as per Recommendation 3 are at a particular level within the settlement hierarchy.
Scariff/Tuamgraneys, serves a large rural hinterland serving northeast Clare and south Galway, and is the administration headquarters of the Killaloe Municipal District. It provides both a fire station and HSE ambulance station to service the wider area of east

Clare. Scariff/ Tuamgraney's spatial location is its prime feature as a service town and has a much greater draw/hinterland than that of Killaloe. The rural hinterland of Scariff has a strong demand for rural housing relative to its population which is compromising the achievement of critical mass in the town and the settlement strategy and hierarchy endeavours to make Scarrif a more attractive location to provide an alternative to dispersed rural houses in the countryside. Scariff provides both primary and secondary school facilities and contrary to what population alone suggests provides important facilities for its predominantly rural community.

Killaloe for a significant number of years/plan cycles has been constrained by infrastructure deficiencies being the lack of wastewater capacity and road infrastructure, namely the single carriageway River Shannon bridge crossing and the constraints of the Ballina wastewater treatment plant. There are plans in place for the upgrade of the wastewater treatment plant and also for a new river crossing and bypass of the town. Both of these projects will greatly change for the better the environment and quality of life in Killaloe. However, until this infrastructure is in place, the potential for future growth of the town is constrained and could not at present facilitate growth necessary or reasonable for a Service Town. The appropriate designation of settlements within the hierarchy will be revisited in the next Plan cycle.

Newmarket on Fergus is located less than 15km to Ennis and 7km to Shannon. The Key town of Ennis and the Metropolitan Town of Shannon are identified for significant population growth and the designation of Newmarket on Fergus as a service town with associated population growth would compromise the achievement of population growth in higher order settlements mentioned particularly Shannon. Furthermore, Newmarket on Fergus relies heavily on Shannon in terms of employment and is not a self-sustained town in terms of employment opportunities. Again, having regard to its spatial location close to higher order settlements it would not service the same extent of the rural hinterland that other service towns do. Newmarket on Fergus does not have the same range of services expected of a service town by way of example it has no secondary school.
It is imperative Newmarket on Fergus grows at a rate that does not detract from Ennis and Shannon.

Quin is located circa 10km from Ennis, and it is its location relative to Ennis that has made it an attractive location rather than the services or facilities available within the settlement itself. The village provides a reasonable range of services and facilities to their resident population but not to an extent that could be considered a 'town', and it is largely a commuter settlement to Ennis and Shannon.
Similar to Newmarket on Fergus it is imperative that the growth of Quin is managed at a rate that does not detract from Ennis and Shannon.

Having regard to the above I am not in favour of any amendments to the settlement hierarchy arising from this submission and that a narrow focus on the population of settlements alone does not reflect their function, role and spatial location particularly in a predominantly rural county like Clare.

(iii) As there are no changes to(ii) above there are no knock-on changes here.

Recommendation 4 – Distribution of growth

That portion of the Limerick suburbs in Clare (Athlunkard & Parteen) at present do not facilitate the growth envisaged by the RSES given the boundary alignment, along with the natural boundaries present such as the River Shannon, and the Ardnacrusha Headrace, Parteen Bridge, and flood zones and in the absence of the delivery of the LNDR it would be premature to zone lands to the extent envisaged by the RSES due to capacity constraints. However it is hoped that this can be achieved in future plan cycles once such fundamental issues are resolved. This situation is confirmed by the preliminary census figures (CSO June 2022) which shows poor and stifled growth in the Limerick Suburbs (within Clare) and settlements in that vicinity even though a significant amount of land was zoned.
Furthermore, through this consultation process a significant number of submissions on the Draft Plan were received from Athlunkard residents/community outlining existing deficiencies in their area and in particular the traffic gridlock due to geographical constraints outlined above. The Draft Plan has sought to zone adequate lands in the Limerick suburbs relative to the very real constraints in the area which are not only restricting future growth but also impacting quality of life for existing residents.
The remainder of the Metropolitan Area also has a number of villages which do not have any wastewater infrastructure, most notably Ardnacrusha whose location relative to Limerick City makes it an attractive location, yet its growth is constrained by both wastewater and geographical constraints as highlighted above.
In the interest of proper planning and sustainable development the Metropolitan Area is not capable based on infrastructure deficiencies at present to cater for any more growth than that which it has been assigned in the Core Strategy. Should these deficiencies be addressed in the future, subsequent plan cycles will then address the achievement of the population targets as set out in the NPF Implementation Roadmap, the RSES and the LSMASP

Recommendation 5- Determination of residential land zoning requirements

(i) Limerick suburbs within Clare consists of Athlunkard and Parteen. It is accepted that NPO3b states
"*Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements"*
It is explained in the appendix note 17 that "this means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO in line with criteria i.e. having a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 meters, and where there is evidence of an urban centre (shop, school etc).

In the case of Athlunkard, the settlement is completely within the CSO boundary (black Line) and thus any new development by the definition would be considered within the built-up footprint. However, the lands zoned to meet the Core Strategy are in fact greenfield land and on the edge of the settlement, there are no opportunities for brownfield or infill development in Athlunkard as it is quite a high-density settlement with much of the developments delivered over the last 20 years. Therefore, the Core Strategy gave a figure of zero for compact growth having regard to the nature of the

settlement. If this was to change to be in accordance with the definition, then the entire allocation would be reflected as compact growth and a zero figure given for greenfield. Having regard to the characteristics of the settlement it is deemed the best approach to express the allocation greenfield rather than compact growth as the actual development on the ground will occur on greenfield land.



(ii) The lower density element has been removed from the calculation of residential land provision for Athlunkard. As detailed earlier in the submission, Athlunkard has severe infrastructure constraints, and the maximum appropriate land has been zoned at this location. Parteen while within the suburbs retains a very rural character and again is constrained by Parteen Bridge with a single lane traffic system. Until such time as the infrastructure constraints are resolved, Parteen village is not capable of providing for very high density development and the higher and lower density assumption has been retained here having regard to the nature of the settlement as a traditional village rather than just purely its location within the Limerick Suburbs.

While the settlement status of Ennis and Shannon are acknowledged it is deemed unreasonable to use a broad-brush approach to the realization of the critical mass of these settlements which fall within the larger town category between 5,000 and 50,000, Shannon has population of circa 10,000 and Ennis less than 30,000. In a rural County such as Clare the constant demand for one off rural housing is intense and the ability to provide for a lower density option in Ennis and Shannon is intended to provide a real alternative to the pressure for one – off rural housing. Similarly, it would be contrary to proper planning and sustainable development to decide that because a town is greater than 5,000 population it is treated the same as a town of 45,000 because they fall within the same category as set out in the guidelines. A main

feature lacking in Shannon is good quality, low density housing and such an absence has stalled the development of population growth in Shannon and will continue to do so into the future if this cannot be provided for. Not only has this affected Shannon itself it has had a massive impact on the rural hinterland and locations like the un-serviced village of Cratloe, whereby these unserviced areas have traditionally provided this lower density type of accommodation needed for Shannon Town. Notwithstanding the need for land efficiency in our towns, climate action is to the fore of this plan and the need to promote a modal shift to more sustainable transport options. Therefore, it is preferable to be able to attract those who would otherwise live in unserviced rural areas and commute purely on the basis of housing type than have a high-density town with large commuter numbers into it. Therefore, the Core Strategy and the zoning maps have maintained a level of low density.

(iii) Noted.

Recommendation 6 – Residential land use zoning

(i) The Core Strategy now includes "Additional Provision" as per Section 4.4.3 of the Development Plan Guidelines, 2022. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing through inactivity on a particular landholding or site. Therefore, the use of the additional provision mechanism increases the probability of achievement of the housing supply targets in the first instance.
It is noted that the submission suggests that the use of Additional Provision is only permissible within the Limerick Shannon Metropolitan Area and within the key town of Ennis. This is considered unreasonable and unmerited. The Development Plan Guidelines do not restrict the settlement tiers to which "Additional Provision" can applied but says "The extent of any Additional Provision must be comprehensively identified, quantified and explained in the core strategy and shall not exceed 20-25%of the required quantum of zoned land and sites in settlement in any planning authority area as a whole, for any six-year plan period."

(ii) Additional Provision has been added across the County and its exact locations identified in the Core Strategy table. It has been primarily used in Ennis and the Metropolitan area and then in areas where housing demand is highest and where adequate services are available to support it. It has also been used in some smaller scale settlements where the level of land provision is so small it may only be one parcel of land, and if that parcel does not come forward no growth can happen, therefore it is explicitly needed in these locations to increase the probability that some growth will occur.

Finally, I see this CDP cycle as a transitional one from a situation of extensive zoning across the county to a massively reduced amount, and the additional provision is needed to cushion this transition. In fact, in excess of 700ha of land has been dezoned in the Draft Plan with almost 400ha of that being in serviced settlements. Therefore, additional provision of 25% is essential for this plan and to ensure that the housing supply target is actually achievable having regard to lands that may not come forward in the Plan cycle.

(iii) County Clare is in a unique position nationally, in terms of the number of Ukrainian Refugees it has become home to as part of the Humanitarian Response to Persons Arriving in Ireland fleeing the Conflict in Ukraine. At the time of writing there are 2,487 Ukrainians in emergency accommodation in County Clare and it is believed that there is an additional 1,000 in private accommodation across the County. Therefore, at present Ukrainian refugees amount to circa 3% of the Clare population (CSO, 2022). In addition, the preliminary CSO 2022 County Clare population of 127,419 has outstripped the NPF target. The HST methodology is acknowledged, and it is respected that the ESRI work provided a consistent national methodology for translating the population set out in the NPF and the RSES into projected demand for new households. As stated in the submission (page 15) *the HST Guidelines methodology takes accounts of all projected housing supply, social and private*" however it has not taken account of the Ukrainian crisis. In the County Clare case the HST (4,500 units) derived by the HST methodology is not reflective of the unprecedented reality we are now dealing with when faced with the reality of meeting the housing needs of a large number of Ukrainian migrants. It is acknowledged that not all Ukrainians will remain in the county/Country, but it is expected a large number will especially in the medium term. This housing need has not been considered in any of the policy documents or methodologies which produce both the population and housing supply target for County Clare. Yet, the Council has been instructed by Minister Darragh O'Brien, letter dated 1st of April 2022 to identify *"sites that may be suitable for the immediate development of temporary or permanent housing, and which has not already been earmarked for social and affordable housing under Housing for All"* to cater for this unique need.

As a result of the unprecedented issues outlined above and in the knowledge that this housing demand is over and above what the NPF, RSES and HST methodology has catered for, the Council has had no choice but to add additional "unmet" housing units and population to the Core Strategy. This is done in the first instance to be able to provide sites as requested by the Minister for this specific need, but also to protect the original planned growth (4,500 units & 7,213 people) such that land/houses will be available to meet the domestic and refugee need over the Plan period. The Local Authority see no other way to address this scenario but to add an unmet demand to the Core Strategy.

The location and extent of this "unmet" need/demand will be identified in the Core Strategy and the subsequent land equivalent in hectares. The unmet need caters for an additional 2,000 people (currently 3,500 Ukrainians in the county) and 1,260 units. Having regard to the Government's intention to end the Direct Provision system by 2024, and the enhanced role local authorities and AHBs will play in that new system, it was deemed most appropriate to distribute the unmet Ukrainian need by location relative to the unmet social housing need based on details provided by our housing department.

In relation to Ennis, Tulla, Quin, Crusheen, and Bunratty the residential zoned land figure identified in the Core Strategy includes extant permission. Thus, the zoned land

figure appears high, but the reality is this relates to extant permissions accounted for in the HST Methodology as completions prior to the coming into effect of the Plan. Therefore, it is not impacting on the HST figure for the 6 year plan cycle.

(iv) Strategic Residential Reserve lands shall be identified across serviced settlements to facilitate longer term growth needs across the county. These lands comprise infill or contiguous sites or in some cases there is an on-site planning history of residential use. These lands are considered as the most appropriate sites for the long-term sequential expansion of the relevant settlement. These Strategic Residential Reserve lands in general, will not be brought forward for development within this plan period, except where the Planning Authority is satisfied that the development of residential zoned land is progressing faster than expected and a shortage of available lands may arise or residential zoned land is not being brough forward as expected and a shortage may arise during the plan period.

The development of such lands will only be considered from the beginning of year four of the Plan (April 2027) in order to give an opportunity for zoned land to be brought forward for development. Development proposals will only be favourably considered where it can be clearly demonstrated to the satisfaction of the planning authority that a 'Residential' zoned parcel of land in the same settlement will not be brought forward for development due to infrastructural or other demonstrable constraints during the remaining period of the Plan. It is important that these lands continue to be identified as part of the longer -term residential land supply to bring some certainty to the development process. Therefore, I am not in favour of omitting the Strategic Residential Reserve.

Recommendation 7 – Killaloe – inclusion of objectives for Ballina

Noted, Section 9(4) of the Planning and Development Act 2000, as amended requires the Planning Authority to have regard to development plans of adjoining planning authorities and to co-ordinate the objectives in the development plan with those of authorities except where it is inappropriate to do so. Tipperary and Clare County Council have jointly prepared a Killaloe-Ballina Town Enhancement & Mobility Plan which is referred to in Volume 3c to provide for the coordinated growth of the linked settlements. The preparation of the Clare County Development Plan has had regard to the Development Plans of adjoining local authorities as per the legislation. It is not deemed appropriate to include in the Plan the land use zoning objectives and other relevant objectives with respect to Ballina as it is outside the jurisdiction of this plan and may be subject to change and thereafter would be misleading. A more appropriate approach is to include a map in Volume 3c Killaloe that shows an indicative outline of the Ballina Settlement Plan for reference.

Response to Recommendation 8 Compact Development

(i) The Core Strategy Table has been amended to identify the quantum of land associated with delivering 30% or 50%, as appropriate, of new homes targeted within settlements within the 'existing built-up footprints' as compact growth. In relation to Large Villages

the area of land to be zoned in the first instance is very small and these sites are identified within the existing built up footprint by definition yet are largely greenfield sites. Furthermore, the NPF Implementation Roadmap states that all Development Plan Core Strategies must balance the requirement for different types of housing provision by location, to include the zoning of land where applicable, from:

i. Cities and their suburbs, to
ii. large towns,
iii. small towns,
iv. settlements of 1,500 people or fewer, and
v. the countryside generally.

Where certain urban local authority areas include all of these five categories of housing location, at least three of these settlement types (i.e. i, ii and iii) must also include specific consideration of infill/brownfield and greenfield capacity.

Given that the Clare Core Strategy includes categories i, ii. iii, and settlements below 1,500 it is considered appropriate not to identify specific compact growth figures for the smallest order settlements as essentially all growth is compact growth.

(ii) All land earmarked to achieve compact growth are within mixed use zonings in and contiguous to the town centers. Residential lands are greenfield in nature sequential to the mixed use lands, however many of these also fall into compact growth by definition but are accounted for in the greenfield category.

Having regard to the concept of compact growth it is felt this should be given a stronger emphasis in the Plan. Chapter 4, Section 4.2 Settlement Strategy shall be updated with a new section on Compact Growth.

Response to Recommendation 9 Development management standards

(i) The wording of A1.4.2 Urban Residential Development, Multiple Residential Unit Development will be altered to include compliant with the residential density standards set out in the Sustainable Residential Development for Urban Areas Guidelines for Planning Authorities (2009);

(ii) This amendment has been made at Note 5 to Table A3 – Bicycle and Vehicle Parking Standards in Volume 1 Appendix 1 'Development Management Guidelines – Parking Standards' on foot of the submission received from the NTA.

(iii) Comprehensive Cycle parking standards are set out at Table A3 – Bicycle and Vehicle Parking Standards in Volume 1 Appendix 1 'Development Management Guidelines – Parking Standards'.

(iv) Note 12 to Table A3 – Bicycle and Vehicle Parking Standards in Volume 1 Appendix 1 'Development Management Guidelines – Parking Standards' provides that "Applicants may propose an alternative parking arrangement to the standards as set out in the parking standards set out in Table A3 for the agreement of the Planning Authority. I consider that this would allow adequate flexibility within Development Management, i.e. the preparation and assessment of planning applications, for car-free developments to be proposed.

(v) The Council is satisfied that the road design standards under sections A1.6.1 Cycle Routes,

Footpaths and Roads and A1.6.2 Sight Distance comply with the appropriate publications, including DMURS and TII Publications. On foot of a submission from TII, the Council intends to amend CDP11.18 which will provide enhanced policy support for DMURS and the TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads'

Response to Recommendation 10 – Traveller Accommodation

In recognition of the specific requirements to provide accommodation for the Traveller community and the responsibility of the local authority for the provision of accommodation, including serviced sites, the Council has a current Traveller Accommodation Programme (TAP) 2019-2024 and it is an objective (CDP5.10) to provide appropriate housing in accordance with the TAP. The current TAP does not have a spatial element to inform any inclusion on the land-use zoning maps of the draft plan and it is not the intention of the Planning Authority to identify sites until such time as a spatial element is included in a future TAP which will then be incorporated into the Development Plan as considered appropriate at that time.

Response to Observation 1 – Core Strategy Statement

A core strategy statement will be prepared

Response to Observation 2 – Rural Housing

The Council recognise the importance of retaining population and supporting the rural economy, while seeking to consolidate the existing rural town and village network and this is reflected within Chapter 4 of the draft Plan. However, in the absence of guidance on what constitutes 'potential impact' it is considered inappropriate to include in policy at this time.

Response to Observation 3 – Employment land zoning

The zoning of employment generating lands have been prepared having regard to NPO 72, infrastructural constraints , and regard to the demand for such lands at a settlement level.

It is noted that since the preparation of the Draft Plan the Regional Enterprise Plan to 2024 for the Mid-West has been published and the Draft Plan will be updated to take account of same.

Recommendation 11 – Retail Strategy

(i) As per the justification in Response 3, the settlement hierarchy/order is not proposed to change and subsequently there are no adjustments arising from (i). Notwithstanding the designation of Shannon as a metropolitan town, at present its retail offering is far less than Ennis. It would be completely unreflective of its present role to place Shannon at the same tier as Ennis.

(ii) Include Table 6.23 Final Future Retail Floor space Potential (Cumulative- Adjusted for Vacancy & Pipeline in Chapter 7 Retail after table 7.2.

(iii) As noted, a bulky goods floorspace requirement does present for Shannon by 2029. However, this is modest in comparison to Ennis. While there is technically no conflict as a result in how section 7.5.2 correctly identifies that there is indeed a need of 'varying scales' in these locations, it is recognised that an improper implication may be drawn that new retail warehousing development of a significant scale may be required equally between Ennis and Shannon, given how both are described alongside one

another. Consideration has therefore been given to clarifying this matter through an amendment of relevant text.

Response to Observation 4 – Minerals and quarrying

The Draft Plan recognises the important role that the extractive industry has in the economy of the county and in this regard, policies and objectives have been included in Section 8.3.6 Extractive Industry, Chapter 8, Volume 1 of the Draft Plan which support the industry while having regard to protecting residential amenity and the receiving environment. Given the limited level of detail that could be conveyed and difficulties in accurately reflecting the most up to date extents of any quarry, it is considered that there is little merit in including a map to show the location of quarries and minerals in the county.

Response to Observation 5 – Modal Share and Sustainable Transport

The Draft CDP sets out a policy emphasis towards compact growth and consolidating towns and villages in line with national and regional policy. The Strategic Environmental Assessment (SEA) at Volume 10 (b) (i) includes the following Strategic Environmental Objectives to address Climate Change:

- CC1 – Reduce the need to travel/increase use of public transportation and achieve modal shift in transport across the county;
- CC2 – Decrease the usage of fossil fuels and increase both renewable resource usage and protection together with a move towards more low carbon energy sources.

Objectives CC1 and CC2, in combination, are given effect in the Development Plan in Chapter 2 Climate Action, under Objective CDP2.15, which reads as follows:

CDP 2.15 Development Plan Objective: Renewable Transport

It is an objective of Clare County Council:

a) To seek initiatives that will achieve the decarbonisation of the transport sector, moving to the use of clean generated electricity bio-gas hydrogen and other non-fossil fuels for private and public transportation and the provision of clean energy and low carbon fuelling stations by 2030;

b) To reduce reliance on private cars and achieve modal shift to sustainable transportation in conjunction with policies to achieve compact growth and reduce congestion;

c) To seek the development of clean energy and lower carbon fuelling and electric vehicle charging stations and infrastructure at appropriate locations in the County which take into consideration electric, hydrogen, CNG/biogas inter-alia; and

d) To support actions to transition the movement of freight, ports and airports to a low carbon future.

Appendix 9 to Volume 1 sets out the Implementation and Monitoring Framework of the draft Development Plan. It sets out the Key Performance Indicator (KPI) / Data Source for monitoring and evaluating each objective.

For Objective 2.15 'Renewable Transport' the KPIs are:

- No. of people walking/using public transport /other sustainable modes of travel i.e. changes of baseline data;
- No. of planning applications for larger developments that include EV points;
- No. of EV points included on CCC owned properties including public car parks.

The Planning Authority acknowledge the value in requesting specific targets to measure or analyse the achievement of this modal shift. This has been requested in a number of submissions on the draft CDP, including this one. In response to those submissions, I consider that the appropriate location within the CDP to address modal shift in transport is at Section 11.2.2 'Integrated Land Use and Transport Planning'. Baseline mode share figures will be included there.

In relation to the setting of mode share targets and targets regarding modal shift to non-car travel, I consider that the appropriate target is to achieve a modal shift to sustainable transportation (as expressed in CDP2.15 (b), i.e. that the share of travel by non-car modes would increase and not decrease.

I do not consider that it is worthwhile at present for the Council to set specific numerical targets. It is appropriate to target solely that the share of travel by non-car modes would increase from the baseline. The baseline data from POWSCAR (Census 2016) shows that non-car trips account for a range between 20%-32% across the 5 settlements at the top of the settlement hierarchy - Ennis (Key Town) Shannon (Metropolitan Town) and the Service Towns of Scarriff / Tuamgraney, Shannon and Kilrush. This shows the dominance of car-based trips to work or school originating within those settlements. The non-car mode share outside of those settlements is likely to be even lower. I consider that Co. Clare is at the beginning of a critical phase wherein the shift to sustainable travel modes will be facilitated to a much greater extent than it has in the past. This is due to enhanced policy support in the draft CDP for:

- Consolidation of development into town and village centres in accordance with the 10-minute town concept;
- Compact Growth of settlements;
- Improvement of permeability for walking and cycling in existing developed areas;
- Support for behavioural change regarding active travel;
- Mobility Management at organisational level.

It is also due to improvements in the provision of transport infrastructure and services locally in the following manner:

- Enhancement of road and footpath networks within settlements under the Active Travel Programme investment;
- Enhancement of TFI Local Link Limerick Clare Bus Services;
- Enhancement of bus services through Connecting Ireland and Limerick BusConnects;
- Implementation of measures within draft LSMATS.

I consider that once the relevant results of the 2022 Census and the subsequent 2026 Census are compared to the 2016 Baseline that will be included in the CDP Plan for 2023-2029, the preparation of the next CDP commencing in 2027 will be better placed to set mode share targets for the duration of the next CDP.

Additionally, I consider that the following Objectives and requirements (among others) within the CDP provide a sufficient basis for modal shift, without the need to set out specific targets for each mode:

- Objective CDP 2.15 on Renewable Transport;

- Objective CDP 6.13 relating to High Quality Development and the provision of travel and mobility solutions;
- Objective CDP10.16 ' Primary and Secondary Education'(as revised in response to NTA submission S2/625);
- Objective CDP 11.2 relating to Transport Planning (as revised in response to NTA submission S2/625);
- Objective CDP 11.3 relating to LSMATS and Transport Planning;
- Objective CDP 11.5 relating to Walking and Cycling;
- CDP 11.6 relating to the rail network;
- CDP 11.8 'Bus Transport';
- CDP 11.19 Shannon International Airport;
- The Development Management Guidelines which specifically set out the requirements for new developments (residential and others).

Response to Recommendation 12 – Exceptional Circumstances for Access onto National Roads

Noted, this is addressed in the TII submission S2-002, please see response and recommendation to same.

Observation 6 – Limerick Northern Distributor Road

I note the text referred to in the submission, concerning the LNDR and included on page 75 of the draft LSMATS. However, I have also consulted the Revised Draft LSMATS which was subject to public consultation from April to June of 2022. The text referenced in your submission concerning the LNDR is no longer contained in the Revised Draft LSMATS.

Within the draft CDP, the LNDR is identified as a Relief/Distributor Road at Section 11.2.9.5, with the following text included at that section:
No new residential access points shall be permitted on the route of the proposed Limerick Northern Distributor Road and the Killaloe Bypass when constructed.

Objective CDP11.15 of the draft CDP 'Proposed Projects identified for Future Development' includes the following sub objective:

> *To ensure that the design of the proposed Limerick Northern Distributor Road, as it intersects the R464 in Parteen, is included within an overall Masterplan for the village and provides for safe and adequate means of pedestrian and vehicular access and connectivity east and westwards within Parteen and across the route at this point;*

I consider that the extracts from the draft CDP shown above provide some policy support for the protection of the strategic nature of the future LNDR. However, I do not intend to propose additions or changes to the policy based on this submission, noting that the text referred to in the submission has been superseded in the Revised Draft of LSMATS.

Response to Recommendation 13- Flood Risk Management

The SFRA has been reviewed and updated accordingly and adjustments made to zoning as required please see detailed response to OPW submission S2-007, and the recommendations arising from same.

Flood risk mapping is shown on Volume II maps, where it is deemed appropriate.

Response to Observation 7 – Rights of Way
The Planning Authority is cognisant of the requirements of the 2010 Planning and Development (Amendment) Act Sec 7(b)(ii)(o) which states that:
The preservation of public rights of way which give access to mountains, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating theirlocation on a list appended to the development plan.
Clare County Council have reviewed the number and nature of rights of way included in the Draft Plan. I am satisfied that the content of same is reflective of the rights of way in County Clare.

Response to Observation 8 – Implementation and Monitoring
Implementation and Monitoring as set out in Appendix 9 has been amended to ensure it is strategic and achievable.

General and procedural matters
Noted, this will be revisited in future plan cycles.

Noted, Section 5.2.3 Social and Affordable Housing will be updated to reflect changes in legislation.

Chief Executive's Recommendation

Recommendation 1

1. Change the name of Chapter 4 to Urban and Rural Spatial Strategy
2. Insert text into Section 4.2.2 Settlement Hierarchy and Strategy under the Limerick-Shannon Metropolitan Area as below

Limerick-Shannon Metropolitan Area
The Limerick-Shannon Metropolitan Area includes Limerick City Centre at the core and the continuous built up area of Limerick City and Suburbs (as defined by the Central Statistics Office). Shannon in County Clare is the largest metropolitan town with a population of 9,729.

The Limerick-Shannon Metropolitan Area Strategic Plan (MASP) area which is almost evenly split between Limerick and Clare (with 49% located in Co. Clare), includes the following settlements in County Clare:

- Ardnacrusha;
- Ballycannon North;
- Bunratty;
- Clonlara;
- Cratloe;
- O'Briensbridge; and
- Sixmilebridge.
- Shannon

The overall population of the MASP as of the 2016 census was 132,420 with 27,468 in County Clare and the remainder in Limerick City and suburbs. The Regional Policy Objectives as set out in the RSES have informed the objectives of the Development Plan for the MASP areas and the future development of the MASP area is a cross cutting theme of the Development Plan.

Development Strategy
The policies of this Development Plan support the delivery of key growth for the Limerick Shannon Metropolitan Area in the NPF, RSES and MASP, having regard to the constraints in place particularly in the Limerick suburbs area of Clare in relation to wastewater, and road infrastructure.

In order to achieve appropriate growth in the area the Core Strategy identifies a population growth target of 2,279 people and 1,406 housing units for the plan period. It is acknowledged that the population figure is slightly under that set out in the RSES, however the Limerick Suburbs area is currently constrained by lack of wastewater treatment in Ardnacrusha, the lack of commitment on the LNDR and severe traffic congestion in Athlunkard, and also by the need to maintain the identity of Parteen as a separate neighbourhood from Athlunkard. The population and housing location given to the Limerick suburbs is deemed the maximum possible allocation given the constrains in place for this plan period. The population allocation will be reviewed in future plan cycles.

The emphasis for the development of the Metropolitan area is on compact growth which requires the provision of higher densities and mixed-use developments in urban settlements, in order to ensure a sufficient use of scarce lands and optimise public investment in infrastructure. This requires the integration of land use and transportation planning and the intensification of use of existing underutilised land and consolidation of the built environment through the development of brownfield and infill lands, as well as the reuse of vacant and derelict properties.

To support the economic growth of the Metropolitan Area, Clare County Council in partnership with University of Limerick are currently seeking designation of University of Limerick – Clare Campus lands as a Strategic Development Zone. The scale of the site at 110 hectares and its integrity as an entity dictates that the site is best master -planned and developed in a plan-led manner as an SDZ. In addition, Shannon is an established centre of both foreign direct investment and indigenous enterprise. The Shannon Free Zone, Smithtown and Westpark Business Campus accommodate companies that make significant contribution to the local and national economy each year. Following adoption of the Clare County Development Plan, a Shannon Town and Environs Local Area Plan will be prepared which will protect and promote Shannon as an attractive location for industrial/enterprise development. Further details and policy support for these locations as employment generators and critical to the realisation of the vision to the MASP can be found in Chapter 6 Economic Development and Enterprise. The Joint Retail Strategy for the Metropolitan Area creates the appropriate conditions necessary to foster a healthy and vibrant retail environment, enhancing the vitality of urban areas and effectively managing and supporting change.

The Draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) is a cross-county Metropolitan scale document which sets out the policies and objectives of the National

Transport Authority, Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland at a level appropriate to that scale. The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the Limerick Shannon Metropolitan Area (LSMA). LSMATS will enhance active and public modes of transport and provide opportunities to improve health and wellbeing, reducing carbon emissions and traffic congestions.

Figure 4.2 Limerick-Shannon Metropolitan Area in County Clare



3. **Amend Heading 6.7 Economic Development in Shannon to 6.7 Economic Development In the Limerick-Shannon Metropolitan Area.**
4. **Reorganise Section 6.8 Education, the Knowledge Economy amd Access to talent to come before Section 6.10 Shannon Estuary**
5. **Insert the following into text into Volume 3b**

Limerick Shannon Metropolitan Area

The Limerick-Shannon Metropolitan Area Strategic Plan (MASP) area which is almost evenly split between Limerick and Clare (with 49% located in Co. Clare), includes the following settlements in County Clare:

- Ardnacrusha;
- Ballycannon North;

- Bunratty;
- Clonlara;
- Cratloe;
- O'Briensbridge;
- Sixmilebridge.
- Shannon

The overall population of the MASP as of the 2016 census was 132,420 with 27,468 in County Clare and the remainder in Limerick City and suburbs. The Regional Policy Objectives as set out in the RSES have informed the objectives of the Development Plan for the MASP areas and the future development of the MASP area is a cross cutting theme of the Development Plan.

This document sets out the settlement strategies and settlement plans for all settlements in the Metropolitan Area. Reference should be made to Volume 1 Written Statement of this Plan in particular Section 4.2.2 Settlement Hierarchy and Strategy and Chapter 6 Economic Development and Enterprise, in terms of general policy objectives as they relate to the Metropolitan Area.

Recommendation 2
Revise Core Strategy Table to identify SDZ population for plan period and refer to it long term population.
Identify the population target in the Core Strategy Table as the 6 year population figure to match the plan period.
Remove the SDZ from the settlement Hierarchy
See Revised Core Strategy Table in Appendix 1 of this document.

Key Town Ennis
Metropolitan Area **(Key component of the Limerick-Shannon Metropolitan Area Strategic Plan)** Shannon ~~SDZ~~ Sixmilebridge (Small Town) Athlunkard, Bunratty, Clonlara, Parteen, Ballycannon North, Meelick (Large Villages) Ardnacrusha, Cratloe, O'Briensbridge (Small Villages)
Service Towns Ennistymon/Lahinch, Kilrush/Cappa, Scarriff/Tuamgraney
Small Towns Kilkee, Killaloe, Lisdoonvarna, Miltown Malbay, Newmarket-on-Fergus, Tulla
Large Villages **Tier 1** llyvaughan, Clarecastle, Corofin, Crusheen, Doonbeg, Feakle, Inagh, Kilkishen, Mountshannon, Mullagh, Qui Quin, Whitegate, Liscannor, Kilfenora and Killimer **Tier 2** Kiladysert, Kilmihil
Small Villages Barefield, Bridgetown, Broadford, Carrigaholt, Cooraclare, Doora,Doolin, Kilmaley, Kilmurry, Labasheeda, ycasey, Ballinruan, Ballyea, Ballynacally, Bellharbour, Bodyke, Boston, Caher, Carron, Clooney, Connolly, Crar

Creegh, Cross, Doonaha, Fanore, Flagmount, Inch, Kilbaha, Kilbane, Killaneana, Kilmurry McMahon, Kilnaboy, Kilnamona, Kilshanny, Knock, Knockerra, Moy, Moyasta, O'Callaghans Mills, Ogonelloe, Querrin, Ruan, Spanish Point, Toonagh, Tubber
Clusters Ardkyle, Ballaghboy No.1, Ballaghboy No.2, Ballinooskey/Lisconner, Ballintlea South, Ballintlea South 2, Ballycar, Ballycorick, Ballyduff, Ballyea South, Ballyfaudeen, Ballyhannon North, Ballyhannon South No.1, Ballyhannon South No.2, Ballygireen, Ballymacahill, Ballymorris, Ballynagun West, Ballyveskil/Tiermaclane, Ballyvonnavaun/Deerpark, Ballyvrislaun, Barntick, Barloughra, Bartra, Bealaha, Bearnafunshin/Ballyogan, Beevrack, Behagh, Buncraggy, Caherea, Caherush, Cappa, Sixmilebridge, Carrowmeer, Castlecrine, Castlequarter, Castlequarter Kilkeedy, Cloonadrum, Cloonanaha, Cloonoughter, Coogyulla Cross, Coolisteige, Cratloekeel, Crosses of Annagh, Deerpark/Corlack, Doonass, Drumandoora, Drumdrehid, Drumeen, Drumline 1, Drumline 2, Drummina, Drumquin, Finvarra, Garraun, Garraunboy, Gilloge, Kildorus, Killeenan, Killow/Knockanimana, Kilmaley Lower, Kilmore, Kineilty, Knockfin, Knockloskeraun, Leamaneigh More, Lisduff, Lisheen, Luogh South, Manusmore, Maurices Mills, Meelick, Monaskeha, Mooghaun North, Mortyclough, Mountrivers Cluster, Murrooghkilly, Murroughtoohy South, New Quay, Newtown Cloonlara, ~~Noughaval~~, Portdrine, Poulawillin, Rockforest/Aughrim, Roo East, Sooreeny, South of Rossmanagher Bridge, Spancil Hill, Streamstown, The Wells, Tromra, Urlan More/Bellsfort, Williamstown, Woodpark
Countryside The countryside are those parts of County Clare outside of recognised settlements

Recommendation 3
No change.

Recommendation 4
No change.

Recommendation 5
See revised Core Strategy table at the end of this submission.

Recommendation 6
See revised Core Strategy table at the end of this submission and Core Strategy Statement as per recommendation to Observation 1.

I recommend the following amendment at Volume 1: Chapter 19 'Land Use and Zonings' Section 19.4 'Nature of Zonings':

Residential
Residential use shall be taken to primarily include the use of land for domestic dwellings. It may also provide for a range of other uses particularly those that have the potential to foster the development of new residential communities e.g. ~~schools~~ crèches and open spaces.

Strategic Residential Reserve
Strategic Residential Reserve lands have been identified across serviced settlements to facilitate longer term growth needs across the county. These lands comprise infill or contiguous sites or in some cases there is an on-site planning history of residential use. These lands are considered as the most appropriate site for the long-term sequential expansion of the relevant settlement. These Strategic Residential Reserve lands, in general, will not be brought forward for development within this plan period, with the following exceptions: ~~It is acknowledged that not all lands within the settlement boundaries of the serviced settlements will be required to 2029.~~

~~In these cases some lands have been included as a strategic residential reserve, where they comprise infill or contiguous sites or have a planning history of residential use and can form part of the long term sequential expansion of the settlement where considered appropriate.~~

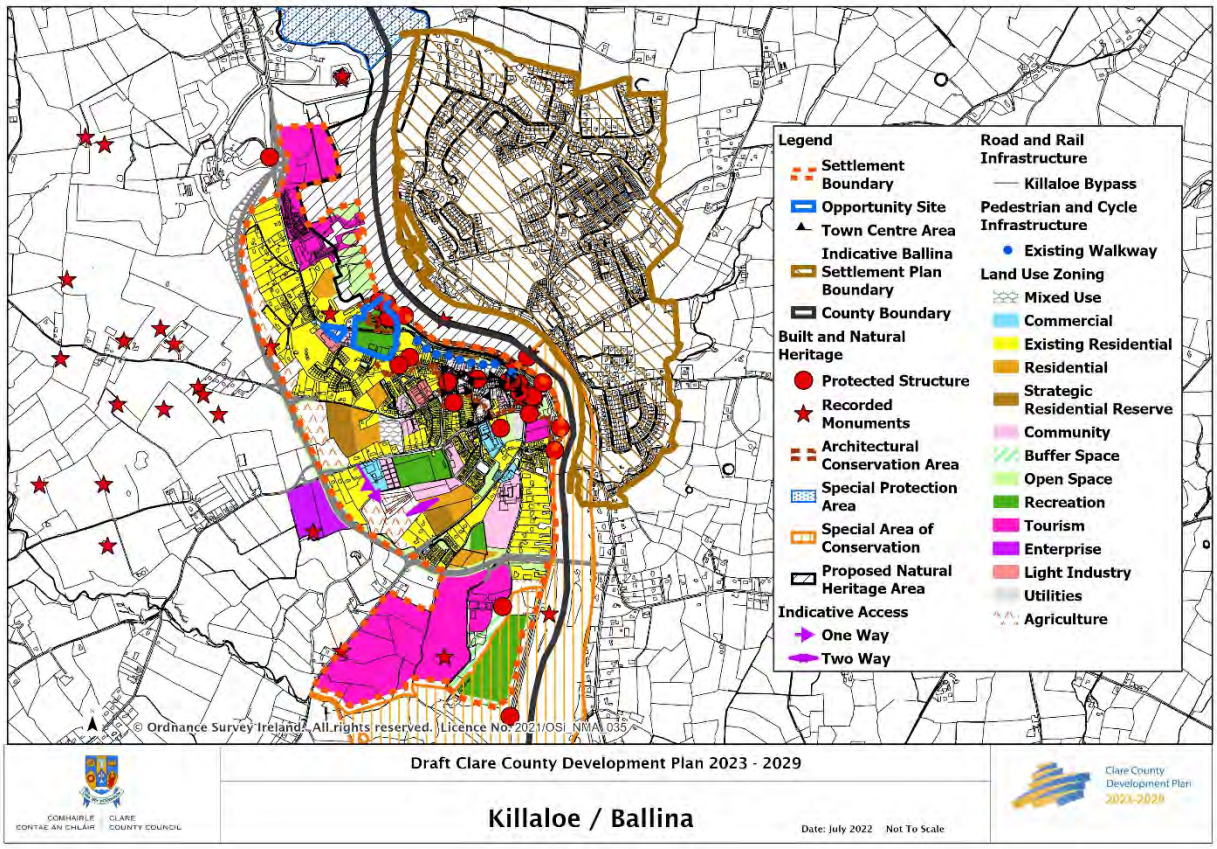
1. Non-residential development that is considered to be appropriate to the site context.

2. In addition to protecting these lands for the long term expansion of these settlements, consideration may be given to the development of some of the strategic residential reserve lands before the end of the current plan period where the Planning Authority is satisfied that the development of residential zoned land is progressing faster than expected and a shortage of available lands may arise or residential zoned land is not being brought forward ~~may not be delivered~~ as expected and a shortage may arise during the plan period. The development of such lands will only be considered from the beginning of year four of the Plan (April 2027) in order to give an opportunity for zoned land to be brought forward for development. Development proposals will only be favourably considered ~~and~~ where it can be clearly demonstrated to the satisfaction of the planning authority that a 'Residential' zoned parcel of land in the same settlement will not be brought forward for development due to infrastructural or other demonstrable constraints during the remaining period of the Plan. It will also be a requirement that the proposed 'Strategic Residential Reserve' lands can be serviced and offer a reasonable substitute in terms of being delivered within the lifetime of the plan and are sequential lands within the settlement ~~development~~ with good connectivity and access to services and amenity.

The above exceptions will be subject to compliance with the Core Strategy and the principles of proper planning and development of the area. Development of these 'Strategic Residential Reserve' lands will only be permitted where a substantiated case has been made to the satisfaction of the Planning Authority and the development permitted will not prejudice the future use of the remaining Strategic Residential Reserve lands for the longer-term growth needs of the plan area

In light of the above I recommend the Land Use Matrix be updated having regard to these proposed changes here and throughout the document. The revised Land Use Matrix is set out in Appendix 2.

Recommendation 7
Include a map in Volume 3c of Killaloe which shows the indicative settlement boundary of Ballina Settlement Plan relative to Killaloe at the rear of the Killaloe Settlement Statement.



Recommendation 8

Insert a section on Compact Growth as a new Section before Section 4.2.2 Settlement Hierarchy and Strategy in Chapter 4.

4.2.2 Compact Growth

The National Planning Framework's National Strategic Outcome of Compact Growth is fundamental for achieving the sustainable growth of our urban settlements. Clare County Council acknowledges the social and economic benefits of more compact settlements and is committed to delivering compact growth, through active land management and initiatives to revitalise urban settlements. The policies and objectives in this Plan promote the efficient use of urban lands to achieve compact growth, through the intensification, consolidation and positive revitalisation of our towns and villages throughout the County.

The compact growth concept requires the provision of higher densities and mixed-use developments in urban settlements, in order to ensure a more efficient use of scarce lands and to optimise public investment in infrastructure. This requires the integration of land use and transport, an intensification of use of existing underutilised lands and the consolidation of the built environment through the development of brownfield and infill lands, as well as the reuse of vacant and derelict buildings in urban settlements. In conjunction with the provision of social and green infrastructure, the principles of compact growth set the foundations for a higher quality of life, through the promotion of mixed-use settlements, served by sustainable modes of transport and the creation of an attractive environment in which to live, work and do business.

Successful compact growth requires enhanced connectivity and accessibility for pedestrians and cyclists, as well as the provision of viable public transport services through the concentration of higher density developments at strategic employment locations and along public transport nodes. There are many sustainability benefits of the compact growth concept compared to that of urban sprawl or greenfield developments at the edge of settlements. Such benefits include maximising the viability and cost efficiency of providing public transport and other infrastructure, as well as reduced car dependency and commuting times, which will facilitate the mitigation of climate change, through a reduction in traffic congestion, energy consumption and greenhouse gas emissions.

In accordance with the National Strategic Outcome of Compact Growth, the National Planning Framework requires 50% of all new housing in Limerick City subards (in Clare) be within the existing City and Suburbs built up footprint, through the development of brownfield and infill sites and revitalisation. Across the rest of the County, 30% of all new homes are to be provided within the existing built-up footprints of settlements.

The Local Authority acknowledges the social and economic benefits of more compact settlements as outlined above. Therefore, this Plan will continue to support the sequential approach to the delivery of development, with priority given to the revitalisation of settlements and the consolidation of the existing built environment, through the development of brownfield, infill and backland urban sites.

Recommendation 9
Include the following text amendment to Appendix 1 Development Management Standards A1.4.2 Multiple Residential Unit Developments

In the assessment of urban residential development proposals, the Planning Authority will promote increased residential density compliant with ~~have regard to~~ the Sustainable Residential Development in Urban Areas Guidelines (2009) and the accompanying document Urban Design Manual, A Best Practice Guide (2009) issued under Section 28 of the Planning and Development Act, 2000 (as amended). To achieve good urban design, the 12 urban design principles set out in the Urban Design Manual 2009 should be taken into account when designed any scheme:

Recommendation 10
No change.

Observation 1
I recommend a Core Strategy Statement be inserted into Chapter 3 Core Strategy before the Table 3.4 Core Strategy Table, as follows;

3.4.2 Core Strategy Statement
In summary, The Core Strategy has taken the following into account:

- Compliance with the NPF and RSES;
- The settlement hierarchy for the County as detailed in Table 2.1, which prioritises population and economic growth to the Key Town of Ennis, the MASP, Service Towns and Small Towns and promotes their continued growth;

- Accommodating local growth at a scale appropriate to the settlement size and function in the Service Towns, Small Towns and Large Villages;
- Facilitating residential development in serviced and unserviced settlements as an alternative to rural one-off housing;
- Management of urban generated growth in rural areas under urban influence, by ensuring single houses in the open countryside are based on the core consideration of demonstrable economic or social need to live in the rural area in addition to compliance with statutory guidelines, plans and having regard to ensuring the viability of villages and towns;
- Ensuring all lands identified for development are in accordance with the "Tiered Approach to Land Use Zoning" as set out in the NPF and identified in Appendix 1 of the Volume 3's;
- Climate change and sustainability; and
- Department of Environment, Heritage and Local Government, Guidance Note on Core Strategies (2010) and in particular Section 4 in so far as it relates to an excess associated with Strategic Development Zones. The Core Strategy has also been prepared and informed by the Housing Strategy and the Housing Need and Demand Assessment (HNDA). In addition, the following local context has informed the approach.
- The allocation of population growth to the settlements on a sustainable tiered approach based on the settlement hierarchy, the infrastructure services, demand, past delivery, jobs to resident workers ratio and potential growth. This means that settlements will grow at an appropriate rate and at a more self-sufficient level, thereby reducing the need to commute

The Core Strategy has also been prepared and informed by the Housing Strategy and the Housing Need and Demand Assessment (HNDA). In addition, the following local context has informed the approach.

- The allocation of population growth to the settlements on a sustainable tiered approach based on the settlement hierarchy, the infrastructure services, demand, past delivery, jobs to resident workers ratio and potential growth. This means that settlements will grow at an appropriate rate and at a more self-sufficient level, thereby reducing the need to commute;
- The consolidation of settlements and the distribution of many land use types within settlement boundaries including a mix of uses in the centre of settlements will facilitate reduced travel demand and also increase usage of sustainable modes of transport;
- The density approach is reflective of the higher order settlements i.e MASP, Key Towns, Service Towns, Small Towns and Villages and the existing built environment.
- Application of a graduated and responsive, tailored approach to the quantum of zoned lands having regard to Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages), and circular Letter NRUP 02/2021. Therefore, in addition to higher densities in settlements, consideration has been given to an element of lower density development which does not represent more than 20% of the total planned housing stock in any settlement;
- The quantum, location and distribution of new development has had regard to the capacity of existing and planned wastewater services infrastructure;

- The capacity of settlements to grow in the absence of necessary infrastructure, ie the LNDR ~~in the Limerick sub~~urbs and geographical constraints such as the River Shannon, and the Ardnacrusha Headrace, Parteen Bridge, and flood zones in the Limerick suburbs;
- The Ennis 2040 Economic and Spatial Strategy; and
- Environmental considerations have been taken into account in the preparation of the Core Strategy.

The focus of the Core Strategy is on developing and strengthening the role of the Key Town of Ennis, the Metropolitan Town of Shannon, the Limerick- Shannon Metropolitan Area, the Service Towns, Small Towns and villages and the sustainable development of our rural areas. There is a focus on achieving compact growth of our urban settlements thereby decreasing the distance that people must travel from their home to work and highlighting the importance of integrating land use and transportation planning. The Plan seeks to develop the Town Centre First approach and the concept of a 10-minute town, which will make our towns and neighborhoods better places to live, work and visit, improving the alignment of population and employment growth, sustainable mobility and climate action. Chapter 4 sets out in detail the Urban and Rural Spatial Strategy for the future development of the County

Additional Provision

The Core Strategy includes "Additional Provision" as per Section 4.4.3 of the Development Plan Guidelines, 2022. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing through inactivity on a particular landholding or site. Therefore, the use of the additional provision mechanism increases the probability of achieving the housing supply targets in the first instance.

The Development Plan Guidelines do not restrict the settlement tiers to which "Additional Provision" can be applied stating "The extent of any Additional Provision must be comprehensively identified, quantified and explained in the core strategy and should not exceed 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole, for any six-year plan period."

Additional Provision has been added across the County and its exact locations identified in the Core Strategy table. It is primarily used in Ennis and the Metropolitan Area and in areas where housing demand is highest and where adequate services are available to support it. It has also been used in some smaller scale settlements where the level of land provision is small and thus the additional provision increases the probability of achievement of the housing supply targets should this small supply be restricted.

Unmet Need

The population target for the County arising from the NPF is 7,231 people with a housing supply target of 4,500 provided by the Housing Supply Target Methodology. In addition, the Core Strategy provides for an additional 2,000 persons/1,260 units distributed across the County to meet the housing unmet needs of the additional population arising from the Humanitarian Response to Persons Arriving in Ireland fleeing the Conflict in Ukraine which is not represented in the NPF population projections. This is justified for the following reasons:

1. Data shows 3,500 displaced people from Ukraine currently residing in Clare. This is anticipated to continue increasing in the near term. This population is not accounted for in the NPF Implementation Roadmap population projections.
2. The preliminary 2022 Census results show an additional population of 1,000 over and above the NPF projection in 2022 for Clare.

Therefore the Core Strategy provides for a total population of 9,231 and housing units of 5,730.

Proposed South Clare/University of Limerick Economic Strategic Development Zone (SDZ)
The application for the proposed South Clare/University of Limerick Economic Strategic Development Zone (SDZ) is currently under consideration by the Minister. The Core Strategy Table identifies a population allocation for the proposed South Clare/University of Limerick Economic Strategic Development Zone (SDZ) which is yet to be designated but has the potential to be in place to some extent during the lifetime of this Plan. Its population allocation for the plan period is 197. The full extent of the potential of the proposed SDZ with a future population of 3,500 is above and beyond the scope of the population allocation in the current cycle and is seen as a medium to long term project of regional and national importance. In this regard the Department of Environment, Heritage and Local Government, Guidance Note on Core Strategies Section 3 provides scope for such excess, allowing Development Plan Core Strategies to consider later phases of development in SDZs as part of a strategic land bank. Hence it is important that the full proposed SDZ population of 3,500 is identified at this point in time.

Extant Permissions
In limited circumstances, where there is outstanding planning permissions for dwelling units, such development or commitments may result in a small number of settlements appearing to be over zoned, this is applicable in Ennis, Clonlara, Bunratty Crusheen, and Tulla. In these cases any apparent over zoning is resulting from dwellings yet to be completed prior to this Plan coming into effect which has been accounted for in the calculation of the 6 year HST figure. It is deemed important that the plan allows for the quantum of completions provided for prior to the coming into effect of this plan.

Phasing
It is not considered appropriate to impose phasing on the development of lands which are located within or contiguous to the existing built-up area of Settlements. The imposition of further phasing could lead to uncertainty in the market which may impact the delivery of development at suitable locations identified for growth.

Compact Growth
In accordance with the National Strategic Outcome of Compact Growth, the National Planning Framework requires 50% of all new housing in Limerick City suburbs (in Clare) be within the existing built-up footprint of the Suburbs, through the development of brownfield and infill sites and revitalisation. Across the rest of the County, 30% of all new homes are to be provided within the existing built-up footprints of settlements. This is reflected in the Core Strategy Table; the compact growth portion is to be achieved in Mixed Use lands within and contiguous to town centres. The remaining housing is to be achieved on residentially zoned sites.

While these residential zoned lands are greenfield by nature many of these lands also fall within the definition of compact growth as they are largely within the CSO boundaries.

Strategic Residential Reserve

Strategic Residential Reserve lands have been identified across serviced settlements to facilitate longer term growth needs across the county. These lands comprise infill or contiguous sites or in some cases there is an on-site planning history of residential use. These lands are considered as the most appropriate site for the long-term sequential expansion of the relevant settlement. These Strategic Residential Reserve lands in general, will not be brought forward for development within this plan period, except where the Planning Authority is satisfied that the development of residential zoned land is progressing faster than expected and a shortage of available lands may arise, or residential zoned land is not being brough forward as expected and a shortage may arise during the plan period.

The development of such lands will only be considered from the beginning of year four of the Plan (April 2027) in order to give an opportunity for zoned land to be brought forward for development. Development proposals will only be favourably considered where it can be clearly demonstrated to the satisfaction of the planning authority that a 'Residential' zoned parcel of land in the same settlement will not be brought forward for development due to infrastructural or other demonstrable constraints during the remaining period of the Plan. It is important that these lands continue to be identified as part of the longer -term residential land supply to bring some certainty to the development process.

Development Plan Objective: Core Strategy	
CDP 3.1	It is an objective of Clare County Council: To support the delivery of the Core Strategy in accordance with the Core Strategy Table 3.4 and the Core Strategy Map 3A.

Development Plan Objective: Supply of Zoned Land	
CDP 3.2	It is an objective of Clare County Council: To ensure that sufficient land continues to be available to satisfy the housing requirement of the County over the lifetime of the Plan.

Delete the text after the Core Strategy Table

~~**Density**~~

~~Density for each settlement is calculated in line with the tailored approach to the quantum of zoned lands having regard to Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages), and circular Letter NRUP 02/2021. In addition to higher densities in settlements consideration has been given to the provision of an element of lower density development which does not represent more than 20% of the total~~

planned housing stock in any settlement. The split between the higher and lower density used is identified for each settlement. All densities referred to are 'net' values. See Appendix A of the Sustainable Residential Development Guidelines for further definition. Consequently 20% is added to the land requirement to cater for open space, distributer roads etc.

Housing Land Requirement

This figure is based on each settlement achieving 30% of planned units within the existing built up fabric. The housing land requirement for the remaining 70% of lands has been calculated having regard to densities as set out above.

Additional Provision

The Housing land requirement is based on the housing supply target for County Clare plus "Additional Provision". The Development Plans Guidelines for Planning Authorities, Draft for Consultation August 2021 provides for Additional Provision which shall not exceed 20-25% of the required quantum of zoned land and sites in any planning authority area as a whole, for any 6 year period. Additional provision of 25% has been applied to the Core Strategy and is essential in the County Clare Scenario for the following reasons:

- The NPF Population targets are lower than historic population provision for County Clare hence the additional provision is essential to ensure a transition between the former quantity of zoning and that which is required to facilitate growth arising from the NPF;
- Ennis 2040, A Economic and Spatial Strategy to support compact growth and realise sustainable economic, social and environmental opportunities in Ennis and Clare; and
- The Housing Strategy has identified that in County Clare as overall housing delivery increases, the proportion of single rural dwellings declines. Therefore demand for single rural housing may be reduced if sufficient supply of attractive and affordable homes in rural towns and villages is available.

Zoned Housing land as per Settlement Maps

This figure is higher than the "Housing Land Requirement" for a number of settlements for the following reasons:

1. Not all settlements can achieve the full 30% of planned units within the existing built up footprint and therefore some of this requirement is redirected to residential greenfield sites. This is based on local knowledge of vacant, derelict and brownfield opportunities in settlements.
2. Zoned land requirement is based on the Housing Supply Target. In arriving at the H ST, the methodology requires that estimated completions for 2021 to 2023 be subtracted from the overall target. Thus these future completions reduce the overall future housing supply target for the plan period but have yet to be delivered. Therefore the zoning of land must facilitate the HST figure but also the future completions between now and the start of the plan period, in the absence of catering for the future completions, the zoning for the HST alone would not be able to facilitate this given that future completions equates to 15% of the HST figure. The figure of 668 units is the estimated completions between Q3 2021 up

to the end of Q1 2023 for County Clare. Therefore this figure is interchangeable with extant permissions as these equate to future completions. Therefore lands with an extant planning permission are deemed not to be within the housing land requirement for the plan period and are in addition to that land (ie future completions already subtracted from the HST). This has been factored into settlements where applicable and the total yield of such land/units is a portion of the overall total having regard to the number of completions that will occur in the countryside. This does not impact the population target or housing supply target figures.

3. Additional lands are zoned in some settlements to cater for the 'net need' as per Clare County Council's Housing List. This relates to households/persons who are qualified for social housing support, and are not currently living in accommodation owned or leased by the Council or an Approved Housing Board (AHB), and are not currently in a Housing Assistance Payment (HAP) or Rental Accommodation Scheme (RAS) tenancy. The additional land requirement for this need in applicable settlements has taken account of Social Housing Units currently under construction and also Part V agreements for extant planning permissions in arriving at the additional zoned land requirement. This additional land does not impact on the population target as it relates to meeting the unmet social housing needs of the existing population prior to this Plan period.
4. Zoning parcels of land in a logical manner and following the closest natural boundary.

Strategic Development Zone (SDZ)

The Core Strategy includes a population figure of 3,500 for the proposed South Clare/University of Limerick Economic Strategic Development Zone (SDZ) which is yet to be designated but has the potential to be in place to some extent during the life time of this Plan. This project is above and beyond the scope of the population allocation and is seen as a medium to long term project of regional and national importance. In this regard the Department of Environment, Heritage and Local Government, Guidance Note on Core Strategies Section 3 provides scope for such excess, allowing Development Plan Core Strategies to consider later phases of development in SDZs as part of a strategic land bank. In addition the new Draft Development Plan Guidelines for Planning Authorities (Aug. 2021, p. 55) also allow zoning provision for "any parts of strategic and sustainable development sites that will be phased and built out over a longer period than the six-year development plan (such as large-scale urban regeneration areas, transport-led development sites or SDZs) …as Additional Provision lands."

SDZ Housing Units 123 + **

It is anticipated that the SDZ will have a population allocation of 3,500 in total. This additional population is ring fenced and is crucial for supporting the SDZ designation and future masterplanning. The proposed South Clare/UL Economic SDZ is planned to become Europe's first 21st Century University Campus of this nature, merging education, enterprise, employment and housing modelled on the best modern on-campus living. Pending the completion of the masterplanning exercise the exact number of housing units to be provided on site is unclear as

~~this is not the traditional model of living and will have various types and models of accommodation.~~

Observation 2
No change

Observation 3
I recommend the Draft Plan is updated having regard to the publication of the Regional Enterprise Plan to 2024 for the Mid-West. Text in relation to Section 6.3 Mid-West Regional Plan shall be replaced with text referring to the Regional Enterprise Plan to 2024 for the Mid-West as follows

~~**6.3 Mid-West Regional Enterprise Plan**~~

~~The *Mid-West Regional Enterprise Plan* is a bottom-up initiative which is aimed at driving economic growth and sustaining better standards of living. The plan complements and builds on the existing activities being undertaken by the Enterprise Agencies, the LEOs and the wider range of State Bodies directly involved in supporting enterprise development. It is supported by the Regional Enterprise Development Fund and significant funding has been secured from this source by Future Mobility Campus Ireland for the connected autonomous vehicle test bed in Shannon. Clare County Council and LEO Clare will continue to work with the relevant stakeholders to build on this success, to proactively progress the delivery of the actions set out in the Regional Enterprise Plan and to seek further job creation in various sectors including manufacturing, tourism, med-tech, aviation and aerospace, food and beverage, and sports and design, where there is real potential for job creation.~~

~~Development Plan Objective:~~ ~~Mid-West Regional Enterprise Plan~~	
~~**CDP6.2**~~	~~It is an objective of Clare County Council and LEO Clare:~~ ~~To collaborate with all relevant stakeholders in proactively progressing the delivery of the actions set out in the *Regional Enterprise Plan* (or any updated/superseding plan).~~

6.3 Regional Enterprise Plan to 2024 for the Mid-West

The *Regional Enterprise Plan to 2024 for the Mid-West* is future-focused and centred around a number of priorities including:

- to enable innovation across the region,
- to contribute to the region's ambition to lead on sustainability and low carbon,
- to create a balanced region, where both urban and rural communities can work together,
- growing new and existing small business, and
- assisting enterprise growth in more rural areas and areas of high unemployment.

The plan complements and builds on the existing activities being undertaken by the Enterprise Agencies, the LEOs and the wider range of State Bodies directly involved in supporting enterprise development and is supported by the Regional Enterprise Development Fund (REDF). A number of ambitious enterprise development projects have been supported by the REDF

which will be significant catalysts and economic drivers for the region including the Future Mobility Campus Ireland for the connected autonomous vehicle test bed in Shannon and Clare Maritime Enterprise Zone in Kilrush. The Plan identifies key actions which will contribute further to the development of the Region, these include:

- Creation of a sustainable Regional Film Industry in the Mid-West,
- Progress regional data centre projects with an emphasis on innovation and sustainability,
- Innovation in education – inclusive, immersive, enterprise focused education programs, the Atlantic Green Digital Basin – decarbonising industry by developing the Shannon Estuary as a renewable energy hub.
- Build regional research, education and training capacity for emerging renewable energy opportunities,
- Create an efficient and sustainable regional network of enterprise centres and remote working; Create an efficient and sustainable regional network of enterprise centres and remote working eHubs,
- Establish a world class Marine, Renewable, Science and Climate Change Centre in Kilrush.

New funding of up to €180m will be made available for the development and implementation of collaborative and innovative enterprise projects that can make a significant impact on enterprise development in the regions. Clare County Council and LEO Clare will continue to work with the relevant stakeholders to build on this success, to proactively progress the delivery of the actions set out in the Regional Enterprise Plan and to seek further job creation in various sectors including manufacturing, tourism, med-tech, aviation and aerospace, food and beverage, and sports and design, where there is real potential for job creation.

Development Plan Objective: Regional Enterprise Plan to 2024 for the Mid-West	
CDP6.2	It is an objective of Clare County Council and LEO Clare: To collaborate with all relevant stakeholders in proactively progressing the delivery of the actions set out in the *Regional Enterprise Plan to 2024 for the Mid-West* (or any updated/superseding plan).

Recommendation 11
I recommend the insertion of a Table as below after Table 7.1 and the following text and amendments to the text of Chapter 7 Retail as set out below.

Table 7.2 as below sets out the future retail floorspace in the retail catchments of the County.

Final Future Retail Floorspace Potential (Cumulative) - Adjusted for Vacancy & Pipeline		
Retail Goods Type	**Floorspace Capacity (m2)**	
	2026	**2029**
[1] Limerick Catchment Metro - Clare Portion		

Convenience Goods	3,594	5,599
Comparison Goods (Non-Bulky)	5,570	12,259
Comparison Goods (Bulky)	-753	311
Total Retail Floorspace Potential	**8,411**	**18,170**
[2] Limerick Catchment Remainder - Clare Portion		
Convenience Goods	399	622
Comparison Goods (Non-Bulky)	619	1,362
Comparison Goods (Bulky)	-753	311
Total Retail Floorspace Potential	**265**	**2,296**
[3] Ennis Catchment		
Convenience Goods	2,604	3,897
Comparison Goods (Non-Bulky)	2,707	5,924
Comparison Goods (Bulky)	1,481	3,326
Total Retail Floorspace Potential	**6,792**	**13,147**
[4] Kilrush Catchment		
Convenience Goods	1,444	2,114
Comparison Goods (Non-Bulky)	1,460	2,274
Comparison Goods (Bulky)	414	751
Total Retail Floorspace Potential	**3,319**	**5,138**
[5] Ennistymon Catchment		
Convenience Goods	3,688	4,184
Comparison Goods (Non-Bulky)	623	882
Comparison Goods (Bulky)	134	368
Total Retail Floorspace Potential	**4,444**	**5,434**
[6] Scariff Catchment		
Convenience Goods	1,192	1,385
Comparison Goods (Non-Bulky)	94	270
Comparison Goods (Bulky)	-1,219	-1,155
Total Retail Floorspace Potential	**66**	**500**
[1]+[2]+[3]+[4]+[5]+[6] County Clare Total (excl. Limerick Catchment portion in Limerick)		
Convenience Goods	12,921	17,801
Comparison Goods (Non-Bulky)	11,073	22,971
Comparison Goods (Bulky)	-697	3,912
Total County Retail Floorspace Potential	**23,298**	**44,684**

Amend section 7.5.2 to read:

~~However, there is an identified need for retail warehouse development of varying scales in the Ennis and Shannon Areas.~~ However, there is an identified need for retail warehouse development of notable scale in the Ennis retail catchment area, alongside more modest requirements towards the end of the Plan period identified in the retail catchment areas encompassing Kilrush, Shannon and the County-Clare portion of the shared Limerick retail area as well.

Amend CDP7.18 as follows

"~~b) To permit new retail warehouse development in the Shannon Town and Environs area subject to the application of the sequential test and the preparation of a Retail Impact Assessment to ensure that there will be no negative impacts on the vitality and viability of the town centre area.~~ b) To consider new retail warehouse development in the other retail catchment areas, in instances where it would target a qualitative improvement of existing bulky goods retailing and without exceeding the additional requirements identified. Further, that any such consideration be subject to the application of the sequential test and the preparation of a Retail Impact Assessment to ensure that there will be no negative impacts on the vitality and viability of associated town centre areas."

Observation 4
No change.

Observation 5
No change.

Recommendation 12
See recommendation to TII submission S2-002 in this regard.

Observation 6
No change.

Recommendation 13
See recommendation to OPW submission S2-007, and the recommendations arising from same.

Observation 7
No change.

Observation 8
Implementation and Monitoring amendments set out below.

General and procedural matters
I recommend that Section 5.2.3 Social and Affordable Housing is amended as follows.

In line with the objectives of both the NPF and the RSES the provision of appropriate social and affordable housing in town and village centres through the renovation of existing housing stock or brownfield/infill site redevelopment can make a significant contribution to settlement renewal, compact growth and the increased sustainability of settlements in Clare. Clare County Council will promote the conversion of vacant properties into new social and affordable homes through schemes including the Repair and Leasing Scheme, the Buy and Renew Scheme, and long-term leasing, and will encourage owners of vacant properties to avail of these schemes. In instances where the local authority is developing social or affordable housing, or purchasing property for such uses, it is essential to ensure that all members of society have access to accommodation that is suitable for their needs. The Urban Housing and Regeneration Act 2015 made amendments to

Part V the Planning and Development Act, 2000 (as amended). Section 94 of the Planning and Development Act now provides that a specified percentage, not being more than 10% of land zoned for residential use, or for a mixture of residential and other uses, shall be reserved for the provision of social and affordable housing. Compliance with the requirements of Part V of the Planning and Development Act, 2000 (as amended) will be achieved in accordance with Section 96 of that Act, which was also amended by ~~the Urban Housing and Regeneration Act,~~ 2015 Affordable Housing Act 2021. Any subsequent amendments to the legal requirement to deliver this housing during the lifetime of this Plan will also be complied with.

Appendix 1 – Core Strategy Table

Settlement Typology	Settlement	2016 Population	Population Target 2029	2023-2029 Population Target	Housing Units Target	Compact Growth/Infill/ Brownfield(Units)	Residential Units to be Delivered on Green Field Sites	Density	Green Field Land Required for Residential Development (ha)	Additional Provisional (ha)	Green Field Land Required for Residential Development +Additional Provisional (ha)	Unmet Population	Unmet Units by Location	Land Requirement for unmet Demand (ha)	2023-2029 Population Target + Unmet Population	Housing Units Target + Unmet Demand	Compact Growth/Infill/ Brownfield(Units) for Unmet Demand	Residential Units to be Delivered on Green Field Sites for Unmet Demand	Land Requirement for Population Target + Additional Provisional+ Unmet Demand	Zoning as per Map (ha)
Key Town	Ennis	25,276	29,629	2,480	1,550	465	1085	35/15	47.12	11.78	58.90	976	610	18.54	3456	2160	648	1512	77.44	83.81
Totals		**25,276**	**29,629**	**2,480**	**1550**	**465**	**1085**		**47.12**	**11.78**	**58.90**	**976**	**610.00**	**18.54**	**3456**	**2160**	**648.00**	**1512.00**	**77.44**	**83.81**
Metropolitan Area	Shannon	9,899	10,947	883	552	166	386	35/15	16.78	5.45	22.23	146	91	2.77	1029	643	193	450	25.00	
	SDZ		197	**197**	123	37	86								197	123				
	Sixmilebridge	2,669	3,169	298	186	56	130	35/15	5.65	1.26	6.91	42	26	0.79	340	212	64	148	7.70	7.26
	Athlunkard	3,486	395	179	112		112	35	3.07	0.5	3.57	48	30	0.82	227	142		142	4.39	4.92
	Bunratty	375	424	66	41	12	29	30/15	1.38	0.35	1.73				66	41			1.73	4.29
	Clonlara	684	266	118	74	22	52	30/15	2.49	1	3.49	24	15	0.50	142	89	27	62	3.99	4.50
	Parteen	834	880	42	26		26	30/15	1.25	0.29	1.54	48	30	1.44	90	56		56	2.98	2.60
	Ballycannon North(meelick)	917	847	42	26	8	18	30/20	0.80	0.7	1.50				42	26			1.50	1.73
Unserviced Metropoliton Area Including Small Villages and Open Countryside		8,604	11,521	146	74										146	74				
Totals		**27,468**	**28,646**	**1,971**	**1214**	**301**	**839**		**31.42**	**9.55**	**40.97**	**308**	**192.00**	**6.32**	**2279**	**1406**	**283.20**	**858.80**	**47.30**	**25.31**
Service Town	Ennistymon/ Lahinch	1,567	1,878	186	116	35	81	25/10	5.07	1.27	6.34	116	73	3.19	302	189	57	132	9.53	9.65
	Kilrush/Cappa	2,489	2,975	296	185	56	130	25/10	8.08	2	10.08	106	66	2.88	402	251	75	176	12.96	12.79
	Scarriff/ Tuamgraney	805	1,017	94	59	18	41	20/10	2.97	0.59	3.56	86	54	2.72	180	113	34	79	6.29	6.08
Totals		**4,861**	**5,870**	**576**	**360**	**108**	**252**		**16.12**	**3.86**	**19.98**	**308**	**193.00**	**8.79**	**884**	**553**	**165.90**	**387.10**	**28.77**	**28.52**
Small Town	Kilkee	1,155	1,631	102	64	19	45	20/10	3.23	1.3	4.53	78	49	2.47	180	113	34	79	7.00	7.21
	Killaloe	1,393	1,669	123	77	23	54	25/10	3.36	0.5	3.86	67	42	1.83	190	119	36	83	5.70	6.08
	Lisdoonvarna	800	1,125	70	44	13	31	20/10	2.22	1	3.22	18	11	0.55	88	55	17	39	3.77	3.81
	MiltownMalbay	769	897	69	43	13	30	20/10	2.17		2.17				69	43			2.17	2.48
	Newmarket-on-Fergus	1,968	2,255	174	109	33	76	25/10	4.76	0.9	5.66	61	38	1.66	235	147	44	103	7.32	6.82
	Tulla	759	864	67	42	13	29	25/10	1.83		1.83				67	42			1.83	5.77
Totals		**6,844**	**8,441**	**605**	**379**	**114**	**265**		**17.57**	**3.70**	**21.27**	**224**	**140.00**	**6.52**	**829**	**519**	**130.20**	**303.80**	**27.79**	**32.18**
Large Villages-Tier1	Ballyvaughan	327	452	24	15		15	15/10	1.32	1	2.32	16	10	0.88	40	25		25	3.20	2.58
	Clarecastle (Ennis figure)																			
	Corofin	751	814	53	33		33	20/15	2.11	0.66	2.77	48	30	1.92	101	63		63	4.69	4.68
	Crusheen	534	647	38	24		24	20/10	1.73	0.43	2.16				38	24			2.16	4.29
	Doonbeg	342	376	24	15		15	15/10	1.32		1.32	35	22	1.94	59	37		37	3.26	2.98
	Feakle	250	316	18	11		11	15/10	0.97		0.97	16	10	0.88	34	21		21	1.85	2.09
	Inagh	247	337	18	11		11	20/15	0.70	0.3	1.00				18	11			1.00	1.00
	Kilkishen	592	681	45	26		26	15/10	2.29	0.3	2.59				45	26			2.59	2.82
	Mountshannon	170	211	13	8		8	15/10	0.70	1	1.70				13	8			1.70	1.73
	Mullagh	146	156	10	6		6	20/15	0.38	0.1	0.48	16	10	0.64	26	16		16	1.12	1.26
	Quilty	211	248	14	9		9	15/10	0.79		0.79	16	10	0.88	30	19		19	1.67	1.11
	Quin	984	1,091	70	44		44	20/15	2.82	1	3.82	26	16	1.02	96	60		60	4.84	5.21
	Whitegate	207	236	14	9		9	15/10	0.79		0.79		10	0.88	14	19		19	1.67	1.42
	Liscannor	182	259	14	9		9	15/10	0.79	0.7	1.49				14	9			1.49	1.44
	Kilfenora	290	306	21	13		13	15/10	1.14		1.14	11	7	0.62	32	20		20	1.76	1.47
	Kilimer	146	174	10	6		6	15/10	0.53	0.5	1.03				10	6			1.03	1.12
Totals		**5,379**	**6,304**	**386**	**239**		**239**		**18.39**	**5.99**	**24.38**	**184**	**125.00**	**9.66**	**570**	**364**		**280.00**	**34.03**	**35.21**
Unserviced: Tier 2 Large Village & Small Village &Open Countyside		48,989	55,760	1213	758	227	531								1213	758				
Totals		**48,989**	**55,760**	**1213**	**758**	**227**	**531**								**1213**	**758**				
		118,817	**134,650**	**7,231**	**4,500**	**1,215**	**3,211**		**131**	**35**	**166**	**2,000**	**1,260**	**50**	**9,231**	**5,760**	**1,227**	**3,342**	**215**	**205**

SDZ Population of **197** with an additional 3,303 as a long-term population. Total 3,500.

Appendix 2

Indicative Land Use Zoning Matrix

The purpose of the land-use zoning matrix is to provide an indication only of the type of developments that may or may not be normally considered or open for consideration on zoned lands. Each proposal submitted to the Council for consideration will be assessed based on its own individual merits.

Key

Note: all development proposals will be assessed thoroughly through the Development Management process in accordance with Section 34 of the Planning and Development Act, 2000 (as amended).

✓ = **Will normally be acceptable in principle.**

A proposed use that will be classified as acceptable in principle in the relevant zone subject to compliance with policies and objective as set out in this plan and in accordance with the proper planning and sustainable development of the area.

O = **Open to consideration.**

A proposed use that will be open to consideration, but subject to particular considerations for example, compatibility with adjoining uses, scale or whether or not the proposal is prejudicial to the amenities of an area or the residential amenities of an adjoining property.

X = **Will not normally be acceptable.**

A proposed use that is classified "will not normally be acceptable" in a specific zoning will not be accepted by the Planning Authority.

Land Use	Mixed Use	Existing residential	Residential	Low Density Residential	Commercial	Community	Recreation	Open Space	Buffer Space	Enterprise	Tourism	Industry	Light Industry	Maritime / Harbour	Agriculture	Marine Related Industry
Allotments	X	O	X	X	X	O	O	O	X	O	O	X	X	X	✓	X
Advertisement Structures	✓	X	X	X	✓	O	O	X	X	O	O	O	O	O	X	O

Land Use	Mixed Use	Existing residential	Residential	Low Density Residential	Commercial	Community	Recreation	Open Space	Buffer Space	Enterprise	Tourism	Industry	Light Industry	Maritime / Harbour	Agriculture	Marine Related Industry
Agri. Business	O	X	X	X	O	X	X	X	X	✓	O	O	✓	X	O	×
Agri. Tourism	O	X	X	X	O	O	X	X	X	✓	✓	X	X	X	✓	×
Amusement Arcade	O	X	X	X	O	X	X	X	X	X	O	X	X	X	X	X
B & B /Guesthouse	✓	O	✓	✓	✓	X	X	X	X	X	✓	X	X	X	O	X
Bank / Financial Institution	✓	X	~~O~~ X	X	✓	X	X	X	X	O	X	X	X	X	X	X
Betting Office	O	X	X	X	✓	X	X	X	X	X	X	X	X	X	X	X
Boarding Kennels	X	X	X	X	X	X	X	X	X	✓	X	X	O	X	O	X
Carpark	✓	X	~~O~~ X	X	✓	O	O	X	X	✓	O	✓	✓	O	X	X
Caravan Park/Camp Site/ Motor Home Park (Tourist uses)Glamping	O	O	~~O~~ X	~~✓~~ X	X	O	O	X	X	X	✓	X	X	X	O	X
Cash & Carry/ Wholesale Outlet	O	X	X	X	✓	X	X	X	X	O	X	X	O	X	X	X
Cemetery	X	X	X	X	O	O	X	~~X~~ O	X	X	X	X	X	X	O	X
Chemist / Pharmacy	✓	O	~~O~~ X	X	~~O~~ ✓	O	X	X	X	X	X	X	X	X	X	X
Cinema / Theatre	✓	X	X	X	✓	X	X	X	X	X	X	X	X	X	X	X
Civic & Amenity Recycling Facility	✓	O	O	O	O	O	X	X	X	✓	X	✓	✓	O	O	O
Civic / cultural / heritage building	~~O~~ ✓	X	X	X	~~X~~ O	✓	O	X	X	O	~~O~~ ✓	X	X	O	X	~~X~~ O
Community Facility	~~O~~ ✓	~~O~~ ✓	O	O	O	✓	O	X	X	✓	O	X	X	~~X~~ O	X	X
Composting Facility	X	X	X	X	X	O	X	X	X	O	X	~~X~~ O	O	X	O	X
Construction & Demolition (C&D) Waste Recycling Centre	X	X	X	X	X	X	X	X	X	X	X	O	✓	O	O	O
Créche / Childcare Facility	✓	✓	✓	~~O~~ X	✓	✓	X	X	X	✓	X	O	O	X	X	X

Land Use	Mixed Use	Existing residential	Residential	Low Density Residential	Commercial	Community	Recreation	Open Space	Buffer Space	Enterprise	Tourism	Industry	Light Industry	Maritime / Harbour	Agriculture	Marine Related Industry
Data Centre	X	X	X	X	X	X	X	X	~~✓~~ X	~~X~~✓	X	✓	~~✓~~ X	X	X	X
Disco / Night club	O	X	X	X	O	X	X	X	X	X	X	X	X	X	X	X
Doctor/Dentist	✓	~~✓~~ O	~~✓~~ O	O	✓	O	X	X	X	O	X	X	X	X	X	X
Dog Grooming	✓	O	~~O~~ X	~~O~~ X	O	X	X	X	X	O	X	X	~~X~~ O	X	X	X
Education/Enterprise Centre	~~O~~ ✓	O	~~O~~ X	~~O~~ X	✓	✓	X	X	X	✓	X	X	O	X	X	X
Function Room	O	X	~~O~~ X	~~O~~ X	O	O	O	X	X	X	✓	X	X	O	X	~~X~~ O
Funeral Home	O	X	X	X	✓	O	X	X	X	X	X	X	X	X	O	X
Fuel Depot	X	X	X	X	X	X	X	X	X	O	X	O	O	X	X	O
Garden Centre	O	X	X	X	O	X	X	X	X	O	O	O	✓	X	O	X
Golf Course / Pitch and Putt	O	X	X	X	X	O	✓	✓	X	O	✓	X	X	X	O	X
Go-kart track	X	X	X	X	X	X	O	X	X	O	~~X~~ O	X	O	X	O	X
Hair Dressing Salon & Beauticians	✓	O	O	O	~~O~~ ✓	X	X	X	X	X	X	X	X	X	X	X
Health Centre / clinic	✓	O	~~O~~ X	~~O~~ X	✓	✓	X	X	X	O	X	X	X	X	X	X
Heavy Vehicle Park	×	x	x	x	O	×	x	x	x	O	x	√	√	O	O	O
Helicopter Pad	O	X	X	X	O	X	X	X	X	O	O	O	O	X	O	O
Home Based Economic Activities	✓	O	O	O	✓	X	X	X	X	O	X	X	X	X	O	O
Hospital	O	X	~~O~~ X	~~O~~ X	O	O	X	X	X	O	X	X	O	X	X	X
Hostel	O	O	~~O~~ X	~~O~~ X	O	X	X	X	X	X	✓	X	X	X	X	X
Hotel	~~O~~ ✓	X	~~O~~ X	~~O~~ X	O	X	X	X	X	X	✓	X	X	~~X~~ O	X	X
Industry	X	X	X	X	O	X	X	X	X	X	X	✓	O	X	X	O
Industry - Light	O	X	X	X	O	X	X	X	X	✓	X	O	✓	X	X	O
Launderette/Dry Cleaner	✓	~~O~~ X	~~O~~ X	~~O~~ X	✓	X	X	X	X	X	X	X	X	X	X	X

Land Use	Mixed Use	Existing residential	Residential	Low Density Residential	Commercial	Community	Recreation	Open Space	Buffer Space	Enterprise	Tourism	Industry	Light Industry	Maritime / Harbour	Agriculture	Marine Related Industry
Leisure / gym /rec. sports club	✓	~~O~~ X	~~O~~ X	~~O~~ X	✓	O	✓	O	X	O	✓	X	O	O	X	X
Library	✓	~~O~~ X	~~O~~ X	~~O~~ X	✓	✓	O	X	X	O	O	X	X	X	X	X
Liquor License Premises	✓	~~O~~ X	~~O~~ X	X	✓	X	X	X	X	X	O	X	X	X	X	X
Lorry Depot	X	X	X	X	O	X	X	X	X	O	X	O	O	X	O	O
Mart / Co-op	O	X	X	X	~~X~~ O	X	X	X	X	O	X	O	O	X	O	X
Motor Sales / Repairs / Service	O	X	X	X	✓	X	X	X	X	O	X	X	O	X	X	X
Multiple Residential Units	O	O	✓	O	X	X	X	X	X	X	X	X	X	X	X	X
Nursing Home/Retirement Village	O	O	✓	~~✓~~ X	X	✓	X	X	X	X	X	X	X	X	O	X
Office <100m²	✓	O	X	~~O~~ X	✓	~~X~~ O	X	X	X	✓	~~X~~ O	X	X	O	X	X
Office 100m²-1000m²	O	X	X	X	✓	X	X	X	X	✓	X	X	X	X	X	~~X~~ O
Office > 1000m²	O	X	X	X	✓	X	X	X	X	✓	X	X	O	X	X	X
Open Space	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	O	✓	X
Petrol Station	O	X	X	X	O	X	X	X	X	X	X	X	O	X	X	X
Plant / tool hire	O	X	X	X	O	X	X	X	X	X	X	O	O	X	O	X
Playground	✓	✓	✓	✓	O	✓	✓	O	X	O	O	X	O	O	O	X
Playing pitches	O	~~✓~~ X	~~O~~ X	~~O~~ X	O	✓	✓	O	X	X	X	X	O	X	✓	×
Primary Care Facility	✓	~~O~~ X	~~O~~ X	~~O~~ X	O	O	X	X	X	O	X	X	X	×	X	X
Refuse Landfill	X	X	X	X	X	X	X	X	X	X	X	O	X	X	X	×
Religious Places of Worship	O	O	~~O~~ X	X	X	✓	X	X	X	X	X	X	X	X	O	X
Research and development	O	X	X	X	~~O~~ X	X	X	X	X	✓	X	O	O	X	X	O

Land Use	Mixed Use	Existing residential	Residential	Low Density Residential	Commercial	Community	Recreation	Open Space	Buffer Space	Enterprise	Tourism	Industry	Light Industry	Maritime / Harbour	Agriculture	Marine Related Industry
Residential – single dwelling (Permanent Occupation)	✓	~~O~~ X	~~✓~~ O	✓	X	O	X	X	X	X	X	X	X	~~O~~ X	O	X
Residential – single dwelling (short-term tourist accommodation)	O	O	O	O	X	X	X	X	X	X	O	X	X	O	X	X
Residential Institution	O	O	O	O	O	O	X	X	X	X	X	X	X	X	X	X
Restaurant/Café	~~O~~ ✓	X	X	X	✓	X	O	X	X	O	✓	O	O	O	X	X
Retail Warehousing	O	X	X	X	O	X	X	X	X	X	X	X	X	X	X	X
School / College	O	X	~~✓~~ X	~~✓~~ X	✓	✓	X	X	X	✓	X	X	X	X	X	X
Science & Technology Based Enterprise	✓	X	X	X	O	X	X	X	X	✓	X	O	O	X	X	X
Scrap Yard	X	X	X	X	X	X	X	X	X	X	X	O	O	X	X	X
Shop	✓	O	~~O~~ X	~~O~~ X	✓	O	X	X	X	O	O	X	O	O	X	X
Take-Away	✓	X	~~O~~ X	X	O	X	X	X	X	X	O	X	X	X	X	X
Tourism Complex	O	X	X	X	✓	X	O	X	X	✓	✓	X	X	O	O	X
Training Centre	O	X	X	X	✓	O	X	X	X	✓	X	O	✓	X	X	~~X~~ O
Traveller Accommodation	O	O	O	O	X	O	X	X	X	X	X	X	X	X	O	X
Veterinary Surgery	O	~~O~~ X	~~O~~ X	~~O~~ X	✓	O	X	X	X	O	X	X	X	X	O	X
Warehousing	X	X	X	X	O	X	X	X	X	O	X	O	O	X	X	O
Water-based recreational activities	O	X	X	X	O	O	✓	O	X	O	✓	X	X	O	O	X
CHP/Waste to energy facilities	O	X	~~O~~ X	~~O~~ X	O	O	X	X	X	✓	X	✓	✓	X	O	O

Appendix 9 Implementation and Monitoring

Chapter 2. Climate Action

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP2.1 Climate Action	√		√	√		Implementation of the Climate Change Action Plan and the National Climate Change Adaptation Framework through a 'whole-of-Council' approach led by the Council's Climate Team working with the Regional Climate Action Offices / Climate Change Adaption Strategy 2019-2024	1. Review progress made on the energy emissions balance for County Clare in terms of: I.Need II.Use III.Transport Emissions 2. Incorporate results into a Data Management System. 3. No. of Climate Action awareness campaigns and public attendance.
~~CDP2.2~~ ~~Climate Change Mitigation, Adaptation and Resilience~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Implement the Council's Climate Change Adaption Strategy 2019-2024 / Development / Management, Forward Planning Unit / Climate Team / Support Ennis 2040 & aim for Ennis to become Irelands first climate adaptive town~~	~~1. No. of planning applications incorporating nature-based solutions and/or SuDS/setbacks from river within settlements.~~ ~~1. Improvement in local water quality~~ ~~2. Progress made on Strategic Objectives and Actions towards Ennis 2040's aim to make Ennis more adaptive to Climate change.~~ ~~3. No. of Climate Action awareness campaigns and public attendance~~ ~~4. No. of community based Renewable Energy projects~~
~~CDP2.3~~ ~~Severe Weather Emergency Response Plans~~	~~√~~		~~√~~	~~√~~		~~Implementation of the Council's Major Emergency Plan / Emergency Response Team and relevant Sections of the Council, Fire & Rescue, Housing, Clare Civil Defense, Roads, Water, Environment and Corporate Services~~	~~1. No. of planning applications requiring site specific flood risk assessment in settlements.~~ ~~2. No. of planning refusals listing flooding as a refusal reason within settlements.~~ ~~3. No. of settlements and local area plans that include a Strategic Flood Risk Assessment.~~ ~~4. No. of updates provided to the OPW flood hazard mapping arising from extreme weather events.~~
~~CDP2.4~~ ~~Smart Growth Initiatives~~	~~√~~		~~√~~		~~√~~	~~Rural Development / Special Projects Unit / LEO~~	~~1. (a)No. of planning applications for regeneration projects (b)No. of projects commenced/completed.~~ ~~2. (a)No. of grant/funding applications made (b)No. of successful grant applications (c)Value of funding awarded~~
CDP2.5 Decarbonisation Zone	√	√	√			Physical Development Directorate	1 Identification of a Decarbonisation zone ~~Delivery on the implementation plan.~~
CDP2.6 Flood Risk Assessment & Management	√		√	√		Development Management / Environment Section / Water Services / OPW	1. (a)No. of planning applications granted/refused within Coastal Settlement zoned areas. (b)No. of projects commenced/completed 2. (a)Impact on surface water quality (b)No. of beach closures (c)No. of blue flags lost 3. No. of exceedances of wastewater treatment emission limits
~~CDP2.7~~ ~~Coastal Erosion & Flooding~~	~~√~~		~~√~~	~~√~~	~~√~~	~~PMO / Physical Development Directorate~~	~~No. of exceedances of wastewater treatment emission limits~~
~~CDP2.8~~ ~~Floods Directive & CFRAMS~~	~~√~~		~~√~~	~~√~~	~~√~~	~~OPW / Physical Development Directorate / Development Management / Flooding Guidelines 2009~~	~~1) No. of planning applications in flood risk zones and nos. granted/refused~~ ~~2) No. of planning applications requiring Flood Impact Assessment.~~
~~CDP2.9~~ ~~Effective Collaboration to Implement River Basin Management Plans & the Water Framework Directive~~	~~√~~		~~√~~	~~√~~	~~√~~	~~OPW / Physical Development Directorate / Development Management~~	~~1) No. of community initiatives commenced/completed in the county~~ ~~2) No of planning applications requiring Construction Management Plans.~~

CDP2.10 Flood Relief Schemes	√		√	√	√	Physical Development Directorate	No. of flood schemes commenced/delivered
~~CDP2.11~~ ~~Storm Water Management~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Physical Development Directorate~~	~~No. of planning applications incorporating SuDS or other mitigation measures within settlements.~~
CDP2.12 Flood Risk Management, Green Infrastructure & Biodiversity	√	√	√	√	√	Development Management/Heritage / Rural Development / Shannon Plan & Ennis LAP	1) No. of green infrastructure plans and projects planned/commenced/completed. 2) No. of Clare County Council/OPW flood risk management measures incorporating biodiversity
~~CDP2.13~~ ~~Maintenance of Rivers~~	~~√~~	~~√~~	~~√~~			~~OPW/ Physical Development Directorate~~	~~No. of Maintenance Schemes undertaken by Municipal District Offices~~
CDP2.14 Transition to a Low Carbon Economy & Society	√	√	√	√		Physical / Social / Rural / Economic Directorates / Clare Climate Change Adaptation Strategy 2019-2024	1) Climate Change Funding (a) No. of funding applications made (b) No. of successful funding applications (c) Value of funding awarded 2) No. of planning applications that are accompanied by EIA/NIS (a) All applications (b) those with EIA/NIS 3) No. of planning applications for renewable energy and technology sources 4) No. of projects/plans relating to active travel/mobility plans/greenways etc. planned/commenced/ delivered. ~~5) No. of planning applications including/requiring an energy efficiency and climate change adaption design statement.~~ ~~6) Amount allocated in budget for improvements to energy efficiency of public buildings.~~ ~~7) Improved energy efficiency achieved in all public buildings in line with national targets.~~
CDP2.15 Renewable Transport		√	√			Physical & Economic Development Directorate / Development Management	1. No. of people walking/using public transport /other sustainable modes of travel i.e. changes of baseline data. 2. No. of planning applications for larger developments that include EV points. 3. No. of EV points included on CCC owned properties including public car parks
CDP2.16 Community Energy	√	√	√	√		Environment / Rural Development	No. of Sustainable Energy Communities assisted/planned/established in the county
CDP2.17 Renewable Heat		√	√			Development Management	No. of planning applications for District Heating projects in the county and % granted
CDP2.18 Solar Energy		√	√			Development Management	1. No. of planning applications for solar farms and % granted 2. No. of planning applications for solar panels and % granted
CDP2.19 Bioenergy		√	√			Development Management	No. of planning applications for Bio-energy projects in the county and % granted
CDP2.20 Micro-Generation		√	√			Development Management	No. of planning applications for Micro-generation projects in the county and % granted

CDP2.21 Micro Hydroelectric Generation		√	√			Development Management	No. of planning applications for Micro Hydroelectric Generation projects in the county and % granted
~~CDP2.22 Ardnacrusha Hydroelectric Power Station~~		~~√~~	~~√~~			~~Physical Development Directorate~~	~~Monitor output levels at Ardnacrusha~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP3.1 Core Strategy	√	√	√	√	√	Development Management	Residential - No of ne homes permitted/completed - No of new homes permitted considered as Compact Growth - No of houses permitted in small villages, clusters and the open countryside Commercial - Permitted floorspace as (a) Office space (b) Industrial (c) Retail (d) Bulky
CDP3.3~~1~~ Appropriate Assessment, Strategic Environmental Assessment & Strategic Flood Risk Assessment	√	√	√			Development Management / Environmental Officer	No. of planning applications that are accompanied by EIA/NIS: (a) All applications (b) those with EIA/NIS

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP4.1 Ennis	√	√	√	√	√	Consistency with Ennis Settlement Statement / Rural Development / Forward Planning Unit	1. Monitor progress made on the delivery of projects resulting from Ennis 2040 Spatial and Economic Strategy 2. Delivery of Mobility Plan for Ennis ~~3. No. of directly supported higher/further education facilities provided and no. of students using these facilities.~~ 4. Completion of the annual town centre health check 5. No. of public realm projects planned/commenced/ delivered ~~6. (a) No. of funding applications made (b) No. of successful funding applications (c) Value of funding awarded~~ ~~7. Progress on feasibility of delivering a modern family town centre living project.~~ 8. ~~Monitor the capacity of the public Wastewater treatment system~~
~~CDP4.2~~ ~~Limerick-Shannon Metropolitan Area~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Consistency with Limerick Shannon MASP / Forward Planning Unit~~	~~1. No. of active housing land management initiatives planned/commenced/ delivered~~ ~~2. No. of housing units completed in Limerick/Shannon Metropolitan Area~~ ~~3. (a) No. of RRDF/URDF/Disruptive Technologies/CAF funding applications made (b) No. of successful funding applications (c) Value of funding awarded~~ ~~4. No. of RRDF/URDF/Disruptive Technologies/CAF projects planned/commenced/ delivered~~
~~CDP4.3~~ ~~Compact Growth in the Limerick-Shannon Metropolitan Area~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Development Management~~	~~1. No. of strategic sites identified for development and the no. of design briefs underway~~ ~~2. Creation of a county wide database for vacant or underutilised brownfield sites/buildings~~
CDP4.4 Shannon	√	√	√	√	√	Consistency with Shannon town and environs LAP 2012-2018 (extended)	~~1. Completion of the Shannon Town Centre Masterplan~~ 2. Completion of a new local area plan for Shannon Town and Environs over the lifetime of the Plan 3. Monitor planning permissions granted and land availability
~~CDP4.5~~ ~~Service Towns~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Consistency with relevant Settlement Statements~~	~~1. Land use availability study completed~~ ~~2. No. of public realm projects planned/commenced/delivered~~ ~~3. No. of biodiversity projects planned/commenced/delivered~~ ~~4. Secure investment in infrastructural projects and delivery of same – Value of funding secured/No. of projects planned/commenced/delivered~~
~~CDP4.6~~ ~~Small Towns~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Consistency with relevant Settlement Statements~~	~~1. Monitor the level of investment secured for infrastructural projects and the delivery of same – Value of funding secured/No. of projects planned/commenced/delivered~~ ~~2. Land use availability study completed~~
~~CDP4.7~~ ~~Large Villages~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Consistency with relevant Settlement Statements~~	~~1. Monitor the level of investment secured for infrastructural projects and the delivery of same – Value of funding secured/No. of projects planned/commenced/delivered~~ ~~2. No. of village enhancement plans planned/commenced/ completed~~
~~CDP4.8~~ ~~Small Villages~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Consistency with relevant Settlement Statements~~	~~1. Monitor the level of investment secured for infrastructural projects and the delivery of same – Value of funding secured/No. of projects planned/commenced/delivered~~ ~~2. No. of village enhancement plans planned/commenced/ completed~~
~~CDP4.9~~ ~~Clusters~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Consistency with relevant Section of the CDP~~	~~No. of planning applications granted for dwellings~~

CDP4.10 Countryside	√	√	√	√	√	Consistency with relevant Section of the CDP	No. of planning applications received on an annual basis and location of these sites in landscape types.
~~CDP4.11~~ ~~Settlement Networks~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Rural Development~~	~~1. No. of Settlement Networks established~~ ~~2. No. of initiatives (collaboration projects) planned/commenced/ completed~~
CDP4.12 Monitoring & Implementation of Settlement Strategy	√	√	√			Development Management	No. of planning applications made and developments completed in line with the Core Strategy
~~CDP4.13~~ ~~Planned Growth of Settlements~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~Land use availability study completed~~
CDP4.14 New Single Houses in the Countryside within the 'Areas of Special Control'	√	√			√	Development Management	No. of dwellings permitted / refused in these areas and Category of need
CDP4.15 New Single Houses in the Countryside Outside the 'Areas of Special Control'	√	√			√	Development Management	No. of dwellings permitted / refused in these areas
CDP4.16 New Single Houses on Infill Sites in the Countryside	√	√			√	Development Management	No. of dwellings permitted / refused in these areas
CDP4.17 Replacement of a Substandard Habitable House in the Countryside	√	√			√	Development Management	No. of dwellings permitted / refused in these areas
CDP4.18 Refurbishment of a Derelict House/Structure in the Countryside	√	√			√	Development Management	No. of dwellings permitted / refused in these areas
CDP4.19 New Single Holiday Homes in the Countryside	√				√	Development Management	No. of planning applications for holiday homes
CDP4.20 Clare Rural House Design Guide	√	√				Forward Planning Unit	Preparation and completion of a new/updated Clare Rural Design Guide

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP5.1 Implementation of the Housing Strategy	√	√			√	Housing Section/Development Management	Progress on/delivery of objectives set out in the Housing Strategy
~~CDP5.2~~ ~~Facilitating to the Housing Needs of the Population~~	~~√~~				~~√~~	~~Housing Section/Development Management~~	~~1. No. of persons removed from the Housing Register~~ ~~2. No. of social/affordable housing units constructed/ acquired~~ ~~3. No. of persons on HAP/RAS Schemes~~ ~~4. No. of houses permitted in the county~~
~~CDP5.3~~ ~~Living in our Towns & Villages~~	~~√~~	~~√~~		~~√~~	~~√~~	~~Development Management~~	~~No. of residential units/redevelopments/upgrades permitted within settlement boundaries~~
~~CDP5.4~~ ~~Use of Public Lands~~	~~√~~				~~√~~	~~Development Management and other Relevant Sections of the Council e.g. Housing, Economic Development Property Unit, Rural Development Roads, MD Offices / National Land Agency~~	~~No of strategic sites identified/at design stage /planning stage/completed~~
~~CDP5.5~~ ~~Social & Affordable Housing~~	~~√~~	~~√~~	~~√~~		~~√~~	~~Housing Section~~	~~1. No. of social/affordable housing units constructed/acquired~~ ~~2. No. of planning applications granted with Part V housing requirement~~
CDP5.6 Emergency Accommodation	√			√	√	Housing Section	1. No. of persons provided with Emergency Accommodation 2. No. of persons permanently housed.
CDP5.7 Unfinished Development & Taking in Charge	√	√		√		Taking in Charge Team / Development Management	1. No. of unfinished developments completed 2. No. of developments taken in charge
~~CDP5.8~~ ~~Housing Mix~~	~~√~~	~~√~~			~~√~~	~~Development Management / Housing Section~~	~~No. of planning applications accompanied by a Statement of Housing Mix~~
~~CDP5.9~~ ~~Sites for Independent Development~~	~~√~~				~~√~~	~~Housing Section / Development Management~~	~~1. No of 'sites for independent development' schemes planned/commenced/completed.~~ ~~2. No of independent sites provided~~
CDP5.10 Traveller Accommodation	√				√	Implementation of the Clare County Council Traveller Accommodation Programme 2019-2024 / Housing Section / Development Management	~~1. No. of individuals/families accommodated~~ 2. Completion of a new Traveller Accommodation Plan within the lifetime of this CDP.
~~CDP5.11~~ ~~Lifelong Housing~~	~~√~~	~~√~~			~~√~~	~~Development Management / Housing~~	~~1. No. of planning applications accompanied by a Statement of Housing Mix~~ ~~2. No. of planning applications granted for nursing homes/day care developments~~
~~CDP5.12~~ ~~Accommodation for People with Disabilities~~	~~√~~				~~√~~	~~Development Management / Housing~~	~~No of funding applications approved by the Housing Section to assist people with Disabilities adapting dwellings to meet their needs.~~
~~CDP5.13~~ ~~Student Accommodation~~	~~√~~				~~√~~	~~Development Management / Projects Team~~	~~No. of planning applications granted for student accommodation~~

CDP5.14 Holiday Homes					√	Development Management	1. No. of planning applications granted for new holiday homes and express as a percentage of all new residential units permitted 2. No. of planning applications granted for holiday homes via refurbishment/ redevelopment etc. of existing units
~~CDP5.15~~ ~~Naming of Developments~~	~~√~~					~~Development Management~~	~~Ongoing via development management process~~
~~CDP5.16~~ ~~Green Infrastructure in Residential Developments~~	~~√~~	~~√~~	~~√~~	~~√~~		~~Development Management~~	~~Ongoing via development management process~~
~~CDP5.17~~ ~~Radon~~	~~√~~		~~√~~			~~Development Management~~	~~Ongoing via development management process~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP6.1 Economic Development & Enterprise	√	√		√		Development Management / Economic Development / LEO / development agencies / LECP / Failte Ireland	1. No. of new jobs created in the county 2. No. of start-ups created in the county
CDP6.2 Mid-West Regional Enterprise Plan	√	√	√	√	√	Clare County Council / LEO	Progress and delivery on actions set out in Regional Enterprise Plan
CDP6.3 Atlantic Economic Corridor	√	√		√		Economic Development	1. No. of AEC projects planned/commenced/completed 2. (a)No. of applications for AEC funding (b)No. of successful applications for AEC funding (c)Value of funding awarded
~~CDP6.4 Economic Development in Ennis~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Ennis 2040~~	~~Progress made on Actions and Strategic Objectives of Ennis 2040~~
~~CDP6.5 Development of Shannon~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Mid-West Regional Enterprise Plan 2020 & future revisions~~	~~1. No. of planning applications for upgrades to existing enterprise/industrial units.~~ ~~2. Completion of the Shannon Town Centre Masterplan~~
~~CDP6.6 Shannon International Airport~~		~~√~~		~~√~~	~~√~~	~~Clare County Council / SCP / Shannon Chamber/ Key Business Stakeholders~~	~~1. Monitor the no. of passengers using the airport.~~ ~~2. Monitor progress made on the delivery of key infrastructure and transport links e.g. N19 upgrade~~ ~~3. Monitor the progress made on the delivery of new initiatives at the airport.~~
~~CDP6.7 Higher Education Institutes & the Knowledge Economy~~	~~√~~	~~√~~			~~√~~	~~CCC / UL / LIT / NUIG / Development Management~~	~~No. of directly supported higher/further education facilities provided and no. of students using these facilities.~~
CDP6.8 University of Limerick – Clare Campus Proposed Strategic Development Zone	√	√			√	Strategic Projects Unit / Development Management / Other Stakeholders	1. Secure the designation of the Strategic Development Zone at University of Limerick - Clare Campus and progress to planning scheme 2. Progress on the reopening of the Errina Canal and the reinstatement of the riverside walkway 3. Progress on the Limerick to Scarriff blueway/greenway amenity path ~~4. Progress on the University of Limerick rail link~~
~~CDP6.9 Burlington~~		~~√~~				~~CCC / UL/ Other Stakeholders / Development Management~~	~~1. Monitor Vacancy of this site~~ ~~2. Monitor progression of mobility initiatives~~
CDP6.10 Shannon Estuary	√	√	√			Strategic Projects Unit / Strategic Integrated Framework Plan for the Shannon Estuary	1. ~~Monitor progress made on Strategic Development Locations~~ No. of Planning Applications received in relation to Strategic Development Locations. ~~2. (a) No. of funding applications for SIFP projects~~ ~~(b) No. of successful applications for SIFP projects~~ ~~(c) Value of funding awarded for SIFP projects~~
~~CDP6.11 Research & Innovation~~				~~√~~		~~CCC / 3rd Level Institutions / Business & other Stakeholders~~	~~No. of research and innovation projects planned/commenced/ completed~~
CDP6.12 Clare Digital Hub Network	√		√	√	√	Rural Development / Clare Digital Strategy 2023	No of digital hubs planned/commenced/ completed

~~CDP6.13~~ ~~High Quality Development~~	~~√~~	~~√~~				~~Development Management~~	~~No of planning applications for large scale developments (>75 employees) that required a Mobility Management Plan and No. granted/refused~~
~~CDP6.14~~ ~~Availability of Land & Infrastructure~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Clare County Development Plan / Development Management / Economic Development~~	~~1. Land use availability study completed~~ ~~2. No. of planning applications granted on enterprise and industry zoned lands~~
CDP6.15 Re-use of Brownfield Sites	√	√				Clare County Development Plan / Development Management / Economic Development	Creation of a county wide database for vacant or underutilised brownfield sites/buildings
~~CDP6.16~~ ~~Ancillary Services~~		~~√~~			~~√~~	~~Development Management~~	~~No. of planning applications granted for ancillary services in large industrial areas and business parks as a percentage of total applications received~~
~~CDP6.17~~ ~~Energy Supply~~		~~√~~	~~√~~	~~√~~		~~Development Management~~	~~No. of planning applications granted for renewable energy projects (on and offshore) as a percentage of total applications received~~
~~CDP6.18~~ ~~Green Technology~~		~~√~~	~~√~~	~~√~~		~~Development Management / Economic Development / Environment Section~~	~~No. of planning applications granted for low carbon and green tech businesses and industries in the county as a percentage of total applications received~~
~~CDP6.19~~ ~~Circular Economy~~		~~√~~	~~√~~	~~√~~		~~Development Management / LEO~~	~~No. of planning applications granted for social enterprises and the circular economy activities in the county as a percentage of total applications received~~
~~CDP6.20~~ ~~Agricultural Developments~~				~~√~~		~~Development Management / LEO / Economic Development~~	~~No. of planning applications granted for alternative farm enterprise, agri-tourism projects and farm shops in the county as a percentage of total applications received~~
~~CDP6.21~~ ~~The Food Industry~~		~~√~~		~~√~~		~~LEO / Development Management~~	~~No. of food trails planned/commenced/completed~~
~~CDP6.22~~ ~~Craft/Creative Industries~~		~~√~~		~~√~~		~~LEO / Development Management~~	~~No. of funding applications new craft enterprises in the county~~
CDP6.23 Home Based Economic Activity & Remote Working	√	√		√		LEO / Development Management	1. No. of planning applications for home based economic activity ~~2. No of digital hubs planned/commenced/completed in the county~~
~~CDP6.24~~ ~~The Film Industry~~		~~√~~				~~Arts Officer / Economic Development / LEO / Development Management~~	~~No. of film projects/enterprises in the county~~
~~CDP6.25~~ ~~Retail Developments~~	~~√~~	~~√~~			~~√~~	~~LEO / Development Management~~	~~No. of planning applications granted for retail developments and associated floor space~~
CDP6.26 Tourism	√	√	√	√		Tourism Office / Development Management	Monitor progress on and delivery of the Strategic Priorities set out in the Clare Tourism Strategy 2030

CDP6.27 Data Centres		√		√		Development Management / Economic Development	No of planning applications granted/refused permission for data centres.

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP7.1 Retail Strategy		√		√	√	CCC / LCCC / Retail Strategy for the Limerick-Shannon Metropolitan Area and County Clare	~~1. No. of planning applications for new retail units in the county~~ ~~2. No. of vacant retail units in the county brought back into use~~ 3. ~~Delivery of a Regional Retail Strategy~~ 1 Monitor the delivery of retail spaces in line with the Retail Strategy
~~CDP7.2 Retail Activity~~	~~√~~	~~√~~		~~√~~	~~√~~	~~Development Management~~	~~1. No. of planning applications granted for new retail units in town and village centres and % of overall granted~~ ~~2. No. of vacant retail units in town and village centres brought back into use~~
~~CDP7.3 Ennis Town Centre Retail Offer~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~1. No. of planning applications granted for new retail units in Ennis town centre~~ ~~2. No. of vacant retail units in Ennis town centre brought back into use~~ ~~3. Progress made on delivery of Ennis 2040's Strategic Objectives and guiding principles.~~ ~~4. Monitor findings of the annual Ennis Town Centre Health Check~~
~~CDP7.4 Neighbourhood Centres in Ennis~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~No. of planning applications granted on lands zoned Neighbourhood Centre~~
~~CDP7.5 Shannon Town Centre~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~1. No. of planning applications granted for new retail units in Shannon town centre~~ ~~2. No. of vacant retail units in Shannon town centre brought back into use~~
~~CDP7.6 Service Towns~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~1. No. of planning applications granted for new retail units in Service Towns~~ ~~2. No. of vacant retail units in Service Towns brought back into use~~
~~CDP7.7 Small Towns~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~1. No. of planning applications granted for new retail units in Small Towns~~ ~~2. No. of vacant retail units in Small Towns brought back into use~~
~~CDP7.8 Large Villages~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~1. No. of planning applications granted for new retail units in village centres~~ ~~2. No. of vacant retail units in village centres brought back into use~~
~~CDP7.9 Small Villages~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~1. No. of planning applications granted for new retail units in village centres~~ ~~2. No. of vacant retail units in village centres brought back into use~~
~~CDP7.10 Retail uses in Rural Areas~~	~~√~~	~~√~~			~~√~~	~~Development Management~~	~~No. of planning applications granted for retail developments in rural areas.~~
~~CDP7.11 Over-Concentration of Uses~~						~~Development Management~~	~~No. of planning applications for retail development refused due to over-concentration of use~~
~~CDP7.12 Town Centre Accessibility & Mobility~~	~~√~~	~~√~~			~~√~~	~~Development Management / Economic Development / MD Offices~~	~~1. No of planning applications requiring a Mobility Management Plan and No. granted/refused~~ ~~2. No. of public realm initiatives/projects planned/commenced/ completed~~

CDP7.13 Retail Health Checks	√			√	√	Forward Planning Unit	No. of retail health checks carried out
~~CDP7.14~~ ~~Shop Fronts~~	~~√~~					~~Development Management~~	~~Ongoing via development management process~~
~~CDP7.15~~ ~~Evening & Late Night Uses~~	~~√~~	~~√~~				~~Development Management~~	~~1. No. of planning applications granted for evening/late night commercial, retail or entertainment uses~~ ~~2. No. of event licences permitted~~
CDP7.16 Leisure & Entertainment Facilities	√	√				Development Management	No. of planning applications granted for leisure and entertainment facilities
CDP7.17 Edge-of-Centre Retail Development	√	√				Development Management	No. of planning applications where a sequential test was utilised to assess the impact on existing retail services.
~~CDP7.18~~ ~~Retail Parks/Retail Warehousing~~	~~√~~	~~√~~				~~Development Management~~	~~1. No. of new bulky comparison retail developments permitted in Ennis~~ ~~2. No. of planning applications granted for new retail warehouse developments in Shannon~~
~~CDP7.19~~ ~~Tourism-Related Retail~~	~~√~~	~~√~~				~~Development Management~~	~~No. of planning applications granted for tourism-related retail developments in the county~~
~~CDP7.20~~ ~~Ancillary Retailing~~	~~√~~	~~√~~				~~Development Management~~	~~No. of planning applications granted for retail developments ancillary to industrial and commercial businesses outside of town centres~~
~~CDP7.21~~ ~~Petrol Filling Stations~~	~~√~~	~~√~~				~~Development Management~~	~~No. of planning applications granted for retail developments ancillary to petrol filling stations in the county~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
~~CDP8.1 Rural Economic Development~~	~~√~~	~~√~~		~~√~~	~~√~~	~~Rural Development Directorate~~	~~1. No. of town and village centre RRDF/URDF/Disruptive Technologies/CAF projects planned/commenced/delivered 2. No. of town and village centre public realm projects planned/commenced/delivered 3. No. of town and village renewal scheme initiatives planned/commenced/delivered 4. (a) No. of funding applications made (b) No. of successful funding applications (c) Value of funding awarded~~
~~CDP8.2 Rural Innovation, Enterprise & Employment~~		~~√~~	~~√~~	~~√~~		~~Development Management~~	~~1. Creation of a county wide database for derelict/vacant or underutilised brownfield sites/buildings 2. No. of planning applications for new rural and farm-related enterprises~~
CDP8.3 Alternative Farm Enterprises		√	√	√		Development Management	1. No. of planning applications for new rural and farm-related enterprises 2. No. of planning applications for farm-based renewable energy technologies
~~CDP8.4 Agriculture~~		~~√~~				~~Development Management / LEO / Tourism~~	~~1. No. of planning applications for developments for farm diversification including new food-based enterprises and tourism activities 2. No. of farmers markets in the county~~
~~CDP8.5 Rural Services~~	~~√~~	~~√~~			~~√~~	~~Development Management/ LEO~~	~~1. No. of planning applications for local services and shops in the rural areas 2. Creation of a county wide database for derelict/vacant or underutilised brownfield sites/buildings~~
CDP8.6 Rural Transport	√	√	√		√	Physical Development Directorate / National 'Action Plan for Rural Development'	1. Expansion of the Local Link Rural Transport Programme, routes/passenger nos. 2. No. of new rural transportation initiatives in the county
CDP8.7 Rural Broadband	√	√	√	√	√	Rural Development Directorate / Clare Digital Strategy	1. Monitor progress on the delivery of the National Broadband Plan 2. Monitor progress on the delivery of Broadband Connection Points 3. No. of DigiClare Digital Hubs planned/commenced/ delivered
~~CDP8.8 Natural Resources~~		~~√~~	~~√~~	~~√~~		~~Development Management~~	~~Ongoing via development management process~~
~~CDP8.9 Non-Commercial Fishing~~	~~√~~					~~Development Management~~	~~No. of planning applications for new non-commercial fishing activities and complementary on-shore hospitality facilities/services in coastal communities~~
CDP8.10 Forestry		√	√			Coilte / Planning	1. Area of forestry planted lands in the county 2. No. of planning applications for new ancillary forestry enterprises
CDP8.11 Bio-Energy		√	√			Development Management	No of planning applications for new bio-energy developments and associated rural enterprises in the county
CDP8.12 Renewable Energy Development		√	√			Development Management	No. of planning applications granted for renewable energy developments (on and offshore)
~~CDP8.13 Unconventional Gas Exploration & Extraction~~			~~√~~			~~Development Management~~	~~No. of unconventional oil/gas projects in operations in the county.~~
~~CDP8.14~~						~~Development Management / Enforcement~~	~~No. of planning applications granted/refused for quarrying and mining~~

~~Minerals, Mining & Quarrying~~							

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP9.1 County Clare Tourism Strategy	√			√		Rural Development Directorate / Tourism Office / County Clare Tourism Strategy 2030	Progress on and delivery of the Strategic Priorities set out in the Clare Tourism Strategy 2030
~~CDP9.2 Promotion of Tourism in County Clare~~	~~√~~			~~√~~		~~Clare Tourism and the Recovery Task Force / other stakeholders~~	~~1. No. of planning applications for new tourism developments and facilities~~ ~~2. No. of new tourism projects/initiatives planned/commenced/delivered~~
~~CDP9.3 Integrated Tourism Products~~	~~√~~	~~√~~		~~√~~	~~√~~	~~Rural Development Directorate / Tourism~~	~~No. of new integrated tourism products in the county~~
~~CDP9.4 Tourist Developments & Tourist Facilities~~	~~√~~			~~√~~	~~√~~	~~Development management~~	~~No. of planning applications granted for new tourism developments and facilities~~
~~CDP9.5 Visitor Accommodation~~	~~√~~				~~√~~	~~Development management~~	~~No. of planning applications granted for visitor accommodation and camper van/touring caravan etc. facilities~~
CDP9.6 Tourism Corridors		√			√	Tourism Office / other stakeholders	1. Progress on and delivery of key tourism-related plans and projects such as the Tourism Masterplan for the River Shannon and the Doolin Pier Masterplan and visitor services centre at Doolin Pier. ~~2. (a) No. of funding applications made for tourism plans and projects~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~
~~CDP9.7 Business Tourism~~	~~√~~			~~√~~		~~Development management~~	~~No. of planning applications granted for new conference facilities and/or the expansion/upgrade of existing conference facilities~~
~~CDP9.8 Activity & Adventure Tourism~~	~~√~~					~~Tourism Office / other stakeholders / Development management~~	~~1. No. of planning applications granted for new water-related facilities/recreational routes in the county~~ ~~2. No. of new water sports, surfing, sailing and water-related facilities events in the county~~ ~~3. No. of new recreational routes planned/commenced/completed in the county~~
~~CDP9.9 Educational Tourism~~	~~√~~				~~√~~	~~Tourism Office / Development management~~	~~No. of planning applications granted for educational tourism facilities in the county~~
~~CDP9.10 Rural Tourism & Forestry Tourism~~	~~√~~	~~√~~				~~Development management~~	~~1. No. of planning applications granted for rural tourism developments such as open farms, farm crafts centres etc. in the county and percentage located within existing buildings.~~ ~~2. No. of planning applications granted for forestry-related visitor accommodation and recreational facilities.~~
~~CDP9.11 Arts, Crafts 7 Food Tourism~~	~~√~~	~~√~~				~~Arts Office / Development management~~	~~No. of planning applications granted for new arts, crafts and food sector enterprises in the county~~
~~CDP9.12 Coastal Tourism~~	~~√~~	~~√~~				~~Development management~~	~~1. No. of planning applications granted for new water sports and water-related facilities in the county~~ ~~2. No. of Blue Flags awarded in the county~~

~~CDP9.13 Lakeland & Waterway Tourism~~	~~√~~	~~√~~				~~Tourism Office / Development management~~	~~No. of planning applications granted for new tourism activities in lakeside locations and along waterways in the county~~
~~CDP9.14 Urban Tourism~~	~~√~~	~~√~~				~~Tourism Office / Development management~~	~~1. No. of public realm projects planned/commenced/ delivered~~ ~~2. (a) No. of public realm funding applications made~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~ ~~3. Creation of a county wide database for vacant or underutilised brownfield sites/buildings~~
~~CDP9.15 Festivals & Events~~	~~√~~					~~Tourism Office / Development management~~	~~1. No. of established and new festivals and sporting events taking place in the county~~ ~~2. (a) No. of funding applications made for festivals and sporting events~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~
~~CDP9.16 Heritage & Cultural Tourism~~	~~√~~	~~√~~				~~Heritage Office / Heritage Council, the Arts Council, local stakeholders / Development management~~	~~No. of planning applications granted for new/upgraded heritage and cultural tourism developments in the county~~
~~CDP9.17 Sustainable & Responsible Tourism~~	~~√~~	~~√~~	~~√~~			~~Tourism Office / Development management~~	~~No. of new sustainable and responsible tourism initiatives in the county~~
~~CDP9.18 Niche Tourism~~	~~√~~	~~√~~				~~Tourism Office / Development management~~	~~No. of planning applications granted for new niche tourism developments in the county~~
~~CDP9.19 Accessible Tourism~~	~~√~~				~~√~~	~~Tourism Office / Development management~~	~~No. of planning applications granted for upgrading of access to existing tourist facilities and activities~~
~~CDP9.20 Signage Management~~	~~√~~				~~√~~	~~Tourism Office / Development management~~	~~No. of tourism signage schemes (new/upgrade to existing) planned/commenced /completed in the county~~
CDP9.21 Tourism in Ennis & its Environs		√				Tourism Office / Development management	~~1. No. of planning applications granted for new tourism developments, facilities and infrastructure in Ennis~~ 2. Monitor Purple Flag accreditation for Ennis
CDP9.22 Tourism in South Clare & the Limerick-Shannon Metropolitan Area		√				Tourism Office / Development management	~~1. No. of planning applications granted for new tourism developments, facilities and infrastructure in the Limerick-Shannon Metropolitan Area~~ 2. Monitor progress on and delivery of a flagship international-scale tourism project in Bunratty
CDP9.23 Tourism in East Clare		√				Tourism Office / Development management	~~1. No. of planning applications granted for new tourism developments, facilities and infrastructure in East Clare~~ 2. Progress on the implementation of the Inis Cealtra (Holy Island) Visitor Management and Sustainable Tourism Development Plan 3. Progress on the implementation of the Shannon Tourism Masterplan 2020-2030
CDP9.24 Tourism in North Clare & The Burren		√				Tourism Office / Development management	1. Monitor progress on the implementation of the Cliffs of Moher Strategy 2040 ~~2. No. of planning applications granted for new tourism developments, facilities and infrastructure in North Clare~~ 3. Progress on and completion of the Corofin Streetscape Enhancement Strategy
CDP9.25 Tourism in West Clare		√				Tourism Office / Development management	~~1. No. of planning applications granted for new tourism developments, facilities and infrastructure in West Clare~~ 2. Progress made on the delivery of improved tourist experience at key sites such as Vandeleur Gardens, Loop Head Lighthouse etc.
CDP9.26	√	√	√		√	Tourism Office / Development management	Progress on and delivery of the West Clare Railway Greenway

West Clare Railway Greenway							
~~CDP9.27~~ ~~Tourism & the Islands~~						~~Tourism Office / Development management~~	~~No. of planning applications granted for new tourism developments, facilities and infrastructure to support tourism on our islands~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
~~CDP10.1 Sustainable Communities~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Clare County Council Key Stakeholders~~	~~No. of planning applications granted for community facilities~~
CDP10.2 Local Community Development Committee	√	√			√	Clare County Council CLDC	1. Progress on actions and stakeholder initiatives identified in the Clare LECP 2. (a)No. of funding applications made for regeneration initiatives in disadvantaged areas of the county (b) No. of successful funding applications (c) Value of funding awarded 3. No. of planning applications granted for new social enterprises in the county
~~CDP10.3 Voluntary & Community Groups~~					~~√~~	~~Clare County Council Clare PPN Voluntary Organisations~~	~~No. of collaborative projects/initiatives planned/commenced/delivered with voluntary and community groups~~
CDP10.4 Diverse & Socially Inclusive Society	√				√	Clare County Council Key Stakeholders	Progress on and delivery of Actions set out in the Migrant Integration Strategy
~~CDP10.5 Inclusivity & Equal Access~~	~~√~~				~~√~~	~~Clare County Council Representative Groups for Persons with Disabilities~~	~~No of projects/initiatives that support universal accessibility~~
CDP10.6 Age-Friendly County	√				√	Clare County Council Age Friendly Clare Development Officer Old Peoples Council HSE An Garda Siochána	Progress on and delivery of Actions set out in the Clare Age Friendly Strategy
CDP10.7 Community Facilities	√				√	Clare County Council Community Groups	1. Completion of the inventory of community, social and cultural facilities 2. No. of planning applications granted for new community facilities in the county
CDP10.8 Community Gardens & Allotments	√		√		√	Clare County Council Community Groups	No. of community gardens and allotments provided in the county
~~CDP10.9 Arts & Cultural Development~~	~~√~~				~~√~~	~~Clare County Council Arts Council Stakeholders~~	~~1. Monitor the range of new arts and cultural events taking place in the county~~ ~~2. No. of new workspaces/hubs and display facilities in the county~~
~~CDP10.10 Physical Recreation & Active Living~~	~~√~~		~~√~~	~~√~~	~~√~~	~~Clare County Council Clare Sports Partnership~~	~~No. of new recreational facilities and amenities in the county~~
CDP10.11 Recreational Routes	√		√		√	Clare County Council Irish Rail Community Groups	1. Progress on and delivery of new and upgraded recreational routes and associated infrastructure in the county 2. Completion of heritage audits for the county
~~CDP10.12 Countryside Recreation~~	~~√~~				~~√~~	~~Clare County Council CLDC Community stakeholders~~	~~No. new/upgraded walking routes delivered in the County.~~
~~CDP10.13 Public Rights of Way~~					~~√~~	~~Clare County Council – Development Management and Planning Policy~~	~~Ongoing via development management process~~
~~CDP10.14 Play Facilities~~	~~√~~				~~√~~	~~Clare County Council Community Groups~~	~~No. of planning applications granted/Section 5 exempted development applications for play facilities in the county~~

~~CDP10.15~~ ~~Childcare Facilities~~	~~√~~				~~√~~	~~Clare County Council~~ ~~Childcare Committee~~ ~~Operators~~	~~No. of planning applications granted for childcare facilities in the county~~
CDP10.16 Primary & Secondary Education	√				√	Department of Education	No. of planning applications granted for primary and secondary educational facilities in the county
CDP10.17 Higher Education Institutes	√				√	Department of Education Clare county Council	~~1. No. of planning applications granted for third-level educational facilities in the county~~ ~~2. No. of directly supported higher/further education facilities provided and no. of students using these facilities.~~ 3. Progress on and delivery of a Regional Design Centre
~~CDP10.18~~ ~~Further Education & Lifelong Learning~~	~~√~~				~~√~~	~~Limerick Education Training Board~~	~~No. of planning applications granted for new training facilities~~
~~CDP10.l9~~ ~~Dual Use Facilities~~					~~√~~	~~Department of Education~~ ~~Local Schools~~ ~~Community Groups~~	~~No. of planning applications granted for shared/dual use facilities in the county~~
CDP10.20 Health Services	√				√	HSE	No. of planning applications granted for healthcare facilities in the county
~~CDP10.21~~ ~~Air Ambulance Facilities~~	~~√~~				~~√~~	~~National Coastguard~~	~~No. of new air ambulance landing locations identified in the county~~
CDP10.22 Libraries	√				√	Clare county Council	Completion and operation of new library facilities in Ennis
~~CDP10.23~~ ~~Burial Grounds/Crematoria~~					~~√~~	~~Clare County Council~~	~~1. No. of planning applications granted for burial grounds/crematoria in the county~~ ~~2. Funding supports available to assist communities for burial ground maintenance/extensions~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP11.1 Regional Spatial & Economic Strategy	√	√	√	√	√	Economic, Physical, Social and Rural Directorates Infrastructure Providers	Monitor the progress made on the delivery of infrastructural projects identified in the RSES
CDP11.2 Smarter Travel	√		√		√	Physical Directorate and Municipal Districts	Monitor progress made on the delivery of Smart Travel projects in the county
CDP11.3 Limerick-Shannon Metropolitan Area Transport Strategy & Local Transport Planning	√	√	√		√	Economic, Physical, Social and Rural Directorates	1. Progress on and delivery of Actions of the Limerick Shannon Metropolitan Area Transport Strategy 2. Progress on and delivery of Actions of the Local Transport Strategy for Ennis and Environs
~~CDP11.4~~ ~~Active Travel Towns~~	~~√~~		~~√~~		~~√~~	~~Economic, Physical, Social and Rural Directorates~~	~~Progress on and delivery of Actions of the Active Travel Towns Programme in Ennis~~
CDP11.5 Walking & Cycling	√		√		√	Physical and Rural Directorate	1. No. of identified cycle networks progressed/delivered 2. No. of long-distance cycling and walking routes identified in the county and progress on/deliver of same 3. Progress on and delivery of West Clare Railway Greenway ~~4. No. of new/upgraded walking and cycle routes/trails in the county~~
CDP11.6 Rail Network	√	√	√		√	Physical and Rural Directorate Iarnród Éireann	1. Progress on opening/reinstatement of railway stations on the Western Railway Corridor 2. Monitor the area of land zoned for railway uses 3. Monitor the progress made on the Identification of a resolution to periodic flooding of the Ennis – Limerick rail line
CDP11.7 Shannon Rail Link	√	√	√		√	Physical Directorate, TII, NRA, Iarnród Éireann	1. Monitor progress made on and delivery of the N19 National Road upgrade to Shannon International Airport 2. Monitor progress made on the review of the existing feasibility study relating to the Shannon Rail Link
CDP11.8 Bus Transport	√	√	√		√	Physical Directorate, TII, NRA, Bus Service Providers, Ennis MD	1. No. of new bus routes in the county 2. No. of projects for new/upgraded bus facilities and associated infrastructure planned/commenced/ delivered in the county
CDP11.9 Transport Assets & Multi-Modal Travel Integration	√	√	√		√	Ennis 2040 Economic, Physical, Social and Rural Directorates	1. Progress on the development of Ennis as a bus and rail connecting hub ~~2. No. of projects under the Minor Works Programme incorporating climate change considerations~~
CDP11.10 EV & CNG Infrastructure & Smart Mobility			√			Economic, Physical, Social and Rural Directorates	1. No. of new Electric Vehicle charging facilities in the county 2. No. of planning applications incorporating EV charging facilities 3. Progress on the development of the Future Mobility Campus in Shannon
~~CDP11.11~~ ~~Motorways, National Roads & Strategic Inter-Urban Roads~~	~~√~~				~~√~~	~~Economic, Physical, Social and Rural Directorates~~	~~Progress on and delivery of identified projects relating to motorways, national roads and strategic inter-urban roads.~~
CDP11 12 Motorway Service & Rest Areas	√					Economic, Physical, Social and Rural Directorates NTA	Progress on and delivery of a Type 1 service area at the identified location on the M18
~~CDP11.13~~ ~~Direct Access onto National Roads~~						~~Economic Directorate~~	~~No of planning applications granted/refused where direct access off the national road network Is proposed~~

~~CDP11.14~~ ~~Development of Strategic Regional Roads~~						~~Economic Directorate~~	~~1. No. of initiatives to improve/upgrade strategic regional road planned/commenced/ delivered~~ ~~2. No of planning applications granted/refused where direct access off a strategic regional road is proposed~~
~~CDP11.15~~ ~~Proposed Projects identified for Future Development~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Physical Directorate~~	~~1. No. of identified projects progressed/delivered~~ ~~2. Progress on and delivery of a Masterplan for Parteen including the route of the proposed LNDR~~ ~~3. Length of riparian zone retained along the route of the LNDR and University Link Road, canals and waterways~~
~~CDP11.16~~ ~~Regional & Local Road Developments~~	~~√~~			~~√~~	~~√~~	~~Physical Directorate~~	~~No. of infrastructural projects on regional and local roads planned/commenced/delivered~~
~~CDP11.17~~ ~~Environmental Considerations in Road Construction Projects~~	~~√~~		~~√~~			~~Physical Directorate~~	~~No of road construction projects incorporating environmental considerations~~
~~CDP11.18~~ ~~Design Manual for Urban Roads & Streets (DMURS)~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Economic Directorate~~	~~Ongoing via development management and Part VIII~~
CDP11.19 Shannon International Airport		√				Economic Task Force Shannon International Airport Economic, Physical, Social and Rural Directorates Department of Transport, Adjoining Local Authorities, Airport Authorities, TII, the NTA	1. Progress on and completion of an Airport Strategy for the Southern Region 2. Progress on the further development of the International Aviation Services Centre 3. Progress on and completion of the upgrade to the Shannon Flood Relief Embankments 4. No. of planning applications granted/refused in Red Safety Zones and Public Safety Zones
~~CDP11.20~~ ~~Public Rights of Way~~					~~√~~	~~Economic, Physical, Social and Rural Directorates~~	~~No. of existing Public Rights of Way identified in the county~~
CDP11.21 Water-Bourne Transport	√				√	Economic, Physical, Social and Rural Directorates	1. No. of existing and new ferry routes/services in the county 2. Progress on and establishment of a ferry or water taxi service between North Clare and Galway City ~~3. No. of planning applications granted/refused for new passenger services and amenities related to/associated with ferry services~~ 4. Progress on and completion of the Doolin Pier Masterplan
CDP11.22 Ports & Harbours	√		√		√	Economic, Physical, Social and Rural Directorates Shannon Foynes Port Company	1. No. of marine related projects progressed at Cahiracon, Kilrush and Moneypoint planned/commenced/completed 2. Preparation and completion of a Regional Ports and Harbour Strategy for the Southern Region
CDP11.23 Shannon Foynes Port	√	√	√	√	√	Co-ordination with relevant stakeholders SIFP steering group.	Progress on and delivery of infrastructure projects identified in the Shannon Foynes Port Company Infrastructure Development Programme
~~CDP11.24~~ ~~Freight~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Co-ordination with relevant stakeholders~~ ~~SIFP steering group.~~	~~1. Preparation and completion of a Regional Freight Strategy for the Southern Region~~ ~~2. No. of planning applications for freight related developments located in proximity to the national road network~~
~~CDP11.25~~ ~~Directional Signage~~	~~√~~				~~√~~	~~TII, NTA , Clare County Council~~	~~No. of schemes/initiatives for new/upgraded directional signage in the county~~

CDP11.26 Water Framework Directive & River Basin Management			√	√		Irish Water Clare County Council Inland Fisheries OPW	1. Progress on and delivery of actions identified in the River Basin Management Plan 2022-2027 2. No. of water bodies achieving improved water quality status/Poor water quality in the county 3. No. of Priority Areas, Blue Dot catchments retaining High Water Quality/achieving High water quality in the county
CDP11.27 Water Resources		√				Irish Water Clare County Council Inland Fisheries OPW	1. Progress on and completion of Drinking Water Protection Plans 2. Ongoing via development management process - protection of groundwater sources, rivers and their habitats etc
CDP11.28 Strategic Water Supply Projects	√	√				Irish Water Clare County Council Inland Fisheries OPW	1. No. of IW water supply projects planned/commenced/completed in the county 2. No. of interactions by Clare County Council relating to IW proposals to abstract water from Lough Derg
~~CDP11.29~~ ~~Water Services~~		~~√~~				~~Clare County Council~~ ~~Water Services~~ ~~Irish Water~~	~~Ongoing via development management process and development plan/local area plan process~~
CDP11.30 Water Supply	√					Irish Water Water Services	1. Progress on and completion of IW Investment Plans 2. Cubic metres (m^3) of water leakage reductions in the county's water supply 3. No. of planning applications which include rainwater harvesting facilities/water conservation measures
~~CDP11.31~~ ~~Ennis & Environs Water Supply~~	~~√~~					~~Irish Water~~ ~~Water Services~~	~~1. Cubic metres (m^3) of water leakage reductions in water supply in the Ennis and Environs area~~ ~~2. Progress on investigations into the use of Pouladower Spring to supply water to Ennis~~ ~~3. No. of planning applications granted/refused within 200m of Drumcliffe Springs~~
CDP11.32 Wastewater Treatment & Disposal	√					Irish Water Water Services	1. Progress on and completion of IW Investment Plans 2. Ongoing via the development management process – development of treatment systems and protection of the environment
~~CDP11.33~~ ~~Strategic Wastewater Treatment Projects~~	~~√~~					~~Irish Water~~ ~~Water Services~~	~~No. of new/upgrades to public wastewater system in the county planned/commenced/delivered in the county~~
CDP11.34 Rural Wastewater Treatment Programmes	√					Irish Water Water Services	1. No. of new/upgrades to public wastewater system in the county planned/commenced/delivered in rural areas 2. No. of serviced sites delivered in the county ~~3. No. of new private wastewater treatment systems permitted/refused in the county~~
~~CDP11.35~~ ~~Waste Management~~	~~√~~					~~Clare County Council~~ ~~Private Operators~~	~~1. No. of planning applications granted/refused for new enterprises/developments relating to the circular economy~~ ~~2. No. of planning applications granted/refused for new/innovative waste recycling facilities in the county~~ ~~3. No. of planning applications for former landfill sites repurposed for community or recreational use.~~
~~CDP11.36~~ ~~Waste Transfer & Recovery Facilities~~	~~√~~		~~√~~			~~Clare County Council~~ ~~Private Operators~~	~~No. of planning applications granted/refused for waste transfer and recovery developments~~

CDP11.37 Litter Management	√					Clare County Council Environment Section	Progress on and delivery of Actions identified in the Clare County Litter Management Plan
~~CDP11.38~~ ~~Construction & Demolition Waste~~	~~√~~					~~Clare County Council~~ ~~Construction Industry~~ ~~Private Operators~~	~~1. No. of planning applications granted/refused and accompanied by construction and demolition waste management plans~~ ~~2. No. of planning applications granted/refused and accompanied by construction and demolition waste management plans~~
~~CDP11.39~~ ~~Agricultural Waste~~	~~√~~					~~Department of Agriculture~~ ~~Farming Community~~	~~Ongoing via the development management process~~
~~CDP11.40~~ ~~Noise Pollution~~	~~√~~					~~Clare County Council Roads & Environment~~ ~~An Garda Siochána~~	~~Ongoing via the development management process~~
CDP11.41 Air Quality	√					Clare County Council Environment Section	1. Monitor improvements or a decline in air quality in the county ~~2. Ongoing via the development management and enforcement processes~~
~~CDP11.42~~ ~~Light Pollution~~	~~√~~					~~Clare County Council~~ ~~Environment Section~~	~~Ongoing via the development management and enforcement processes~~
~~CDP11.43~~ ~~SEVESO III Directive~~	~~√~~			~~√~~		~~Health and Safety Authority~~	~~Ongoing via the development management and enforcement processes~~
CDP11.44 Energy Security	√			√		EirGrid ESB Clare County Council	Monitor progress made towards the sustainable redevelopment of Moneypoint Power Station:
~~CDP11.45~~ ~~Electricity Networks~~	~~√~~	~~√~~	~~√~~	~~√~~		~~Co-ordination with relevant stakeholders~~	~~1. Monitor the number of new connections to the electricity network~~ ~~2. Monitor the expansion/upgrading of the existing electricity network (capacity/km^2) in the county~~ ~~3. Monitor the number of planning applications granted/refused for renewable energy developments~~ ~~4. Monitor the progress made on meeting/exceeding the county's minimum Renewable Energy Target~~
~~CDP11.46~~ ~~Gas Networks~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Co-ordination with relevant stakeholders~~	~~1. Monitor the expansion/upgrading of the existing gas network (capacity/km^2) in the county~~ ~~2. Monitor the no. of planning applications granted/refused for renewable gas/CNG related developments~~ ~~3. Monitor the no. of strategic energy projects planned/commenced/completed in the county~~ ~~4. Monitor progress made on meeting/exceeding the county's minimum Renewable Energy Target~~
CDP11.47 Renewable Energy	√	√	√	√	√	Co-ordination with relevant stakeholders	1. No. of planning applications granted/refused for renewable energy developments including wind energy developments 2. Monitor progress made on the completion of a new Wind Energy Strategy for County Clare 3. Monitor initiatives promoting/marketing the county as a leader in renewable energy provision planned/commenced/completed
CDP11.48 Renewable Energy Strategy	√	√	√	√	√	Co-ordination with relevant stakeholders	1. No. of planning applications granted/refused for renewable energy developments (on-shore and off-shore) 2. Monitor progress made on achieving key targets set out in the Clare Renewable Energy Strategy 2023-2030 ~~3. Monitor progress made on the preparation and completion of a regional renewable energy strategy~~
~~CDP11.49~~ ~~Renewable Offshore Energy~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Co-ordination with relevant stakeholders~~	~~1. No. of planning applications granted/refused for off-shore renewable energy developments~~ ~~2. No. of off-shore renewable energy projects planned/commenced/completed in the county~~

~~CDP.11.50~~ ~~Power Stations & Renewable Energy~~	~~√~~	~~√~~	~~√~~	~~√~~		~~Co-ordination with relevant stakeholders~~	~~Monitor progress made towards the sustainable redevelopment of Moneypoint Power Station:~~
~~CDP11.51~~ ~~Energy Storage~~		~~√~~	~~√~~	~~√~~		~~Development Management~~	~~1. No. of planning applications granted/refused for energy storage facilities and associated infrastructure~~ ~~2. No. of initiatives/pilot projects relating to energy storage and carbon capture planned/commenced/completed in the county~~
~~CDP11.52~~ ~~Energy Efficiency & Conservation~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Co-ordination with relevant stakeholders~~	~~Ongoing via the development management process~~
CDP11.53 Digital Strategy	√	√	√	√	√	Co-ordination with relevant stakeholders Economic and Rural Directorate	1. Monitor progress on and delivery of Actions set out in the Clare Digital Strategy 2023 ~~2. No. of new Clare Digi-hubs and no. of users using these facilities~~
~~CDP11.54~~ ~~Broadband Connectivity~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Co-ordination with relevant stakeholders~~ ~~Development Management~~	~~1. Monitor the provision of additional broadband capacity in the county~~ ~~2. Monitor progress made on and delivery of Actions on foot of the Clare Digital Strategy 2023~~ ~~3. Monitor the no. of projects/initiatives relating to the delivery of digital infrastructure ducting, dark fibre infrastructure and upgraded MAN planned/commenced/completed~~
CDP11.55 Telecommunications Infrastructure	√		√	√	√	Co-ordination with relevant stakeholders Development Management	No of planning applications granted/refused for digital and mobile infrastructure

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP12.1 Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary		√	√	√		Clare Coco/SIFP Steering Group	Monitor the progress made on and delivery of objectives of the SIFP
~~CDP12.2~~ ~~Integrated Development of the Shannon Estuary~~		~~√~~	~~√~~	~~√~~		~~Clare Coco/SIFP Steering Group~~	~~1. No. of SIFP Steering Group meetings held~~ ~~2. No. of sub-group meetings (environmental and marketing) held~~ ~~3. Quantity of baseline data collated/ collected~~
~~CDP12.3~~ ~~Marine-Related Industry/Large-Scale Industry on the Estuary~~		~~√~~		~~√~~		~~Clare Coco/SIFP Steering Group~~	~~No. of marine related projects progressed within the Shannon Estuary~~
~~CDP12.4~~ ~~Strategic Development Locations~~		~~√~~				~~Clare Coco/SIFP Steering Group~~	~~No. of marine related projects progressed at the Strategic Development Locations of Moneypoint and Cahiracon planned/commenced/ completed~~
~~CDP12.5~~ ~~Strategic Development Location A – Inishmurry/Cahiracon~~		~~√~~	~~√~~	~~√~~		~~Clare Coco/SIFP Steering Group~~	~~No. and diversity of projects at Strategic Development Location Inishmurry/Cahiracon planned/commenced/ completed~~
~~CDP12.6~~ ~~Strategic Development Location B – Moneypoint~~		~~√~~	~~√~~	~~√~~		~~Clare Coco/SIFP Steering Group/ESB~~	~~Monitor progress made towards the sustainable redevelopment of Moneypoint Power Station:~~
~~CDP12.7~~ ~~Shipping & Navigation~~		~~√~~				~~Clare Coco/SIFP Steering Group/Shannon Foynes Port Company~~	~~1. Monitor progress made in the no. of renewable energy projects planned/commenced/completed~~ ~~2. Monitor shipping nos. on the estuary~~
~~CDP12.8~~ ~~Harnessing the Energy Resources of the Shannon Estuary~~		~~√~~	~~√~~	~~√~~		~~Clare Coco/SIFP Steering Group/ESB~~	~~Monitor progress made towards developing renewable energy projects along the Shannon Estuary~~ ~~(a) Scoping~~ ~~(b) Site investigations~~ ~~(c) Licences~~
CDP12.9 Promoting Tourism, Recreation & Leisure around the Shannon Estuary	√	√			√	Clare Tourism Strtaegy/ClareCoco Failte Ireland	No. of new tourism, recreation and leisure projects/businesses around the Shannon Estuary
CDP12.10 Cruise Ship Industry		√				Clare Coco/Shannon Foynes Port Company/ SIFP steering group	Monitor the no. of cruise ships using the Shannon Estuary
~~CDP12.11~~ ~~Estuary Settlements~~	~~√~~	~~√~~		~~√~~	~~√~~	~~Development Management~~	~~Monitor the number of collaborative projects underway along the Shannon Estuary~~
~~CDP12.12~~ ~~Aviation & the Shannon Estuary~~	~~√~~			~~√~~	~~√~~	~~Clare Tourism Strategy/ Development Management~~	~~Monitor passenger and freight Nos.~~
~~CDP12.13~~ ~~Commercial Fishing/Aquaculture~~	~~√~~	~~√~~		~~√~~	~~√~~	~~LEO/ Development Management~~	~~Monitor the no. of new aquaculture licences.~~
CDP12.14 Maritime Training Centre	√	√	√	√	√	Economic Directorate	Monitor the delivery of the Maritime Training Centre

~~CDP12.15~~ ~~Building on the Shannon Estuary as an Environmental Asset~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~CCC~~	~~1. Monitor progress made on the development of an Integrated Environmental Management Plan for the Shannon Estuary~~ ~~2. Monitor progress made on the delivery of a site-specific conservation management plan for the Lower Rover Shannon cSAC~~
~~CDP12.16~~ ~~Marina Developments~~	~~√~~	~~√~~		~~√~~	~~√~~	~~Development Management~~	~~Monitor the no. of planning applications granted for Marina developments along the Shannon Estuary~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
~~CDP13.1 Environmental Designations in Coastal Areas~~	~~√~~	~~√~~	~~√~~	~~√~~		~~SIFP, Clare MEZ~~	~~No. of maritime projects planned/commenced/ completed~~
~~CDP13.2 Management Structures~~	~~√~~	~~√~~	~~√~~			~~Department of Agriculture, Food and the Marine, Department of Environment, Maritime Area Regulatory Authority,~~	~~No. of Foreshore License consents and Maritime Area Consents and licenses granted~~
~~CDP13.3 Maritime Spatial Planning~~	~~√~~	~~√~~	~~√~~			~~Development Management~~	~~1. No. of local plans, Coastal Management Plans and local Integrated Coastal Management plans prepared~~ ~~2. No. of marine-based planning applications (granted/refused)~~ ~~3. No. of nearshore designations in the county~~
CDP13.4 Integrated Coastal Zone Management	√	√	√			SRA, Governments Marine Spatial Planning Division	Progress towards and preparation of an integrated Coastal Zone Management Plan for the county
~~CDP13.5 Offshore Renewable Energy Development~~	~~√~~	~~√~~	~~√~~			~~Development Management~~	~~1. Progress towards offshore renewable energy development i.e. wind, wave, tidal:~~ ~~2. Progress towards the sustainable redevelopment of Moneypoint Power Station:~~
~~CDP13.6 The Fishing Industry & Seafood Sector~~		~~√~~	~~√~~			~~Fisheries Local Action Groups (FLAGs)~~	~~1. No. of planning applications granted for fishing and aquaculture developments and associated infrastructure such as new/upgraded pier facilities, access and car parking~~
~~CDP13.7 Aquaculture~~		~~√~~				~~Development Management~~ ~~LEO~~	~~1. No. of planning applications granted for aquaculture developments in the county~~ ~~2. Value of LEO funding provided to aquaculture-related enterprises in the county~~
CDP13.8 Shellfish Waters Directive		√				Department of Marine, EPA	Achievement of water quality standards set out in the Shellfish Waters Directive in the five designated Shellfish Waters in the county
~~CDP13.9 Ports, Jetties, Harbours, Quays & Piers~~	~~√~~			~~√~~	~~√~~	~~Clare County Council~~	~~No of piers/harbours and jetties that have undergone improvement works~~
~~CDP13.10 Coastal Marina Developments~~				~~√~~		~~Development Management~~	~~No of planning applications for new marina and associated facilities in the county (granted/refused)~~
CDP13.11 Coastal Erosion & Flooding	√	√				Development Management, Department of Marine, OPW	1. No. of coastal erosion flood relief schemes planned/commenced/ completed ~~2. No. of planning applications granted/refused within Coastal areas at risk~~
~~CDP13.12 Coastal Squeeze~~						~~Development Managememt~~	~~No. of planning applications for coastal development proposals within Coastal Protection Zones~~
~~CDP13.13 Protection of Beaches & Sand Dunes~~	~~√~~	~~√~~				~~NPWS, Development Management~~	~~No. of maritime-related applications granted/refused within beach areas and sand dunes~~

CDP13.14 EU Bathing Water Directive	√	√				An Taisce, Environment Department	No. of retained and new Green Coast Awards, Clean Coasts and Blue Flags in the County
~~CDP13.15~~ ~~Island Development~~	~~√~~	~~√~~			~~√~~	~~NPWS, OPW, Department of Marine, Department of Arts~~	~~1. No. of planning applications granted for new infrastructure, access/landing facilities and associated development proposals on~~ ~~2. No. of Awards received for sustainable development of islands in the county e.g. environmental, heritage etc.~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP14.1 Landscape Character Assessment	√	√				Economic Directorate	~~1. Ongoing via Development Management (LCA utilisation)~~ 2. Completion of review and update of County Clare Landscape Strategy (dependent on national Landscape Character Assessment)
~~CDP14.2 Settled Landscapes~~	~~√~~	~~√~~				~~Economic Directorate~~	~~No. of planning applications granted/refused in areas identified as in *Settled Landscapes*~~
~~CDP14.3 Western Corridor Working Landscape~~	~~√~~	~~√~~				~~Economic Directorate~~	~~No. of planning applications granted/refused in areas identified as *Western Corridor Working Landscape*~~
~~CDP14.4 Shannon Estuary Working Landscape~~	~~√~~	~~√~~				~~Economic Directorate~~	~~No. of planning applications granted/refused in areas identified as *Shannon Estuary Working Landscape*~~
~~CDP14.5 Heritage Landscapes~~	~~√~~	~~√~~				~~Economic Directorate~~	~~No. of planning applications granted/refused in areas identified as *Heritage Landscapes*~~
~~CDP14.6 Seascape Character Areas~~	~~√~~	~~√~~				~~Economic Directorate~~	~~No. of planning applications granted/refused in areas identified as *Seascape Character Areas*~~
~~CDP14.7 Scenic Routes~~						~~Economic Directorate~~	~~No. of planning applications granted/refused in areas where access was taken directly off a *Scenic Route*~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP15.1 Biodiversity	√	√			√	Economic Directorate	1. Monitor progress made on the review of the Clare County Heritage Plan 2017-2023 and completion of same. 2. No. of Biodiversity Week events held annually ~~(a) No. of funding applications relating to biodiversity projects/initiatives made~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~ 3. ~~No. of Awards received for biodiversity projects/initiatives~~
~~CDP15.2 Natural Heritage, Biodiversity & Built Heritage Assets~~	~~√~~	~~√~~			~~√~~	~~Economic Directorate~~	~~(a) No. of funding applications for Heritage Council funding opportunities~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~
CDP15.3 European Sites	√	√				Economic Directorate	1. No. of planning applications accompanied by NIAR's 2. All new SAC and SPA designated sites mapped and made available
~~CDP15.4 Requirement for Appropriate Assessment~~		~~√~~				~~Economic Directorate~~	~~No of planning applications accompanied by NIAR~~
~~CDP15.5 Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (PNHAs)~~	~~√~~	~~√~~				~~Economic Directorate~~	~~All new NHA and pNHA designated sites mapped and made available~~
~~CDP15.6 County Geological Sites~~	~~√~~	~~√~~				~~Economic, Social, Rural and Physical Directorates~~ ~~National Parks and Wildlife Services~~	~~Measures taken to conserve, manage and enhance the character and integrity of GSIs~~
~~CDP15.7 Burren National Park, Wildlife Sanctuaries & Nature Reserves~~	~~√~~	~~√~~				~~Economic, Social, Rural and Physical Directorates~~	~~No. of collaborate initiatives to protect, manage, enhance and promote sites of ecological importance planned/commenced/completed~~
~~CDP15.8 Non-Designated Sites & Biodiversity~~	~~√~~	~~√~~				~~Economic Directorate~~	~~1. No of planning applications granted/refused accompanied by/requiring an ecological assessment~~ ~~2. Progress on and delivery of Actions of the Clare County Biodiversity Plan~~
~~CDP15.9 Natural Heritage & Infrastructure Schemes~~	~~√~~	~~√~~				~~Physical Directorate~~	~~No. of planning applications granted permission/ Part VIII consent for infrastructural projects incorporating natural heritage protection measures~~
CDP15.10 Environmental Impact Assessment	√	√				Economic Directorate	No of planning applications accompanied by EIAR

~~CDP15.11 Brownfield Site Regeneration & Contaminated Land~~	~~√~~	~~√~~		~~√~~		~~Economic Directorate~~	~~No. of planning applications granted for developments requiring site risk assessment/waste management plan/site aftercare plan/remedial action plan~~
~~CDP15.12 Biodiversity & Habitat Protection~~	~~√~~	~~√~~				~~Economic Directorate~~	~~1. No. of new sites of biodiversity importance identified in the county~~ ~~2. Monitor to ensure that there is no net loss of potential Lesser Horseshoe Bat feeding habitats, treelines and hedgerows within 2.5km of known roosts as a result of planning permissions granted~~ ~~3. Monitor progress made on and delivery of Actions of the Clare County Biodiversity Plan~~
~~CDP15.13 Urban Ecology~~	~~√~~	~~√~~				~~Economic Directorate Bird Watch Ireland~~	~~No. of plans/strategies/services incorporating biodiversity features in urban landscapes~~
~~CDP15.14 Habitat Fragmentation & Green Infrastructure Corridors~~	~~√~~	~~√~~				~~Infrastructural Providers Economic, Social, Rural and Physical Directorates~~	~~Ongoing via development management process~~
~~CDP15.15 Biodiversity on Local Authority Lands~~	~~√~~	~~√~~				~~Economic, Social, Rural and Physical Directorates~~	~~1. Enhancement of the biodiversity value of land owned and managed by Clare County Council – No. of sites enhanced~~ ~~2. Participation in the Creation of Woodlands on Public Lands Scheme – Area of new native woodlands created~~
~~CDP15.16 Inland Waterways & River Corridors~~	~~√~~	~~√~~				~~Inland Waterways Ireland Inland Fisheries Economic, Social, Rural and Physical Directorates~~	~~1. No. of riparian areas identified and subject to protection in the county~~ ~~2. No. of planning applications on riparian areas granted/refused in the county~~
CDP15.17 Freshwater Pearl Mussels	√	√				Economic Directorate	~~1. No. of planning applications granted/refused in Freshwater Pearl Mussel sensitive areas including mitigations measures~~ 2. Monitor improvements made in the conservation status of the Cloon Freshwater Pearl Mussel catchment
~~CDP15.18 Peatlands~~	~~√~~	~~√~~				~~Economic, Social, Rural and Physical Directorates~~	~~No. of planning applications granted/refused on NHA/pNHA peatland areas~~
~~CDP15.19 Woodlands, Trees & Hedgerows~~	~~√~~	~~√~~				~~Economic, Social, Rural and Physical Directorates~~	~~1. No. of tree surveys carried out in the county~~ ~~2. No. of tree preservations orders/felling licences granted in the county~~ ~~3. Ongoing via development management process - planting proposals/ecological buffer zone/ retention of hedgerows etc. in new developments~~
CDP15.20 Natural Resources & Climate Change	√	√	√			Economic, Social, Rural and Physical Directorates	1. Monitor progress made on preparing a strategy to implement an active native tree planting programme in the county ~~2. No of planning applications accompanied by EIAR~~
~~CDP15.21 Grasslands~~	~~√~~	~~√~~				~~Economic Directorate~~	~~Completion of the Habitat Mapping of the County~~
~~CDP15.22 Wetlands~~	~~√~~	~~√~~				~~Economic, Social, Rural and Physical Directorates~~	~~No of planning applications received where new wetland areas have been identified~~
CDP15.23 The Burren National Park	√	√				National Parks and Wild Life Services and the Economic Directorate	Progress on and completion of the Corofin Streetscape Enhancement Strategy

~~CDP15.24~~ ~~Limestone Habitats~~	~~√~~	~~√~~				~~Economic, Social, Rural and Physical Directorates~~	~~1. (a) No. of funding applications made for projects/initiatives to conserve protected habitats in the Burren~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~ ~~2. No. of planning applications granted/refused for new developments within protected limestone habitats~~ ~~3. No. of Awards received for sustainable development of the Burren and its protected habitats e.g. environmental, heritage etc.~~ ~~4. Delivery of supports that conserve protected limestone habitats~~
CDP15.25 Burren & Cliffs of Moher Geopark	√	√				Rural Directorate	(a) No. of funding applications made for projects/initiatives relating to the Burren and Cliffs of Moher UNESCO Global Geopark (b) No. of successful funding applications (c) Value of funding awarded (a) Monitor progress made on the delivery of the Cliffs of Moher Strategy 2040
CDP15.26 World Heritage Site Status	√	√				Economic Directorate	Monitor progress made on the applications for inclusion on the World Heritage Site Tentative List for identified sites in County Clare
~~CDP15.27~~ ~~Development Proposals in Designated World Heritage Sites~~	~~√~~	~~√~~				~~Economic Directorate~~	~~1. Monitor the applications made to the tentative Site list.~~ ~~2. Subject to successful applications being made monitor the no. of planning applications granted/refused on the world heritage sites in County Clare~~
CDP15.28 Dark Sky Reserve Designations	√	√				Rural and Physical Directorates	1. Progress on and identification of a potential Dark Sky Reserve in the county 2. No. of public lightings systems replaced in the county
CDP15.29 Alien & Invasive Species	√	√				Economic, Social, Rural and Physical Directorates	1. ~~No. of planning applications granted/refused accompanied/requiring an invasive species management plan in the county~~ 2. No. of Invasive Species Surveys carried out in the county
CDP15.30 Green Infrastructure & Climate Change	√	√	√	√	√	Economic, Social, Rural and Physical Directorates	1. Progress on and delivery of green infrastructure proposals identified in the Green Infrastructure Plan for Shannon 2. Progress on and completion of a green infrastructure plan for Ennis and Kilrush during the lifetime of this Plan

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP16.1 Architectural Heritage	√	√				Economic Directorate	1. No. of new Protected Structures and ACAs identified int the county 2. No. of planning applications granted/refused affecting Protected Structures and ACAs in the county
CDP16.2 Protected Structures	√	√				Economic Directorate	1. No. of planning applications granted/refused affecting Protected Structures 2. No. of Section 57 Declarations considered ~~3. No. of applications for Built Heritage Investment Scheme/Historic Structures funding opportunities~~ ~~4. No. of requests for additions/deletions to the Record of Protected Structures and outcome~~ 5. ~~Review of the Record of Protected Structures completed~~
~~CDP16.3 Industrial Heritage~~	~~√~~	~~√~~				~~Economic Directorate~~	~~No. of planning applications granted/refused affecting Protected Structures and No. of Section 57 Declarations granted in the county~~
~~CDP16.4 Revitalisation of Vernacular Heritage~~	~~√~~	~~√~~				~~Economic Directorate~~	~~1. No. of planning applications granted/refused for replacement dwellings in the county~~ ~~2. No. of planning applications granted/refused for refurbishment/extension of existing vernacular buildings in the county~~
~~CDP16.5 Architectural Conservation Areas (ACAs)~~	~~√~~	~~√~~				~~Economic and Rural Directorate~~	~~1. No. of planning applications granted/refused within ACAs in the county~~ ~~2. No. of planning applications for demolition/removal of existing structures in ACAs granted/refused in the county~~ ~~3. Design, scale, setting, materials used, colour scheme etc. are assessed on an ongoing basis via the development management process~~
~~CDP16.6 Proposed Works to Buildings – Protected Species & Environmental Considerations~~	~~√~~	~~√~~				~~Economic Directorate~~	~~No. of planning applications for heritage related projects and developments that were accompanied by an EIAR and NIS~~
CDP16.7 Maintenance & Improvement of Architectural Heritage	√	√				National Monuments Service	1. Progress on and completion of a Climate Change Vulnerability Risk Assessments of the Archaeological and Architectural Heritage and Cultural Assets of the county ~~2. No. of planning applications granted/refused affecting Protected Structures and No. of Section 57 Declarations granted in the county~~ 3. ~~No. of applications for Built Heritage Investment Scheme/Historic Structures Fund~~
~~CDP16.8 Sites, Features & Objects of Archaeological Interest~~	~~√~~	~~√~~				~~Economic Directorate and Local Communities~~	~~1. Protected on an ongoing basis via the development management process~~ ~~2. (a) No. of funding applications relating to archaeological heritage made to the Community Monument Fund awards~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~
~~CDP16.9 Newly Discovered Archaeological Sites~~	~~√~~	~~√~~				~~National Monuments Service~~	~~1. No. of archaeological sites identified since the publication of the Record of Monuments and Places within the county~~ ~~2. No of planning applications granted/refused within archaeological sites identified since the publication of the Record of Monuments and Places within the county~~
~~CDP16.10 Zones of Archaeological Potential~~	~~√~~	~~√~~				~~National Monuments Service~~	~~No of planning applications granted/refused within zones of Archaeological Potential located in both urban and rural areas~~
CDP16.11	√	√				Economic Development Directorate	No. of planning applications and Section 254 Licences that were accompanied by an Archaeological Impact Assessment Report

Archaeology & Infrastructure Schemes							
~~CDP16.12~~ ~~Raising Archaeological Awareness~~	~~√~~	~~√~~				~~Economic and Rural Development Directorate~~	~~No. of conservation plans prepared for historical church and graveyard sites in the county~~
~~CDP16.13~~ ~~Underwater Archaeology~~	~~√~~	~~√~~				~~National Monuments Service/ Department of Agriculture, Food and the Marine~~	~~1. No. of new underwater archaeological sites identified in the county~~ ~~2. No. of exploration projects/initiatives relating to underwater archaeological sites carried out in the county~~
CDP16.14 Art, Heritage, Cultural and Creative Sectors	√	√			√	Social Development Directorate	Progress on and delivery of actions identified in the Clare Arts Development Plan 2019-2023
~~CDP16.15~~ ~~Museums, Heritage & Cultural Centres~~	~~√~~	~~√~~			~~√~~	~~Economic, Rural, Social Development Directorates~~	~~1. No. of new/upgraded museum, heritage and archive facilities delivered in the county~~ ~~2. No. of events/new events taking plan during Heritage Week~~
~~CDP16.16~~ ~~Genealogy~~		~~√~~				~~Social Development Directorate~~	~~No. of new data streams providing access to genealogy material not previously available~~
CDP16.17 Oidhreacht Theanga/Linguistic Heritage		√			√	Economic, Physical, Social and Rural Development Directorates	1. Development of a language Plan for the Irish Language Network in Ennis 2. No. of new Irish language events in the county ~~3.~~ (~~a) No. of funding applications for Irish language related projects/initiatives in the county~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~
CDP16.18 Folklore & Oral Cultural Heritage		√			√	Economic, Social and Rural Development Directorates	1. No. of new initiatives for the gathering, recording, preservation and promotion of folklore and oral cultural heritage ~~2. (a) No. of funding applications for folklore and oral cultural heritage projects/initiatives in the county~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP17.1 Town & Village Centre Vibrancy	√	√		√	√	Economic, Rural, Social and Physical Directorates	1. No. of public realm projects/initiatives completed 2. Completion of annual Ennis Town Centre Health Check 3. No of sites entered on/ removed from the Vacant Site Register 4. No of sites entered on/ removed from the Derelict Sites Register and no. of derelict sites improved
CDP17.2 Town & Village Improvement Strategies	√	√			√	Economic and Rural Directorates and local communities	~~1. No of town and village improvement strategies prepared~~ ~~2. Progress on/delivery of actions identified in town and village improvement strategies~~ ~~3. (a) No. of applications for Community Enhancement Grant funding~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~ 1. No of Town Centre First initiatives and masterplans initiated and completed
~~CDP17.3 Shannon Town Centres~~	~~√~~				~~√~~	~~Economic and Rural Directorates and Shannon MD~~	~~1. Completion of the Shannon Town Centre Masterplan~~ ~~2. Review of the Shannon Green Infrastructure Plan and associated projects~~
CDP17.4 Town Teams	√	√			√	Economic, Rural, Physical and Social Directorates	No. of projects/plans prepared/commenced/completed by the various Town Teams and supported by Clare County Council
~~CDP17.5 Regeneration & Development Funding~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Economic, Rural, Physical and Social Directorates~~	~~(a) No of applications made under~~ ~~• Urban Regeneration Development Fund~~ ~~• Rural Regeneration and Development Fund~~ ~~• Town and Village Renewal~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funding awarded~~
CDP17.6 Opportunity Sites	√	√		√		Economic, Rural, Physical and Social Directorates	No. of Opportunity Sites on which proposals are progressing (pre-planning, planning application stage, development etc)
CDP17.7 Town & Village Centre Vacancy	√	√		√		Economic Directorate Housing Section	1. No of Initiatives implemented to engage with property owners to address vacancy 2. No. of vacant properties owned by Clare County Council 3. No. of vacant properties owned by Clare County Council brought back into use 4. No. of targeted measures/initiatives implemented to address vacancy and deliver sustainable reuse/regeneration of same
~~CDP17.8 Addressing Depopulation~~	~~√~~	~~√~~		~~√~~		~~Economic, Rural, Physical and Social Directorates~~ ~~Community Development Officers~~	~~No. of initiatives implemented to address depopulation in individual settlements in the county~~
CDP17.9 Lands Identified As Areas On Which the Vacant Site Levy can Apply	√	√	√			Economic Directorate	No of sites entered on/removed from the Vacant Sites Register
CDP17.10 Derelict Sites	√	√	√			Economic Directorate	No of sites entered on/ removed from the Derelict Sites Register and no. of derelict sites improved
~~CDP17.11 Town & Village Centre Infill Development~~	~~√~~	~~√~~	~~√~~			~~Economic, Rural, Physical and Social Directorates~~	~~No. of infill sites identified that have been developed~~

~~CDP17.12~~ ~~Community Activity~~	~~√~~			~~√~~	~~√~~	~~Rural Directorate~~	~~(a) No. of applications for Community Enhancement Grant funding~~ ~~(b) No. of successful funding applications~~ ~~(c) Value of funds awarded~~

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP18.1 Sustainable Place Framework	√	√	√	√	√	Economic and Rural Development Directorates	Progress on and delivery of a Sustainable Place Framework
~~CDP18.2 Achieving Quality in the Public Realm~~	~~√~~	~~√~~			~~√~~	~~Planning/Municipal Districts~~	~~1. No of public realm improvement works planned/commenced/completed in each Municipal District 2. No. of planning applications accompanied by a Design Statement 3. No. of planning applications accompanied by a Health Place Audits~~
CDP18.3 Ten Minutes Towns	√		√		√	Public, Physical and Economic Development Directorates, transport and service providers	No. of public and smart travel initiatives planned/commenced/delivered that assist compact growth in existing built-up areas of the county
~~CDP18.4 Universal Design~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Agents/ Development Management/ Housing Section / private developers / Accessibility Officer~~	~~Ongoing via pre-planning and development management process~~
~~CDP18.5 Sustainable Developments~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Private Developers, designers, Development Management/ Housing Section~~	~~Ongoing via pre-planning and development management process~~
CDP18.6 Design & Built Environments	√	√				Economic and Physical Directorate / private developers and designers.	Progress on and development of a Design Awards Scheme

Chapter 19. Land Use & Zoning

Objective	Strategic Development Plan Principles					Implementation	Monitoring and Evaluation (Key Performance Indicator / Data Source)
	Quality of Life	Sustainability	Climate Action	Resilience	Inclusivity		
CDP19.1 Local Area Plans	√	√	√	√	√	Planning / Ennis MD and Shannon MD	Preparation and delivery of local area plans for: (a) Shannon Town and Environs, and (b) Ennis and Environs LAP
~~CDP19.2 Zoning of Lands~~	~~√~~	~~√~~	~~√~~	~~√~~	~~√~~	~~Development Management /Social and Affordable Housing Allocation~~	~~Delivery of local area plans for: (a) Shannon Town and Environs, and (b) Ennis and Environs in line with Core Strategy population targets~~
CDP19.3 Compliance with Zoning	√	√	√	√	√	Development Management	No. of Material Contraventions over the lifetime of the plan

Submission No: S2/015 –Southern Regional Assembly
Relevant Chapters / Topics • **Regional Priorities**
Summary of Issues Raised in Submission

The submission acknowledges and commends the work that has been undertaken in the preparation of the Draft Plan and its alignment of its principles with the National Planning Framework (NPF), Regional Spatial Economic Strategy (RSES) and the Limerick-Shannon Metropolitan Area Strategic Plan (LSMASP). The submission outlines its key regional priorities for the County which include: The Limerick-Shannon Metropolitan Area as a primary driver of economic and population growth in the Southern Region; Shannon within the MASP as a significant regional strength and employment centre; Ennis Key Town as regional economic driver and a key location for investment and choice in the region; Support and promote the delivery of the Strategic Development Locations as set out in the SIFP for the Shannon Estuary; Potential network of North Kerry/West Limerick/Shannon Estuary/Clare; Galway-Ennis-Shannon-Limerick Economic Network; smaller scaled settlements and the opportunities for shared assets and opportunities between them.

Core Strategy

The RSES seeks a tailored approach to the achievement of NPF and RSES growth targets, with RPO 3 requiring that in preparing Core Strategies Local Authorities shall determine a hierarchy of settlements and appropriate growth rates in accordance with guiding principles in Section 3.3 of the RSES. The core strategy is the fundamental element in setting Clare on the path to transformational change by 2040 in its guidance for the quantum and location of development. This must be done in a sustainable, infrastructure led manner to achieve national and regional policy targets for accelerated growth in the region.

Recommendation 1: Settlement Strategy

a) The Core Strategy figures for Limerick City and Suburbs and the Metropolitan Area are inconsistent with Table 1 of the Limerick-Shannon MASP. As a result, there are concerns with the overall County figures and their alignment with the RSES and NPF Implementation Roadmap. The Planning Authority is requested to revisit the Core Strategy population figures, clarify calculations and make any appropriate amendments to the Core Strategy to ensure alignment with the NPF Implementation Roadmap and consistency with Table 1 of the Limerick-Shannon MASP.

b) Limerick Shannon MASP Policy Objective 14 supports an application for the designation and subsequent development of the lands zoned as University in the Clare County Development Plan 2017 – 2023 as an Economic Strategic Development Zone (SDZ) subject to the provisions of the Planning Acts and all environmental considerations. Section 8.4.2 of the LSMASP details the positive economic proposition of this proposal. The Regional Assembly supports an application for the proposed South Clare/ UL Economic SDZ in accordance with the RSES and for the Council to pursue this proposition. However, the Regional Assembly considers that additional clarity is required in order to demonstrate that the pathway pursued supports the delivery of the project in accordance with the RSES. The Draft Plan acknowledges that the project is 'above and beyond the scope of the population allocation' nonetheless the Core Strategy contains specific population

allocations relating to the project. In this regard it is noted that no order has been made to date under the Part IX process of the Planning Acts and pending the completion of this process the inclusion of specific allocations within the Core Strategy would appear to be premature. The Planning Authority is requested to respond to the above points and to provide additional clarity and analysis to demonstrate that the approach followed is consistent with the RSES. It is considered that an alternative approach could be examined to ensure that the Planning Authority can pursue and advance the proposed Limerick City and Suburbs and the Metropolitan Area subject to the provisions of the Planning Act.

c) The Draft Plan states that 'Additional provision' of 25% has been applied to the Core Strategy. It is unclear where this 25% is derived from, where it is to be applied or how it complies with the NPF, RSES or national guidelines. To ensure that the approach taken is consistent with the NPF and RSES it is recommended to set out the methodology on the figures were derived and only those consistent with the NPF, RSES RPO 3, RPO 11 and the Guiding Principles under Section 3.3: A Tailored Approach should be included.

d) The Draft Plan states that additional lands are zoned in some settlements to cater for the 'net need' as per the Clare County Council's Housing list. However, the methodology for the application of NPF population and housing projections into local authority plan processes, as per Department Guidelines, already incorporates "homeless households and unmet demand". The Planning Authority is requested to address this point and to make changes accordingly.

e) The Planning Authority is requested to incorporate extant planning permissions in undertaking an analysis of the area of land in hectares zoned for residential development in each settlement and the proposed number of housing units to be included in the area.

f) The Planning Authority is requested to clarify information on the prioritisation of zoned land to be serviced for development including service status, i.e., whether classified as 'Tier 1 Serviced Lands' or 'Tier 2 Serviceable Lands', as well as potential housing yield estimates. Accompanying maps, that identify Tier 1 and Tier 2 lands in relation to land use zonings would provide a better visual explanation to the reader. When considering zoning lands that require investment in service infrastructure, the Planning Authority should include the reasonable cost estimates of delivering required services.

g) The Draft Plan provides a population allocation for the plan period 2023 to 2029. From information provided, it is not possible to ascertain the projected population increase from 2016 to 2029. The Planning Authority should address this point to demonstrate alignment with NPF Roadmap projections. The addition of the projected population figures for 2031 could be provided for information purposes.

h) In addition to the above, it appears that an additional year has been incorporated into the Draft Plan calculations. The Planning Authority is requested to clarify the timeline used for the Draft Plan calculations and to ensure that the timeline is consistent with the Development Plan.

Recommendation 2: Limerick-Shannon Metropolitan Area

a) LSMASP Policy Objective 1 states that it's an objective to promote the Limerick-Shannon Metropolitan Area as a cohesive Metropolitan Area. It is recommended that the Development Plan and Core Strategy table provide additional content on the Metropolitan Area to reflect its identification in the NPF and RSES settlement hierarchy as a priority location for significant housing and employment growth and develop the Limerick Shannon MASP Vision for the Metropolitan Area 'to exert critical-mass leverage at an international level'. In recognition of the

significant role which Clare County Council plays in the implementation of the LSMASP, it is recommended that a distinct section/ chapter is provided to address the challenges and opportunities which the Metropolitan Area provides for the Region. This should include a shared section developed with Limerick City and County Council and the SRA relating to the MASP which could be included in both Development Plans. The Regional Assembly are happy to assist in the development of this content.

b) The Regional Assembly considers that greater clarity and analysis on the population projections in relation to the Limerick City and Suburbs and Metropolitan Area is required to strengthen the Core Strategy and to demonstrate that the approach is consistent with the Limerick-Shannon MASP. This should be expressed in a revised Core Strategy and should include the population categories referenced for the Limerick Shannon MASP in the NPF Roadmap and Section 5.0 of the MASP.

c) Section 2.2 of the LSMATS states that Shannon is identified for significant population growth i.e., greater than 30% population increase by 2040. From information provided in the Core Strategy, it is not possible to ascertain the projected population increase for Shannon from 2016 to 2029. In this regard, recommendation 1(g) of this submission should be addressed. It is recommended that the Draft Plan should promote a collaborative intra-regional partnership approach between Limerick-Shannon, Cork, Waterford and Galway reflecting their priority status within the NPF.

Recommendation 3: Key Town of Ennis

Key Towns play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. Section 3.5: Key Towns, RPO 11: Key Towns and RPO 13: Ennis provide a significant policy platform for the role and future development of Ennis. From information provided in the Core Strategy, it is not possible to ascertain the projected population increase for Ennis from 2016 to 2029. In this regard, recommendation 1(g) of this submission should be addressed.

Recommendation 4: Towns, Villages, Clusters and Open Countryside

a) The Planning Authority is requested to clarify if the "unserviced" category includes Clusters and open countryside. These appear in Table 3.1: Settlement Hierarchy but are unaccounted for in the Core Strategy.

b) The Planning Authority is requested to clarify the individual population and housing projections for the Tier 2 Large Villages and Small Villages. These settlements should be expressed in a revised Core Strategy.

c) The Small Villages of Cratloe and Ardnacrusha appear in the Core Strategy table, but no population allocation or housing units have been assigned to these settlements. The Planning Authority is requested to address this issue and provide associated details.

d) The Settlement Hierarchy proposes 94 Clusters which appear to be included in the "Unserviced: Tier 2 Large Towns & Small Villages" category in the Core Strategy table, however the projected growth for these is unclear. The Planning Authority is requested to review if each of Clusters referenced are consistent with effective Climate Action, modal shift to more sustainable transport, availability of social and physical infrastructure and the viability and vitality of towns and villages in the higher tiers and to revise the Core Strategy accordingly.

e) Prior to finalisation of the Draft Plan, it is recommended that the Council should ensure that policies and objectives relating to housing in the open countryside is consistent with RPO 27, national policy (NPO 17), Circular Letter PL Circular letter PL 2/2017 Re: Sustainable Rural Housing Guidelines for Planning Authorities and is also consistent with other objectives in the Draft Plan for Climate Action and environmental management.

Recommendation 5: Achieving Compact Growth Targets

a) The Draft Plan contains a positive commitment to achieving compact growth through objectives, regeneration and active land management initiatives. To build on this commitment it is recommended that the Plan demonstrate how targets for compact growth, as per RPO 35 (Support for Compact Growth), are being met within the existing built-up footprints of settlements. This could be achieved by the identification of the number and percentage of units targeted for greenfield development and those targeted for the existing built-up footprint within the maps and details presented in the Volume 3's. Inclusion of the yield of residential units from zoned sites within the built-up footprint would assist Development Plan monitoring on how each settlement is performing successfully under NPF and RSES compact growth objectives, including NPO 3 and RPO 35.

b) The Core Strategy table refers to "Brownfield 30%" plan as per the Draft Development Plan Guidelines. Minimum Compact Growth targets of 50% for cities and suburbs and 30% for other settlements are contained in NPO 3 and RPO 35: Support for Compact Growth. Clarity on how these minimum Compact Growth targets will be achieved on this point is requested.

c) The Planning Authority should reconsider the Core Strategy density approach to align with Section 3.9 of the RSES, RPO 31, and Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages). The Planning Authority should also demonstrate how the density assumptions for the Limerick City and Suburbs component of Clare align with the rest of the settlement.

Recommendation 6: RSES Economic Principles

It is recommended that the Draft Plan economic strategy be reviewed to incorporate the 5 principles of the Region's Economic Strategy as set out in Chapter 5 of the RSES including Clustering, Capacity Building, Smart Specialisation and Knowledge Diffusion.

Recommendation 7: Climate Action

a) The transition to a low carbon economy can offer significant opportunities to achieve sectoral diversification, particularly for rural areas. It can also promote sustainable local development including building inclusive, climate resilient and energy efficient communities. It is recommended that this should be further explored in the Draft Plan by the inclusion of a section linking climate action, job creation and economic development. RPO 56: Low Carbon Economy, and Section 1 of Chapter 5 of the RSES is particularly relevant.

b) Having regard to the important leadership role played by the local authority, the evolving and highly ambitions Climate Action legislative and policy platforms at national and EU level, the Planning Authority should strengthen the Climate Action policies and objectives. RPO 163: Sustainable Mobility Targets is particularly relevant in this regard as it calls for targets and actions which will help achieve higher performance in modal shift to sustainable mobility. In addition to addressing implementation and consistency with RPO 163, the Planning Authority should consider how Climate Action targets could be applied to other areas of the Draft Plan.

Recommendation 8: Sustainable Mobility and Transport

a) It is considered that the incorporation of the provisions of Policy Objective 6 (b) and (d) of the Limerick-Shannon MASP into a specific objective, possibility Objective CDP11.3, would further strengthen the policy commitment to sustainable transportation and enhanced alignment with Guiding Principle "Integrated transport and land use" as contained in Section 3.2 of the Limerick-Shannon MASP.

b) Further alignment with Section 8.3: A Smart Metropolitan Area and Strengths in Attracting FDI and Policy Objective 12 of the Limerick-Shannon MASP can be achieved by elaborating on the digital and Smart City opportunities for the Metropolitan Area as a whole. This will assist in developing a positive business ecosystem which is essential to the achieving the vision of the Limerick-Shannon MASP.

Infrastructure

When considering zoning lands that require investment in service infrastructure, Planning Authorities are required to include the reasonable cost estimates of delivering required services at both draft and final plan stages. Recommendation 1(f) of this submission should be noted in this regard.

Recommendation 9: Environment

a) It is recommended that reference to 'Green Infrastructure' is expanded to include 'Blue Green Infrastructure'. This will assist alignment with Section 3.2 Guiding Principles of the LSMASP, Chapter 5 of the RSES and RPO 123.

b) Having regard to RPO 110: Ecosystem Services of the RSES and NPO 58 of the NPF, the Planning Authority is requested to clarify how ecosystem services have been incorporated into the preparation of the Draft Plan.

c) The Planning Authority is requested to provide greater clarity in the Volume 3's in relation to flooding implications for land use zoning. Consideration should be given to overlaying relevant maps contained in the Strategic Flood Risk Assessment on the land use zoning maps.

Sustainable Communities

The draft Plan is particularly strong in its policy approach to sustainable communities and have provided a wide-ranging framework in seeking to achieve a good quality of life.

Environmental Assessment

Recommend that Clare County Council review the RSES environmental assessments (SEA and AA) these documents to inform their own assessments and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Draft Development Plan where relevant

Chief Executive's Response

Response to Recommendation 1

a) The Core Strategy population figure has been amended to align with the 6-year population target as set out in the NPF and RSES, and the allocation adjusted accordingly for each settlement. The population allocation for Limerick City and Suburbs and the Metropolitan Area are somewhat below the targets set out in the RSES. In the interest of proper planning and sustainable development the Metropolitan Area is not capable based on infrastructure deficiencies at present to cater for any more growth than that which it has been assigned in the Core Strategy. Should these deficiencies be addressed in the future, subsequent plan cycles will then address the achievement of the population targets as set out in the NPF Implementation Roadmap, the RSES and the LSMASP. This situation is confirmed by the preliminary census figures (CSO June 2022) which shows poor and stifled growth in the Limerick Suburbs (within Clare) and settlements in that vicinity even though a significant amount of land was zoned.

That portion of the Limerick suburbs in Clare (Athlunkard & Parteen) does not facilitate the growth envisaged by the RSES given the boundary alignment, along with the natural boundaries present such as the River Shannon, and the Ardnacrusha Headrace, Parteen Bridge, and flood zones. In the absence of commitment for the LNDR it would be premature to zone lands to the extent envisaged by the RSES due to capacity constraints however it is hoped that this can be achieved in future plan cycles once such fundamental issues are resolved. These obvious deficiencies were highlighted in this consultation process with a significant number of submissions received on the Draft Plan relating to same and in particular the traffic gridlock due to the geographical constraints outlined above. The Draft Plan has sought to zone adequate lands in the Limerick suburbs relative to the very real constraints in the area which are not only restricting future growth but also impacting quality of life for existing residents.

The remainder of the metropolitan area also has a number of villages which do not have any wastewater infrastructure, most notably Ardnacrusha whose location relative to Limerick City makes it an attractive location, yet its growth is constrained by both wastewater and geographical constraints as highlighted above.

b) The proposed Economic Strategic Development Zone (SDZ) is currently under determination by the Minister. The SDZ figure of 3,500 has been omitted from the Core Strategy population with a figure of 194 given for the plan period and it made explicitly clear that the 3,500-population figure is a longer-term population. While the proposed South Clare/University of Limerick Economic Strategic Development Zone (SDZ) is yet to be designated it has the potential to be in place to some extent during the lifetime of this Plan. This full 3,500 population is above and beyond the scope of the population allocation in the current plan cycle and is seen as a medium to long term project of regional and national importance. It is deemed appropriate in accordance with the Department of Environment, Heritage and Local Government, Guidance Note on Core Strategies, Section 3, to refer to the potential population yield of such a project, which supports Development Plan Core Strategies to consider later phases of development in SDZs as part of a strategic land bank. In doing so an explanatory note will be added underneath the Core Strategy Table (Table 3.4) explaining that there is an objective to allocate an additional long-term population target of 3,303 persons to the SDZ.

c) The Core Strategy now includes “Additional Provision” as per Section 4.4.3 of the Draft Development Plan Guidelines, 2021. This approach recognises that a degree of choice in

development sites to be provided locally is desirable to avoid restricting the supply of new housing through inactivity on a particular landholding or site. Therefore, the use of the additional provision mechanism increases the probability of achievement of the housing supply targets in the first instance.

The Draft Development Plan Guidelines do not restrict the settlement tiers to which "Additional Provision" can be applied but says "The extent of any Additional Provision must be comprehensively identified, quantified and explained in the core strategy and shall not exceed 20-25% of the required quantum of zoned land and sites in settlement in any planning authority area as a whole, for any six-year plan period.

Additional Provision has been added across the County and its exact locations identified in the Core Strategy table. It has been primarily used in Ennis and the Metropolitan Area and then in areas housing demand is highest and where adequate services are available to support it. It has also been used in some smaller scale settlements where the level of land provision is so small it may only be one parcel of land, and if that parcel does not come forward no growth can happen, therefore it is explicitly needed in these locations to increase the probability that some growth will occur.

Finally, I see this CDP cycle as a transitional one from a situation of extensive zoning across the county to a massively reduced amount, and the additional provision is needed to cushion this transition. In fact, in excess of 700ha of land has been dezoned in the Draft Plan with almost 400ha of that being in serviced settlements. Therefore, additional provision of 25% is essential for this plan and to ensure that the housing supply target is actually achievable having regard to lands that may not come forward in the Plan cycle.

d) County Clare is in a unique position nationally, in terms of the number of Ukrainian Refugees it has become home to as part of the Humanitarian Response to Persons Arriving in Ireland fleeing the Conflict in Ukraine. At the time of writing there are 2,487 Ukrainians in emergency accommodation in County Clare and it is believed that there is an additional 1,000 in private accommodation across the County. Therefore, at present Ukrainian refugees amount to approx. 3% of the Clare population (CSO, 2022). In addition, the preliminary CSO 2022 County Clare population of 127,419 has outstripped the NPF target compared to a linear interpolation of 2016 to 2026 NPF Implementation Roadmap population projections. I acknowledge the HST methodology, and it is respected that the ESRI work provided a consistent national methodology for translating the population set out in the NPF and the RSES into projected demand for new households. The HST Guidelines methodology takes account of all projected housing supply, social and private however it has not taken account of the Ukrainian crisis. In the County Clare case the HST (4,500 units) derived by the HST methodology is not reflective of the unprecedented reality we are now dealing with of housing a large number of Ukrainian migrants, relative to our population. It is acknowledged that not all Ukrainians will remain in the county/ Country, but it is expected a large number will. This housing need has not been considered in any of the policy documents or methodologies which produce both the population and housing supply target for County Clare. Yet, the Council has been instructed by Minister Darragh O'Brien, letter dated 1st of April 2022, to identify "sites that may be suitable for the immediate development of temporary or permanent housing, and

which has not already been earmarked for social and affordable housing under Housing for All" to cater for this unique need.

As a result of the unprecedented issues outlined above and in the knowledge that this housing demand is over and above what the NPF, RSES and HST methodology has catered for, the Council has had no choice but to add additional "unmet" housing units and population to the Core Strategy. This is done in the first instance to be able to provide sites as requested by the Minister for this specific need, but also to protect the original planned growth (4,500 units & 7,213 people) such that land/houses will be available to meet their needs over the Plan period having regard to the current severely dysfunctional housing market where supply of new homes is trailing well behind demand and there is significant unmet demand in the market all across the county which remains to be satisfied. The Local Authority see no other way to address this scenario but to add an unmet demand to the Core Strategy arising from Humanitarian Response to Persons Arriving in Ireland fleeing the Conflict in Ukraine given the high number of Ukrainian migrants relative to the County population. This is considered justified for the following reasons:

1. Data shows 3,500 displaced people from Ukraine currently residing in Clare. This is anticipated to continue increasing in the near term. This population is not accounted for in the NPF Implementation Roadmap population projections.
2. The preliminary 2022 Census results show an additional population of 1000 in 2022 in Clare compared to a linear interpolation of 2016 to 2026 NPF Implementation Roadmap population projections. This highlights only a portion of those additional displaced people from Ukraine (to April), but also higher natural growth.

   Taking account of the above factors it is considered appropriate to plan for an additional 2,000 persons/1,260 units distributed across the County to meet the housing needs of the additional population not represented in the NPF Implementation Roadmap population projections. Failure to plan to meet the needs of the current population in Clare would have adverse distortionary effects on the housing market. It is recognized that a proportion of Ukrainians will return home however it is currently impossible to provide an informed estimate of the numbers of Ukrainians who will remain living in Ireland in the medium-long-term. In this respect it is proposed to plan to accommodate an additional 2,000 persons over the plan period.

   The location and extent of this "unmet" need/demand is clearly identified in the Core Strategy Table and the subsequent land equivalent in hectares. Having regard to the Governments intention to end the Direct Provision system by 2024, and the enhanced role local authorities and AHBs will play in that new system, it was deemed most appropriate to distribute the unmet "Ukrainian" need by location relative to the unmet social housing need based on details provided by our housing department.

e) In relation to Ennis, Tulla, Quin, Crusheen, and Bunratty the residential zoned land figure identified in the Core Strategy includes extant permissions. Thus, the zoned land figure appears high, but the reality is this relates to extant permissions accounted for in the HST Methodology as completions prior to the coming into effect of the Plan. Therefore, it is not impacting on the HST figure for the 6 year plan cycle.

f) The Plan includes a Serviced Land Assessment and this needs to be revised to indicate whether the lands are Tier 1 or Tier 2. All parcels of land are identified by their zoning label, the settlement maps are labelled and these may be cross referenced with the SLA. There are a number of steps from design concept to preliminary design, preferred options, then detailed design before an actual 'reasonable estimate' of delivering the project can be identified. The Council is not in a position to provide a set of costs that it would consider to be reasonable for such projects. In addition, other issues such as inflation and potential increases in construction costs also have to be considered, particularly for larger projects which may not commence for a number of years or extend into the next development plan. No guidance has been given as to how this should be factored into the 'reasonable estimate' or how same might impact future procurement. The Council is not the sole provider or developer of such infrastructure and Irish Water would need to provide information for their utilities. Therefore, an estimate of the costs of the delivery of the infrastructure will not be included in the assessment as the Council is not in a position to provide a 'reasonable estimate' nor do I consider it appropriate.

g) The Core Strategy now provides an estimated 2029 population target.

h) Noted, the Core Strategy population figure is now based on the 6-year time frame of the Development Plan.

Response to Recommendation 2: Limerick-Shannon Metropolitan Area

a) Noted, it is proposed to rename Chapter 4, Urban and Rural Settlement Strategy to Urban and Rural Spatial Strategy. Within this chapter there is an existing section on the Limerick Shannon Metropolitan Area, and additional text and maps will be included here as appropriate.
Volume 3b Shannon Municipal District includes all the LSMA settlements except for O'Briendsbridge. Volume 3b will be renamed as Shannon Municipal District Settlement Plan & The Limerick Shannon Metropolitan Area Plan. O'Briensbridge will be added to this volume also to make it a comprehensive LSMA settlement plan including settlement maps. An additional section will be added to the front of this volume in relation to the LSMA by way of introduction.

b) Noted, see response above to Recommendation 1 (a)

c) Noted, the Council shall continue to collaborate with other Local Authorities.
A 2029 population target is not included in the Core Strategy Table.

Response to Recommendation 3: Key Town of Ennis

A 2029 population target is now included in the Core Strategy Table.

Recommendation 4: Towns, Villages, Clusters and Open Countryside

a) The "unserviced" category includes unserviced villages, clusters and the open countryside. This will be clarified in the Core Strategy Table.

b) Noted, these are small villages all of which have no wastewater infrastructure, consequently no residential zoning/ individual growth allocation and are grouped together in an unserviced category. I do not see any merit in giving the individual population of these 52 settlements.

c) Similar to b) above these villages have no wastewater infrastructure and consequently no residential zoned land allocation and can only cater for a small level of development on private treatment systems. Therefore, the allocation for the rural Metro area and the unserviced settlements within this area is grouped together and identified in the Core Strategy table.
d) The rural clusters have historically been included in the Clare County Development Plan. These areas are largely built out with very limited opportunities for individual houses. This plan cycle has not enlarged the cluster boundaries or added any additional land or added any new rural clusters. It is deemed appropriate to maintain the clusters for this plan cycle.
e) I am satisfied that objectives relating to housing in the open countryside are consistent with NPO19 and RPO27 and Circular Letter PL Circular letter PL 2/2017 Re: Sustainable Rural Housing Guidelines for Planning Authorities

Response to Recommendation 5: Achieving Compact Growth Targets

a) Additional text has been added to Chapter 3 on compact growth and the Core Strategy Table now clearly identifies the number of units delivered as compact growth. The heading used in the Core Strategy table "Brownfield" was misleading, and this is now entitled compact growth. Compact growth units are all to be delivered on town centre and mixed use sites. The 70% greenfield components are all to be delivered on residential zoned lands. It should be noted that in most instances the residential lands will also support compact growth by definition as they are largely within the defined CSO boundary of settlements. See response to the OPR submission S2-014 in this regard.

b) As per a) above

c) The lower density element has been removed from the calculation of residential land provision for Athlunkard. As detailed earlier in the submission, Athlunkard has severe infrastructure constraints and the maximum appropriate land has been zoned at this location. Parteen while within the suburbs retains a very rural character and again is constrained by Parteen Bridge with a single lane traffic system. Until such time as the infrastructure constraints are resolved, Parteen village is not capable of providing for very high density development and the higher and lower density assumption has been retained here having regard to the nature of the settlement rather than just purely its location within the Limerick Suburbs.

Response to Recommendation 6: RSES Economic Principles

In the interest of clarity and having regard to the subject matter, reference to chapter 5 in the recommendation appears incorrect and should read Chapter 4 a Strong Economy Innovative and Smart.

Noted, additional text will be included to make reference to the principles of the Regional Economic Strategy to be included in Chapter 6 of the Plan.

Response to Recommendation 7: Climate Action

a) The Draft Plan includes an entire chapter (2) on climate action, and it is a cross cutting theme throughout the plan. I believe RP0 56 is adequately addressed in the plan specifically in CDP2.14 Transition to a Low Carbon Economy and that no amendments to the plan are required in this regard.

b) It is deemed inappropriate to set targets at this juncture for sustainability due to the lack of background data. However, a baseline has been determined and this will be monitored over the plan period such that future plan cycles can set informed targets.

Recommendation 8: Sustainable Mobility and Transport

a) I consider that the identification, within Core Strategies, of public transport corridors and station nodal points on corridors in LSMA can only proceed once those locations are identified in the public transport network planning that will occur following the adoption of LSMATS.

In terms of public transport network planning, the LSMATS Implementation Plan includes the design phase of the BusConnects Core Bus Corridors and the design phase of Bus Connects Services, as well as the development of the Phase 1 Rail Network. These phases correspond with the forthcoming lifetime of the Development Plan (2023-2029), and therefore it is not possible for the CDP Core Strategy to pre-empt the implementation of LSMATS in that regard.

b) Noted.

Response to Recommendation 9: Environment

a) Blue Infrastructure, and Blue Green Infrastructure is referenced throughout the Plan as appropriate and I do not see it necessary to add additional text in this regard.
b) Chapter 15, Biodiversity Natural Heritage and Green Infrastructure refers to ecosystems services with a number of objectives enphasising its importance such as

Biodiversity and Habitat Protection, Objective CDP 15.12 b) states

To protect and promote the sustainable management of the natural heritage, flora and fauna of the County both within protected areas and in the general landscape through the promotion of biodiversity, the conservation of natural habitats, the enhancement of new and existing habitats, and through the integration of Green Infrastructure (GI) and ecosystem services including landscape, heritage, biodiversity and management of invasive and alien species into the Development Plan;

Reference to Blue Infrastructure will be added to this objective.

Urban Ecology Objective 15.13 states

a) To encourage and, where appropriate, enhance the provision of biodiversity features in urban areas through the preparation of local areas plans/settlement plans, green infrastructure strategies, ecosystem services, and through the development management process.

There is also a section 15.3 on Green Infrastructure and Climate Change referring to ecosystem services.

Flood risk mapping is shown on Volume II maps, where it is deemed appropriate. Within the Volume 3 settlement plans site specific text is provided in relation to sites where flood risk is a factor and I believe this sufficient.

Chief Executive's Recommendation

Recommendation 1
Update the Serviced Land Assessments Tables to identify whether land is Tier 1 or Tier 2. Update the SLA to reflect changes to zoning. See revised table in Appendix 1 of this submission.

Recommendation 2
See response to OPR submission S2-014

Recommendation 3
See response to OPR submission S2-014 revised Core Strategy Table

Recommendation 4
See response to OPR submission S2-014 revised Core Strategy Table

Recommendation 5
See additional text to be added to Compact Growth as per OPR submission S2-014

Recommendation 6
Include the following text and diagram in Chapter 6 Economic Development and Enterprise before the first paragraph of 6.2 Economic Development and Entreprise

The Regional Economic Strategy as set out in the RSES is based on the following economic principles.

- Smart Specialisation
  Smart Specialisation brings together key stakeholders to identify the competitive advantages of an area with the view of developing economic opportunities
- Clustering
- Clusters are a geographic or virtual concentration of interrelated companies, suppliers, and associated institutions. Fostering modern cluster policies is a strong feature of the Region's economic strategy.
- Placemaking for enterprise development
  Placemaking policy is instrumental to ensuring that sufficient human capital and talent is captured.
- Knowledge Diffusion,
  "knowledge diffusion" is the spreading of knowledge - the process of knowledge transfer to different segments of society to develop a region's human capital.
- Capacity Building
  An inherent part of the economic strategy is the building of capacity to enable effective implementation and to respond to emerging challenges.



These principle are supported and informs the Economic Strategy as set out in this Plan.

Recommendation 9
b) To protect and promote the sustainable management of the natural heritage, flora and fauna of the County both within protected areas and in the general landscape through the promotion of biodiversity, the conservation of natural habitats, the enhancement of new and existing habitats, and through the integration of Green Infrastructure (GI), Blue Infrastructure and ecosystem services including landscape, heritage, biodiversity and management of invasive and alien species into the Development Plan;

Appendix 1

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Ennis~~	~~R1~~	~~2.00~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~14.92~~	~~1~~	~~1~~	~~2~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~0.79~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R4~~	~~2.17~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R5~~	~~0.43~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R6~~	~~0.53~~	~~1~~	~~1~~	~~2~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R7~~	~~0.58~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R8~~	~~0.67~~	-	-	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R9~~	~~2.29~~	~~1~~	~~1~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R10~~	~~3.15~~	~~2~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R11~~	~~0.68~~	~~2~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R12~~	~~3.62~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R13~~	~~12.81~~	~~2~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R14~~	~~0.95~~	~~1~~	~~1~~	~~2~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R15~~	~~6.01~~	~~1~~	~~1~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R16~~	~~1.60~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R17~~	~~1.20~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R18~~	~~1.63~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R19~~	~~1.30~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R20~~	~~0.42~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	-	~~57.78~~	-	-	-	-	-	-	-

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Ennis~~	~~LDR1~~	~~1.01~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR2~~	~~2.33~~	~~2~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR3~~	~~1.97~~	~~1~~	~~1~~	~~2~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR4~~	~~3.96~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR5~~	~~1.28~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR6~~	~~0.77~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR7~~	~~10.12~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR8~~	~~0.94~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR9~~	~~1.02~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR10~~	~~6.54~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~LDR11~~	~~2.67~~	~~2~~	~~2~~	~~2~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	-	~~32.60~~	-	-	-	-	~~-~~	~~-~~	~~-~~

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Ennis	R1	2.00	1	1	1	1	√	√	√	√	
	R2	14.92	1	1	2	1	√	√	√		√
	R3	0.79	1	1	1	1	√	√	√	√	
	R4	2.17	1	1	1	1	√	√	√	√	
	R5	2.33	1	1	2	2	√	√	√		√
	R6	0.53	1	1	2	1	√	√	√		√
	R7	0.58	1	1	1	1	√	√	√	√	
	R8	0.67	1	1	1	1	√	√	√	√	
	R9	4.83	1	1	2	2	√	√	√		√
	R10	3.15	2	2	2	2	√	√	√		√
	R11	0.68	2	2	1	1	√	√	√		√
	R12	2.92	1	1	1	2	√	√	√		√
	R13	7.54	2	2	2	2	√	√	√		√
	R14	0.95	1	1	2	1	√	√	√		√
	R15	1.04	1	1	2	1	√	√	√		√
	R16	1.01	1	1	2	2	√	√	√		√
	R18	1.63	1	1	1	2	√	√	√		√
	R19	1.08	1	1	1	2	√	√	√		√
		48.84									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Ennis	LDR1	1.01	1	1	1	2	√	√	√		**√**
	LDR2	1.57	2	2	2	2	√	√	√		**√**
	LDR3	1.20	1	1	2	1	√	√	√		**√**
	LDR4	3.96	1	1	1	1	√	√	√	**√**	
	LDR5	1.28	1	1	1	1	√	√	√	**√**	
	LDR6	1.65	1	1	1	2	√	√	√		**√**
	LDR7	10.12	2	2	1	2	√	√	√		**√**
	LDR8	0.94	1	1	1	1	√	√	√	**√**	
	LDR9	1.02	1	1	1	2	√	√	√		**√**
	LDR10	6.54	1	1	1	2	√	√	√		**√**
	LDR11	2.67	2	2	2	1	√	√	√		**√**
	LDR12	1.37	1	2	1	1	√	√	√		**√**
	LDR13	1.59	1	1	1	1	√	√	√	**√**	
		34.91									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Ennis	SR1	2.44	2	2	2	2	√	√	√		**√**
	SR2	5.69	2	2	2	2	√	√	√		**√**
	SR3	2.36	2	2	1	2	√	√	√		**√**
	SR4	4.45	2	2	2	2	√	√	√		**√**
	SR5	5.82	2	2	2	2	√	√	√		**√**
	SR8	3.98	1	1	1	2	√	√	√		**√**
	SR9	2.43	1	1	1	1	√	√	√	**√**	
		27.17									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Sixmilebridge~~	~~R1~~	~~1.55~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R2~~	~~2.72~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R3~~	~~0.51~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R4~~	~~1.56~~	~~1~~	~~2~~	~~2~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R5~~	~~0.93~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~-~~	~~7.26~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Bunratty~~	~~R1~~	~~2.44~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R2~~	~~1.85~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~-~~	~~4.29~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Clonlara~~	~~R1~~	~~2.59~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.7~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~1.22~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~-~~	~~4.51~~	~~-~~	~~-~~	~~1~~	~~-~~	~~-~~	~~-~~	~~-~~

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Athlunkard~~	~~R1~~	~~2.46~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~2.46~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~-~~	~~4.92~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Ballycannon~~	~~R1~~	~~1.73~~	~~1~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~-~~	~~1.73~~	-	-	-	-	-	-	-

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Parteen~~	~~R1~~	~~0.89~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~1.71~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~-~~	~~2.6~~	-	-	-	-	-	-	-

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Newmarket on Fergus~~	~~R1~~	~~0.74~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~2.12~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~2.95~~	~~2~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R4~~	~~1.01~~	-	-	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~-~~	~~6.82~~	-	-	-	-	-	-	-

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Sixmilebridge	**R1**	1.55	1	2	1	1	√	√	√		**√**
	R2	2.72	1	1	1	1	√	√	√	**√**	
	R3	0.51	1	2	1	1	√	√	√		**√**
	R4	1.56	1	2	2	1	√	√	√		**√**
	R5	0.93	1	1	1	2	√	√	√		**√**
		7.26									
	SR1	5.37	1	2	1	2	√	√	√		**√**
	SR2	1.21	1	2	1	1	√	√	√		**√**
	SR3	2.76	2	2	1	1	√	√	√		**√**
	SR4	3.76	2	2	1	2	√	√	√		**√**
		13.11									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Bunratty	**R1**	2.44	1	1	1	2	√	√	√		**√**
	R2	1.85	1	2	1	1	√	√	√		**√**
		4.29									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Clonlara	**R1**	2.59	1	1	1	1	√	√	√	**√**	
	R2	0.7	1	2	1	1	√	√	√		**√**
	R3	1.22	1	1	1	1	√	√	√	**√**	
		4.51			1						
	SR1	5.26	1	1	1	1	√	√	√	**√**	
		5.26									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Athlunkard	**R1**	2.46	1	1	1	2	√	√	√		**√**
	R2	2.46	1	1	1	1	√	√	√	**√**	
		4.92									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Ballycannon	**R1**	1.73	1	2	1	2	√	√	√		**√**
		1.73									
	SR1	2.25	1	1	1	2	√	√	√		**√**
	SR2	2.88	2	2	1	2	√	√	√		**√**
		5.13									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Parteen	**R1**	0.89	1	1	1	1	√	√	√	**√**	
	R2	1.71	1	2	1	1	√	√	√		**√**
		2.6									
	SR1	**1.06**	2	2	1	1	√	√	√		**√**
	SR2	1.64	1	2	1	2	√	√	√		**√**
		2.71									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Newmarket on Fergus	**R1**	0.74	1	1	1	1	√	√	√	**√**	
	R2	2.12	2	2	1	2	√	√	√		**√**
	R3	2.95	2	2	2	2	√	√	√		**√**
	R4	1.01			1	2	√	√	√		
		6.82									
	SR1	3.41	2	2	1	2	√	√	√		**√**
	SR3	2.94	2	2	2	1	√	√	√		**√**
		6.35									

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Scarriff Tuamgraney~~	~~R1~~	~~3.48~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.3~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R3~~	~~0.86~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R4~~	~~1.44~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
~~-~~	~~-~~	~~6.08~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Killaloe~~	~~R1~~	~~1.39~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R2~~	~~0.99~~	~~1~~	~~1~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R3~~	~~0.95~~	~~1~~	~~1~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R5~~	~~1.96~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~R6~~	~~0.58~~	~~1~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
~~-~~	~~-~~	~~5.87~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~	~~-~~

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Tulla~~	~~R1~~	~~2.61~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
-	~~R2~~	~~2.12~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	~~R3~~	~~1.03~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	-	~~5.77~~	-	-	-	-	-	-	-

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Crusheen~~	~~R1~~	~~1.32~~	~~2~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
-	~~R2~~	~~2.97~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	-	~~4.29~~	-	-	-	-	-	-	-

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Feakle~~	~~R1~~	~~0.97~~	~~2~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	~~R2~~	~~0.33~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	~~R3~~	~~0.79~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	-	~~2.09~~	-	-	-	-	-	-	-

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Kilkishen~~	~~R1~~	~~1.34~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	~~R2~~	~~1.47~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	-	~~2.82~~	-	-	-	-	-	-	-

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Mountshannon~~	~~R1~~	~~1.73~~	~~1~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
-	-	~~1.73~~	-	-	-	-	-	-	-

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Quin~~	~~R1~~	~~1.85~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	~~R2~~	~~2.29~~	~~1~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
-	~~R3~~	~~1.06~~	~~1~~	~~1~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
-	-	~~5.21~~	-	-	-	-	-	-	-

Settlement	Ref	Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development
~~Whitegate~~	~~R1~~	~~0.39~~	~~1~~	~~1~~	~~2~~	~~1~~	~~√~~	~~√~~	~~√~~
-	~~R2~~	~~0.64~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	~~R3~~	~~0.38~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
-	-	~~1.42~~	-	-	-	-	-	-	-

Settlement	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development	Tier1	Tier2
Scarriff Tuamgraney	**R1**	3.48	2	2	1	2	√	√	√		**√**
	R2	0.30	1	1	1	1	√	√	√	**√**	
	R3	0.86	1	1	1	1	√	√	√	**√**	
	R4	1.44	1	1	1	1	√	√	√	**√**	
		6.08									
	SR1	3.46	1	1	1	1	√	√	√	**√**	
	SR2	4.59	1	1	1	1	√	√	√	**√**	
	SR3	2.03	1	1	1	2	√	√	√		**√**
		10.08									

Settlement	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development	Tier1	Tier2
Killaloe	**R1**	1.39	2	2	1	2	√	√	√		**√**
	R2	0.99	1	1	2	2	√	√	√		**√**
	R3	1.16	1	1	2	2	√	√	√		**√**
	R4	0.58	1	2	1	2	√	√	√		**√**
	R5	1.96	1	1	1	2	√	√	√		**√**
		6.08									
	SR1	2.26	2	2	1	2	√	√	√		**√**
	SR2	1.05	1	1	1	2	√	√	√		**√**
	SR3	0.32	1	2	2	2	√	√	√		**√**
		3.63									

Settlement	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development	Tier1	Tier2
Tulla	**R1**	2.61	1	1	1	2	√	√	√		**√**
	R2	2.12	1	1	1	1	√	√	√	**√**	
	R3	1.03	1	2	1	1	√	√	√		**√**
		5.77									
	SR1	1.69									
	SR2	2.10	1	2	1	1	√	√	√		**√**
	SR3	2.38									
		6.17									

Settlement	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development	Tier1	Tier2
Crusheen	**R1**	1.32	2	2	2	2	√	√	√		**√**
	R2	2.97	1	2	1	1	√	√	√		**√**
		4.29									
	SR1	3.04	2	2	2	2	√	√	√		**√**
	SR2	2.02	1	2	1	1	√	√	√		**√**
	SR3	0.89	2	2	2	2	√	√	√		**√**
		5.96									

Settlement	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development	Tier1	Tier2
Feakle	**R1**	0.97	2	2	1	1	√	√	√		**√**
	R2	0.33	1	2	1	1	√	√	√		**√**
	R3	0.79	1	1	1	1	√	√	√	**√**	
		2.09									
	SR1	0.46	1	2	1	1	√	√	√		**√**
		0.46									

Settlement	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated evelopment	Tier1	Tier2
Kilkishen	**R1**	1.34	1	1	1	1	√	√	√	**√**	
	R2	1.47	1	2	1	1	√	√	√		**√**
		2.82									
	SR1	0.40	1	1	1	1	√	√	√	**√**	
	SR2	1.51	2	2	1	2	√	√	√		**√**
		1.91									

Settlement	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development	Tier1	Tier2
Mountshannon	**R1**	1.73	1	2	1	2	√	√	√		**√**
		1.73									
	SR1	1.47	2	2	2	2	√	√	√		**√**
	SR2	0.90	1	1	2	1	√	√	√		**√**
		2.36									

Settlement	Ref	Area(ha)	Roads	Footpath	Water supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development	Tier1	Tier2
Quin	**R1**	1.85	1	2	1	1	√	√	√		**√**
	R2	2.29	1	2	2	2	√	√	√		**√**
	R3	1.06	1	1	2	2	√	√	√		**√**
		5.21									
	SR1	1.18	2	2	2	2	√	√	√		**√**
	SR2	1.23	2	2	2	2	√	√	√		**√**
	SR3	1.49	2	2	2	2	√	√	√		**√**
		3.90									

Settlement	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated Development	Tier1	Tier2
Whitegate	**R1**	0.39	1	1	2	1	√	√	√		**√**
	R2	0.64	1	1	1	1	√	√	√	**√**	
	R3	0.38	1	1	1	1	√	√	√	**√**	
		1.42									
	SR1	0.78	1	2	1	2	√	√	√		**√**
	SR2	0.73	1	2	1	2	√	√	√		**√**
	SR3	0.99	1	2	1	1	√	√	√		**√**
		2.50									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Ennistymon~~	~~R1~~	~~1.73~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.75~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~1.17~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R4~~	~~0.96~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R5~~	~~0.99~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R6~~	~~0.77~~	~~2~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
		~~6.38~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Kilrush~~	~~R1~~	~~0.69~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~1.36~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~1.76~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R4~~	~~0.99~~	~~2~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R5~~	~~1.28~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R6~~	~~2.05~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R7~~	~~1.03~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R8~~	~~2.15~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R9~~	~~1.01~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
		~~12.32~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Kilkee~~	~~R1~~	~~0.34~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~1.33~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~0.56~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R4~~	~~1.29~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R5~~	~~1.40~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R6~~	~~1.40~~	~~2~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R7~~	~~0.90~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
		~~7.21~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Lisdoonvarna~~	~~R1~~	~~1.82~~	~~1~~	~~1~~	~~2~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~1.99~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
		~~3.81~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Miltown Malbay~~	~~R1~~	~~0.39~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~2.10~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
		~~2.48~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Ballyvaughan~~	~~R1~~	~~0.75~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.90~~	~~1~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~0.94~~	~~2~~	~~2~~	~~2~~	~~2~~	~~√~~	~~√~~	~~√~~
		~~2.58~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Corofin~~	~~R1~~	~~1.36~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~1.92~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~0.30~~	~~2~~	~~2~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
		~~3.58~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Doonbeg~~	~~R1~~	~~1.56~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.56~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~0.99~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
		~~3.11~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Inagh~~	~~R1~~	~~0.40~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.61~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
		~~1.00~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Mullagh~~	~~R1~~	~~0.68~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.58~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
		~~1.26~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Quilty~~	~~R1~~	~~0.63~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.48~~	~~2~~	~~2~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
		~~1.11~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Liscannor~~	~~R1~~	~~0.64~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.80~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
		~~1.44~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Kilfenora~~	~~R1~~	~~0.70~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.38~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~0.40~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
		~~1.47~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development
~~Lahinch~~	~~R1~~	~~0.92~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R2~~	~~0.65~~	~~1~~	~~1~~	~~1~~	~~1~~	~~√~~	~~√~~	~~√~~
	~~R3~~	~~1.71~~	~~1~~	~~1~~	~~1~~	~~2~~	~~√~~	~~√~~	~~√~~
		~~3.28~~							

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Ennistymon	**R1**	1.73	2	2	1	2	√	√	√		**√**
	R2	0.75	1	1	1	2	√	√	√		**√**
	R3	1.17	2	2	1	2	√	√	√		**√**
	R4	0.96	1	1	1	2	√	√	√		**√**
	R5	0.99	1	1	1	1	√	√	√	**√**	
	R6	0.77	2	1	1	2	√	√	√		**√**
		6.38									
	SR1	0.51	2	2	1	2	√	√	√		**√**
	SR2	0.58	1	1	1	2	√	√	√		**√**
	SR3	1.13	2	2	1	2	√	√	√		**√**
	SR4	1.16	1	1	1	2	√	√	√		**√**
	SR5	2.60	2	2	2	1	√	√	√		**√**
		5.96									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Kilrush											
	R1	0.69	1	1	1	1	√	√	√	**√**	
	R3	1.76	1	1	1	1	√	√	√	**√**	
	R4	0.99	2	2	2	2	√	√	√		**√**
	R5	1.28	1	1	1	2	√	√	√		**√**
	R6	2.05	1	1	1	1	√	√	√	**√**	
	R7	1.03	1	1	1	1	√	√	√	**√**	
	R8	2.15	1	1	1	2	√	√	√		**√**
	R9	1.01	1	1	1	1	√	√	√	**√**	
		12.79									
	SR1	2.18	2	2	2	2	√	√	√		**√**
	SR2	1.05	1	1	1	1	√	√	√	**√**	
	SR3	1.08	2	2	2	1	√	√	√		**√**
		4.31									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Kilkee	**R1**	0.34	1	1	1	2	√	√	√		**√**
	R2	1.33	1	1	1	2	√	√	√		**√**
	R3	0.56	1	1	1	2	√	√	√		**√**
	R4	1.29	1	1	1	2	√	√	√		**√**
	R5	1.40	1	1	1	2	√	√	√		**√**
	R6	1.40	2	2	2	2	√	√	√		**√**
	R7	0.90	2	2	1	2	√	√	√		**√**
		7.21									
	SR1	1.71	2	2	2	**2**	√	√	√		**√**
	SR2	1.79	1	1	1	2	√	√	√		**√**
		3.50									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Lisdoonvarna	**R1**	1.82	1	1	2	1	√	√	√		**√**
	R2	1.99	1	2	1	1	√	√	√		**√**
		3.81									
	SR2	3.15	1	2	1	1	√	√	√		**√**
	SR3	1.29	1	1	1	1	√	√	√	**√**	
	SR4	1.56	1	1	2	1	√	√	√		**√**
	SR5	1.49	2	2	2	1	√	√	√		**√**
		7.49									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Miltown Malbay	**R1**	0.39	1	1	1	1	√	√	√	**√**	
	R2	2.10	1	1	1	2	√	√	√		**√**
		2.48									
	SR1	2.05	1	1	2	2	√	√	√		**√**
	SR2	1.95	1	1	1	2	√	√	√		**√**
	SR3	3.02	2	2	1	**2**	√	√	√		**√**
		7.02									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Ballyvaughan	**R1**	0.75	1	2	1	1	√	√	√		**√**
	R2	0.90	1	2	1	1	√	√	√		**√**
	R3	0.94	2	2	2	2	√	√	√		**√**
		2.58									
	SR1	1.56	1	2	1	1	√	√	√		**√**
	SR2	0.99	2	2	2	2	√	√	√		**√**
	SR3	0.87	1	2	2	2	√	√	√		**√**
		3.42									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2
Corofin	**R1**	1.36	1	1	1	1	√	√	√	**√**	
	R2	1.92	1	1	1	1	√	√	√	**√**	
	R3	0.30									
		3.58									
	SR1	0.74	2	2	1	1	√	√	√		**√**
	SR2	0.32	2	2	2	2	√	√	√		**√**
	SR3	0.52	1	1	2	2	√	√	√		**√**
	SR4	0.33	2	2	2	2	√	√	√		**√**
	SR5	1.85	1	1	1	1	√	√	√	**√**	**√**
		3.76									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Doonbeg	**R1**	1.56	1	1	1	1	√	√	√	**√**	
	R2	0.56	1	1	1	2	√	√	√		**√**
	R3	1.00	1	1	1	2	√	√	√		**√**
		2.98									
	SR1	1.42	2	2	2	2	√	√	√		**√**
	SR2	0.55	2	2	1	2	√	√	√		**√**
	SR3	3.55	1	1	1	2	√	√	√		**√**
		5.52									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Inagh	**R1**	0.40	1	1	1	1	√	√	√	**√**	
	R2	0.61	1	1	1	1	√	√	√	**√**	
		1.00									
	SR1	2.12	2	2	**1**	**1**	√	√	√		**√**
	SR2	1.49	1	1	**1**	**2**	√	√	√		**√**
		3.62									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Mullagh	**R1**	0.68	1	1	1	1	√	√	√	**√**	
	R2	0.58	1	1	1	1	√	√	√	**√**	
		1.26									
	SR1	1.22	1	2	1	1	√	√	√		**√**
	SR2	1.01	1	1	1	1	√	√	√	**√**	
		2.23									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Quilty	**R1**	0.63	1	1	1	1	√	√	√	**√**	
	R2	0.48	2	2	1	2	√	√	√		**√**
		1.11									
	SR1	1.30	1	2	1	1	√	√	√		**√**
	SR2	0.80	1	1	2	1	√	√	√		**√**
		2.11									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Liscannor	**R1**	0.64	1	1	1	1	√	√	√	**√**	
	R2	0.80	1	1	1	1	√	√	√	**√**	
		1.44									
	SR1	1.49	1	1	1	1	√	√	√	**√**	
	SR2	1.30	1	1	1	2	√	√	√		**√**
		2.79									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Kilfenora	**R1**	0.70	1	1	1	2	√	√	√		**√**
	R2	0.38	1	1	1	1	√	√	√	**√**	
	R3	0.40	1	1	1	1	√	√	√	**√**	
		1.47									
	SR1	1.14	2	2	1	2	√	√	√		**√**
	SR2	1.23	2	2	1	2	√	√	√		**√**
	SR3	1.45	2	2	2	1	√	√	√		**√**
	SR4	0.50	2	2	1	1	√	√	√		**√**
	SR5	0.49	2	2	1	2	√	√	√		**√**
		4.81									

Settlements	Ref	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier 2
Lahinch	**R1**	0.92	1	1	1	1	√	√	√	**√**	
	R2	0.65	1	1	1	1	√	√	√	**√**	
	R3	1.71	1	1	1	2	√	√	√		**√**
		3.28									
	SR1	3.23	1	2	1	1	√	√	√		**√**
	SR2	0.95	2	2	2	2	√	√	√		**√**
	SR3	1.11	1	1	1	1	√	√	√	**√**	
		5.29									

Submission No: S2/001 –Environmental Protection Agency (EPA)	
Relevant Chapters / Topics	• **Written Statement** • **Settlement Plans** • **Environmental Protection** • **Strategic Environmental Report**

Summary of Issues Raised in Submission

This submission outlines the EPA's requirements and suggestions in relation to the Draft Plan and SEA Environmental Report.

The EPA refers to their Guidelines *SEA of Local Authority Land Use Plans – EPA Recommendations and Resources* which sets out their key recommendations for integrating environmental considerations into Land Use Plans and suggests that this guidance is taken into account and the relevant recommendations incorporated in finalising and implementing the Plan.

Environmental Report

The EPA acknowledge the comprehensive Strategic Environmental Assessment undertaken, welcomes the inclusion of a specific Strategic Environmental Assessment/Environmental Report for the Clare Renewable Energy Strategy as well as the strong SEA commitments included in the Clare Wind Energy Strategy and to the Shannon Integrated Framework Plan for the Shannon Estuary.

Provides general comments on the identification and implementation of appropriate mitigation measures and considers that the monitoring programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise and to ensure that suitable and effective remedial action is taken.

Specific Comments on the Scoping Report

Makes reference to a number of documents such as *State of the Environment Report – Ireland's Environment 2020* as well as other considerations to be considered in preparing the Plan and SEA, as follows:

- **Community Engagement** - the need to proactively engage local communities.
- **Sustainable Development Goals (SDGs)** - Relevant targets and actions in Ireland's SDG Implementation Plan (DCCAE, 2018) should be integrated as appropriate into the Plans.
- **Critical service infrastructure** - Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.
- **Integration of transport & land-use planning -** need for compact growth and better integration of transport and land-use planning, including walking and cycling infrastructure, public transport, park-and-ride facilities, etc.
- **Biodiversity** - include specific actions/objectives and commitments to protect designated habitats and protected species (and associated ecological corridors/linkages) within, and adjacent to, the Plan area.
- **Coastal Zone Management** - Include specific coastal zone management objectives and consider future climate scenarios in terms of predicted higher sea levels and increased frequency of storm conditions and associated flooding; Ensure the protection of ecological buffers/marshlands/estuaries, in order that the effects of coastal squeeze on protected

species/designated habitats can be managed appropriately where possible. The role which estuaries and marshes play in terms of flood alleviation could also be highlighted.

- **Climate Action** - ensure that the Plan aligns with national commitments on climate change mitigation and adaptation, including those set out in the *Climate Action Plan 2019,* as well as incorporating any relevant recommendations and measures in sectoral, regional and local climate adaptation and mitigation plans, including the following key climate related aspects:
    - Direct and indirect impacts of the Plan on greenhouse gas emissions and removals (Mitigation);
    - Direct and indirect impacts of climate change on the implementation of the Plan, e.g. the resilience of critical water service infrastructure to flooding and drought (Adaptation);
    - The linkages between mitigation and adaptation (inter-relationships).
- **Key Plans and Programmes** - Provides details of suggested national/regional/sectoral plans to consider as well as available online guidance and resources and several Environmental webtools.

Chief Executive's Response

I thank the EPA for their submission.

I note comments relating to mitigation measures, monitoring, future amendments to the Plan together with the preparation of the SEA Statement, all of which will be taken into consideration in the completion of the development plan preparation process.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/002 –Transport Infrastructure Ireland	
Relevant Chapters / Topics	• **Access and Movement** • **Physical Infrastructure**

Summary of Issues Raised in Submission

MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

Core Strategy

The N18/M18 road within Clare is part of the planned 'Comprehensive Network' of the EU's Trans-European Network – Transport (TEN-T). The planned 'Comprehensive Network' of TEN-T is to be delivered by 2050.

The N19 & N67/N68/N85 provide important regional and inter-regional connectivity, including critical international connectivity.

Chapter 7 of the National Development Plan (2021-2030) concerns 'Enhanced Regional Accessibility' - this is a key sectoral priority – to maintain Ireland's existing national road network to a robust and safe standard for road users.

The policy basis for TII's position regarding the national road network is to be found also in the NPF (National Strategic Objective NSO2 is mentioned), NIFTI (National Investment Framework for Transport in Ireland) and the Ministerial Guidelines; 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). The Core Strategy should reflect such strategic objectives.

The Core Strategy should include new objectives:

- "Maintain the strategic function, capacity and safety of the national road network";
- "Ensure that the existing extensive transport networks are maintained".

Local Transport Planning

TII support the intended preparation of LAPs and Local Transport Plans and would welcome consultation where there are implications for the strategic national road network in the area. It is recommended that the draft CDP confirm that LTPs are to be prepared in line with NTA/TII Guidance on Area-Based Transport Assessments (ABTAs). The findings of the LTPs are to be incorporated into the statutory LAPs. The submission seeks that the Council resolve the confusion in the draft CDP between the Ennis Mobility Plan and future Local Transport Plans.

SDZ/Airport Strategy (CDP11.19)/ CDP11.24 – Regional Freight Strategy)

TII would welcome consultation on the proposed strategies where there may be implications for the strategic national road network.

SECTION 28 GUIDANCE: SPATIAL PLANNING AND NATIONAL ROADS GUIDELINES

TII require clarification regarding Developments of National and Regional Strategic Importance (5 sites). The submission states that there is a lack of clarity in terms of 'strategic' uses to be facilitated. The technical appraisal for the 4 sites listed in previous development plans requires to be updated. Further elaboration is needed on the N19 Shannon Airport Access road proposal (new site).

The 'Exceptional Circumstances' for Existing Accesses onto National Secondary Roads in the draft CDP are at variance with the Guidelines. TII requests removal of the inconsistent aspects of same.

Objective CDP11.13 (Direct Access onto National Roads) is to be made consistent with the Ministerial Guidelines; 'Spatial Planning and National Roads Guidelines for Planning Authorities'. (TII's suggested wording is included).

The identified 'Lightly Trafficked Sections of National Secondary Routes' are acceptable to TII. The Planning Authority is to develop and agree with TII a monitoring / recording regime with regard to planning permission granted in accordance with these provisions.

TII seeks that any reference to NRA DMRB document is updated to 'TII Publications'.

Single Houses in the Countryside

TII seeks a cross-reference to Objective CDP 11.13 (the policy to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60 km/h apply) within S.4.2.5 'Single Houses in the Countryside' and S.5.2.12 'Holiday Homes'.

Strategic Economic Development Locations, including Rural Economic Development

TII recommend new objectives in Chapter 6 Economic Development and Chapter 8 Rural Economy, linking the need to safeguard the national road network with economic development proposals. There should also be a cross reference in Chapter 6 and Chapter 8 to reference Objective CDP 11.13.

Retailing

TII recommends that there is explicit policy in Chapter 7 Retail of a presumption against large out of town retail centres adjoining or close to existing, new or planned national roads/motorways (reflecting policy outlined in Retail Planning Guidelines (2012)).

TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES

TII notes the inclusion of additional schemes related to national roads included in Objective CDP11.11 – not all such schemes may be approved / funded by TII.

Recommends inclusion of a new objective to safeguard proposed national roads schemes.

Recommends that "in all instances, national road improvement schemes should be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII".

In relation to the LNDR, TII recommend that the special requirements of the N18 and Limerick Tunnel scheme should be factored into the considerations of the draft CDP. These special requirements have previously been communicated by TII to the Clare County Council CEO.

The proposed M18/Quin Road (R469) junction is not consistent with S2.7 of the Guidelines. TII does not support its inclusion in the Development Plan.

OTHER TRANSPORT PROPOSALS

It is recommended to incorporate reference to the TII publication "Treatment of Transition Zones to Towns and Villages on National Roads" in the Development Plan, in association with reference to DMURS (Objective CDP11.18).

ANCILLARY POLICY PROVISIONS AND ISSUES

Service Areas

It's recommended to include a policy position on the provision of roadside service facilities on non-motorway national roads and their junctions in the draft CDP.

National Road Network Drainage

Recommended that a new objective that national road network drainage regimes in Co. Clare are safeguarded for national road drainage purposes.

Grid Connections

Recommended to include an objective re safeguarding the national road network in relation to renewable energy proposals, including an alternative grid connection solutions.

Solar Farms

County Development Plan to make provisions for a requirement for glint and glare assessments in solar farm applications.

References to TII Publications

Section 1.2.1 and S.1.20 are referenced (they refer to the NRA)– recommended to review this to make sure of references to TII and TII publications. (The Referenced sections here appear not to be the correct sections).

Noise

Reference is required in chapter 11 of the CDP that noise mitigation measures should be included in development proposals, and that TII will not be responsible for the provision of additional noise mitigation.

Signage

At Objective CDP11.25 regarding signage, the request is to amend the reference to the *Spatial Planning and National Roads Guidelines* such that it clearly states that the DoECLG published those guidelines and not TII.

Settlement Plans / Development Strategies

Volume 3 (a) Ennis MD:

Recommends that certain zoning objectives require review prior to adoption including:

- the lands adjoining Junction 12 and Junction 13 on the M18;
- Additional motorway junction at M18 / Quin Road (CDP Objective V3 (a) 16);
- Beechpark ENT1 and TOU2;
- Zoning Objectives to West of Ennis adjoining N85 outside the area to which the 50-60kph limit applies (Not specified which zonings);
- Drumeen Cluster boundary (Kilmorane).

Volume 3 (b) Shannon MD:

Recommend Review of zoning objectives prior to adoption; including:

- Masterplan for TOU1, TOU2 and REC2 in Bunratty (how is it to be approached and adopted?);
- Ballymorris, Drumline, The Wells – cluster boundaries extend to the N18.

Volume 3 (d) West Clare MD:

Review zoning objectives prior to adoption, including:

- Ennistymon / Lahinch: R5 and SR5 lands adjoin N67 at the 100kph limit;
- Lisdoonvarna: SR1 and SR2 adjoins N67 outside the 50-60kph speed limit;
- Ballyvaughan: OP1 adjoins N67 outside the 50-60kph speed limit;
- Doonbeg: TOU1 adjoins N67 outside the 50-60kph speed limit;
- Inagh: COM2 adjoins N85 outside the 50-60kph speed limit;
- Quilty: TOU3, COM1 and C4 adjoins N67 outside the 50-60kph speed limit;
- Bellharbour: OS1/TOU3/MAR1 adjoins N67 outside the 50-60kph speed limit;
- Kilshanny: COM1 adjoins N67 outside the 50-60kph speed limit;
- Lissycasey: VGA2 adjoins N68 outside the 50-60kph speed limit;
- Spanish Point: TOU1 and TOU8 adjoins N67 outside the 50-60kph speed limit;
- Review clusters at Ballyea South, Caherea, Murtyclogh and Mount Rivers.

Chief Executive's Response

I thank Transport Infrastructure Ireland for the submission and wish to address the submission as follows:

Core Strategy

The submission requests new 'Principles' to be included as Objectives of the Core Strategy which would be associated with improvement to the national road network in accordance with National Development Plan investment objectives and safeguarding the existing networks in accordance with the provisions of official policy outlined in the NPF, NDP and Section 28 Ministerial Guidelines; 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

I note that the Core Strategy chapter contains a very limited number of Policy Objectives. The Core Strategy also sets out its Strategic Aims, which are not sectoral or topic-based, but do include "To set the context for the key infrastructure of the County and its role". In this regard, the Core Strategy includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. I consider that the plans and strategies above county level among those listed provide adequate policy support for the proposed and existing strategic national road network. Taken together with the Core Strategy Map and the content of Chapter 11 'Physical Infrastructure' of the draft CDP, I consider that the plan provides comprehensive policy support for the proposed

and existing strategic national road network. No change to the draft CDP is necessary in relation to this part of the request.

Local Transport Planning

In relation to the Local Transport Plans for Ennis, Shannon, Sixmilebridge, Kilkee, Kilrush, Lahinch, Corofin and Tulla which are to be implemented during the lifetime of the Development Plan, the Local Authority is committed to consultation with the public, TII and other statutory authorities during the preparation of the Local Transport Plans (LTPs).

Development Plan Objective CDP11.3: 'Draft Limerick-Shannon Metropolitan Area Transport Strategy and Local Transport Planning' shall be amended to confirm that the LTPs will be prepared in accordance with NTA/TII ABTA Guidance, and the findings and recommendations of any Local Transport Plans, undertaken in accordance with ABTA, should be incorporated into the preparation of the statutory Local Area Plans for Ennis and Shannon.

I recognise that Objective 4.1 'Ennis' may not be clear in relation to transport planning as it relates to Ennis. Objective 4.1 (e) states an objective to prepare a Mobility Plan for Ennis. The preparation of this plan is ongoing during 2022 and concerns certain targeted interventions in the central area of Ennis. It is the Council's intention (stated in Objective CDP11.13) to prepare a comprehensive Local Transport Plan for Ennis and to incorporate its findings and recommendations into the forthcoming statutory Local Area Plan for Ennis. This LTP will be prepared on the basis of the TII/NTA Area Based Transport Assessment (ABTA) Guidance and will concern the entire settlement of Ennis. To reflect these initiatives, it is necessary to make amendments to Policy Objective CDP 4.1. and to CDP Volume 3 (a) Objective V3 (a) 1. These changes are set out in my recommendations below.

Developments of National and Regional Strategic Importance

I note that TII require clarification regarding Developments of National and Regional Strategic Importance.

I acknowledge the concerns raised in relation to developments of national and regional strategic importance that require access onto national roads and I consider it possible to address these concerns in the County Development Plan. There are a limited number of existing sites which fall into this category in the county, namely:

- Moneypoint Power Station and the adjoining lands which are identified as a Strategic Development Location in the Strategic Integrated Framework Plan for the Shannon Estuary;
- The former Whelan's Quarry site at Fountain Cross, Ennis;
- Hotel and Golf Links, Doonbeg;
- Central Waste Management Facility, Ballyduffbeg, Inagh;
- N19 National Road between Shannon Town Roundabout and Knockbeg Point.

Potential strategic uses of the sites are listed within the draft CDP at Section 11.2.9.3, as follows:

- Moneypoint: provision of alternative sources of energy supply;
- Fountain Cross: use as a quarry; rehabilitation of the site for outdoor activity or adventure park;
- Doonbeg: intensification of existing uses;
- Inagh: renewable energy project, waste transfer and recovery facility, eco-park.

The Planning Authority have included the sites at Moneypoint, Fountain Cross, Doonbeg and Inagh in the current CDP 2017-2023, and therefore does not see merit in revisiting the technical appraisals previously undertaken.

The N19 National Road link between the Shannon Town Roundabout and Knockbeg Point at Shannon Airport has been included in the draft CDP. The Planning Authority considers that the road link in question provides access to existing residential areas, the Shannon Free Zone West and Shannon International Airport. While the road link is within the settlement of Shannon town, and is surrounded by zoned lands, speed limits of 100km/h and 80 km/h apply along certain sections of the link. In order to safeguard the potential of the Free Zone West and the Airport, as nationally and regionally-important strategic sites to accommodate further strategic development, I consider that the inclusion of the N19 National Road link as a location where exceptional circumstances to the general policy apply is appropriate.

Lightly-trafficked Sections of National Secondary Roads

The submission suggests updating the text of the Plan to reflect relevant TII guidance documents. I consider this an acceptable request. The Council is also requested to develop and agree a monitoring and recording regime related to planning permissions granted in accordance with the above provisions. This request is reasonable and will be accommodated in the draft CDP.

Exceptional Circumstances for Existing Accesses onto National Secondary Roads

I recognise the concerns that TII have raised in relation to the policy in the Draft Plan on Existing Accesses onto National Secondary Routes. In line with national policy and in the interest of traffic safety I recommend that this text is removed from the Plan.

Direct Access onto National Roads

I recognise the concerns that TII have raised in relation to the policy in the Draft Plan Objective CDP11.13 'Direct Access onto National Roads'. I consider that the revised version shown in the submission is consistent with the other amendments to be made at this section of the draft CDP, and I recommend that the text is amended as set out in the submission.

Cross-reference to CDP 11.13 Direct Access onto National Roads

The draft Development Plan includes a cross-reference at the end of Section 4.2.5, as follows:

> Note 2: Where any proposed site is accessed from a national road or certain regional roads the objectives in relation to housing in the countryside must be read in conjunction with objectives CDP 11.13 and CDP 11.14 (Chapter 11).

I do not propose to change the draft CDP in relation to this part of the request.

In relation to the proposed cross-reference to Section 5.2.12 'Holiday Homes' it is considered that cross-referencing to national roads policy is not necessary. Development Plan Objective CDP 4.19 and Section 5.2.12 provide that Holiday Homes are only permissible within certain settlements and not at all in the countryside. As a result, I consider that in the limited instances where holiday home proposals arise in settlements where the 60km/h (or lower) speed limit does not apply, the provisions of the development plan will apply to the assessment of any such applications.

I do not propose to change the draft CDP in relation to this part of the request.

Strategic Economic Development Locations, including Rural Economic Development

TII request that a new objective is included in Chapter 6 Economic Development and Chapter 8 Rural Economy, linking the need to safeguard the national road network with economic development proposals.

I do not consider that it is appropriate to include such objectives, since there is adequate policy provision for the national road network within Chapter 11 (notably Policy Objectives CDP 11.11 and CDP 11.13) that will apply to development proposals concerning the national road network.

I also disagree that there should be a cross reference in Chapter 6 and Chapter 8 to reference CDP 11.13, again because the policy objective itself will apply to development proposals of all types, including enterprise in rural areas and elsewhere.

I do not propose to change the draft CDP in relation to this part of the request.

Retailing

TII request that there is explicit policy in Chapter 7 'Retail' of a presumption against large out of town retail centres adjoining or close to existing, new or planned national roads/motorways (reflecting policy outlined in Retail Planning Guidelines (2012)). However, I note that Policy Objective CDP7.17 states:

> *It is an objective of Clare County Council*
>
> *a) To assess applications for edge-of-centre and out-of centre retail developments having regard to the criteria and considerations set out in Retail Planning – Guidelines for Planning Authorities (2012) and the Clare Retail Strategy;*
>
> *b) To apply the sequential test to development proposals for edge of centre retail developments; and*
>
> *c) To permit edge of centre retail developments only where such development will strongly integrate into the existing town centre and will not have a negative impact on the vitality and viability of the relevant town centre, and subject to normal planning requirements.*

These provisions effectively require that out-of-centre retail development proposals will be subject to the Clare Retail Strategy which forms Volume 7 of the Draft CDP. I note from the Clare Retail Strategy that the General (county-wide) Strategy at Section 7.3.1.1 includes Objective CCC05, as follows:

> *In accordance with the Retail Planning Guidelines (2012), there shall be a presumption against retail developments on edge of centre sites or out of town centre sites. Such proposals will only be considered when it has been clearly demonstrated that all viable, available and suitable sites in the core retail area have been fully investigated and considered in accordance with the Retail Planning Guidelines and in particular the sequential test.*

Additionally, at Section 7.4.4.2 'Retail Warehouses', it states that *"there should be a presumption against the further development of out of town retail parks".*

Finally, at Section 7.4.4.4 'Outlet Centres', it states that "*In accordance with the Retail Planning Guidelines, outlet centres in County Clare will not be permitted in more remote out-of-town locations".*

I consider that adequate safeguards regarding potential out-of-centre retail development in the county during the lifetime of the Plan exist in the draft Plan and I am satisfied that the requirements of the Retail Planning Guidelines 2012 have been fully met.

I do not propose to change the draft CDP in relation to this part of the request.

TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES

TII seek that the Council consider the following:

1) Inclusion of a new objective to safeguard proposed national roads schemes.
2) Recommends that "in all instances, national road improvement schemes should be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII".
3) In relation to the LNDR, TII recommend that the special requirements of the N18 and Limerick Tunnel scheme should be factored into the considerations of the draft CDP. These special requirements have previously been communicated by TII to the Clare County Council CEO.
4) The proposed M18/Quin Road junction is not consistent with S2.7 of the Guidelines. TII does not support its inclusion in the Development Plan.

In relation to items 2 and 3, the comments of TII are noted.

In relation to item 4, I acknowledge the comments by TII that it does not consider such proposals consistent with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities and that such proposals would require a Motorway Order.

In this regard, however, the Core Strategy of the draft CDP includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft Limerick and Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. I do not propose to change the draft CDP in relation to this part of the request.

In relation to Item No. 1, I consider that the suggested amendment can be accommodated within Policy Objective CDP 11.11, as an additional bullet point.

OTHER TRANSPORT PROPOSALS

TII request that reference to the TII publication "Treatment of Transition Zones to Towns and Villages on National Roads" is incorporated in the Development Plan, in association with reference to DMURS (Objective CDP11.18).

I consider that CDP11.18 can be amended to include reference to implementing the TII publication regarding Transitional Zones.

ANCILLARY POLICY PROVISIONS AND ISSUES

Service Areas

TII requests the inclusion of a policy position on the provision of roadside service facilities on non-motorway national roads and their junctions in the draft CDP.

I acknowledge the comments in regard to provision for off-line service areas at or near national road junctions and it is the intention that the Council will provide for such facilities only where it can be proven through a strong evidence-based approach that there is adequate junction capacity and that there will be no negative impact on the main-line traffic flow. Any such provision will be in accordance with Strategic Planning and National Roads Guidelines (2012) and the TII Service Area Policy (2014). I recommend that this be included within the County Development Plan, at Section 11.2.9.2 of the draft CDP, the detail of which is included in my recommendation below.

National Road Network Drainage

TII seek that a new objective is included whereby national road network drainage regimes in Co. Clare are safeguarded for national road drainage purposes. This is an acceptable request and will be included in my recommendations section below, as an additional bullet point within Policy Objective CDP 11.11 Motorways, National Roads and Strategic Inter-Urban Roads.

Grid connections

TII request that an objective is included regarding the safeguarding of the national road network in relation to the grid connections that facilitate renewable energy proposals. The submission seeks that alternative grid connection routes or other solutions are considered.

Grid connection alignments serving sites of renewable energy generation are varied in terms of their routing. It is not prudent to introduce restrictions at the policy level that may be perceived as precluding the national road network, or sections of same, from being used to route grid connections. Any constraints that may relate to the presence of grid connections can be resolved during the preparation and evaluation of the planning application.

I do not propose to change the draft CDP in relation to this part of the request.

Solar Farms

TII request that the County Development Plan make provisions for a requirement for glint and glare assessments in solar farm applications. I agree that text on Glint and Glare should be included within the provisions for Renewable Energy development within the Appendix 1 Development Management Guidelines, to provide for Glint and Glare Assessments for Solar Farms where potential for safety or efficiency issues arise with regard to the national road network. The changes will be included in my recommendations section below.

References to TII Publications in Appendix 1 (DM Guidelines)

The Reference to Sections 1.2.1 and S.1.20 within the request do not appear to be correct. However, the item concerns the text within Appendix A1.6.4 and can be amended to refer to TII and TII publications. The changes will be included in my recommendations section below.

Noise

Reference is required in chapter 11 of the CDP that noise mitigation measures should be included in development proposals, and that TII will not be responsible for the provision of additional noise mitigation.

Noise management is a highly important issue that must be properly addressed in order to ensure that any negative noise-related impacts are mitigated. This issue is already addressed in the Draft Plan under Section 11.6.1 Noise Pollution.

I do not propose to change the draft CDP in relation to this part of the request.

Signage

At Objective CDP11.25 regarding signage, the request is to amend the reference to the *Spatial Planning and National Roads Guidelines* such that it clearly states that the DoECLG published those guidelines and not TII. The changes will be included in my recommendations section below.

Settlement Plans / Development Strategies

Vol 3 (a) Ennis - Development Proposals at National Road junctions.

I note that the submission does not explicitly raise concerns about zoning at the M18 Junction 13 (Tulla Road), and indeed commends the plan-led approach to designating the site at Toureen for a Data Centre.

In relation to the zoning at Junction 12, this zoning reflects an existing planning permission that has been granted by Clare County Council (appeal currently being considered by An Bord Pleanala) and as such I consider it appropriate for this zoning to be retained.

In relation to CDP Objective V3 (a) 16 and the accompanying Table 2, the Planning Authority has included an Interchange at the Quin Road (R469) / M18, as a proposed project identified for future development. The Core Strategy of the draft CDP includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft LSMATS and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. I do not propose to change the draft CDP in relation to this part of the request.

Ennis M.D. – Other Development Proposals

There are other sites mentioned in the submission for which TII recommend that a review of their development objectives and zoning objectives take place. In relation to Beechpark ENT1 and TOU2, I note that the written objectives for both sites contain the following text:

> *Development proposals for this site must be accompanied by a Transport and Traffic Assessment undertaken in accordance with NRA/TII Traffic and Transport Assessment Guidelines (2014). This must also include an assessment of the cumulative impact of traffic/transport generated by planned development in the area on significant junctions in the vicinity.*

The inclusion of the above text provides for a robust assessment of future development on both sites at planning application stage, regarding the potential impact on the national road network. I do not propose to change the draft CDP in relation to this part of the request.

The submission notes that zoning objectives to the west of Ennis adjoining the N85 extend outside the area to which the 50-60kph limit applies. It is not specified which zonings this relates to. I do not propose to give further consideration in relation to this part of the request.

I have examined the Drumeen cluster on the basis of this submission and I note that all lands within the cluster that directly adjoin the national road are now developed and therefore I consider the current cluster boundary to delineate existing development rather than to identifying new areas for future development.

Volume 3b Shannon MD:

In relation to the draft CDP's requirement for a masterplan at the TOU1, TOU2 and REC2 sites in Bunratty, I do not consider that it is necessary to include further guidance within the Plan regarding these sites or the requirement to prepare a masterplan for the combined areas that they occupy.

In relation to the clusters at Ballymorris, Drumline (2), and The Wells, while the cluster boundaries extend to the N18 alignment, access to residences and other lands within the cluster boundary is by way of local roads and unregistered roads in each cluster:

- Ballymorris: L3118, L7122, unregistered road;
- Drumline (2): L31761;
- The Wells: L3179, L3177, unregistered road.

The boundaries of these clusters do not require further consideration in terms of impacts on the national road network.

Volume 3d West Clare MD:

Ennistymon

In relation to the zoning of lands at Ennistymon (R5 and SR5), I have reviewed the settlement plan map and I consider that these lands are accessible from an existing laneway entrance which serves the town's wastewater treatment plant. This entrance is within the 50 kph speed limit. I propose to add an Indicative Access Point arrow at this location on the Ennistymon settlement plan map.

Lisdoonvarna

In relation to the zoning of lands at Lisdoonvarna, the SR2 lands have a boundary with the N67 inside the speed limit, and therefore access to the lands does not have to be taken from a point outside the 50kph speed limit.

In relation to SR1, this site is located on the N67 National Route where the maximum speed limit applies and an entrance may not be in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities. However, it is not necessarily appropriate in every instance that the most suitable areas for the growth of small towns are those which are within the current minimum speed limits. Additionally, the lands that may be most appropriate for the growth of a small town may sometimes have access constraints, such as speed limits, which need to be addressed over time in order to guide the most appropriate long-term

growth pattern for the town. However, on balance and given the proximity of other more extensive Strategic Residential Reserve lands at this part of the town, I consider that the zoning on this site be amended to Agriculture.

Ballyvaughan

In relation to Site OP1, a former Visitor Centre and Restaurant, Ballyvaughan – although located on the N67, this is a brownfield site, the redevelopment of which would be beneficial to the surrounding area. Securing a new use for the site is also important to ensure that it does not deteriorate from a structural and visual perspective. Therefore I am satisfied that this site should remain an identified 'Opportunity Site' in the Draft Plan.

Doonbeg

The TOU1 site within Doonbeg, although alongside the N67 outside the 50-60kph speed limit, also has potential access points from the local road network within the village, which could be utilised subject to full consideration of the proper planning and development of the area within the evaluation of a planning application at the site. Therefore I am satisfied that this site should remain zoned for Tourism land uses in the Draft Plan.

Inagh

The COM2 site in Inagh adjoins the N85 partly within and partly outside the 50-60kph speed limit. The site has a section of frontage on the N85 that is within the speed limit and is c. 50m in length. There is also potential to access the site from the undeveloped Mixed Use lands to the south, via a narrow strip of land between the road and river. These provide sufficient options for a potential entrance to the lands to be located within the speed limit. Therefore I am satisfied that this site should remain zoned for Commercial land uses in the Draft Plan.

Quilty

At Quilty, the TOU3, COM1 and C4 lands adjoin the N67 outside the 50-60kph speed limit. However, these lands are in existing uses: Mobile Home Park, Filling Station and School respectively. Therefore, I am satisfied that these sites should remain zoned in accordance with their existing uses in the Draft Plan.

Bellharbour

At Bellharbour the OS1, TOU3 and MAR1 sites adjoin the N67 outside the 50-60kph speed limit. However, these lands are in existing uses: Open Space, Holiday Cottage complex and pier, respectively. Therefore, I am satisfied that these sites should remain zoned in accordance with their existing uses in the Draft Plan.

Kilshanny

The COM1 site at Kilshanny adjoins the N67 outside the 50-60kph speed limit, but is in use as a public house. Therefore, I am satisfied that this site should remain zoned for Commercial land uses in the Draft Plan.

Lissycasey

The VGA2 site at Lissycasey adjoins the N68 outside the 50-60kph speed limit. The entrances to the lands are within the 80kph maximum speed zone. It is vital that these lands are designated to accommodate the growth of the village, as the development of the lands for uses such as small scale commercial, enterprise, community, services/facilities or small scale cluster housing would

enable the compact growth of the settlement. It is not necessarily appropriate in every instance that the most suitable areas for the growth of villages are those which are within the current minimum speed limits. Additionally, the lands that are most appropriate for the growth of a village may sometimes have access constraints, such as speed limits, which need to be addressed over time in order to guide the most appropriate long-term growth pattern for the village. In this instance, it is necessary to designate an alternative entrance to the lands from the local road L2148 at the east. The lands adjacent to that road are zoned 'Agriculture'. It is recommended that a section of those lands are made part of an enlarged VGA2, such that the development potential of these lands can be realised. The text of the Lissycasey Settlement Plan shall also be amended to reflect the change in the designation of the lands.

Spanish Point

Both the TOU1 and TOU8 sites at Spanish Point adjoin the N67 outside the 50-60kph speed limit. However, both sites are fully-occupied by long-established mobile home parks, and also by holiday cottages in the case of TOU8. Therefore I am satisfied that these sites should remain zoned for Tourism land uses in the Draft Plan.

Ballyea South cluster

I note that all of the lands in the Ballyea South cluster can be accessed from the L-10941 local road, with the exception of a small area of land to the north of the cluster. I recommend that the cluster boundary be marginally altered to exclude this small area from the cluster.

Caherea cluster

I note that all lands in this cluster can be accessed from the local road network.

Murtyclogh cluster

I note that all lands in this cluster can be accessed from the local road network.

Mount Rivers cluster

I note that all undeveloped lands in this cluster can be accessed from the local road L2032 which runs north-south through the middle of the cluster.

Chief Executive's Recommendation

Volume 1 Development Plan Objective CDP11.3: 'Draft Limerick-Shannon Metropolitan Area Transport Strategy and Local Transport Planning' shall be amended as follows:

It is an objective of Clare County Council:

a) To implement the Draft Limerick Shannon Metropolitan Area Transport Strategy during the lifetime of this Development Plan;

b) To implement a Local Transport Plan for Ennis, Shannon, Sixmilebridge, Kilkee, Kilrush, Lahinch, Corofin and Tulla during the lifetime of this Development Plan;

c) that the Local Transport Plans will be prepared in accordance with the TII/NTA Area Based Transport Assessment (ABTA) Guidance;

d) that the findings and recommendations of any Local Transport Plans, undertaken in accordance with ABTA, will be incorporated into the preparation of the statutory Local Area

Plans, where relevant; and

~~c~~ e) To work in close co-operation with Technical University of the Shannon: Midlands Midwest and the Endurance European network.

Volume 1 Development Plan Objective CDP4.1: 'Ennis' shall be amended as follows:

It is an objective of Clare County Council:

c) To prepare and implement a local area plan for the Ennis Town and Environs area incorporating a Local Transport Plan, a Strategic Environmental Assessment and an Appropriate Assessment during the lifetime of this Development Plan.

(Note that this also has the effect of amending CDP Objective V3 (a) 1, which is intended to be a consistently-worded Objective to CDP4.1. The text of both objectives was not identical in the draft CDP, but I am prompted by this submission to ensure that they are made consistent. The full, reconciled, wording of both objectives is contained in the section of my recommendations dealing with Volume 3a, below).

Volume 1, Section 11.2.9.3 – subsection on Lightly-trafficked Sections of National Secondary Roads

– amendment to text of second paragraph:

All safety issues and considerations are adequately addressed in accordance with ~~the NRA's Design Manual for Roads and Bridges~~ TII Publications.

- Addition of third paragraph:
  The Planning Authority will develop and agree with TII a monitoring and recording regime related to planning permissions granted in accordance with the above provisions.

Volume 1, Section 11.2.3.3 subsection on Existing Access onto National Secondary Routes – remove the following text:

~~A less restrictive approach will be applied to existing accesses onto national secondary roads where a balance needs to be struck between the important transport function of such roads and the social and economic development of the areas through which they pass.~~

~~The Council will give consideration to individual rural house developments utilising existing accesses onto national secondary roads in the following circumstances:~~

~~• There are no alternative sites available with access off a regional or local road;~~

~~• The development will not undermine the strategic transport function of the national road network, will not result in the premature obsolesce of the network, and where applicable will not compromise the carrying capacity at adjacent road junctions;~~

~~• The location of the proposed access is at a point on the National Road Network where there are no plans for future upgrades;~~

~~• All safety issues and considerations are adequately addressed in accordance with the~~

~~NRA's Design Manual for Roads and Bridges;~~

~~• The development fully complies with the objectives set out in Chapter 4 of this Plan – Urban and Rural Settlement Strategy;~~

~~• There is a genuine need for the dwelling proposed; and~~

~~• The proposed development would not create an undesirable precedent for further development in the area.~~

Volume 1: Amend Objective CDP11.13 'Direct Access onto National Roads' as follows:

Objective CDP11.13: 'It is an objective of Clare County Council:

a) To safeguard the safety, efficiency and carrying capacity of national primary and secondary roads, including associated national road junctions, within the County in line with national policy;

b) To restrict individual accesses, and the intensification of existing access, onto national roads in order to protect the substantial investment in the national road network, to improve carrying capacity, efficiency and safety, and to prevent the premature obsolescence of the network;

c) To assess development proposals requiring direct access onto the national road network having regard to the criteria set out in Section 11.2.9.3; and

d) To subject any proposals for greenways, new routes and trails to screening for appropriate assessment and an ecological impact assessment where appropriate to ensure that the design and operation of the proposal is in full compliance with the EU Habitats Directive.

Volume 1: Amend Objective CDP11.11 'Motorways, National Roads and Strategic Inter-Urban Roads', as follows:

Development Plan Objective: **Motorways, National Roads and Strategic Inter-Urban Roads**	
CDP11.11	It is an objective of Clare County Council: a) To safeguard the motorway, national roads and strategic regional inter-urban road connections between cities, settlements, ports and airports, and their associated road junctions, in line with national policy; b) To protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan and to prohibit development that could prejudice their future delivery;

		~~b~~c) To support the upgrade and improvement of motorways, national roads and strategic regional inter-urban road connections and their associated junctions, subject to compliance with requirements of the Habitats Directive and in compliance with the environmental requirements of Objectives CDP11.17 and CDP3.1; ~~c~~d) To advocate for and support improved road connectivity and, in particular, to advocate for • The Limerick Northern Distributor Route (LNDR) connecting the N18 to M7; • A new interchange on the M18 at Quin Road Ennis; • An upgrade of the Ennis to Kilrush N68 National Secondary Route; • An upgrade/extension of the N19 to Shannon International Airport; • Provision of a new bridge crossing at N67/N85 Blakes Corner Ennistymon; and • The N85 Kilnamona Road Improvement Scheme. ~~d~~e) To sustainably maintain, support and enhance Clare's connectivity on the Trans European Transport Network. ~~e~~f) To ensure that the national road network drainage regimes in Co. Clare are safeguarded for national road drainage purposes.

Volume 1, Amend Objective CDP 11.18, as follows:

Development Plan Objective: Design Manual for Urban Roads and Streets (DMURS) and Transition Zones to Towns and Villages on National Roads.	
CDP11.18	It is an objective of Clare County Council: (a) To implement the requirements and recommendations contained in *DMURS* in the assessment of development proposals, the preparation of design schemes and their implementation in the development of streets, roads and public realm improvement schemes in the County, and (b) To implement the requirements and recommendations contained in TII Publications

		Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' in the assessment of development proposals, the preparation of design schemes and their implementation in the development of streets, roads and public realm improvement schemes where applicable.

Volume 1 Amend Section 11.2.9.2 Motorway Service and Rest Areas, as follows:

Motorway service and rest areas are essential for driver safety and to ensure the availability of services and amenities for drivers. Transport Infrastructure Ireland (TII) has identified a need for an on-line Motorway Service Area on the M18 at a location between Junctions 7 (Sixmilebridge/Hurler's Cross) and Junction 12 (Ennis). They have identified a need for a Type 1 Service Area (full service area) at this location.

Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines (2012) provides guidance regarding off-line or roadside service facilities on non-motorway national roads and at or near their junctions. Any such facilities that are proposed within the county will be permitted only where it can be proven through a strong evidence-based approach that there is adequate junction capacity and that there will be no negative impact on the main-line traffic flow.

Volume 1 Appendix 1 DM Guidelines, amend as follows:

A1.2.3 Renewable Energy

The Planning and Development Regulations 2001 (as amended) includes planning exemptions for renewable energy technologies below certain thresholds and in different site contexts (e.g. commercial and residential). For renewable energy developments outside of these exemptions planning permission is required and the Planning Authority will assess such development proposals on a case by case basis, having regard to current Government policy and Ministerial Guidelines, the Clare Renewable Energy Strategy (Appendix 5), the Clare Wind Energy Strategy (Appendix 6), the relevant Development Plan Objectives, site specific circumstances, the content of the submissions and observation received and other planning and environmental considerations.

In relation to utility-scale solar energy applications, any pre-application discussion and/or planning application proposal for solar farm development in the vicinity of the strategic national road network shall include a Glint and Glare Assessment.

Volume 1 Appendix 1 DM Guidelines, amend as follows:

A1.6.4 Traffic Impact Assessments (TIA), Road Safety Audits and Road Safety Impact Assessments

A Traffic Impact Assessment is a comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences. The TIA should be prepared in accordance with the Traffic Management Guidelines Manual 2003 issued by the Department of Transport and the Traffic and Transport Assessment Guidelines 2014 published by ~~the NRA~~ TII. These guidelines provide guidance including thresholds and sub-thresholds above which TIA is

required. It is important that scoping of the TIA is undertaken at pre-planning consultation stage between developers and the Planning Authority.

Road Safety Impact Assessment is described in the EU Directive on Road Infrastructure Safety Management (EU RISM) 2008/96/EC as a strategic comparative analysis of the impact of a new road, or of substantial modifications to an existing road, on the safety performance of the road network. A road safety audit must be submitted as part of any planning application where the proposed development incorporates a new access to a National Road or where it may give rise to an increase in traffic to a National Road. Road Safety Audits shall be carried out independently by assessors approved by Transport Infrastructure Ireland. Further information is contained in ~~National Roads Authority/~~Transport Infrastructure Ireland publications HD19 and HA42/01.

Volume 1, Amend Objective CDP 11.25, as follows:

Development Plan Objective: **Directional Signage**	
CDP11.25	It is an objective of Clare County Council: a) To ensure that adequate directional signage is provided throughout the County to facilitate convenient movement and access between settlements and services through the County; and b) To control the proliferation of non- road traffic signage on and adjacent to national roads having regard to the ~~TII's~~ DoECLG's *Spatial Planning and National Roads Guidelines*.

Volume 3a CDP Objective V3 (a) 1 shall be amended, as follows:

CCDP Volume 3 **Settlement Plan Objective**

	Objective V3(a)1	It is an objective of Clare County Council: a) To support Ennis as a self-sustaining, regional economic driver and as a key location for investment choice in the County and the Southern Region, and to support its enhanced development based on its strategic location relative to Limerick and Galway Cities, Shannon International Airport and the Atlantic Economic Corridor as well as its role as a centre of employment and economic activity; b) To support the implementation of Ennis 2040, Economic and Spatial Strategy to set the long-term economic and spatial strategy for the County Town with an agreed focus on an economic future and spatial pattern to 2040 and beyond; c) To prepare and implement a local area plan for the Ennis Town and Environs area incorporating a Local Transport Plan, a Strategic Environmental Assessment and an Appropriate Assessment during the lifetime of this Development Plan. d) To actively work to strengthen cross sectoral collaboration with neighbouring towns and cities, strengthening physical, social and economic links with Limerick and Galway in particular; e) To seek investment and to support the delivery of holistic infrastructure that will facilitate and accommodate sustainable growth in Ennis, subject to the outcome of the planning process and environmental assessments; ~~f) To prepare a Mobility Plan for Ennis;~~ **f)** To develop Ennis into a centre for lifelong learning and to support the further development of higher education facilities in the Town; g) To support initiatives which seek to strengthen and develop niche retail and mixed-use services in Ennis town centre; h) To support and promote placemaking in Ennis which would include public realm regeneration and urban renewal initiatives which incorporate SuDs and public private partnership approaches for town centre regeneration; i) To seek the sustainable development of tourism facilities that enhance diverse tourism roles for Ennis	

	and to seek investment in services to cater for increased ~~population~~ visitor numbers ~~arising from tourism~~; j) ~~To support compact growth with the Town building on the '10 minute town' concept~~ To integrate land use and transport planning such that new employment and residential development should be consolidated in a manner which renders it serviceable by public transport and accessible, at the local level, by walking, cycling and public transport; k) To promote and encourage sustainable transport, and in particular to make it convenient and attractive to walk, cycle or use public transport. l) ~~To support Ennis and its aspiration to become~~ To support climate adaptation initiatives within Ennis Town and surrounding areas to deliver on the objective of Ennis becoming Ireland's first Climate Adaptive Town; ~~m)~~ To monitor the cumulative effect of grants of planning permission on available wastewater capacity where connection to a public wastewater treatment plant is included as part of a development proposal ~~To support Ennis in realising its full potential in grey, green, and blue infrastructure; and~~ n) To support Ennis in realising its full potential in grey, green, and blue infrastructure; and ~~o)~~ To promote appropriate measures from the "Biodiversity for Low and Zero Carbon Buildings; A Technical Guide for New builds" to all regeneration and urban renewal projects. ~~To support the Purple Flag accreditation, and any subsequent initiative for the promotion/development of Ennis as a quality town.~~ ~~-~~p) To support the Purple Flag accreditation, and any subsequent initiative for the promotion/development of Ennis as a quality town. q) To support increased levels of town centre living and to assess the potential of the development of a modern family town centre living pilot project during the lifetime of the Plan;

	Development Plan Objective: **Ennis**	
	CDP 4.1	It is an objective of Clare County Council: a) To support Ennis as a self-sustaining, regional economic driver and as a key location for investment choice in the County and the Southern Region, and to support its enhanced development based on its strategic location relative to Limerick and Galway Cities, Shannon International Airport and the Atlantic Economic Corridor as well as its role as a centre of employment and economic activity; b) To support the implementation of Ennis 2040 to set the long-term economic and spatial strategy for the County Town with an agreed focus on an economic future and spatial pattern to 2040 and beyond; c) To prepare and implement a local area plan for the Ennis Town and Environs area incorporating a Local Transport Plan, a Strategic Environmental Assessment and an Appropriate Assessment during the lifetime of this Development Plan; d) To actively work to strengthen cross sectoral collaboration with neighbouring towns and cities, strengthening physical, social and economic links with Limerick and Galway in particular; ~~d~~e) To seek investment and to support the delivery of holistic infrastructure that will facilitate and accommodate sustainable growth in Ennis, subject to the outcome of the planning process and environmental assessments; ~~e) To prepare a Mobility Plan for Ennis;~~ f) To develop Ennis into a centre for lifelong learning and to support the further development of higher education facilities in the ~~t~~Town; g) To support initiatives which seek to strengthen and develop niche retail and mixed-use services in Ennis town centre; h) To support and promote placemaking in Ennis which would include public realm regeneration and urban renewal initiatives which incorporate SuDs and public private partnership approaches for town centre regeneration; i) To seek the sustainable development of tourism facilities that enhance diverse tourism roles for Ennis and to seek investment in services to cater for increased visitor numbers; j) ~~To support increased levels of town centre living and to assess the potential of the development of a modern family town centre~~

	~~living pilot project during the lifetime of the Plan;~~ To integrate land use and transport planning such that new employment and residential development should be consolidated in a manner which renders it serviceable by public transport and accessible, at the local level, by walking, cycling and public transport. k) To promote and encourage sustainable transport, and in particular to make it convenient and attractive to walk, cycle or use public transport. ~~k~~l) To support climate adaptation initiatives within Ennis Town and surrounding areas to deliver on the objective of Ennis becoming Ireland's first Climate Adaptive Town; ~~l~~m) To monitor the cumulative effect of grants of planning permission on available wastewater capacity where connection to a public wastewater treatment plant is included as part of a development proposal; n) To support Ennis in realising its full potential in grey, green, and blue infrastructure; ~~m~~o) To promote appropriate measures from the "Biodiversity for Low and Zero Carbon Buildings; A Technical Guide for New builds" to all regeneration and urban renewal projects. p) To support the Purple Flag accreditation, and any subsequent initiative for the promotion/development of Ennis as a quality town. q) To support increased levels of town centre living and to assess the potential of the development of a modern family town centre living pilot project during the lifetime of the Plan;

(Note that the requested changes also have the effect of amending Objective CDP4.1, which is intended to be a consistently-worded objective to Objective V3 (a) 1. The text of both objectives was not identical in the draft CDP, but I am prompted by this submission to ensure that they are made consistent).

Volume 3D West Clare MD:

Ennistymon Settlement Plan Map:

An Indicative Access Point arrow should be added to the map at the point at the southeast corner of the R5 lands alongside the N67 road.

Lisdoonvarna Settlement Plan map: The lands zoned SR1 shall be zoned for Agriculture.

Lissycasey Settlement Plan Map amendment:

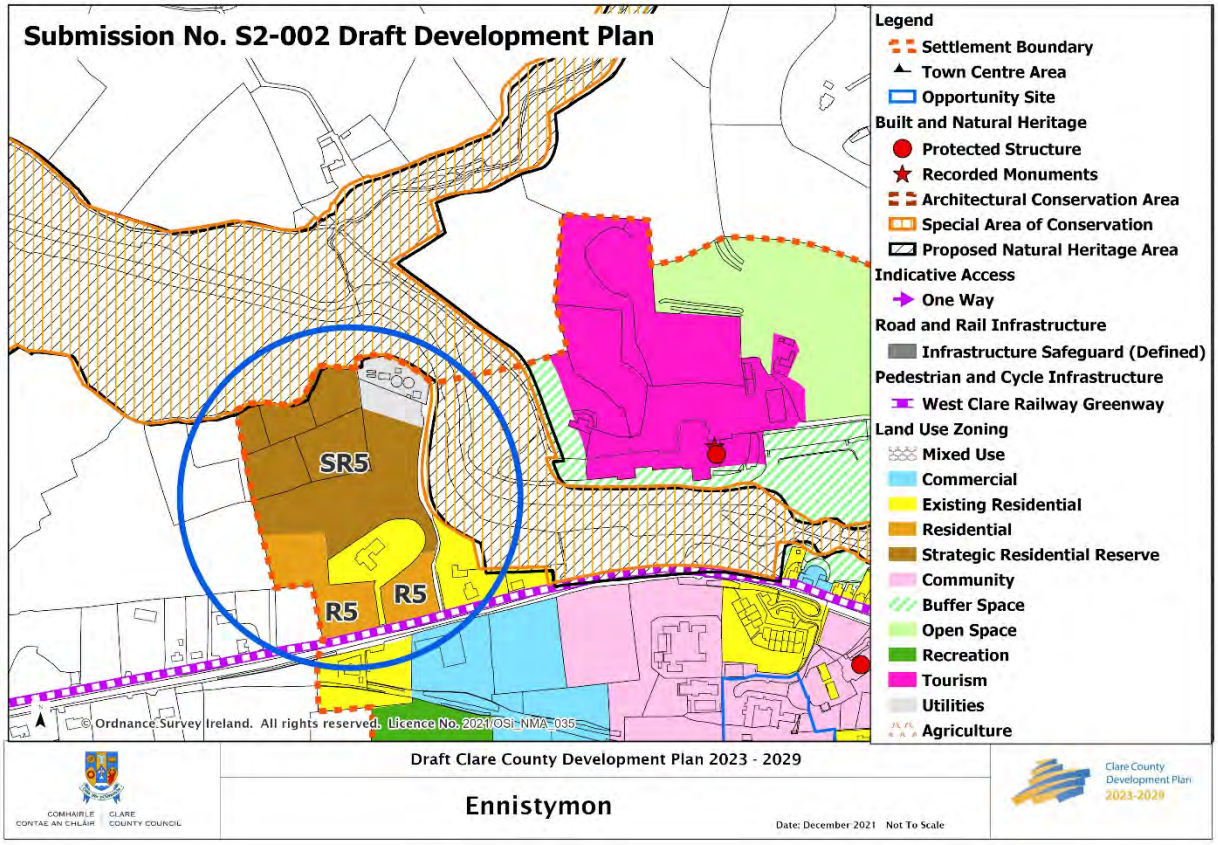
The VGA2 site at Lissycasey shall be enlarged to incorporate part of the Agriculture-zoned lands at the east, such that access to the VGA2 lands is taken from the L2148.

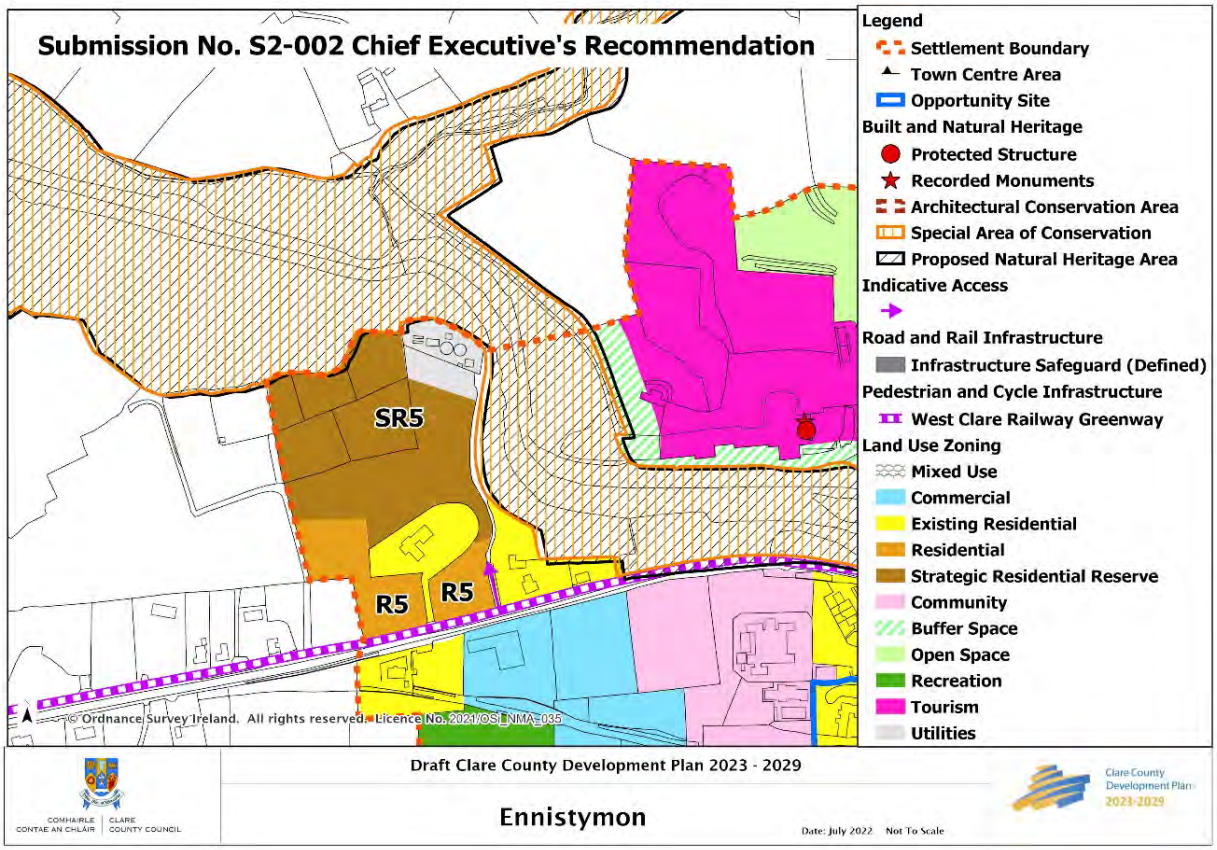
Lissycasey Settlement Plan Text amendment:

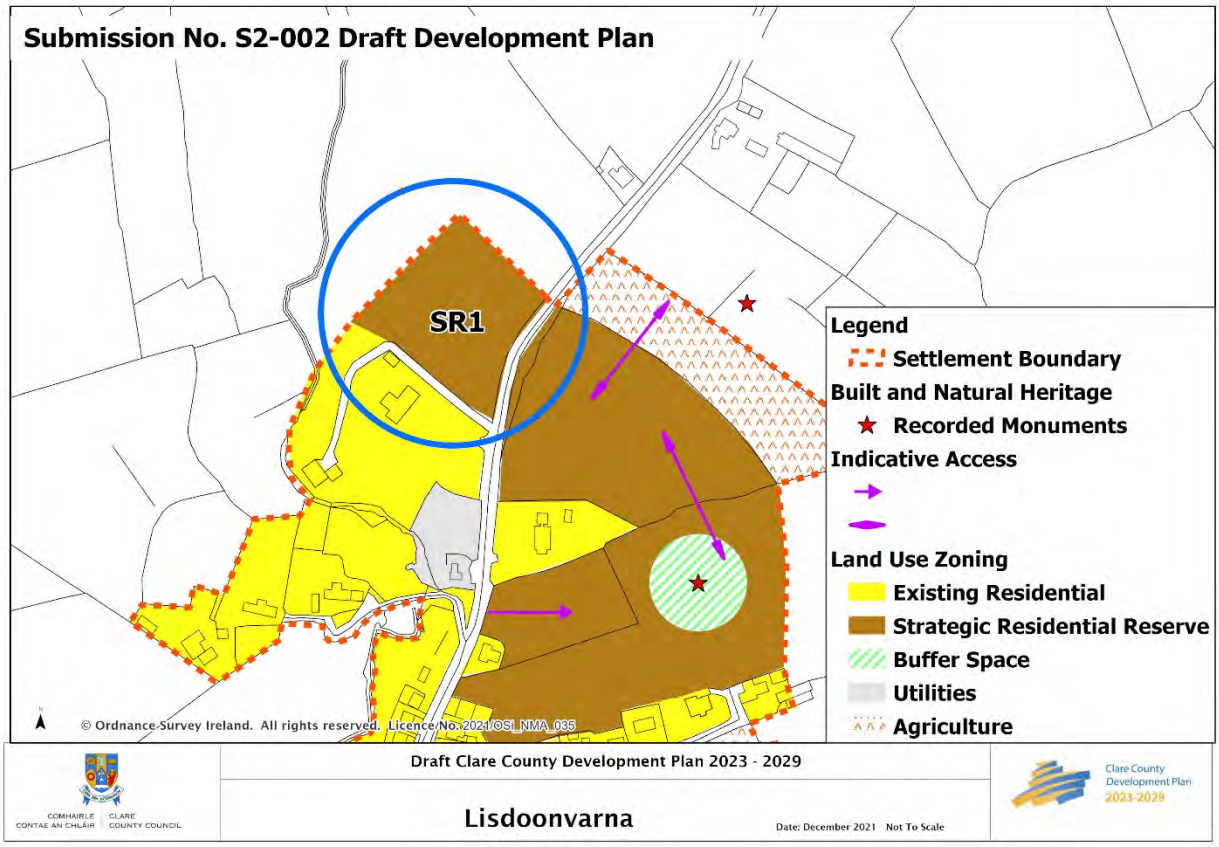
Strategy for Growth and Sustainable Communities

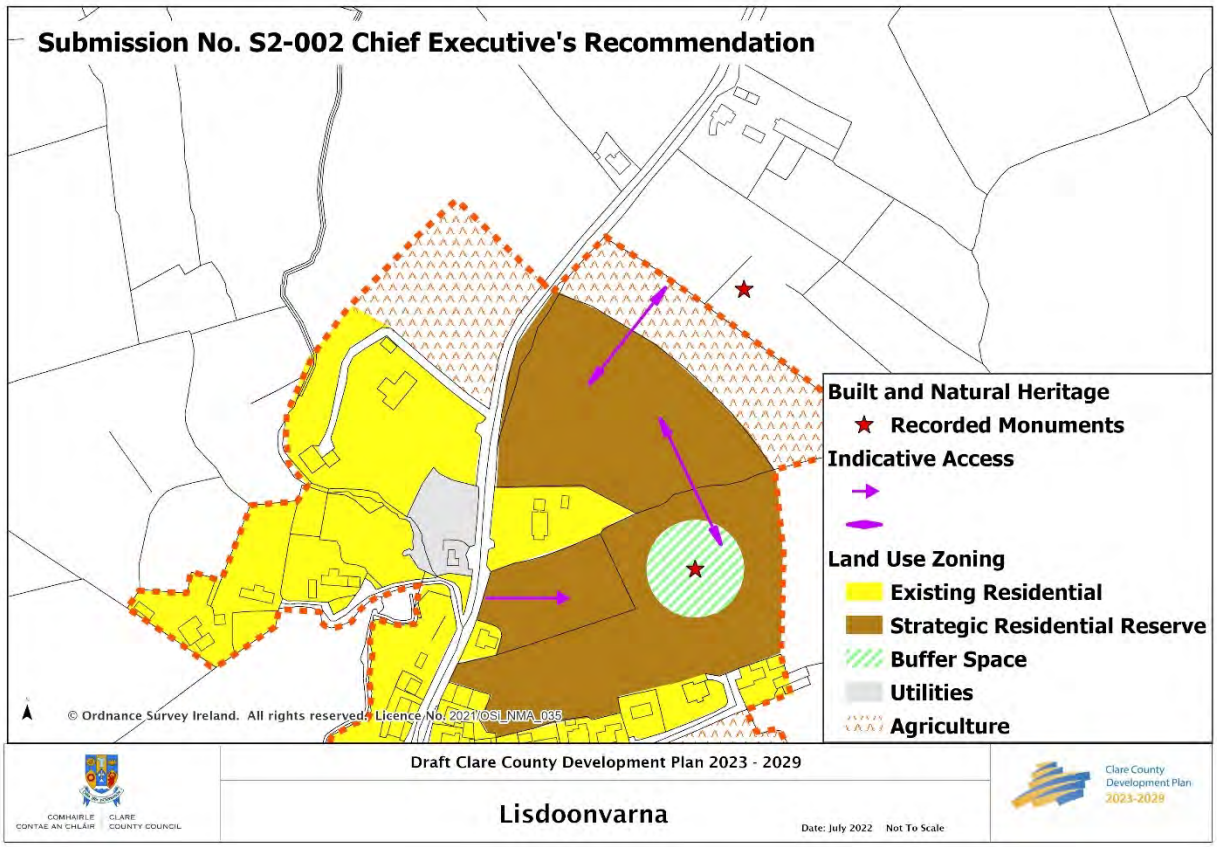
> The strategy for the sustainable growth of the village and its community is through consolidation and regeneration that promotes compact sequential growth and supports and strengthens a sustainable village community and its rural hinterland. This will be achieved by encouraging small scale growth in areas which make a positive contribution to the overall enhancement of the village and sustains it into the future. In line with this approach and to promote vibrant rural villages, village growth areas have been identified which provide opportunities and choice for development, including small scale commercial, enterprise, community, services/facilities as well as small scale cluster housing, all of which offer a viable and attractive option for rural living within a village community and setting.
>
> In particular, any development proposals on areas identified for growth shall consider the following:
>
> VGA 2:
>
> This site adjoins the N68 National Secondary Road, at a point outside the 50-60kph speed limit. No vehicular access to the VGA2 site shall be permitted from the N68, unless the relevant speed limit decreases to 50-60kph. The site also adjoins the L2148 local road. Vehicular access to the VGA2 lands shall be taken from that point, which is shown on the settlement plan map. Any development on the eastern / roadside section of the VGA2 lands shall not preclude access through to the western section of the lands. Access and movement between the two sections of the VGA2 site shall be in accordance with the access point shown on the settlement plan map.

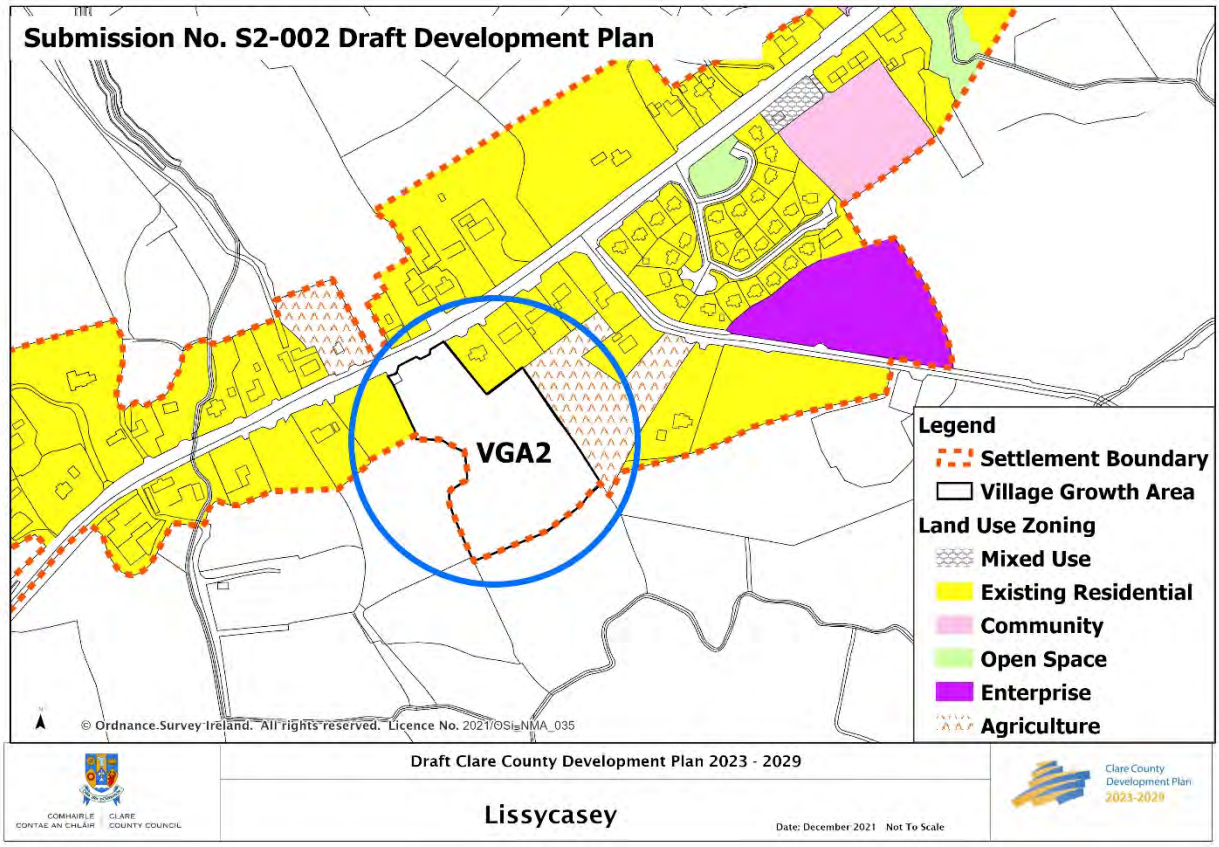
At Ballyea South cluster – I note that all of the lands in the Ballyea South cluster can be accessed from the L-10941 local road, with the exception of one field. I recommend that the cluster boundary be marginally altered to exclude a small area of land at the north from the cluster.

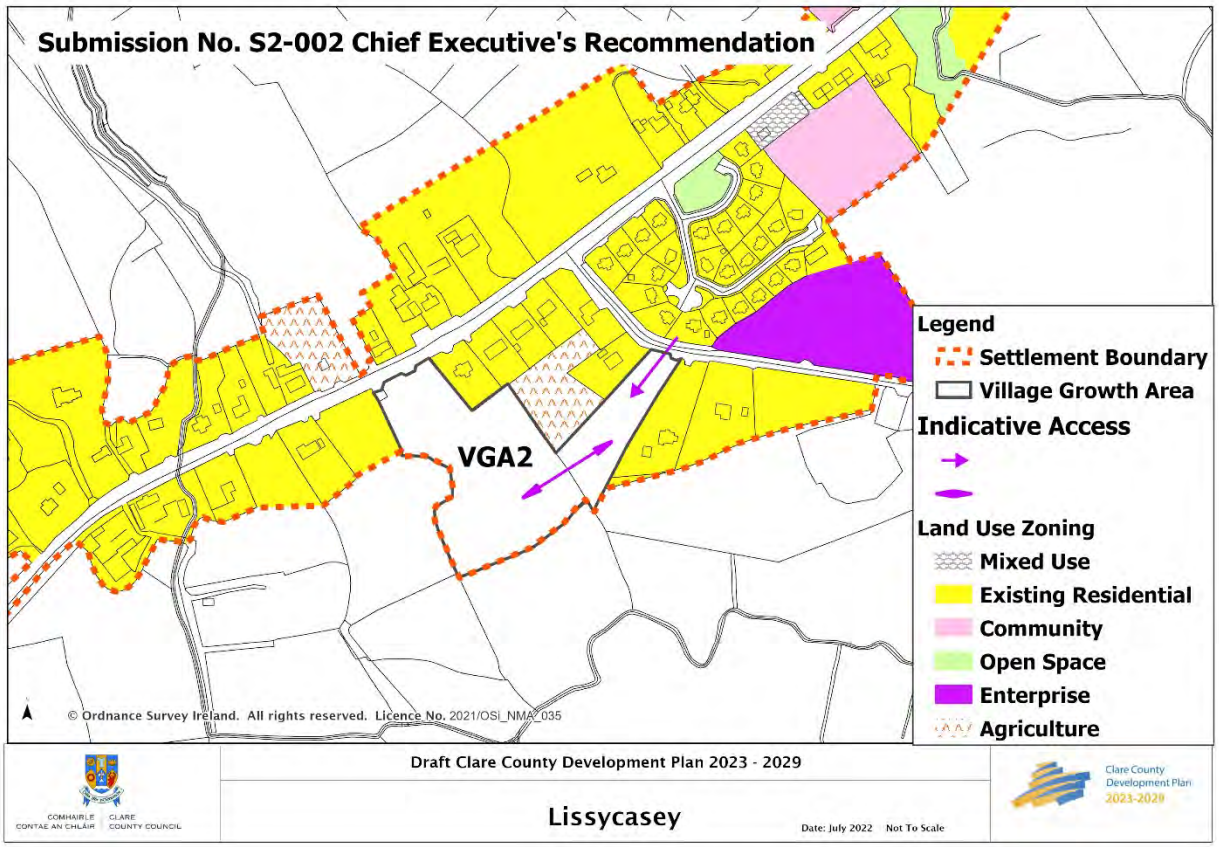

Submission No. S2-002 Draft Development Plan
SR5
R5
R5
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Legend
Settlement Boundary
Town Centre Area
Opportunity Site
Built and Natural Heritage
Protected Structure
Recorded Monuments
Architectural Conservation Area
Special Area of Conservation
Proposed Natural Heritage Area
Indicative Access
One Way
Road and Rail Infrastructure
Infrastructure Safeguard (Defined)
Pedestrian and Cycle Infrastructure
West Clare Railway Greenway
Land Use Zoning
Mixed Use
Commercial
Existing Residential
Residential
Strategic Residential Reserve
Community
Buffer Space
Open Space
Recreation
Tourism
Utilities
Agriculture
COMHAIRLE CONTAE AN CHLÁIR | CLARE COUNTY COUNCIL
Draft Clare County Development Plan 2023 - 2029
Ennistymon
Date: December 2021 Not To Scale
Clare County Development Plan 2023-2029

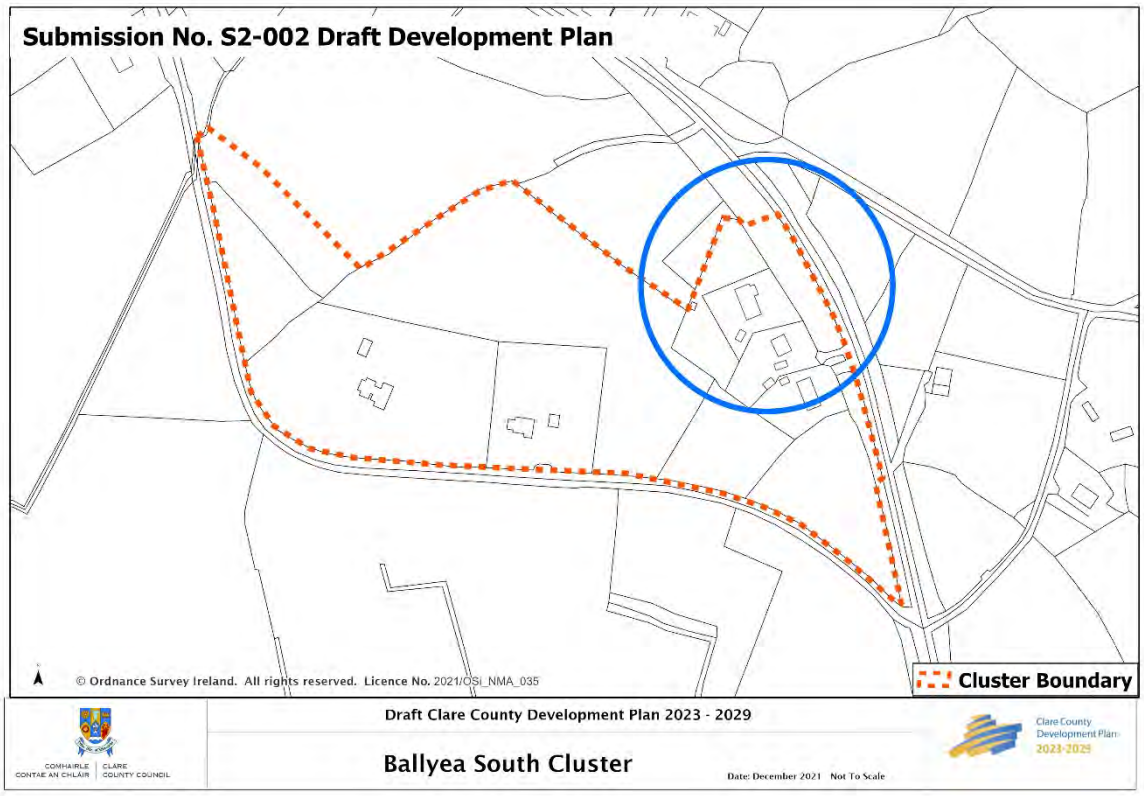

Submission No. S2-002 Chief Executive's Recommendation
SR5
R5
R5
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Legend
Settlement Boundary
Town Centre Area
Opportunity Site
Built and Natural Heritage
Protected Structure
Recorded Monuments
Architectural Conservation Area
Special Area of Conservation
Proposed Natural Heritage Area
Indicative Access
Road and Rail Infrastructure
Infrastructure Safeguard (Defined)
Pedestrian and Cycle Infrastructure
West Clare Railway Greenway
Land Use Zoning
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Residential
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Draft Clare County Development Plan 2023 - 2029
Ennistymon
Date: July 2022 Not To Scale
Clare County Development Plan 2023-2029

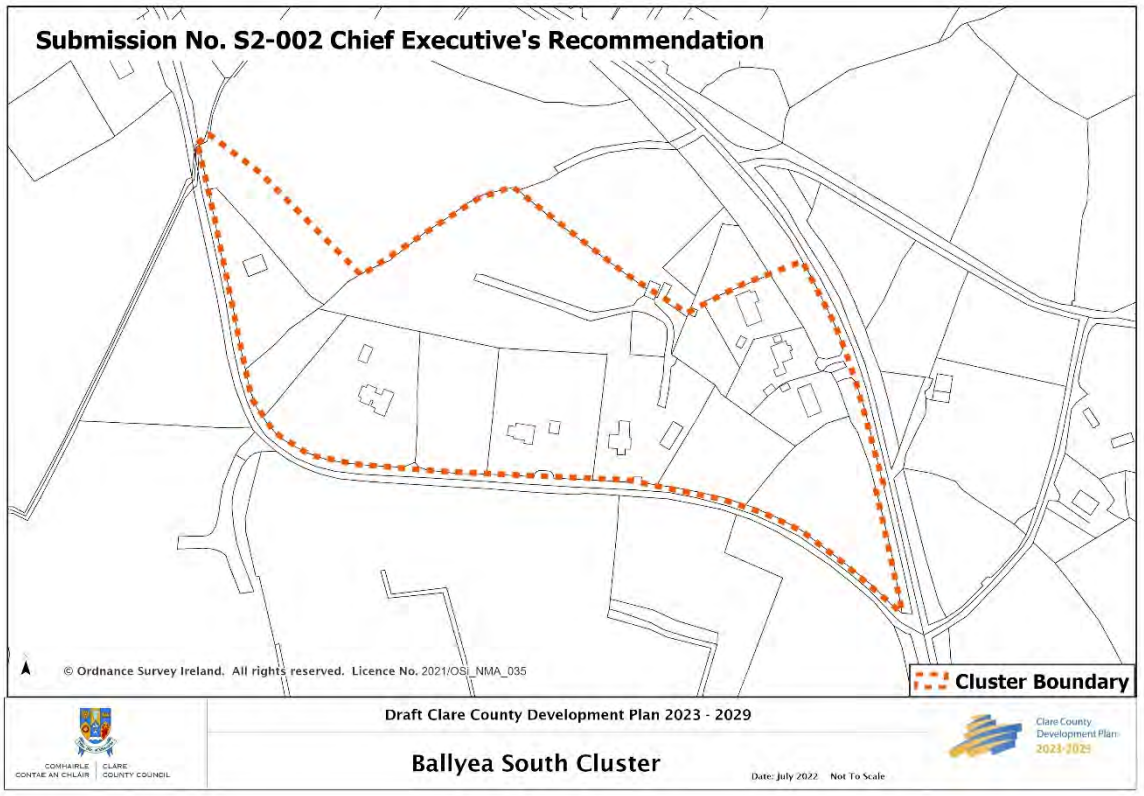

Submission No. S2-002 Draft Development Plan
SR1
Legend
Settlement Boundary
Built and Natural Heritage
Recorded Monuments
Indicative Access
Land Use Zoning
Existing Residential
Strategic Residential Reserve
Buffer Space
Utilities
Agriculture
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Draft Clare County Development Plan 2023 - 2029
Lisdoonvarna
Date: December 2021 Not To Scale
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Clare County Development Plan 2023-2029


Submission No. S2-002 Chief Executive's Recommendation
Built and Natural Heritage
Recorded Monuments
Indicative Access
Land Use Zoning
Existing Residential
Strategic Residential Reserve
Buffer Space
Utilities
Agriculture
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Draft Clare County Development Plan 2023 - 2029
Lisdoonvarna
Date: July 2022 Not To Scale
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Clare County Development Plan 2023-2029


Submission No. S2-002 Draft Development Plan
VGA2
Legend
Settlement Boundary
Village Growth Area
Land Use Zoning
Mixed Use
Existing Residential
Community
Open Space
Enterprise
Agriculture
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Draft Clare County Development Plan 2023 - 2029
Lissycasey
Date: December 2021 Not To Scale
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Clare County Development Plan 2023-2029


Submission No. S2-002 Chief Executive's Recommendation
VGA2
Legend
Settlement Boundary
Village Growth Area
Indicative Access
Land Use Zoning
Mixed Use
Existing Residential
Community
Open Space
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Agriculture
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Draft Clare County Development Plan 2023 - 2029
Lissycasey
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Clare County Development Plan 2023-2029


Submission No. S2-002 Draft Development Plan
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Cluster Boundary
Draft Clare County Development Plan 2023 - 2029
Ballyea South Cluster
Date: December 2021 Not To Scale
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Clare County Development Plan 2023-2029


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Cluster Boundary
Draft Clare County Development Plan 2023 - 2029
Ballyea South Cluster
Date: July 2022 Not To Scale
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Clare County Development Plan 2023-2029

Submission No: S2 –003 –Tourism Department - Clare County Council	
Relevant Chapters / Topics	• **Tourism** • **Recreational Route** • **Loop Head**

Summary of Issues Raised in Submission

This submission relates to a proposal for a walking trail for the Loophead Peninsula.

Requests that the submitted designed walking trail be included as a recreational route for the headland and shared surface roadway at Loop Head Lighthouse.

It is a measure of mitigating the effects of the current braid of informal trails on the headland with the intention of rehabilitating these to their original vegetation type with additional vegetation planted to ensure enhanced biodiversity at the site.

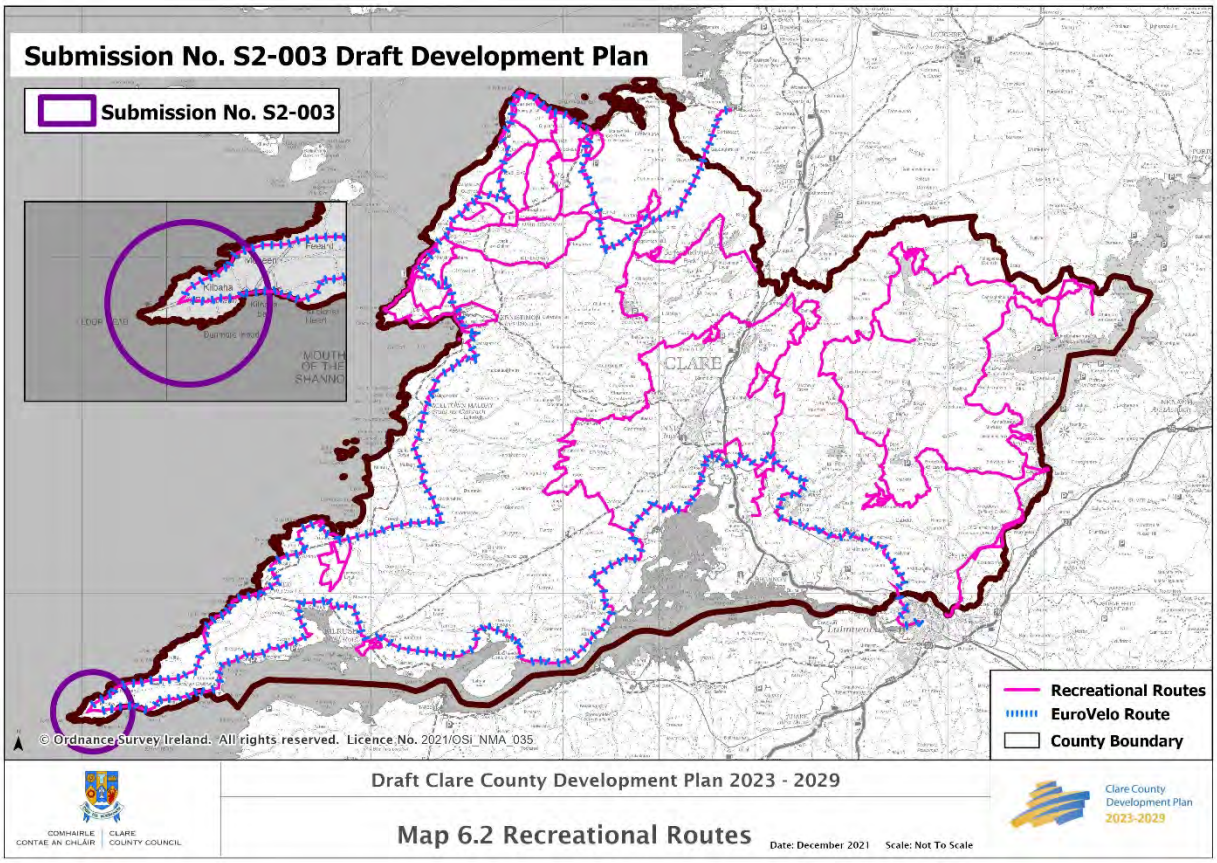
Chief Executive's Response

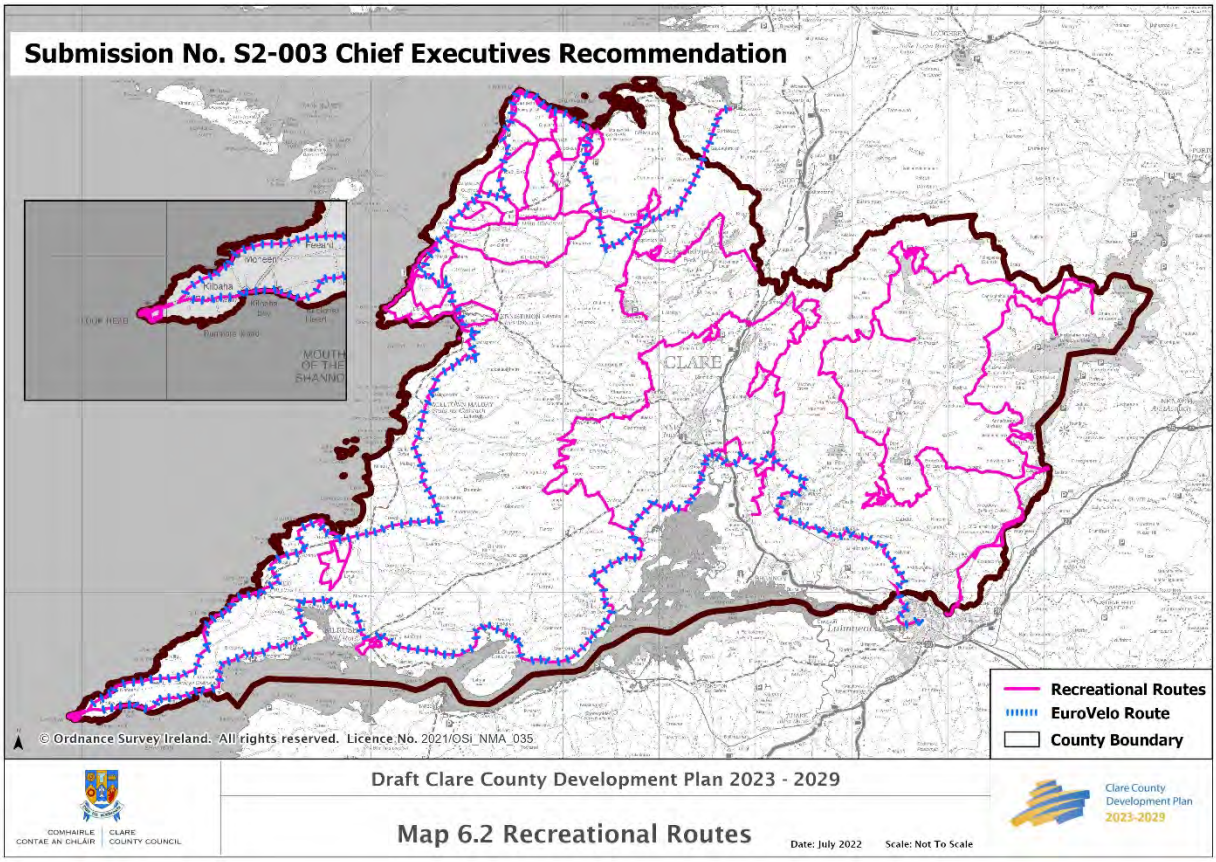
I thank the Tourism Department for their submission which provides details of the walking trail for the Loop Headland and Lighthouse and request its inclusion as a Recreational Route. There are a wealth of both urban and rural recreational routes around the County which provide an invaluable amenity resource for both local communities and visitors to the county. This is a valuable addition to the network of walking trails and agree that it should be included in the County Development Plan 2023-2029.

Chief Executive's Recommendation

I recommend the following amendments be made to the Draft Clare County Development Plan 2023-2029 in Volume 1: Written Statement:

1. Include the Loop Headland and Lighthouse walking Trail in the list of recreation routes in Appendix 6.
2. Include the Loop Headland and Lighthouse walking trail on Map 6.2 Recreational Routes in Appendix 6.
3. Amend title of Appendix 6 to read 'Appendix 6 Public Rights of Way and Recreational Routes'.
4. Insert sub-headings in Appendix 6 which relate to the respective sections 'Public Rights of Way' and 'Recreational Routes'.


Submission No. S2-003 Draft Development Plan
Submission No. S2-003
CLARE
MOUTH OF THE SHANNO
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Recreational Routes
EuroVelo Route
County Boundary
COMHAIRLE CONTAE AN CHLÁIR | CLARE COUNTY COUNCIL
Draft Clare County Development Plan 2023 - 2029
Map 6.2 Recreational Routes
Date: December 2021
Scale: Not To Scale
Clare County Development Plan 2023-2029


Submission No. S2-003 Chief Executives Recommendation
CLARE
MOUTH OF THE SHANNO
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Recreational Routes
EuroVelo Route
County Boundary
COMHAIRLE CONTAE AN CHLÁIR | CLARE COUNTY COUNCIL
Draft Clare County Development Plan 2023 - 2029
Map 6.2 Recreational Routes
Date: July 2022
Scale: Not To Scale
Clare County Development Plan 2023-2029

Submission No: S2/004 –Waterways Ireland	
Relevant Chapters / Topics	• **Killaloe** • **Tourism**

Summary of Issues Raised in Submission

The submission welcomes the wording in respect of tourism objectives in East Clare and the commitment to:

- Support the development of footpath/walking route around Lough Derg, linking Killaloe to Tuamgraney and Mountshannon.
- Promote the implementation of Tourism Masterplan for the Shannon 2020-2030.

Waterways Ireland are in the process of developing the Shannon Greenway connecting Limerick City to Scarriff/Tuamgraney and requests to include a specific reference to the proposed Shannon Greenway within the Plan.

Chief Executive's Response

I thank Waterways Ireland for the submission. I note the progress in the development of the Shannon Greenway which will add significantly to the network of walk trails and recreational routes around the county. This is recognised within the Draft Plan where specific reference is made to the Shannon Greenway within the settlement statement for Scarriff/Tumagraney in Volume 3c of the draft Plan under the headings of 'Tourism in Scarriff/Tuamgraney' and also 'Employment and Enterprise'. Reference is also made to the Shannon Greenway within the Ogonelloe settlement statement. This, coupled with strong policy support for the development of Greenways in Volume 1: Written Statement of the Draft Plan, is considered to adequately address the Shannon Greenway and that there is no requirement to expand further.

Chief Executive's Recommendation

I recommend that there is no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/005 –Limerick City and County Council (LCCC)	
Relevant Chapters / Topics	• **Economic Development** • **South Clare/University of Limerick Economic Strategic Development Zone (SDZ)**

Summary of Issues Raised in Submission

Limerick City and County Council welcomes the Draft Plan and the opportunity to make a submission. LCCC highlights the following in their submission:

Limerick - Shannon Metropolitan Area population figures

It is requested that projected population growth targets for the Limerick-Shannon Metropolitan Area, set out in Table 3.3 under Chapter 3 Core Strategy, are updated to ensure consistency with the RSES.

Proposed South Clare / University of Limerick Economic SDZ

It is acknowledged that the University of Limerick (UL) is a key strategic asset in the Mid-West Region and recognises the opportunity for the expansion of university related economic activity at this location, which cannot be accommodated in the City Centre.

However, concerns are identified in relation the scale of the proposed SDZ and potential impact on the Limerick City Centre, as follows:

- Considers proposals for non-university related development are considered unnecessary in the life of the Development Plan.
- Emphasis in national, regional and local strategy and plans on compact growth, sustainable transport and climate mitigation.
- Priority for LCCC is the sequential approach to development, with the primacy of the City Centre prioritised in the Mid-West Region.
- Development of the SDZ in the absence of integration of land use and transport planning, in particular the Northern Distributor Road, would result in increased patterns of private vehicle-based commuting and congestion.
- Potential accessibility and connectivity of the SDZ with the City Centre is unclear.
- No additional school services or other amenities proposed to cater for this population increase which will have adverse impacts on existing facilities.

The submission concludes that proposals for the SDZ must be in a phased and integrated manner, which supports the primacy and development of the City Centre in the first instance and associated objectives for compact growth, consolidation, revitalisation, sustainable transport and climate mitigation.

Chief Executive's Response

I acknowledge the submission from Limerick City and County Council the content of which is noted.

Chief Executive's Recommendation
I recommend no amendment to the Draft Clare County Development Plan on the basis of this submission.

Submission No: S2 - 007 –Office of Public Works (OPW)	
Relevant Chapters / Topics	• **Strategic Flood Risk Assessment** • **Zoning**

Summary of Issues Raised in Submission

The submission relates to flood risk and the application of the Planning System and Flood Risk Management (EDCLG/OPW) 2009 [hereafter referred to as 'Guidelines].

The OPW welcomes acknowledgement of the Guidelines and the preparation of the SFRA as well as Objectives CDP2.6 Flood Risk Assessment and Management, CDP2.7 Coastal Erosion and Flooding and CDP2.8 Floods Directive and FRAMs.

The OPW suggest the following:

Flood Zone Mapping and the Sequential Approach

The OPW refer to the flood zone mapping and clips for specific areas included in the Flood Risk Assessments in the SFRA and considers it would be beneficial if settlement level flood zone mapping were provided, overlaid on the Land Use Zoning mapping.

They note difficulty in assessing 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.

The OPW notes that for some proposed land use zonings, including some highly vulnerable uses described as being in Flood Zones A and B, no commentary has been included to indicate that the Plan Making Justification Test has been applied and passed.

The OPW notes that in several cases mitigation measures outlined in the Justification Tests have not been incorporated into the relevant settlement plans and they provide examples of same (see **Specific Settlements** below).

In the case of sites that are already developed, the OPW draws attention to Circular PL 2/2014 which provides advice and detail in relation to older developed areas of towns and cities located in Flood Zone A and B. In particular "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".

The OPW suggests that for sites that are zoned following a Justification Test where a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. This objective could require a sequential approach to ensure no encroachment or loss of floodplain, permitting only water compatible uses on the flood risk portion with planning permission subject to compliance with same following detailed FRA.

National Indicative Fluvial Mapping (NIFM)

The OPW notes that Table 4-1 incorrectly states that NIFM are predictive when in fact they are indicative and advises that cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed.

National Coastal Flood Hazard Mapping

The OPW note that datasets listed in Table 4-1 relating to coastal flooding do not include the National Coastal Flood Hazard Mapping and provides details of where this dataset can be sourced.

The Flood Risk Management Plans and Flood Relief Schemes

The OPW welcomes acknowledgement of the Guidelines and the preparation of the SFRA as well as Objectives CDP2.10 Flood Relief Schemes and requests that the 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 requests that the Council have full regard to the protection, and the need for maintenance, as appropriate, of flood relief schemes in the County including consideration of inclusion of 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

The OPW notes that no commentary has been provided on Arterial Drainage Schemes or Drainage Districts and provides details of where locations of same can be viewed.

The OPW advises that the preservation of access requirements to same should be considered in the zoning land for development.

The OPW further advises that land identified as benefiting land may be prone to flooding and site-specific flood risk assessments may be required in applications for development in these areas.

Construction, Replacement or Alteration of Bridge and Culvert over Watercourses

The OPW refers to CDP 11.11 Motorways, National Roads and Strategic Inter-Urban Roads and notes that new and upgrade roads will require watercourses and floodplain crossings.

The OPW advises on restrictions and appropriate consents required for the construction, replacement or alteration of bridges and culverts over any watercourse.

The OPW further advises that highly vulnerable/less vulnerable development, including essential infrastructure and local transport infrastructure, is not appropriate in Flood Zones A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Coastal Change

The OPW refers to the Government's newly established Inter-Departmental Group on Coastal Change Management and advises on their role in bringing forward options and recommendations for same for the Government to consider as soon as possible.

Mitigation Measures

The OPW welcomes the Flood Mitigation Measures at Site Design outlined in Section 5.8 of the Strategic Flood Risk Assessment.

SuDS and Natural Water Retention Measures

The OPW welcomes acknowledgement of the Guidelines and the preparation of the Strategic Flood Risk Assessment (SFRA) as well as Objectives CDP2.6 Flood Risk Assessment and Management, CDP2.11 Storm Water Management, CDP2.12 Flood Management, Green Infrastructure and CDP8.10 Forestry.

The OPW advise that 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 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

The OPW refers to incorrect wording contained in Objective V3(a)15 in the Ennis Municipal District Settlement Plan which supports the facilitation of the CFRAMs for Ennis & Environs "once complete" as well as in Section 8 of the SFRA Review and Monitoring where it is noted that the CFRAM Studies run on a six yearly cycle.

In this regard, the OPW advises that CFRAM Programme has been completed and implementation of the outputs from this work is underway. The OPW further advises that the EU Floods Directive requires a review the PFRA, the FRMPs and the flood maps on a six-yearly cycle and the NIFM Programme has been completed as part of these reviews. Further reviews can occur due to review requests via the Map Review Programme.

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 OPW advises that the link to historic flood events included in the SFRA is incorrect and provides the updated link.

Specific Settlements

As indicated under **Justification Tests** above, the OPW notes that in several cases mitigation measures outlined in the Justification Tests in the SFRA have not been incorporated into the relevant settlement plans, for example:

Clarecastle

The OPW refers to Site R37 and notes the following:

- Included in the Justification Test though not indicated on the land use zoning map.
- Clarification required as to whether this is Residential R3.
- The area is not included in the clipped flood map,

- The Justification Test states 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.

The OPW advises that Part three of the Justification Test refers to a flood risk assessment in section 8.3.8. which 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.

Ennis

- The OPW advises to incorporate mitigation measures for **OP3, OP 8, OP9, OP10, OP11, OP12, OP13, OP15 and OP16** outlined in the Justification Tests into the Ennis settlement statement.
- The OPW advises that mitigation measures identified for **OP6, OP7 and OP12** would not be appropriate as these lands as wholly in Flood Zone A.
- The OPW advises that **MU6** does not satisfy the requirement of Part 2 of the justification test 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 OPW states that Sites **LDR2 and R17** have failed the Justification Test but have retained their zoning and advises that 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.
- The OPW advises that no commentary has been included in the SFRA to indicate that a Plan Making Justification Test has been carried out in relation to **OP18** Commercial Use zoning which is mostly in Flood Zone A, with the remainder of the site in Flood Zone B.
- Section 8.3.6 of the SFRA states that "New or redevelopment [on OP18] will be limited to that which complies with Section 5.28 of the Planning Guidelines." The OPW advises that this limitation has not been incorporated into the Settlement Statement.
- The OPW advises that 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. In this regard, no Plan Making Justification Tests have been provided for **OP6 and OP15 and TOU1** which allow highly vulnerable development, and **COM4** which allows for less vulnerable development, and are in Flood Zone A and B.

Ardnacrusha

Existing Residential Lands with unmapped watercourse - Identify the at-risk area and include SFRA mitigation measures into the zoning objective text in the settlement plan.

Ballycannon North

The SFRA states 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*".

Clarify whether this refers to *Existing Residential* zoned lands in Flood Zone A and B, and if so, incorporate into the zoning objective text in the settlement plan.

Bunratty

TOU1 lands

- The text of settlement plan states that "water compatible uses shall be permitted" and identifies specific uses that shall not be permitted. Other highly vulnerable uses such as hotel, B&B or hostel have not been included. This text might be clarified to match that used as the basis upon which this zoning was justified.

Residential zoned lands R1 within Flood Zone A

- No commentary included indicating a Justification Test has been carried. Highly vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.
- Mitigation measures outlined in the SFRA are inconsistent with flood risk commentary in the settlement plan.

Existing Residential lands

- Incorporate SFRA mitigation measures into zoning objective text in the settlement plan.

Sixmilebridge

Existing Residential lands encroaching on Flood Zones A and B

- The mitigation measures outlined in the SFRA are inconsistent with flood risk commentary in the settlement plan.

Bridgetown

Existing Residential lands within Flood Zones A and B

- Incorporate SFRA justification into zoning objective text in the settlement plan.

Broadford

Existing Residential lands within Flood Zones A and B

- Incorporate SFRA justification into zoning objective text in the settlement plan.

Caher

Tourism lands within Flood Zones A and B

- Incorporate text from Table 10-1 of SFRA into zoning objective text in the settlement plan.

Feakle

The SFRA states 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

Residential and Tourism lands within Flood Zones A and B

- No commentary included indicating a Justification Test has been carried. Highly vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.

Mountshannon

Tourism lands within Flood Zone A and B

- Incorporate SFRA mitigation measures into zoning objective text in the settlement plan.

O'Callaghan's Mills

Existing Residential lands within Flood Zones A and B

- 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

Community and Industrial within Flood Zones A and B

- No commentary has been provided to indicate that these zonings have been assessed via the Plan Making Justification Test.

Ballyvaughan

Commercial and Existing Residential within Flood Zones A and B

- No commentary has been provided to indicate that these zonings have been assessed via the Plan Making Justification Test.

Ballyea

Community within Flood Zones A and B

- The SFRA states that *Community lands* which allows highly vulnerable development have been zoned in Flood Zone A. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Ballynacally

Commercial and Existing Residential within Flood Zones A and B

- The SFRA states that less vulnerable *Commercial* and highly vulnerable *Existing Residential* lands have been zoned in Flood Zone A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Belharbour

Existing Residential and Mixed Use within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* and *Mixed Use* lands which allows highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Carrigaholt

Existing Residential and Mixed Use within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* and *Mixed Use* lands which allows highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.
- Incorporate SFRA mitigation measures 'that there should be no further development in *Mixed Use* zoned lands in Flood Zones A and B' into zoning objective text in the settlement plan.

Cooraclare

Existing Residential and Mixed Use within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* and *Mixed Use* lands which allows highly vulnerable development has been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Corofin

New Residential (R3), Existing Residential and Utilities within Flood Zones A and B

- The SFRA states that highly vulnerable *New Residential (R3)*, *Existing Residential* and *Utilities* lands which can allow highly vulnerable development have been zoned in Flood Zone A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Cranny

Enterprise within Flood Zones A and B

- The SFRA states that less vulnerable *Enterprise* lands have been zoned in Flood Zones A and B. Less vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Creegh

Existing Residential within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* lands have been zoned in Flood Zone A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Doolin

Tourism and Mixed Use lands within Flood Zones A and B

- The SFRA states that highly vulnerable *Tourism* and *Mixed Use* lands which allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Doonbeg

Existing Residential within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* lands have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Inagh

Commercial, Community and Mixed Use within Flood Zones A & B

- The SFRA states that less vulnerable *Commercial* and *Community* and *Mixed Use* lands have been zoned in Flood Zone A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Inch

Existing Residential within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* lands have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Kilkee

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

- Enterprise ENT3 – these lands are located on the periphery of Kilkee and do not satisfy Part 2 of the justification test which 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.

Killadysert

Existing Residential and Community within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* and *Community* lands that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Kilmaley

Existing Residential and Community within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* and *Community* lands that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Kilmihil

Existing Residential and Community within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* and *Community* lands that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Kilrush

Mixed Use lands within Flood Zones A and B

- Incorporate SFRA mitigation i.e. the requirement for the application of the sequential approach to development management, into zoning objective text in the settlement plan.

Knock

Existing Residential and Community within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* and *Community* lands that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Lisdoonvarna

Existing Residential, and Tourism and Community within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential,* and *Tourism* and *Community* lands that can allow for highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Lissycasey

Existing Residential and Commercial within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* and less vulnerable *Commercial* lands have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Moy

Residential within Flood Zones A and B

- The SFRA states that highly vulnerable *Residential* lands have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Moyasta

Existing Residential and Tourism within Flood Zones A and B

The SFRA states that highly vulnerable *Existing Residential,* and *Tourism* lands which can allow highly vulnerable usage have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Querrin

Existing Residential within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* lands have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Quilty

Existing Residential within Flood Zones A and B

- The SFRA states that highly vulnerable *Existing Residential* lands have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Ruan

Table 11-1 of the SFRA states that several areas are at risk of flooding within Ruan. 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

Tourism within Flood Zones A and B

- The SFRA states that *Tourism* lands which can allow highly vulnerable usage have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate unless a Plan Making Justification Test has been satisfied.

Chief Executive's Response

I wish to thank the OPW for their submission and acknowledge the issues raised.

Flood Zone Mapping and the Sequential Approach

I note the suggestion of the OPW that it would be beneficial if flood zone mapping was overlaid on the land-use zoning mapping for settlements and this is something that will be explored. However, the extent and breadth of information required to be contained in the Development Plan will present challenges to achieving this. The Planning Department can make the draft plan layer available to the OPW to assist in their review land use zoning, flood zones and the sequential approach.

Justification Tests

I note comments identifying the need for Justification Tests to be undertaken for specific settlements identified later in the submission and confirm that Justification Tests have been undertaken and will be included in the SFRA. Similarly, any mitigation measures outlined in the Justification Tests which have not been incorporated into the settlement statements as identified later in the submission will be amended accordingly.

National Indicative Fluvial Mapping (NIFM)

I note comments in relation to Table 4-1: Available flood risk data of the SFRA and the incorrect wording 'predictive mapping' will be corrected to 'indicative mapping'.

National Coastal Flood Hazard Mapping

The National Coastal Flood Hazard Mapping data was provided by the OPW and reviewed, and it showed that there was little difference in the flood extents, but in a number of settlements, including Kilrush, the new NCFHM was found to overestimate flood extents, when compared with the draft Flood Zone mapping. In consultation with the OPW the best approach was decided upon was to retain the CFRAM based Flood zones.

The Flood Risk Management Plans and Flood Relief Schemes

The OPW requests that the Council has full regard to the proposed development of flood relief schemes at Ennis South, Springfield, Kilkee, Shannon Town and Environs, Bunratty and Kilrush to ensure that the zoning of lands for development support and do not prevent or impede progression of these measures and seeks a CDP objective in this regard. In the preparation of the Draft Plan the SFRA informed the zoning of lands on the settlement land use maps contained in the settlement statements in Volume 3 of the Draft Plan. The schemes specifically listed in the

submission have therefore been taken into account in the zoning of lands in the respective settlements. I believe there is comprehensive policy support in the draft Plan in this regard.

In addition, the SFRA will be updated to include an additional paragraph in Section 3.2 'Flood Management Infrastructure' and inclusion of a new section 5.9 to address design around flood defences. The accompanying Table 3-2 will be reviewed and updated where a number of schemes have progressed further since the issuing of the draft Plan.

Arterial Drainage Schemes and Drainage Districts

The SFRA will be updated to include commentary on Arterial Drainage Schemes within Section 3.2 'Flood Management Infrastructure' and the new section 5.9. An additional note will also be added into section 5.4 'Development in Flood Zone C' in response to the requirement of site-specific FRA lads zoned on benefiting land.

I note that consultation with the OPW at the pre-draft stage of the plan preparation process raised the need for access to maintain Arterial Drainage Schemes. Where these schemes are located land has been zoned as 'Open Space' within the relevant settlements land-use plans to allow for access and to ensure future development does not encroach on these areas.

Settlement Statements are provided for all settlements in the county and are contained in Volume 3 of the draft Plan. The SFRA has informed the zoning of lands to ensure that those zoned for development are appropriate. Site specific objectives are provided for the majority of sites and where the SFRA has indicated a possible residual flood risk that would require the need for a site-specific FRA this is stated within the site-specific objective. In addition, where the SFRA also provides advice at a settlement level there is a specific section in the settlement statement headed 'Flooding and Flood Risk'. I consider this provides comprehensive.

Construction, Replacement or Alteration of Bridge and Culvert over Watercourses

The comments in the submission are noted and in response an additional section will be included in the SFRA as an additional section 5.8.7 Bridges, culverts and weirs. The SFRA will also review where Justification Tests might be needed for transport infrastructure and prepare same.

Coastal Change

The establishment of the Inter-Department Group on Coastal Change Management by the government is noted and reference to this will be included within section 4.4.2 'Tidal and Coastal Flooding' of the SFRA.

Mitigation Measures

The OPW comments are noted.

SuDS and Natural Water Retention Measures

The SFRA will have regard to the Guidance in relation to SuDS techniques as referenced in the submission.

CFRAM Update

The update provided in the submission regarding the CFRAM Programme is noted. Objective V3(a)15 in the Ennis Municipal District Settlement Plan will be amended to remove the wording 'once complete' from part b) of the objective. The SFRA will also update table 12-1 'SFRA Review Triggers' to align with the information in the submission in relation to the flood map review cycle.

Applications for Development in Areas at Risk of Flooding

Comments welcomed and noted.

Historic Flood Events

The change in website address for historic flood events is noted and will be included in the SFRA.

Specific Settlements

Clarecastle

Comments are noted in relation to the land use zone referencing regarding R37 and will be amended to reference R3 in the SFRA to align with the Draft Plan settlement map. Wet islands have been removed and R3 is appropriate.

Ennis

In response to the issues raised in the submission I note the following:

OP6 - a Justification Test for OP6 has been completed and passed, the SFRA will be amended to include it in section 8.2.

OP7 and OP12 - wording in table 8.3.3 will be amended to remove reference to the application of the sequential approach in relation to OP7 and OP12.

MU6 – SFRA will be updated in light of the recently completed Ennis South Flood Relief Scheme and associated Flood Maps.

LDR2, R17, OP15, OP18, TOU1, COM4 – Justification Tests have been completed and will be included in the SFRA.

Ardnacrusha

The comments noted in relation to an unmapped water course which runs through an area of Existing Residential in Ardnacrusha. This will be shown in the settlement map and a location map will be included in the SFRA, Table 9-1 and the wording from the SFRA will be included in the Settlement Statement for Ardnacrusha under the heading Flooding and Flood Risk.

Bunratty

The submission notes that the wording in the SFRA Justification Test in relation to TOU1 should also be used in the zoning objective for the site. The wording will be amended from 'water compatible uses shall be permitted" to "uses should be water compatible".

Residential zoned lands R1 are noted to include a small area of Flood Zone A. Given that residential is a highly vulnerable use the portion within Flood Zone A will be rezoned and included by an extension of the adjacent Buffer zoning.

Existing Residential zoned land have been subject of a Justification Test which will be included in the SFRA.

Sixmilebridge

Wording of the SFRA in relation to Existing Residential Zoned Lands which reads "….. any redevelopment in these areas should be in accordance with Section 5.28 of the Planning Guidelines" should replace wording in the draft Settlement Statement for Sixmilebridge under the

section on 'Flooding and Flood Risk' which reads" …. if redevelopment of plots takes place, finished floor levels should be used as the primary means of addressing flood management".

Bridgetown

Section to be added in the Settlement Statement for Bridgetown to include and additional heading 'Flooding and Flood Risk in Bridgetown' – Development within lands zoned Existing Residential within Flood Zones A and B should be according to Section 5.28 of the Planning guidelines".

Broadford

Include a section at the end of the Settlement Statement 'Flood Risk and Flooding' and include text which reads "Development on Flood Zones A and B within Existing Residential Zoned lands should be according to section 5.28f the Planning Guidelines".

Caher

It is noted that there is an overlap between Tourism zoned lands and Flood Zones and wording to be included into settlement Statement for Caher to read " It is important that permitted uses within the tourism zoning are limited to water compatible".

Feakle

Noted that reference is made to industrial zoning when none is shown on the zoning map. Reference will be removed from the SFRA.

Killaloe

TOU3 – Justification Test completed and to be included in the SFRA

TOU6 – SFRA will be updated to note that although tourism can permit highly vulnerable development, there are specific restrictions in the development plan which limit this to water compatible development based on the lake.

Residential zonings – Justification Test completed and to be included in the SFRA.

Scarriff/Tuamgraney

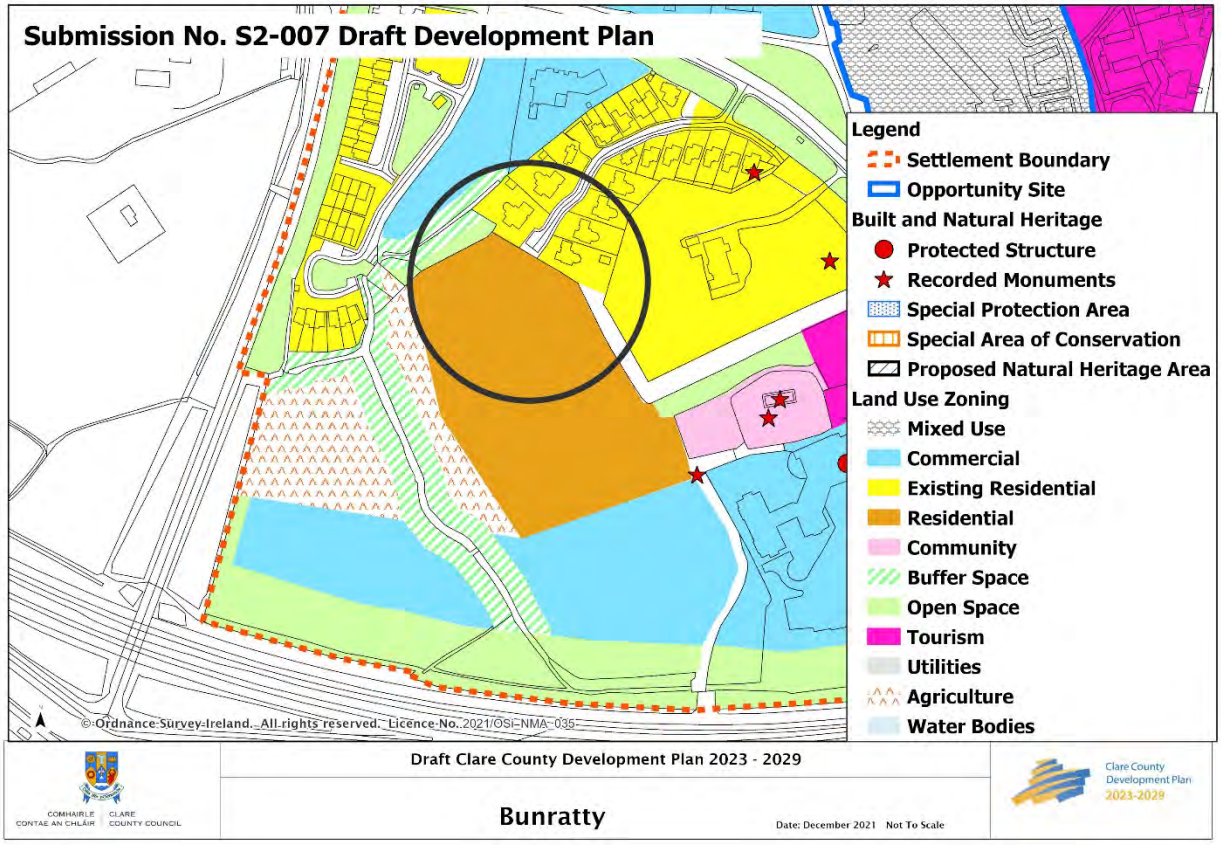
Table 10-1 in the SFRA will be updated to make clear that only water compatible elements are permitted in Flood Zones A and B.

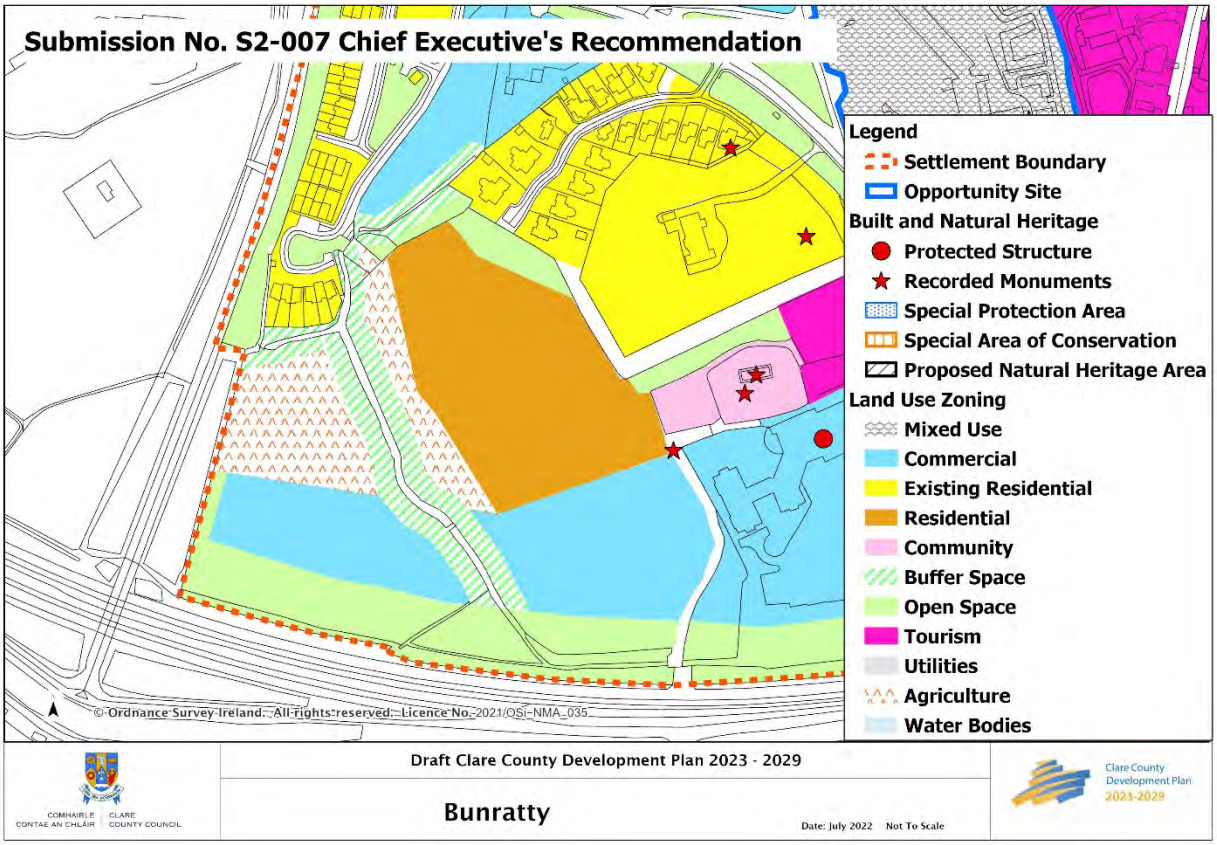
The submission notes that for a number of settlements where there is zoning which would allow for highly vulnerable uses, there is no commentary to indicate that Justification Tests have been completed in Table 11-1 of the SFRA and a Justification Test must be completed and passed to justify the zonings. In response I note that Justification Tests have been completed and passed for ***Ballyvaughan, Ballyea, Ballynaclly, Bellharbour, Carriagaholt, Cooraclare, Corofin, Cranny, Creegh, Doolin, Doonbeg, O'Callaghan's Mills, Killadysert, Knock, Lisdoonvarna, Lissycasey, Moy, Moyasta, Querrin, Quilty, Spanish Point.*** The SFRA will be updated accordingly.

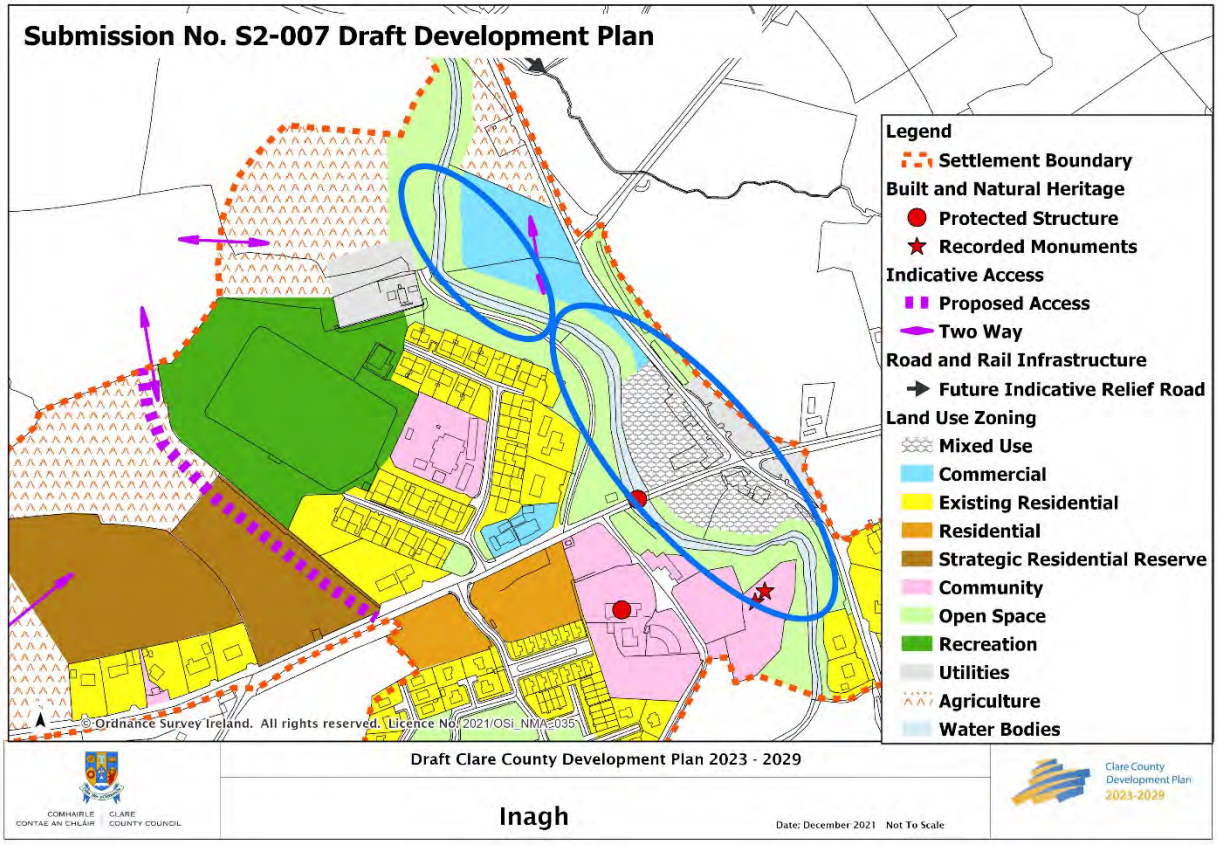
Settlement maps to be amended to align zonings with Flood Zones A and B for the settlements of Bunratty, Inagh, Inch, Kilkee, Killadysart and KIlmaley as included in my recommendation below.

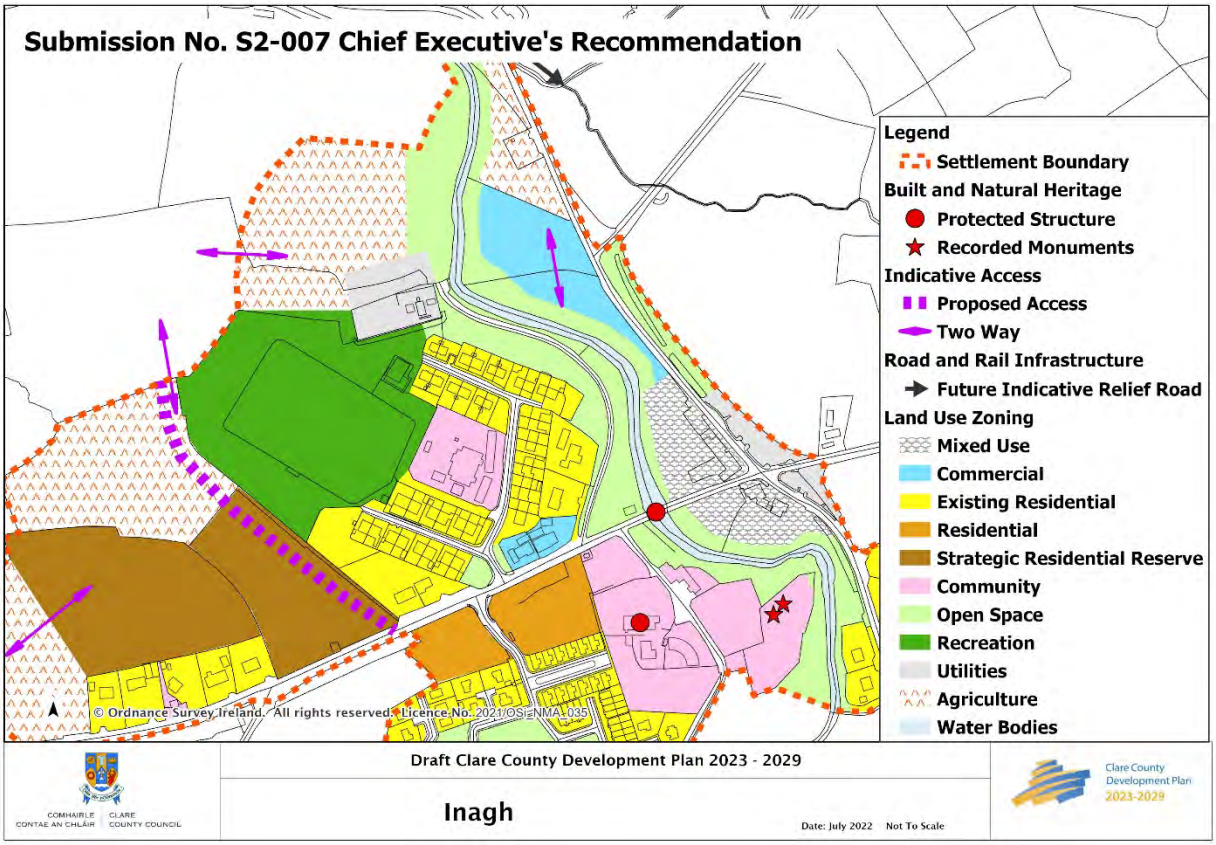
Moyasta - SFRA updated to note that although tourism can permit highly vulnerable development, there are specific restrictions in the development plan which limit this to water compatible development associated with the railway.

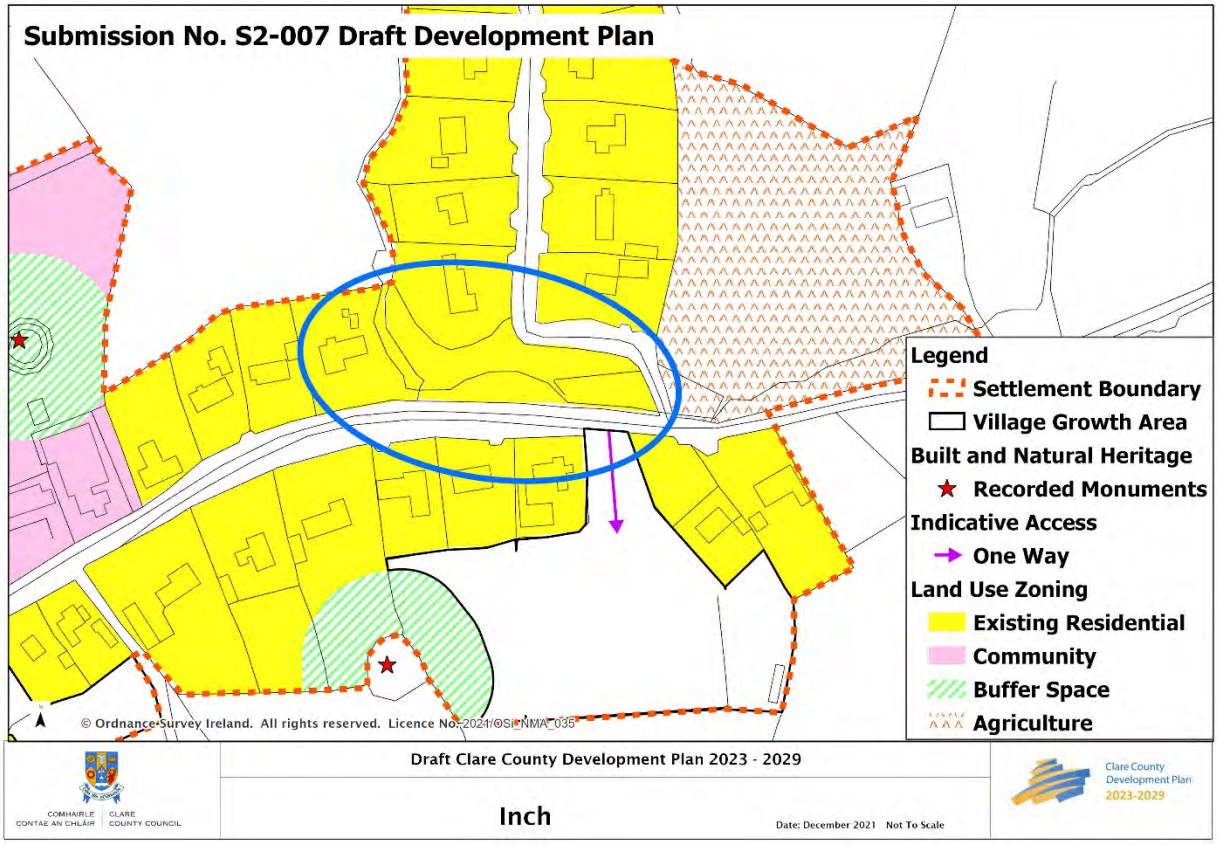
Chief Executive's Recommendation
I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission. • To update the Draft SFRA to incorporate revisions as set out in my response. • To amend the Settlement Maps for the following settlements: ***Bunratty*** – Residential zoned land within Flood Zones A and B changed to Open Space. **Inagh –** Commercial, Community and Mixed-Use zonings within Flood Zones A and B changed to Open Space Zoning ***Inch*** –Existing Residential zoning within Flood Zone A and B changed to Open space zoning. ***Kilkee*** – Enterprise zoning ENT3 - area within Flood Zone A and B changed to Open Space. ***Killadysert*** – Area of Community zoning C3 and area of Existing Residential within Flood Zone A and B and zone as Open Space. ***Kilmaley*** - amendment to settlement zoning map to change areas of lands zoned Community and Existing Residential within Flood Zone A and B to Open Space.

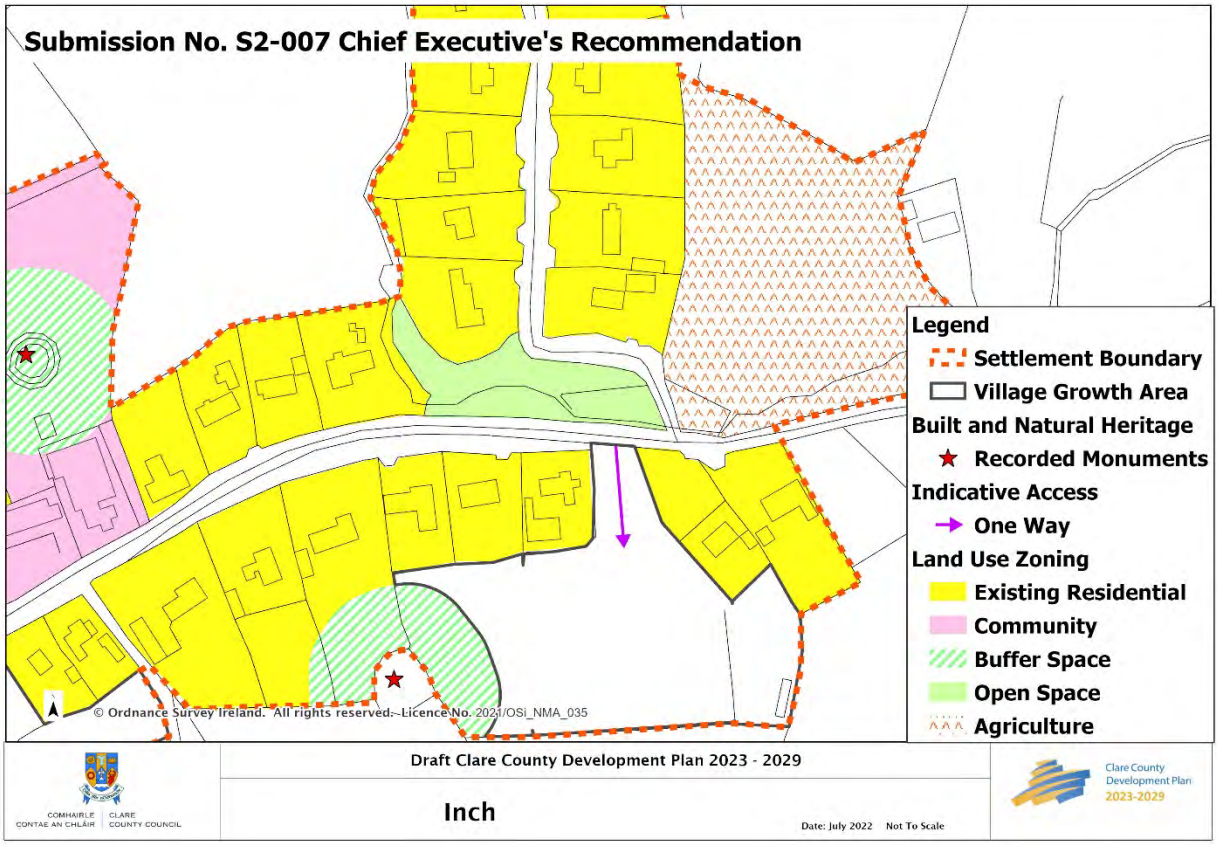

Submission No. S2-007 Draft Development Plan
Legend
Settlement Boundary
Opportunity Site
Built and Natural Heritage
Protected Structure
Recorded Monuments
Special Protection Area
Special Area of Conservation
Proposed Natural Heritage Area
Land Use Zoning
Mixed Use
Commercial
Existing Residential
Residential
Community
Buffer Space
Open Space
Tourism
Utilities
Agriculture
Water Bodies
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Draft Clare County Development Plan 2023 - 2029
Bunratty
Date: December 2021 Not To Scale
Clare County Development Plan 2023-2029

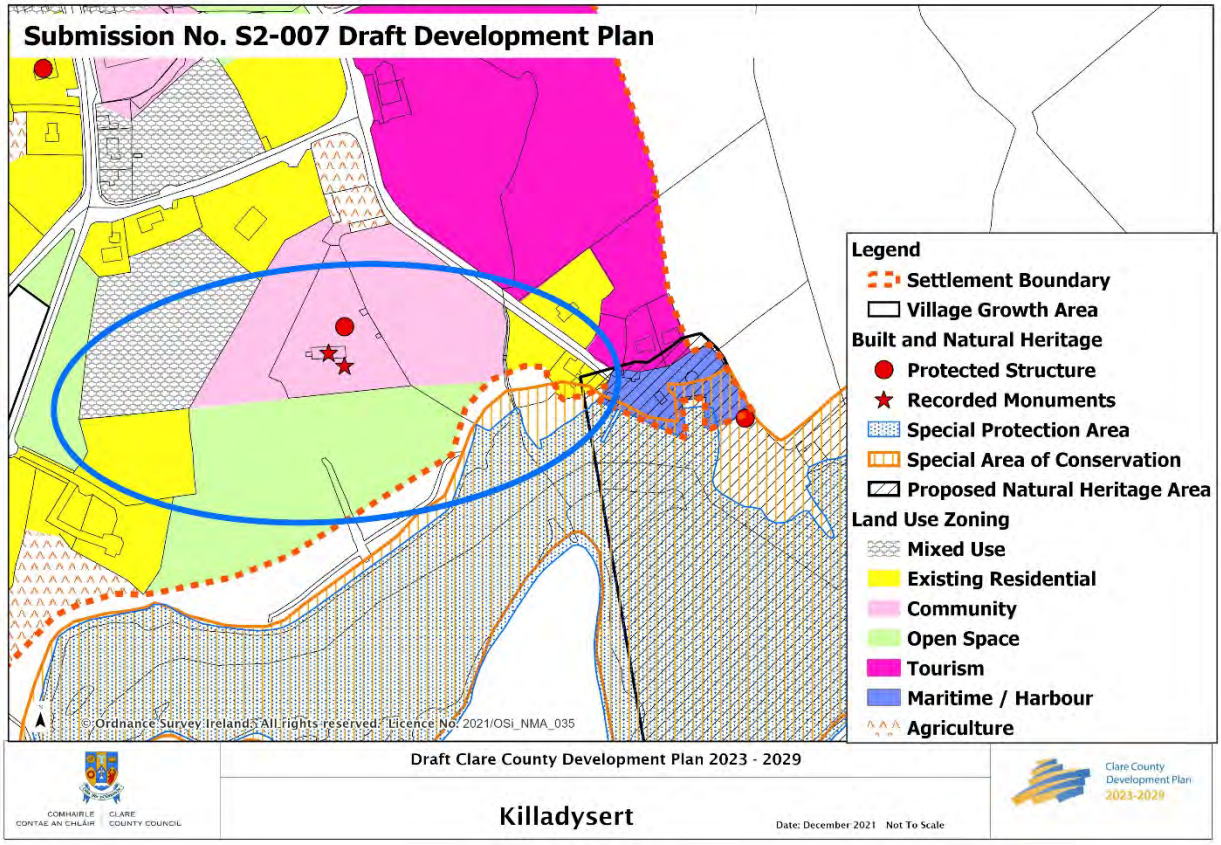

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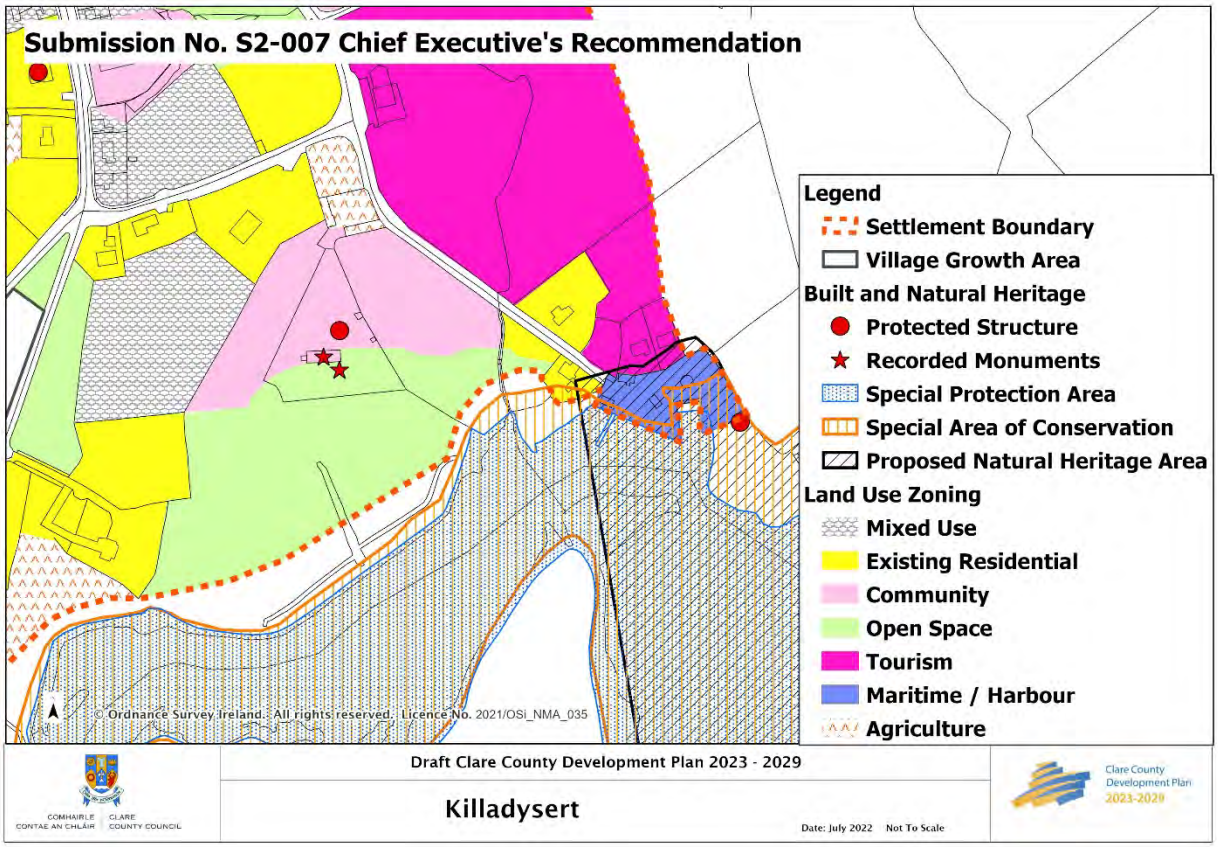

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Indicative Access
Proposed Access
Two Way
Road and Rail Infrastructure
Future Indicative Relief Road
Land Use Zoning
Mixed Use
Commercial
Existing Residential
Residential
Strategic Residential Reserve
Community
Open Space
Recreation
Utilities
Agriculture
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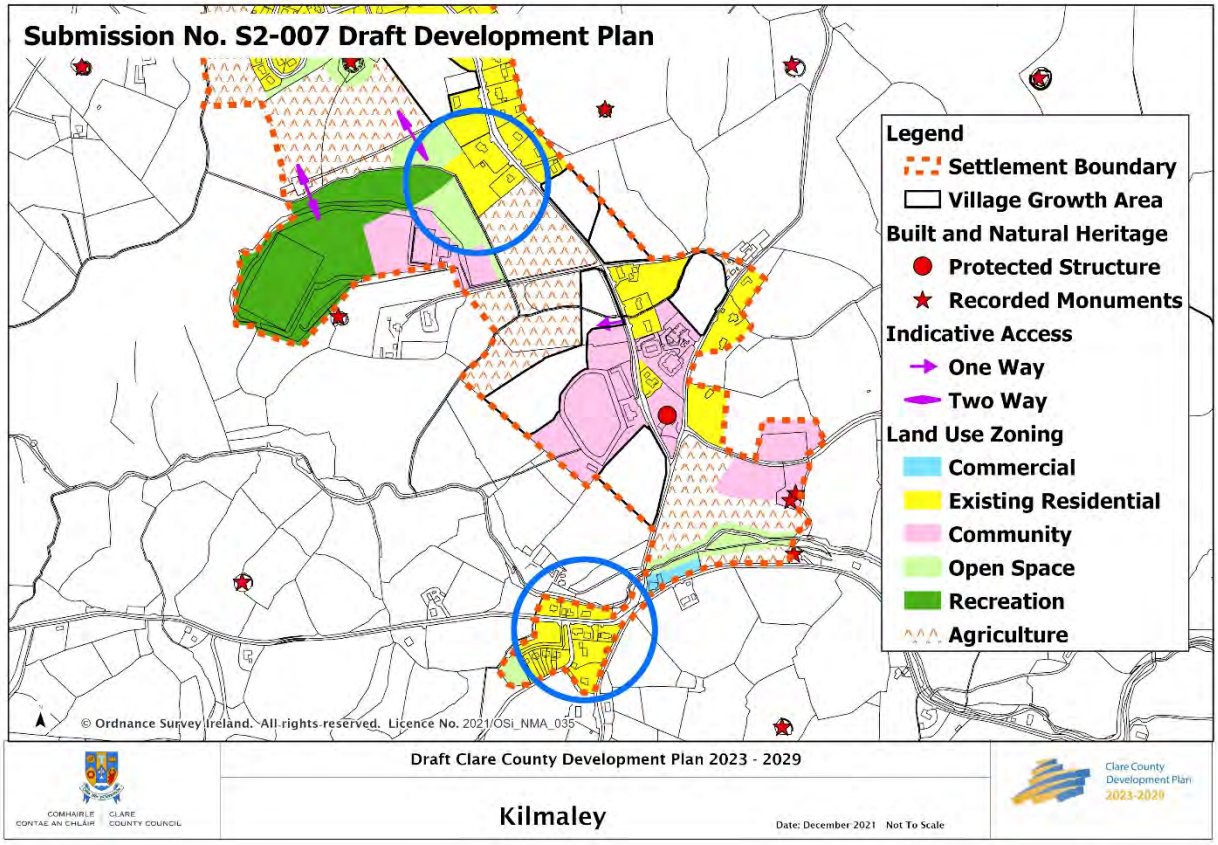

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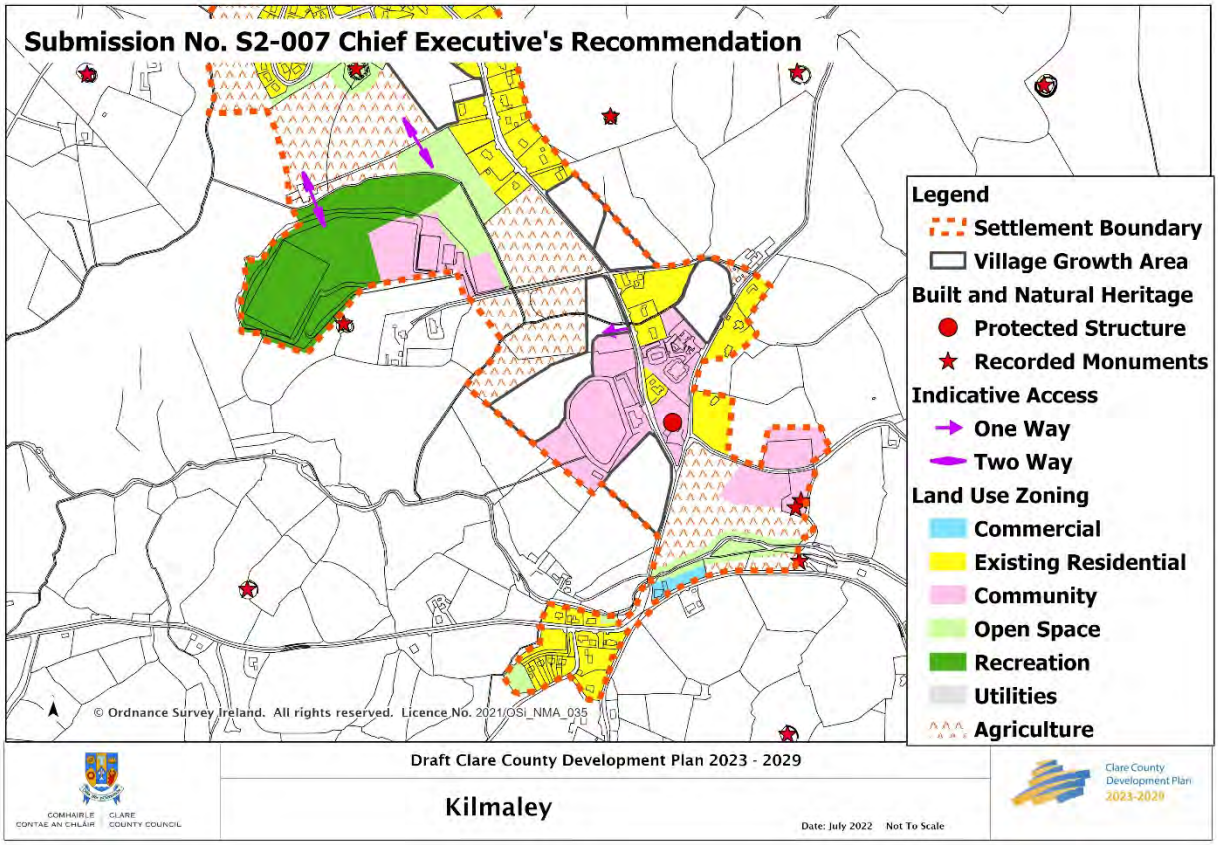

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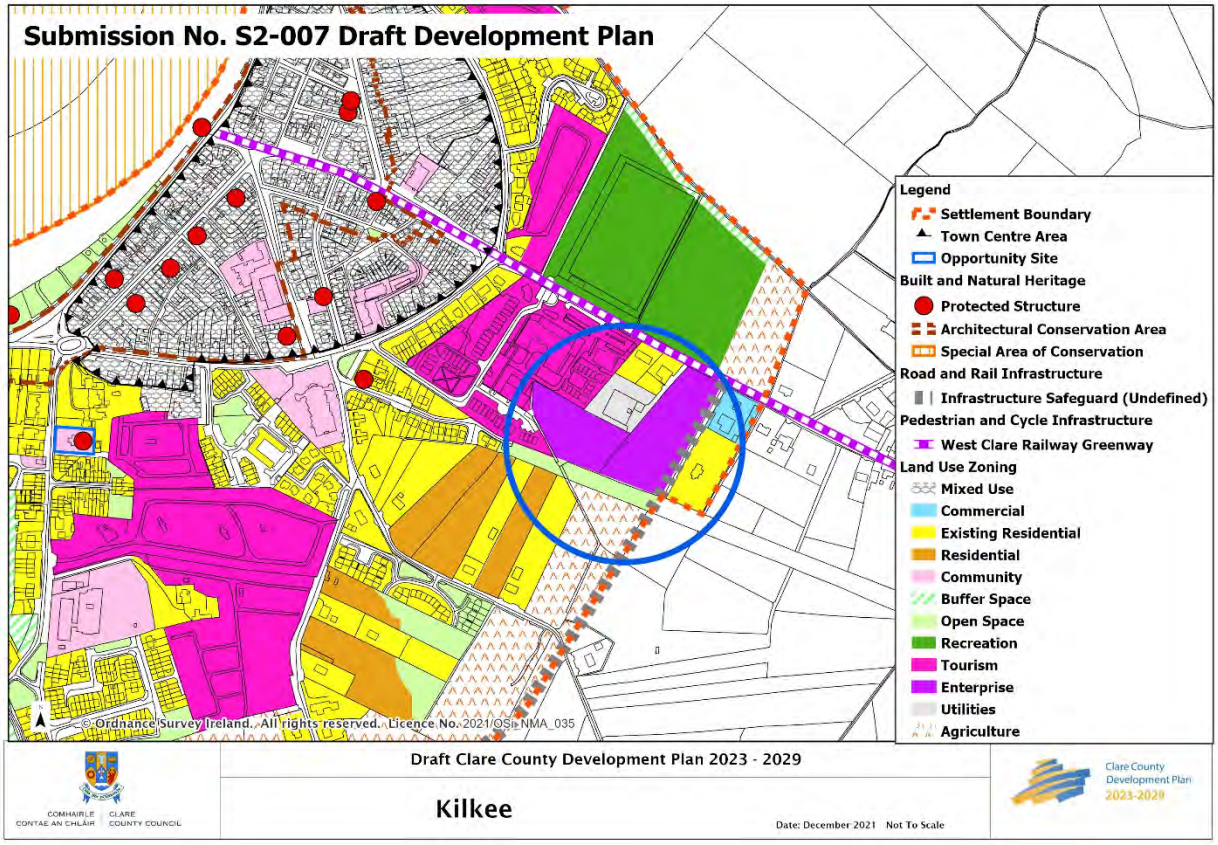

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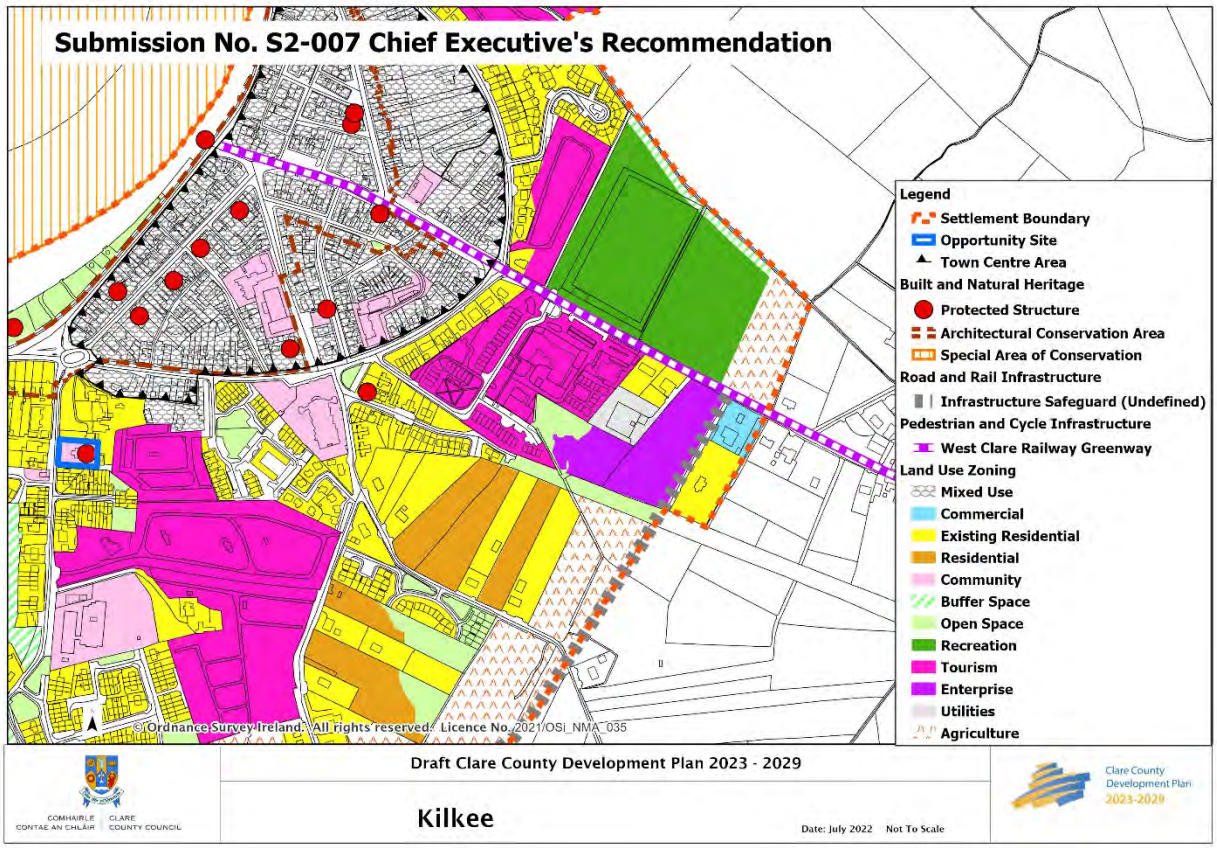

Submission No. S2-007 Draft Development Plan
Legend
Settlement Boundary
Village Growth Area
Built and Natural Heritage
Protected Structure
Recorded Monuments
Special Protection Area
Special Area of Conservation
Proposed Natural Heritage Area
Land Use Zoning
Mixed Use
Existing Residential
Community
Open Space
Tourism
Maritime / Harbour
Agriculture
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COMHAIRLE CONTAE AN CHLÁIR
CLARE COUNTY COUNCIL
Draft Clare County Development Plan 2023 - 2029
Killadysert
Date: December 2021 Not To Scale
Clare County Development Plan 2023-2029


Submission No. S2-007 Chief Executive's Recommendation
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Indicative Access
One Way
Two Way
Land Use Zoning
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Submission No. S2-007 Draft Development Plan
Legend
Settlement Boundary
Town Centre Area
Opportunity Site
Built and Natural Heritage
Protected Structure
Architectural Conservation Area
Special Area of Conservation
Road and Rail Infrastructure
Infrastructure Safeguard (Undefined)
Pedestrian and Cycle Infrastructure
West Clare Railway Greenway
Land Use Zoning
Mixed Use
Commercial
Existing Residential
Residential
Community
Buffer Space
Open Space
Recreation
Tourism
Enterprise
Utilities
Agriculture
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Draft Clare County Development Plan 2023 - 2029
Kilkee
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COMHAIRLE CONTAE AN CHLÁIR | CLARE COUNTY COUNCIL
Clare County Development Plan 2023-2029


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Clare County Development Plan 2023-2029

Submission No: S2/008 Department of Housing, Local Government and Heritage	
Relevant Chapters / Topics	• Heritage • Archaeology • Architecture • Implementation and Monitoring

Summary of Issues Raised in Submission

This is a detailed submission that outlines the requirements of the Department of Housing, Local Government and Heritage with specific respect to Archaeology and Nature conservation.

Archaeology

The Department welcomes Goal XV in Vol 1 Ch. 1 .
Requests that Vol 1 Ch. 2 and Ch. 16 would include specific comments in relation to climate change and archaeology, architecture and cultural heritage and reference to 'Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage'.
The following policy objectives are recommended to be included:

- To promote awareness and the appropriate adaptation of Ireland's built and archaeological heritage to deal with the effects of climate change.
- To identify the built and archaeological heritage in local authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the development plan.
- To undertake climate change vulnerability assessments for the historic structures, sites, and underwater archaeological heritage in its area.
- To develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area.
- To develop resilience and adaptation strategies for the built and archaeological heritage in its area.
- To develop the skills capacity within the local authority to address adaptation / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.

Volume 1 Chapter 8 Rural Development and Natural Resources

The department welcomes CDP8.14. regarding the avoidance of development driven impacts to archaeological heritage. A similar commitment to consider and avoid negative impacts is recommended for inclusion for other types of proposed developments in particular Forestry and Renewable Energy.

Volume 1 Chapter 9 Tourism

The department supports CDP9.4 and CDP9.16. It recommends that the list of named stakeholders in CDP9.16 should be expanded to include the National Monuments Service (DHLGH).

Volume 1 Chapter 10 Sustainable Communities

With regard to CDP10.23 it is requested that a specific commitment to protect historic burial grounds and to appropriately consider the impact to archaeology and cultural heritage from any expansion to existing burial grounds or establishment of new ones be included.

The Department recommends the inclusion of policy objectives for the following

- To protect historic graveyards, including through the avoidance of extensions to them which would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.
- To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.

Volume 1 Chapter 12 Shannon Estuary

It is recommended that specific objectives to protect and promote the archaeological, architectural and cultural heritage of the Shannon Estuary be included and should incorporate:

- To protection, preservation and promotion of the underwater (including intertidal and subtidal) archaeological heritage of the Shannon Estuary.
- To seek and have regard to the advice and recommendations of The Department of Housing, Local Government and Heritage relating to all developments within the Shannon Estuary including flood relief schemes, dredging operations, marina developments and aquaculture.

Volume 1 Chapter 13 Marine and Coastal Zone Management

The Department recommends the inclusion of policy objectives for the following:

- To protect, preserve and promote the marine and coastal zone archaeological, including underwater, heritage of Co. Clare. Where flood relief schemes are being undertaken the Council will have regard to the Archaeological Guidelines for Flood Relief Schemes (DHLGH and OPW 2021).
- The protection for heritage in policy CDP13.15 should be strengthened by the addition of a specific commitment to require the preparation of appropriate Archaeological and Cultural Heritage Impact Assessments (including Underwater Archaeological Impact Assessment) in relation to any development proposals for the islands.

Volume 1 Chapter 16 Architectural and Cultural Heritage

The Department notes a number of inaccuracies in Section 16.4 relating to the legal protection afforded to archaeological sites. An alternative wording is recommended for inclusion.

The Department recommends inclusion of the following policy objectives with regard to the protection of our archaeological heritage;

- To preserve the setting and amenity of all archaeological monuments, with particular regard for upstanding monuments, by ensuring that development in the vicinity of these archaeological monuments is not detrimental to their character or setting by reason of the development's location, scale, bulk or detailing.
- To support the incorporation of monuments into designated open spaces and public amenity spaces, provided this is done in a manner compatible with the protection and proper management and conservation of the monument in question, in particular through ensuring that such monuments are not left vulnerable, e.g. to erosion or to becoming the focus of vandalism or anti-social behaviour, or are not left in, or allowed to deteriorate to be in, a condition incompatible with public safety. Accordingly, where such incorporation takes place an appropriate and enforceable permanent management and conservation plan will be required.
- To preserve means of access to monuments currently accessible to the public and to develop further and better access to monuments, including as part of the design of development in their vicinity (where appropriate).
- All planning applications for new development, redevelopment, any ground works, refurbishment, and restoration, etc. within areas of archaeological potential or within close proximity to Recorded Monuments or that are large in scale will take account of the archaeological heritage of the area and the need for archaeological mitigation.
- To ensure that in appropriate cases developments include as a long-term measure appropriate interpretive material regarding the archaeological features identified or uncovered in the course of development or pre-development work, whether or not such features have been preserved *in-situ* or are themselves presented.
- To provide, in appropriate cases and subject to appropriate safeguards and restrictions, appropriate forms of public access (whether actual or virtual) to archaeological excavations taking place in advance of development.

It is recommended that the impact of activities supported through The Community Monuments Fund (CMF) should be recognised within the development plan. The Department recommends inclusion of the following policy objective;

- To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and

advice of The Department of Housing, Local Government and Heritage.

Volume 1 Appendices

Appendix 1 Development Management Guidelines – A1.9 Archaeological Heritage

The Department considers that the proposed guidelines are lacking in detail and have recommended a revised wording for inclusion in the plan.

Volume 5 Renewable Energy Strategy

With regard to chapter 17 Environmental Considerations & Development Management Advice and in particular Chp 17.2 Environmental Considerations – Built Heritage, the Department advise that particular attention should be drawn to the Wreck Inventory of Ireland Database (WIID) which includes all known wrecks over 100 years old and have full legal protection under the National Monuments Acts (1930–2004). 207 wrecks are recorded in the WIID from Co. Clare—as well as the statutory listings of National Monuments and sites subject to a Preservation Order. There are 37 designated National Monuments within the county and 19 sites subject to a Preservation Order. The Department go on to suggest alternative wording for the final paragraph of that section of the plan.

Strategic Environmental Assessment (SEA) for the Renewable Energy Strategy

The Department considers that potential impacts to archaeological, architectural and cultural heritage from certain renewable energy technologies has not been fully stated. The Department advises that:

- *Solar*: Utility-scale solar projects have the potential to have both direct and indirect impacts, which need to be clearly articulated in the current RES or SEA for the RES.
- *Wave and Tidal Energy*: The potential for direct impacts to maritime/underwater archaeology and cultural heritage through disturbance of the seabed need to be clearly articulated in the current RES or SEA for the RES.
- *Micro Hydro and Pumped Hydro*: Both technologies would require alteration to existing rivers or watercourses creating potential for direct impacts to underwater archaeological heritage. This needs to be clearly articulated in the current RES and in the SEA for the RES.

Volume 6 Wind Energy Strategy

Annex A: Best Practice and General Considerations for wind energy developments in County Clare

The Department states that there is a need to align guidance in relation to the management of archaeological, architectural and cultural heritage issues with the current Wind Energy Development Guidelines for Planning Authorities (DEHLG 2006).

6.1 General Considerations for Applications for Wind Energy Development

The Department recommends the inclusion of additional guidance requiring a Cultural Heritage Impact Assessment—encompassing archaeological, architectural and cultural heritage to be required as appropriate. The Department has suggested additional text regarding same.

6.6 Cultural Heritage – Archaeology

The Department do not consider that this section is aligned with the current *Wind Energy Development Guidelines, Guidelines for Planning Authorities* (DEHLG, 2006) or with the *Framework and Principles for the Protection of Archaeological Heritage*, DAHG (1999)—particularly in light of the scale and character of terrestrial wind energy projects.

The Department recommends that the current wording is replaced, and it has suggested an alternative wording to be inserted in the plan.

Underwater Archaeology

The Department welcomes Section 16.4.1 and recommends the following additions to be made;

CDP 16.8 It is an objective of Clare County Council

a) To safeguard sites, features, protected wrecks, and objects of archaeological interest generally;

b) To secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally and of protected wrecks and underwater archaeological heritage;

c) In securing such preservation, to have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage;

d) To have regard to the government publication Framework and Principles for the Protection of the Archaeological Heritage 1999 in relation to protecting sites, features and objects of archaeological interest; and

e) To advocate for greater financial assistance for the maintenance and improvement of features of archaeological interests in County Clare.

CDP16.9 It is an objective of Clare County Council:

To protect and preserve archaeological sites discovered since the publication of the Record of Monuments and Places.

16.4.1 Underwater Archaeology

The Department notes that County Clare has an extensive coastline and network of inland water bodies with a rich and diverse underwater

archaeology. From the Bronze Age fish weir at Islandmagrath (Fergus Estuary), medieval fish weirs and 18th and 19th century kelp walls in the Shannon Estuary to the possible location of Spanish Armada ships off the west coast of Quilty. Increasing levels of erosion due to climate change are likely to expose even more coastal and intertidal artefacts and features. The protection of underwater cultural heritage in all its forms is a core objective of Clare County Council in relation to archaeological heritage.

Climate change mitigation infrastructure such as flood relief schemes and other forms of flood defence can have significant impacts on both underwater and terrestrial archaeological heritage. Where flood relief schemes are being undertaken the Council will have regard to the Archaeological Guidelines for Flood Relief Schemes (DHLGH and OPW 2022).

The Underwater Archaeology Unit (UAU), Department of Housing, Local Government and Heritage is engaged in the compilation of an inventory of shipwrecks recorded in Irish waters. Wrecks 100 or more years old have full legal protection under the National Monuments Acts. They (along with archaeological objects) are automatically protected and generally do not feature in statutory listings. A total of 207 wrecks are recorded from Co. Clare. The Department are recommending additional objectives be inserted in the plan as follows;

CDP16.13 It is an objective of Clare County Council

a) To protect, preserve and promote the archaeological value of underwater archaeological sites in rivers, lakes, intertidal and sub tidal environments; b) In assessing proposals for development, the Council will take account of the Archaeological Potential of rivers, lakes, intertidal and sub-tidal environments. Where flood relief schemes are being undertaken the Council will have regard to the Archaeological Guidelines for Flood Relief Schemes (DHLGH and OPW 2021).

c) To support the further exploration of the underwater archaeology of County Clare, including the San Marcos project, and any subsequent projects that may arise during the lifetime of this Plan.

<u>Nature Conservation</u>

Core Strategy and Strategic Aims

The Department recommends that the CDP has a clear standalone overarching strategy/policy to undertake Appropriate Assessment (AA), Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Ecological Impact Assessment (EcIA) as required and appropriate in relation to all downstream plans and projects arising from the plan. It is requested that this be clearly stated in the core strategy of the CDP. It is also recommended that Ecological Impact Assessment (EcIA) should be added to the existing **CDP3.1** list. The Department recommends that it is an objective of CDP's to ensure non statutory Ecological Impact Assessment (EcIA) will be carried out for any proposed developments likely

to significantly impact on natural habitats or species.

The Department recommends that it is an objective of the CDP within the Core Strategy to implement the objectives of the National Biodiversity Action Plan 2017-2021.

The Department also recommends that both of the above objective/strategies should also be mentioned in **section 15.1 (Strategic Aims) of Chapter 15 (Biodiversity, Natural Heritage and Green Infrastructure)**. This is in keeping within the framework of the government approved National Biodiversity Action Plan 2017-2021 (NBAP).

The performance indicator to measure how this objective is to be achieved will be the '*Number of explicit policies and objectives for biodiversity and ecosystem services in County Development Plans and other Local plans in the Local Authority.*

Biodiversity, Natural Heritage and Green Infrastructure

Regarding objective **CDP15.3 and European sites** in section b) "likely significant effect" should be changed to "possible significant effect".

It is recommended that a 4th specific subsection for the protection of European sites should be added into … the plan as follows

CDP15.3 (d)

"No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air) transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this plan (either individually or in combination with other plans or projects".

With regard to **CDP15.5 and Natural Heritage Areas (NHA's)** the following should be added in regarding the format of assessment:

CDP15.5 (c)

"To ensure the impact of development within or adjacent to national sites, Natural Heritage Areas, RAMSAR Sites, National Park and Nature Reserves is assessed by requiring the submission of an Ecological Impact Assessment (EcIA) prepared by a suitably qualified professional which should accompany planning applications and council developments".

Regarding **CDP 15.12 under Promoting and Protecting Biodiversity and Wildlife Corridors** the following three objectives should be considered for substituting the current a) and b)…..

"1. *To support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc.), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the Natura 2000 network in Clare."*

"2. *To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to significantly impact on locally important natural habitats, protected species or wildlife corridors. Ensure avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment (EcIA)."*

"3. *To develop and implement a Green infrastructure Strategy for the county within the lifetime of the Plan in consultation with adjoining local authorities, key stakeholders and the public, subject to compliance with Articles 6 and 10 of the Habitats Directive. The Strategy will integrate policies and objectives under a number of headings including; natural heritage, parks and open spaces, built heritage and archaeology, water management, flooding and climate change allowing for a strategic approach to green space planning in the County."*

Regarding **CDP 15.14, under Habitat Fragmentation,** the following should be considered as an addition at the end of the existing text….

"To ensure that traditional field boundaries, ponds or small woods which provide important ecological networks are protected. Where such features exist on land which is to be developed the applicant should demonstrate that the design of the development has resulted in the retention of these features and that the existing biodiversity value of the site hasbeen protected and enhanced."

Regarding **CDP15.15, under Biodiversity on Local Authority Lands,** reference to the use of and prioritisation of native Irish species in landscaping etc. should be incorporated into the existing text.

Regarding **CDP15.16 under Inland Waters, River Corridors and Riparian Zones**, it is recommended that the following text could be added on to the last sentence at the end of section a)….. "which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reducing the need to provide flood defences in the future".
The following text is recommended to be added into the start of section b)…. "ensure that development does not impact on important wetland sites

within river/stream catchments".
It is recommended that Sections d) and e) have an extra line of text added to both "where compatible with nature conservation and biodiversity protection and where potential issues have been addressed in Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Ecological Impact Assessment (ECiA) as appropriate".

Regarding **CDP 15.18, under Peatlands,** the following text is recommended to be added in at the end of the last sentence in the current objective… "and various peatland habitat types". This is both to ensure habitats are mentioned specifically, and not just areas, and that the impression is not given that Raised and Blanket bogs are the only relevant peatland habitat types.
In addition the following is recommended to be added as an extra section under this CDP…."To take into account relevant recommendations from the National Peatlands Strategy when implementing the Plan".

Regarding **CDP 15.19, under Woodlands, Trees and Hedgerows,** The Department recommends that the following objective is inserted under CDP 15.9….. "to ensure there is no net loss of native hedgerows across the county due to developments arising from the plan and where removal is absolutely necessary that the same or greater length of compensatory native hedgerow will be planted. A plan to retain, transplant or provide compensatory planting to ensure there is no net loss of such features must be provided with any development proposal". Another objective recommended for inclusion here is "to encourage the retention of existing mature trees and woodlands in new developments".

In the existing section e) the Department states that it may be appropriate to use a term such as authorised in front of "river drainage/maintenance works and flood repair".

Under Objective **CDP15.20, Natural Resources & Climate Change,** the following is recommended to be included as an extra section…."to ensure the protection, restoration and enhancement of biodiversity during plan implementation to increase the resilience of natural and human systems to climate change".

CDP 15.21, under grasslands, the Department recommends the inclusion of the following text "To complete the habitat mapping of the County (in accordance with A Guide to Habitats in Ireland – (The Heritage Council) in order to identify and record the different grasslands of the County at a detailed level and to use the collected data to ensure that the necessary protection is afforded to areas of importance". This is a commendable and valuable objective and equally applies to peatland, woodland, wetland etc. habitats and the specific CDP sections elsewhere in the plan. Therefore, a standalone objective encompassing all such semi-natural habitats is

recommended for inclusion.

In addition, some definition of "areas of importance" is recommended for inclusion and the following overall objective is therefore recommended for consideration "To complete the habitat mapping of the County (in accordance with A Guide to Habitats in Ireland – (The Heritage Council)) in order to identify and record the different habitats of the County at a detailed level, and to use the collected data to ensure that the necessary protection is afforded to areas of importance, and to protect annexed habitat under the EU Habitats Directive". This latter point will contribute towards addressing the requirements of Article 10, Article 12, Article 13 or the protection of annexed habitats and species outside of the Natura (designated sites) network.

Regarding **CDP15.29, under Alien and Invasive Species,** it is recommended that section b) is amended to the following ……"Ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011)".

In addition it is recommended that an extra section be included with an objective regarding crayfish plague with the following suggested wording "To ensure all local authority works are carried out according to, and adhere to, the 'Check, Clean and Dry' protocol and other relevant Biosecurity Measures and that licensing decisions consider potential crayfish plague issues (e.g. for kayaking events)".

The Department recommends that the CDP has a clear policy to ensure appropriate ecological advice will be available to the council when implementing any biodiversity measures proposed during plan implementation.

The Department recommends the Council include an objective to ensure data sources are made available to the National Biodiversity Data Centre (NDBC) on an ongoing basis.

The Burren National Park

In relation to section 15.2.20.1, the stated area of the National Park needs to be revised to 2,033ha (which includes 209ha of commonage in which NPWS has an interest). The Department considers that Objective CPD 15.23 is rather vague and does not focus specifically on the Burren National Park entity itself, park facilities and the park's relationship with the village of

Corofin and the wider Co. Clare. It is also recommended that this section "be beefed up to reflect the importance of the National Park in the context of the County Development Plan."

Policies and Objectives

It is recommended that policies and objectives for the Development Plan are developed, with the aim of protecting the environment, vistas and zones of visual influence in and around the national park, including the visual character of the park.

The Department states that it would be helpful if the development plan set out the Council's view on how it wishes to see the park developing and expanding and how it views the park as an asset for Co. Clare – both environmental and as a tourism asset - and its potential for assisting in local and county development.

It is recommended that policies and objectives be included in relation to the promotion of the park, signage to the park, traffic, vehicular parking, the facilitation of access to the park by tourists and other visitors while conserving the character, habitats and environment of the park.

It is stated that it would be helpful if the Development Plan set out the Council's support for an administrative base for the Park and visitor facilities, in the village of Corofin.

The submission goes on to state that NPWS would be happy to meet with officials of Clare Co. Co. to further discuss and explore the foregoing issues.

Bats and other protected species

The Department recommends that 'Lighting' objectives are included within the plan both for town and rural areas where incorrect types or inappropriate use of LEDs can have an impact on bat species and other wildlife. The Department notes that currently there is no mention of lighting in the objectives in **Chapter 15** so therefore an objective should be added to address same.

The Department notes that the Light Pollution objective included within **Chapter 11 (Physical Infrastructure, Environment and Energy), CDP11.42**, does include Bat Conservation Ireland Guidance Notes, however EUROBATS guidelines and Dark Sky recommendations should be added here too.

The Department welcomes the references to Bats and other protected species under **Chapter 4 (Urban and Rural Settlement Strategy), Replacement/refurbishment of houses/structures CDP 4.17 c) and CDP 4.18 f).** The Department also welcomes the references to ecological/environmental assessment and protected species under **Chapter 16 (Architectural, Archaeological and Cultural Heritage) Industrial**

Heritage CDP16.3 and Proposed Works to Buildings - Protected Species and Environmental Considerations CDP16.6. It is however slightly unclear to the Department if CDP16.6 covers all of the Chapter (for example 16.3.3 Vernacular Heritage) and an amendment to clarify this is requested.

The Department has also requested the embedding of similar objectives elsewhere within the Plan for example within **Chapter 11 (Physical Infrastructure etc.)** which does not seem to contain such a reference to protected species currently.

The Department requests that the Plan should acknowledge the strict protection, provided for by the Habitats Directive, which applies to Annex IV species (e.g. Bats and Otter) wherever they occur; and should provide for this protection to be fully implemented in any plans and projects arising from the Plan. This, the associated objective and the below detail on protected species should be added in as a new section in Chapter 15.

The Department recommends that a specific objective should be included requiring that surveys for Annex IV strictly protected species and other species protected under the Wildlife Acts (for example Barn Owls), are included in all development and maintenance proposals (e.g. refurbishment of houses, road and bridge maintenance etc.) where there is a reasonable likelihood of these species being present and affected by the development. It should be noted that adherence to the previous NPWS guidance to the Council on annex IV species, Circular Letter NPWS 2/07 (16 May 2007), is required (or to future updates of same) and this should also be included within the objective.

<u>Greenways, Blueways etc. and Tourism</u>

As advised in the National Greenway Strategy, greenways and other associated linear trails should be designed to take into account, and avoid where necessary, the sensitivities of natural heritage. The Department recommends that such proposals are subject to route/site selection processes to ensure that impacts to biodiversity and nature conservation interests are avoided. The Department recognises the responsibility on the Local Authority to ensure objectives for proposed Greenways or Blueways recognise the need to protect and conserve biodiversity, including European sites and this may impact the ability to deliver desired outcomes.
The Department therefore recommends in **Chapter 10 (Sustainable Communities), Development Plan Objective: Recreational Routes CDP10.11-g)** to ensure that the development of any off-road walking and cycling routes, blueways and peatways is informed by an appropriate level of environmental assessment, including all necessary reports to assess the potential impact on designated European sites and any impacts that may arise from increased visitor pressures.

With regard to **Chapter 11 (Physical Infrastructure, Environment and Energy), Development Plan Objective: Direct Access onto National Roads CDP11.13-d)** it is recommended to include the following text 'To subject any proposals for greenways, new routes and trails to screening for appropriate assessment and an ecological impact assessment where appropriate to ensure that the design and operation of the proposal is in full compliance with the EU Habitats Directive……'

It is stated that **CDP10.11-g)** only refers to non-defined environmental assessment to assess impacts with no mention of assessment type required or avoiding impacts

It is stated that **CDP11.13-d)** only mentions some of assessments, omitting NIS, ER, EIAR and does not mention avoiding impact on NHA's, and biodiversity in general.

Consequently, the Department recommends that the following objective now be added in to both of these Chapters… "to ensure the development of all Greenways, Blueways and Peatways are subject to route/site selection processes to ensure that negative impacts to biodiversity and nature conservation interests are avoided".

Chapter 9 Tourism, CDP9.4: Tourist Developments and Tourist Facilities

In terms of Nature Conservation, it is recommended that Ecological Impact Assessment (EcIA) needs to be added to the list of assessments. In addition, it is recommended that the avoidance of impacts to biodiversity and nature conservation interests should be specified also in terms of "the receiving environment".

In relation to section d) it is recommended that the LA takes an active role and therefore it is suggested that "To work with the relevant authorities" part of the sentence is removed. Also, in terms of d) only European sites are mentioned regarding sustainable limits, therefore it is recommended that biodiversity sites and nature conservation interests should be added to the end of the objective here.

<u>Clare County Energy Strategies</u>

The Department brings to the Council's attention that The Climate Change Advisory Council (CCAC) has recently submitted Ireland's first carbon budget programme, broken down into two five-year carbon budgets, to the Government. In its technical report to accompany the proposed carbon budgets, the advisory council has said:

"Renewable energy infrastructure and forest plantations must not be at the expense of biodiversity, already in a crisis of its own".

Regarding both the Renewable Energy Strategy (RES) and the draft CDP it is recommended that this caveat should be embedded into the plans. An example given is with regard to **CDP objective 8.12,** which could be amended to include wording such as 'subject to the requirement of biodiversity protection' or the above statement could be added as a separate new CDP objective in either this Chapter and/or within Chapter 2 Climate Action. It is also suggested that it would be appropriate to embed it within **CDP11.47 (Chapter 11 Physical Infrastructure, Environment and Energy).**

The Department recommends that it is an objective of the CDP to ensure the protection, restoration, and enhancement of biodiversity during plan implementation to increase the resilience of natural and human systems to climate change.

The Department notes that the Wind Energy Strategy (WES) is to remain as per CCDP 2011-2017 and that this was the last time a NIR was prepared, and an Appropriate Assessment was undertaken for the strategy. Notwithstanding Planning Circular Letter 'Circular PL 20- 13' which gave advice to operate existing Development Plan policies and objectives until further notice it does not remove the need for assessment of same. The assessment is important for a number of reasons;

- Since the adaptation of the WES the boundaries of SACs and SPAs may have changed.
- There are other zoning issues (such as some pNHAs and NHAs that fall currently within the 'Strategic Areas' and the identification of the West Clare Uplands Important Bird Areas (IBA) Hen Harrier population since the Strategy was put in place).
- The national landslide susceptibility mapping was completed between 2007-2016 and may not have been taken account of in the original assessment.
- Repowering is also a concern with respect to Wind Farms and due to the outdated nature of the current WES has not been considered.
- New case law and guidance has been provided by numerous National and European Court of Justice (ECJ) cases since 2010 and in addition new scientific advice, monitoring and survey data etc. is also now available.
- In combination and cumulative impact affects through projects already permitted have not been assessed.
- No assessment seems to have been carried out since S.I. No. 477/2011 (the European Communities (Birds and Natural Habitats) Regulations 2011) came into force.

On this latter point the Department requests that the Council should specifically note under these regulations Regulation 27 (Duties of public authorities relating to nature conservation), Regulation 42 (Screening for Appropriate Assessment and Appropriate Assessment of implications for European Sites) and Regulation 46 (Review of existing plans) and sets out that the Council may wish to get legal advice on the requirement to carry out an updated assessment.

In terms of the Mitigation Measures specific to the Renewable Energy Strategy (RES) for the Chapter 11 – Micro Hydroelectric Power (MHD) the Department notes that a proposed new objective is that "An Ecological Impact Assessment should identify all ecological factors, including ecological corridors, be accompanied by appropriate surveys, undertaken at the correct time of year and be undertaken by a suitability qualified and experienced ecologists". The Department notes that this is not just relevant

as mitigation for MHD and should be included in the General Mitigation section (i.e. Proposed New Objectives/NIR Mitigation to be included in Chapter 1 and incorporated into the Chapter as an extra Objective under RES 1.1).

NIR, SEA and related issues

The Department have questioned the accuracy of Figure 5.6.6 in the SEA report, "Protected Peatlands within County Clare", as it shows only the five raised bog sites.

The Department notes that the 15km zone is commonly used in screening for AA and would like to highlight that 'likely significant effects' can occur beyond 15km specifically in relation to River SACs and also to sites designated as SPAs for bird species. The Department recommends that flight collision and barrier risks are considered in the NIR, for example, with respect to the movement of species between SPAs and migratory bird routes across the county.

Strategic Environmental Objectives

In terms of Climate Change Mitigation Measure CC4 it is recommended that Peatland and Wetland habitats should be added to the list of carbon sinks as some habitats such as heaths and swamps would not be covered under the current list otherwise.

Under the Biodiversity, Flora and Fauna Section a primary commitment in the NBAP is to move towards no net loss of biodiversity through strategies, planning, etc. therefore no net loss of biodiversity is recommended for an additional inclusion under/as Measure B7

Monitoring

While the Department welcomes the attempt to include a Strategic Environmental Objectives, Targets and Indicators Monitoring Plan, there is scope to improve the quantitative and qualitative measurable data proposals regarding Indicators in the nature conservation/biodiversity examples. Suggested amendments have been included in the submission.

Regarding **CC4** The Department welcomes the target and requested that peatland habitat should be mentioned in order to encompass heathland, Molinia meadow, transition mire etc.

The Department has recommended that as well as the planning sections the enforcement section should also be included.

In terms of monitoring both use of the existing Clare County Council habitat mapping of the County project data and use of the Environmental Sensitivity Mapping (ESM) web tool are relevant.

Proposals such as an audit of such mapping information and of planning permissions, enforcement files etc. would seem appropriate. NIS, ER, EIAR or EcIA generated biodiversity data and an audit and/or spot check of enforcement/mitigation arising from same would seem appropriate and relevant.

In terms of **CC8** the same Indicator/Data Sources and Source/Responsibility/Frequency issues and suggestions as per CC4 apply. It has also been recommended that amendments are made to include for measurements and indicators such as net length of hedgerow and area of various habitats etc to be used.

Other Issues

With regard to the Development Management Standards (DMS) section it is recommended that all development proposals recognise both the protection and enhancement of biodiversity.

It is also recommended that the Plan provides for unauthorised developments to be addressed in a comprehensive manner to ensure that such development does not impact biodiversity in the county, including impacts to sites designated by law. It is recommended that Plan should have a clear objective to ensure that the planning enforcement system works effectively and to ensure that sites are restored as required.

Chief Executive's Response

I would like to thank the Department of Housing, Local Government and Heritage for their very comprehensive submission and set out my response to the issues raised below.

Archaeology

Climate Action

I note the request to expand our objectives in relation to climate change and archaeology, architectural and cultural heritage. I acknowledge that climate change is a significant threat to cultural heritage due to such occurrences as storm surges, increased rainfall events and coastal erosion along the county coastline. The Clare Climate Change Adaptation Strategy seeks to undertake a risk assessment of the Heritage and Cultural Assets in the county to assess the vulnerability and risk to the historical environment from the impacts of climate change and to help build resilience to these important assets. In this regard I propose to include an additional objective in Volume 1, Chapter 16 Architectural, Archaeological and Cultural Heritage as recommended in the submission and as set out in my recommendation.

Rural Development and Natural Resources

I acknowledge the need to protect archaeological heritage when considering Rural Development and Natural Resources and the impacts that various types of proposed developments as raised in the submission. I consider it appropriate to incorporate additional wording within objective CDP 8.8 Natural Resources which will support the avoidance of negative impacts on archaeological heritage as a result of proposed developments and which is set out in my recommendation.

Tourism

I welcome the support for Objectives CDP9.4 and CDP9.16 in particular and agree

with the recommendation to include the National Monuments Service (DHLGH) as one of the named stakeholders in CDP9.16.

Sustainable Communities

I note the Department's recommendation to include additional objectives in relation to Burial Grounds/Crematoria in CDP10.23 regarding firstly to the protection of historic graveyards and the avoidance of extensions to them which would have an impact on sub-surface archaeological remains and secondly to ensure local authority owned historic graveyards are managed and maintained in accordance with conservation standards and that local communities that care for them receive advice regarding such standards. I am of the opinion that these principles are inherent in the development management process and that there is no requirement to expand on the proposed objective in the Draft Plan.

Shannon Estuary

The Strategic Integrated Framework Plan for the Shannon Estuary is included as Volume 9 to the Draft Plan and the rich and important archaeological, architectural and cultural heritage of the Shannon Estuary in which the international significance of the underwater archaeological heritage is clearly recognised. It contains specific objectives and mitigation measures to allow for protection of these features and these are supported further in the Draft Plan Volume 1 through the overarching objectives of CDP12.1 and CDP12.2. In addition, there is a specific objective CDP16.13 Underwater Archaeology included in Chapter 16 of the Draft Plan.

As part of the development management process planning applications are referred to Prescribed Bodies as set out in legislation, which includes the Department of Housing, Local Government and Heritage. I therefore consider that there is existing strong policy support provided in the Draft Plan.

Marine and Coastal Zone Management

I note the recommendation in the submission to include additional policy provision for in relation to the protection of archaeological sites in the marine and coastal environments. I consider it appropriate to strengthen policy support in this regard by amending policy objectives CDP16.13 Underwater Archaeology and CDP16.11 Archaeology and Infrastructure Schemes to incorporate wording as set out in my recommendation below.

Section 13.18 relates to Island Development within the Shannon Estuary and I refer to my response regarding the Shannon Estuary as set out above and reiterate the existing strong policy support already provided in the draft Plan.

Architectural and Cultural Heritage

I acknowledge the comments in the submission regarding and some inaccuracies in the text of section 16.4 and this will be updated in line with the information provided in the submission and as set out in the recommendation.

The Community Monuments Fund is recognised as a very positive initiative which has strong community and public involvement and provides valuable employment for heritage professionals and trades. I agree that the impact of this initiative should be

recognised and the objective recommended for inclusion in the Draft Plan is appropriate and will be incorporated into Objective CDP16.7 as set out in my recommendation below.

Development Management Guidelines – A1.9 Archaeological Heritage

The additional guidance in the submission is noted and will be incorporated into the Draft Plan as set out in my recommendation.

Renewable Energy Strategy

Clare County Council recognise the advice that attention should be given to the Wreck Inventory of Ireland Database when considering offshore development. As outlined in Section 4.5 of the RES, given the estimated timelines and questions over ownership and management of Ireland's future offshore wind energy generators, the primary focus of the RES is on onshore service infrastructure in preparation for when the time comes for the delivery of offshore installations.

The spatial analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level mapping at County level. It follows a sieve analysis strategy which seeks to identify Accessible and Planned strategic development sites. This identifies the potential of a renewable energy resource which is technically possible and balances it with the competing interests of other industries and the statutory consideration for ecological, environmental and heritage.

I note the request for a suggested revision to section 17.2 of the RES which relates to Built Heritage. I am satisfied that there is strong policy support in the Draft Plan which provide safeguards for heritage sites.

All the draft Development Plan objectives in Volume 1 and settlement plans in Volume 3 have been subject to SEA, AA, and SFRA which have informed their development as a critical part of the draft CDP preparation process. All national guidelines and regulations in terms of biodiversity and habitat protection which are required as a function of proper planning procedures will be followed as part of the development management process for any planning application. General safeguards for amenity and environmental protection are included in section 17 of the draft RES as well as a comprehensive range of environmental protection objectives within the Draft Plan.

Figure 5.6.6 “Protected Peatlands within County Clare” in the SEA Environmental Report for the RES will be amended to reflect all the raised bog sites in the county and will be incorporated into both Environmental Reports.

Wind Energy Strategy

The Wind Energy Strategy will not be reviewed until such time as the publication of the update to the Wind energy Guidelines for Planning Authorities. In the Draft Plan there is a commitment through the inclusion of a specific objective to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the updated Guidelines.

Nature Conservation

Core Strategy

Taking note of the comments in the submission I propose Objective CDP 3.1 in Chapter 3, Core Strategy be amended as set out in my recommendation.

Biodiversity, Natural Heritage and Green Infrastructure

I note the comments and suggested inclusions for a number of objectives in Chapter 15 of Volume 1 of the draft Plan. In this regard I refer to my response and recommendation to submission S2-011 whereby I recommend inclusion of additional text within Chapter 15 in relation to 'no net loss of biodiversity', as while I am satisfied that the policies and objectives of the Draft Plan appropriately address the issue of biodiversity and biodiversity loss, I consider further text should be included in the Plan to reflect the scale of the biodiversity emergency. This inclusion is proposed for Section 15.2.1 Biodiversity and Climate Change, Chapter 15 of Volume 1. Given the cross-cutting nature of biodiversity loss and enhancement I also consider it appropriate to include a section within the Development Management Guidelines in section A.1.3 as set out in my recommendation.

Burren National Park

Clare County Council is working in partnership with National Parks and Wildlife Services and Failte Ireland in the delivery of the Corofin Enhancement Plan which will include proposals for a new National Park and Wildlife Services facility in Corofin Village. This joint project has established a regular forum were staff from the Planning Authority and NPWS as well as other interested stakeholders meet and engage on issues relevant to the park and I am satisfied that this arrangement is a satisfactory forum to discuss wider issues as they arise.

Separately Clare County Council in partnership with Galway County Council are advancing an application for the wider Burren area to be included on the World Heritage site tentative list. If successful in this application Clare County Council, as the lead authority will be responsible for populating a detailed dossier of information related to the Burren which will include the National Park. This will in turn inform later iteration of the CDP.

I am satisfied that there is sufficient referencing and support to the importance of the Burren National Park in the Draft Plan.

Bats and Other Protected Species

I note the suggestion in relation to CDP11.42 in Chapter 11 in relation to Light Pollution and agree the inclusion to reference 'EUROBATS' in part c) of the objective. Reference to dark skies is already provided for in objective CDP15.28 and therefore no further inclusion is necessary.

Clare County Energy Strategies

The Wind Energy Strategy is incorporated within the Clare County Development Plan 2023-2029 based upon the previous Wind Energy Strategy without any material changes to the proposals within it. It has undergone its own Appropriate Assessment as part of its incorporation into the adopted Clare County Development Plan 2017-2023. It is expected that the WES will be reviewed when guidance on wind energy

development is published by central Government but as an interim measure the current WES is included within the CDP and the mitigation measures that have been proposed as part of the AA of the Wind Energy Strategy have been checked against the other elements of the CDP to check for consistency. Therefore, the Natura Impact Assessment accompanying the Clare County Development Plan addresses the impacts of the Wind Energy Strategy in combination with the rest of the CDP and references the requirements of the WES and the inherent mitigation measures where relevant to the current assessment. Any revisions to the WES in the future will be subject to a separate assessment.

Not withstanding the issues raised by the Department in terms of the changes which have taken place since the initial preparation of the WES and its associated NIR, Clare County Council are satisfied that given there have been no changes to the WES since its preparation, the level of assessment which has been undertaken as part of the preparation of the new Clare CDP 2023-2029, the level of protection provided in terms of the protective and nature conservation objectives identified and the extensive assessment required at a Development Management level which takes into consideration any new data sets (including designations), information, scientific results arising from other developments such as those pertaining to Hen Harriers that any new application for a Wind Farm in an area deemed suitable within the WES or for Repowering will be assessed to the greatest level ensuring that developments are in accordance with national and European guidance.

NIR, SEA and related issues

The reference to Figure 5.5.6 in the SEA report of the SEA Environmental Report is noted and a correction will be made to the map to show the correct number of raised peat bogs.

As noted in Section 4.2 of the NIR, an initial distance of 15km from the Draft CDP administrative boundary was selected for consideration of European sites for the purposes of the NIR. This was further informed by other relevant criteria notably analysis of drainage catchments and connectivity between sites. The ZoI encompasses European sites within the County Clare boundary, island/marine European sites as well as transboundary or adjacent sites within the ZoI. This total ZoI was deemed to be sufficient to cover all potential significant adverse effects which could arise from the implementation of the CDP on European sites.

During the assessment of potential impacts on the scale of the ZoI considered species range and varied dependent on the species in question. For example, while some species may only have ranges as small as several meters' others like migratory birds or birds moving between European sites may have a much wider range spanning hundreds of kilometers. The potential impact upon habitat fragmentation of migratory routes for these species is considered within the NIR.

To address the collision risk issue it is proposed to amend CDP15.14 Habitat Fragmentation and Green Infrastructure Corridors to include an extra part which will address risk of collision which is included in my recommendation below.

Strategic Environmental Objectives

In terms of Mitigation Measure CC4 this will be updated to include Peatland and Wetland habitats in the CDP and RES SEA Environmental Reports as set out in the recommendation below. CC4- Maintain and protect our natural carbon sinks (bogs/marshes/forests/fens/Peatland and Wetlands) as decarbonising areas which can serve a dual purpose in terms of enhancement of biodiversity and mitigation against Climate Change.

I note the comments in relation to moving towards no net loss of biodiversity and I propose to make an inclusion into CDP3.1 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment to provide policy support in this regard.

Monitoring

The monitoring section will be finalised taking on board the recommendations of the Department as outlined in the submission, as part of the final Plan.

Chief Executive's Recommendation

I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission as follows:

- Chapter 16 Architectural, Archaeological and Cultural Heritage, include an objective under section 16.4 Archaeological Heritage to read:

"CDP - Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage
It is an objective of the Council to support the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage 2019, as published by the Department of Culture, Heritage and the Gaeltacht and any subsequent guidance or plans for dealing with climate change and archaeological heritage. The Council shall seek to:
• Promote awareness and the appropriate adaptation of Ireland's built and archaeological heritage to deal with the effects of climate change;
• Identify the built and archaeological heritage in Local Authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the Development Plan;
• Undertake climate change vulnerability assessments for the historic structures and sites in its area, subject to resources and funding;
• Develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area;
• Develop resilience and adaptation strategies for the built and archaeological heritage in its area;
• Develop the skills capacity within the Local Authority to address adaptation/ mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.

CDP objective numbering to be revised for those following this insertion for the remainder of the chapter.

Rural Resources

- Chapter 8 rural Development and Natural Resources, section 8.3 Natural Resources, include additional wording to objective CDP 8.8 Natural Resources as follows:

"It is an objective of Clare County Council:
To facilitate, encourage and appropriately manage the development of the natural resources of the County and to ensure that this is done in a sensitive way, eliminating any significant adverse effects on the natural and built environment, negative impacts on archaeological heritage and in compliance with all relevant legislation and planning requirements."

Tourism

- Chapter 9 Tourism, section 9.2.17 Heritage and Cultural Tourism, include additional wording to objective CDP9.16 Heritage and Cultural Tourism as follows:

"It is an objective of Clare County Council:
To work with stakeholders including the Office of Public Works, the Heritage Council, the Arts Council, National Monuments Service ((DHLGH), local communities and businesses to support the development of heritage and cultural tourism in County Clare".

Marine and Coastal Zone Management

- Chapter 16 Architectural, Archaeological and Cultural Heritage, CDP 16.11 Archaeology and Infrastructural Schemes – additional wording as follows:

"To ensure that decisions relating to development (including infrastructure associated with broadband, telecommunications, renewable energy, major road/ rail infrastructure, flood relief schemes and other services) which may have implications for Recorded Archaeological Monuments /Sites, Zones of Archaeological Potential or undiscovered archaeology, are informed by an appropriate level of archaeological investigation undertaken by qualified persons and in the case of flood relief schemes have regard to archaeological Guidelines for Flood Relied Schemes (SDHLGH and OPW 2021) ".

- Chapter 16 Architectural, Archaeological and Cultural Heritage, CDP16.13 Underwater Archaeology - additional wording in part a) as follows:

"a) To protect, ~~and~~ preserve and promote the archaeological value of underwater archaeological sites in rivers, lakes, coastal, marine, intertidal and sub tidal environments;"

Architectural and Cultural Heritage

- Chapter 16 Architectural, Archaeological and Cultural Heritage, Section 16.4 Archaeological Heritage – Update and replace relevant parts of the section with the following:

"The strongest legal protection under the National Monuments Acts in respect of monuments is afforded to national monuments of which the Minister for Housing,

Local Government and Heritage or a local authority is owner or guardian or in respect of which a Preservation Order under the National Monuments Acts is in force. A national monument is any monument the preservation of which is a matter of national importance by reason of the archaeological, architectural, historical, traditional or artistic interest attaching to it. The consent of the Minister is required for interference with such national monuments or ground disturbance.

around or in proximity to them. Under the National Monuments Acts the Minister and local authorities must maintain national monuments of which they are owners or guardians (the OPW has day to day responsibility in relation to national monuments owned by or in guardianship of the Minister for Housing, Local Government and Heritage) and, subject to such restrictions as are reasonably necessary, seek to provide public access to such national monuments. A list of National Monuments designated in each local authority area and of the Preservation Orders currently in force can be found at www.archaeology.ie.

All wrecks over 100 years old (whether previously known or just discovered) and all archaeological objects situated underwater, are protected under section 3 of the National Monuments (Amendment) Act 1987. Wrecks of any date and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the making of an underwater heritage order, if considered to be of sufficient historical, archaeological or artistic importance to merit such protection. Information on known wrecks can be found in The Department's Wreck Viewer at www.archaeology.ie."

- Chapter 16 Architectural, Archaeological and Cultural Heritage – CDP16.7 Maintenance and Improvement -include additional point in objective as follows:

a)"To advocate for greater financial assistance, including the Built Heritage Investment Scheme and the Historic Structures Fund, for the maintenance and improvement of architectural heritage in County Clare;
b) To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of The Department of Housing, Local Government and Heritage".
~~b)~~ c) To provide advice and guidance to community groups, owners and occupiers with regards to the maintenance and repair of buildings and structures of architectural heritage importance and to promote initiatives by the Council, the Heritage Council, local communities, heritage property owners and other stakeholders pursuing the maintenance and improvement of the architectural heritage; and
~~c)~~ ~~d)~~ To undertake a risk assessment of the Archaeological and Architectural Heritage and Cultural Assets in the County to assess the vulnerability and the risk to the historical environment from the impacts of climate change and to help build resilience to these important assets."

- Appendix 1 – Development Management Guidelines – A1.9 Archaeological Heritage – include additional section as follows:

"In considering proposals for development, applicants are advised to consult the archaeological maps (available for viewing in the Planning Department) in order to ascertain whether their development is located in an area of archaeological potential. If a proposed development site is located in such an area or is large in scale (greater than 0.5ha or over 1km in length for a linear scheme), it is advisable to consult with the Council at the earliest possible opportunity. The National Monuments Service of The Department of Housing, Local Government and Heritage may also be consulted, including via the Developments Applications Unit: manager.dau@housing.gov.ie.

All planning applications for new development, redevelopment, any ground works, refurbishment and restoration, etc. within areas of archaeological potential or within close proximity to Recorded Monuments must take account of the archaeological heritage of the area and the need for archaeological mitigation. Any persons proposing to carry out works at or in relation to a Recorded Monument must give 2 months written notice, in advance, to the Minister for Housing, Local Government and Heritage. Consent of the Minister for Housing, Local Government and Heritage is required for any interference with or works to a National Monument (whether or not the works are archaeological in nature)

Developers should give due consideration to the following:

- *Framework and Principles for the Protection of Archaeological Heritage*, DAHG (1999)
- P*lanning Leaflet 13: Archaeology and the Planning Process,* OPR/DHLGH (2021)
- *Archaeology & Development: Guidelines for Good Practice for Developers*, Heritage Council (2000)

<u>Renewable Energy Strategy – SEA</u>

- Revise Figure 5.6.6 "Protected Peatlands within County Clare" in the RES SEA Environmental Report to include the full complement of raised bog sites in the county.

<u>Core Strategy and strategic aims</u>

- Revise parts b) and e) of objective CDP 3.1 as follows:

b) To require project planning to be fully informed by ecological and environmental constraints at the earliest stage of project development and any necessary assessment to be undertaken, including assessments of disturbance to species together with the preparation of both statutory and non-Statutory Ecological Impact Assessments (EcIA), where required;

e) To require the preparation and assessment of all ~~planning applications~~ Plans and Projects ~~in the plan area~~ arising from the Plan to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report contained in Volume 10 of this Development Plan;"

<u>Biodiversity</u>

- Volume 1, Appendix 1, Development Management Guidelines, section A.1.3 – insert text as follows:

"In line with current planning policy, Clare County Council, as the planning authority, should seek to ensure that all proposals achieve 'no net loss' of biodiversity as a minimum outcome. The Planning Authority, in assessing proposals must adopt the No Net Loss principle with respect to Biodiversity across the county. The Planning Authority will take recognition to both protect and enhance biodiversity across the County in line with the requirements of the National Biodiversity Action Plan, the Biodiversity Climate Adaptation Plan, the County Clare Biodiversity Plan and the Clare County Council Biodiversity Manual, Biodiversity Best Practice Guidelines for Clare County Council staff. No net loss of biodiversity, in essence, refers to the point where biodiversity gains from targeted conservation activities match the losses of biodiversity due to the impacts of a specific development, so that there is no net reduction overall in the type, amount and condition (or quality) of biodiversity over space and time.
A 'net gain' means that biodiversity gains exceed a specific set of losses. The result is a positive outcome for biodiversity rather than just keeping things the same pr preventing loss or damage."

<u>Bats and other Protected Species</u>

- Volume 1, Written Statement, Chapter 11, Objective 11.42 Light Pollution – to reference "EUROBATS" in part c) of the objective.

<u>NIR, SEA and related issues</u>

- Volume 1, Written Statement, Chapter 15, CDP 15.14 Habitat Fragmentation and Green Infrastructure Corridors -include part b) as follows:

"It is an objective of Clare County Council:
a) To ensure that development proposals support and enhance the connectivity and integrity of habitats in the Plan area by incorporating natural features into the design of development proposals; and
b) To ensure that the potential impacts upon the migratory routes of fauna including birds and bats and the movement of species between European Sites are or are fully considered within the relevant ecological assessment. These assessments shall fully consider flight collision risks, habitat fragmentation and barrier risk as required."

<u>Strategic Environmental Objectives</u>

- CDP and RES SEA Environmental Reports – amend as follows:

"CC4 - Maintain and protect our natural carbon sinks bogs/marshes/forests/fens/Peatland and Wetlands) as decarbonising areas which can serve a dual purpose in terms of enhancement of biodiversity and mitigation against Climate Change.

- Volume 1, Chapter 3 Core Strategy, CDP3.1 Appropriate Assessment, Strategic Environmental Assessment, Strategic Flood Risk Assessment – include additional point d) as follows:

"d) To require all proposals to ensure there is 'no net loss' of biodiversity within developments."

Submission No: S2/009 –Department of Education	
Relevant Chapters / Topics	• **Sustainable Communities** • **Education Facilities**

Summary of Issues Raised in Submission

This submission relates to the provision of primary and post-primary educational facilities in County Clare, as follows:

Projected Population Increase

Notes the population distribution across the count and that in determining the hierarchy of settlements that availability of education facilities was included in the variety of strategic long-term planning and land use considerations.

In relation to Ennis, the Department welcomes the focus on planning for educational requirements in the context of the long-term 2040 growth ambition for Ennis.

Objectives on Community Infrastructure

The Department generally welcomes objectives contained in Chapter 10 Sustainable Communities and notes the statement in Section 10.17 that rural depopulation is a significant challenge to the provision and ongoing retention of educational services. The Department further welcomes the commitment in Objective 10.16 Primary and Secondary Education to following the 2008 Code of Practice on the Provision of Schools and the Planning System. In relation to Objective 10.19 Dual Use Facilities the Department requests that reference in made in this objective to the Government's guidelines on the use of school buildings outside of school hours.

GIS mapping of existing school sites and zoned school sites

To strengthen the zoning provision on existing school sites and to aid future planning, the Department requests, if possible that all existing and future school sites are zoned and mapped on the Council's GIS system

Potential educational requirements arising from the draft plan

The existing network of schools in Co. Clare comprises 110 primary schools, 18 post primary schools and 2 special schools. Based on all factors, a view has been formed concerning projected future requirements and how they can best be met at each settlement and commentary is provided in this regard. In its assessment of population trends, the Department uses a number of parameters to determine future needs. Requirements at primary level are currently assessed on 11.5% of population and 25 students per classroom. Post primary requirements are assessed at 7.5% of population numbers.

Ennis

The Department welcomes the commitment in Objective V3(a)9 for the upgrade of road improvement to facilitate cycle and pedestrian commute to Knockanean NS and the objective concerning the site for potential future school use at Roslevan.

The zoning of the site of the Holy Family School for mixed use development (rather than community use) is a concern to the Department as the rationale for this is not clear. The Department will engage further with the Council on this matter.

At both primary and post-primary the Department anticipates that when account is taken for underlying demographics trends the level of potential increase in school place requirements arising from the increased population will be met by existing facilities.

Limerick Shannon Metropolitan Area

The Department notes that the projected population increase in this area, in tandem with those outlined in the Limerick County Development Plan, will generate significant potential additional educational requirements in the area. The Department refers to their submission to the Limerick CDP and the need for at least one additional primary school site be zoned to meet the future needs of this area and the potential need for a new post-primary school depending on the capacity of the existing schools to expand. The importance of protecting existing schools and their expansion capacity is highlighted.

Parteen

The Department welcomes the zoning of the school site to Community Facilities C1 to facilitate future expansion of the school, however, concerns are noted in relation to the potential for additional community facilities on the site. The Department considers that additional community facilities on this site would inhibit any future expansion requirement of this school.

The Department also notes the statement in Volume 3b that a mixed use zoning be applied to the school in Parteen to enable it be relocated during the lifetime of the plan which conflicts with the statement elsewhere in the draft plan that zones the school site to C1, which the Department regards as the appropriate zoning.

Cratloe

The Department welcomes objective C2 in the draft plan concerning C2 Cratloe School, Grotto and Associated Grounds. The objective is to retain these lands in community use to facilitate any future expansion of the existing school on the site.

Proposed South Clare/University of Limerick SDZ

The Department notes that a population of 3,500 is proposed this area which is currently not served by a school. It is understood that Clare County Council intend that a primary school site be zoned in the SDZ. The Department agrees with this and notes that the size of the school required will become clearer as the plans for the proposed SDZ are developed. However, it is considered that a primary school site should be designated in a greenfield area.

In relation to post-primary education, given its proximity to Limerick City, it would appear that the requirements of the population in the SDZ would be met by the schools in Limerick City East, namely in Castletroy. The Department notes that a new school is underway and is an area targeted for the provision of another school in the draft Limerick CDP 2022-2028. The Department notes that the if the SDZ is approved in Co. Clare, it will compound the requirement for post-primary places in Castletroy.

Primary School Requirements

The Department provides details of existing primary school facilities and potential future requirements to meet projected population increase, as follows:

- Shannon, Sixmilebridge, Clonlara, Ballycannon North (Meelick) and Cratloe - projected population increase will be met by existing facilities in the respective settlement.
- Athlunkard - projected population increase will be met by schools in Limerick City
- Bunratty - projected population increase will be met by existing schools in Sixmilebridge and/or Cratloe.
- Ardnacrusha - projected population increase will be met by existing facilities in Parteen
- O'Briensbridge - projected population increase will be met by existing facilities in Bridgetown.

Post-Primary School Requirements

The Department provides details of existing post-primary school facilities and potential future requirements to meet projected population increase, as follows:

- Shannon – will require expansion of existing school facilities to meet the projected population increase.
- Sixmilebridge and Bunratty - projected population increase in these settlements will be met by expansion of Shannon Schools.
- Athlunkard, Clonlara, Parteen, Ballycannon North (Meelick), Ardnacrusha, Cratloe and O'Briensbridge - projected population increase in these settlements will be met by schools in Limerick City

Service Towns

Ennistymon/Lahinch – The Department notes that construction is now underway for a new post primary school in Ennistymon which will amalgamate the existing three post-primary schools and welcomes the support for the delivery of the new post primary school (currently under construction) in the Draft Plan.

Kilrush (including Cappa Village and Pier) – The Department welcomes Objective OP10 in Volume 3d West Clare Municipal Plans concerning the development of a new school building.

Primary School Requirements

Considers that existing facilities in the following settlements could meet the projected population increase:

- Ennistymon/Lahinch, Kilrush/Cappa, Scarriff, Tuamgraney, Kilkee, Lisdoonvarna, Miltown Malbay, Newmarket-on-Fergus, Tulla - projected population increase will be met by existing schools in the respective settlement.
- Killaloe projected population increase will be met by schools in Killaloe and Ballina.

Post-Primary School Requirements

Considers that existing facilities in the following settlements could meet the projected population increase:

- Ennistymon/Lahinch - projected population increase will be met by new school currently under construction.
- Kilrush/Cappa - projected population increase will be met by existing schools in the

respective settlement.

- Scarriff/Tuamgraney - projected population increase will be met by school in Scarriff.
- Kilkee, Killaloe, Lisdoonvarna, Miltown Malbay, Newmarket-on-Fergus, Tulla - projected population increase will be met by existing schools in the respective settlement.

Large Villages (Tier 1 and Tier 2)

The Department notes that no other educational requirements have been identified at any other settlements in the county.

Chief Executive's Response

I wish to thank the Department of Education for their detailed submission which has looked at settlements throughout the County and assessed their future school place requirements arising from the increased population and whether this can be met in existing facilities or whether it will necessitate new facilities. I note the detail of the submission and set out below is my response to specific issues raised above.

Objectives on Community Infrastructure

Noted, text will be added to make reference to the Government's Guidelines on the use of school buildings outside of school hours.

GIS

The Council GIS system does have all schools across the county identified as well as the land use zoning.

Ennis

The proposed 'Mixed Use' zoning objective at the site of the Holy Family School in Ennis will not undermine the role of the school. Such mixed-use zoning would not affect the existing established use of the site for education or any future extension to the school. This plan takes a long-term view on the development of Ennis and its town centre. As a result, I do not consider that the zoning of the site should be changed.

Athlunkard

Noted, the post primary needs of Athlunkard are reliant on Limerick City. The population target for Athlunkard for this plan period is conservative until such time as infrastructure constraints in the area are resolved.

Parteen

C1 in Parteen is a greenfield site that is zoned to facilitate the potential re-location of the school as the existing school site MU1 is restricted in terms of potential to expand. Given the size of C1 it is considered it may also facilitate additional community facilities that would be complementary to a potential school.

Proposed South Clare/University of Limerick SDZ

Noted, should the SDZ receive designation, a detailed planning scheme will be prepared and this will address the overall needs of the area, along with the education needs at primary and post primary.

Shannon

The County Development Plan does not include a zoning map for Shannon as a Shannon Local Area Plan will be prepared on completion of the CDP process. The LAP will seek to ensure that there is sufficient zoned lands to provide for any requirement for the expansion of the post primary schools in Shannon.

Service Towns

Noted, no additional requirements are identified in Service Towns.

Chief Executive's Recommendation

The following amendment to be made to CDP 10.19, Dual Use Facilities.

Development Plan Objective: CDP 10.19 Dual Use Facilities

It is an objective of Clare County Council:
a) To encourage and promote the sharing of the use of school facilities with community groups where possible having regard to the "Government's guidelines on the use of School Buildings outside of School Hours", Department of Education and Skills.

b) To encourage the shared use of all community facilities for use by all groups in the Plan area.

Submission No: S2/010 –ESB	
Relevant Chapters / Topics	• **Infrastructure** • **Energy Network** • **Moneypoint**

Summary of Issues Raised in Submission

In the submission the vison included in Draft Plan (CDP) is broadly supported and it is requested that a number of observations regarding strategic issues are included in the final plan.

These observations include:

- ESB welcome support for energy utility providers to reinforce and strengthen existing utility infrastructure and transmission/distribution networks while facilitating areas designated under Natura 2000.
- Important role Moneypoint power station will play as a green energy hub in the future and need for the protection of this site.
- ESB welcome that the Planning Authority is committed to reviewing the Wind Energy Strategy once the new National Wind Energy Guidelines are issued and support the repowering of existing wind farms, which extends the planning lifetime of existing windfarm with no, or minimal, new development.
- Although the Draft Plan contains comprehensive development guidance for windfarms, ESB highlight that assessing the County Development Plans and Wind Energy Strategies of adjoining counties would strengthen the Plan, an opportunity exists to incorporate this into the planned review of the WES.
- ESB entered into a development partnership with Equinor, a global leader in the development of floating offshore wind. The partnership has identified a number of potential offshore wind development sites, along the Irish coast, and are working on developments off the coast of Clare. The total project capacity is to be between 1GW – 1.5GW, over an area of 180km2. This new industry provides opportunity for economic growth in the area.
- ESB have been investing in a pilot wave energy project off the coast of Clare. The ESB Westwave project is an exciting 5 MW wave energy project currently being developed near Doonbeg. This will be the first wave farm in Ireland with power expected to start generating soon.
- ESB wish to highlight that the overall guidance on solar developments could be strengthened with the provision for extension of duration of permission.
- Given that County Clare has access to Gas Network, ESB states the inclusion of the following text as a promotional objective for the development of a Renewable Enabling Plant will further assist in the transition to a low carbon economy. “It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.” ESB support this provision as it will be a necessary to connect additional non-renewable Plant to the grid.
- ESB welcomes initiatives relating to sustainable transport but notes the EU Energy Performance of Buildings Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure. To ensure that the Clare County Development Plan increases the usage of electric vehicles to the levels

required, ESB request that the standards as set out in Statutory Instrument No. 393/2021 – European Union (Energy Performance of Buildings) Regulations 2021 are stated.

- ESB also wish to highlight that, green renewable hydrogen enables the further electrification of transport, allowing the full decarbonisation of the transport

Chief Executive's Response

I thank ESB for the submission.

Moneypoint and its associated power lines are critical elements of the State's electricity generation and supply network. ESB's Brighter Future strategy proposes the transformation of the Moneypoint site from a fossil fuel burning power generation station into a green energy hub under the 'Green Atlantic' project. Clare County Council supports this project and is committed to safeguarding the future operations and proposed development at the site while at the same time ensuring that the environmental integrity of the adjacent Shannon Estuary is maintained.

Clare County Council will seek to work in collaboration with neighbouring councils and with the Southern Regional Assembly to establish and develop strategic partnerships and consistent approaches to renewable energy generation, such as those outlined in the CAP 21 Action 102, and address challenges posed by the transition to a low-carbon economy.

The duration of planning permission is normally guided by national guidance (e.g Development Management Guidelines). It is not advised for Clare to make a unilateral change to this approach, and it is recommended to follow a consistent approach as advised at national level, and it is intended that repowering of wind turbines will fall under the planning process conditions as outlined by the new Wind Energy Guidelines, when published.

Clare County Council recognise the important role that gas infrastructure must play in facilitating future renewable energy development by providing reserve fuel for heat and power facilities otherwise provided by renewable resources (see Draft CDP Section 11.8.4). It is noted that on 15th December 2021, the European Commission published its proposal for a recast of the Energy Performance of Buildings Directive (393/2021), in the framework of the Fit for 55% Package. The package of measures aims to put Europe on track for a 55% reduction in carbon emissions by 2030, and to achieve a net-zero building stock by 2050, whilst also tying in with the Renovation Wave Strategy.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 2023-2029 on the foot of this submission.

Submission No: S2/011 –An Taisce	
Relevant Chapters / Topics	• Climate Action • Economic Development – SDZ, Data Centres • Rural Development and Natural Resources – Agriculture, Bioenergy • Tourism • Sustainable Communities • Physical Infrastructure – Roads, Wastewater, Energy • Shannon Estuary • Marine and Coastal Zone Management • Biodiversity, Natural Heritage and Green Infrastructure • Architectural and Cultural Heritage • Towns and Villages • Implementation and Monitoring

Summary of Issues Raised in Submission

The submission relates to a number of areas including climate change and biodiversity, sustainable settlements, economic development, rural development and natural resources, renewable energy, tourism, sustainable transport and marine, coastal and island management as follows:

Climate Change

1. In the submission, the increased emphasis on climate mitigation and adaptation, the inclusion of Chapter 2 and the consideration in that chapter of the relationship between climate and many of the other key themes of the Draft Plan is welcomed.
2. Considers that several plan objectives are incompatible with the Draft Plan's broader climate action objectives and recommends that each chapter of the new Development Plan is directly assessed against the Plan's climate objectives and wider national and EU targets, particularly the obligations under the Climate Action and Low Carbon Development (Amendment) Act 2021.
3. that commitments be added to Chapter 10 (Sustainable Communities) to address the disproportionate impact of climate change on marginalised communities.
4. That each chapter contains a climate context section with climate-specific objectives relating to the theme of the chapter.
5. that the 'Just Transition' principle be integrated into the final Plan.
6. That the plan takes account of up-to-date climate projections with regard to increased coastal, fluvial and pluvial flood risk and that Objective CDP2.6b is amended to read:
   "To ensure that flood risk assessments include consideration of potential impacts of flooding arising from climate change including sea level rise and coastal erosion **as well increased pluvial and fluvial flooding from rainfall events.**"

Biodiversity Loss

Considers that the Draft Plan does not sufficiently address the biodiversity loss emergency and references the Living Planet Report including the decline in species population. Reference is also made to a more recent paper 'Underestimating the Challenges of Avoiding a Ghastly Future' and its coverage of the scale of the challenge posed by biodiversity loss, implications, and the lack of responses from policy makers.

The submission submits that the new Plan should address the biodiversity crisis in the same way as the climate crisis and while there are many robust objectives in the Draft Plan aimed at ecological protection, especially in Chapter 15, It is considered that the Draft Plan, as a whole, does not sufficiently considered the context or addresses the scale of the current biodiversity loss emergency.

Sustainable Settlement

The legacy of leapfrogging, low density development patterns and the need to provide a shift away from dispersed car dependent development patterns, and the need to provide alternatives to the car is referenced in the submission. Considers the Plan should be guided by social and physical infrastructure and land should not be zoned without the necessary physical infrastructure and engagement with the infrastructure providers. Considers infrastructure should be delivered in a timely realistic manner. The approach taken within the Draft Plan is welcomed in particular commitments such as compact growth, integrated land use and transport planning, walking/cycle connectivity and public transport, priorities brownfield/infill/underutilised sites and vacant/derelict dwellings, placemaking and strengthening of rural towns and villages. However, considers that policies directing residential development to existing settlements and the criteria for limiting one-off housing to those with a demonstrated need should be as robust as possible, full implemented and enforced. It is recommended that the Council make the seven location test standards for new housing in the National Spatial Strategy a mandatory requirement for new housing and strictly enforced.

Economic Development

In the submission, the objectives supporting remote working are welcomed and the following are recommended:

- All objectives relating to the expansion of capacity at Shannon Airport should be assessed against local, national and EU emissions reduction obligations.
- The impacts of proposed South Clare/University of Limerick Economic Strategic Development Zone on Limerick City and revitalisation of other town centres in the catchment is further evaluated.
- All new commercial and business developments should be required to apply sustainable transport principles, not just within the site but to the site.

Date Centres

In the submission it is considered that the development of a new data centre is contrary to the climate action objectives in Chapter 2 and is incompatible with the Climate Action and Low Carbon Development (Amendment) Act 2021. In this regard the following is recommended:

That Objective CDP6.27 for the development of a new data centre is removed or the following objectives are included:

- *Any new data centre development should only be considered if it is powered by one of the following:*
    - *A new, dedicated onsite supply of renewable energy;*
    - *A new offsite supply of renewable energy with a dedicated grid connection;*
    - *Or by matching its full annual energy consumption with a new commensurate or greater contribution to Ireland's renewable's supply developed prior to or in tandem with the data centre.*
- *Any new data centre proposal must fully comply with the requirements of the Environmental Impact Assessment Directive and assess the cumulative impacts of the energy demand and associated emissions in combination with the data centre sector as a whole.*
- *Any new data centre proposal must evaluate its energy demand in relation to rapidly increasing grid constraints.*

<u>Rural Development and Natural Resources</u>

Agriculture

In the submission, the impact of agricultural practices on water and air quality are noted and it is considered that stronger objectives are required to promote environmentally sustainable and economically viable agriculture while reflecting the scale of the changes needed in the sector to address these issues. Considers this should also be addressed in Chapter 2 on climate action and Chapter 15 on biodiversity.

Considers further objectives should be included to ensure that permission for agriculture developments is only granted when the impacts of a proposal on water, air, climate and biodiversity are evaluated and mitigated includes impacts beyond the red line including slurry spreading.

Notes that Objective CDP11.39 on the disposal of agricultural waste requires rigorous implementation and calls for compliance with Habitats, Birds, Water Framework and Nitrates Directives and with River Basin Management Plans and use of catchment sensitive farming practices.

Diversification

In the submission it is recommended that objectives specifically promoting the production of vegetables, grains, nuts, pulses, fruits, etc. are included.

Integration of European Strategies

The submission suggests that the policies, objectives and targets of the Farm to Fork Strategy and EU Biodiversity Strategy should be incorporated into the Draft Plan and recommends the following objective is included:

Clare County Council will implement the objectives and targets at county level of the EU 'A Farm to Fork strategy', published in May 2020. The Council will also implement the targets of the 14-point EU Nature Restoration Plan in the 'EU Biodiversity Strategy for 2030 - Bringing nature back into our lives'. Agricultural development proposals must demonstrate compliance with the targets and policies of both strategies.

Forestry

Welcomes Objective CDP8.10c) on the development of native woodlands and recommends that greater emphasis be placed on this over the planting of species such as sitka spruce, which create what are essentially ecological dead zones.

Bioenergy – Anaerobic Digestion

Requests that objectives relating to bioenergy (e.g. CDP2.19, 8.3iii, 8.11, etc.) are amended to specify that biogas development will only be supported where it can be demonstrated that the feedstock source is sustainable per the criteria above (critically, not requiring additional grass or energy crop production) and where the end product will not be mixed with fossil gas.

Renewable Energy

Welcomes the robust consideration of renewable energy development of various types and scales in the Draft Plan as well as the many policy objectives supporting and facilitating this.

Extractive Industry

Considers that Section 35 of the Planning and Development Act 2000 (as amended) regarding past failures to comply should be rigorously applied to proposals for continued or expanding quarrying operations and requests that Objective CDP8.14 is amended to require strict enforcement against unauthorised development and enforcement of conditions applied to permitted quarry development.

Tourism

In the submission, Objectives CDP9.3e) Integrated Tourism Products, CDP9.5c) Visitor Accommodation, CDP9.8 Educational Tourism and CDP9.17 Sustainable and Responsible Tourism are welcomed, and the following is recommended:

The inclusion of additional explicit objectives to:

- Increase the access to public transport, walking and cycling options from key tourist destinations and accommodation hubs;
- Increase car-free, long-stay trips; and
- Make driving routes like the Wild Atlantic Way and the Shannon Estuary Way less focused on private car use and more accessible for public transport, walking and cycling.

It is also requested that Objective CDP9.5a) is amended to read "… at appropriate locations throughout the County, **particularly in areas with existing services and infrastructure**" and that Objective CDP9.8d) is amended to specifically commit to avoiding conflicts with sensitive ecological sites and ensuring compliance with the Habitats and Birds Directives similar to CDP9.4c) and 9.13.

Physical Infrastructure, Environment and Energy

Sustainable Transport and Integration with Land Use Planning

Welcomes Objective CDP11.2 on achieving Smarter Travel targets, CDP8.6 on improving rural public transport, and CDP11.9 on the better integration of transport services. It is considered that robust targeted and timelined plans are needed to ensure the efficient implementation of these policies and the following is recommended:

- that specific modal shift targets for 2029 should be set including settlement-specific targets and overall county level targets.
- an explicit objective is included ensuring that sufficient public transport capacity as well as safe cycling and pedestrian infrastructure be provided prior to or in tandem with any new residential development.

Programme for Government

Considers that the Council needs to address the current unsustainability of transport in the county and the ongoing failures to achieve meaningful progress toward a modal shift away from private car use.

Road Investment

Considers transport policy and investment in Clare should be reprioritised away from road infrastructure in line with the Government commitment to a 2:1 ratio of expenditure between new public transport infrastructure and new roads.

Water Resources

Considers that the CDP should include a requirement for all development proposals to demonstrate full compliance with the WFD and Groundwater Directive.

Wastewater

Considers planning permission for developments that require additional public wastewater treatment capacity must be deemed premature until such capacity is in place. Furthermore, land should not be zoned if there is no plan in place to provide the necessary wastewater treatment capacity within the plan period.

Private Treatment Systems

Requests that an objective is included to promote changeover from septic tanks to public collection networks in all cases where this is feasible.

In addition, considers the CDP should ensure the adequate provision of serviced sites in close proximity to established water/wastewater infrastructure, where a connection to services can be readily facilitated, and where there is sufficient cumulative capacity within the wastewater treatment plant.

Impacts in Areas of Karst

Considers the CDP should contain specific objectives to protect groundwater in these areas against the risk of pollution from private wastewater treatment systems, agricultural and industrial runoff, siltation and other contamination during construction activities, etc.

Unassigned Waterbodies

Highlights the recent court ruling relating to treatment of unassigned waterbodies and assessment of proximate planning applications against WFD requirements. In this regard, considers the new CDP should take account of this ruling and its implications for granting planning permissions.

Energy – Fossil Fuels and Gas

In relation to objectives CDP8.13 Unconventional Gas Exploration and Extraction, 11.44 Energy Security, and 11.46 Gas Networks, it is considered that there is no capacity under national, EU and international climate policy for further fossil fuel exploration/extraction or further development of the gas network. In the submission it is recommended that the relevant objectives to further expand the gas network are removed.

Shannon Estuary

Considers all proposals and objectives for the Shannon Estuary should be subject to robust evaluation under the Habitats Directive.

Supports the rapid transition of the Moneypoint power station away from fossil fuel use and considers the CDP should include a requirement for a just transition plan for Moneypoint to ensure that this is accomplished equitably (see also Section 2.1.1 of this submission).

Marine, Coastal and Island Management

Considers a healthy ocean ecosystem is fundamental for the realisation of any economic or social benefits and considers objectives for the marine area should therefore directly address the trade-offs that may arise between economic interests and the pressing need to address declining marine biodiversity. Welcomes the objectives aimed at protecting the marine and coastal environments and recommends that an ecosystem approach be adopted in the CDP's marine related policy involving basing all decisions on the proper functioning of the ecosystems upon which human activities in the marine area depend.

Recommends that an objective is included to ensure that any economic activity which utilises the marine area must comply with the Marine Strategy Framework Directive and achieve the legally binding target for reaching Good Environmental Status in coastal and marine waters.

Marine Renewable Energy and Biodiversity

The importance of the offshore wind energy generation is noted. It is also suggested that a policy is included requiring the use of a seabird sensitivity map in the early stages of planning, to assess the risk posed by marine renewable energy developments, and to fully comply with our legal obligations to protect birds and their habitats. It is further suggested that objective CDP13.5 be amended to explicitly include a requirement for compliance with Environmental Impact Assessment, Birds and Habitats Directives obligations.

Fishing and Aquaculture

Notes while CDP13.6a) states the intention to facilitate conservation, it is framed in terms of need for economic growth, therefore it is recommended that that an explicit commitment to ecological protection and an ecosystems approach is required in the objectives relating to aquaculture and fisheries (CDP13.6 - 13.8).

Coastal Erosion and Flooding

It is recommended that an additional objective is included under Objective CDP13.11 that where flood mitigation measures are necessary, soft engineering solutions should preferentially be employed over hard engineering solutions where possible.

Coastal Squeeze, Beaches and Sand Dunes

In the submission, the discussion of coastal squeeze in Section 13.15 is welcomed as well as CDP13.13 on the protection of beach and dune areas. It is recommended that the objective (CDP13.12) is strengthening to state that coastal squeeze should be avoided wherever possible.

Biodiversity, Natural Heritage and Green Infrastructure

Biodiversity

Welcomes the suite of policies aimed at biodiversity protection and enhancement, including environmentally designated and other protected sites and notes that the implementation and enforcement of these policies must be upheld in the planning process at all levels. In this regard, it is considered that the Draft Plan generally lacks consideration of the urgency required in addressing the biodiversity loss crisis.

Habitats Directive Requirements

Highlight the strict legal requirements of the Habitat's Directive with regard to the granting of planning permission where the proposal could impact Habitats Natura 2000 sites.

EU Biodiversity Strategy

In the submission it is recommended that the implementation of the 14 points (outlined below) in the EU Biodiversity Strategy 2030 are included as a specific biodiversity objective:

1. *Legally-binding EU nature restoration targets will be proposed in 2021, subject to an environmental impact assessment. By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30% reach favourable conservation status or at least show a positive trend.*
2. *The decline in pollinators is reversed.*
3. *The risk and use of chemical pesticides is reduced by 50% and the use of more hazardous pesticides is reduced by 50%.*
4. *At least 10% of agricultural area is under high-diversity landscape features.*
5. *At least 25% of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.*
6. *Three billion new trees are planted in the EU, in full respect of ecological principles.*
7. *Significant progress has been made in the remediation of contaminated soil sites.*
8. *At least 25,000 km of free-flowing rivers are restored.*
9. *There is a 50% reduction in the number of Red List species threatened by invasive alien species.*
10. *The losses of nutrients from fertilisers are reduced by 50%, resulting in the reduction of the use of fertilisers by at least 20%.*
11. *Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.*
12. *No chemical pesticides are used in sensitive areas such as EU urban green areas.*
13. *The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.*
14. *The by-catch of species is eliminated or reduced to a level that allows species recovery and conservation.*

Peatlands

Welcomes the commitments in Chapter 15 to protecting and enhancing peatlands and notes that any provision for development on peatlands must be subject to full sustainability assessments, particularly in relation to carbon and biodiversity. In this regard, an additional policy objective should be included to state: The extraction and use of peat for horticulture is not to be permitted.

Green Infrastructure and Urban Greening

Welcomes the Draft Plan's approach to green infrastructure and the recognition of the benefits to both environment and communities. Notes the inclusion of Objective CDP15.30 for the development of green infrastructure plans for Ennis and Kilrush and recommends that these plans incorporate recommendations of the EU Biodiversity Strategy.

In addition, encourages the development of green infrastructure/urban greening plans in other towns throughout Clare.

Architectural, Archaeological and Cultural Heritage

Considers robust implementation and enforcement provisions should be included in the Plan to ensure the effective promotion of the Architectural Heritage provisions of Planning and Development Act 2000 (as amended) for the protection of Clare's built heritage.

Considers Chapter 16 should be amended to include policies for monitoring buildings at risk and using the provisions of Section 59 of the Planning Act to serve notices of endangerment to negligent property owners.

Refers to Section 2.6.5 which refers to the risk climate changes poses to cultural heritage assets and welcomes the associated objective to undertake a risk assessment.

Towns and Villages

Town Centres

Welcomes the objectives that promote town centre vitality and regeneration e.g. CDP5.3 and CDP 17.1 etc. in line with the 2020 Programme for Government and Town Centre First policy.

Re-Use of Existing Buildings

Notes that projected energy savings of new build will never overcome the massive environmental footprint of demolition and redevelopment and considers the need to reuse, rather than redevelopment, existing buildings of all periods as a priority should be emphasised.

Strategic Environmental Assessment

Notes the Councils legal obligation in relation to the SEA process is robust, effective, and considers the Council should ensure that monitoring of significant environmental effects is carried out and that any unforeseen adverse impacts that arise are remediated.

Implementation and Monitoring

Notes the importance of robust targets, actions and measures to achieve the tangible implementation of the Plan's objectives and policies, and considers the success or otherwise of the Plan can only be judged against quantifiable and implementable criteria which are subject to ongoing monitoring.

Chief Executive's Response

I wish to thank An Taisce for the submission to the Draft Plan and I acknowledge the importance of the concerns raised.

Climate Change

1. I welcome the positive comments in relation to emphasis on climate mitigation and adaptation, the inclusion of Chapter 2 and the considerations of the relationship between climate and other key themes.
2. I note the points made in the submission and I am satisfied that the general objectives contained in the Draft Plan are compatible with broader climate action objectives and that the principles of climate change have been incorporated into and are intrinsic within each chapter. The Draft Plan is in accordance with relevant legislation. It should be noted that Section 2.3 of the Draft CDP outlines the statutory and planning context which sets the climate action parameters and requirements that Clare County Council must adhere to, and the Council is committed to the implementation of those actions. Furthermore, Clare County Council is a signatory to the Climate Action Charter for Local Authorities, which sets out a common understanding in relation to climate change, acknowledgement of the need for a whole of government approach to address climate change, and acknowledges specific local government supports of central government in relation to climate change.
3. I am satisfied that the Draft Plan contains appropriate policies and objectives that express the Council's commitment to Climate Justice and addressing the disproportionate impact of climate change on marginalised communities. These includes the provision of affordable housing (Chapter 5 & Volume 8 Clare Housing Strategy), renewable energy (Chapter 11 & Volume 5 Clare Renewable Energy Strategy & Volume 6 Clare Wind Energy Strategy), climate adaptation/mitigation measures (Chapter 2) and apprenticeships (Section 10.17.3 Third Level and Higher Education). The Council also supports the retrofitting of homes in the County, including Council housing. The parameters set out in the Draft Plan in relation to climate change which applies to all members of the community and wider public. It does not distinguish social division.
4. While Chapter 2 specifically addresses Climate Change, the principles of climate change have been incorporated into and are intrinsic within each chapter. Therefore, I am satisfied that a climate context section is not required in each individual chapter.
5. Clare County Council acknowledges the requirement for the evolution towards a carbon-neutral society to be a just transition for everyone. The Draft Plan contains policies and objectives that promote Just Transition principles as appropriate. I do not consider it is necessary to repeat policy objectives already applicable in higher order plans. However, I consider specific reference to Just Transition should be included in the Plan.
6. I am satisfied that the Draft Plan has been prepared using all available data, including that relating to coastal, fluvial and pluvial flood risk, through the preparation of the Strategic Flood Risk Assessment (SFRA) for the Draft Plan which has informed the settlement zoning maps and statements included within Volume 3 of the Draft Plan. In addition, I consider it is not necessary to amend Objective CDP2.6b) as requested.

Biodiversity Loss

I note observations made in the submission in relation to the current biodiversity loss emergency and while I am satisfied that the policies and objectives of the Draft Plan appropriately address the issue of biodiversity loss, I consider further text should be included in the Plan to reflect the scale of the emergency.

Sustainable Settlement

There is a strong emphasis in the Draft Plan on creating more compact settlements where walking and cycling is a viable alternative to the private car. The support by an Taisce for commitments in the Draft Plan such as promoting compact growth, directing development to existing villages and settlement clusters, creating vibrant communities in both urban and rural areas, directing development to infill sites, brownfield sites, vacant/derelict sites, etc. is welcomed. With regard to the Seven Tests for Housing Locations outlined in the National Spatial Strategy 2002, this Strategy has since been replaced by the National Planning Framework. I am satisfied that the Draft Plan contains appropriate measures with respect to the location and design of new residential development as well as policies relating to associated areas of sustainable transport and Smarter Travel.

Economic Development

In the submission, the objectives supporting remote working are welcomed and the following are recommended:

1. Any future expansion of or new facilities at Shannon Airport are required to be assessed against relevant local, national and EU Policy and legislation.
2. The South Clare/University of Limerick Economic Strategic Development Zone has been subject to both an economic analysis and screening for SEA as part of the application for designation process. As part of this, an assessment of alternatives was undertaken to inform the SEA. Of the five alternatives selected, Limerick City Centre was critically evaluated as one. It was concluded that the sites available within this alternative were insufficient to accommodate the area required to satisfy such a strategic designation. Within the urban centre of Limerick, retail and hospitality is at its core. This will not form a key component of the SDZ. The retail and hospitability provided for will ultimately serve the residents, students, employees etc of the new academies of learning. The SDZ will not become a destination in its own right as Limerick City Centre is and therefore will not detract from the urban centre. The SDZ will not become a catchment for other towns and villages as it will not provide the services required to meet their needs.
3. The submission regarding Sustainable Design and Working Environments seeks that commercial and business development apply sustainable transport principles concerning travels to and from the site. Mobility Management initiatives are a requirement of new large-scale developments (>75 employees) whereby the preparation and implementation of a Mobility Management Plan to support the use of sustainable modes of transport. This is set out under Objective CDP6.13 'High Quality Development'.

   At a broader level, Objective CDP 2.1 concerns Climate Action and according to the text immediately preceding CDP 2.1, the Council seeks to "support a reduction in greenhouse gas emissions through actions such as the promotion of climate change awareness and behavioural change". The Council therefore sees merit in behavioural change initiatives

such as Mobility Management in addressing Climate Change, in the context of travel and mobility (among other areas) and the Council is satisfied that comprehensive policy support is provided in the Draft CDP for behavioural change measures in land use and transport through the policies and objectives contained in particular within:

- Chapter 2 Climate Action;
- Chapter 10 Sustainable Communities;
- Chapter 11 Physical Infrastructure, Environment and Energy;
- Volume 3 Settlement Plans.

Data Centres

Under CAP 21, the government will review the policy context for Large Energy Users (including Data Centres), ensuring alignment of enterprise policy and wider regulatory environment with electricity emission targets and security of supply. Further regulatory levers will also be considered to manage demand from large energy users, such as data centres, in the context of emissions and future network needs. In the absence of an update following this review, normal planning consideration for Data Centres will apply.

In relation to specific concerns raised in the submission, data centres have recently become a topic of national concern due to their energy consumption and strain on the national electricity operator, Eirgrid. Data centres are dependent on a number of infrastructural requirements for them to function which include uninterrupted power supplies, ventilation, cooling systems, and network connectivity. With data centres consuming significant amounts of energy to function, they have been criticised for having a negative impact on the environment. Ireland currently has approximately 70 operational data centres. The centres are responsible for 1.58 per cent of Ireland's carbon emissions. Due to their reliance on the national electricity grid, the facilities are mostly powered by gas. There is one site identified in County Clare for the locating of a data centre which is at ENT3 just outside Ennis. The key source of emissions from these facilities arising from the necessary cooling system. From a climate perspective, the need for energy and cooling systems are not problems in their own right, it is the inefficiency of these systems and the underutilisation of the heat removed by the cooling system. I therefore consider that Objective CDP6.27 should be amended to ensure the inefficiencies in data centre energy and cooling systems are addressed in any proposal on the site.

In addition, I consider that Volume 3(a) Section 2.14 should be amended to include for a Climate Impact Assessment which would ensure any applications for Data Centres within County Clare address the impact which these facilities can have on achieving our Climate Change targets in terms of emissions and energy demand.

Rural Development and Natural Resources

Agriculture

I note the comments made in relation to ensuring rigorous implementation of Objective CDP11.39 and compliance with EU Directives, River Basin Management Plans and use of catchment sensitive farming practices. The Draft Plan recognises the challenges facing the agricultural industry and the requirements to adapt and change farming practices to deal with the implications of climate change while continuing to form a key part of the rural economy. In this regard, I am satisfied that

there is robust policy support in the Draft Plan to address the impact of agriculture in terms of water, air and biodiversity.

Diversification

It is the role of the County Development Plan to support and facilitate diversification, not to dictate crop type.

Integration of European Strategies

The Draft Plan includes Objective CDP15.1 which expresses the Council's commitment to implement the National Biodiversity Action Plan 2017-2021, the All Ireland Pollinator Plan 2021-2025, the County Clare Heritage Plan 2017-2023 and the County Clare Biodiversity Plan 2017-2023, or any subsequent plans, in partnership with all relevant stakeholders. Within the EU Biodiversity Strategy, it sets out six targets with associated specific initiatives. The National Biodiversity Action Plan is the main vehicle for meeting commitments under the Convention on Biological Diversity (CBD) and EU Biodiversity Strategy. I consider it is appropriate to reference the EU "A Farm to Fork Strategy" 2020 within this objective.

Forestry

As outlined in the Draft CDP Forestry plays an important role in terms of rural development and diversification in County Clare and has the potential to provide further economic, environmental, and social gains. The Council will work with the relevant stakeholders to accommodate sustainable native broadleaf and coniferous afforestation in the County. In this regard Clare County Council is a consultative body in relation to applications to the Forestry Service for initial afforestation and submits observations to the Forestry Service on such applications, as appropriate. I am satisfied that Objective CDP8.10 sufficiently covers the concerns raised and does not promote the afforestation of areas of the county with Sitka Spruce but encourages the use of native woodlands on appropriate soils.

Bioenergy – Anaerobic Digestion

The expansion of the fossil gas network does not fall within the remit of the Draft Plan. However, essential maintenance, upgrading and in some cases, expansion, of the electricity and gas network grid infrastructure will likely be required to ensure energy security in support of a high variable renewable electricity system, and to integrate renewable energy sources. This will allow for the creation of a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows. The climate mitigation related policies set out in the Draft Plan are sufficient without the need for additional fossil fuel related infrastructure Policy Objectives.

In respect of issues raised in relation to Anaerobic Digestion, the Draft Plan recognises the range of new and developing technologies that can contribute to minimizing greenhouse gas emissions, providing a secure and stable energy supply and securing a greater proportion of our energy from renewable sources. The Council supports the concept of generating renewable energy at a local level and recognises the advantages and supports anaerobic digestion and Bioenergy.

Renewable Energy

Welcomes the robust consideration of renewable energy development of various types and scales in the Draft Plan as well as the many policy objectives supporting and facilitating this.

Extractive Industry

With regard to Enforcement, there are a number of regulatory provisions set out within the Planning and Development Act 2000(as amended).

Tourism

The Clare Tourism Strategy, Cliffs of Moher Strategy are all looking to address longer stays within the immediate area and more over nights in order to address the high-volume car trips and drive-through tourism. In addition, the Draft CDP contains significant objectives in relation to the promotion of Greenways and Blueways.

I consider that the requested amendment to Objective CDP 9.5a) is acceptable and I consider Objective CDP 9.8 should be amended to ensure that development of new or enhanced tourism infrastructure and facilities include an assessment of the environmental sensitivities of the area including and Environmental Impact Assessment (EIA); Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) if required in order to avoid adverse impacts on the receiving environment.

Physical Infrastructure, Environment and Energy

Sustainable Transport and Integration with Land Use Planning

The Draft CDP sets out a policy emphasis towards compact growth and consolidating town and villages in line with national and regional policy. The Strategic Environmental Assessment (SEA) in Volume 10(b)(i) includes the following Strategic Environmental Objectives to address Climate Change:

- CC1 – Reduce the need to travel/increase use of public transportation and achieve modal shift in transport across the county;
- CC2 – Decrease the usage of fossil fuels and increase both renewable resource usage and protection together with a move towards more low carbon energy sources.

Objectives CC1 and CC2, in combination, are given effect in the Draft Development Plan in Chapter 2 Climate Action, under Objective CDP2.15 as follows:

> a) To seek initiatives that will achieve the decarbonisation of the transport sector, moving to the use of clean generated electricity bio-gas hydrogen and other non-fossil fuels for private and public transportation and the provision of clean energy and low carbon fuelling stations by 2030;
>
> b) To reduce reliance on private cars and achieve modal shift to sustainable transportation in conjunction with policies to achieve compact growth and reduce congestion.
>
> c) To seek the development of clean energy and lower carbon fuelling and electric vehicle charging stations and infrastructure at appropriate locations in the County which take into consideration electric, hydrogen, CNG/biogas inter-alia; and
>
> d) To support actions to transition the movement of freight, ports and airports to a low carbon future.

Therefore, I am satisfied that the Draft Plan contains appropriate policies and objectives which support sustainable transport principles and modal shift.

Programme for Government

Please refer to my response to Sustainable Transport and Integration with Land Use Planning above.

Road Investment

I am satisfied that the matter of sustainable transport is sufficiently addressed and embedded within the Draft Plan.

Water Resources

Objective CDP 3.1 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment in Chapter 3 of the Draft Plan ensures that all development complies with the WFD and Groundwater Directive.

Wastewater

The Council regularly collaborates with Irish Water on matters pertaining to Water supply, Wastewater Treatment and associated infrastructure such as the Drainage Area Plan for Galway including in the preparation of the Draft Plan. Chapter 3 Core Strategy, Chapter 4 Urban and Rural Settlement Strategy and Volume 8 Housing Strategy of Draft Plan identifies the Core Strategy Table with a settlement hierarchy and quantum of lands required for residential development. All of these lands are serviced or serviceable by associated infrastructure including wastewater.

Private Treatment Systems

The suite of policies and objectives contained within the Draft Plan and the EPA Guidance are sufficient to encourage changeover from septic tanks to public collection networks, including Objective CDP11.32 Wastewater Treatment and Disposal Proliferation of Septic Tanks i)To encourage and support a changeover from septic tanks/private wastewater treatment plants to public collection networks wherever feasible, subject to connection agreements with Irish Water and to ensure that any future development connects to the public wastewater infrastructure where it is available. The Draft Plan is in accordance with relevant legislation.

Objective CDP11.34 Rural Wastewater Treatment Programmes in Chapter 11 To support the servicing of rural villages (serviced sites) to provide an alternative to one-off housing in the countryside expresses the Council's commitment in relation to the provision of serviced sites in appropriate locations.

Impacts in Areas of Karst

All sites which are zoned within the Draft Clare County Development Plan are screened for the presence of Karst and either avoided or appropriate measures provided.

Unassigned Waterbodies

I note the point made in relation to the recent court ruling regarding unassigned waterbodies and I am satisfied that the new Plan is in accordance with relevant legislation.

Energy – Fossil Fuels and Gas

The expansion of the fossil gas network does not fall within the remit of the County Development Plan. The climate mitigation related policies and objectives set out in the Draft Plan are sufficient to address fossil fuel related infrastructure.

Shannon Estuary

I am satisfied that the policies and objectives contained in the Draft Plan, including Objective 3.1 and Chapter 12 Shannon Estuary, will ensure compliance with the Habitats Directive.

In relation to Moneypoint, please note my response for item no 5 under 'Climate Change' above.

Marine, Coastal and Island Management

Considers a healthy ocean ecosystem is fundamental for the realisation of any economic or social benefits and considers objectives for the marine area should therefore directly address the trade-offs that may arise between economic interests and the pressing need to address declining marine biodiversity. Welcomes the objectives aimed at protecting the marine and coastal environments and recommend that an ecosystem approach be adopted in the CDP's marine related policy involving basing all decisions on the proper functioning of the ecosystems upon which human activities in the marine area depend.

In relation to the Marine Strategy Framework Directive, 13.5 Maritime Spatial Planning, Chapter 13 of Volume contains reference to this. All economic activity which utilises the marine area must comply with the Marine Strategy Framework Directive therefore I do not consider an additional objective is required.

Marine Renewable Energy and Biodiversity

The importance of the offshore wind energy generation is noted. It is also suggested that a policy is included requiring the use of a seabird sensitivity map in the early stages of planning, to assess the risk posed by marine renewable energy developments, and to fully comply with our legal obligations to protect birds and their habitats. It is further suggested that objective CDP13.5 be amended to explicitly include a requirement for compliance with Environmental Impact Assessment, Birds and Habitats Directives obligations.

The role and importance of the Marine Sector and the Marine Environment is clearly and adequately covered in Chapter 13 of the Draft Plan. Objective CDP13.2 Management Structures in Section 13.4 Management of the Coastal Zone supports the implementation of the Marine Planning and Development Management (MPDM) Bill when enacted and the Maritime Area Regulatory Authority (MARA) in the consenting and licensing of the maritime area. At present the Council does not have a consenting remit for the Offshore Area.

National, Regional and County level climate change policies and objectives in Ireland are informed by, and in accordance with related international and EU level policies which are outlined in the Draft CDP Section 2.3.1 and Objective CDP3.1 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment relates to all developments the County whether explicitly stated or not. Therefore, I do not consider there is a need to amend Objective CDP13.5 as suggested.

Fishing and Aquaculture

As noted above, National, Regional and County level climate change policies and objectives in Ireland are informed by, and in accordance with related international and EU level policies which are outlined in the Draft CDP section 2.3.1. Therefore, I do not consider it necessary to include an explicit commitment to ecological protection and an ecosystems approach aquaculture and fisheries objectives.

Coastal Erosion and Flooding

As noted above, National, Regional and County level climate change policies and objectives in Ireland are informed by, and in accordance with related international and EU level policies which are outlined in the Draft CDP section 2.3.1. Therefore, I do not consider it necessary to include an explicit commitment to ecological protection and an ecosystems approach aquaculture and fisheries objectives.

It is recommended that an additional objective is included under Objective CDP13.11 that where flood mitigation measures are necessary, soft engineering solutions should preferentially be employed over hard engineering solutions where possible.

Coastal Squeeze, Beaches and Sand Dunes

I consider the avoidance of coastal squeeze wherever possible is inherent of CDP Objective 13.11.

Biodiversity, Natural Heritage and Green Infrastructure

Biodiversity

I note observations made in the submission in relation to the current biodiversity loss emergency and while I am satisfied that the policies and objectives of the Draft Plan appropriately address the issue of biodiversity loss I consider further text should be included in the Plan to more appropriately reflect the scale of the emergency and identify potential threats to Biodiversity.

Habitats Directive Requirements

Highlight the strict legal requirements of the Habitats Directive with regard to the granting of planning permission where the proposal could impact Natura 2000 sites.

EU Biodiversity Strategy

The Draft Plan includes objective CDP 15.1 to implement the National Biodiversity Action Plan 2017-2021, the All Ireland Pollinator Plan 2021-2025, the County Clare Heritage Plan 2017-2023 and the County Clare Biodiversity Plan 2017-2023, or any subsequent plans, in partnership with all relevant stakeholders.

Within the EU Biodiversity Strategy, it sets out six targets with associated specific initiatives. The National Biodiversity Action Plan is the main vehicle for meeting commitments under the Convention on Biological Diversity (CBD) and EU Biodiversity Strategy. Therefore, through the inclusion in Objective CDP 15.1 of the commitment to implement the National Biodiversity Action Plan which takes account of the EU Biodiversity Strategy we are inherently ensuring these targets are also be met.

Peatlands

I am satisfied that the policies and objectives within the Draft Plan appropriately address the protection of peatlands in the County.

Green Infrastructure and Urban Greening

I note the comments made in relation to biodiversity and Green Infrastructure and the delivery of green infrastructure is supported within the Draft Plan. The Ennis and Kilrush green infrastructure plans are separate projects to the Draft Plan and their rollout and delivery does not fall within the remit of the Draft County Development Plan. I consider it is appropriate to include reference to the Council's commitment to implement the recommendations as contained within

the EU Biodiversity Strategy with respect to Green Infrastructure.

Architectural, Archaeological and Cultural Heritage

I welcome the positive comments in the submission and in relation to the requests outlined in the submission, I am satisfied that the commentary and supporting policy and objectives of Draft Plan relating to the built heritage robustly support and promote Architectural Heritage in the County including both Architectural Conservation Areas and Protected Structures. In this regard, Architectural and Cultural Heritage have been a dedicated chapter in Draft Plan in recognition of the county's architectural heritage as an irreplaceable resource and valuable expression of our past, and whose sustainable appropriate maintenance and reuse has economic, social and environmental benefits.

Monitoring Buildings at Risk, the Buildings at Risk Register and the service of Section 59 Notices are conducted by the Council, in accordance with statutory requirements.

Towns and Villages

Town Centres

I welcome the positive comments in the submission and in relation to CDP5.3 and CDP 17.1 etc. to promote town centre vitality and regeneration in line with the 2020 Programme for Government and Town Centre First policy.

Re-Use of Existing Buildings

The comments relating to new building and the reuse of existing buildings of all periods as a priority is noted.

Strategic Environmental Assessment

Chapter 10 of the SEA Environmental Report clearly outlines the requirements in terms of Article 10 of the SEA Directive. Table 10.1 sets out the Strategic Environmental Objectives, Targets and Indicators in terms of Monitoring with a specific column relating to remedial action which will be implemented should unforeseen adverse effects occur.

Implementation and Monitoring

The comments relating to monitoring are noted.

Chief Executive's Recommendation

I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029:

Under 'EU Green Deal (2020)' in Section 2.3.2 European Context, Chapter 2 of Volume 1 – include additional paragraph to read:

The Just Transition approach, which was included in Ireland's Climate Law enacted in 2021, emphasises a coordinated, long-term, and multi-pronged response involving social partners, industry, and Government. In the context of the implementation of climate change response measures in meeting emissions targets and adapting to the negative impacts of climate change, the just transition approach aims to ensure the creation of decent work, greener quality jobs, improving quality of life and better place making. It also aims to ensure that the opportunities

associated with moving to a zero-carbon economy are maximised, while minimising negative environmental and socio-economic impacts. Finally in terms of equality, the just transition approach is based on fairness, equality and inclusion, and provides a mechanism by which nobody gets left behind.

Under the first paragraph in Section 15.2.1 Biodiversity and Climate Change, Chapter 15 of Volume 1 – include additional text as follows:

The Intergovernmental Panel on Biodiversity and Ecosystem Service (IPBES) has published its global assessment on the state of the world's biodiversity and ecosystem services. Ireland officially declared a climate and biodiversity emergency on May 9 2019, becoming the second country after the UK to do so.

The report shows that nature is declining globally at rates unprecedented in human history and the rate of species extinctions is accelerating, with grave impacts on people around the world now likely. The health of ecosystems on which we and all other species depend is deteriorating more rapidly than ever. We are eroding the very foundations of our and future generation's economies, livelihoods, food security, health, and quality of life worldwide.

Current negative trends in biodiversity and ecosystems are undermining progress towards 80% of the assessed targets of the Sustainable Development Goals, related to poverty, hunger, health, water, cities, climate, oceans, and land. Loss of biodiversity is shown to be not only an environmental issue, but also a developmental, economic, security, social and moral issue as well. The Report also stresses that it is not too late to make a difference, but only if we start now at every level from local to global. The report concludes that "Through transformative change, nature can still be conserved, restored and used sustainably – this is also key to meeting most other global goals. By transformative change, the report means a fundamental, system-wide reorganization across technological, economic and social factors, including paradigms, goals and values."

Ireland's National Biodiversity Plan 2017-2023 will improve the governance of biodiversity in Ireland so that we can better respond to the biodiversity crisis. This means ensuring a 'whole of government' and a 'whole of society' approach to this crisis, and properly recognising biodiversity's contributions to people, the economy and society. The Plan will also address the connections between biodiversity and climate change, and the need to enhance the evidence base for biodiversity conservation policy and practice. The final version of the Plan will be published in early 2023, to allow the recommendations of the ongoing Citizens Assembly on Biodiversity to also be incorporated. The development of the plan follows increased resourcing to the National Parks and Wildlife Services with a 64% budget increase since 2020 and an independent review of the NPWS published in May 2022, leading to a fully-funded strategic action plan to transform the organisation and better enable it to deliver positive outcomes for nature.

Threats to Biodiversity
Biodiversity is undergoing major decline worldwide, to the extent that scientists refer to this age as the 'sixth mass extinction'. Causes of biodiversity loss include habitat loss, climate change, pollution, pesticide/herbicide usage and the spread of invasive species. Many of these issues are related to increased industrialization and intensification of agriculture.

A growing number of studies indicate that human-induced stressors such as habitat loss and fragmentation, pollution and climate change are seriously reducing the abundance, diversity and biomass of insects and other invertebrate on a global scale. The exact mechanism of such declines is poorly understood, but there is a strong scientific consensus that the decline if insects (and other invertebrates) is a very real and serious threat to ecosystems and to humanity. Therefore, we must act urgently to address this decline. Recently, a consortium of international scientists proposed a global 'roadmap' for insect recovery, which entails the immediate implementation of several 'no regret' measures to help slow or stop insect declines, such as habitat protection and creation, phasing out pesticide use and reducing light, water and noise pollution.

Objective CDP6.27 in Section 6.28 Data Centres, Chapter 6, Volume 1– amend objective to read:

CDP6.27

It is an objective of Clare County Council: To facilitate and support the development of a data centre on the Enterprise zoned lands (ENT 3) at Toureen Ennis subject to normal planning considerations and the implementation of the findings of the SEA and AA associated with this Plan. Any planning application for this site must include an analysis of the impacts from Green House Gas (GHG) Emissions associated with both the energy and cooling systems on the environment in the context of Climate Change and our commitment in CAP 2021 to achieve a reduction of 51% in GHG emissions by 2030.

Section 2.14 Technical Guidance – Transformational and Opportunity Sites, in Volume 3(a) – include additional paragraph to read:

Any planning application for a Data Centre within County Clare shall be accompanied by a Climate Impact Assessment to ensure that any impact that such a facility may have on the achievement of Climate Change targets, in terms of emissions and energy demand, is appropriately addressed.

Objective CDP15.1in Section 15.2.1 Biodiversity and Climate Change, Chapter 15, Volume 1 – amend point a) to read:

a) To implement the National Biodiversity Action Plan 2017- 2021, the All Ireland Pollinator Plan 2021-2025, the EU A Farm to Fork Strategy 2020, the County Clare Heritage Plan 2017-2023 and the County Clare Biodiversity Plan 2017-2023, or any subsequent plans, in partnership with all relevant stakeholders;

Objective CDP 9.5a) in Section 9.2.4 Visitor Accommodation, Chapter 9, Volume 1 – amend point a) to read:

a) To promote, encourage and facilitate the provision of new visitor accommodation and the expansion/upgrade of existing hotels, guesthouses, B&Bs and other tourist accommodation at appropriate locations throughout the County at appropriate locations throughout the County, particularly in areas with existing services and infrastructure.

Objective CDP 9.8 in Section 9.2.9 Activity and Adventure Tourism, Chapter 9, Volume 1 – include an additional point f) to read:

f) To ensure that development of new or enhanced tourism infrastructure and facilities includes an assessment of the environmental sensitivities of the area including and Environmental Impact Assessment (EIA); Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) if required in order to avoid adverse impacts on the receiving environment.

Objective CDP 15.30 Green Infrastructure and Climate Change in 15.3 Green Infrastructure and

Climate Change, Chapter 15, Volume 1 – include an additional point as follows to read:

It is an objective of Clare County Council:

a) To work to create an integrated and coherent green infrastructure network to enhance biodiversity and quality of life, to facilitate the movement of wildlife, to connect areas of high conservation value such as woodlands, hedgerows, earth banks, watercourses and wetlands, and to provide sustainable water management and a green

setting for urban areas;

b) To promote and facilitate the on-going development and improvement of green infrastructure, green corridors and ecosystem services in the Plan area, including green networks, green amenities and linked green corridors which ensure the provisions of recreational amenities, natural areas for the growth of wildlife and biodiversity, and a network of infrastructure which results in a better quality of life for visitors and inhabitants alike;

c) To implement the adopted Green Infrastructure Plan for Shannon Town and its environs and any subsequent plan;

d) To prepare a green infrastructure plan for Ennis and Kilrush during the lifetime of this Plan;

e) To work with community groups to access funding for appropriate and beneficial green infrastructure projects including parks, woodlands, sports facilities, green areas, playground/play facilities, river corridors, walkways, cemeteries, churchyards, utility grounds, paths, seating and amenities;

f) To require new amenity and/or recreational developments under the heading of green infrastructure to have regard to the recommendations as contained within the EU Biodiversity Strategy in the development of Green Infrastructure.

g)~~f)~~ To require the preparation and assessment of all planning applications associated with amenity and/or recreational uses under the heading of green infrastructure to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report contained in Volume 10 of this Plan;

h)~~g)~~ To require projects to be fully informed by ecological and environmental constraints at the earliest stage of project planning and that any necessary assessment be undertaken, including assessments of disturbance to species, where required; and

i)~~h)~~ To ensure compliance with all relevant legislation as outlined in Objective CDP3.1 commitment to implement the recommendations as contained within the EU Biodiversity Strategy with respect to Green Infrastructure.

Submission No: S2/012 –Dept of Agriculture, Food & Marine	
Relevant Chapters / Topics	• **Commercial Sea Fisheries** • **Offshore Wind**

Summary of Issues Raised in Submission

The submission relates to commercial sea-fisheries.

- Notes that the Draft Plan recognises sustainable commercial sea-fisheries as an important industry to be supported.
- Considers the evaluation of potential impacts needs consideration as part of any planning process and during development plan process.
- It is imperative that engagement be sought at an early stage to discuss any changes that may affect them.
- The Draft Plan identifies overfishing as being a problem in marine environment.
- It should be noted that the CFP is the mechanism by which EU fisheries are managed and also provides that fishing activities are environmentally sustainable in long term.
- Notes that the Draft Plan supports construction of offshore windfarms and in the event that these are proposed, the evaluation and consideration of any negative impacts on fisheries should be given consideration and stakeholders are consulted at an early stage.
- Volume 1 refers to the Department of the Marine and to note there is no such Department.
- Commercial sea-fishing comes under the remit of the Department of Agriculture, Food and the Marine.

Chief Executive's Response

I wish to thank the Department of Agriculture, Food and the Marine for the submission and I wish to respond as follows.

Clare County Council recognises the importance the Commercial Sea Fishing industry plays in our rural coastal communities in particular in terms of the economic importance of the fisheries exports which take place. The Draft County Development Plan will ensure that not only the pre-existing commercial sea fisheries are protected but also expanded where possible, due to the inclusion of the following policy objectives:

- CDP Objective 12.13: Commercial Fishing/Aquaculture;
- CDP Objective 13.7: Aquaculture;
- CDP Objective 13.9: Ports, Jetties, Harbours, Quays and Piers.

The information provided regarding the Common Fisheries Policy is noted.

As regards compatability with potential Offshore Wind development, I consider that CDP Objective 13.5: Offshore Renewable Energy (ORE) Development will ensure the interests of the Commercial Sea Fisheries sector are protected. Those interests will also be protected by the protection measures as contained in Volume 7 of the CDP which contains the Shannon Integrated Framework Plan (SIFP).

I consider that any reference to the Department of the Marine shall be updated to the full name (Department of Agriculture, Food and the Marine) in Volume 1.

Chief Executive's Recommendation

Volume 1 Appendix 1 Development Management Guidelines shall be amended as follows:

A1.8 Agricultural Developments

The rural countryside is a natural resource with agricultural activity being particularly important. In considering proposals for agricultural development (walls, fences, yards, stables, sheds, slurry pits etc.) the Planning Authority will have regard to the Department of Agriculture, Food and the Marine document Guidelines and Recommendations on the Control of Pollution from Farmyard Wastes together with the following.

Volume 1 Appendix 9 'Implementation and Monitoring' Section 11. Transport, Service Infrastructure & Energy shall be amended as follows:

CDP11.39 Agricultural Waste	√					Department of Agriculture, Food and the Marine, Farming Community	Ensure compliance with the stated standards	Ongoing via the development management process	

Volume 1 Appendix 9 'Implementation and Monitoring' Section 13. Marine and Coastal Zone Management shall be amended as follows:

CDP13.8 Shellfish Waters Directive		√		Department of Agriculture, Food and the Marine, EPA	Quality of Shellfish waters	Achievement of water quality standards set out in the Shellfish Waters Directive in the five designated Shellfish Waters in the county	
CDP13.11 Coastal Erosion & Flooding	√	√		Development Management, Department of Agriculture, Food and the Marine, OPW	Coastal erosions and flood relief schemes	1. No. of coastal erosion flood relief schemes planned/commenced/completed No. of planning applications granted/refused within Coastal areas at risk	

CDP13.15 Island Development				NPWS, OPW, Department of Agriculture, Food and the Marine, Department of Arts	Strategy for the Islands	1. No. of planning applications granted for new infrastructure, access/landing facilities and associated development proposals on 2. No. of Awards received for sustainable development of islands in the county e.g. environmental, heritage etc.	

Submission No: S2/013 – Irish Water (IW)	
Relevant Chapters / Topics	• Core Strategy • Physical Infrastructure, Environment and Energy • Water and wastewater Infrastructure • Water Supply Project Eastern and Midlands Region • South Clare/University of Limerick Strategic Development Zone (SDZ) • Economic Development – Data Centres • Rural Development and Natural Resources • Tourism • Shannon Estuary • Marine, Coastal and Island Management • Appendix 2 Indicative Land Use Zoning Matrix • Volume 3 Settlement Statements

Summary of Issues Raised in Submission

This submission relates to water and wastewater facilities in County Clare. In the submission the inclusion of objectives that will support the delivery of IW plans, programmes and policies are welcomed. A number of items are addressed in the submission as follows:

Sustainable Drainage and Green-Blue Infrastructure

Irish Water welcomes the inclusion of objectives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure.

Planned road and public realm projects

IW requests early engagement in relation to road and public realm plans and projects to ensure public water services are protected and to ultimately minimise disruption to the public.

Core Strategy

IW notes that the Core Strategy Table utilises Section 4.4.3 of the draft Development Plan Guidelines for Local Authorities in determining 'Zoning Land Required'. In addition, in many settlements, the zoned lands in the 'Zoning as per Map' column is further increased for reasons explained in the footnotes. In this regard, IW notes that if all of these lands were fully developed, strategic network reinforcements as well as treatment plant upgrades may be required in some settlements.

Zoning

IW notes that in several settlements, the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g. residential dwellings including Quin, Killimer, Kilfenora, Feakle, Crusheen and Ennistymon. In this regard, any future development of these lands should take account of the established use of the existing wastewater treatment plant and the potential for extensions / intensification of use of the WWTP in the future. In addition, where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works.

IW provide information on new water connections for commercial and residential development, and in relation to protecting Irish Water assets on sites proposed for development.

Wastewater Treatment Plants (WWTP)

IW notes that details of available capacity for Irish Water WWTPs in Clare are available on its 2020 Wastewater Treatment Capacity Register and refers to an attached table which provides an overview of their ability to cater for the planned population growth identified in the Core Strategy Table, as follows:

- Ennis - served predominantly by Ennis North WWTP c.7,000pe spare capacity.
- Shannon - WWTP upgrade was completed in 2021 to improve performance and provide significant additional capacity
- Athlunkard, Clonlara and Parteen - served by Limerick City WWTP which has headroom available and a project underway to provide additional capacity.
- Ballycannan - project underway to connect the settlement to the Limerick City agglomeration.
- Killaloe, Ennistymon, Lahinch, Newmarket-on-Fergus and Kilfenora - WWTP upgrade projects to increase capacity for growth and/ or improve compliance are progressing.
- Ballyvaughan, Liscannor, Kilkee and Kilrush (all previously untreated) – Capital investment projects ongoing to provide WWTPs.
- Doonbeg - project to provide additional capacity to cater for the projected population growth is being progressed via Irish Water's Small Towns and Villages Growth Programme.
- Kilmihill - A project to provide WWTP capacity is at an early stage. It is anticipated the project will be completed within the lifetime of the new Plan.
- Kildysert - Initial scoping for a project at Kildysert WWTP will be carried out in 2022. It is anticipated the project will be completed within the lifetime of the new Plan

Wastewater Networks

IW notes a capital project is also underway to pump the wastewater load from Clarecastle to Clareabbey WWTP and refers to a 2019 Network Development Plan (NDP) for Ennis that will help inform how undeveloped zoned sites could be serviced.

Refers to Drainage Area Plans (DAPs) assess the wastewater network in detail to identify issues and needs and notes a DAP for Ennis is due to commence in 2022.

Water Supply

Notes a number of upgrades to water treatment plants in the county which are underway or planned including New Doolough Water Treatment Plant (WTP) in West Clare, Castle Lake WTP in Shannon/Sixmilebridge WRZ and the interconnection of Ennistymon water resource zone (WRZ) to the West Clare WRZ to improve security of supply.

Water Supply Project Eastern and Midlands Region (WSP)

Provides an overview of this project which has been developed to deliver a long-term, sustainable, resilient water supply source for the Eastern and Midlands Region and in the context of the draft Regional Plan for The Eastern and Midlands Region. It is noted that to provide the power required existing electrical infrastructure in County Clare will be upgraded including uprating of existing Ardnacrusha – Birdhill 38kV OHL (Over Head Lines).

IW welcomes Objective CDP 11.28 Strategic Water Supply Projects, but notes there is no reference within the Draft CDP to the Eastern and Midland Regional Water Resources Plan (EMRWP) which was published on December 14th 2021 and is open to public consultation until 14th March 2022.

IW also notes that amongst the options outlined in the Draft EMRWP is a preferred regional approach termed the 'New Shannon Source' which would facilitate the transfer of water from Parteen Basin to other areas within the region. Given that this region includes eastern County Clare, IW would welcome the inclusion of a reference to the *Eastern and Midland Regional Water Resources Plan* in the Plan.

IW refers to Objective CDP*2.22 Ardnacrusha Hydroelectric Power Station* and notes abstraction from Parteen Basin associated with WSP will result in a relatively minor reduction in the generation capacity of Ardnacrusha and will not have a significant impact on the output production of Ardnacrusha. In addition, IW refer to Objective CDP6.8e) which relates to the future reopening of the Errina Canal and notes it is not anticipated that WSP would have an impact upon any future reopening of the Errina Canal.

Proposed South Clare/University of Limerick Strategic Development Zone (SDZ)

IW note that the proposed SDZ has the potential to require significant network reinforcements as well as treatment plant upgrades and supports the Council's decision to adopt a plan-led approach for the development. IW requests continued engagement, in particular through the two-year planning period following SDZ designation and considers the inclusion of a brief overview of infrastructure needs (water, transport, etc) in Section 6.9.1 of the Plan would be beneficial.

Additional Comments/Suggestions

Section	Comment
	Suggested additions in red and deletions in ~~strikethrough~~
DPO CDP Ennis 4.1 DPO CDP Shannon CDP 4.4 DPO CDP Service Towns CDP 4.5 DPO CDP Small Towns CDP 4.6	With regard to the objective: *To monitor the cumulative effect of grants of planning permission on available wastewater capacity where connection to a public wastewater treatment plant is included as part of a development proposal,* IW notes that developers shall be required to connect to the public network, where available and the general presumption is that development will be focused into areas serviced by public water supply and wastewater networks. Suggested amendment: ***To work with the relevant bodies and to seek investment for the timely and sustainable delivery of holistic infrastructure to meet the objectives of this Plan ~~enhance the levels of amenity and design quality and to~~ ~~regenerate and rejuvenate the ….. throughout the~~*** ***~~County.~~***

Section 6.28 Data Centres	Notes that developers requiring connections are to engage with IW via the New Connections process and that water conservation and the use of water-efficient technologies will be required.
Chapter 8 Rural Developmentand Natural Resources Chapter 9 Tourism Chapter 12 Shannon Estuary Chapter 13 Marine, Coastal and Island Management	Considers development associated with extractive industries, renewable energy, low carbon economy developments, forestry, peat extraction, aquaculture, tourism etc must have due regard for, and not adversely impact, existing or planned water sources or other IW infrastructure. Refers to requirements for new connections. Notes that IW would welcome the opportunity to provide input on the proposed plans such as the Integrated Environmental Management Plan for the Shannon Estuary, Integrated Coastal Zone Management Plan, etc.
11.2.9.3 Access onto National Roads Exceptional circumstances CDP11.13 Direct Access onto National Roads	Notes forthcoming water and wastewater projects in County Clare may require the creation of additional access points or increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply. Requests provision is made for these projects in section 2.6 Exceptional Circumstances of the Spatial Planning and National Roads Guidelines.
11.3 Water Resources	Queries has the Groundwater Protection Scheme been incorporated into the River Basin Management Plan for Ireland?
In relation to alternatives to public water services to service developments e.g. DPO CDP 4.7 Large Villages (e) DPO CDP 4.8 Small Villages DPO CDP 4.9 Clusters Chapter 9 Tourism S11.4.3 Wastewater Management DPO CDP 11.32 (h) Developer provided infrastructure (i) WWTPs for Small business/ community facilities in unserviced	Refers to IW policy to facilitate connections to existing infrastructure, where capacity exists and notes that alternative solutions (e.g. private wells or wastewater treatment plants) should not generally be considered by planning authorities. In this regard, while the opportunity may arise for a development to connect to the network in the future, IW will not retrospectively take over responsibility for developer provided infrastructure unless agreed in advance. The opportunity may arise for the development to connect into the network in the future however, the developer provided treatment facility would not be taken over.

areas DPO CDP 11.4 Rural Wastewater Treatment Programmes S4.2.5 Single houses in the Countryside S5.2.7 Sites for Independent Development 11.21 (d) Doolin Pier Masterplan Volume 3, Village Growth Areas and other proposed development in unserviced settlements	
DPO CDP 11.29 Water Services (b) DPO CDP 11.30 Water Supply (a) DPO CDP 11.31 Ennis and Environs Water Supply (c) DPO CDP 11.32 WW Treatment and Disposal (a) DPO V3(a)17 (d), DPO V3(a)18 (a)	Notes the early engagement in the preparation of masterplans and planning of development areas is welcomed and details are provided in relation to IW's new connections policy for residential, commercial and industrial connections and the attached water services summary table which outlines capacity over the plan period.
DPO CDP 11.26 (e) Water Framework Directive and River Basin Management	IW suggest the following amendment: **…To protect groundwater and surface water resources…. set out in the National River Basin Management Plan 2022-2027, and any subsequent management plans.**
Water quality impacts	To align with the recent Weser ruling in relation to the Water Framework Directive, it is suggested that amendments are made to CDP11.26 and 11.3 (and any other applicable objectives) as follows: DPO CDP 11.26 WFD and River Basin Management (g) Suggested amendment to CDP11.26 (g) third bullet point: **To consider proposals for development which infringe on a river boundary, or an associated habitat, including their**

	connection by groundwater, only where it can be clearly demonstrated that There will be no deterioration of water body status ~~impact on the ecological, aquatic or fishing potential of the waters or associated waters~~ DPO CDP 11.33 Strategic Wastewater Treatment Projects (c) Suggested amendment: **To ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water ~~quality~~ body status or give rise to adverse impacts on the integrity of the Natura 2000 network.**
Development in the riparian margin e.g. CDP11.26(g), CDP15.16	IW welcome objectives protecting the riparian margin to protect biodiversity and water quality and considers the Draft Plan should allow for access to and maintenance of existing and new IW infrastructure within these corridors, subject to proper planning and sustainable development.
S11.3 DPO CDP 11.27 Water Resources	IW suggests the following amendments: **a) To support protection and improvement of the quality of drinking water sources ~~the development of Drinking Water Protection Plans~~ in line with the requirements of the Water Framework Directive;**
DPO CDP 11.31 Ennis and Environs Water Supply (Also DPO V3(a)17)	Notes the preferred solution, set out in the RWRP, is to increase the groundwater abstraction at Drumcliff Springs, upgrade Drumcliffe WTP, and further leakage reduction and considers there is adequate capacity available to cater for the core strategy population allocation. In relation to (b), IW have no plans to investigate the use of Pouladower Spring as a potential water supply source for Ennis at present. In this regard, the following amendment is suggested: **(d) ….notwithstanding development that may be required to maintain, upgrade or augment the existing water supply source and infrastructure, subject to proper planning and sustainable development.**

S11.4.3 Wastewater Management	IW suggest the following amendment: **At present there are significant service and compliance issues in many existing wastewater systems in County Clare. A number of treatment plant and network projects are being progressed under Irish Water's 2020-2024 to address these issues.**
DPO CDP 11.32 WW Treatment and Disposal (b) & (c)	IW note that in relation to (b); both seasonal loadings and climate change are taken into consideration in the design and construction of projects progressed under Irish Water Investment Plans. In this regard, the following amendments are suggested: **(c) To advocate for the on-going provision, ~~conservation~~ maintenance and upgrade of wastewater treatment infrastructure in the County;** **g) To permit the development of single dwelling houses in unserviced areas only where it is demonstrated to the satisfaction of the Planning Authority…**
S11.4.3.1 Environmental assessment criteria	IW suggest the following additions to the list: **Nature-based solutions such as constructed wetlands (CWs) and integrated constructed wetlands (ICWs) will not be considered for;** • **Sites that pose an unacceptable risk to drinking water sources.** • **Sites that conflict with the protection guidelines set out in the Clare Groundwater Protection Scheme.**
DPO CDP 11.34 Rural Wastewater Treatment Programme (b)	IW suggest the following amendment: **b) To support the servicing of rural villages (serviced sites) in settlements with adequate public wastewater treatment capacity available, to provide an alternative to one-off housing in the countryside.**
S11.4.4 Storm Water Management	IW suggest the following amendment: **~~In serviced towns and villages with combined sewers the management of storm water~~ The management of combined sewers falls within the remit of Irish Water.**
19.5 Land Use Matrix Appendix 2 Indicative Land Use Zoning Matrix	IW note that 'Utilities' is referenced as a zoning on page 431 but this does not form part of the zoning table on page 462.

Appendix 1 Development Management Guidelines	IW suggest the following amendment: **WW Treatment Systems** **Where connection to the public wastewater network is not available, the Planning Authority, in assessing…** IW also suggest the inclusion of the following text: **Applicants proposing to connect to public water services infrastructure shall engage with Irish Water prior to seeking planning permission. New connections shall be subject to a connection agreement with Irish Water.**
Volume 3a – Ennis 2040	IW notes details are provided on the Ennis 2040 strategy however the document is not included in the Draft Plan. IW encourages the master-planning / plan-led approaches proposed for Ennis 2040 sites and refers to requirement for early and continued engagement to ensure the necessary infrastructure is planned in a phased and efficient manner
Volume 3c S 2, Killaloe	IW notes they have no plans to interconnect the Killaloe and Newport WRZs at present, the preferred solution identified in the RWRP is to upgrade Killaloe WTP. In this regard the following amendment is suggested: **Wastewater from Killaloe is treated in Ballina and the existing wastewater treatment plant is currently operating at hydraulic capacity and cannot accommodate any further ~~significant development~~…**
Volume 3d S2, Kilkee S3, Ballyvaughan	IW suggest the following amendment: **There is currently limited wastewater treatment in Kilkee, however, a new wastewater treatment plant, pumping station and rising main are planned for the town. The WWTP is due to be completed within the lifetime of the Plan. ~~Work is due to commence in late 2023 with completion in early 2025 which will cater for the population target for the town.~~** Suggested amendment: **A new wastewater treatment plant, pumping station including pipework extensions are planned and it is expected that the project will be completed in ~~2023~~ 2024.**

S3, Doonbeg, Inagh	Notes text for sites R1 and R2 refers to compliance with the EPA Code of Practise for Wastewater Treatment. As IW are required to comply with the relevant authorisation issued by the EPA and as both Doonbeg and Inagh are served by public WWTPs, considers it may be more appropriate to refer to the relevant discharge authorisation.
S3, Liscannor	Notes there is a public wastewater network in Liscannor with a planned upgrade, to be completed in 2022/2023, which will provide sufficient capacity to meet the needs of the target population over the plan period.
S3, Kilmihill and Kildysert	Provides details on forthcoming projects Kilmihill and Kildysert WWTPs due for completion within the lifetime of the Draft Plan.
Environmental Reports	Notes that the contents of this submission should be taken account of in the Environmental Reports.

Chief Executive's Response

I wish to thank Irish Water for the submission and I would like to address the issues raised as follows:

Planned road and public realm projects

I note the request from Irish Water for early engagement in relation to road and public realm plans and projects, in order to ensure public water services are protected. While the Draft CDP contains policies supporting the delivery of public realm improvement projects and road construction and upgrade schemes, I consider that engagement regarding public water services will continue to be adequately incorporated in the design, pre-planning and planning consent stages of those schemes and projects. I do not consider it necessary to include explicit policy support for this in the Draft CDP.

Core Strategy

The Core Strategy sets out the quantum, location and distribution of new development and has been informed by the capacity of existing and planned wastewater services infrastructure, based on information provided by Irish Water.

Zoning

I acknowledge the observation by Irish Water that in several settlements, the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g. residential dwellings.

Water Supply Project Eastern and Midlands Region (WSP)

I consider that inclusion of a reference to the Eastern and Midland Regional Water Resources Plan within Objective CDP 11.28 Strategic Water Supply Projects is appropriate, and an amendment to CDP 11.28 is recommended below.

Proposed South Clare/University of Limerick Strategic Development Zone (SDZ)

The Council will ensure continued engagement with Irish Water on the SDZ Planning Scheme, in particular through the two-year planning period following SDZ designation, during which the Planning Scheme will be prepared. I consider that the preparation of the Scheme is the appropriate time and mechanism to finalise the infrastructure needs given a decision on the designation of the SDZ by Government has not as yet been made and I do not consider that their inclusion in the Draft CDP is necessary.

Additional Comments/Suggestions

Settlement Plans

I do not intend to recommend that the suggested edits to the CDP Objectives in Chapter 4 (CDP4.1 Ennis, CDP 4.2 Limerick Shannon Metropolitan Area, CDP4.4 Shannon, CDP4.5 Service Towns and CDP4.6 Small Towns), as regards identification of the intention to seek 'timely and sustainable delivery of holistic infrastructure' at each settlement / settlement level.

Various chapters

I note the comments regarding Data Centres (Chapter 6), Chapter 8 Rural Development and Natural Resources, Chapter 9 Tourism, Chapter 12 Shannon Estuary, Chapter 13 Marine, Coastal and Island Management and CDP 11.3 Water Resources.

National Roads

The submission requests an amendment of the exceptional circumstances for access onto National Roads, which are set out at Section 11.2.9.3, and which are referred to in Objective CDP11.13 Direct Access onto National Roads. The submission requests that provision is made in the 'Exceptional Circumstances' for such additional access points or the generation of increased traffic from existing accesses to national roads that Irish Water may require for water and wastewater projects planned in County Clare over the coming years. It is not set out which sites this request refers to, nor whether the sites require access onto national roads at points at which speed limits of greater than 50kmh apply. It is not established whether such sites would have alternative access points available off a regional or local road. Within the 'Exceptional Circumstances' listed at Section 11.2.9.3, the Council has identified areas where it may adopt a less restrictive approach in the case of developments of national and regional strategic importance which, by their nature, are most appropriately located outside urban areas. These sites have been identified for inclusion, following consultation with TII during previous development plan cycles and they are included in the Draft CDP also. The sites have been identified in accordance with a number of criteria and in accordance with the *Spatial Planning and National Roads – Guidelines for Planning Authorities* (2012).

I note that TII's submission to the Draft CDP (S2/002) does not identify sites for Irish Water use as appropriate for consideration within 'Exceptional Circumstances'. I consider that the submission from Irish Water has not included adequate detail that this part of the submission could be given further evaluation and therefore I do not propose to amend the Draft CDP in this regard.

Alternatives to public wastewater treatment systems

In relation to CDP 11.32 (h) 'Developer provided infrastructure', I consider that given the presence of comprehensive qualifying criteria *(Section 11.4.3.1 Environmental assessment criteria)* that would apply to development seeking to comply with this objective, the objective is in compliance with the Draft Water Services Guidelines for Planning Authorities (January 2018).

River Basin Management

The suggested amendment to CDP 11.26 (e) Water Framework Directive and River Basin Management is appropriate, see recommendation below.

Water Quality Impacts

The suggested amendments to CDP11.27 (rather than CDP11.26 which is mistakenly referred to in the submission) and CDP11.33 are acceptable, as they give effect to the Water Framework Directive.

Development in the riparian margin

The comments of Irish Water are noted in this regard.

Water Resources

Suggested amendment CDP 11.27: The suggested amendment in relation to drinking water sources is appropriate.

Ennis and Environs Water Supply

The suggested amendment to CDP 11.31 (b) regarding Drumcliffe Springs is appropriate given that Irish Water have indicated they have no plans to investigate the use of Pouladower Spring as a potential water supply source for Ennis at present.

Wastewater Management

The suggested amendment to Section 11.4.3, regarding measures to progress the maintenance, upgrading and provision of the County's wastewater drainage system. At present there are significant service and compliance issues in many existing wastewater systems in County Clare. A number of treatment plant and network projects are being progressed under Irish Water's Investment Programme 2020-2024 to address these issues. I agreed with the requested amendments.

Wastewater Treatment and Disposal

In relation to CDP Objective 11.32 (c) and (g) it is acceptable to include the additional wording which adds clarity to the objective.

Environmental Assessment Criteria

Regarding Section 11.4.3.1 which is subsequent to CDP11.32, it is suggested that additions are made to the list of Environmental Assessment Criteria to be satisfied by developer-provided wastewater infrastructure, to ensure the protection of groundwater and drinking water. The additions are appropriate.

Rural Wastewater

It is proposed to amend CDP Objective 11.34b) in order to support serviced sites only in settlements with adequate public wastewater treatment capacity available, to provide an

alternative to one-off housing in the countryside. The Council's support for serviced sites applies to locations where the dwelling can be fully-served by public infrastructure.

Stormwater Management

The requested clarification to Section 11.4.4

Development Management Guidelines

The proposed change to Appendix 1 (DM Guidelines) regarding Wastewater Treatment Systems being acceptable in the absence of a connection to the public wastewater network is acceptable. However, the additional text sought by Irish Water is not acceptable because the section to which it is proposed to add concerns Wastewater Treatment Systems in the context of rural residential development and the advice needs to focus on individual Wastewater Treatment Systems and the EPA Code of Practice.

Settlement Plans

I acknowledge the point made in relation to the Ennis 2040 Strategy which is a non-statutory document to which the Development Plan will have regard.

An amendment to the Killaloe Settlement Plan is requested, as follows:

> Wastewater from Killaloe is treated in Ballina and the existing wastewater treatment plant is currently operating at hydraulic capacity and cannot accommodate any further ~~significant~~ development…..

I consider that the accommodation of development of all formats in Killaloe is subject to the Development Management process, with applications being evaluated on a case-by-case basis. The input of Irish Water will be given due regard in all planning assessments. I do not consider that amending the text in the suggested manner is necessary.

Amendments to the Kilkee, Liscannor and Ballyvaughan Settlement Plans are requested, which give clarity on the duration of the wastewater treatment plant delivery in each settlement. I consider that the suggested amendments are appropriate.

The submission identifies that the description of the R2 lands at Doonbeg in the Doonbeg Settlement Plan contains reference to the EPA Code of Practise for Wastewater Treatment Systems. I have identified this as an error in the draft CDP and have corrected it in my recommendation on submission S2/206.

The submission identifies that the description of the R1 and R2 lands at Inagh in the Inagh Settlement Plan contains reference to the EPA Code of Practise for Wastewater Treatment Systems. I have identified this as an error in the Draft CDP and it should be amended. See my recommendations below.

Environmental Reports

The contents of the submission from Irish Water will be taken account of in the Environmental Reports within the Development Plan process.

Chief Executive's Recommendation

I recommend that Volume 1, Chapter 11, Objective CDP11.26 is amended as follows:

Development Plan Objective: **Water Framework Directive and River Basin Management**	
CDP11.26	It is an objective of Clare County Council: a) To facilitate the implementation of the *River Basin Management Plan 2022-2027* and any subsequent plan for ground, surface, estuarine, coastal and transitional waters in the Plan area as part of the implementation of the *EU Water Framework Directive*; b) To protect groundwater and surface water resources in accordance with the statutory requirements and specific measures as set out in the *River Basin Management Plan 2022-2027,* and any subsequent management plans; c) To achieve and maintain at least good water quality status for all water bodies except where more stringent obligations are required such as Blue Dot/High Status Objective Water Bodies; d) To consider development proposals where it can be clearly demonstrated that the development will meet the requirements of the *River Basin Management Plan*; and e) To work with and support LAWPRO and support improvements/recommendations within Priority Areas for Action, Blue Dot/High Status Objective catchments and any additional areas identified within subsequent River Basin Management Plans.

I recommend that Volume 1, Chapter 11, Objective CDP11.27 is amended as follows:

	Development Plan Objective: **Water Resources**	
	CDP11.27	It is an objective of the Clare County Council: a) To support ~~the development of Drinking Water Protection Plans~~ protection and improvement of the quality of drinking water sources in line with the requirements of the *Water Framework Directive*; b) To ensure that developments that would have an unacceptable impact on water resources, including surface water and groundwater quality and quantity, designated sources protection areas, estuarine, coastal transitional waters, river corridors and associated wetlands will not be permitted; c) To ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment; d) In areas of potable groundwater resources or over vulnerable aquifer areas, to consider development proposals only if the applicant can clearly demonstrate that the proposed development will not pose a risk to the quality of the underlying groundwater; e) To protect groundwater resources, in accordance with statutory requirements and specific measures as set out in the *National River Basin Management Plan 2022-2027*; f) To work with and support Irish Water, the Group Water Scheme Sector and LAWPRO in identifying public drinking water sources vulnerable to climate change and develop source protection or alternative sources, in order to maintain water quantity and quality levels; g) To consider proposals for development which infringe on a river boundary, or an associated habitat, including their connection by groundwater, only where it can be clearly demonstrated that: • The character of the area will be conserved; • An acceptable physical riparian zone will be maintained; and • There will be no deterioration of water body status; ~~impact on the ecological, aquatic or fishing potential of the waters or associated waters~~. h) To work with Irish Water to find a sustainable and long-term solution for the production, minimisation and

	beneficial reuse of water sludge as a by-product in order to minimise risk to human health and the environment.

I recommend that Volume 1, Chapter 11, Objective CDP11.28 is amended as follows:

Development Plan Objective: Strategic Water Supply Projects	
CDP11.28	It is an objective of Clare County Council: a) To support investment and the sustainable development of strategic water supply projects of Irish Water and leakage reduction programmes and initiatives through the *National Water Resources Plan, the Eastern and Midland Regional Water Resources Plan* and subject to appropriate environmental assessment and the planning process; ……

I recommend that Volume 1, Chapter 11, Objective CDP11.31 is amended as follows:

Development Plan Objective: **Ennis and Environs Water Supply**	
CDP11.31	It is an objective of Clare County Council: a) To improve efficiency in the operation and demand management of the water supply infrastructure, promote water conservation and reduce the overall loss in public water supply in the Ennis and Environs area; b) To safeguard Pouladower Spring and investigate its use as a potential supply of water for the Ennis area. Any proposal with regard to the development of such a supply source shall demonstrate that it will not have a negative impact on European Sites; c) To advocate the provision, by Irish Water, of an adequate water supply to accommodate the target population and the employment potential of the Ennis and Environs area in accordance with statutory obligations as set out by EU and National policy; and d) To protect the Drumcliffe Springs water resource including by not permitting development on either the Springs, or within the established 200 metre exclusion zone, notwithstanding development that may be required to maintain, upgrade or augment the existing water supply

	source and infrastructure, subject to proper planning and sustainable development.

I recommend that Volume 1, Chapter 11, Section 11.4.3 is amended as follows:

11.4.3 Wastewater Management

Irish Water has responsibility for the provision and management of wastewater facilities serving sewered towns and villages, including the management of storm water for combined sewers. The maintenance, upgrading and provision of the County's wastewater drainage system is essential to accommodate future development requirements and to ensure the sustainable development and environmental protection of the County. At present there are significant service and compliance issues in many existing wastewater systems in County Clare. A number of treatment plant and network projects are being progressed under Irish Water's 2020-2024 Programe of Investment to address these issues.

I recommend that Volume 1, Chapter 11, Objective CDP11.32 (c) and (g) is amended as follows:

Development Plan Objective: **Wastewater Treatment and Disposal**	
CDP11.32	It is an objective of Clare County Council: a) To support the implementation of Irish Water Investment Plans and to advocate the provision, by Irish Water, of adequate wastewater treatment facilities to accommodate the target population and employment potential of the County in accordance with the statutory obligations set out in the EU and national policy and in line with the Core Strategy and Settlement Hierarchy set out in this Plan; b) To support the role of Irish Water Investment Plans in taking into account seasonal pressures on critical wastewater treatment service infrastructure and climate change implications in the design of all relevant projects; c) To advocate for the on-going provision, ~~conservation~~ conservation and upgrade of wastewater treatment infrastructure in the County; d) To maximise the use of the existing capacity of wastewater treatment services in the planning of new development; e) To protect existing way leaves and protection areas around public wastewater treatment services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required wastewater treatment services infrastructure;

	f) To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of the existing sewer networks and minimise detrimental impacts on sewage treatment works; g) To permit the development of single dwelling houses in unserviced areas only where it is demonstrated to the satisfaction of the Planning Authority that the proposed wastewater treatment system is in accordance with the *Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses,* EPA (2021);

I recommend that Section 11.4.3.1 'Environmental assessment criteria' is amended as follows:

It will be a requirement that it be demonstrated with scientific certainty that the construction, operation, maintenance, monitoring and decommissioning of any such developer led/provided shared use wastewater treatment infrastructure will not give rise to adverse effects on the site integrity of any European sites in view of their conservation objectives and having regard to the characteristics of the species or habitat, including their structure, function, conservation status and sensitivity to change. Where this cannot be demonstrated with certainty, then developer led/provided shared use wastewater treatment infrastructure shall not be permitted. Nature-based solutions such as constructed wetlands (CWs) and integrated constructed wetlands (ICWs) will not be considered for:

- Settlements within areas of karst landscape
- Areas deemed to be of high nature value or of high biodiversity value
- Sites within 60m up-gradient of any well or spring used for potable water
- Sites within the inner protection zone of a public groundwater supply source, where the vulnerability rating is classified as extreme
- Sites within 300m up-gradient of a public supply (>10m3/day or >50 persons) borehole, where an inner protection zone has not been identified
- Sites within 25m of a dwelling
- Sites where construction of the ICW may negatively impact a site of cultural heritage value
- Sites where adequate land area is not available
- Sites near a watercourse (distances of not less than 10m from the initial and second ponds and no less than 5 m for subsequent ponds will be required)
- Sites that cannot be adequately protected from flood damage. A site-specific flood risk assessment will be required as part of any potential planning application for a Nature Based Solution.
- Sites that pose an unacceptable risk to drinking water sources.

- Sites that conflict with the protection guidelines set out in the Clare Groundwater Protection Scheme.

I recommend that Volume 1, Chapter 11, Objective CDP11.33 is amended as follows:

Development Plan Objective: **Strategic Wastewater Treatment Projects**	
CDP11.33	It is an objective of Clare County Council: a) To support investment in and the sustainable development of strategic wastewater treatment facilities by Irish Water in County Clare arising from initiatives including Investment Plans and Strategic Drainage Area Plans subject to appropriate environmental assessment and the planning process; b) To liaise with Irish Water to ensure adequate wastewater treatment facilities are available to accommodate population growth in the County; c) To ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water ~~quality~~ body status or give rise to adverse impacts on the integrity of the Natura 2000 network; d) To support Irish Water to eliminate untreated discharges from settlements in the short-term, while planning strategically for the long-term in tandem with *Project Ireland 2040* and the *RSES* and in increasing compliance with the requirements of the *Urban Waste-Water Treatment Directive*; e) To support and facilitate the separation of foul and surface water networks in the County; and f) To liaise with Irish Water to identify wastewater treatment plants which are subject to flooding from severe weather events, and to advocate for the prioritisation of these plants for suitable upgrades.

I recommend that Volume 1, Chapter 11, Objective CDP11.34 is amended as follows:

Development Plan Objective: **Rural Wastewater Treatment Programmes**

CDP11.34	It is an objective of Clare County Council: ……. b) To support the servicing of rural villages (serviced sites), in settlements with adequate public wastewater treatment capacity available, to provide an alternative to one-off housing in the countryside; and ……

I recommend that Section 11.4.4 is amended as follows:

11.4.4 Storm Water Management

Storm water can be described as rainwater that falls onto a property or accumulates on the ground and runs off to a storm drain. Storm water increases significantly as a result of developments where permeable surfaces (vegetation and soil) are replaced by impermeable surfaces (car parks, roads, driveways and roofs). ~~In serviced towns and villages with combined sewers the management of storm water falls within the remit of Irish Water.~~ The management of combined sewers falls within the remit of Irish Water.

I recommend that Appendix 1: Development Management Guidelines at 'A1.4.1 Rural Residential Development' is amended as follows:

Wastewater Treatment Systems

Where connection to the public wastewater network is not available, t~~T~~he Planning Authority, in assessing proposals with on-site wastewater treatment systems, must be satisfied that site conditions are suitable for the treatment and disposal of domestic effluent.

The Environmental Protection Agency (EPA) Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e < 10) provides an overall framework of best practice in relation to the development of wastewater treatment and disposal systems, in unsewered areas, for protection of our environment and specifically water quality. The Code replaces previous guidance issued by the EPA on wastewater treatment systems for single houses (EPA, 2000) and sets out the following which will be used by Clare County Council when assessing on-site effluent treatment system proposals:

- An assessment methodology for the determination of site suitability for an on-site wastewater treatment system and identification of the minimum environmental protection requirements. All proposals shall be accompanied by a site suitability assessment in accordance with the Environmental Protection Agency (EPA) code;
- A methodology for the selection of a suitable wastewater treatment system for sites in unsewered areas. All proposals shall be accompanied by the site specific details from the manufacturer of the system;
- Information on the design and installation of conventional septic tank systems, filter systems and mechanical aeration systems;

- Information on tertiary treatment systems;
- Maintenance requirements for the above systems together with written proof of an agreed maintenance contract with the manufacturer of the system to ensure on-going maintenance; and
- All effluent treatment systems shall be designed and maintained in accordance with the EPA publication, The Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses 2008 or any updated version.

I recommend that Volume 3A Ennis Settlement Plan Objective V3(a) 17 is amended as follows:

CCDP Volume 3 **Settlement Plan Objective**	
Objective V3(a)17	It is an objective of Clare County Council: a) To improve efficiency in the operation and demand management of the water supply infrastructure, promote water conservation and reduce the overall level of water loss in the public water supply in the Plan area; b) To safeguard Pouladower Spring and investigate its use as a potential future supply of water for the Ennis area. Any such proposals shall demonstrate that they will not have an impact on European sites; c) To protect Drumcliff Springs water source including by applying a precautionary principle towards development on either the Springs, or within the established 200 metre exclusion zone, notwithstanding development that may be required to maintain, upgrade or augment the existing water supply source and infrastructure, subject to proper planning and sustainable development; and d) To advocate the provision by Irish Water of adequate water supply to accommodate the target population and the employment potential of the plan area in accordance with statutory obligations as set out by EU and National policy.

I recommend that Volume 3D Kilkee Settlement Plan 'Location and Context' is amended as follows:

Drinking water is supplied via the West Clare Regional (Doolough Lake) Water Supply (RWS). There is currently limited wastewater treatment in Kilkee, however, a new wastewater treatment plant, pumping station and rising main are planned for the town. ~~Work is due to commence in late 2023 with completion in early 2025 which will cater for the population target for the town.~~ The wastewater treatment plant is due to be

completed within the lifetime of the Plan. All future development in Kilkee will be contingent upon the provision of adequate wastewater treatment. Kilkee experiences seasonal traffic problems and the construction of a proposed lower ring road which would link the N67 at the Kilkee Bay Hotel, running west to the Carrigaholt Road and continuing to link up with the coast road, would help to alleviate this problem.

I recommend that Volume 3D Liscannor Settlement Plan 'Location and Context' is amended as follows:

The village is connected to the Ennistymon Public Water Supply. There is a public wastewater network in Liscannor and a project is underway to construct a WWTP, which ~~a planned upgrade to this~~ will provide sufficient capacity to meet the needs of the target population over the plan period. The proposed upgrade is due to be completed in ~~2022~~ 2023.

I recommend that Volume 3D Ballyvaughan Settlement Plan 'Location and Context' is amended as follows:

Water supply to Ballyvaughan is from the Ennistymon Regional Water Supply and is subject to the constraints of that supply. The existing public wastewater infrastructure in the village consists of a collection system and tidal holding tank located in the foreshore area. A new wastewater treatment plant, pumping station including pipework extensions are planned and it is expected that the project will be completed in ~~2023~~2024. Once completed it will have capacity to cater for the target population over the lifetime of the plan.

I recommend that Volume 3D Inagh Settlement Plan 'R1 and R2 West of the village' is amended as follows:

These lands are situated in proximity to the village centre adjacent to established residential areas to the north and south. The church and associated car park are located immediately to the east. The site has the capacity to accommodate low density development and will reinforce the centre which has evolved around the school, shop, church, and community centre. An access road shall be provided within the site to provide for potential future access to the undeveloped lands to the north and west. ~~The EPA Code of Practise for Waste Water Treatment Systems must be strictly adhered to on these lands in order to ensure no significant long term effects on the Inagh River, impacts on the current status of the Inagh River and its objective of achieving good status under the Water Framework Directive.~~

Submission No: S2/022 –Mark Taylor	
Relevant Chapters / Topics	• **Newmarket-on-Fergus** • **Lough Gash**
Summary of Issues Raised in Submission	
Proposes a hydrographic survey for Lough Gash in Newmarket such as LIDAR and subsequently for a section to be cleared of weeds to allow for a lake side pontoon to be erected to allow access for locals to a swimming area.	
Chief Executive's Response	
I wish to thank Mark Taylor for his submission. I note Lough Gash is a valuable natural amenity to the local community of Newmarket-on-Fergus. Lough Gash is a designated SAC (Site Code: 000051) designated for the presence of Turloughs together with the habitat type "Rivers with muddy banks with Chenopodion rubri p.p. and Bidention p.p. vegetation". As such, there are strict targets and attributes which need to be maintained and adhered to, in terms of any future potential development, which would include that to which the submissions relates, i.e. a lakeside pontoon . The undertaking of LiDAR surveys is not something which the Council undertakes and would need to seek funding to prepare. The Council would support the community in any funding application to undertake such a survey to inform the future potential development of recreational amenities/facilities in accordance with the site-specific conservation objectives for the site and can provide guidance and assistance through our Rural Development Directorate.	
Chief Executive's Recommendation	
I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.	

Submission No: S2/025 –Dermott Petty	
Relevant Chapters / Topics	• **Doolin** • **Public Infrastructure** • **Recreation and Green infrastructure** • **Public Transport** • **Wastewater**

Summary of Issues Raised in Submission

The submission makes a number of points/requests in relation to Doolin and Lisdoonvarna as follows:

- Footpaths for:
  - Doolin to Ballyreen
  - Dolin to Lisdoonvarana
- Public Transport for the Burren area
- Signposting for the existing Park in Lisdoonvarna
- Need additional parking area
- Need for sewage scheme in Doolin
- Bike paths between Doolin to Lisdoonvarna

Chief Executive's Response

I would like to thank Dermott Petty for the submission.

In relation to footpaths and bike paths, the Doolin Settlement Plan, Volume 3(d) of the Draft Plan, includes a general objective to support increased connectivity in the village including increased pedestrian permeability through the development of a public footpath and public lighting scheme linking Roadford to Fisher Street, and Fitz's Cross to Coogyulla Cross, as well as Doolin Pier. In addition, the Chapter 11, Volume 1 of the Draft Plan, contains policies and objectives for the development of public infrastructure including footpaths and cycle paths including Objective CDP11.5 to support the development and enhancement of long-distance cycling routes in County Clare, in accordance with the *Strategy for the Future Development of National and Regional Greenways and t*o support the development of new accessible walking routes and trails throughout the County.

In relation to public transport, the Draft Plan, contains policies and objectives for the development of public transport including Section 11.2.6 Public Transport and its associated Objective CDP11.8 to support the provision of more regular, efficient and fully accessible bus services throughout the County and to work with all relevant stakeholders to provide new bus pick-up/drop-off locations and bus shelters in towns and villages across the County.

In relation to signposting for the existing Park in Lisdoonvarna, it is not within the scope of the County Development Plan to provide signage. However, the Plan can facilitate the provision of signage and in this regard, the Doolin Settlement Plan includes an objective to support for the development of an integrated Traffic Management Plan for the overall settlement and pier, including a review of speed limits in the village and signage.

In relation to additional car parking, the Doolin Settlement Plan includes an objective to support the provision of infrastructure and services to allow for future growth including the provision of additional car parking facilities and litter management facilities.

I note the point made in the submission in relation to the need for a sewage scheme in Doolin. While I recognise that many settlements in the county, including Doolin, have not been in a position to fulfil their role due to deficiencies in water and wastewater infrastructure, the provision and delivery of such infrastructure is determined and prioritised by Irish Water. However, Objective CDP11.32 in the Draft Plan expresses the Council's commitment to advocate for the on-going provision, conservation and upgrade of wastewater treatment infrastructure in the County.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/047 –Tom O'Brien	
Relevant Chapters / Topics	• **Shannon** • **Shannon Airport**

Summary of Issues Raised in Submission

Marina at Shannon Airport

There is an opportunity to create a marina for sailing boats etc., near Shannon Airport. The lagoon constructed for flying aeroplanes still exists and would be suitable for yachts. The proximity to the airport would facilitate connections and create tourism.

Chief Executive's Response

The Chief Executive wishes to thank Tom O'Brien for his submission and acknowledges the importance of the issues raised.

The Shannon Airport Lagoon lies within both the Lower River Shannon cSAC and SPA which are designated European Sites for a number of Qualifying Interests Features (Habitats and Species) together with a number of Bird Species respectively. The Shannon Airport Lagoon comprises a key component of the Special Protection Area for birds. The interface of the Lagoon where it meets the estuary and the bounding wall of the Lagoon form part of the Shannon Estuary embankment. This embankment is a vital piece of infrastructure not only for the protection and operation of Shannon International Airport but for the town of Shannon which sits below sea level and is extremely susceptible to rising sea levels associated with Climate Change. It is imperative that the integrity of this embankment is maintained. Any break in this infrastructure to create a marina would seriously jeopardise the town of Shannon and the airport. Clare County Council is committed to the development of our maritime tourism sector as is evidenced in our Clare Tourism Strategy and through the inclusion of specific objectives for the development of maritime tourism in Volume 1 of the CDP. Potential locations for future development of marinas and harbours will be undertaken in line with the objectives as outlined in the County Development Plan.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/054 –Orla Neville	
Relevant Chapters / Topics	• **Clonlara** • **Access and Movement**
Summary of Issues Raised in Submission	
The author states that the infrastructure of Clonlara Bridge is not fit for purpose. The author states that traffic management difficulties exist during school times at Clonlara NS which require urgent attention.	
Chief Executive's Response	
The Chief Executive wishes to thank Orla Neville for her submission and acknowledges the importance of the issues she has raised. The submission may refer to Clonlara Bridge (over Errina Canal) which is a Protected Structure (RPS No. 523). Alternatively, it may refer to the bridge at the northwest side of the village which links the village across the Ardnacrusha Canal to the R471 road. That bridge is not a Protected Structure. The Draft County Development Plan (Volume 3b Shannon Municipal District Settlement Plans) contains the following text in the Clonlara Settlement Plan: ***Place Making and Regeneration*** *The following objectives are identified to enhance the public realm in Clonlara:* *To provide traffic calming measures and speed restrictions on the southeast extremity of the bridge, with clear boundary/gateway definition to the settlement;* *To provide improved signage and signalled controls on either side of the bridge to inform users of the proximate main junction (northwest bound) and the school (southeast bound);* *To facilitate an improved set down/pick up arrangement adjacent to the existing school;* *To provide clear signage, marking and directional priorities throughout the village and at the central crossroads;* *To ensure that the pedestrian/cycle network is improved in the village.* It is considered that the Draft County Development Plan makes adequate provision for the issues raised.	
Chief Executive's Recommendation	
I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.	

Submission No: S2/081 –Ross Quinn	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission is in relation to the creation of a new interchange on the M18 at Quin Road, Ennis as noted in Section 11.2.9.1 of the Draft. A map and supporting documentation is included with this submission. Requests that this proposal should be removed based on:

- Cost and damage to communities and the environment,
- Priority should be placed on sustainable communities and away from car transport,
- No logical reasons or needs have been provided,
- Already further significant development proposed for service stations off the motorway nearby and expansion of the Skehanagh link road,
- Cyclists and walkers always used this road to connect residents with schools and retail but in recent years this has become no longer possible as the Council have not prioritised sustainable travel alternatives connecting this side of town.
- Priority should be given to walking and cycling routes along this road for the large populations living here rather than seeking to cut them off further from the town.
- Spending considerable sums on roads that communities in the area do not want or even need makes no sense.
- This objective does not fit with the intentions to reduce car transport, build stronger sustainable communities and protect the existing environment.
- The proposed location is also home to protected species and is part of a looped walk recreation area for hundreds of people every day.
- Would be better to connect the eastern side of town to the existing pitches, churches, schools and shops in the area by footpath and cycle path and thus reduce the need for car transport. This would then mean that the existing interchanges would be sufficient for traffic.
- Roslevan, Knockanean, Gaurus, Gurteen, Ballghboy and Doora have seen enormous residential development and contributions paid to the Council in recent years and share community services but have not seen any improvement in sustainable connectivity.

Chief Executive's Response

I thank Ross Quinn for the submission and address the issues raised below:

The Core Strategy of the Draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft Limerick and Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new

access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the Draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the Draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/085 –Steve McDonogh	
Relevant Chapters / Topics	• **Kilkee** • **Parking**
Summary of Issues Raised in Submission	
The submission suggests that in order to ease the traffic problem in Kilkee, parking should be prohibited on one side of O'Curry Street in daytime during the summer season.	
Chief Executive's Response	
I thank Steve McDonogh for the submission and address the issues raised below. The County Development Plan and its Settlement Plans, including that for Kilkee, present high-level policies and objectives for Co. Clare. It is the responsibility of the West Clare Municipal District Engineer's Office to evaluate the merits local-level interventions such as that proposed in this submission, and implement them if they are suitable.	
Chief Executive's Recommendation	
I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.	

Submission No: S2/093 –Michael Jones	
Relevant Chapters / Topics	• **Shannon Rail Link**

Summary of Issues Raised in Submission

The submission does not include a map.

The submission states that the proposed train link to Shannon airport is a farce and is causing financial and emotional strain to many families in the area. This project will never be viable economically or practically as the airport will never recover to a financially viable infrastructure. The route of this rail link would destroy many farm families and local businesses financially not to mention the environmental impact.

Chief Executive's Response

I thank Michael Jones for the submission and address the issues raised below.

An Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the draft Plan, and is shown on the Settlement Plan maps (where applicable) and on the county-wide 'Infrastructure, Environment and Flood Risk Zone' maps. The alignment has been included over previous successive County Development Plans.

The mapped alignment corresponds with that of the *Shannon Rail Link Feasibility Study,* which identified the preferred route for a rail link between the national rail network and Shannon Airport. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region.

Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

The draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) is a cross-county Metropolitan scale document which sets out the policies and objectives of the National Transport Authority, Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland at a level appropriate to that scale. The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the Limerick Shannon Metropolitan Area (LSMA).

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

> Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:
>
> - In cooperation with the Southern Regional Assembly and the local authorities, seek to develop land use policies for implementation via the RSES and Development Plans

which focus development in the LSMA, and the wider region, on the rail network in order to deliver Transit-Oriented Development and support further investment in suburban rail; and

- Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new stations at appropriate locations integrated with high density Transit-Oriented Development.

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, it is clear that linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

Therefore, the rationale for retaining the Infrastructure Safeguard (Rail) as mapped in the Draft CDP is that it has safeguarded lands for rail connections from Shannon to the existing Limerick-Ennis railway, and that infrastructure for rail travel from Shannon to both Galway and Limerick will continue to be safeguarded.

The Draft CDP includes a written objective (CDP 11.7) for the Shannon Rail Link, which concerns the section of the Shannon Rail Link infrastructural safeguard extending from Hurlers Cross to Shannon International Airport, i.e. not the entirety of the safeguarded alignments mapped in the Draft CDP. Having regard to the submissions received from transport organisations and the general public, I consider that it is more appropriate to ensure that the intended review referred to in CDP 11.7 would take account of the entirety of the safeguarded alignments mapped in the *Shannon Rail Link Feasibility Study* and draft CDP. The intended review will seek to address the potential impacts that are highlighted in the submission.

Chief Executive's Recommendation

I recommend that Chapter 11, Section 11.2.6 Public Transport is amended as follows:

Shannon Rail Link

An ~~undefined infrastructure safeguard~~ Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the Plan in line with the *Shannon Rail Link Feasibility Study* ~~consistent with the Government's objective of achieving balanced regional development, and the infrastructural requirements as identified in the *RSES*~~. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region. Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

Clare County Council will work in conjunction with the NTA, Irish Rail and other relevant stakeholders to carry out a review of the existing feasibility study as it applies to the

Shannon Rail Link infrastructural safeguard extending from ~~Hurlers Cross to~~ the existing Limerick-Galway railway line to Shannon International Airport. This review will include a route assessment to identify a preferred alignment for a potential rail line serving Shannon International Airport, Shannon Free Zone and Shannon Town. The N19 National Road and the ~~undefined~~ infrastructural safeguard of the proposed Shannon Rail Link are located in close proximity. The delivery of the N19 National Road upgrade is a priority of Clare County Council and should take precedence over other infrastructural projects along its route delivering on the significant exchequer investment already made in scheme planning and design.

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:

- Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new stations at appropriate locations integrated with high density Transit-Oriented Development.

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

Policy Objective CDP 11.7 shall be amended, as follows:

Development Plan Objective: **Shannon Rail Link**	
CDP11.7	It is an objective of Clare County Council: a) To work in conjunction with the NTA, Irish Rail and other relevant stakeholders to carry out a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard extending from ~~Hurlers Cross~~ the existing Limerick-Galway railway line to Shannon International Airport taking account of and being informed by the proposals contained within LSMATS to facilitate a Commuter Rail Network for the Limerick - Shannon Metropolitan Area and by the N19 National Road upgrade, and b) To facilitate a proposed Shannon Rail Link which does not inhibit the N19 National Road Upgrade.

Submission No: S2/112 –Dr Colin Doyle	
Relevant Chapters / Topics	• **Renewable Energy** • **Wind Energy** • **Climate Action** • **Strategic Environmental Assessment**

Summary of Issues Raised in Submission

Summary of Comments and Recommendations

1. Urgent Need to Meet Existing Wind Power Targets

Identify barriers to achieving existing target of 550MW installed wind capacity and develop comprehensive pre-planning guidance as appropriate to assist developers.

2. Need for Expansion of Onshore Wind Power

Accelerate work on identification of additional onshore wind power to bring Clare up to around 900MW, in alignment with CAP 2021, to enable immediate implementation when the revised wind energy guidelines are published.

3. Misleading Claims on Renewable Electricity Consumption in Clare

References in the Draft CDP to Clare already having almost 100% renewable electricity are erroneous, profoundly misleading, and seriously undermine the energy analysis.

4. Renewable Energy Target for 2030

The 100% renewable energy goal for 2030 appears to be technically unachievable and would inevitably be missed. Revise downwards to a more credible achievable level.

5. Unrealistically High Biomass projection

Very high biomass projections risk target being missed. Revise projected biomass resource downwards to a more credible level that can be achieved.

6. Renewable Transport

The target for renewable transport is very low, and less even than the contribution from the existing biofuel obligation scheme.

7. Micro-Thermal

Clarify what is meant by “micro-thermal” – is it heat-pumps plus small-scale biomass, and in what proportion?

8. Estimates of Renewable Energy in Clare

Revise analysis to show clearly what the percentage of renewable energy is currently used in Clare, and realistically projected at the end of the plan.

9. Alignment With CAP 2021 and National GHG Reduction Target for 2030

Revise analysis and presentation to show how the plan will align with National Climate Action Plan 2021 (CAP 2021) and the national GHG reduction target of 51%.

10. Strategic Environmental Assessment (SEA)

Include GHG impact of CDP 6.27 (Data Centre) in Strategic Environmental Assessment. Its omission leaves the SEA wide open to challenge.

11. Yield from Solar PV

There is a significant error in the yield from solar PV in the tables. It appears to be overestimated by a factor of ten, presumably due to omission of a capacity factor in the calculation. Consequently, the totals in the energy tables in Volume 5 are also incorrect. It appears also that in some of the tables electrical and transport energy consumption have been switched. I have incorporated what I believe to be the correct figures in my analysis.

Chief Executive's Response

I thank Dr. Colin Doyle for the comprehensive submission and I would like to respond as follows.

1. Clare County Council acknowledge the urgency of the need to meet the existing wind energy targets of 550MW. County Clare has substantial renewable energy resources, of which Wind is the greatest asset, and will seek to maximise its potential. The capacity to harness Clare's resources and generate energy will need to be balanced along with other considerations including community acceptance of energy infrastructure, the ecological and environmental impact of energy generators, energy infrastructure capacity and development, landscape characteristics, and land use changes. Furthermore, locational considerations such as proximity to, or within designated areas such as NHA, SPA and SACs, proximity to suitable demand centres, energy, and transport infrastructure, and competing economic and social interests present challenges which will need to be navigated to achieve the targets set out. Under Action 102 of the Climate Action Plan 2021, a review and revision of the Methodology for Local Authority Renewable Energy Strategies (LARES) will be carried out and will aid in providing comprehensive pre-planning guidance to developers. This process is underway. Clare County Council has also indicated an intention to update the County Wind Energy Strategy, which will give an opportunity for the more detailed research and assessment as suggested in the submission.

2. While it is acknowledged that County Clare has an abundance of resources that have the potential to provide many times its actual energy needs from renewable sources, it is important that the adoption of renewable technologies is aligned with a balanced, sustainable and plan-led approach. It is also noted that there are several submissions to the Draft CDP sounding concern about proliferation of wind energy in Clare. The targets **established in the RES should not be interpreted as a ceiling**, and in the event that significant progress is being made towards the overall goal of a low carbon economy through renewable energy generation, any further projects, and site designation required to realise them, should not be delayed or influenced by the fact they may result in any of the established targets being exceeded.

3. The data for Energy Consumption and Generation came from an Energy Emissions Balance (EEB) produced for County Clare in 2021. This followed a methodology established by a team from University of Aalborg, Denmark, developed for the base year 2010, for the Limerick Clare Energy Agency. Within the EEB methodology, a county-wide consumption of electricity and a county-wide generation of renewable electricity, over the course of a year, was compared as an exercise. This is not necessarily 'meaningless' as it can communicate a sense of the scale of the challenge and opportunity presented for renewable electricity in each geographic area, and it can allow progress to be monitored.

   The electricity generated in Clare via renewables for the study happens to be the same as that consumed during the year period in question (2020), but the submission is correct that electricity generated will be supplied to the national grid, and the mix of renewables on the grid is constantly changing.
   I agree that Figure 3.4 and the commentary before and after should be revised to avoid misunderstanding and this amendment is included in my recommendation.

4. I note the concern expressed over the ambitious target set forward for Clare to have 100% renewable energy is noted. It can be argued that the landscape, topography and richness of the renewable resource available to the county, along with the existing infrastructure allow Clare to strive for this ambitious goal. It also aligns with Clare's vision to become a national leader in renewable energy generation which, along with energy efficiency and conservation, can help achieve balanced social and economic development throughout the County and assist in achieving national climate change mitigation targets.

   Also, while the RES defines the approach up until 2030, meeting this goal (section 3.4, policy RES 3.1) is not specifically linked to that date. It is open to Clare to set a long-term ambitious goal in order to create momentum and stimulate action on an ambitious scale. The targets suggested for wind energy in the submission (point 2) would be similarly ambitious and challenging to achieve.

   I agree that 2030 is too early to meet long term ambitions. I also agree that renewable transport and heat targets are the most challenging to meet. Some of the RES 2030 targets will be revised downwards based on the feedback in this submission and are included in my recommendation below.

5. The biomass resource potential and renewable energy potential was developed as part of the first RES for County Clare (2014) and had its origins in earlier work by the Limerick Clare Energy Agency. At the time, significant progress was made in relation to forging ahead with biomass energy in a number of forms in the county. Unfortunately, various economic and other factors has set this progress back, and some proposed or potential projects have not progressed to construction and operation. However, the potential resource availability is not believed to have changed significantly, and the long-term potential for this sector is still very promising, if regulatory and economic conditions are right at national level. Nevertheless, I am advised that the targets for practical delivery of biomass potential by 2030 should be reduced, to reflect slower than predicted implementation over the past decade. Table 4.3 will be updated with deliverability of three categories (Forest wood fuel & Wood Process by-product, Energy

Crop (SRC-Miscanthus) and Biomass CHP) reduced by 50%.

6. Based on comments in the submission, the likely renewable transport energy use in 2030 has been reviewed, taking into account transport policies and targets in the Climate Action Plan 2021. The overall transport target for 2030, based on NECP projections, includes 204 GWh categorised under biofuel and electric car. Due to the policies on phasing out the production of petrol and diesel cars and increasing the biofuel mix for the remaining fossil fuel cars, it is assumed that this target is achievable. Accordingly the row for 'Transport' in Tables 4.2 and 4.3 have been updated accordingly and are included in my recommendation below.
   Tables 4.1, 4.2 and 4.3 have been updated and totals calculated again. See revised tables at the end of this submission response

7. The submission request seeks clarification on what is meant my 'micro-thermals'. Micro-thermal relate to everything mentioned in Chapter 10 Micro-generation and includes solar.

8. Comments in relation to the Energy Emissions Balance have been addressed in Point 4 above. The targets set out in the draft RES (including proposed revisions) are considered appropriate, setting ambitious goals across electricity, heat, and transport. The RES policies are what will drive and enable the development of the renewable energy solutions in the county. While the alternative energy balance presented is acknowledged, it is not considered necessary or beneficial at this stage in the CDP process, in terms of setting policies to guide future development, to carry out a fundamental revision of the energy analysis in the draft RES.

9. Section 2.3 of the Draft CDP outlines the statutory and planning context which sets the climate action parameters and requirements that Clare County Council must adhere and align to, and the Council is committed to the implementation of those actions.
   Under the Climate Action Plan 2021, each local authority is required to prepare a Climate Action Plan which will include a Baseline Emissions Inventory following a recommended format and methodology. It is considered that this is the more appropriate way to examine county-wide GHG emissions in a comprehensive way, as opposed to in the context of the RES.

10. In response to comments made in the submission which relate to the SEA of the CDP in the context of GHG emissions relating to Data Centres I note that Section 5.9.3 of the SEA of the CDP deals specifically with Green House Gas Emissions from all sources including Data Centres. Under "Issues and Threats in the Plan Area" of Section 5.9.3 I consider it appropriate to include an additional paragraph which specifically relates to Data Centres which is included in my recommendation below.
    On foot of the SEA Environmental Report recommendation, I consider it appropriate that a sub-section to Objective CDP 6.27 which addresses the inefficiencies in data centre energy and cooling systems should be included in the Draft Plan and this is included in my recommendation below.

11. I note the submission correctly points out that an error occurred converting available solar capacity to GWh. The delivery factor for solar was not applied to the GWh which requires each of these values to be reduced by 10%. In this regard Tables 4.1, 4.2 and 4.3 in Chapter 4

of the RES will be updated and totals re-calculated as set out in my recommendation below.

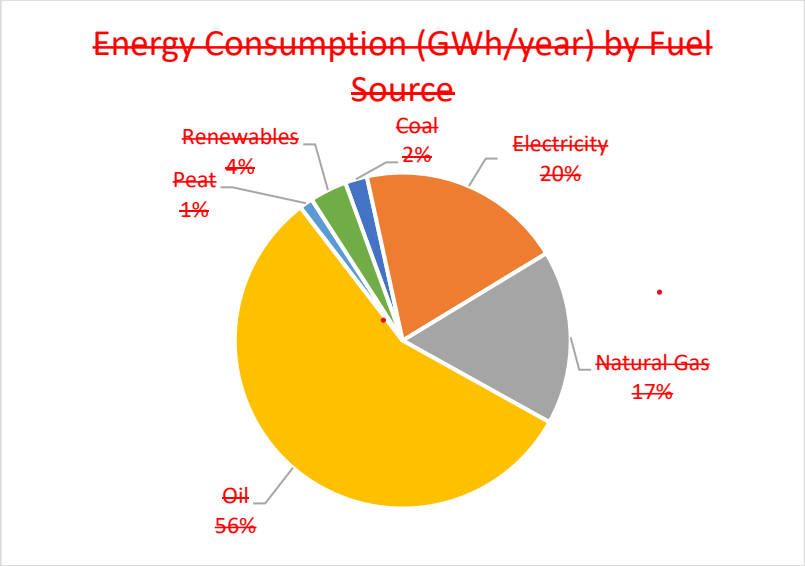
Chief Executive's Recommendation

I recommend the following amendments to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

- Renewable Energy Strategy, Chapter 3, section 3.3, p38-39 – amendment as follows:

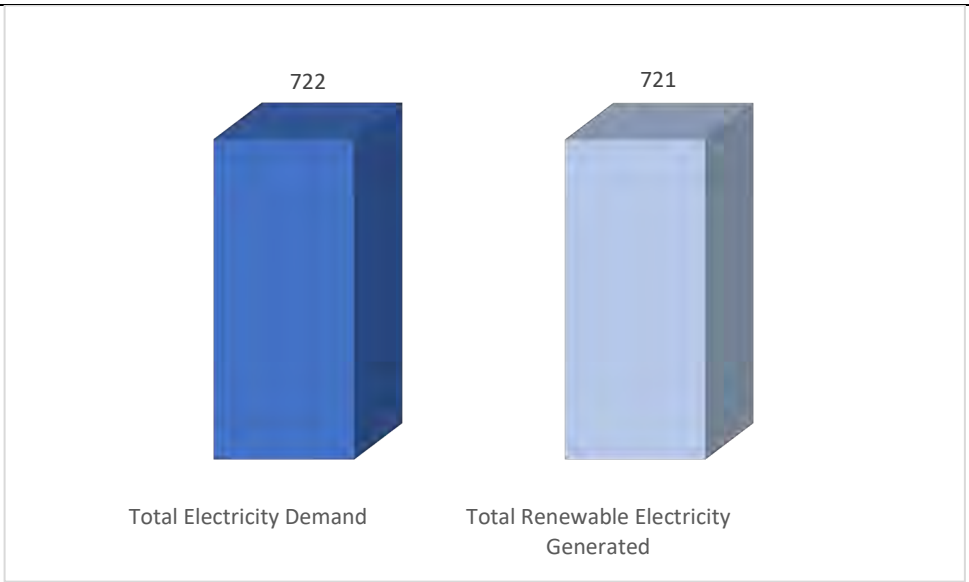
~~The Energy Emissions Balance shows that the total electricity demand in Clare in 2020 was 722 GWh and the total renewable electricity generated in Clare was 721 GWh. If the local produced renewable energy is allocated to Clare first, then there is 1 GWh of electricity which still needs to be met. In practice, the electricity mix supplied to County Clare will include fossil fuels and there are CO_2 emissions from other sectors~~.

~~Figure 3.3 Energy Consumption by Fuel Source – 2020~~



Turning to electricity, the Energy Emission Balance found that during 2020, the demand for electricity over the course of the year (722 GWh) happens to almost match the electricity generated from renewable energy generators located in County Clare over the same period (721GWh), which includes the large hydro-electric generation plant at Ardnacrusha. This is represented in Figure 3.4 below.

Figure 3.4 Renewable Electricity Generation vs Electricity Demand during 2020 (GWh)



In reality, electricity generation and consumption on the grid cannot be allocated on a county-by-county basis, because all energy on the national grid is shared, and also the penetration of renewables – including wind and solar generators – being integrated onto our all-island grid is variable.

- Renewable Energy Strategy, Chapter 4, page 46 below table 4.3 – amendment to wording as follows:

In relation to off-shore wind it is currently unclear whether or how these would be considered in the context of a local authority renewable energy strategy or its targets ~~as to who would have the remit over wind farms off-shore and the energy generated from them.~~ Also, it is likely any off-shore construction activity will be post 2030. Taking this into account, there should be no target set for off-shore wind but instead the focus should be on the development of the on-land service infrastructure in preparation for when the time comes for the delivery of off-shore installations. Details of offshore wind and Marine Renewable are in Chapter 9 of this RES.

- Renewable Energy Strategy, Executive Summary, page 9 – amendment to table titled 'Progress and Outlook' for specific sectors – amendment to row headed 'Wind Energy (onshore) as follows:

	Progress to date	Outlook to 2030
Wind Energy (onshore)	~~Strong~~ Significant progress (153MW installed)~~, enabling Clare to supply enough electricity to meet its own initial needs~~. Still fell short of original target of 500MW installed capacity.	A coherent Wind Energy Strategy (WES) has been useful. A review of the WES will enable future growth to be managed (to be undertaken when new wind energy guidance is issued).

- Strategic Environmental Assessment – Environmental Report, Section 5.11.8 "Issues and Threats" to include additional text as follows:

  'In addition, Data Centres have recently become a topic of national concern due to their energy consumption and strain on the national electricity operator, Eirgrid. Data Centres are dependent on a number of infrastructural requirements for them to function which include uninterrupted power supplies, ventilation, cooling systems, and network connectivity. With Data Centres consuming significant amounts of energy to function, they have been criticised for having a negative impact on the environment. Ireland currently has approximately 70 operational Data Centres. The centres are responsible for 1.58% of Ireland's carbon emissions. Due to their reliance on the national electricity grid, the facilities are mostly powered by gas. There is one site identified in County Clare with a specific zoning objective around the location of a Data Centre which is at ENT3 just outside Ennis. The key source of emissions from these facilities aris from the necessary cooling system. From a climate perspective, the need for energy and cooling systems are not problems in their own right, it is the inefficiency of these systems and the underutilisation of the heat removed by the cooling system'.

- Volume 1 Written Statement, Chapter 6 Economic Development and Enterprise, CDP 6.27 Data Centres – include an addition to the objective as follows:

"It is an objective of Clare County Council: To facilitate and support the development of a data centre on the Enterprise zoned lands (ENT 3) at Toureen Ennis subject to normal planning considerations and the implementation of the findings of the SEA and AA associated with this Plan.

Any planning application for this site must include an analysis of the impacts from Green House Gas (GHG) Emissions associated with both the energy and cooling systems on the environment in the context of Climate Change and our commitment in CAP 2021 which is to achieve a reduction of 51% in GHG emissions by 2030".

- Renewable Energy Strategy, Chapter 3, Tables 3.2- to update the table as follows:

County Clare	**2020**	**2030**	**2050**
Total Final Energy Demand	**GWh/y**[1]	**GWh/y**	**GWh/y**
Thermal Energy	1,507	1,041	1,162
Electric Energy	722 ~~1,427~~	914 ~~1,299~~	1,297 ~~1,041~~
Transport	1,427 ~~722~~	1,299 ~~914~~	1,041 ~~1,297~~
Total Final Energy Use	**3,656**	**3,253**	**3,500**

[1] Gigawatt hours per year. A gigawatt hour is a measurement of energy quantity. One gigawatt hour is equal to one million kilowatt hours. It provides an amount of energy which could power approximately 200 homes for a period of one year.

- Renewable Energy Strategy, Chapter 4, Tables 4.1, 4.2 and 4.3 – to update the tables as follows:

Table 4.1 County Clare Gross Renewable Energy Resource - Unconstrained

Chapter	Renewable Energy Resource: - Unconstrained	County Clare	
		GWh/y	MW
Thermal			
8	Forest wood fuel & wood Process by-product	256.5	48.8
8	Energy Crop (SRC-Miscanthus)	700	159.8
12	Geothermal	306.5	140
10	Micro Thermal	962.8	549.1
Sub Total		***2,225.8***	***897.7***
AD-CHP*thermal			
8, 14	AD - Grass Silage	181	23
8, 14	AD - Animal wastes	32	4.1
14	Municipal Organic MSW	226	28.7
10	Micro CHP	74.7	10.7
8, 12	Biomass CHP	460.5	58.4
Sub Total		***974.2***	***124.9***
Electric			
6	Onshore wind	13,766.00	4,761.60
9	Offshore wind	819	311.6
7	Solar (Utility Scale)	8,489.70	11,269.00
11	Hydro	467.8	89
9	Wave	19,700.00	7,496.20

9	Tidal	367	127
10	Micro Gen elec	48.6	14.9
8, 10	CHP electric	584.5	35
Sub Total		***44,242.6*** ~~***120,649.9***~~	***24,104.3*** ~~***23,792.7***~~
13	***Transport***	***1,404.0***	***200.3***
Overall Resource		***48,846.6*** ~~***125,253.9***~~	***25,327.2*** ~~***25,015.5***~~

Table 4.2 Renewable Energy Resource Targets (Technical and Practical)

Chapter	**Renewable Resource**	**County Clare**	
	Technical & Practical	**GWh/y**	**MW**
Thermal			
8	Forest wood fuel & Wood Process by-product	128.3	29.3
8	Energy Crop (SRC-Miscanthus)	175	39.9
12	Geothermal	134.9	61.6
10	Micro Thermal	529.5	302
Sub Total		***967.7***	***432.8***
AD-CHP*thermal			
8, 14	AD - Grass Silage	60.3	7.6
8, 14	AD - Animal wastes	16	2
14	Municipal Organic MSW	75.3	9.5
10	Micro CHP	3.7	0.5
8, 12	Biomass CHP	460	58.3
Sub Total		***615.3***	***77.9***

Electric			
6	Onshore wind	2,753.20	952.4
9	Offshore wind	272.7	103.8
7	Solar (Utility Scale)	8,388.77	11,135.00
11	Hydro	468	89
9	Wave	197	75
9	Tidal	110.1	41.9
10	Micro Gen elec	16.1	4.8
8, 10	CHP electric	307.6	29.2
Sub Total		***12,513.5*** ~~***88,011.7***~~	***12,431.1*** ~~***12,327.3***~~
13	***Transport***	***204.0*** ~~***140.4***~~	***29.1*** ~~***20.0***~~
Overall Resource Target		***14,300.5*** ~~***89,735.0***~~	***12,970.9*** ~~***12,858.2***~~

Table 4.3 Renewable Energy Resource targets (Accessible – Planned)

Chapter	Renewable Energy Resource Accessible - Planned	County Clare GWh/y	 MW
Thermal			
8	Forest wood fuel & Wood Process by-product	64.2 ~~128.3~~	14.7 ~~29.3~~
8	Energy Crop (SRC-Miscanthus)	87.5 ~~175.0~~	20.0 ~~39.9~~
12	Geothermal	34.0	15.0
10	Micro-Thermal	175.7	92.8
Sub Total		***361.4***	***142.4***
AD-CHP*thermal			
8, 14	AD - Grass Silage	20.1	2.5
8, 14	AD - Animal wastes	15.8	2.0
14	Municipal Organic MSW	25.1	3.2
10	Micro CHP	2.0	0.5
8, 12	Biomass CHP	230.0 ~~460.0~~	29.2 ~~58.3~~
Sub Total		***293.0*** ~~***523.0***~~	***37.4*** ~~***66.6***~~
Electric			
6	Onshore wind	1590.0	550.0

9	Offshore wind		
7	Solar	226.0 ~~2,260~~	300.0
11	Hydro	468.0	89.0
9	Wave	59.1	20.4
9	Tidal	66.1	20.0
10	Micro Gen - elec	7.2	2.1
8, 10	CHP electric	261.5	29.2
Sub Total		***2,677.9 ~~4,711.9~~***	***1010.7 ~~921.7~~***
13	***Transport***	***204.0 ~~14,0~~***	***29.1 ~~2.0~~***
Overall Total Renewable Target		***3536.3 ~~5,761.9~~***	***1219.6 ~~1,167.3~~***
(Of which Community and Citizen owned elements)		*459.1*	*110.3*

Submission No: S2/115 –Conor Cooney	
Relevant Chapters / Topics	• **Shannon Rail Link**

Summary of Issues Raised in Submission

This submission relates to the proposed Railway Line linking Cratloe village to Shannon Airport under the National Development Plan 2023 to 2029 [Clare County Development Plan 2023-2029].

The submission includes a map of the Cratloe settlement from the Cratloe Settlement Plan in the Draft CDP. The submission also includes an objection to the proposed route for the following reasons:

- The proposed line is not the most advantageous route in terms of Pedestrian Accessibility and Community Connectivity as it avoids the largest commuter town on route to the Airport (Sixmilebridge);
- Negative Environmental, Ecological and Habitat effects of the proposal which travels through a flood plain;
- Construction complexities of the proposed route such as challenging topography, ground conditions, lack of available services and Infrastructure, all of which will lead to imprudent spending of Government Funding;
- Lack of Community Connectivity between Shannon and Limerick;
- Needless Intricate Construction and Planning Process;
- Poor Serviced Infrastructure when alternative routes are more adequately serviced;
- Environmental, Ecological & Habitat Negative Effects;
- Flood Plain Location;
- Detrimental effect to the farming community by division of lands & farms, more appropriate routes to be explored;
- Proposed Route does not take advantage of current rail infrastructure;
- Proposed Route lacks local knowledge and the social impacts it will have.

Chief Executive's Response

I thank Conor Cooney for the submission and address the issues raised below.

An Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the draft Plan, and is shown on the Settlement Plan maps (where applicable) and on the county-wide 'Infrastructure, Environment and Flood Risk Zone' maps. The alignment has been included over previous successive County Development Plans.

The mapped alignment corresponds with that of the *Shannon Rail Link Feasibility Study,* which identified the preferred route for a rail link between the national rail network and Shannon Airport. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region.

Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

The draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) is a cross-county Metropolitan scale document which sets out the policies and objectives of the National Transport Authority, Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland at a level appropriate to that scale. The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the Limerick Shannon Metropolitan Area (LSMA).

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

> *Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:*
>
> - *In cooperation with the Southern Regional Assembly and the local authorities, seek to develop land use policies for implementation via the RSES and Development Plans which focus development in the LSMA, and the wider region, on the rail network in order to deliver Transit-Oriented Development and support further investment in suburban rail; and*
>
> - *Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new stations at appropriate locations integrated with high density Transit-Oriented Development.*

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, it is clear that linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

Therefore, the rationale for retaining the Infrastructure Safeguard (Rail) as mapped in the Draft CDP is that it has safeguarded lands for rail connections from Shannon to the existing Limerick-Ennis railway, and that infrastructure for rail travel from Shannon to both Galway and Limerick will continue to be safeguarded.

The Draft CDP includes a written objective (CDP 11.7) for the Shannon Rail Link, which concerns the section of the Shannon Rail Link infrastructural safeguard extending from Hurlers Cross to Shannon International Airport, i.e. not the entirety of the safeguarded alignments mapped in the draft CDP. Having regard to the submissions received from transport organisations and the

general public, I consider that it is more appropriate to ensure that the intended review referred to in CDP 11.7 would take account of the entirety of the safeguarded alignments mapped in the *Shannon Rail Link Feasibility Study* and Draft CDP. The intended review will seek to address the potential impacts that are highlighted in the submission.

Chief Executive's Recommendation

I recommend that Chapter 11, Section 11.2.6 Public Transport is amended as follows:

Shannon Rail Link

An ~~undefined infrastructure safeguard~~ Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the Plan in line with the *Shannon Rail Link Feasibility Study* ~~consistent with the Government's objective of achieving balanced regional development, and the infrastructural requirements as identified in the *RSES*~~. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region. Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

Clare County Council will work in conjunction with the NTA, Irish Rail and other relevant stakeholders to carry out a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard extending from ~~Hurlers Cross to~~ the existing Limerick-Galway railway line to Shannon International Airport. This review will include a route assessment to identify a preferred alignment for a potential rail line serving Shannon International Airport, Shannon Free Zone and Shannon Town. The N19 National Road and the ~~undefined~~ infrastructural safeguard of the proposed Shannon Rail Link are located in close proximity. The delivery of the N19 National Road upgrade is a priority of Clare County Council and should take precedence over other infrastructural projects along its route delivering on the significant exchequer investment already made in scheme planning and design.

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:

- Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new stations at appropriate locations integrated with high density Transit-Oriented Development.

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

I recommend that Policy Objective CDP 11.7 is amended, as follows:

Development Plan Objective: **Shannon Rail Link**	
CDP11.7	It is an objective of Clare County Council: a) To work in conjunction with the NTA, Irish Rail and other relevant stakeholders to carry out a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard extending from ~~Hurlers Cross~~ the existing Limerick-Galway railway line to Shannon International Airport taking account of and being informed by the proposals contained within LSMATS to facilitate a Commuter Rail Network for the Limerick - Shannon Metropolitan Area and by the N19 National Road upgrade, and b) To facilitate a proposed Shannon Rail Link which does not inhibit the N19 National Road Upgrade.

Submission No: S2/152 –James Liddane	
Relevant Chapters / Topics	• **Shannon Rail Link**
Summary of Issues Raised in Submission	
The submission refers to the proposed railway line linking Cratloe village to Shannon Airport under the National Development Plan 2023 to 2029 and notes that it runs through a flood plain, waterways and banks. The proposed rail line runs c.3km through the flood plain, which will lead to complex construction. No map has been submitted.	
Chief Executive's Response	

I thank James Liddane for the submission and address the issues raised below.

An Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the Draft Plan, and is shown on the Settlement Plan maps (where applicable) and on the county-wide 'Infrastructure, Environment and Flood Risk Zone' maps. The alignment has been included over previous successive County Development Plans.

The mapped alignment corresponds with that of the Shannon Rail Link Feasibility Study, which identified the preferred route for a rail link between the national rail network and Shannon Airport. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region.

Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

The draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) is a cross-county Metropolitan scale document which sets out the policies and objectives of the National Transport Authority, Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland at a level appropriate to that scale. The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the Limerick Shannon Metropolitan Area (LSMA).

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

> Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:
>
> • In cooperation with the Southern Regional Assembly and the local authorities, seek to develop land use policies for implementation via the RSES and Development Plans which focus development in the LSMA, and the wider region, on the rail network in order to deliver Transit-Oriented Development and support further investment in suburban rail; and
>
> • Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new

stations at appropriate locations integrated with high density Transit-Oriented Development.

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, it is clear that linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

Therefore, the rationale for retaining the Infrastructure Safeguard (Rail) as mapped in the Draft CDP is that it has safeguarded lands for rail connections from Shannon to the existing Limerick-Ennis railway, and that infrastructure for rail travel from Shannon to both Galway and Limerick will continue to be safeguarded.

The Draft CDP includes a written objective (CDP 11.7) for the Shannon Rail Link, which concerns the section of the Shannon Rail Link infrastructural safeguard extending from Hurlers Cross to Shannon International Airport, i.e. not the entirety of the safeguarded alignments mapped in the draft CDP. Having regard to the submissions received from transport organisations and the general public, I consider that it is more appropriate to ensure that the intended review referred to in CDP 11.7 would take account of the entirety of the safeguarded alignments mapped in the Shannon Rail Link Feasibility Study and Draft CDP. The intended review will seek to address the potential impacts that are highlighted in the submission.

Chief Executive's Recommendation

I recommend that Chapter 11, Section 11.2.6 Public Transport is amended as follows:

Shannon Rail Link

An ~~undefined infrastructure safeguard~~ Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the Plan in line with the *Shannon Rail Link Feasibility Study* ~~consistent with the Government's objective of achieving balanced regional development, and the infrastructural requirements as identified in the *RSES*~~. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region. Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

Clare County Council will work in conjunction with the NTA, Irish Rail and other relevant stakeholders to carry out a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard extending from ~~Hurlers Cross to~~ the existing Limerick-Galway railway line to Shannon International Airport. This review will include a route assessment to identify a preferred alignment for a potential rail line serving Shannon International Airport, Shannon Free Zone and Shannon Town. The N19 National Road and the ~~undefined~~ infrastructural safeguard of the proposed Shannon Rail Link are

located in close proximity. The delivery of the N19 National Road upgrade is a priority of Clare County Council and should take precedence over other infrastructural projects along its route delivering on the significant exchequer investment already made in scheme planning and design.

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:

- Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new stations at appropriate locations integrated with high density Transit-Oriented Development.

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

I recommend that Policy Objective CDP 11.7 is amended, as follows:

Development Plan Objective: **Shannon Rail Link**	
CDP11.7	It is an objective of Clare County Council: a) To work in conjunction with the NTA, Irish Rail and other relevant stakeholders to carry out a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard extending from ~~Hurlers Cross~~ the existing Limerick-Galway railway line to Shannon International Airport taking account of and being informed by the proposals contained within LSMATS to facilitate a Commuter Rail Network for the Limerick - Shannon Metropolitan Area and by the N19 National Road upgrade, and b) To facilitate a proposed Shannon Rail Link which does not inhibit the N19 National Road Upgrade.

Submission No: S2/212 –Conor Malone	
Relevant Chapters / Topics	• **Wind Energy**

Summary of Issues Raised in Submission

The submission objects to further development of wind farms in the West Clare area of Mount Callan, Slieve Curry, Rockmount areas. Objection also cited in relation to the development of piped hydro electric storage facility in the Mount Callan area.

Chief Executive's Response

I thank Conor Malone for the submission.

The Wind Energy Strategy is included as Volume 6 of the Draft Development Plan and there is a commitment through the inclusion of a specific objective in both the draft Renewable Energy Strategy in Section 6.6 Policy Provision and in Volume 1, Objective CDP 11.47 Renewable Energy of the Draft Plan to prepare a new Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. The preparation of a new Wind Energy Strategy will involve a review of the exiting WES in developing future policy for the county.

The installation of Pumped Hydro Electric Scheme (PHES), a mature and large energy storage technique, is dependent on specific geological formations, and thus is a rare opportunity. The proposed site of PHES at Slieve Callan was the outcome following a detailed study of the geographical and physical potential for PHES through the SEA and AA processes. Whilst PHES development has not advanced in Ireland in the past decade, any individual proposed development in the area would be subject to examination through the planning permission process and subject to satisfactory environmental protection and development management processes.

Chief Executive's Recommendation

I recommend that there is no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/218 –Mary Mather Leahy (Shannon Estuary)	
Relevant Chapters / Topics	• **Chapter 10 Sustainable Communities** • **Chapter 12 Shannon Estuary**

Summary of Issues Raised in Submission

In the submission it is requested Clare County Council develop a number of Tidal Pools along the River Shannon and parts of the Clare coast for the recreation and development close to villages and Towns for the use of communities for the following reasons:

- Tidal pools fill up with seawater at every high tides. As the tide drops and the sun heats the water creating Caribbean like swimming conditions (minus the white sand).
- Isolated from the dangers of currents and crashing waves, these tidal pools are ideal for families.
- Can be developed for education and training in Water Sports.

Chief Executive's Response

Clare County Council fully supports the establishment of recreational swimming areas across the county and the value it brings in terms of providing safe recreational spaces for enjoyment, exercise and for tourism. The development of tidal pools is difficult given access to these areas and the issues which arise due to safety concerns given the change in levels associated with the change in tides. At present, the pollock holes in Kilkee are the only recognised tidal pools in the county for swimming and recreation and prove exceptionally popular in the summertime. Clare County Council in recent years have developed the car park, access, and safety parameters around this area through the inclusion of safety rails and steps to access the pools. In addition, the iconic diving boards adjacent to the Pollock holes were reinstated last summer providing additional recreational amenities. Clare County Council do not have any plans at present to develop additional tidal pools.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/219 –Mary Mather Leahy

Relevant Chapters / Topics

- **Ennis**
- **Public Transport**

Summary of Issues Raised in Submission

In the submission it is requested that all the residential estates of Drumbiggle, Stone Court, Pairc na Coille, Ennis Nursing Home, Showgrounds Road, Showgrounds View, Westwood Estate, and Cahercalla be included in the Bus Transport Developments Plan for the Ennis Municipal District and Surrounding area.

Chief Executive's Response

I wish to thank Mary Mather Leahy for the submission and address the issues raised as follows.

Chapter 11 of the Draft CDP concerns Physical Infrastructure, Environment and Energy. Within that chapter, Section 11.2.6 Public Transport contains a sub-section on Bus Transport, which includes the following:

> Clare County Council have carried out a feasibility study of a bus service from Clarecastle to the Gort Road Business Park in Ennis, serving Clare Road, Clon Road, New Road, Steele's Terrace and the Gort Road. The feasibility study showed that there is sufficient demand to make a bus service within the Ennis area feasible. Having regard to this study, Clare County Council will support the provision of such a bus service.

Development Plan Objective: Bus Transport	
CDP11.8	It is an objective of Clare County Council: a) To support the provision of more regular, efficient and fully accessible bus services throughout the County; b) To encourage and support Local Link private/public/ community partnerships in the provision of a more widespread rural bus services; c) To support the creation of bus corridors, integrated bus interchange stations and bus parking facilities both within settlements and at tourist facilities throughout the County subject to appropriate environmental assessment and the outcome of the planning process; d) To promote the introduction of new bus services on routes where they can offer a direct alternative to the routes most popular with private car users;

		e) To work with all relevant stakeholders to provide new bus pick-up/drop-off locations and bus shelters in towns and villages across the County; f) To work with stakeholders to encourage and promote a sustainable community-based public transport scheme that will enable access to service centres for all members of the community in the County; g) To support the provision of a local bus service in Ennis and Clarecastle; and h) To support direct inter-regional bus services to and from Shannon International Airport, Limerick and Galway.

Additionally, Policy Objective CDP11.3: 'Draft Limerick-Shannon Metropolitan Area Transport Strategy and Local Transport Planning' includes the following:

> It is an objective of Clare County Council:
>
> a) To implement the Draft Limerick Shannon Metropolitan Area Transport Strategy during the lifetime of this Development Plan;
>
> b) To implement a Local Transport Plan for Ennis, Shannon, Sixmilebridge, Kilkee, Kilrush, Lahinch, Corofin and Tulla during the lifetime of this Development Plan;

I consider that the Local Transport Plan for Ennis will set out the characteristics of a local bus service for the Ennis area, in terms of its coverage, frequency, capacity and the infrastructural interventions required to facilitate it. The Local Transport Plan for Ennis will be prepared on foot of public consultation and I would invite the author of the submission to engage with that Plan at that stage. I consider that inclusion of certain destinations for a local bus service is not appropriate for a County Development Plan which is a strategic-level document.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/222 –Stephen McDonagh	
• Relevant Chapters / Topics	• **Chapter 2 Climate Action** • **Chapter 16 Architectural and Cultural Heritage** • **Volume 4 Record of Protected Structures** • **Chapter 14 Landscape – Scenic Routes** • **Appendix 5 Scenic Routes** • **Chapter 10 Sustainable Communities – Community Facilities** • **Chapter 6 Economic Development – Broadband, Artisan and Craft Industry & Evening / Late Night Events** • **Chapter 11 Physical Infrastructure – Wastewater Treatment** • **Chapter 17 Towns and Villages – Derelict Sites** • **Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure - Natural Heritage Areas**

Summary of Issues Raised in Submission

The submission makes a number of points/requests in relation to Labasheeda. No map has been included.

Climate Change Adaptation and Mitigation Measures

In the submission it is requested that Clare County Council continues to support the Community with regards Climate Change adaptation and mitigation measures as follows:

- Funding was awarded in 2021 to raise the sea walls along the R473 but continued financial support for people experiencing for any loss or damage to property and land as a result of coastal flooding.
- Better infrastructure needs to be put in place in the village if this is to be successful in reducing CO2 and moving to a greener economy. The climate change ask from farmers need to be fair.
- The new local link bus route has benefited the village but supports for cycling infrastructure and the provision of electric charging points in the village of Labasheeda are essential.
- The village has many green spaces which are important habitats for biodiversity and people alike. Support needs to be provided to Community Gardens in Labasheeda like Mountshannon Park (Tidy Towns) and the ICA Pollinator Friendly Garden.
- Refers to the Labasheeda Project Group and the value of sustainable tourism, the Shannon Estuary Way and natural heritage in the area and nature based tourism e.g. Clonderlaw

Bay.

Protected Structures

In the submission the need to protect and conserve historic buildings as follows is highlighted, the question is asked as to why there are only 3 no. Protected Structures in Labasheeda:

- Kilkerrin Napoleonic Battery
- Killofin Church
- Kilkerrin Church
- Holy Wells
- Ring Forts

Scenic Routes

In the submission it is asked why Kilkerrin Peninsula is not included on Map 4B Scenic Routes.

Community Facilities

In the submission it is noted that new community infrastructure should be supported as well as the improvement of current services and facilities as follows:

- Shops/Pubs
- Post Offices
- Cafes
- Schools
- Holiday Accommodation / Glamping sites / B&Bs
- Community Centre
- Labasheeda Quay
- Church
- Playground I GAA pitch

Sewerage and Wastewater Treatment

In the submission disappointment is noted that the provision of a wastewater treatment plant for Labasheeda has not been mentioned in recent discussions. It is imperative that this infrastructure is brought to Labasheeda to enhance further development of the area.

Derelict Sites

In the submission it is noted that an audit of derelict sites is required and support provided to owners to bring these properties back into use which is in line with your policy of bringing new homes into small towns and villages.

Broadband

In the submission it is noted that townlands surrounding the village do not have adequate broadband. If remote working / blended working is a policy of Clare County Council, then this cannot continue.

Artisan and Craft Industry

In the submission it is requested that Clare County Council and Enterprise Ireland supports businesses such as artisan food producers and craft industries including baking, pottery, jewellery etc. that are part of the community.

Evening / Late Night Events

In the submission reference is made the success of local events such as the Dan Furey Set Dancing weekend and the Estuary Sessions prior to the pandemic. Advice and support are requested on other Evening/Late night entertainment e.g. artistic/cultural events that would benefit the area.

Natural Heritage Areas

In the submission it is noted that Cloon River and Clonderlay Bay form part of an important heritage landscape for Aquaculture and Freshwater Pearl Mussels and are mentioned in previous County Development Plans as not currently being in a good condition. The question is asked will there be help and financial support from Clare County Council and NPWS with regards habitat restoration?

Chief Executive's Response

I which to thank Stephen McDonagh for the submission and acknowledges the importance of the issues raised.

Climate Change Adaptation and Mitigation Measures

The Council is committed to the continued support climate change adaptation and mitigation measures as outlined in this submission. In this regard, the Clare Climate Change Adaptation Strategy 2019-2024 outlines the strategy of the Council to adapt to the effects of climate change and to safeguard the biophysical infrastructure and wellbeing of the people and communities of County Clare. The short-, medium- and long-term objectives of this Strategy have informed the County Development Plan and are incorporated in the development objectives throughout the Draft Plan. Table 2.1 in Section 2.3.5 of Chapter 2, Volume1 of the Plan, provides a list of the Climate Action Objectives included in the Draft Plan.

Protected Structures

I agree that we the need to protect and conserve historic buildings and, in this regard, the Draft Plan contains Volume 4 Record of Protected Structures (RPS) which includes every structure which is, in the opinion of the Planning Authority, of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. In addition, Chapter 16 Architectural, Archaeological and Cultural Heritage, Volume 1 of the Draft Plan, contains policies and objectives in relation to Protected Structures including Objective CDP16.2 protect, as set out in the RPS, all structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest. In relation to the number of Protected Structures in Labasheeda, the RPS is being reviewed as part of the development plan process providing the opportunity to members of the public to identify suitable structures for inclusion on the RPS that may not have already been brought to the attention of the Council. In this regard, there are 30 proposed additions to the RPS however, no new structures have been identified for inclusion in Labasheeda.

Scenic Routes

In relation to the query as to why Kilkerrin Peninsula is not included on Map 4B Areas of Special Control, this is because it is not a designated Scenic Route. I note that there is a Designated Scenic Route along the R473 from outside Labasheeda to the T-junction before Kiladysert. Designated Scenic Routes are indicated on Map 14A in Chapter 14 Landscape of the Draft Plan and listed in Appendix 5 Scenic Routes, and are identified in detail on the maps contained in Volume 2 of the Draft Plan.

Community Facilities

In relation to the provision of new community infrastructure in the village and the improvement of existing services, the Labasheeda Settlement Plan in Volume 3(d) of the Draft Plan, contains a number of general objectives to encourage development in Labasheeda in order to sustain and increase the population in the area and increase the number of services; to encourage the further development of retail and commercial services in the village core. The redevelopment of existing unused or derelict structures for retail or commercial purposes will be particularly encouraged; and to support the development of tourism in the village including ecological and marine based activities around the harbour.

Sewerage and Wastewater Treatment

I note the disappointment expressed in the submission in relation wastewater treatment in the village and I recognize that many settlements in the county, including Labasheeda, have not been in a position to fulfil their role due to deficiencies in wastewater services. In this regard, the provision and delivery of new and upgraded wastewater treatment infrastructure within the County is determined and prioritised by Irish Water, however as stated in Objective CDP11.32 of the Draft Plan the Council will advocate for the on-going provision, conservation and upgrade of wastewater treatment infrastructure in the County;

Derelict Sites

In relation to the request for audit of derelict sites and support for owners to bring these properties back into use, I note that Derelict sites throughout the County are listed in the Derelict Sites Register. In addition, the Draft Plan contains policies and objectives for derelict sites including Objective CDP17.10, in Chapter 17, which expresses the Council's commitment to using all mechanisms available to it as appropriate and to work with Derelict Site owners to identify opportunities to bring derelict sites back in to use. Such mechanisms include the use of the Derelict Sites Act 1990 where appropriate to require owners to carry out suitable improvements, and to acquire properties which are appropriate to the Council's Capital Programme in order to carry out improvements to derelict sites and revitalise the surrounding areas.

Broadband

I note concerns raised in the submission that the lack of broadband in some areas will impact on opportunities for remote working and blended working. In this regard, the Clare Digital Hub Network and the advances in broadband provision across the county are assisting in facilitating this shift to remote working and the hybrid (part home, part office) working model. The Draft Plan recognizes that the rollout of the National Broadband Plan is essential for the rural areas of County Clare and includes policies and objectives to aid the delivery of broadband across the county and enable opportunities for remote/blended working.

Amongst these are Objective CDP6.23, in Chapter 6, to engage with all relevant stakeholders and broadband infrastructure providers to ensure the roll-out of the National Broadband Plan as well as to support improvements to existing broadband networks, and CDP11.53 Broadband Connectivity, in Chapter 11, to support and facilitate the delivery of the National Broadband Plan and high-capacity ICT infrastructure to all locations across the County.

Artisan and Craft Industry

Chapter 6 Economic Development and Enterprise of the Draft Plan contains a number of policies and objectives to support businesses such as artisan food producers and craft industries. For example Section 6.22 and its associated Objective CDP6.21 supports the development of food networks throughout the County in order to support the expansion of the food industry and Section 6.23 Craft/Creative Industries and its associated Objective CDP6.22 identifies the Council's commitment to work in coordination with Local Enterprise Office Clare and all relevant stakeholders to support the further development and expansion of craft industries in County Clare and to proactively seek new market opportunities for locally produced crafts at the local, national and international levels.

Evening / Late Night Events

Chapter 9 Tourism of the Draft Plan contains policies and objectives to support local events such as the Dan Furey Set Dancing weekend and the Estuary Sessions. Section 9.2.16 Festivals and Events recognises that festivals can be a key driver of local economies and a means of revitalising and maintaining local culture. Clare's long history of hospitality is noted as well as its record of hosting 150 festivals and events annually. The associated Objective CDP9.15 identifies the Council's commitment to supporting and promoting existing festivals and cultural events and facilitating the establishment of new events as well as its commitment to supporting community groups and festival committees to identify and access new sources of funding for festivals and events in the County.

Natural Heritage Areas

In relation to financial support for habitat restoration in Natural Heritage Areas (NHAs), it is not within the scope of the county development plan to provide such funding. However, the Draft Plan contains policies and objectives in relation to the protection of NHAs and other important environmental designations. In this regard, Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure contains Objective CDP15.5 to actively promote the conservation and protection of areas designated as NHA's (including proposed sites). In addition, Objective CDP15.7 expresses the Council's commitment to work with local communities, landowners, the National Parks and Wildlife Service and other relevant parties to protect, manage where appropriate, enhance and promote sites of ecological importance across the County Biodiversity, Natural Heritage and Green Infrastructure.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/223 –Cllr Cillian Murphy	
Relevant Chapters / Topics	• **Chapter 3 Core Strategy** • **Chapter 5 Housing – Traveller Accommodation** • **Chapter 6 Economic Development – Strategic Aims, Food Industry & Tourism Development** • **Chapter 7 Retail - Tourism related Retail Development** • **Chapter 8 Rural Development and Natural Resources – Economic Development in Rural Areas & Rural Transport** • **Chapter 9 Tourism** • **Chapter 10 Sustainable Communities** • **Chapter 11 Physical Infrastructure etc** • **Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure** • **Chapter 16 Architectural and Cultural Heritage** • **Chapter 17 Towns and Villages** • **Chapter 18 Design and Placemaking** • **Appendix 2 Indicative Land Use Zoning Matrix** • **Volume 5 Clare Renewable Energy Strategy** • **3D West Clare Municipal District Settlement Plans -Kilkee**
Summary of Issues Raised in Submission	
The submission makes a number of points/requests in relation to various Volumes and Chapters of the Draft Plan. No map has been included. <u>Core Strategy:</u> In light of the impact of Covid 19 on work and living patterns, the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) should be considered to be fundamentally flawed and out of date policy documents. The policy direction underpinning Our Rural Future: Rural Development Policy 2014-2022 and the recent Town Centre First Policy provides a contradiction to both the NPF and RSES which will lead to confusion for communities and agencies over the lifetime of this county development plan.	

Chapter 5 Housing

5.2.8 Traveller Accommodation

Include a specific objective to undertake an in depth, meaningful and Traveller led consultation in advance of the preparation of the next CCC Traveller Accommodation Programme which will be undertaken during the lifetime of this CDP.

Economic Development and Enterprise

6.1 Strategic Aims

Amend the wording of the strategic aim that seeks to *"facilitate the diversification of the county's rural economy…* this might be strengthened to '***ensure*** *the diversification of the county's rural economy…'*

Include a specific aim that seeks to '*diversify the economies of those coastal communities who have an unsustainable reliance on tourism as the principle economic driver.*'

6.22 The Food Industry

Amend text to include the craft beer and whiskey industry in Clare. There are a number of craft brewers, and a whiskey bonder operating in the County and specific acknowledgement and support should be referenced in the CDP.

Include two additional specific objectives under CDP 6.21, or extra standalone objectives, *"to support the development of the craft beer and whiskey industry in County Clare"* and *"to support the development of craft beer and/or whiskey based visitor experiences in County Clare."*

6.27 Tourism Development

Amend CDP 6.26 to read; *"to ensure the economic development of tourism aligns with the Town Centre First policy, and tourism developments are harnessed to create economically and socially vibrant towns and villages, through the enhancement of tourism and leisure amenities and through supporting the coordination and promotion of appropriate tourism initiatives in accordance with CDP Objective 3.1"*

Retail

7.5.3 Tourism related Retail Development

Amend CDP 7.19 to reflect the importance of ensuring our towns and villages, and the communities that live in them, are at the forefront of reaping the reward from tourism related commercial activity. The current wording, especially in light of the potential for CCC to take on ownership of the Shannon Heritage attractions, has the capacity to place CCC in direct competition/conflict with the economies of nearby settlements, with the consequential negative impact on their sustainability. If tourism is to deliver on its proposed role of creating local economic benefit, then having local authority owned and operated retail in out of town centres competing in the marketplace will be a clear conflict.

Amend the wording of CDP 7.19 to *"prioritise the delivery of new sustainable tourism related developments and initiatives, of appropriate scale, within existing settlements proximate to established attractions"*

Rural Development & Natural Resources

8.1 Strategic Aims

Make specific reference to the adoption of, and reference to, the Town Centre First Policy as a specific focus for all future rural developments under Strategic Aims. Regardless of which service directorate has responsibility of overseeing this policy, given the population size of the towns referenced within the policy document, >400 residents, the large majority of it will be delivered within rural Clare. This delivery needs to be referenced specifically as a strategic aim in the CDP under Rural Development.

8.2.2 Economic Development in Rural Areas

Include a specific reference to the adoption of, and reference to, the Town Centre First Policy for any rural economic developments under CDP 8.1.

8.2.7 Rural Transport

Include reference to planning for bus stops at, or as close as practicable, for all future new build or change of use planning applications for public buildings under CDP 8.6.

Tourism

9.1 Strategic Aims

Include as a strategic aim the increase in capacity of overnight accommodation in the county. We fall well below the capacity of Kerry and Galway, and are marginally better off than Limerick, the creation of new attractions and the taking in charge of existing ones by the local authority will only serve to fill hotel beds in other counties unless we begin to have a strategic focus on using them to build up our own capacity. This needs to be specifically noted in the strategic aims of tourism in our CDP.

9.2.1 Tourism Promotion

Include a specific reference to promotion that encourages long staying visitors be included as an objective of CDP 9.2. Suggested amendment to 9.2(a) To support Clare Tourism Task Force in the reactivation of the County as a tourism destination, with a particular focus on marketing and creating content to attract long staying visitors, and to support the on-going work in promoting County Clare".

9.2.2 Integrated Tourism Products

Amend the following in CDP 9.3(a) *"….. Particular emphasis will be placed on the integration of tourism attractions with accommodation and tourist services* ***that are located within the centres of proximate towns and villages.***

9.2.3 Tourism Developments and Tourist Facilities

Insert wording in CDP 9.4(b) that will clearly link tourism related developments outside of settlements with the economic and social sustainability of those nearby towns and villages, and to strengthen the need in this objective to demonstrate the local benefits of those developments.

Insert wording in CDP 9.4(d) or insert an extra objective, that includes monitoring protocols to measure the social impacts and community sentiment for visitor pressure to the county's natural, archaeological and built heritage assets.

9.2.4 Visitor Accommodation

Insert the following objective as CDP 9.5(d)

"To use those visitor assets within the ownership, or effective operational control, of Clare County Council to support the development of overnight accommodation in the County, ensuring those assets deliver as far as practicable, the aims of 'Our Rural Future: Rural Development Policy 2014-2022' and the 'Town Centre First Policy'."

9.2.18 Sustainable and Responsible Tourism

Insert the following as an added objective under 9.17:

"To develop and implement over the lifetime of this plan a set of community led, destination specific and locally relevant metrics that clearly demonstrate the economic, environmental and social impacts of tourism to the host communities in the County."

9.3.4 Tourism in North Clare and the Burren

Insert into CDP9.24 an added objective:

"to clearly link, in a measurable way, how the implementation of the Cliffs of Moher Strategy 2040 reflects the Town Centre First Policy to increase the viability, and social and economic sustainability, of the existing settlements in the wider Burren and North Clare area."

9.3.5 Tourism in West Clare

Insert the following objectives into CDP 9.25:

"To develop Kilkee as a best practice accessible destination for water based activities" in order to capitalise on the Failte Ireland outdoor water based activity centre proposed for Kilkee.

"To work with the arts community in Loop Head to further develop the existing thriving arts sector into a nationally recognised art destination".

The lack of serviced accommodation in Clare as whole is one of the primary reasons the County fails to fully benefit economically from the tourism sector. Prioritising the development of serviced overnight accommodation should be a priority for the rural development directorate, so I am proposing to either add to, or amend the wording in objective 9.25(g) from *"to support the enhancement of the tourist accommodation offer in Kilrush town"* to the following *" To prioritise the development of serviced overnight accommodation in West Clare".*

<u>Sustainable Communities</u>

10.1 Strategic Aims

Insert a specific and delivery focussed reference to the aims of the Town Centre First Policy as a standalone strategic aim for sustainable communities.

Include reference to sustainable and diversified economic drivers in communities.

10.2 Sustainable and Inclusive Communities

Include reference to Changing Places in CDP 10.1(b) and/or within any other relevant CDP as may be appropriate, including CDP 10.6 and 10.7.

10.4 Social and Community Engagement

Add the word 'Development' into CDP 10.3(a) to read; *"To actively engage with the Clare Public Participation Network in the **development**, preparation and implementation…*

Physical Development, Environment and Energy

Bus Transport

Include an objective in CDP11.8 that any new public building, or change of use, planning application by a public body includes a requirement for a bus stop in close proximity.

11.2.14 Ports, Jetties, Harbours, Quays and Piers

Include the following objective under CDP 11.22:

"to further develop the pier at Carrigaholt in order to service the future developments in the offshore renewable energy sector"

Renewable Energy Sources 11.8.5

Add the following objective under CDP 11.47:

"To prioritise the development of community owned energy developments"

Reword CDP 11.47(c) to read *"To **consider** the development of renewable wind energy…"* the remaining lands considered suitable for onshore wind energy developments are closer to larger clusters of homes, and to settlements, they are likely to be far more contentious and there should not be such strongly worded support for these projects in Draft Plan.

Given the lack of current appropriate guidance on wind energy developments, current policy dates from 2006, is hopelessly out of date and no longer relevant, therefore the construction of any new wind turbines should not be considered within a minimum distance of 750m from any home.

Biodiversity, Natural Heritage and Green Infrastructure

15.2.10 Promoting and Protecting Biodiversity and Wildlife Corridors

Insert an objective in CDP 15.12 to read; "*to develop and implement, within the lifetime of this plan, a biodiversity friendly hedgerow cutting guidance policy document".* Guidance for such a policy already exists with Teagasc https://www.teagasc.ie/media/website/publications/2009/routine_mechanical_hedge_cutting.pdf If this is not the most suitable place for such an objective, maybe CDP 15.19 may be more appropriate.

Architectural, Archaeological and Cultural Heritage

16.5.3 Oidhreacht Theanga: Linguistic Heritage

To insert an objective under CDP16.17 *"to support the development of Colaiste Ui Chomhraidhe in Carrigaholt as a residential educational facility focussing on the Irish language, culture and heritage"*

Towns and Villages

17.1 Strategic Aims

Include as a strategic aim *"the development of a cross directorate working group to ensure*

delivery of the national Town Centre First Policy" it is critical to its success that this is seen and is clearly elucidated as an organisational aim, rather than a service delivery goal.

Include addressing rural depopulation and tackling vacancy in our towns and villages as a strategic aim, addressing this issue goes to the very sustainability of our communities.

17.2.2 Town and Village Centre Vibrancy

In order to ensure the roll out of the national Town Centre First policy is undertaken in manner that will see the local authority and the communities of Clare make the most of the opportunities it presents, the objective in CDP 17.1 could be strengthened as follows:

"To prioritise the delivery of the Town Centre First Policy across Clare to support the development and coordination of regeneration, revitalisation, and growth in vibrancy of our towns and villages".

17.2.3 Town and Village Improvement Strategies

Include as an objective the updating of '*Towards a Better Kilkee…'* before the end of the current strategy.

17.2.4 Town Teams

To place a higher emphasis in CDP 17.4 on the roll out of Town Teams across other towns and villages in the settlement hierarchy

17.2.8 Addressing Depopulation

Depopulation is the existential crisis facing rural communities, particularly in West and North Clare, addressing vacancy and dereliction are two key factors in providing possible solutions. This objective needs to be far more forceful in its wording to provide the relevant policy backup for the local authority in addressing the issue.

<u>Design and Placemaking</u>

18.3.6 Universal Design

Include reference to "Changing Places' facilities in CDP 18.4.

<u>Appendix 2 Indicative Land Use Zoning Matrix</u>

Amend the 'Caravan Park/Camp Site/Motor Home (Tourist uses) Glamping" land use from being "open to consideration" in both 'Existing Residential' and 'Residential' Zonings and 'will normally be acceptable in principle" under Low Density Residential to 'Will not normally be acceptable"

These types of tourism developments do not sit well within residential areas. While there are legacy sites that will continue to operate as usual, new be facilitating, or seen to be open to facilitating, any new ones in residential areas in the future. It is a commercial activity and should be restricted to land zoned for that purpose. It also has possible consequences with regards to quantity of land zoned for residential purposes given the restrictions around population targets and housing allocations, and could also impact service capacity, especially water services and wastewater treatment, where permitting this type of development on residential zoned land reduces the capacity for permanent dwellings to be permitted.

Clare Renewable Energy Strategy

Vision

Include reference to balancing community impact with economic development in the vision statement. While there is reference to balanced social and economic development its important, given the proximity the next phases of these developments will have to larger populations, we acknowledge explicitly the impact renewable energy developments have on an increasing amount of our community members.

1.1 Strategic Aims

Amend strategic aim (d) to the following: *"To maximise the opportunities for renewable energy development while prioritising the protection of the environment and existing residential amenities."*

Add in a further strategic aim: *"to prioritise the development of community owned renewable energy projects"*

3.2 County Clare Energy Needs

With regard to proposed energy consumption use in Table 3, I would question how we see a reduction in electrical consumption up to 2030 and beyond, given the increasing electrification of our domestic, commercial, industrial, agricultural and transport sectors.

4.1 RES Objective

Include reference to a stronger commitment to protecting existing residential amenities in the drive to facilitate the achievement of our renewable energy targets.

Kilkee Settlement Plan

General Objectives

Insert a commitment to update to the strategic document "Towards a Better Kilkee" in advance of its expiry date of 2024.

Chief Executive's Response

I would like to thank Cllr Cillian Murphy for the submission which relates to a number of items as follows:

Core Strategy

I note the comments made in the submission in relation to national and regional policy. However, and as noted in the submission, the county development plan must adhere to both national and regional policy.

Chapter 5 Housing

5.2.8 Traveller Accommodation

Under the Housing (Traveller Accommodation) Act, 1998 Clare County Council must prepare and have adopted a programme of Traveller accommodation in their area. The Council is also required under the Act to provide for an extensive public notification and consultation process

as part of the preparation of their Traveller Accommodation Programme. Therefore, I do not consider it is necessary to include a specific objective for same.

Economic Development and Enterprise

6.1 Strategic Aims

While I acknowledge the request to amend the wording of the strategic aim that seeks to "facilitate the diversification of the county's rural economy…" in order to strengthen it, I consider it is not possible for the Council to 'ensure' the diversification of the county's rural economy. It is the role of the Council to facilitate such aims using all mechanisms available to it including through the policies and objectives of the county development plan.

In relation to the request to include a specific aim in relation to diversifying the economies coastal communities who have an unsustainable reliance on tourism, I do not consider this is necessary. The Draft Plan contains numerous policies and objectives aimed at supporting the diversification of economies of coastal communities including support for fishing and aquaculture, food industry, niche markets, home based business opportunities etc. In addition, the need to create a diverse range of employment opportunities to guard against overreliance on a single sector is specifically stated on page 2, West Clare Municipal District, of the 3(d) West Clare Municipal District Settlement Plans and in this regard, varying objectives are included within the individual Settlement Plans, for example Kilkee, Ballyvaughan and Doonbeg, to encourage developments that will provide services for both visitors to the area and the local population in order to generate year-round activity and employment in the area.

6.22 The Food Industry

In relation to the request to amend text under this section to include the craft beer and whiskey industry in Clare, Section 9.2.12 Arts, Crafts and Food Tourism makes specific reference to the establishment of a number of craft breweries and local distilleries in the county which attract many visitors each year, and its associated Objective CDP9.11 supports the development of the arts, crafts and food tourism sectors and work in coordination with relevant stakeholders to facilitate growth in these sectors. Therefore, I do not consider there is a need to amend Section 6.22 or it associated objective.

6.27 Tourism Development

In relation to the request to amend the text of Objective CDP 6.26 to ensure the economic development of tourism aligns with the Town Centre First policy, I do not consider this is necessary. The Draft Plan includes policies and objectives, including Section 17.2.1 Town Centre First, 17.2.2 Town and Village Centre Vibrancy and Objective CDP17.1, which recognize and support a town centre first approach to development in the County, including tourism development.

Retail

7.5.3 Tourism related Retail Development

In relation to the request to amend Objective CDP 7.19 to reflect the importance of ensuring our towns and villages benefit from tourism related activities, I note that while the favourable consideration of tourist-related retail developments in settlements is clearly stated in the text under Section 7.5.3, this is not reflected in the associated Objective CDP7.19. Therefore, I consider this Objective should be amended to include reference to same.

Rural Development & Natural Resources

8.1 Strategic Aims & 8.2.2 Economic Development in Rural Areas

I note the points made in the submission requesting inclusion of a Strategic Aim and Objective referring to the Town Centre First Policy for rural economic developments, however, I do not consider this is necessary as specific reference to same is included in Section 17.2.1 Town Centre First, Chapter 17 Towns and Villages of the Draft Plan.

8.2.7 Rural Transport

I agree that infrastructure such as bus stops are very important to supporting the use of public transport and I am satisfied that this is addressed in Objective CDP11.8 Bus Services.

Tourism

9.1 Strategic Aims

I note the points made in the submission highlighting the importance of ensuring adequate visitor accommodation in the County. I am satisfied that this is addressed in the Strategic Aim included in Chapter 9 Tourism of the Draft Plan, to develop and enhance new and existing tourism products, attractions and tourism Infrastructure, which would include to increase overnight capacity, and to increase the length of tourist stay and 'yield per visitor' in the County.

9.2.1 Tourism Promotion

Having regard to the Strategic Aim already included in Chapter 9 of the Draft Plan to increase the length of tourist stay and 'yield per visitor' in the County, I am satisfied that further reference is not necessary in Objective CDP9.2.

9.2.2 Integrated Tourism Products

I acknowledge the importance of ensuring that our towns and villages benefit from tourism related activities and I consider that it is appropriate to amend Objective CDP9.3(a) to include reference to same.

9.2.3 Tourism Developments and Tourist Facilities

While I acknowledge the points made in the submission, I am satisfied that Objective CDP9.4(b) sets out clear parameters in permitting tourism related development outside of settlements including the identification of a clear need for the location and benefits to the local community (to be balance with any potential environmental impact). In relation to the requested amendment to CDP9.4(d), I do not consider it appropriate to identify specific protocols within this objective, appropriate monitoring protocols will be identified in tandem the relevant authorities.

9.2.4 Visitor Accommodation

While I agree that there may be an opportunity to use visitor assets within the ownership/control of the Council to support the development of overnight accommodation, I do not consider it is necessary or appropriate to include an objective for same in the county development plan.

9.2.18 Sustainable and Responsible Tourism

The development and implementation of a set of community led, destination specific and locally relevant metrics which demonstrate the economic, environmental and social impacts of tourism

on communities would be of great benefit to the county, this may be difficult to achieve due to limited resources within the Council. Therefore, I do not consider it appropriate to include the requested objective.

9.3.4 Tourism in North Clare and the Burren

The Cliffs of Moher Strategy 2040 is currently being prepared. I note that public consultation was recently sought on the Draft Strategy and I consider that engagement in that process is the appropriate mechanism to ensure that the Strategy appropriately reflects Town Centre First Policy and highlight the needs the existing settlements in the wider Burren and North Clare area.

9.3.5 Tourism in West Clare

I note the general objective in the Kilkee Settlement Statement, Volume 3(d) of the Draft Plan, to support the designation of Kilkee as a Centre of Excellence for scuba diving and water-based sports.

In relation to the development of the Arts community in Loop Head, the Draft Plan includes policies and objectives, in particular in Chapter 9 Tourism and Chapter 10 Sustainable Communities, to support the continued development of the Arts sector in the County including Loop Head.

I note the points made in the submission highlighting the importance of ensuring adequate visitor accommodation in the County, including in West Clare. I am satisfied that this is addressed within the policies and objectives contained in the Draft Plan as highlighted in the Strategic Aim included in Chapter 9 Tourism, to develop and enhance new and existing tourism products, attractions and tourism Infrastructure, which would include to increase overnight capacity, and to increase the length of tourist stay and 'yield per visitor' in the County.

Having regard to the above, I do not consider it is necessary to include additional objectives or amend existing objectives as requested in the submission.

<u>Sustainable Communities</u>

10.1 Strategic Aims

Town Centre First Policy is specifically referenced in Section 17.2.1 and a town centre first approach to development is recognized and supported throughout the Draft Plan including in Section 17.2.2 Town and Village Centre Vibrancy and Objective CDP17.1. In relation to sustainable and diversified economic drivers in communities, the Draft Plan contains numerous references to sustainability and diversity including in Chapter 6 Economic Development and Enterprise which contains the Strategic Aim to facilitate the diversification of the County's rural economy; and notes the importance of ensuring each settlement in the County achieves its economic potential and that there is balanced and sustainable growth across County Clare.

10.2 Sustainable and Inclusive Communities

I acknowledge the need for Changing Places particularly in coastal communities, and I am satisfied that this is addressed in Objective CDP 10.1(b) To work in collaboration with all relevant stakeholders to facilitate the planning and delivery of accessible community facilities throughout the County.

10.4 Social and Community Engagement

I am satisfied that Objective CDP10.3 is adequately worded, therefore I do not consider it is necessary to amend it as outlined in the submission.

Physical Development, Environment and Energy

Bus Transport

I agree that infrastructure such as bus stops are very important to supporting the use of public transport and I am satisfied that this is addressed in Objective CDP11.8 Bus Services.

11.2.14 Ports, Jetties, Harbours, Quays and Piers

In relation to the potential to further develop the pier at Carrigaholt to service the future developments in the offshore renewable energy sector, the Carrigaholt Settlement Statement includes general objectives to support the development of new commercial/recreation and leisure activities as well as to facilitate the extension and/or upgrade of the facilities in place at MAR1 in line with Strategic Infrastructural Framework Plan (SIFP), which I am satisfied could potentially service the offshore renewable energy sector.

Renewable Energy Sources 11.8.5

I agree that there is a need to encourage community owned energy developments in order to meet renewable energy targets, reduce CO2 and promote the move to a low carbon economy and I am satisfied that this is addressed in Objective CDP11.47 Renewable Energy. In relation to the request to reword CDP 11.47(c) "*To **consider** the development of renewable wind energy…",* I am satisfied that the current wording "*To support the sustainable development of renewable wind energy…*" is appropriate.

I note the concerns that are raised in this submission in relation to current wind energy policy and the request that new wind turbines should not be considered within a minimum distance of 750m from any home. In this regard, it is essential that any county-level strategy, including the county development plan, is in line with higher national and regional strategies to ensure that conflicts between the strategies do not arise. An updated wind energy strategy will be prepared when the new national-level guidelines are available to the Council. In the interim, local authorities are obliged by Department of Environment, Community and Local Government Circular PL20-13, to delay the reviewing of their Wind Energy Strategies, which includes the Clare Wind Energy Strategy contained in Volume 6 of the Draft Plan.

Biodiversity, Natural Heritage and Green Infrastructure

15.2.10 Promoting and Protecting Biodiversity and Wildlife Corridors

I agree that the development and implementation of a biodiversity friendly guidance document would be of great benefit to the county as well as the Council itself, however this may be difficult to achieve due to limited resources within the Council. Therefore, I do not consider it appropriate to include as an objective in the new plan.

Architectural, Archaeological and Cultural Heritage

16.5.3 Oidhreacht Theanga: Linguistic Heritage

The Carrigaholt Settlement Statement in Volume 3(d) of the Draft Plan recognises Coláiste Uí Chomhraidhe as a valuable resource in the community and in this regard a general objective is including in the plan to support services and facilities that are complementary to the use of

Coláiste Eoghain Uí Chomhraidhe. Therefore, I do not consider an additional objective is required under Objective CDP16.17 as requested.

Towns and Villages

17.1 Strategic Aims

While I note the points made in the submission, I consider the development of a cross directorate working group within the Council for delivery of the national Town Centre First Policy is an operational matter. Therefore, I do not consider it appropriate or necessary to include a strategic aim as requested in the submission.

The Draft Plan contains numerous policies and objectives to address depopulation and vacancy, in particular Chapter 17 Town and Villages, for example Section 17.2.7 Addressing Vacancy and its associated Objective 17.7 and Section 17.2.7 Addressing Depopulation and its associated Objective CDP17.8. Therefore, while I note the concerns outlined in the submission, I am satisfied that these issues are addressed in Draft Plan.

17.2.2 Town and Village Centre Vibrancy

While I note the points made in the submission, I am satisfied that Objective CDP17.1 is adequately worded, therefore I do not consider it is necessary to amend it as outlined in the submission.

17.2.3 Town and Village Improvement Strategies

It is envisaged that a Town Centre First (TCF) Masterplan will be prepared for Kilkee. A TCF Masterplan is currently underway for Sixmilebridge. The locations and programming of further TCF Masterplans have not been identified to date, but once identified these will be brought before Elected Members as part of the consultative process.

17.2.4 Town Teams

Section 17.2.4 emphasizes the work of Town Teams including the potential to assist in the

appropriate consolidation, renewal and regeneration of settlement centres. Objective CDP 17.4 expresses the Council's commitment to work with established Town Teams in the county as well as those yet to be established. In relation to the roll out of Town Teams in the County, the delivery of same sits more appropriately within Clare Local Development Committee's Local Enterprise and Community Plan.

17.2.8 Addressing Depopulation

The Draft Plan contains numerous policies and objectives to address depopulation and vacancy, in particular Chapter 17 Town and Villages, for example Section 17.2.7 Addressing Vacancy and its associated Objective 17.7 and Section 17.2.7 Addressing Depopulation and its associated Objective CDP17.8. Therefore, while I note the concerns outlined in the submission, I am satisfied that these issues are addressed in Draft Plan.

Design and Placemaking

18.3.6 Universal Design

I acknowledge the need for Changing Places particularly in coastal communities and I am satisfied that this is addressed in Objective CDP 10.1(b), Section 10.2 Sustainable and Inclusive Communities, Volume 1 of the Draft Plan.

Appendix 2 Indicative Land Use Zoning Matrix

Having considered the points made in the submission including residential zoned land requirements to accommodate population targets over the period of the plan, I consider a Caravan Park/Camp Site/Motor Home (Tourist uses) Glamping use should not be permitted on lands zoned Residential or Low Density Residential. I consider such uses should be open for consideration on Existing Residential lands in order to provide for flexibility in certain instances, for example in the case of larger vacant or derelict sites or buildings.

Clare Renewable Energy Strategy (RES)

Vision

While I acknowledge the points made in the submission, I am satisfied that the need to balance community impact with economic development is adequately highlighted throughout the Renewable Energy Strategy document.

1.1 Strategic Aims

While I acknowledge the points made in the submission, I am satisfied that the current wording of strategic aim (d) which 'safeguards' the *environment and existing residential amenities* is appropriate. In addition, I am satisfied that the development of community is appropriately supported within the RES document in particular objectives contained in Section 18.7. The Strategic Aims set out in Chapter 1 are overarching aims relating to all sectors identified in the overall Strategy, Strategic Aims for Community Energy are contained in Chapter 18. I do not consider an additional strategic aim is required in this regard.

Having regard to the above, I do not consider it is necessary to amend existing objectives or to include additional objectives as requested in the submission.

3.2 County Clare Energy Needs

In the submission, the reduction in electrical consumption up to 2030 in 'Table 3' is queried, however there is no Table 3 in the RES. In addition, while Table 3.3 County Clare - Evolution of Energy Use by Fuel Source contains figures for electricity consumption up to 2030, this table shows electrical consumption increasing up to 2030 not reducing as noted in the submission.

4.1 RES Objective

Include reference to a stronger commitment to protecting existing residential amenities in the drive to facilitate the achievement of our renewable energy targets.

While I acknowledge the points made in the submission, I am satisfied that strategic aims and objectives contained in the RES express the Council's commitment to protecting residential amenities of communities in County Clare.

Kilkee Settlement Plan

General Objectives

It is envisaged that a Town Centre First (TCF) Masterplan will be prepared for Kilkee. A TCF Masterplan is currently underway for Sixmilebridge. The locations and programming of further TCF Masterplans have not been identified to date, but once identified these will be brought before Elected Members as part of the consultative process. Having regard to the above, I consider it is necessary to include reference to same within the Draft Plan.

Chief Executive's Recommendation

I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029:

Objective CDP 7.19 in Chapter 7, Volume 1 – amend point to read:

To encourage and facilitate the delivery of sustainable tourism-related retail developments and initiatives, of appropriate scale, located in the vicinity of established tourism attractions including within nearby settlements.

Objective CDP 9.3(a) in Chapter 9, Volume 1 - amend point to read:

(a)To work with all relevant stakeholders to achieve an integrated and co-ordinated tourism product. Particular emphasis will be placed on the integration of tourism attractions with accommodation and tourist services in the wider community including those located in nearby town and village centres.

Section 17.2.1 Town Centre First in Chapter 17, Volume 1 – amend text as follows:

~~**17.2.1 Town Centre First**~~

~~In accordance with Our Rural Future, Rural Development Policy 2021 –2015 (Government of Ireland, 2021) a 'Town Centre First' approach encourages stakeholders, including local authorities and communities to put town centres at the heart of decision-making. The Governments 'Town Centre First' National Programme, will play a vital role in developing a co-ordinated, action led approach to town centre re-generation and re-vitalisation around the county, and in recovering from the effects of the Pandemic. Town and village consolidation, renewal and regeneration requires both economic and physical inputs. Employment generating developments of varying scales in settlements make a significant contribution to their vibrancy and economic wellbeing.. In addition, an attractive physical environment and a high level of amenity is required to ensure that settlements are attractive locations to live, work and visit. Actions which assist in settlement renewal and regeneration include the improvement of the physical environment and appropriate land use zoning which in accordance with the NPF promotes compact growth and brownfield redevelopment.~~

17.2.1 Town Centre First

Our Rural Future, Rural Development Policy 2021-2015 (Government of Ireland, 2021) outlines a vision to support the regeneration and development of rural towns and villages to contribute to local and national economic recovery, and to enable people to live and work in a vibrant environment. The Town Centre First policy, launched in February 2022, is central to this vision. Town Centre First represents a new approach to the development of our towns where local communities and local businesses can be central to reimagining their own towns and planning their own futures. Every town is different. Each town is unique and requires unique solutions to the challenges and opportunities they face. The Town Centre First policy aims to create town centres that function as viable, vibrant and attractive locations for people to live, work and visit, while also functioning as the service, social, cultural and recreational hub for the local community. The Town Centre First policy document includes a series of key priorities and actions which collectively will create framework to support towns to achieve the desired outcomes and deliver on their own unique vision.

As a first step, a pilot scheme to develop Town Centre Masterplans for selected towns across the country. including Sixmilebridge in County Clare, has been initiated. Funding has been provided for the delivery of these masterplans and it is envisaged that they will provide a vision for the development of the town, building buy-in from existing property owners and local communities. The masterplans will include a detailed study of the area and will identify key projects/actions to further the realisation of the vision. The masterplans will subsequently provide a basis for the town to seek support from multiple funding streams, including Rural Regeneration and Development Fund and Town & Village Renewal Scheme, will help to maximise State investment, and will offer an opportunity for the delivery of a co-ordinated programme of investment for an area, rather than funding being sought and spent on individual projects on an ad-hoc basis.

The Town Centre First Masterplan is currently underway for Sixmilebridge, with locations and programming of further Town Centre First Masterplans to be identified at a future date.

Under Place Making and Regeneration in the Sixmilebridge Settlement Statement, Volume 3(b) - include text and objective as follows:

The Town Centre First policy, launched in February 2022, is central to this vision. Town Centre First represents a new approach to the development of our towns where local communities and local businesses can be central to reimagining their own towns and planning their own futures. A pilot scheme to develop Town Centre Masterplans for selected towns across the country, including Sixmilebridge, has been initiated. The Town Centre First Masterplan is currently underway for Sixmilebridge and is due to be completed by June 2023.

It is an objective of Clare County Council:

- To prepare and support the implementation of a Town Centre First Masterplan for Sixmilebridge

Submission No: S2/510 –Local Concerned Citizen's Group (Mount Callan)	
Relevant Chapters / Topics	• **Windfarms** • **Renewable Energy** • **West Clare**

Summary of Issues Raised in Submission

This submission relates to windfarms and the proposal for a Piped-Hydro Electric Storage (PHES) facility on Mount Callan.

Windfarms

- Danger of becoming saturated.
- Being sited or proposed in scenic and areas of conservation.
- Danger of future land slippages (eg Derrybrien).
- Noise pollution can lead to illnesses.
- Causes division in communities.
- Local community have to live with consequences and bottom line is financial gain.

PHES (Slieve Callan)

- Noise pollution during works and for years after.
- Character of area will be changed and quality of life affected.
- In an area of scenic, natural and tourist interest.
- Landslide occurred in 1901 and this would increase the risk of it happening again.

Chief Executive's Response

I thank the Local Concerned Citizen's Group (Mount Callan) for the submission.

The analysis carried out for the draft Renewable Energy Strategy (RES) follows the SEAI LARES methodology, and as a result is concerned with the high-level strategic mapping for the County and is not intended to provide the same degree of accuracy or detail as the research expected for a site-specific project, and therefore comment on the specific merits/characteristics of an individual site, for example in relation to proximity to housing, or in relation to ecological sensitivity, is beyond the scope of the draft RES. General safeguards on amenity and environmental protection are included in Section 17 of the draft RES.

I acknowledge the concerns over potential landslides and aviation safety associated with windfarm development. The development management process requires the highest standards of community and environmental protection.

The new Wind Energy Development Guidelines should establish clearer guidance to facilitate the achievement of wider renewable energy targets while considering community, spatial planning, energy policy, environmental, technological and industry issues that need to be balanced. It focuses on several key aspects including sound and

noise, visual amenity setback, shadow flicker, consultation obligations, community dividends, and grid connections. Once finalised, the revised Wind Energy Development Guidelines will be issued under Section 28 of the Planning and Development Act 2000, as amended, and will apply to planning applications and considerations for future wind energy development proposals.

The installation of Pumped HydroElectric Scheme (PHES), a mature and large energy storage technique, is dependent on specific geological formations, and thus is a rare opportunity. The proposed site of PHES at Slieve Callan was the outcome following a detailed study of the geographical and physical potential for PHES through the SEA and AA processes. Whilst PHES development has not advanced in Ireland in the past decade, any individual proposed development in the area would be subject to examination through the development management and environmental assessment processes.

Chief Executive's Recommendation

I recommend that there is not amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/514 –FuturEnergy Ireland	
Relevant Chapters / Topics	• **Renewable Energy** • **Wind Energy Strategy**

Summary of Issues Raised in Submission

This submission relates to the following:

Onshore Wind

- It is a critical form of infrastructure which is essential to address our climate and energy security crises.
- Climate Action Plan (CAP) 2021 requires 80% of our electricity to come from renewable sources by 2030 comprising up to 8,000MW of onshore wind.
- FEI is currently targeting the delivery of 1,000MW of new onshore wind projects largely enabled by Coillte lands.
- There is a strong policy signal that renewable energy ambition levels will continue to increase of the course of the decade and that onshore wind will continue to have the vital leading role.

Wind Energy Strategy (WES)

- Requests a clear policy objective is added to the Plan to ensure that the WES is reviewed once the National Wind Energy Guidelines are issued.
- Objective RES 4.1 is noted and welcomed to facilitate the achievement of the renewable energy targets.
- Further note that 550MW is stated as a minimum target in current WES, Section 3.1, Appendix 6.
- Believe that, based on 550MW target, the current WES can continue to facilitate onshore wind successfully.

Energy Storage

- Welcomes inclusion of section 15 of the RES and believe that energy storage technology is critical to ensuring our energy future.
- Welcomes objective 15.1 which weeks to facilitate forms of energy storage that improve overall electricity grid stability.
- Welcomes objective 15.3 which proposes to examine in planning applications how energy storage systems such as batteries will be safety managed and recycled.

Community and Economic Development

- Wind energy is of strategic importance in addressing climate change, growth the economy and providing employment opportunities.
- Therefore supportive of objective RES 18.3 which encourages developers to carry out community consultation.

Working Partnership on Wind Projects

- The scale of the overall Climate Action Plan is substantial and requires considerable collaboration between all parties.

Chief Executive's Response

I thank FuturEnergy Ireland for the submission.

Regarding on-shore wind it is acknowledged that the deployment of onshore renewable energy technologies represents a quicker method of achieving our national renewable energy targets in the short-to-medium term. Offshore renewable energy intends to secure Ireland's energy requirements in the long term and the focus during this plan period will be to support the development of the on-shore service infrastructure in preparation for when the time comes for the delivery of off-shore installations. County Clare has established a minimum target of 550MW of renewable energy from onshore wind sources, as set out in the current Clare Wind Energy Strategy.

I note in both the draft RES and Volume 1 Written Statement of the draft Plan there is a commitment through policy support to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, upon the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. This is set out in Volume1, Chapter 11 Physical Infrastructure, Environment and Energy, Objective CDP11.47 Renewable Energy, specifically "d) To prepare a new and updated Wind Energy Strategy for County Clare during the lifetime of this plan, subject to the publication of the update to the *Wind Energy Development Guidelines for Planning Authorities 2006".*

Energy storage systems are critical to improving the energy security and resilience of Ireland's grid. Circular economy principles and the whole life cycle of materials guide Clare County Council's procurement and waste management.

The creation of a low carbon economy is essential to ensure that County Clare remains an attractive place in which to live and do business. Developing and servicing the low carbon economy infrastructure provides opportunities for local communities in terms of employment, reduce cost of living, increased local authority rates contributions, and the provision of educational amenities.

Chief Executive's Recommendation

I recommend there is no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submissions.

Submission No: S2/519 –Sean Fitzgerald	
Relevant Chapters / Topics	• **Shannon Rail Link**

Summary of Issues Raised in Submission

This submission relates to the Cratloe area and the proposed railway track through Rosmanager on Bunratty side of river.

- This is a flood plain.
- There is no proposed rail link to Sixmilebridge despite its increasing population and number of people commuting to Shannon.
- Distrance from Cratloe to Ballycar is far greater than from Sixmilebridge to Bunratty and Shannon.
- Site for proposed railway station in Cratloe is on a dangerous stretch of road. Could it be located near Portrine flyover?
- Suggests a rail link from Sixmilebridge or from rail line between Sixmilebridge and Ballycar to Bunratty.
- Suggest a walking or cycle track along with a rail track.

Chief Executive's Response

I thank Seán Fitzgerald for the submission and address the issues raised below.

An Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the draft Plan, and is shown on the Settlement Plan maps (where applicable) and on the county-wide 'Infrastructure, Environment and Flood Risk Zone' maps. The alignment has been included over previous successive County Development Plans.

The mapped alignment corresponds with that of the Shannon Rail Link Feasibility Study, which identified the preferred route for a rail link between the national rail network and Shannon Airport. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region.

Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

The draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) is a cross-county Metropolitan scale document which sets out the policies and objectives of the National Transport Authority, Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland at a level appropriate to that scale. The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the Limerick Shannon Metropolitan Area (LSMA).

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:

- In cooperation with the Southern Regional Assembly and the local authorities, seek to develop land use policies for implementation via the RSES and Development Plans which focus development in the LSMA, and the wider region, on the rail network in order to deliver Transit-Oriented Development and support further investment in suburban rail; and
- Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new stations at appropriate locations integrated with high density Transit-Oriented Development.

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, it is clear that linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

Therefore, the rationale for retaining the Infrastructure Safeguard (Rail) as mapped in the draft CDP is that it has safeguarded lands for rail connections from Shannon to the existing Limerick-Ennis railway, and that infrastructure for rail travel from Shannon to both Galway and Limerick will continue to be safeguarded.

The draft CDP includes a written objective (CDP 11.7) for the Shannon Rail Link, which concerns the section of the Shannon Rail Link infrastructural safeguard extending from Hurlers Cross to Shannon International Airport, i.e. not the entirety of the safeguarded alignments mapped in the draft CDP. Having regard to the submissions received from transport organisations and the general public, I consider that it is more appropriate to ensure that the intended review referred to in CDP 11.7 would take account of the entirety of the safeguarded alignments mapped in the Shannon Rail Link Feasibility Study and draft CDP. The intended review will seek to address the potential impacts that are highlighted in the submission.

Chief Executive's Recommendation

I recommend that Chapter 11, Section 11.2.6 Public Transport is amended as follows:

Shannon Rail Link

An ~~undefined infrastructure safeguard~~ Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the Plan in line with the *Shannon Rail Link Feasibility Study* ~~consistent with the Government's objective of achieving balanced regional development, and the infrastructural requirements as identified in the *RSES*~~. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region. Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

Clare County Council will work in conjunction with the NTA, Irish Rail and other relevant stakeholders to carry out a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard extending from ~~Hurlers Cross to~~ the existing Limerick-Galway railway line to Shannon International Airport. This review will include a route assessment to identify a preferred alignment for a potential rail line serving Shannon International Airport, Shannon Free Zone and Shannon Town. The N19 National Road and the ~~undefined~~ infrastructural safeguard of the proposed Shannon Rail Link are located in close proximity. The delivery of the N19 National Road upgrade is a priority of Clare County Council and should take precedence over other infrastructural projects along its route delivering on the significant exchequer investment already made in scheme planning and design.

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:

> Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new stations at appropriate locations integrated with high density Transit-Oriented Development.

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

I recommend that Policy Objective CDP 11.7 is amended, as follows:

Development Plan Objective: **Shannon Rail Link**	
CDP11.7	It is an objective of Clare County Council: a) To work in conjunction with the NTA, Irish Rail and other relevant stakeholders to carry out a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard extending from ~~Hurlers Cross~~ the existing Limerick-Galway railway line to Shannon International Airport taking account of and being informed by the proposals contained within LSMATS to facilitate a Commuter Rail Network for the Limerick - Shannon Metropolitan Area and by the N19 National Road upgrade, and b) To facilitate a proposed Shannon Rail Link which does not inhibit the N19 National Road Upgrade.

Submission No: S2/522 –Senan Nihill

Relevant Chapters / Topics

- **Clonlara**
- **Transport**

Summary of Issues Raised in Submission

This submission is a proposal for a footpath between Clonlara's new canal bridge to Monaskeha along R463. A map is included with this submission.

- No access to village other than driving.
- Primary school is 1km from Monaskeha but cannot use any forms of active travel.
- There are 62 houses around the area that would avail of this footpath.
- With the proposal for the Scariff-Limerick greenway this would be used to commute to work.

Chief Executive's Response

I wish to thank Senan Nihill for the submission and address the issues raised as follows:

The submission proposes a footpath along a section of the R463 regional road which links Limerick to Killaloe.

The proposed footpath, which is c. 1km in length, would be located outside the settlement boundary of Clonlara, as defined in the draft CDP.

Chapter 11 of the draft CDP includes the following objective CDP11.5:

Development Plan Objective: Walking and Cycling	
CDP11.5	It is an objective of Clare County Council: a) To require walkability and accessibility to be a central consideration in the planning and design of all new developments, transport infrastructure and public transport services; b) To facilitate and support the delivery of a safe, accessible and convenient cycle network and environment across the County and in the Limerick-Shannon Metropolitan Area as set out in the Cycle Network Plans; c) To support the development and enhancement of long-distance cycling routes in County Clare, in accordance with the *Strategy for the Future Development of National and Regional Greenways*;

		d) To safeguard, where feasible, the route of the old West Clare Railway which has not been affected by existing development and to encourage its use for recreational purposes and/or as part of a tourist attraction. Exceptions to this include short sections within the curtilage of residential or commercial property; e) To support the development of cycle-lanes in urban areas linking residential areas to town centres, employment centres and school locations; f) To support the development of new accessible walking routes and trails throughout the County; g) To support the enhancement of permeability, footpaths and the provision of safe crossing points in the towns and villages of the County; h) To support the creation of a safer environment for cyclists and signposted 'quiet routes' off the arterial roads which include speed limit reviews and junction redesigns where appropriate; i) To require significant walking and cycling route proposals to provide a Quality Audit, as referred to in the *Design Manual for Urban Roads and Streets*; and j) To ensure the development, enhancement, safeguarding of all walking and cycling routes are in compliance with the environmental requirements of Objective CDP3.1.

Therefore, having regard to CDP 11.5 (g) which supports the enhancement of footpaths in the towns and villages of the County, I consider that it is not appropriate for the Development Plan to provide policy support for the development of footpaths that are outside the settlement boundaries of towns and villages, such as the footpath subject of this submission.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/538 –SLR Consulting Ireland on behalf of Roadstone Ltd	
Relevant Chapters / Topics	• **Core Strategy** • **Rural Development and Natural Resources** • **Service Infrastructure**

Summary of Issues Raised in Submission

This submission relates to the extractive industries and quarrying of aggregates.

In the submission the property assets in County Clare are noted including Ballyquin, Bunratty, Meelick, Toonagh and Fountain Cross (former Whelan's quarry). These contain aggregate resources and have provided/provide aggregates and added value construction materials to support the local, regional and national economy.

Policy Context

Notes that the importance of the extractive industries to the wider economy and the need to protect the operations of working quarries and proven aggregate resources is firmly established in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). The NPF's NPO 23 is supportive of the extractive economy. The RSES supports implementation of the NPF and economic policies and objectives of the Government through a regional framework. Refers to the recently published 'Essential Aggregates – Providing for Ireland's Needs to 2040' (Irish Concrete Federation) which highlights to government the need for a national planning policy for aggregates, which will underpin local and regional planning policy and ensure the sustainable supply of aggregates for Project Ireland 2040 and beyond, including the:

1. Importance of Extractive Industries and Aggregates.
2. Identifying and Protecting Reserves.
3. Enabling Extraction of Aggregates.

Notes the inclusion of policies and objectives in Chapter 8 of the Draft Plan which support the extractive industry, the support for re-use of quarry sites in Chapters 10 and 11 for recreation and reference Quarrying, Minerals and Aggregates in Volume 10b Strategic Environmental Assessment.

Chapter 3 Core Strategy

Considers the extractive industry should be considered crucial to unlock the County's potential, providing the raw materials for the majority of building and infrastructure development including housing. Notes that the county has significant, but finite mineral resources. The Draft Plan should safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry, whilst ensuring that environmental, rural, scenic, and residential amenities are protected. Notes the need to safeguard valuable un-worked deposits from permanent development that would prevent or hinder their future extraction and thus appropriate control measures should be put in place to avoid such a scenario.

Chapter 8 Rural Development and Natural Resources

Welcomes the section 'Extractive Industries' which Chapter 8, however, notes no further emphasis within the chapter regarding the socio-economic benefits of the sector. Considers Draft

Plan could be revised to adequately outline the economic value and significance of the aggregates sector in terms of economic development and with regard to construction and development supply chains in meeting the population and housing delivery targets.

Welcomes Objective CDP11.38 'Construction and Demolition Waste' in Chapter 11, however considers the Draft Plan could offer further solidify the application of the after use of quarry and extractive sites by providing an additional policy objective regarding the re-use of quarries is included, as follows:

> *To encourage the rehabilitation of disused quarries and extractive sites, to include restoration / backfilling with inert soil and stone, and to possible uses including habitat restoration, sustainable forestry, agriculture, recreation/amenities, commercial, industrial, and residential, or a combination of same, subject to normal planning and environmental considerations.*

Appendix 1 - Development Management Standards

Notes that there appears to be no Development Management standards pertinent to the extractive sector in the Draft Plan and notes that all of Roadstone's property assets/extraction locations in County Clare are in line with typical planning and environmental standards that would apply.

Further Considerations

Notes that Planning systems in England and Wales include 'safeguarding of reserves' -'Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance'. Considers that Planning Authorities should adopt a systematic approach for safeguarding mineral resources. It is suggested that the Draft Plan highlights areas containing proven deposits on an appropriate map to protect them from future development of incompatible land use.

Chief Executive's Response

I wish to thank Roadstone Ltd for the submission to the Draft Plan.

Policy Context

The Council recognise the importance of the aggregates industry and the value to the economy, the Draft Plan seeks to reflect the national and regional policy in this regard.

Chapter 3 Core Strategy

I recognise the importance of the aggregates industry and its contribution to the achievement of the development objectives across the county. I also recognise the need to safeguard these deposits for future extraction and the Council's commitment to same which is explicitly stated in Section 8.3.6 Extractive Industry, Chapter 8, Volume 1, "The Council will facilitate the harnessing of the area's natural resources whilst ensuring that the receiving environments amenities are appropriately protected."

Chapter 8 Rural Development and Natural Resources

The role of the Development Plan is to set out policy and objective support and I am satisfied that the policies and objectives outlined in Chapter 8 the Draft Plan adequately support extractive

industries in the County. Section 8.3.6 notes the importance of the extractive industry in the County and the contribution the industry mans to the construction sector, employment generation and economic life.

I note the comments made in relation to the after use of quarry and extractive sites and I consider it is appropriate to include an objective in relation to same.

Appendix 1 - Development Management Standards

I note the comments in relation to Roadstone's property assets/extraction being in line with typical planning and environmental standards that would apply.

Further Considerations

I note the approach in the England and Wales, however, this approach is not recognised or supported in current planning legislation in Ireland. The Draft Plan recognises the important role that the extractive industry has in the economy of the county and in this regard, policies and objectives have been included in Section 8.3.6 Extractive Industry, Chapter 8, Volume 1 of the Draft Plan which support the industry while having regard to protecting residential amenity and the receiving environment. Given the limited level of detail that could be conveyed and difficulties in accurately reflecting the most up to date extents of any quarry, it is considered that there is little merit of including a map to show the location of quarries and minerals in the county is questionable.

Chief Executive's Recommendation

I recommend that the following point is included in Objective CDP8.14, under Section 8.3.6 Extractive Industry, Chapter 8 of Volume 1 as follows:

b)To support the satisfactory and sensitive re-instatement and / or re-use of disused quarries and extraction facilities, where active extraction use has ceased. Future uses should include amenity, recreation and biodiversity areas and shall be informed by an assessment of the specific site/lands in accordance with the restoration plan under the facility's EPA licence.

Submission No: S2/541 –Physical Development Directorate – Clare County Council

Relevant Chapters / Topics

- **Access and Movement**
- **Ennis Municipal District**
- **West Clare Municipal District**

Summary of Issues Raised in Submission

- Submission is from the Project Management Office of Clare County Council and concerns the development of a Greenway along the former route of the West Clare Railway where feasible;
- Suggests changes to the text of Policy Objective CDP 10.11 (b) in Chapter10 of Volume 1 'Written Statement' of the draft CDP;
- Labelling of Greenway in Volume 2 Maps to be adjusted to 'Indicative Route of the West Clare Railway Greenway';
- Suggests changes to the text under 1.11.3 Tourism Products in Volume 3A Ennis Municipal District and that labelling of Greenway in the Ennis Settlement Map to be adjusted to 'Indicative Route of the West Clare Railway Greenway';
- Labelling of Greenway in Settlement Maps in the Settlements it passes through to be adjusted to 'Indicative Route of the West Clare Railway Greenway';
- Suggests changes to the text in the Ennistymon / Lahinch Settlement Plan;

Chief Executive's Response

I wish to thank the Physical Development Directorate for the submission and I wish to address the issues raised as follows:

The submission highlights that the mapping of the proposed greenway should be described as 'Indicative' on the Volume 2 Maps for 'Infrastructure, Environment and Flood Risk Zones' and also in the Volume 3 Settlement Plan maps. I concur with this approach as it is consistent with the status of the project at present which is currently in its route selection and design phases.

The submission also highlights that additional and more refined policy support is necessary in relation to the greenway project, and I concur with the suggested amendments to Volume 1, Volume 3A and Volume 3D. These are reflected in my recommendations section below.

Chief Executive's Recommendation

Amend Volume 1 Chapter 10 CDP 10.11, as follows:

Development Plan Objective: Recreational Routes	
CDP10.11	It is an objective of Clare County Council: a) To support the maintenance of existing off-road walking and cycling trails and support investment in the sustainable development of walking and cycling facilities, greenway and

	blueway corridors within the County and region extending into and between our County's settlements; b) To support and facilitate the development of a network of interlinked greenways and necessary supporting infrastructure along the former route of the West Clare Railway ~~Greenway and necessary supporting infrastructure~~ subject to project level environmental assessments (Refer to Volume 2 for the indicative route of the West Clare Railway Greenway); c) To promote the development of regional-scale off-road cycling trails and associated facilities in the Cratloe Woods area; d) To ensure that any proposed development for off-road walking and cycling are based on rigorous site/route selection studies, take into consideration the safe and adequate provision of access, set-down and parking areas, and where appropriate that natural borders/buffers are included as an integral component of the design; e) To complete heritage audits and improve heritage interpretation along walking and cycling routes in the County; f) To encourage and support the development of ancillary businesses such as bike hire and repair, outdoor clothing sales, drying rooms for walkers, surfers and others as well as businesses offering walking and cycling tours subject to normal planning considerations; g) To ensure that the development of any off-road walking and cycling routes, blueways and peatways is informed by an appropriate level of environmental assessment, including all necessary reports to assess the potential impact on designated European sites and any impacts that may arise from increased visitor pressures; and h) To ensure that all cycle routes adhere to the principles contained within the national policy document *Smarter Travel: A Sustainable Transport Future*, and *the National Cycle Policy Framework* or any updated/amended guidance document and that integration between routes is achieved where appropriate.

Amend Volume 2 as follows:

Maps I1 – I12 'Infrastructure, Environment and Flood Risk Zones' Amend the legend to 'Indicative Route of the West Clare Railway Greenway';

Amend Volume 3 A Ennis Settlement Plan Map, as follows:

Amend the legend to 'Indicative Route of the West Clare Railway Greenway';

Amend Volume 3A Ennis Settlement Plan Section 1.11.13, as follows:

West Clare Railway Greenway

The West Clare Railway Greenway ~~is~~ will form an off-road, low-gradient path for walking and cycling along the former route of the famous 'West Clare Railway'. When complete, the greenway will form part of the National Cycle Network and will link Ennis, Shannon and Limerick to the 'Wild Atlantic Way' at Lahinch and continue southwards to Kilrush and Kilkee. Currently the indicative route commences in the Town Centre and the cycleway is envisaged to follow~~s~~ an existing riverside trail along Cloughleigh Road, Lahinch Road and Drumcliffe Road to the Active Ennis Lee's Road Sports and Amenity Park. The indicative diverse route will then follow a forest trail before following the line of the West Clare Railway through the stunning local landscape.

Amend Volume 3D West Clare Municipal District Settlement Plan Maps, as follows:

Amend the legend to 'Indicative Route of the West Clare Railway Greenway';

Amend Volume 3D West Clare Municipal District Ennistymon/Lahinch Settlement Plan text at

Transport, Active Travel and Connectivity

Bus Eireann and Local Link provide a regular bus service to and from Kilrush and Ennis. This service provides an alternative to the private car for local residents and visitors and encourages a modal shift to a more sustainable transport option.

Enhancement of and provision for green infrastructure such as walking and cycling routes would promote active recreation and sustainable travel in the town and its environs. In this regard, as part of the National Transport Authority's Active Travel 2021 programme funding has recently been allocated for improvements and public lighting to the footpath linking Ennistymon and Lahinch.

The development of the West Clare Railway Greenway along the line of the old West Clare Railway as a proposed recreational route is supported in this Plan. This will lead to enhanced pedestrian and cycle linkages between Ennistymon and Lahinch in terms of settlement, tourist facilities, expansion of the tourist base for both towns, and the creation of new green infrastructure linkages.

The benefits of improving linkages between Ennis, Ennistymon and Lahinch are extensive. It will enhance the existing linkages between the towns in terms of community infrastructure, strengthening the co-benefits between the settlements and also supporting the economic development including, tourist base & facilities, expansion of the tourism base for both towns and it will also support sustainable mobility between the towns. Proposals to redevelop the former railway line will be subject to the appropriate project level environmental assessments.

It is an objective of the plan:

• To prioritise the development of the West Clare Railway Greenway between Ennistymon/Lahinch and Ennis.

Submission No: S2/565 –Shannon Foynes Port Company	
Relevant Chapters / Topics	• **Renewable Energy Strategy** • **Shannon Estuary**

Summary of Issues Raised in Submission

This submission welcomes the recognition of the Shannon Estuary and the ambition to become self-sufficient in renewable energy. The National Planning Framework identifies the effectiveness of Ireland's ports and airports as being vital drivers of Ireland's competitiveness and future prospects and it is within the context of these national and statutory documents that this submission has been made.

<u>The Role of SFPC</u>

- To note that their Tier 1 and Ten-T Core Port designations includes all ports and jetties under their management including facilities in Clare.
- Requests that their role as a port of international and national significance is acknowledged including its Tier 1 and Ten-T Core Port status.

<u>Vision 2041</u>

- Welcomes objective CDP11.23 to support expansion of Shannon Foynes Port and support capital infrastructure projects in the company's Infrastructure Development Programme.
- Requests that objective CDP11.23 is broadened to specifically reference its 30 year masterplan as currently supported in Limerick Draft Plan.
- Whilst Section 12.3 acknowledges the requirements to ensure that shipping on the Shannon Estuary continues to make a contribution to national and regional economy Objective CDP12.7 makes no reference to the role, nor does it acknowledge the framework for delivery of these initiatives.

<u>Offshore Renewable Energy (ORE)</u>

- Objective CDP12.8 supports ORE by seeking to ensure that the Estuary fulfils its optimum role.
- However, Section 12.2.2.2 appears to focus on the potential of Moneypoint as a Green Energy Hub and has concerns with single focus place on one SDL particularly when SIFP identifies 6 potential sites on Estuary.
- Considering the advantage of Irelands Atlantic floating wind resource, all SIFP designated SDL sites on Estuary have potential to produce significant amounts of green hydrogen in support of Europe's plans.
- A multi-site approach on the Estuary must be adopted if we are to realise our national and European climate action objectives of 51% reduction by 2030 and net zero by 2050.

<u>Logistics Hub</u>

- Aims to develop sites on Estuary as a Logistics Hub to initiate direct unitized shipping services from Foynes to Europe.
- Foynes has potential to establish itself as a logistics hub similar to logistic parks based in Co Dublin.
- Requests that the Plan provides an objective supporting the development of a Port Centric Logistics Hub on Shannon Estuary.

Chief Executive's Response

I thank the Shannon Foynes Port Company for the submission.

Vision 2041 - The important role of Shannon Foynes Port is acknowledged and reflected in the policy support set out in the draft Plan in Chapter 11 Physical Infrastructure, Environment and Energy, particularly in section 11.2.14 Ports, Jetties, Harbours, Quays and Piers and in objective CDP11.23 Shannon Foynes Port.

Offshore Renewable Energy - Clare County Council fully supports the identification of all the Strategic Development Locations identified as part of the SIFP for the Shannon Estuary and the importance they plan in realising both the Offshore Renewable Energy potential in the Shannon Estuary together with the potential to facilitate Green Energy Hubs. While Moneypoint and Cahiracon are discussed within Volume 1 of the Plan given their location within Clare County Councils jurisdictions, all of the SDLs are fully supported and discussed in detail in Volume 9. Clare County Council is actively promoting the Shannon Estuary as a logistics hub utilising all of the ports and deep water within its confines to attract and realise the full potential of this sector which will lead to significant economic development on both sides of the estuary.

Logistics hub - Clare County Council acknowledge the work being undertaken by Shannon Foynes Port Company to update their Vision 2041 Masterplan which will address the full potential of the Strategic Development Locations in the development of a Port Centric Logistics Hub. The concept of a Logistics Hub in the Shannon Estuary is fully supported and the Council is actively involved in the marketing of these sites to industry, in particular the various Offshore Wind development companies currently undertaking site investigations off the Clare and Kerry Coastline.

In addition, Clare County Council through membership on the Shannon Estuary Taskforce are ensuring that the key elements of the Strategic Integrated Framework Plan are embedded in the final report which is due in October 2022. Until such time as the work of this group is concluded it is considered premature to include a specific objective within the CDP looking at the development of a Port Centric Logistics Hub. The objectives contained in Volume 1, together with the inclusion of the SIFP within Volume 9 fully support the development of the SDLs and indeed the ORE sector and as such I am satisfied that the objectives as included will not hinder the establishment of the Port Centric concept should it be deemed necessary.

Chief Executive's Recommendation

I recommend the following amendment to the Draft Clare County Development Plan 2023-2029:

- Volume 1 Written Statement, Chapter 11 Physical Infrastructure, Environment and energy, Section 11.2.14 Ports, Jetties, Harbours, Quays and Piers – insert additional section as follows:

"Shannon Foynes Port Company

Shannon Foynes Port Company, Ireland's second largest port operation, has statutory jurisdiction over all marine activities on a 500km2 area on the Shannon Estuary, stretching from Kerry/Loop Heads to Limerick City. The company provides a variety of services, from controlling navigation and marine safety, to warehousing, logistics and cargo handling. SFPC handle some of the largest vessels entering Irish waters, up to 200,000 dead weight tonnes (DWT). It is a port of national and international significance and has set out its 30-year masterplan Vision 2041 which aims to

double port throughput to 20m tonnes per annum over the plan period.

In order to facilitate this growth, capacity enhancements are required within and external to the port, including:

Ongoing expansion of jetty infrastructure (€47m);

• Reinstatement of Limerick to Foynes Rail line (€45m);

• Upgrade of Limerick to Foynes road network (€450m);

• New deep-water berth at Foynes Island (€175m)".

- Volume 1 Written Statement, Chapter 11 Physical Infrastructure, Environment and Energy, Objective CDP11.23 Shannon Foynes Port – insert additional sub objective as follows:

"It is an objective of Clare County Council:

a) To support the continued expansion of Shannon Foynes Port in compliance with the environmental requirements of Objective CDP3.1 as it applies to Co. Clare; and

b) To support the capital infrastructure projects in the Shannon-Foynes Port Company Infrastructure Development Programme; and

c) To support Shannon Foynes Port Company's Masterplan Vision 2041."

Submission No: S2 – 625 – National Transport Authority	
Relevant Chapters / Topics	• Urban & Rural Settlement • Retail • Sustainable Communities • Physical Infrastructure • Access • Parking Standards

Summary of Issues Raised in Submission

Limerick Shannon Area Metropolitan Strategy

The Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) is to be finalised in Q2 of 2022 according to the submission.

Seeks reference to LSMATS throughout the Plan wherever transport and planning in the LSMA are concerned.

Chapter 4: Urban and Rural Settlement Strategy

Ennis (Chapter 4)

There is an absence of clear reference to objectives which would direct the growth of Ennis towards consolidation. There is no reference to the promotion of public transport, walking and cycling. Recommends a commitment to these issues is given in Objective CDP4.1.

Limerick-Shannon Metropolitan Area (Chapter 4)

To cooperate with NTA, TII and Limerick City & County Council in delivery of LSMATS. Refer to LSMATS in Objectives CDP4.2 and CDP 4.3.

Shannon (Chapter 4)

Objective CDP4.4 makes no reference to the delivery of LSMATS as it relates to Shannon town – it is recommended that CDP4.4 is amended to include that reference.

University of Limerick – Clare Campus (Chapter 6 Economic Development)

The SDZ proposal needs a more prescriptive approach in the Development Plan, due to the scale of the development envisaged (as was recommended in the NTA's submission on the CDP Issues Paper). Recommends Objective CDP6.8 is amended regarding impact on the national and strategic road network, aligning with Bus Connects Limerick requirements, car-parking and cycle parking provision, Mobility Management Plans.

Also recommends that bullet point (f) is removed from CDP6.8 because there is no viability in a rail link to the UL North Campus.

Retail

NTA acknowledges that some edge of centre and out-of-town retail may occur in exceptional circumstances and therefore recommends that bullet point (c) of Objective7.17 is amended:

"… including the requirement to be served by public transport and to be accessible to their catchment by walking and cycling."

Sustainable Communities - Primary and Secondary Education

Welcomes Objective CDP10.16 in Draft and would recommend that the planning principles within the NTA's Safe Routes to School Design Guide (2021) are considered for inclusion:

- New school sites in urban areas should not be progressed until it can demonstrate that majority of students/staff can travel by walking, cycling or public transport.
- All Plans and Schemes should ensure that access by walking, cycling and public transport is key in location of new schools.
- Ensure design maximises the priority for pedestrians and cyclists.
- Planning applications should only be supported where it shows that the road network is planned to facilitate, safe walking and cycling.

Physical Infrastructure, Environment & Energy (Chapter 11)

Recommends that a chapter dedicated to Transport is included in final Plan.

Strategic Aims (Chapter 11)

Recommends that the reduction in CO2 emissions from transport in line with the Climate Action Plan is referenced under Section 11.1.

Access & Movement(Chapter 11)

Recommends many changes to Section 11.2 and that same needs a fundamental review.

Volume 1 Appendix 1 Development Management Guidelines – Parking Standards

A number of recommendations are made relating to parking standards:

- All car-parking standards should be defined as maxima.
- 2 car-parking spaces per residential unit may be considered excessive for town centre developments, in order to generate positive mode share changes.
- The car-parking standards for Office uses should be reviewed and amended, in order to generate positive mode share changes.
- The car-parking and cycle-parking standards for 3rd level education should be reviewed and amended, in order to generate positive mode share changes.
- The cycle-parking standards for office, retail and schools should be reviewed and amended, in order to generate positive mode share changes.
- Drop-off by motorists at schools is not in line with best practice and Note 11 in the Appendix should be amended in line with the provisions for vehicle set-down for parents contained in the NTA's Safe Routes to School Design Guide (2021).

Chief Executive's Response

I wish to thank the National Transport Authority for the submission and address the issues raised as follows:

LSMATS

I intend to recommend that Policy Objective CDP4.2 and CDP 4.4 is amended to include appropriate reference to LSMATS.

University of Limerick – Clare Campus (Chapter 6 Economic Development)

The submission seeks a more prescriptive approach is set out in the Development Plan. It suggests

amendments to Objective CDP6.8 which would incorporate transport measures into the overall objectives for delivering development at the UL Clare Campus.

The Council's intended approach to developing the UL Clare Campus is that is designated as a Strategic Development Zone, and that a Planning Scheme would be prepared for approval on foot of that designation. That Planning Scheme will be developed and agreed between the landowners, Clare County Council, Limerick City and County Council, Transport Infrastructure Ireland (TII) and the NTA, among other stakeholders. Within the Scheme, the detailed consideration will be given to road infrastructure, public transport, car and cycle parking; cycle infrastructure, permeability and mobility management. I propose to amend sub-objective (d) of CDP 6.8 in order to give increased prominence to the required transport framework as a component of the integrated development of the lands.

I note the point made in relation to a potential rail connection to UL and agree that since that measure has not been proposed within the Revised Draft LSMATS, it is not appropriate to include an objective for it.

Retail

I intend to recommend that Policy Objective CDP7.17 is amended to include appropriate reference to public transport, walking and cycling in the context of edge-of-centre retail proposals.

School Location

I intend to recommend that Policy Objective CDP10.16 is amended to include appropriate reference to sustainable transport in the context of school location.

Reduction of CO2 emissions from transport

I intend to recommend that the reduction of CO2 emissions from transport is included as a Strategic Aim of Chapter 11, at Section 11.1 of that Chapter.

Request for Chapter dedicated to Transport

In relation to the request that a chapter dedicated to Transport is included in the final Plan, it is agreed that transport is a critical matter for the development of County Clare. However, it is respectfully suggested that Chapter 11 of the draft CDP provides a comprehensive set of policies and objectives regarding sustainable transport, in the context of the Council's role as a provider of Physical Infrastructure. Within the remainder of the plan, sustainable transport is presented as a critical component of retail planning, economic development and the planning of sustainable communities. At the settlement level, sustainable transport is a central consideration in planning for the future development of settlements at all levels of the settlement hierarchy, and the integration of land use and transportation is a core consideration of the settlement plans. I do not seek to change the draft CDP in relation to this point.

Volume 1 Appendix 1 Development Management Guidelines – Parking Standards

A number of requests are made relating to parking standards. The Council is committed to support the shift away from car dependency and to support the modal shift to alternative modes of transport. In reviewing the content of Section A1.6.3 Bicycle and Vehicle Parking Standards', it is noted that updated references to the relevant government guidelines are required. This will be incorporated into my recommendation section below.

I note in 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' (December 2020) at Section 4.21 that at 'Intermediate Urban Locations' (those "suburban/urban locations served by public transport or close to town centres or employment areas") planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard. Therefore I consider that it is appropriate that residential car-parking standards should be reduced in town centres (from 2 spaces to 1 space for 3+ bed units) and shall be defined as maxima in all contexts. This will require an amendment to Table 3A and to Note 5 attached to Table A3 – 'Bicycle and Vehicle Parking Standards'.

Additionally, I consider that the subsequent Note 12, which provides that "Applicants may propose an alternative parking arrangement to the standards as set out in the parking standards set out in Table A3 for the agreement of the Planning Authority", allows applicants adequate flexibility to supply parking spaces in excess of the maximum standard in certain circumstances, within a planning application.

I have reviewed the car-parking standards for Office uses and consider that they represent an excessive provision of parking in both town centres and in other areas and to and would therefore diminish the potential to achieve positive mode share changes. Consequently, I propose to reduce the quantum in town centres from 2 spaces per 100 sqm to 1 space per 100 sqm and in other areas from 3 spaces per 100 sqm to 2 spaces per 100 sqm.

The submission highlights that the car-parking and cycle-parking standards for 3rd level education in the draft CDP may not generate adequate positive mode share changes. In view of the opportunities that third-level institutes present in terms of influencing the mode choices of its students (particularly) and its staff through mobility management initiatives at the campus, I propose to allow the car-parking provision at such developments be decided on a case-by-case basis at the development management stage. I also propose to increase the cycle parking provision for staff and students of third-level institutes.

Certain uses listed for town centres may appear to be incompatible with town centres, however, given that such uses can pre-exist this development plan (and may seek to enlarge their floor area) it is not recommended that such uses be omitted from the parking standards for town centre areas. Likewise, to attach a zero destination parking standard to commercial development in town centres would be restrictive on the expansion of an existing commercial activity.

I have reviewed the cycle parking provision for employees at office and retail development, and for those travelling to school sites and have revised same to provide for cycle parking that would facilitate 20% of those working / attending to travel by bike. Note that the cycle parking standards do not differentiate between town centre and other areas – this distinction is for car-parking only.

I agree that Note 11 attached to Table A3 – 'Bicycle and Vehicle Parking Standards' should be amended in line with the provisions for vehicle set-down for parents contained in the NTA's Safe Routes to School Design Guide (2021). The suggested wording is set out in my recommendation below.

Chief Executive's Recommendation

I recommend that the following changes are made to the draft CDP:

Volume 1, Chapter 4, CDP4.2 shall be amended as follows:

Development Plan Objective: Limerick-Shannon Metropolitan Area	
CDP 4.2	It is an objective of Clare County Council: a) To strengthen the role of the Limerick Shannon Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of sustainable economic and population growth in the Southern Region; b) To promote and to seek investment to sustainably develop the Limerick Shannon Metropolitan Area as a cohesive metropolitan area with: i) Compact and sustainable growth and regeneration of Shannon; ii) Active land management initiatives to deliver housing and employment locations in a sustainable, infrastructure-led manner. c) To seek co-ordinated investment and delivery of holistic infrastructure packages across State Departments and infrastructure delivery agencies as they apply to the Limerick Shannon Metropolitan Area and seek further investments to deliver on the Metropolitan Area Goals set out in the Regional Spatial and Economic Strategy for the Southern Region and the National Development Plan; d) To protect, manage and improve the coherence of the Natura 2000 Network through enhanced ecological connectivity; e) To support the sustainable delivery of the Strategic Investment Priorities identified by the National Development Plan for the Limerick-Shannon Metropolitan Area and progress co-ordination between the principal stakeholders for delivery to achieve the vision and objectives identified for the MASP; (f) To cooperate with the NTA, TII and Limerick City and County Council in the delivery of the LSMATS; ~~f~~g) To promote the sustainable implementation of innovative, collaborative projects through the Urban Regeneration and Development, Rural Regeneration and Development, Climate Action and Disruptive Technologies funds for the Limerick-Shannon Metropolitan Area;

	~~g~~h) To ensure the investment in and the delivery of the Sustainable Place Framework delivering quality of place attributes as an incentive to attract people to live, work and visit; ~~h~~i) To carry out a site selection process which considers all environmental issues and which identifies suitable sites for regeneration and development; ~~i~~j) To sustainably manage future development within the Limerick-Shannon Metropolitan Area, taking account of its environmental, ecological, heritage and landscape values with a particular focus on building a climate resilient growth area.

Development Plan Objective: **Shannon**	
CDP 4.4	It is an objective of Clare County Council: a) To ensure that Shannon, in its critical role as a metropolitan town within the Limerick Shannon Metropolitan Area is a driver of prosperity for the Metropolitan Area, County and Region by harnessing its strategic location on the Atlantic Economic Corridor, its high quality connectivity and it's employment base, international airport, and other competitive advantages; b) To seek investment to regenerate and rejuvenate Shannon, through the preparation and implementation of a new Local Area Plan, the enhancement of transport services, amenity and design quality, and the delivery of smart technologies in order to drive public sector led recovery, and to sustainably influence and support the Metropolitan Area and the wider County/Region; c) To seek investment and to support the delivery of holistic infrastructure that will facilitate and accommodate sustainable growth in Shannon, subject to the outcome of the planning process and environmental assessments; d) To have regard to the Shannon Town Centre Masterplan, which provides the basis for a new Urban Regeneration and Development Fund application, in the preparation of the local area plan; e) To support and promote placemaking in Shannon which would include public realm regeneration and urban renewal initiatives and public private partnership approaches to town centre regeneration; (f) To cooperate with the NTA, TII and Limerick City and County Council in the delivery of the LSMATS;

	~~f~~g) To support the development of housing and ancillary facilities in Shannon in order to facilitate the growth of Shannon's population by 30% by 2040; and ~~g~~h) To monitor the cumulative effect of grants of planning permission on available wastewater capacity where connection to a public wastewater treatment plant is included as part of a development proposal

Volume 1: Chapter 6 Economic Development: Amend Objective CDP 6.8 (SDZ).

Development Plan Objective: **University of Limerick - Clare Campus** **Proposed Strategic Development Zone**	
CDP6.8	It is an objective of Clare County Council: a) To secure the designation and subsequent development of the South Clare/University of Limerick Economic Strategic Development Zone (SDZ) on lands including those identified as the University Zone, in accordance with the objectives and provisions of this development plan subject to the provisions of the Planning and Development Act 2000 (as amended) and all environmental considerations; b) To support, promote and encourage the further expansion of the University of Limerick campus on the north side of the River Shannon, including hinterland development within the University Zone; c) To work closely with the University of Limerick in realising the vision for the Clare Campus as a world class learning, research and development hub through its development as a world-class centre for the localisation of globalised development; ~~d) To improve sustainable mobility to the SDZ and UL campus from County Clare and Limerick City centre;~~ d) To ensure that the SDZ Planning Scheme optimises movement by sustainable transport modes through: • appropriate development layouts which allow for permeability (including filtered permeability for walking and cycling); • Provision of a comprehensive cycle network which is linked to the wider cycle networks in Limerick and Clare and is designed in accordance with the National Cycle Manual; • Provision and design of car-parking and cycle-parking in a manner that gives a distinct advantage to cycling and walking over car transport for trips within, to and from the SDZ site;

	• A commitment to comprehensive mobility management measures for all employment and education developments within the site; • New road infrastructure shall be designed in accordance with the requirements to meet Bus Connects; • The planning scheme shall incorporate a full public transport strategy for the development site which shall be formulated with input from key stakeholders including the NTA. e) The impact of the South Clare/University of Limerick Economic Strategic Development Zone (SDZ) on the national and strategic road network shall be fully assessed, and any mitigation measures shall be arrived at following engagement and input from key stakeholders including the TII and the NTA; ~~e~~ f) To support and promote the future reopening of the Errina Canal as a piece of functioning waterway infrastructure facilitating water-borne access to the Clare Campus, and to support any development proposals the University may have to maximise its strategic position adjacent to the River Shannon, River Blackwater and Errina Canal, including the reinstatement of the riverside walkway; ~~f) To support the future attainment of a strategic rail link including but not limited to the prospect of unmanned light electric rail from the Clare Campus of UL to the Ennis – Limerick rail line; and~~ g) To implement innovative decarbonisation and green infrastructure measures in the SDZ in accordance with the European Green Deal and national policy and legislation.

Volume 1: Chapter 7 Retail to be amended as follows:

Development Plan Objective: Edge-of-Centre Retail Development	
CDP7.17	It is an objective of Clare County Council a) To assess applications for edge-of-centre and out-of-centre retail developments having regard to the criteria and considerations set out in *Retail Planning – Guidelines for Planning Authorities* (2012) and the *Clare Retail Strategy*; b) To apply the sequential test to development proposals for edge of centre retail developments; and c) To permit edge of centre retail developments only where such development will strongly integrate into the existing town centre and will not have a negative impact on the vitality and viability of the relevant town centre, and subject to normal planning requirements, including the requirement

	to be served by public transport and to be accessible to their catchment by walking and cycling.

Volume 1: Chapter 10 Sustainable Communities to be amended as follows:

Development Plan Objective: **Primary and Secondary Education**	
CDP10.16	It is an objective of Clare County Council: a) To facilitate the provision of schools by zoning suitable lands in settlement plans and local area plans capable of meeting the demands of the projected populations and in line with the 2008 Code of Practice, *The Provision of Schools and the Planning System*; (b) To ensure that all Local Area Plans and SDZ Planning Schemes should ensure that access by walking, cycling and public transport is a key determinant in the location of new schools. ~~b~~c) To ensure that land developed for educational purposes is located as close as possible to the area experiencing population growth that it is intended to serve, are along public transport corridors where available and in close proximity to complementary services/facilities to allow for shared use; d) That new school sites in the Key Town of Ennis or within the Limerick Shannon Metropolitan Area should maximise opportunities whereby students and staff can travel by walking, cycling or public transport; e) To ensure that the design of new schools and the expansion of existing schools maximises the priority for pedestrians and cyclists above that of vehicular traffic and addresses conflict between motorists and pedestrians and cyclists; ~~c~~f) To assess and ensure the adequacy of school capacity when dealing with planning applications for large residential developments; and ~~d~~g) To ensure that planning applications for new schools or the expansion of existing schools should only be permitted where it is demonstrated that the road network in the vicinity of the proposed development can facilitate, or is planned to facilitate, safe walking and cycling, ~~to require the provision of cycle lanes, pedestrian footpaths and crossings~~ and where the promotion of behavioural change measures regarding active and safe travel to the school site are

	demonstrated as capable of being implemented through mobility management planning ~~to promote the idea of a 'walking school bus' serving primary and secondary school facilities.~~ ~~to support safe and convenient active travel modes.~~

Volume 1: Chapter 11 Physical Infrastructure, Environment & Energy to be amended as follows:

11.1 Strategic Aims

This Chapter presents the objectives for the provision of physical infrastructure for the existing and future population of County Clare, in accordance with the overall vision of the Plan. These objectives are based on the following strategic aims:

- To provide a safe, integrated, efficient and sustainable network of transport to serve the needs of people, goods and services travelling to and within County Clare;
- To promote and encourage the use of alternative sustainable modes of transport;
- To safeguard the strategic transport function of the motorway and national road network and associated junctions in order to cater for the safe and efficient movement of inter-urban and inter-regional traffic;
- To facilitate a reduction in CO2 emissions from transport in line with the National Climate Action Plan;
- To protect, improve and conserve the County's water resources to meet the requirements of the *River Basin Management Plan for Ireland 2018-2021* and any subsequent revisions or updates to this Plan;
- To encourage and promote the benefits of the re-use and recycling of waste and to enable the provision of appropriate waste management facilities throughout the County in accordance with the *National Waste Management Plan for a Circular Economy;*
- To reduce County Clare's dependence on imported fuels and to provide alternative energy sources by harnessing the County's potential for renewable energy sources;
- To ensure security of energy supply throughout the County; and
- To promote and facilitate the provision and continued development of broadband and ICT infrastructure to further enhance social and economic development, particularly in the more peripheral areas of County Clare.

11.2 Access and Movement

11.2.1 ~~Integrated Land-Use and Transportation Planning~~ Regional Spatial and Economic Strategy

11.2.2 ~~Smarter Travel and Sustainable Mobility~~ Integrated Land Use and Transport Planning

~~*Smarter Travel (2009-2020)* is the transport policy for Ireland that sets out how the vision of a sustainable travel and transport system can be achieved. The following five key goals form the basis of the Policy:~~

- ~~Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to a lack of transport;~~
- ~~Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks;~~
- ~~Reduce overall travel demand and commuting distances travelled by the private car;~~
- ~~Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions; and~~
- ~~Improve security of energy supply by reducing dependency on imported fossil fuels.~~

~~A review of the Smarter Travel policy document is currently under way for County Clare. This will support a move toward more sustainable travel and transport options, promoting the development of walking, cycling, public transport and other sustainable forms of transport such as car-sharing and car-pooling, as an alternative to the private car. The Development Plan includes objectives to support walking and cycling, green infrastructure development, active living and sustainable residential development which will contribute to the achievement of the goals of the Smarter Travel programme.~~

~~An example of a smarter travel initiative in County Clare is the 'Clare Local Lift' community car sharing model which aims to address rural transport challenges in the County. With funding secured from Enterprise Ireland under the Small Business Innovation Research (SBIR) Fund, Clare County Council in conjunction with an intelligent mobility solutions partner is leading this project to develop a pilot community transport service based on a car sharing model.~~

In order to promote public transport, walking and cycling across the County, it is the intention of the Council to:

- Consolidate development into town and village centres in accordance with the 10-minute town concept;
- Consolidate development around existing and proposed public transport services and facilities;
- Increase densities in future residential and employment developments;
- Prioritise mixed-use development which reduces the need to travel;
- Ensure that all new development areas will be fully permeable for pedestrians and cyclists through the application of the principle of filtered permeability whereby through traffic by private car is discouraged;
- Deliver schemes to improve permeability for walking and cycling in existing developed areas; and
- Ensure that the layout of new developments will prioritise walking and cycling and enable the efficient provision of public transport services.

In its promotion of integrated land use and transportation planning, the Council will seek to implement the following national policy documents:

- The National Investment Framework for Transport Investment (Department of Transport);
- The Five Cities Demand Management Study (insofar as it relates to that part of Clare within the LSMA);
- The existing sectoral policy documents which were published in 2009 - Smarter Travel - A Sustainable Transport Future 2009-2020 and the National Cycle Policy

Framework. These documents have been the overarching policy guiding smarter and sustainable transport development in Ireland. They are aimed at reducing private car use and ensuring alternatives to the private car were available, as well as initiatives to create a culture of cycling and walking in Ireland. These national policy documents which promoted sustainable travel modes are in the process of being succeeded by a new Sustainable Mobility Policy Framework.

Development Plan Objective: ~~Smarter Travel~~ Transport Planning	
CDP11.2	It is an objective of Clare County Council: a) that the overarching goal of transport planning in County Clare is to reduce car dependency and reduce emissions; b) to promote Steady State Investment to maintain and upgrade the existing road, rail and bus networks to provide a quality service to transport users; c) to implement initiatives under the Department of Transport to manage the impact of congestion in urban areas primarily by enhancing sustainable travel options through ~~Smarter Travel projects that include~~ traffic management, bus priority, urban cycling and urban walking routes; d) to support the reduction in the use of fossil fuels for public transport and increasing use of technology and green energy sources to pursue low emission public transport fleets, which is being pursued by the NTA as part of its fleet investment programme; e) ~~The delivery of the strategic bus network programme for Ennis and the Limerick- Shannon Metropolitan Area including associated customer services and facilities~~ to facilitate the expansion of the bus network by the NTA under initiatives such as Limerick BusConnects, Connecting Ireland, TFI Local Link Limerick Clare; f) ~~Park and ride multi modal travel~~ to support the implementation of Park and Ride initiatives in accordance with LSMATS; g) ~~The delivery of a comprehensive cycling and walking network with an emphasis on Ennis and the Limerick Shannon Metropolitan Area~~ to oversee investment in cycling and walking networks within all settlements, with an emphasis on providing for trips to school and retail services; h) The development of sustainable water transportation services for the Shannon Estuary in accordance with SIFP

	Objectives SIFP TPT 1.5, 1.7 and 1.8 contained in Volume 7 of the Plan; and i) Developments being in compliance with the environmental requirements of Objectives CDP11.17 and CDP3.1.

Development Plan Objective: Draft Limerick-Shannon Metropolitan Area Transport Strategy and Local Transport Planning	
CDP11.3	It is an objective of Clare County Council: a) To implement the measures contained within the Draft Limerick Shannon Metropolitan Area Transport Strategy in accordance with the Implementation Plan set out in the draft LSMATS document; b) To implement a Local Transport Plan for Ennis, Shannon, Sixmilebridge, Kilkee, Kilrush, Lahinch, Corofin and Tulla during the lifetime of this Development Plan; cand c) To work in close co-operation with Technical University of the Shannon: Midlands Midwest and the Endurance European network.

Development Plan Objective: **Walking and Cycling**	
CDP11.5	It is an objective of Clare County Council: a) To require walkability and accessibility to be a central consideration in the planning and design of all new developments, transport infrastructure and public transport services; b) To facilitate and support the delivery of a safe, accessible and convenient cycle network and environment across the County and in the Limerick-Shannon Metropolitan Area as set out in the Cycle Network Plans for Shannon and Limerick contained in the draft LSMATS; c) To support the development and enhancement of long-distance cycling routes in County Clare, in accordance with

	the *Strategy for the Future Development of National and Regional Greenways*; d) To safeguard, where feasible, the route of the old West Clare Railway which has not been affected by existing development and to encourage its use for recreational purposes and/or as part of a tourist attraction. Exceptions to this include short sections within the curtilage of residential or commercial property; e) To provide for cycling trips for people of all ages and abilities from residential areas to town centres, employment centres and school locations, in line with the National Cycle Manual; f) To support the development of new accessible walking routes and trails throughout the County; ~~g~~h) To support the enhancement of permeability, footpaths and the provision of safe crossing points in the towns and villages of the County; ~~h~~i) To support the creation of a safer environment for cyclists and signposted 'quiet routes' off the arterial roads which include speed limit reviews and junction redesigns where appropriate; ~~ij~~) To require significant walking and cycling route proposals to provide a Quality Audit, as referred to in the *Design Manual for Urban Roads and Streets*; and ~~j~~k) To ensure the development, enhancement, safeguarding of all walking and cycling routes are in compliance with the environmental requirements of Objective CDP3.1.

Development Plan Objective: Rail Network	
CDP11.6	It is an objective of Clare County Council: a) To support and facilitate the maintenance, improvement and strengthening of rail infrastructure and services and the provision of multi-modal transport interconnection facilities subject to appropriate environmental assessment and the outcome of the planning process; b) To support and facilitate the opening/reinstatement of railway stations on the Western Railway Corridor within County Clare and in particular at Crusheen, in line with feasibility studies undertaken on the basis of forecast

	demand and according to the investment priorities of Irish Rail and the National Transport Authority; c) To protect lands adjacent to rail stations against encroachment by inappropriate uses that could compromise the long-term development of the rail infrastructure; d) To identify and safeguard land required for the development of rail infrastructure including bridges, stations, goods terminals, weather proofed facilities and areas necessary for the development of the rail infrastructure in the County; e) To work with Iarnród Éireann and other interested parties to find a resolution of the issue of periodic flooding of the Ennis to Limerick railway line in order to sustain year-round rail services from Ennis to Limerick City. f) To ensure that all proposed developments are in accordance with the requirements of Objective CDP3.1.

Development Plan Objective: **Bus Transport**	
CDP11.8	It is an objective of Clare County Council: a) To support the provision of more regular, efficient and fully accessible bus services throughout the County, including through initiatives arising from the NTA's Connecting Ireland rural mobility plan; b) To support the implementation of public bus network enhancements in the South Clare area through BusConnects Limerick; c) To encourage and support Local Link private/public/community partnerships in the provision of a more widespread rural bus services; d) To support the creation of bus ~~corridors~~ priority measures, integrated bus interchange stations and bus parking facilities both within settlements and at tourist facilities throughout the County subject to appropriate environmental assessment and the outcome of the planning process; e) To promote the introduction of new bus services on routes where they can offer a direct alternative to the routes most popular with private car users;

	f) To work with all relevant stakeholders to provide new bus pick-up/drop-off locations and bus shelters in towns and villages across the County; g) To work with stakeholders to encourage and promote a sustainable community-based public transport scheme that will enable access to service centres for all members of the community in the County; h) To support the provision of a local bus service in Ennis and Clarecastle; and h) To support direct inter-regional bus services to and from Shannon International Airport, Limerick and Galway.

Section 11.2.7 Transport Assets and Multi-Modal Travel Integration

In order to reduce carbon emissions from the transport sector, to increase the usage of public transport and to increase its viability as an alternative to the private car for a greater number of users, it is vital that there is greater integration of public transport services. This integration should include both national transport providers and community-based services. Ennis as Clare's County Town is an important origin and destination for trips around the County and to and from the Limerick-Shannon Metropolitan Area and the Galway Metropolitan Area. ~~In line with the forthcoming LSMATS the Council will support and facilitate the development of Ennis as a bus and rail connecting hub for the County and surrounding areas.~~ . It is intended that Ennis will function as a bus and rail connecting hub for the County and surrounding areas. The planning and design of transport infrastructure and services within the LSMA will take account of the demand for travel to and from Ennis and the objectives for the town as set out in *Ennis 2040*.

Section 11.2.9.4 Strategic Regional Roads

Regional roads provide an important function in linking smaller towns and villages with the larger urban centres and with national primary and secondary routes. Where investment in a new regional road is proposed, in particular bypasses and relief roads, roadspace within the settlement served by the road shall be reallocated appropriately to sustainable modes, as a prerequisite to investment.

Developments requiring access onto key regional routes must be restricted in order to protect the capacity and safety of such routes.

Development Plan Objective: **Proposed Projects identified for Future Development**	
CDP11.15	It is an objective of Clare County Council: a) To integrate climate considerations and risk assessments into the design, planning and construction of all roads, footpaths, bridges, public realm and other construction projects and, where appropriate, to incorporate green infrastructure as a mechanism for carbon offset; b) To provide and/or facilitate the projects identified in Table

		11.2 where necessary, and to ensure that such road infrastructure is designed and constructed to fulfil its intended purpose and to promote and support active travel; c) To ensure that the relevant mitigation measures contained in Volume 10 of this plan associated with the projects identified in Table 11.2 are strictly adhered to; d) Where investment in a new regional road is proposed, in particular bypasses and relief roads, roadspace within the settlement served by the road shall be reallocated appropriately to sustainable modes, as a prerequisite to investment; e) To progress the delivery of the LNDR f) No new residential access points shall be permitted on the route of the proposed Limerick Northern Distributor Road and the Killaloe Bypass when constructed. g) To ensure that the design of the proposed Limerick Northern Distributor Road, as it intersects the R464 in Parteen, is included within an overall Masterplan for the village and provides for safe and adequate means of pedestrian and vehicular access and connectivity east and westwards within Parteen and across the route at this point; h) To ensure that results from a detailed hydrological, hydrogeological and engineering assessment inform the design of the Limerick Northern Distributor Road and University Link Road to avoid any adverse effect on the existing hydrological and hydrogeological regime within the Knockalisheen Marsh area. The design of the River Shannon Bridge shall be informed by the overriding requirement to avoid adverse impacts on the qualifying interests of alluvial woodland otter and lamprey species when assessed under the Habitats Directive; i) To ensure that the bridge abutments are set back a sufficient distance to allow for the retention of any existing riparian habitats or areas with the potential to develop into alluvial woodland. This will ensure maintenance of ecological connectivity on both banks for the River Shannon. The bridge deck shall be constructed at a sufficient height to allow for the continued development of any alluvial woodland present on both banks of the River Shannon such there will be no net loss of habitat; j) To ensure that the Tailrace Canal, Errina Canal and River Blackwater are all crossed on clear span structures, with the	

	abutments sufficiently set back from the watercourse banks to ensure maintenance of ecological connectivity. k) To ensure that the necessary ecological assessment of the design of these bridges will be informed and supported by a detailed review and assessment of similar developments in comparably sensitive environments; l) To ensure that all watercourse crossings, both culverts and bridges are designed so as to not impede the flood conveyance through the structure and not cause any significant change in flood levels, flow depths and velocities that would result in any noticeable increase in flood risk or erosion/accretion locally in the vicinity of the crossing or more remotely both in the upstream or downstream reaches; m) To ensure that the proposed road is set at a minimum level that provides sufficient freeboard above the 100 year with climate change flood event (200 year combined tide event in respect of the Knockalisheen area) so as to have a low flood risk over its design life and sufficiently elevated for its storm drainage system to function appropriately during flood events; n) To ensure that the construction of the bridges is monitored by a suitably qualified ecologist, and that appropriate mitigation will be employed to avoid risks of pollution during both the construction and operational phases; o) To ensure that all mitigation measures set out in the NIR and SEA contained in Volumes 10(a) and 10(b) of this Plan are complied with; and p) To ensure Inland Fisheries Ireland are consulted at early design stage and that compliance with Inland Fisheries Ireland *Guidelines on the Protection of Fisheries During Construction Works in and Adjacent to Water* (2016) or any subsequent updated versions is ensured.

Development Plan Objective: **Shannon International Airport**	
CDP11.19	It is an objective of Clare County Council: a) To support the development of an Airport Strategy for the Southern Region to be prepared by the relevant stakeholders through consultation with the Department of Transport,

		Local Authorities, Airport Authorities, TII, the NTA and other relevant stakeholders in the Southern Region; b) To facilitate and support the development and enhancement of the strategic role of Shannon International Airport, to advocate for a regional distribution of air traffic and strategic route development, and for a greater regional focus by national agencies; c) To support actions which will progress the transition of Shannon International Airport to a low carbon future; d) To facilitate and support the further development of the International Aviation Services Centre (IASC) cluster at Shannon as recognised in National Aviation Policy and to work to ensure that cross agency cooperation will continue to develop the IASC to meet industry demand; e) To support and facilitate multi-modal inter-regional and intra-regional transport linkages to and from the airport by both public and private service providers, with bus transport as the primary sustainable mode of transport; f) To safeguard current and future operational, safety, technical and development requirements of Shannon International Airport; g) To support and facilitate the upgrade of the Shannon Flood Relief Embankments to protect Shannon Town, Shannon Free Zone and Industrial Estate, and Shannon International Airport; h) To have regard to, and implement, the national land use policies and guidance in relation to the Red Zones and Public Safety Zones for Shannon International Airport, the *Irish Aviation Authority (Obstacles to aircraft in flight) Order, 2005* (S.I. No. 215/2005) and *EASA Regulation (EU) No 139/2014;* i) To have regard to the advice of the Irish Aviation Authority with regard to the effects of any development proposals in the vicinity of Shannon International Airport on the safety of aircraft or the safe and efficient navigation thereof; j) To have regard to the *Irish Aviation Authority Policy Land Use Planning and Offshore Development* (2015) in the assessment of relevant development proposals; and k) To ensure that all proposals are in compliance with Objective CDP3.1 of this plan.

Volume 1 Appendix 1 Development Management Guidelines – Parking Standards

A number of recommendations are made relating to parking standards and Section A1.6.3 and Table A3 shall be amended as follows:

A1.6.3 Bicycle and Vehicle Parking Standards

Parking standards outline the number of parking spaces required for new developments. The principal objective of defining parking standards is to ensure that in assessing development proposals appropriate consideration is given to the accommodation of vehicles attracted to the site within the context of the promotion of ~~Smarter Travel, the Government policy aimed at promoting~~ modal shift to more sustainable forms of transport. The Council's car parking standards have also been informed by the NPF which requires a strong focus on consolidating growth within existing built up areas, strengthening our urban centres and improving public transport, permeability and accessibility. The standards have also been informed by the 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' (~~2018~~ December 2020) including SPPR 8 ~~and SPPR 9~~.

Table A3 – Bicycle and Vehicle Parking Standards

Land Use	**Bicycle Parking**	**Car Parking**	
		Town Centres	**Other Areas**
Residential Developments – dwelling houses and apartments Visitor Parking	With garage: none Without garage: 1 space per unit	1 space for 1 & 2 bed units ~~2~~ 1 space~~s~~ for ≥3 bed units 1 space per 3 residential units	1 space for 1 & 2 bed units 2 spaces for ≥3 bed units 1 space per 3 residential units
Hotel / Guesthouse / B&B / Hostel	1 space per 10 bedrooms in hotel/ guesthouse/ B&B 1 space per 5 bed spaces in hostels	1 space per room + 1 space per 3 staff on duty + public space such as bars & restaurants as per the standards in this table	1 space per room + 1 space per 3 staff on duty + public space such as bars & restaurants as per the standards in this table
Caravan / Camping Site	1 space per pitch	1 space per pitch + 1 space per 3 staff on duty	1 space per pitch + 1 space per 3 staff on duty

Industrial or Manufacturing Uses	1 space per 100m^2	2 spaces per 100m^2	2 spaces per 100m^2
Data Centre	1 space per 500m^2	-	1 space per 500m^2
Warehousing	1 space per 1000m^2	1 space per 100m^2	2 spaces per 100 m^2
Offices	1 space per ~~8~~ 5 employees 1 space per 100m^2	1 ~~2~~ space~~s~~ per 100m^2 + 10% of staff parking for visitors	~~3~~ 2 spaces per 100m^2 + 10% of staff parking for visitors
Bank / Financial / Insurance	1 space per 8 employees 1 space per consulting room	2 spaces per 100m^2 +10% of staff parking for visitors	3 spaces per 100m^2 +10% of staff parking for visitors
Local Shop	1 space per ~~8~~ 5 employees 24 spaces per 100m^2	2 spaces per 100m^2	3 spaces per 100m^2
Convenience Retail	1 space per ~~8~~ 5 employees 20 spaces per 1000m^2	5-7 spaces per 100m^2 (dependent on site characteristics)	8 spaces per 100m^2
Shopping Centre or Large Retail Store (>1000m^2 gross floorspace)	1 space per ~~8~~ 5 employees 24 spaces per 1000m^2	5-7 spaces per 100m^2 (dependent on site characteristics) + 1 lorry space per 750m^2	8 spaces per 100m^2 + 1 lorry space per 750m^2
Retail Warehousing	1 space per 8 employees 10 spaces per 1000m^2	4 spaces per 100m^2	5 spaces per 100m^2
Petrol Filling Station	1 space per 8 employees	1 space per 100m^2	1 space per 100m^2

		+ 1 space per 3 staff on duty	+1 space per 2 staff on duty
Cash & Carry	1 space per 10 employees 5 spaces per 1000m^2	1 space per 100m^2	2 spaces per 100m^2
Restaurant / Cafe / Take-away	1 space per 8 employees 5 spaces per 100m^2	10 spaces per 100m^2 (net)	12.5 spaces per 100m^2 (net)
Crèche / Playschool / Nursery	1 space per 8 employees	1 per employee and 0.25 spaces per child	1 per employee and 0.25 per child
Licensed Premises (including hotel bars)	1 space per 8 employees	10 spaces per 100m^2 (net)	12.5 spaces per 100m^2 (net)
Hospital	1 space per 8 employees 5 spaces per 100 beds	1 space per patient bed + 1 per doctor/consultant + 1 per 3 nursing and ancillary staff	1 space per patient bed + 1 per doctor/consultant + 1 per 3 nursing and ancillary staff
Nursing Home	1 space per 8 employees 5 spaces per 100 beds	0.5 spaces per patient bed + 1 per doctor/consultant + 1 per 3 nursing and ancillary staff	1 space per patient bed + 1 per doctor/consultant + 1 per 3 nursing and ancillary staff
Medical / Dental Clinic	1 space per 8 employees + 1 space per consulting room	1 space per consulting room + 1 per doctors/consultant +1 per 3 nursing and ancillary staff	1 space per consulting room + 1 per doctors/consultant +1 per 3 nursing and ancillary staff
Primary & Secondary Schools	1 space per ~~8~~ 5 employees	1 space per teaching staff	1 space per teaching staff

	1 space per ~~10~~ 5 students	+ 1 space per 2 ancillary staff + additional 15% of staff parking for visitors	+ 1 space per 2 ancillary staff + additional 15% of staff parking for visitors
Universities and other Higher Education Institutes	1 space per ~~8~~ 4 employees 1 space per ~~10~~ 4 students*	~~1 space per classroom~~ ~~+ 1 per 5 students~~ Case-by-case	~~1 space per classroom~~ ~~+ 1 per 5 students~~ Case-by-case
Church, Theatres, Cinemas & Auditoriums	1 space per 20 fixed seats	1 space per 4 seats	1 space per 4 seats
Cultural, Community & Recreational Buildings	1 space per 8 employees 4 spaces per 100m^2	2 spaces per 100m^2	4 spaces per 100m^2
Commercial Leisure (amusement centres, play centres etc)	1 space per 100m^2	2 spaces per 100m^2	2 spaces per 100m^2
Ballroom / Dance Club / Function Room	2 spaces per 100m^2	10 spaces per 100m^2 (net)	12.5 spaces per 100m^2 (net)
Golf Clubs / Pitch and Putt		2 spaces per hole + public space such as bars & restaurants as per the standards in this table	4 spaces per hole + public space such as bars & restaurants as per the standards in this table
Golf Driving Range		0.25 spaces per 0.5m base line	0.5 spaces per 0.5m base line
Athletics / Playing Fields	2 spaces per track/field	5 per track + 10 space per playing field/pitch	10 per track + 10 spaces per playing field/pitch
Tennis Courts	2 spaces per court	1 space per court	2 spaces per court

Bowling Alley	1 space per 8 employees 0.5 space per lane	2 spaces per lane + 1 per 3 staff on duty	3 spaces per lane + 1 per 3 staff on duty
Swimming Pool	1 space per 8 employees 5 spaces per 100m^2	5 spaces per 100m^2	10 spaces per 100m^2
* Refers to fulltime employees and fulltime students.			

1. In the case of any development type not listed in Table A3, the Planning Authority will determine the parking requirement having regard to the traffic and movement generation associated with the development and other objectives contained in the Plan;

2. Where reference is made to floor area, this refers to gross floor area unless otherwise stated;

3. Car parking should be located to the rear of building lines where possible. Large areas of car parking should be accompanied by a landscaping plan to mitigate the visual impact of same;

4. All bicycle parking spaces must be secure. Where multiple bicycle parking spaces are required)e.g. in schools and larger workplaces) the bicycle parking area must be both secure and covered;

5. The car parking requirement for residential developments is a ~~minimum~~ maximum standard ~~and can be exceeded at the discretion of the developer, based on house type, design and layout of the estate~~;

6. In non-residential developments, 5% of car parking spaces provided should be set aside for disabled car parking. Where the nature of a particular development is likely to generate a demand for higher levels of disabled car parking, the Planning Authority may require a higher proportion of parking for this purpose. Disabled car parking spaces should be located as close as possible to the building entrance points and allocated and suitably signposted for convenient access;

7. In non-residential developments, 10% of car parking spaces should be set aside for parent and child car parking. Parent and child parking spaces should be provided as close as reasonably possible to the building entrance points and should be allocated and suitably signposted for convenient access;

8. Age Friendly car parking spaces should generally be provided, where possible, in all developments. These parking spaces should be located as close as possible to the building entrance points and allocated and suitably signposted for convenient access.

9. In rural areas, shared car parking provision for hotel and associated leisure facilities may be considered where these services are shared, so as to reduce a potential overprovision of car parking;

10. In town centre locations, in mixed use development proposals, consideration will be given to dual parking usage, where peak times do not coincide;

11. Where the construction of a new school or child care facility or an extension to an existing school/childcare facility is proposed, the Planning Authority will seek that the provisions of the NTA's Safe Routes to School Design Guide (2021) are applied to the proposal. Provision shall be made within the site for staff parking. Set down areas are not encouraged in close proximity to schools, unless there is no safe alternative area for set down within a short walk e.g. 5mins. This means where cars can park safely, with a footpath link to the school. This includes public residential streets. Schools should promote Park'n'Stride as an alternative. It should be noted that Disabled Persons Parking Spaces and School Bus set down are exceptions and can be provided in close proximity while not impeding pedestrian or cyclist access; ~~require the provision of a lay by or drop off site parking in relation to buses and for parents dropping off and picking up schoolchildren. Provision shall be made within the site for staff parking;~~ and

12.Applicants may propose an alternative parking arrangement to the standards as set out in the parking standards set out in Table A3 for the agreement of the Planning Authority. In the instance a deviation from the standards is proposed the applicant/developer shall submit details of the predicted parking requirements associated with the proposed development and the capacity of the proposed onsite provision to accommodate this demand (including at peak times).

Submission No: S2/630 –Mark Rutledge & Michelle McShortall	
Relevant Chapters / Topics	• **Renewable Energy Strategy** • **Wind Strategy**

Summary of Issues Raised in Submission

This submission relates to Map E – Renewable Energy Strategy and Wind Energy Zone SW of Corofin Village.

- The zone is between 1-2km of an existing designated area (Heritage, SACs & SPAs).
- This is a fragmented site away from existing and strategic areas.
- Not appropriate due to close proximity to those protected areas.

Chief Executive's Response

I thank Mark Rutledge and Michelle McShortall for the submission.

The Wind Energy Strategy is included as Volume 6 of the draft Development Plan and there is a commitment through the inclusion of a specific objective in both the draft Renewable Energy Strategy in Section 6.6 Policy Provision and in Volume 1, objective CDP 11.47 Renewable Energy of the draft Plan to prepare a new Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. The preparation of a new Wind Energy Strategy will involve a review of the exiting WES in developing future policy for the county.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/642 –Fintan & Ruth Quinn	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission is in relation to the creation of a new interchange on the M18 at Quin Road, Ennis as noted in Section 11.2.9.1 of the Draft. A map and supporting documentation is included with this submission. Requests that this proposal should be removed based on:

- Significant impact on residents of Hogan's Way.
- Experience of the non-completion of N18 Ennis Bypass.
- Incompatible design of M18
- Adequate access to M18
- Better alternatives at lower cost and local impact.
- Impact on local walkways.

Chief Executive's Response

I wish to thank Fintan and Ruth Quinn for the submission and address the issues raised below:

The Core Strategy of the draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft Limerick and Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/654 –Seón Ruiz	
Relevant Chapters / Topics	• **Shannon Rail Link**

Summary of Issues Raised in Submission

This submission relates to a suggestion for a railway from Cratloe to Shannon Town and maps are included with this submission.

- New rail line will start with a junction at Brickhill West, Cratloe and run to Bunratty.
- Railway will then cross the N18 and Bunratty river and pass the Shannon treatment plant before crossing to Saints Island to Shannon Airport and then reverse going north toward Shannon Town with station at Industrial Estate (Free Zone) with possibility of extending to Smithstown.
- Constructing the railway along this route will require an embankment from Shannon treatment plant to Airport.
- Embankment will also double as a flood defense.
- The mud flats between old embankment and new could be set up as a nature reserve and part could be extended for a marina, forming a 'Shannon Basin'.
- A flood defense gate could be installed in the embankment where it crosses the river downstream of Bunratty Castle.
- The installation of a weir in Bunratty and the building of a canal to the 'Shannon Basin', along the new railway line.
- This would make a freshwater lake for Shannon and scope for a new tourism business.

Chief Executive's Response

I thank Seón Ruiz for the submission and address the issues raised below.

An Infrastructure Safeguard (Rail) for the Shannon rail link is identified in the draft Plan, and is shown on the Settlement Plan maps (where applicable) and on the county-wide 'Infrastructure, Environment and Flood Risk Zone' maps. The alignment has been included over previous successive County Development Plans.

The mapped alignment corresponds with that of the Shannon Rail Link Feasibility Study, which identified the preferred route for a rail link between the national rail network and Shannon Airport. A rail link to Shannon Airport is supported by Government policy as set out in the National Development Plan (NDP) 2021-2030, and in the infrastructural requirements as identified in the Regional Spatial and Economic Strategy (RSES) for the Southern Region.

Linking Shannon Airport to the national rail network would enhance national and regional connectivity, which is a key strategic objective of the National Planning Framework (NPF).

The draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) is a cross-county Metropolitan scale document which sets out the policies and objectives of the National Transport Authority, Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland at a level appropriate to that scale. The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the Limerick Shannon Metropolitan Area (LSMA).

The draft LSMATS includes a rail link from Limerick to Shannon Town, the Shannon Free Zone and Shannon Airport as part of its proposed Limerick Commuter Rail Network (Phase 2). The following Measure RL3 in the draft LSMATS concerns the rail link:

> Undertake the following in relation to the provision of the Phase 2 Rail Network for the LSMA:
>
> - In cooperation with the Southern Regional Assembly and the local authorities, seek to develop land use policies for implementation via the RSES and Development Plans which focus development in the LSMA, and the wider region, on the rail network in order to deliver Transit-Oriented Development and support further investment in suburban rail; and
> - Examine the feasibility of providing the full commuter rail network for the LSMA, including the re-use of the Foynes and Mungret lines; a new line to Shannon; and new stations at appropriate locations integrated with high density Transit-Oriented Development.

Having regard to the provisions of the NDP, NPF, RSES and LSMATS above, it is clear that linking Shannon Airport by rail to the existing Ennis-Limerick line is envisaged as a component of both a Limerick Commuter Rail Network and as part of the national rail network. The County Development Plan is required to give effect to national and regional-level plans and strategies such as those mentioned.

Therefore, the rationale for retaining the Infrastructure Safeguard (Rail) as mapped in the draft CDP is that it has safeguarded lands for rail connections from Shannon to the existing Limerick-Ennis railway, and that infrastructure for rail travel from Shannon to both Galway and Limerick will continue to be safeguarded.

I note that the submission proposes a rail link along a different alignment to that shown in the development plan. While all viable options would be assessed at the project level, I do note that there are constraints that would be associated with the proposed alignment shown in the submission, such as that the marine and coastal area at Shannon and Bunratty is largely designated as a European Site (the River Shannon and River Fergus Estuaries SPA and the Lower River Shannon SAC), and that it would involve significant construction within the marine area.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/674 –Burren & Cliffs of Moher Visitor Experience Development Plan (VEDP)	
Relevant Chapters / Topics	• West Clare • Tourism • Transport/Traffic

Summary of Issues Raised in Submission

This submission relates to the Burren & Cliffs of Moher. The key issue raised is the environmental pressures during peak periods such as congestion, infrastructural problems, and the lack of transport management

The issue is wider than tourism and needs to be addressed in a more comprehensive way to include tourism, community planning, environment, industry, and infrastructure.

- Proposes the development of an integrated traffic and transport strategy for North Clare to be included as an objective in the Plan.
- Objective could be included under CDP9.24 Tourism in North Clare and Burren
- To incorporate and link to other objectives relating to transport, rural development, sustainable communities, retail and physical development.

Chief Executive's Response

I thank the Implementation Committee for the Burren and Cliffs of Moher VEDP for their submission, and I wish to respond as follows.

Clare County Council are fully aware of the ongoing traffic and transport issues across North Clare which peak during the high tourism season of the summer months. The forthcoming Cliffs of Moher Strategy 2040 together with the Corofin Enhancement Strategy, which Clare County Council are jointly preparing with the National Parks and Wildlife Service and Failte Ireland seek to address gaps that have been identified in the tourism experience within the Burren and the north Clare area including parking issues and visitor management. These strategies are building on the Clare Tourism Strategy 2030 which was launched in April 2021. It is anticipated that these strategies together with other private and public initiatives will help assist in alleviating some of these issues raised in this submission. I consider that until such time as the Cliffs of Moher Strategy 2040 and the Corofin Enhancement Plan are completed and progress made regarding their implementation it is premature to consider the preparation of any additional Integrated Traffic and Transport Strategies for North Clare.

Tourism is central to the economy of the North Clare and Burren area and for that reason I consider that all proposals for tourism development must have regard to the various objectives in the plan (not just those specific to tourism) relating to transport, rural development, sustainable communities, retail, physical development amongst others. I do not consider it necessary that specific cross-reference is made in that regard.

Chief Executive's Recommendation
I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/683 –Michael Leahy	
Relevant Chapters / Topics	• **Urban & Rural Settlement Strategy**

Summary of Issues Raised in Submission

This submission refers to the Urban and Rural Settlement Strategy with reference to the areas designated as being of "special control"

- Areas of special control as indicated on map number 4B have considerably increased in Draft Plan.
- The total of these areas now constitute some 80% of the land area in the county.
- Those few areas which are not designated as areas of special control are further delimited by presence of scenic routes or national primary and secondary routes.
- No explanation as to why the areas of special control have significantly increased since the current Plan.
- No recognition within the Plan of important tradition of dispersed housing.
- The proposed extension of the zones of special control will make it difficult in seeking houses in those areas.
- Requests that the areas of special control return to same geographic areas as those in the current Plan.

Chief Executive's Response

I thank Michael Leahy for the submission.

The designation of rural areas under strong urban influence within the draft Development Plan is a requirement under NPO 19 of the National Planning Framework which is to *"Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere".*

In line with this requirement and as set out in Volume 1 Written Statement of the draft Development Plan, Chapter 4 Urban and rural Settlement Strategy the Planning Authority applied an evidence-based approach to the development of the rural housing policy. This took account of the NPF objective referencing the use of commuter catchments to distinguish between rural areas under urban influence and elsewhere, along with other 'local 'factors' which are specific to the county's own unique characteristics and not provided for by analysis based purely on commuter catchments which were applied and included the following:

- An analysis of commuter catchments for the main employment centres of the town of Ennis and both the Limerick-Shannon and Galway Metropolitan Areas
- The analysis and mapping of data on the number of planning applications for single rural houses submitted over the past 10 years
- An analysis of Census data for 1996, 2006 and 2016 to identify areas experiencing population growth, stagnation and decline.
- An analysis of population density

- An analysis of the County's Environmental, Scenic and Heritage Sensitivities.

I am satisfied that the policy as set out in the draft Plan aligns with the national policy as set out in NPO 19 of the NPF.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/684 –Orsted	
Relevant Chapters / Topics	• **Renewable Energy** • **Wind Energy Strategy** • **Climate Change**

Summary of Issues Raised in Submission

This submission relates to renewable energy, specifically to designation areas for wind energy generation, repowering of wind farm sites and concerns that the Wind Energy Strategy has not been reviewed as part of this process.

General Comments

- Aside from the fact that the Government Guidelines for Wind Energy Strategy (WES) has yet to come into effect the Council should have undertaken a review of the WES for a more complete Draft Plan.
- Important that the Council begin identifying opportunities to improve the identification and application of strategic wind energy designations for next 6 years.
- The establishment of low carbon economies through increased efficiency of renewable energy generation is a time for critical consideration which should underpin the Draft Plan review.
- Ensure a robust framework exists to guide future wind energy development.
- Highlights the importance, as set out in National Planning Framework, to reduce gas emissions from the energy sector by at least 80% by 2050.

Written Statement

- Welcomes the inclusion of onshore wind as a renewable energy resource with a target of 550MW to 2030 and Objective CDP2.1.
- The clear confirmation for the continued deployment of wind energy addressed at section 8.3.4 of Chapter 8 of the Draft is welcomed.
- Section 8.3.4 refers to areas suitable for commercial wind energy development being set out in Volume 6 of Plan. This reference should be amended to address the fact that Volume 6 has not been updated as part of this Draft review.
- It is therefore requested that Section 8.3.4 is updated as follows:
  "Areas that are considered suitable for commercial wind energy developments are set out in Volume 6 of this Plan which will remain in force until 2027, or an earlier date should the Wind Energy Guidelines be finalised and adopted at which stage Volume 6 will be revisited."
- This also requires to be reflected in CDP8.12.
- Welcomes Section 11.8.3 (Electricity Networks) and the ongoing close working relationship between Council and EirGrid.
- Section 11.8.5 (Renewable Energy Sources) to be amended to read:
  "*upon the adoption of the update to the Wind Energy Guidelines for Planning Authorities 2006. Until that time, the existing WES included here at Volume 5 will be utilised in considering wind energy development proposals."*
- Also welcomes CDP 11.47(d) regarding the update to the WES and the note of support for the development of a Regional Renewable Energy Strategy CDP11.48.
- Wind energy development will reduce the dependency of 65% on imported energy.

Renewable Energy Strategy (RES) – Volume 5

- Welcomes that the 2030 targets are not to be viewed as caps or limitations and Objective RES 3.1 meeting the county's energy needs from 100% renewables.
- Chapter 6 of the RES relates specifically to onshore wind it is requested that Section 6.1 is amended to note that the WES is to be updated following adoption of the Wind Energy Guidelines.

Repowering

- Section 6.5 of RES is only part of the Draft that refers to repowering potential for wind farm sites.
- There is a need for clarity regarding the policies and approach to repowering that will be contained within the reviewed WES for prospective applicants.
- Highlighting the warning point issued in IWEA's More Power to You: A Guide to Repowering in Ireland (2019).
  "To reach its 70 per cent renewable electricity target by 2030, Ireland cannot afford to needlessly lose capacity through avoidable decommissioning or have a large percentage of the fleet operating inefficiently because of a lack of Government policy to support repowering. Repowering can be a key enabler for Ireland reaching its 2030 targets by increasing our renewable energy production, and it has a host of associated benefits."
- Would welcome guidance as to the repowering policy and the approach to repowering in Plan.

Chief Executive's Response

I thank Orsted for the submission.

In accordance with the requirements of the Department of Environment, Community and Local Government as set out in Circular PL20-13, the existing "Clare Wind Energy Strategy 2011-2017" has not been reviewed as part of the preparation of the draft Plan. As per draft RES section 6.6 Policy and in the draft Plan Volume 1, Chapter 11 Physical Infrastructure, Environment and Energy, Objective CDP11.47 Renewable Energy, specifically "d) To prepare a new and updated Wind Energy Strategy for County Clare during the lifetime of this plan, subject to the publication of the update to the *Wind Energy Development Guidelines for Planning Authorities 2006",* the planning authority sets out its committed to reviewing the WES once the new National Wind Energy Guidelines are issued. I consider this provides sufficient referencing in the draft Plan.

The review of the WES will explore opportunities for effective repowering of existing assets to ensure the existing infrastructure is used as efficiently as possible.

Under Climate Action Plan 2021, Action 102 seeks to publish a framework to set out targets for onshore renewable electricity development to inform spatial plans. This process will translate national objectives into regionalised targets for the Regional Assemblies, which will be realised through the Local Authorities.

Chief Executive's Recommendation
I recommend no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/699 –ICMSA	
Relevant Chapters / Topics	• Agriculture • Housing • Climate Change • Flooding and River Maintenance • Economy and Employment • Retail Strategy • Infrastructure • Heritage

Summary of Issues Raised in Submission

The Clare County Executive of the Irish Creamery Milk Suppliers Association (ICMSA) has made a submission under a number of headings.

Housing:

There should be no restrictions on rural one-off housing, particularly for farming members and those local to a region. Services (rural roads, water services, waterway maintenance) must be improved. Improved broadband internet services are essential to afford people the opportunity to work from home and to sustain rural communities. Vacant units in towns and villages should be prioritised in relation to urban development to increase housing availability and to bring economic activity back to town centres.

Climate Change:

Farmers should be encouraged to install solar panels and infrastructure. Planning laws should exempt solar panels from requiring planning permission.

Flooding and River Maintenance:

A river maintenance programme should be included in the CDP, this would positively impact flood management, water quality and prevent water damage to homes proximate to rivers. Landowners should be notified prior to any river maintenance works near their land. An annual budget should be dedicated for this programme.

Sustainability Goals:

In order to support farming in rural Clare, social, economic as well as environmental aspects to farming should be supported in the CPD.

Economy and Employment:

Specific initiatives to strengthen the rural economy and communities are required. Employers should be encouraged to facilitate remote working (from employee's homes or from community hubs) where possible. Farmers should be exempt from standard development charges on any on farm investments that positively contribute to the environment.

Retail Strategy:

Focus on making the environment of the town centres more attractive to encourage business to set up and people to live and work there. Specific units should be eligible to pay lower rates if they are beneficial to raise the profile of the town centre. The ICMSA supports the objectives of

the CDP to support farm-based shops and to support the development of farmer markets.

Infrastructure:

Priority investment is required to the water and wastewater infrastructure in rural Clare, given the issues of water shortage in 2021. Road infrastructure needs to be greatly improved and maintained to encourage people to live in rural Clare and to combat rural decline. People in rural Clare need to see a return on their property tax.

Transport and Mobility:

Improvements in public transport in rural areas is required to facilitate people to live in rural villages and commute to nearby towns/cities.

Heritage:

Grants to be provided to farmers to restore traditional farm buildings, other than the GLAS grant which has a limited budget. The Council should play a role in the restoration of old farm buildings.

The ICMSA has offered to meet with Council officials to discuss the draft plan and the submission made.

Chief Executive's Response

I wish to thank the ICMSA for their submission.

Housing

County Clare has a long tradition of people living in dispersed settlement patterns in the

countryside where areas such as rural townlands remain as important units of identity. The Council will continue to support this tradition in a positive manner that is consistent with the requirements of the National Planning Framework, the Regional Spatial and Economic Strategy for the Southern Region and the Section 28 Ministerial Guidelines 'Sustainable Rural Housing - Guidelines for Planning Authorities (DoEHLG)'.

Access to high quality broadband is a fundamental requirement for the economic prosperity and social development of rural areas and given the rural nature of the majority of County Clare the implementation of the National Broadband Plan (NBP) is essential. The Draft Plan supports the expedited delivery of Rural Broadband as set out in Objective CDP8.7. To further support broadband in rural areas DigiClare is an initiative of Clare County Council that was established on foot of its rural development strategy, *Clare Rural Development Strategy 2026*, to support rural communities by providing flexible, affordable, and local office facilities and highspeed broadband connectivity in rural locations in the County. These digital hubs utilise broadband and digital technology as a key enabler of rural development and support rural social enterprises and the wider community by facilitating e-working, small-scale training and conferencing. There are digital hubs currently located in Ennis, Cross, Carron, Corofin, Ennistymon, Feakle, Kilfenora, Kilkee, Kilrush and Miltown Malbay with additional locations planned.

Throughout the plan there is strong policy support to prioritize the reuse of existing housing stock in the Plan area and the renovation and re-use of obsolete, vacant and derelict homes. In particular Objective CDP5.2, Facilitating the Housing Needs of the Population supports this and it is a strategic aim of Chapter 17 Towns and Villages , "To achieve the beneficial reuse of vacant,

derelict or under-utilised sites, particularly the identified Opportunity Sites.

Climate Change

The Draft Plan has a strong cross cutting focus on Climate Action. I concur that farmers, businesses, and the general public should be encouraged to install micro renewable technologies. In this regard there are planning exemptions as set out in the Planning and Development Regulations 2001 as amended for the installations of solar panels and other micro-renewables. The Planning Authority will be supportive of larger arrays that would require planning permission, subject to normal planning and environmental criteria.

Flooding and River Maintenance

River maintenance is separate from Planning Legislation and is governed by the Arterial Drainage Acts amongst others. The OPW is the lead Authority in this regard and accordingly is outside the scope of the Development Plan.

Sustainability Goals

The economic and social importance of agricultural activity in the county its spin off industries is recognised by the Draft Plan, in particular in Chapter 6, Economic Development, Sections 6.20 Agricultural Development and 6.21. Rural Enterprise, Chapter 8, Rural Development and Natural Resources.

Economy and Employment

Specific initiatives mentioned in this regard are operational issues outside the scope of the Council in some instances and fully outside the scope of the Development Plan.

Retail Strategy:

There is a strong focus throughout the Plan on town centre first initiatives, public realm enhancement, reuse of vacant buildings, and active travel which will all enhance the opportunities within town centres as well as the physical environment makes these locations more attractive to do business, live and visit.

Infrastructure:

Water and wastewater infrastructure is under the management of Irish Water and Clare County Council continue to liaise with Irish Water on an ongoing basic to achieve the best possible outcomes for County Clare. Road maintenance is an operational issue and outside the scope of the Development Plan.

Transport and Mobility:

I concur that rural transport is vital for County Clare as set out in Section 8.2.7 of the Draft Plan and Objective CDP8.6 Rural Transport provides support for existing and improved rural transport services.

Heritage:

In relation to restoration of traditional farm buildings, in addition to the GLAS fund there is also the Historic Structures fund – Venacular Stream, provided by the Department of Housing, Local Government and Heritage. However, this is an operation issue and outside the scope of the Development Plan.

Chief Executive's Recommendation
I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/702 –Una Kierse	
Relevant Chapters / Topics	• **Killaloe** • **Parking** • **Tourism**

Summary of Issues Raised in Submission

This submission is in relation to access to Brian Boru's Fort, Scariff Road, Killaloe, for cars and buses in particular, and there is no map included with this submission.

- Due to upcoming works with Shannon crossing and the bypass would suggest it is a good time to provide safe access;
- Limited edge of road parking for cars and buses on a very busy road with 80kph speed limit;
- Safety concerns for parking, crossing and queueing to enter fort. A car park adjacent would be ideal.

Chief Executive's Response

I wish to thank Una Kierse for the submission and address the points raised as follows:

- The Killaloe Bypass project has moved into its construction phase in recent months, with the awarding of the construction contract. It is not possible at this stage to revisit the design stages of the project to seek changes that might assist accessibility to Brian Boru's Fort;

- The establishment of car-parking immediately adjacent to the Fort is not within the remit of the Development Plan because the site of the Fort is not within the settlement boundary of Killaloe and therefore zoning the site for a car-park would not be possible.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/704 –Cunnane Stratton Reynolds on behalf of Newmarket on Fergus Community Forum	
Relevant Chapters / Topics	• **Written Statement** • **Vision and Goals** • **Core Strategy and Settlement Hierarchy** • **Urban and Rural Strategy** • **Limerick Shannon MASP** • **Economic Development** • **Tourism** • **Sustainable Communities** • **Newmarket on Fergus**

Summary of Issues Raised in Submission

The submission relates to Newmarket on Fergus and its aim is to align the findings and recommendations of the recently completed Community Plan with the Draft Plan. Reference is made in the submission to national and regional planning policy and in this regard a number of requests are made as follows:

Volume 1

Section 1.5 The Vision

Supports the emerging vision and seeks to have that vision strengthened with additional text in bold below. It should retain key elements of the former vision set out in the adopted County Plan and in particular the following text in bold should be re-instated or incorporated from the previous vision:

"That County Clare would develop as a place to be part of and proud of, where urban and rural communities enjoy a high quality of life, work practice choice, inclusivity and service access and so that the county is a dynamic, resilient, connected and internationally competitive location for innovation and investment and is a national leader in climate action, creativity, culture, heritage, tourism and environmental management."

It is envisaged that this will be achieved ***through maximisation of Newmarket on Fergus' unique characteristics, strengths, location and connectivity.***

Section 1.6 Goals

Supports Goals I, II, V, VII, IX, X and XIX expressed in Section 1.6.

Section 2.7.2 (Core Strategy)

Considers CDP 2.4 Smart Growth should not be confined to only urban areas and suggests the following proposed change, with additional or new text as set out in bold below:

"It is an objective of Clare County Council: To support smart growth initiatives that develop new solutions to existing and future urban ***and rural*** *challenges, including climate risks in the County and to seek climate and smart technology funding in this regard."*

Section 3.4 Settlement Hierarchy

Requests for elevation of the town from *Small Town* to ***Service Town*** spans one level of the settlement hierarchy as indicated below, for the following reasons:

- Identified Service Towns are predominantly clustered or effectively twinned, Newmarket on Fergus has the critical mass, urban form, infrastructure and population to merit inclusion on its own.
- The town's population exceeds Ennistymon/Lahinch and Scarriff/Tuamgraney.
- The identified Service Towns are existing tourist centres. Existing features in and around Newmarket on Fergus have already, or have the potential to be, significant tourist attractions e.g. Dromoland Castle and golf course, Mooghaun Hill the disappearing lake at Lough Gash and Mid Clare Walkway providing for the clustering of tourism attractions and activities in much the same way as the coupling of existing *Service Towns* such as Scarrif/Tuamgraney.
- The town is located on the N18 in proximity to Bunratty and Shannon Airport and is perhaps the most accessible town in the county.
- The town is close to Shannon Airport, Limerick City and the county town of Ennis with reciprocal benefits in terms of investment, tourist footfall likely to positively impact on these centres also and vice versa.
- In close proximity to the West Clare Greenway, starting from Kilrush to Kilkee with potential to be extended to Newmarket on Fergus.
- The primary function of *Service Towns* is the provision of convenience goods and everyday services as per Section 7.3.3 and there is a need to upgrade everyday services if Newmarket on Fergus is going to reach its population and tourism potential thereby making it a more attractive place to live, work, and visit.
- *Service Town* designation would help ensure retention and improvement to services such as An Post, utility provision, banks and would accentuate the advantages of the town being in the Limerick Shannon MASP

Where *Service Town* designation is achieved any tourist and visitor function such as at Ennistymon and Lahinch would allow some provision of comparison retailing which would benefit the town considerably. Newmarket on Fergus has untapped tourist resources. It needs services and amenities to develop these.

Limerick Shannon Metropolitan Area

Requests the inclusion within the Limerick Shannon MASP area or that additional text is include in the Plan supporting Newmarket on Fergus' inclusion within the MASP defined area for the medium to long term, for the following reasons:

- The town would appear to be located within or on the very edge of the MASP area and is located a short distance from Shannon, which is included within the MASP area, and sufficiently far away from Ennis, which is not included within the MASP area.
- The relatively short distance from Limerick City and Shannon as the focus of this particular MASP and location just off the N18, linking all 3 strategic locations.
- The town is as convenient if not more convenient both Shannon and Limerick City than Sixmilebridge which is located a further considerable distance away from the N18.
- The town is functionally part of the Limerick City and Shannon MASP and is located within the Atlantic Economic Corridor.

- Highly desirable from the County's perspective to have an additional Clare settlement included within the MASP area.
- South RSES will likely be reviewed after a 6 year midpoint period and it would be essential that the Newmarket on Fergus case for inclusion in the MASP area be made.

CDP6.1 Economic Development and Enterprise

Supports this objective and considers the development of the food sector must be encouraged and should be specifically mentioned in this Objective.

CDP6.2 Mid-West Regional Enterprise Plan

Requests CDP6.2 is amended so that it specifically mentions local community groups and representatives such as the Community Forum. CDP6.2 should now read:

"To collaborate with all relevant stakeholders including local community groups in proactively progressing the delivery of the actions set out in the Regional Enterprise Plan (or any updated/superseding plan)."

CDP6.3 Atlantic Economic Corridor

Fully support the development of the Atlantic Economic Corridor and also *Objective CDP6.3* subject to suggested additional text as indicated below in bold.

"To support the development of the AEC initiative as a driver of enterprise, growth, investment and the attraction of entrepreneurial skills and talent along the Western Seaboard ***and in adjacent communities****, and to work with key stakeholders* ***including local community groups and*** *adjoining local authorities to optimise the combined advantages and opportunities of the AEC including delivering a high-value and low-carbon economy."*

CDP6.7 Higher Education Institutes and the Knowledge Economy and CDP6.11 Research and Innovation

These objectives are supported.

Section 6.13 Digital Hubs

Supports Development Plan Objective CDP6.12 Clare Digital Hub Network and requests Newmarket on Fergus included as one of the Digital Hubs in the County and would point out that the town is at least as deserving as those listed in Section 6.13 for the following reason:

- Existing available and modern workspaces available at Tradaree and these would become more attractive for business and start up use if the town were designated as a digital hub. Those supporting services to employment uses such as retail would be greatly encouraged through designation of the town also as a service town

Request that Newmarket on Fergus is included in the list of locations identified under Section 10.19 *"The Council, through the Digi-Clare initiative, has provided remote working and hot desk facilities that are broadband enabled at a number of locations across the County including Ennis, Cross, Carron, Corofin, Ennistymon, Feakle, Kilrush, Kilkee and Miltown Malbay."*

CDP6.21 The Food Industry

This objective is supported.

Tourism Recovery Plan 2020-2023 and the Clare Tourism Strategy 2030

Considers the aims and objectives of the Tourism Recovery Plan 2020-2023 and the Clare Tourism Strategy 2030 must be incorporated more vigorously into the forthcoming development plan tourism policy and requests that the following additional text in bold is added to Section 6 of the Draft Plan to reflect the challenges and opportunities identified by the Community Forum in respect of economic development and tourism:

- ***There is a need to further foster connections and linkages between existing and proposed or emerging tourism areas and assets to build on the establishment of tourism experiences where visitors are offered a complete experience that ultimately encourages longer stays. The area around Newmarket on Fergus is relatively unexplored and promoted.***
- ***There is a fundamental link between tourism and many other sectors which needs to be acknowledged in the draft plan, which should result in an increase in the level of policy cross-compliance and consideration of potential benefits and impacts on tourism in the development of policy. The food sector requires its own objective and the opportunity presented for cookery schools, links to educational establishments, the social dynamic of providing meals and also the possibility for a different dynamic to the food experience namely food trucks and wagons ie https://roaminghunger.com/. Food trucks and wagons should be identified as that extra dynamic for food lovers as the potential exists to develop the existing centre of cooking excellence and fine dining experience at Dromoland Castle with Obairs Meals in Wheels initiative, the provision of a cookery school at Tradaree which could be used as a service area or point for travelling food wagons and trucks running between Limerick and Galway and even Limerick to Ennis. A wide ranging and socially inclusive dining experience could form the basis of a tourism 'niche activity' for Newmarket on Fergus as per 9.12.2. Newmarket on Fergus has numerous potential locations and the capacity to contribute positively to food tourism in the area and social media platforms in this industry are very suited to spread relevant information, to residents and visitors alike.***
- ***The location of the town is unmatched by any other settlement in the county of its approximate size in terms of its accessibility on the N18 and to the broader strategic road network and its proximity to Shannon airport, Limerick City and Ennis. That strategic accessibility has so far been relatively untapped.***
- ***The tourism sector is particularly dependent on a high-quality road network and good quality public transport. A priority should also be to provide targeted improvements to public transport options for visitors. The current bus network is not sufficiently frequent.***
- ***Enhanced walking and cycling infrastructure are also important to utilise resources and improve accessibility as well as encourage healthy activities. The plan should include policies that continue the support for the development of greenways, blueways, walkways and cycleways across the county to encourage sustainable activity tourism.***
- ***The emerging County Development Plan talks only generically about greenways and should prioritise the delivery of the Greenway from Kilrush to Kilkee and investigate the viability of the Greenway between Kilrush/Kilkee to Ennis and further consider the opportunity for an extension to Newmarket-on Fergus.***

CDP10.3 Voluntary and Community Groups, CDP10.7 Community Facilities, CDP10.10 Physical Recreation and Active Living, CDP10.11 Recreational Routes & CDP17.12 Community Activity

These objectives are supported.

Tourism

Supports the vast majority of objectives and statements in relation to Chapter 9 Tourism.

CDP9.8 Activity and Adventure Tourism

Requests that reference is made in this objective to ***prioritisation of the delivery of the Greenway from Kilrush to Kilkee and further investigation of the viability of the Greenway between Kilrush/Kilkee to Ennis and further consideration should be given to the opportunity for an extension of any greenway to Newmarket on Fergus.***

Considers the feasibility of extending the Greenway concept from Ennis to Newmarket on Fergus should be explored further and the opportunities for further linkages between cycling and walking routes. Various recreational routes along the western coastline either pass through Newmarket on Fergus or pass it in close proximity including European Veloroute 1, the general Mizen Head to Malin Head cycle route, the Wild Atlantic Way and Cycling Ireland's 4 Doolin loops. All of these create positive

spill over effects which are beneficial for Newmarket on Fergus to attract additional visitors/tourists (a map identifying same is provided).

Map of Tourism Routes

Considers the potential for Greenways is completely underestimated in the emerging Plan and requests that a consolidated map of walking and or cycle routes for what is a dynamic and growing sector of the tourist economy is included.

CDP9.11 Arts, Crafts and Food Tourism, Section 9.2.16 Festivals and Events, the acknowledgment of the importance of niche tourism markets set out in 9.2.19 & CDP10.5 Inclusivity and Equal Access

These objectives and sections are supported.

The Community Forum fully supports Section 9.2.16 (Festivals and Events) as an essential

element of a successful tourism product with additional text suggested below in bold. They support in particular Development Plan Objective *Festivals and Events CDP9.15* where it is an objective of Clare County Council:

"a) To support and promote the existing festivals and cultural events which take place

in the County and to facilitate the establishment of new events;

b) To promote County Clare as a 'County of Culture';

c) To support community groups and festival committees to identify and access new

sources of funding for festivals and events in the County;

d) To promote the development of a variety of new festivals and sporting events to

appeal to a wide range of visitors and to increase the profile of the County as a key

tourism destination;

e) To ensure that areas of open space are available to host such events - Such

areas should be centrally located within town and village centres and may be

established for dual or multiple use as occasion or needs demand."

Volume 3 Newmarket on Fergus Settlement Plan

Location and Context

Requests the insertion of the following text in this section and notes the Community Plan is attached to the submission:

"The town has an active association of community groups that have been successful in delivering developments and services over a period of several years and reference should be made to the town Community Forum Development Plan for more detailed proposals on environmental upgrade and

infrastructural improvements."

Employment and Enterprise

Requests that in this section reference is included to the town being located within the Atlantic Economic Corridor and a short distance away from the Limerick Shannon MASP and that reference to the unsurpassed access to the N18 is highlighted.

Supports the objective *"To promote enterprise and indigenous employment generating development in the town." And requests that the following objectives are included:*

- ***Seek to include the town as a digital hub;***
- ***Seek to develop a tourism niche based on excellence in and participation in food based niche activities and events, from fine dining to meals on wheels, and to link with cooking schools including LIT utilising existing and bespoke premises established for that purpose and ensuring that recent innovations in mobile cooking and dining such as food wagons are facilitated given the proximity of the town to the N18, Limerick, Shannon, and Ennis and beyond to Galway.***
- ***Create synergies with Dromoland Castle and seek to develop tourism offers in the area including at Mooghaun Hill Ring Fort and incorporating Lough Gash.***

Commercial/Mixed Use

MU-2 Adjacent to the Town Centre

The County Council will seek with key stakeholders to extend town centre activities to the south west in close proximity to the Waste Water Treatment Facility. Seek to facilitate with Clare County Council the removal of the outer gate to the Treatment Facility to facilitate further public access to this part of the town and to facilitate improved linkage to Kilnasoolagh Park and on to lough Gash. This will involve improved lighting and resurfacing of existing footpaths and the enhancement of the main car park opposite the town library.

Transportation, Active Travel and Connectivity

Notes the Community Forum is undertaking a masterplan for the town and this could be referenced in this section. Also requests reference to the following is included in the Plan (as identified on submitted map):

- ***Creation of a circular pedestrian route effectively encircling the town centre***

- ***General enhanced pedestrian access from the town centre core at Ennis Road where retail facilities are concentrated to Lough Gash via Kilnasoolagh Park.***
- ***Improve pedestrian/cycling access from Nurseries Lane and O'Regan Park to Lough Gash as part of the overall circular loop around the town.***
- ***In considering the above public access and pedestrian enhancements create a resurfaced more inviting pedestrian/cycling link via Mill Passage (gap at the corner of Ennis Road)***
- ***In this location on Ennis Road consider the removal of existing on street car parking and the design of a pedestrian friendly town square.***
- ***Reconsider the need for a second outer gate to the existing sewerage treatment plant which if removed would open up an area that we have identified as a grassed small island where the River Fergus splits as this area is considered a major recreational asset to the town and a vital link in the town loop walk route.***
- ***Upgrade car park at Kilnasoolagh Park to serve those visiting Lough Gash and O'Regan Park and those visiting the town centre including adjacent shops.***
- ***Significant resurfacing, repaving and public lighting and greening is anticipated in the area between the lake and Ennis Road.***
- ***Provision of a cycle lane from Dromoland Castle to the town to complement any Greenway should it be provided from Ennis to the town centre.***
- ***Support the undertaking of a feasibility study to consider the potential for extension of any Greenway at Ennis to the town centre.***
- ***Consider the provision of a car park in close proximity to the school, soccer club, Garda station and Spar shopping centre with facility for bus parking and incorporation of a bus shelter.***
- ***Consider the visual enhancement of the Ennis Road green strip between Kilnasoolagh Park and Loughash Road to create a comfortable and safe linear park***
- ***Consider the visual enhancement of the GAA wall along Ballycar Road with either public art, greening or physical openings, possibly a combination of these.***
- ***Provide bus shelters where appropriate.***
- ***Consider provision of a car park for the town on the southern approach into the town***
- ***Centre.***
- ***Consider provision of a pedestrian/cycling link to O'Regan Park on the southern approach into the town centre.***
- ***Strengthen the 50km/h speed limit for the outer town limit and consider the introduction of a 30km/h zone for the town centre in order to enhance walking/cycling/events and general public amenity.***

<u>Placemaking and Regeneration</u>

Suggests that existing references to enhanced pedestrian access to Lough Gash be taken a step further by annotation on the zoning map of a tourist information point to include information boards, seating, the removal of existing railing and the provision of entrances and footpath closer to the water's edge but within a reasonable distance to the water's edge to protect biodiversity and the status of the Lough Gash Special Area of Conservation (SAC), the Lower River Shannon SAC and River Shannon and River Fergus Estuaries Special Protection Area (SPA).

Further suggests that the car park within Kilnasoolagh Park of approximately 25 spaces found in close proximity to the town library be enhanced and used as a designated public car park which would take parking pressure of Ennis Road a short distance away. This might facilitate the removal of cars between Varden Pharmacy and All Bar One Racing. The provision of a relatively large

amount of parking in this location would facilitate visual enhancement of this area along with reworking and replanting of adjacent public open space.

Notes/requests the existing town library will be upgraded.

Architectural Conservation Area (ACA)

Supports this designation.

Open Space

Acknowledges the town is well provided for in terms of recreation space and informal open space which is accessible to the public and that pedestrian access to the lake from the town centre needs to be greatly enhanced as noted in the Plan.

Notes that the reference to the open space around Lough Gash being in private ownership and not accessible to the public is incorrect. This is the case for the majority of the area around the lake but not along the westernmost edge of Kilnasoolagh Park nearest the lake (shown as OS3) which is believed to be in Clare County Council ownership.

Refers to proposed works to this area (requested under 'Transportation, Active Travel and Connectivity' above) are a sufficient distance from the water's edge of Lough Gash would include an information board, seating, removal and replacement of wall and railing with a more aesthetically pleasing barrier with enhanced access in and a footpath taking visitors closer to the lake.

Considers that opportunities exist for enhanced public open space and access to that space to the south west in close proximity to the existing waste water treatment plant.

Chief Executive's Response

I wish to thank Cunnane Stratton Reynolds on behalf of Newmarket on Fergus Community Forum for their very detailed submisison and I respond as set out below.

The vision as set out at the in Chapter 1 of the Written Statement is a common vision for the County and it would be completely inappropriate and unwarranted to single out Newmarket on Fergus in the vision as requested by the addition text provided.

Smart Growth as a term relates to the urban context rather than a rural context. Smart growth concentrates growth in a compact walkable urban centre to avoid sprawl. It seeks to achieve mutual consistency between land use and transport planning, investment, and service provision. CDP2.4 relates to smart growth and correctly cites urban challenges to include "rural challenges" as requested in the submission would be misleading having regard to the context of the smart growth term.

identify the relationship between development patterns and quality of life by implementing new policies and practices promoting better housing, transportation, economic development and preservation of environmental quality. Smart Growth on the Rise.

Elevating the town to Service Town Status

The Settlement Hierarchy as set out in Table 3.1 of Volume 1 was developed to take account of the role of each settlement. The settlement Hierarchy is a spatial expression of sustainable population distribution, settlement order or level and settlement role. The categirisation of towns

within the settlement hierarchy is not purely a factor of population, the submission states "From a population perspective the elevation of the town to the 'next level' is fully justified". Other factors to be considered is the spatial distribution of the service towns, the rural hinterland to which they serve and that there development wound not compromise the development of nearby higher order settlements where population growth should be targeted. Newmarket on Fergus is situated near the Metropolitan Town of Shannon and its role into the future is to continue as an important local service centre rather and compete with Shannon or Ennis. I can see no justification to change the status of Newmarket on Fergus in the Settlement Hierarchy.

Limerick Shannon Metropolitan Area

Newmarket on Fergus is located outside the Limerick Shannon Metropolitan Area. The identification of the Metropolitan Area was decided in the Regional Spatial and Economic Strategy for the Southern Region and the County Development Plan must sit in line with the Regional Strategy. Ant future changes to the Metropolitan boundary is not a matter for the CDP.

CDP6.1 Economic Development and Enterprise

I agree the food sector should be specifically mentioned in this Objective CDP 6.1 as follows

f) To support the development of innovation hubs and centres of excellence (with particular opportunities for innovation in areas such as agri-food, agri-tech, marine research, creative industries, food manufacturing and the knowledge economy) as local drivers for growth.

CDP6.2 Mid-West Regional Enterprise Plan

I believe relevant stakeholders is sufficient and I do not support mentioning one group (ie Community groups) over other relevant groups.

CDP6.3 Atlantic Economic Corridor

Noted, as above I believe key stakeholders is sufficient and I do not support mentioning one group (ie Community groups) over other key stakeholders. The AEC initiative covers all of County Clare and I see no justification to include "and in adjacent communities" in CDP 6.3.

CDP6.7 Higher Education Institutes and the Knowledge Economy and CDP6.11 Research and Innovation

Noted

Section 6.13 Digital Hubs

Noted, at present there are no plans in place for a digital hub in Newmarket On Fergus, however it should be noted that there is a hub in Ennis and Shannon. CDP6.12 supports the continued development of the network of digital hubs and any future location will be determined on case by case basis.

CDP6.21 The Food Industry

Noted

Tourism Recovery Plan 2020-2023 and the Clare Tourism Strategy 2030

Chapter 9 includes an entire Chapter on Tourism; the Tourism Recovery Plan is 2020-2023 and the County Development Plan is 2023-2029. The Draft CDP has incorporated the County Clare Tourism Strategy and CDP 9.1 is explicit in its support of the implementation of the strategy.

CDP9.11 supports the development of the arts, crafts and food tourism sectors and work in

coordination with relevant stakeholders to facilitate growth in these sectors.

Active travel and sustainable transport options are a cross cutting theme across the County Development Plan with appropriate objectives in Volume 1 and in Volumes 3 settlement statement as appropriate.

In relation to Greenways, the West Clare Railway Greenway is supported across the Draft Plan is identified on Volume 2 maps there also significant emphasis on Recreational Routes around the County.

Volume 1, Appendix 6 Map 6.2 identifies Recreational Routes across the County including the EuroVelo Route.

The settlement statement for Newmarket includes an objective

- To explore the completion of the cycle way linking Ennis to Bunratty via Newmarket -on Fergus

I consider that the settlement statement should also include reference to the Euro Velo route passing through the town.

Section 9.2.16 Festival and Events

I do not believe it appropriate to include the suggested text as set out below into CDP 9.15

e) To ensure that areas of open space are available to host such events – Such areas should be centrally located within town and village centres and may be established for dual or multiple use as occasion or needs demand."

Such spaces will organically be created through public realm enhancement projects and may or may not be appropriate to host festivals and events, this would be a case by case scenario rather than a general objective.

<u>Newmarket on Fergus Settlement Plan – Volume 3</u>

See earlier response as to the designation of the Limerick Shannon Metropolitan Area, digital hubs.

In relation to the Tradaree Project, I consider this should be mentioned in the settlement statement and given general support.

Preliminary design concepts for the Newmarket on Fergus (Lough Gash) ORIS are currently being developed which facilitate a level of access to the Lough and gaining access via the treatment plant and to develop a recreational route around part of the town. This should be reflected in the text under the Open Space heading.

The Council throughout the lifetime of the Plan will continue to access available funding to improve active travel measures, and public realm enhancements however this will be dependance on funding. Clare County Council would support any application by the community to obtain funding to undertake some of the aspects named in the submission such as public art, greening and visual enhancements around the village. I consider that there is adequate general objectives within the settlement statement to provide for any such future project that the community has highlighted.

The Development Plan process is not the appropriate forum for speed limit issues. Responsibly for the review of speed limits lies with Transport Infrastructure Ireland (TII) who undertake

periodic reviews. This review process is the appropriate forum for a submission should you not already have made one.

Placemaking and Regeneration

Reference to the current ORIS project will be included in the text however items such as tourism information boards etc. are operational issues and not a matter for the Development Plan.

Parking measures are continuously reviewed by the Area Office and it is a General Objective of the Settlement Plan to seek to provide street improvements and quality of public realm surfaces on completion of necessary works to water and sewerage infrastructure"

Reference to OS3 shall be updated to say largely in private ownership.

Chief Executive's Recommendation

Recreation
In addition to the range of existing recreational facilities in the town it is an objective:
-To explore the completion of the cycleway linking Ennis to Bunratty via Newmarket-on-Fergus
- To promote the EuroVelo cycling route that passing through the town and across the County

Employment and Enterprise
Newmarket-on-Fergus is located within a short commuter distance of the Key town of Ennis and the Metropolitan town of Shannon and Limerick city which, along with Shannon International Airport, are key drivers of the regional economy. Agriculture remains an important part of the local economy. The Obair Tradaree Food Hub in the centre of the town has developed as a production kitchen for Meals on Wheels, a training unit for the hospitality sector and an incubation unit for small business start-ups. In order to support economic development, the Council will support the development of food manufacturing and innovation and facilitate home based economic activity and encourage agri-tourism and farm enterprise in Newmarket-on-Fergus and the surrounding rural areas.

Open Space

Newmarket-on-Fergus is well provided for in terms of recreation space and informal open space which is accessible to the public. The open space around Lough Gash is largely in private ownership which is not accessible to the public. Preliminary design concepts for the Newmarket on Fergus (Lough Gash) Outdoor Recreational Infrastructure Scheme are currently being developed which may facilitate a level of access to the Lough, via the land around the treatment plant this in turn would develop a recreational route around part of the town.

It is an objective:

- To maximise the use of existing green spaces and amenity areas and encourage the further development of the existing riverside walk and public park, subject to the requirements of the Birds and Habitats Regulations in respect of Lough Gash SA and pNHA.

Submission No: S2/710 –Patrick & Laura MacMahon	
Relevant Chapters / Topics	• **Wind Energy Strategy** • **Renewable Energy** • **West Clare**

Summary of Issues Raised in Submission

- Need to consider the rezoning of lands for wind energy.
- The North Clare area in particular with the number of planning applications from turbine companies
- Also taking into account the number of turbines already in the area and proximity to residences.
- Need to look at alternatives such as sea energy.

Chief Executive's Response

I thank Patrick and Laura McMahon for the submission.

The Wind Energy Strategy is included as Volume 6 of the draft Development Plan and there is a commitment through the inclusion of a specific objective in both the draft Renewable Energy Strategy in Section 6.6 Policy Provision and in Volume 1, objective CDP 11.47 Renewable Energy of the draft Plan to prepare a new Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. The preparation of a new Wind Energy Strategy will involve a review of the exiting WES in developing future policy for the county.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/711 –Miltown Malbay Windfarm Opposition Group	
Relevant Chapters / Topics	• **Wind Energy Strategy** • **Renewable Energy** • **West Clare**

Summary of Issues Raised in Submission

- Need to consider the rezoning of lands for wind energy.
- The North Clare area in particular with the number of planning applications from turbine companies
- Also taking into account the number of turbines already in the area and proximity to residences.
- Need to look at alternatives such as sea energy.

Chief Executive's Response

I thank Miltown Malbay Windfarm Opposition Group for the submission.

The Wind Energy Strategy is included as Volume 6 of the draft Development Plan and there is a commitment through the inclusion of a specific objective in both the draft Renewable Energy Strategy in Section 6.6 Policy Provision and in Volume 1, objective CDP 11.47 Renewable Energy of the draft Plan to prepare a new Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. The preparation of a new Wind Energy Strategy will involve a review of the exiting WES in developing future policy for the county.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/719 –Bernadette Kiely	
Relevant Chapters / Topics	• **Ballycannon North** • **Kilrush** • **Kilkee** • **Wind Energy** • **Enterprise and Public Realm** • **Kilkee Wastewater Treatment Plant**

Summary of Issues Raised in Submission

The submission relates to a number of issues such as windfarm locations in the County in particular at Ballycannon, enterprise and public realm in Kilrush and wastewater in Kilkee.

Windfarm Locations

In the submission, consideration of moving the location of windfarms to the north of the county rather than the south, such as at Ballycannon, would be welcome, for the following reasons:

- The density of housing development and the Council's plans for the further development of Ballycannon should have a bearing on the location of future windfarm developments.
- 'metropolitan' area designation which implies that it is an urban hinterland likely to be developed more
- Proximity of the LNDR
- Agrees that wind energy is worth harnessing and notes that care and consideration of the long-term impacts are important too.

Enterprise and Public Realm

Hopes that the Council would promote and support new businesses in the area of the Place de Plouzane in Kilrush Town by advertising all supports available, notes the general exterior maintenance of buildings could be improved upon and supports the proposal to open a laneway from Henry Street as it would increase footfall in the 'Place'.

Kilkee Wastewater Treatment Plant

Welcomes the Kilkee water treatment plant and hopes that it will not generate an unwelcome level of noise in the vicinity.

Chief Executive's Response

I would like to thank Bernadette Kiely for the submission which relates to several areas in the County and I acknowledge the concerns raised.

Windfarm Locations

While I acknowledge the request to consider amending windfarm designations in the County unfortunately these issues cannot be addressed at this time. Department of Environment, Community and Local Government Circular PL 20 -13 indicates that until the national policy review

processes have concluded in relation to the Wind Energy Development Guidelines, local authorities should defer amending their existing development plan policies in relation to wind energy. Clare County Council has therefore included an objective in the Draft Clare County Development Plan 2023-2029 and will do so when the when the national policies and guidance are in place. Please refer to CDP11.47 Renewable Energy, in Chapter 11 of Volume 1, to prepare a new and updated Wind Energy Strategy for County Clare during the lifetime of this plan, subject to the publication of the update to the *Wind Energy Development Guidelines for Planning Authorities 2006.* I would note that considerations as outlined in the submission in relation to the siting of new windfarm developments, such as impact on adjacent residences and future plans, are dealt with as part of the development management process.

In relation to the comments on density of housing and the Council's plans for the further development of Ballycannon in permitting new wind energy developments, all issues raised in a submission made on a planning application for such development are taken into consideration by the Council, irrespective of whether they are from a minority or majority viewpoint. Clare County Council welcomes the engagement of all citizens in the planning process.

Enterprise and Public Realm

The Kilrush Settlement Plan contains policies and objectives to support new businesses and public realm enhancements including general objectives to ensure that Kilrush, as a Service Town, is a driver of growth and prosperity in both the town itself and the wider hinterland by strengthening the economy of the town, attracting new investment in employment, services, retail, and tourism uses and to support the Kilrush Town Team to deliver the Kilrush Masterplan within the lifetime of this plan. The Kilrush Masterplan is intended to be a framework for the future development of Kilrush and will consider the regeneration of the existing streetscape and consolidation of the town centre enhancing connectivity and walkability between the town centre and wider area including Cappa Village and Pier, and Kilrush Harbour and Marina. While these are wider objectives for the town, they will support enterprise and public realm improvement at Place de Plouzane. In addition, under 'Retail Development' reference is made to existing vacant retail units in the town, including at Place de Plouzane which fronts the free public carpark at the rear of Burton Street. In this regard, the area has been identified as an opportunity site, OP1, and it is considered the area would benefit from public realm enhancements as well as bringing the existing vacant units back into use.

I note the support for proposal to open a laneway from Henry Street.

Kilkee Wastewater Treatment Plant

I note the concerns in relation to potential noise at the Kilkee water treatment plant. Issues such as noise and other impacts on neighbouring residences in any development proposal, including wastewater infrastructure, is considered as part of the permission process.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/722 –Greg Larkin	
Relevant Chapters / Topics	• **Renewable Energy** • **Solar Energy**

Summary of Issues Raised in Submission

This submission relates to the development of solar farms on agricultural lands.

- Their environmental impact needs to be minimized to ensure a minimum of 500m distance between solar farms and houses.
- Their impact on landscape needs to be minimized by ensuring there is no interference with existing hedgerows and trees.
- Visual impact needs to be minimized by ensuring a minimum of 500m from adjoining housing and additional planting of trees to mitigate the impact.

Chief Executive's Response

I thank Greg Larkin for the submission.

Currently there are no national guidelines in place to guide the location or scale of solar farms. Whilst solar farms have limited external impacts beyond the site boundary, consideration will be given to any potential negative landscape impacts, protecting high value agricultural land suitable for tillage, and proximity to housing.

General safeguards for amenity and environmental protection are included in section 17 of the draft Renewable Energy Strategy with specific objectives in Volume 1 of the draft Plan including CDP3.1 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment and CDP11.47 Renewable Energy.

Chief Executive's Recommendation

I recommend there is no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/730 –Derrick Gleeson & Cathy Blake	
Relevant Chapters / Topics	• **Wind Energy** • **West Clare**

Summary of Issues Raised in Submission

This submission relates to wind energy development in West Clare.

- There is enough wind farm development.
- Need to look at new options such as offshore wind farms.
- The new 125m plus wind turbines are not suitable near rural households or towns.

Chief Executive's Response

I thank the authors of their submission.

I note the issues raised in relation to wind farm developments, particularly in West Clare

Off-shore wind energy is recognised as a significant renewable energy source which will become increasingly prevalent in the years to come. Upon the publication of the update to the Wind Energy Development Guidelines for Planning Authorities 2006 a new Wind Energy Strategy will be prepared which will address both off-shore and on-shore wind energy. Objective CDP 11.47 Renewable Energy part d) sets out a commitment in this regard.

Chief Executive's Recommendation

I recommend not amendment to the Draft Clare County Development Plan 20203-2029 on the basis of this submission.

Submission No: S2/732 –Andrew Clancy	
Relevant Chapters / Topics	• **West Clare Railway Greenway**

Summary of Issues Raised in Submission

This submission objects to the establishment of a green way especially as there has been no consultation with landowners. Other options need to be explored. Why was there no consultation in Miltown Malbay regarding the Plan?

Chief Executive's Response

I wish to thank Andrew Clancy for the submission and address the issues raised as follows:

The establishment of a West Clare Railway Greenway has been a long-standing objective of successive Clare County Development Plans.

In the draft County Development Plan, the greenway is given policy support in the Tourism chapter – Chapter 9 (under Policy Objective CDP9.8), in Chapter 10 'Sustainable Communities' (under Policy Objective CDP10.11) and in Chapter 11 'Physical Infrastructure, Environment and Energy' (under Policy Objective CDP11.5).

The Council's Capital Projects Section are managing the project to deliver the Kilrush-Kilkee section of the West Clare Railway Greenway at present. The project has proceeded through an initial stage of public consultation regarding Route Selection. This concluded in October 2021. A detailed appraisal of the options is being undertaken subsequent to the public consultation and the preferred route option will be identified in the forthcoming months.

In relation to the remaining sections of the West Clare Railway Greenway, it is anticipated that the Ennis-Ennistimon section will proceed to Route Selection stage in the near future. Other sections of the Greenway, such as that which concerns this submission, will proceed through public consultation stages subsequently. It is suggested that matters relating to the section in question should more appropriately be raised within those project consultations.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/734 –Andrew & Tracy Clancy	
Relevant Chapters / Topics	• **West Clare Railway Greenway**

Summary of Issues Raised in Submission

This submission relates to lands at Miltown Malbay and an OSI map (ref C15904201) is included with this submission.

- Landowner uses the bog road which runs from the church to Clonbony river is used to move livestock.
- If proposed greenway goes ahead it will divide the lands in two and will make this road more vital for access.

Chief Executive's Response

I wish to thank Andrew and Tracy Clancy for the submission and address the issues raised as follows:

It is noted that the West Clare Railway Greenway objective, as mapped in the draft CDP, follows the N67 north of Miltown Malbay before diverting 'cross-country' onto the alignment of the West Clare Railway. The roadway that is subject of the submission is located away from the mapped alignment.

The Council's Capital Projects Section are managing the project to deliver the Kilrush-Kilkee section of the West Clare Railway Greenway at present. The project has proceeded through an initial stage of public consultation regarding Route Selection. This concluded in October 2021. A detailed appraisal of the options is being undertaken subsequent to the public consultation and the preferred route option will be identified in the forthcoming months.

In relation to the remaining sections of the West Clare Railway Greenway, it is anticipated that the Ennis-Ennistimon section will proceed to Route Selection stage in the near future. Other sections of the Greenway, such as that which concerns this submission, will proceed through public consultation stages subsequently. It is suggested that matters regarding access to lands should more appropriately be raised within those project consultations.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/740 –Louise Kiernan	
Relevant Chapters / Topics	• **Renewable Energy**

Summary of Issues Raised in Submission

The mains points of this submission:

- Green field sites and agricultural land should not be primary location for solar panels.
- Roofs of industrial buildings and brown field sites should be primary focus.
- Should be guidelines on concentration levels of these farms ie a limit on amount of land that can be allocated.
- Limited planning regulations for solar panels and their proximity to dwellings, removal of trees.
- How will guidelines for biodiversity such as sheep grazing be enforced.

Chief Executive's Response

I thank Louise Kiernan for the submission.

Clare County Council supports the national framework for micro-generation and will actively promote the uptake of incentives, schemes and grants in relation to expanding the level of rooftop solar panels on both residential and commercial buildings.

Currently there are no national guidelines in place to guide the location or scale of solar farms. Whilst solar farms have limited external impacts beyond the site boundary, consideration will be given to any potential negative landscape impacts, negative impacts on biodiversity, and proximity to housing. General safeguards on amenity and environmental protection are included in Section 17 of the draft Renewable Energy Strategy as well as further policy support in this regard in Volume 1 of the draft Plan, specifically CDP3.1 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment and CDP 11.47 Renewable Energy.

Each of the draft Development Plan objectives and settlement plans follows the SEA, AA, and SFRA processes undertaken as part of the draft CDP. All national guidelines and regulations in terms of biodiversity and habitat protection which are required as a function of proper planning procedures will be followed as part of the development management process for any planning application.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2 - 742 – Rosemary Hannan
Relevant Chapters / Topics • **Doonass**
Summary of Issues Raised in Submission
The submission relates to the maintenance of the footbridge between Doonass and Castleconnell over the river Shannon is an important amenity for the communities on both sides of the river. • Village of Castleconnell provides services for Clonlara i.e. Post Office, Credit Union etc. • It is important that the footbridge is maintained to a safe standard.
Chief Executive's Response
I thank you for your submission and I wish to respond as follows, I concur that this is an amenity of significant value linking the communities of Castleconnell and Clonlara, however operational issues relating to maintenance of the bridge do not fall within the remit of this CDP.
Chief Executive's Recommendation
I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/743 –Clare Public Participation Network	
Relevant Chapters / Topics	• **Chapter 2 Climate Action** • **Chapter 8 Natural Resources - Fracking, Mining** • **Chapter 11 Energy – Natural Gas Infrastructure** • **Marine Protected Areas** • **Chapter 10 Sustainable communities - Retrofitting** • **Rights of Nature** • **Sustainable Development Goals**

Summary of Issues Raised in Submission

The submission includes general information on Clare PPN and the Clare Environmental Network (CEN) and provides a link to their Wellbeing Vision Statements for Clare. The following items are referenced in the submission:

Climate Change

Notes recent changes in the global and national contexts in relation to the climate crisis since drafting of the plan and welcomes the priority given in the Draft Plan to climate and climate action and the inclusion of an entire chapter on climate action.

Considers other objectives in the Draft Plan are contrary to the above and will either not be compatible with its Climate Action Plan, or its Climate Action Plan will not be compatible with the national long term climate action strategy. In particular the commitment to build a data centre near Ennis that includes what is effectively a large gas-burning power station and CDP Objective 11.46 which includes facilitating the "expansion of the Natural Gas infrastructure throughout the County". In this regard, the following is requested:

- that all commitments to build, promote or support data centres in Co Clare should be removed from the CDP 2023-2029;
- that the CDP 2023-2029 should stipulate that no new industrial developments that increase the burning of fossil fuels be permitted in Clare;
- that no developments should be allowed that will result in a significant in-crease in consumption of electricity/fossil fuels.
- the removal of CDP Objective 11.46;
- the inclusion in the CDP 2023-2029 of a commitment to ban all new investment in fossil fuels or in fossil fuel infrastructure.

Fracking

Notes Objective CDP 8.13 Unconventional Gas Exploration and Extraction and considers that this requirement does not go far enough and in light of the fact that UGEE (hydraulic fracturing or fracking) has been banned by law in the Republic of Ireland since 2017, requests that the Clare CDP 2023 should:

- be more explicit in stating that such activity should not be allowed in Clare under any circumstances;
- include a commitment that no gas produced via hydraulic fracturing shall be imported and no planning permission will be granted in Co Clare to any projects seeking to import such gas.

Marine Protected Areas:

In the submission it is requested that a reference to the current programme for government commitment to increasing Ireland's 'Marine Protected Areas' from 2.13 % of Ireland's total maritime area to 30% by2030 is included in the County Development Plan at every stage where offshore energy projects, seaweed harvesting, commercial fishing, sea and shore based tourism and any sea bed extractive projects are mooted.

In the submission it is also requested Clare County Council adopt and include the following definition of Marine Protected Areas as recommended by the Government's advisory group as follows:

'*A geographically defined area of marine character or influence which is protected through legal means for the purpose of conservation of specified species, habitats or ecosystems and their associated ecosystem services and cultural values and managed with the intention of achieving stated objectives over the long term.'*

Just Transition

Refers to the concept of Just Transition which was included in Ireland's Climate Law enacted in 2021, and notes a few references to it in the Draft Plan, the following is requested to be included in the Plan:

- A commitment to ensure a Just Transition for workers and communities across Clare;
- A commitment regarding Moneypoint power station to work with all re-sources available to Clare Co Council for a Just Transition for those who work there.

Notes that Clare residents are particularly affected by measures to reduce carbon emissions with car dependency more than 10% higher and dependency on oil fired central heating almost 20% higher than the national average. Considers carbon taxes and increasing prices for oil and gas may exacerbate inequalities and measures and plans to mitigate the effects of this including through retrofitting and provision of public transport are immediately necessary.

Mining

Refers to Objective CDP 8.14 Minerals, Mining and Quarrying and the significant negative impacts of mining for precious metals as well as a recent application for prospecting licence in the county on both Natura 2000 and pNHA designated sites. In this regard the following is requested:

- That Objective 8.14 is removed from the Plan;
- A commitment not to permit mining in Co Clare is included in the Plan.

Retrofitting

Welcomes the inclusion of supporting "energy efficiency" in Goal I of the Draft Plan however considers there is a disappointing lack of measures to support and facilitate retrofitting and refers

to RPO 160 Future proofing and Retrofitting in the Southern RSES. In this regard the following is requested:

- Measurable targets for retrofitting work on Clare County Council's own buildings.
- A commitment to seek any available funding to make retrofitting of houses accessible to those at lower income levels. Grant schemes currently available are only relevant if a person has sufficient wealth or access to credit to avail of them in the first place. CPPN/CEN considers that as part of the Local Authority's ambitions to boost employment, to cut carbon emissions and improve air quality that a fully subsidised Local Authority-led scheme for retrofitting of houses could be viable.

Rights of Nature

Refers to a 'Rights of Nature' (RoN) approach which proposes a way to rethink our relationship with nature which would help the Council be at the forefront of sustainable development, climate action and climate adaptation as well as shift from its current extractive approach to a custodianship approach. Notes that several local authorities have adopted pioneering motions recognising the Rights of Nature and in this regard, the following is recommended:

- That Clare County Council adopts a Rights of Nature approach and that this be enshrined in the Clare CDP 2023-2029.

The Sustainable Development Goals

Considers that these Goals are inextricably linked in achieving social inclusion aims and should be referenced and integrated throughout the Plan.

PPN Submission on Pre-draft Plan [Sub No. 64]

Considers that issues raised in this submission remain largely unaddressed in the Draft Plan and therefore re-submitted here for consideration as amendments to the draft Plan. The pre-draft submission, included as part of this submission, has been considered at pre-draft stage as part of the Chief Executive's Report. The Chief Executive's Report contains a summary of the issues raised, and a response and recommendation which has been considered by Elected Members and incorporated into the Draft Plan as agreed and considered appropriate (please refer to the Chief Executive's Report on the Pre-draft Plan for further details).

Chief Executive's Response

I would like to thank Clare Public Participation Network and the Clare Environmental Network (CEN) for this comprehensive submission, and I would like to respond as follows.

Climate Change

I welcome the positive comments in relation to the content of the Draft Plan relating to climate and climate action.

In relation to concerns raised in the submission, data centres have recently become a topic of national concern due to their energy consumption and strain on the national electricity operator, Eirgrid. Data centres are dependent on a number of infrastructural requirements for them to function which include uninterrupted power supplies, ventilation, cooling systems, and network connectivity. With data centres consuming significant amounts of energy to function, they have

been criticised for having a negative impact on the environment. Ireland currently has approximately 70 operational data centres. The centres are responsible for 1.58 per cent of Ireland's carbon emissions. Due to their reliance on the national electricity grid, the facilities are mostly powered by gas. There is one site identified in County Clare for the locating of a data centre which is at ENT3 just outside Ennis. The key source of emissions from these facilities arising from the necessary cooling system. From a climate perspective, the need for energy and cooling systems are not problems in their own right, it is the inefficiency of these systems and the underutilisation of the heat removed by the cooling system. I therefore consider that Objective CDP6.27 should be amended to ensure the inefficiencies in data centre energy and cooling systems are addressed in any proposal on the site.

In addition, I consider that Volume 3(a) section 2.14 should be amended to include for a Climate Impact Assessment which would ensure any applications for Data Centres within County Clare address the impact which these facilities can have on achieving our Climate Change targets in terms of emissions and energy demand.

Fracking

Objective CDP8.13 and Objective CDP8.14 in Chapter 8, Volume 1, of the Draft Plan are in line with EU policy and the Council is committed to applying the precautionary principle should any proposals come forward. Any such proposals would be subject to Objective CDP3.1 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment.

Marine Protected Areas

In relation to the request to include a reference to the current programme for government commitment to increasing Ireland's 'Marine Protected Areas' targets, until such time as the Marine Area Regulatory Authority is established and the Maritime Area Bill enacted, the Council has no remit over the maritime sector and no jurisdiction in this area.

In relation to the request to include a definition of Marine Protected Areas in the Draft Plan, I consider this is appropriate and should be included under Section 12.11 Environment in Chapter 12 of Volume1. In addition, the text of this section and the associated Objective CDP12.15 should include reference to the Shannon Estuary's status as a Marine Protected Area.

Just Transition

The parameters set out in the Draft Plan in relation to climate change which applies to all members of the community and wider public. It does not distinguish social division. However, I consider specific reference to Just Transition should be included in the Plan.

Mining

Clare County Council does not have remit over prospecting licences in the County, responsibility for this lies with the Department of the Environment, Climate and Communications. However, Clare County Council will ensure through their role as a Statutory Consultee in the process that the interests of the county in terms of environmental protection are to the forefront. Objective CDP 8.14 Minerals, Mining and Quarrying reflects this commitment.

Retrofitting

The Council supports the retrofitting of homes in the County, including Council own housing, however funding for retrofitting is provided by Sustainable Energy Authority of Ireland (SEAI). Objective CDP2.14 Transition to a Low Carbon Economy and Society expresses the Council's

commitment to climate/carbon proofing existing public buildings. K)To support investments in the energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'; and l) To report annually on energy usage in all public buildings and to achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP).

Rights of Nature

Clare County Council recognises this important statement of intention that imbeds this concept as a core value and as a keystone concept. I consider that this concept, the "Right to Nature" approach should be adopted through the review of the Clare Biodiversity Action Plan rather that the CDP. In this regard it is intended to review the Clare Biodiversity Action Plan in 2023.

The Sustainable Development Goals

Section 2.3.1, Chapter 2 of Volume 1, sets out the International Context for the county development plan which includes reference to the United Nations Sustainable Development Goals (SDG's) 2015. These goals have been considered and incorporated as appropriate in the preparation of the Draft Plan.

PPN Submission on Pre-draft Plan [Sub No. 64]

The current submission considers that issues raised at the initial submission stage on the pre-draft plan have not been addressed. I can confirm that the pre-draft submission was

considered at the pre-draft stage as part of the Chief Executive's Report, which contains a summary of the issues raised as well as the response and recommendations which were subsequently considered by Elected Members and incorporated into the Draft Plan as agreed and considered appropriate (please refer to the Chief Executive's Report on the Pre-draft Plan for further details).

Chief Executive's Recommendation

I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029:

Objective CDP6.27 in Section 6.28 Data Centres, Chapter 6, Volume 1 – amend objective to read:

CDP6.26

It is an objective of Clare County Council: To facilitate and support the development of a data centre on the Enterprise zoned lands (ENT 3) at Toureen Ennis subject to normal planning considerations and the implementation of the findings of the SEA and AA associated with this Plan. Any planning application for this site must include an analysis of the impacts from Green House Gas (GHG) Emissions associated with both the energy and cooling systems on the environment in the context of Climate Change and our commitment in CAP 2021 to achieve a reduction of 51% in GHG emissions by 2030.

Section 2.14 Technical Guidance – Transformational and Opportunity Sites, in Volume 3(a) – include additional paragraph to read:

Any planning application for a Data Centre within County Clare shall be accompanied by a Climate Impact Assessment to ensure that any impact that such a facility may have on the achievement of Climate Change targets, in terms of emissions and energy demand, is appropriately addressed.

Section 12.11 Environment, Chapter 12, Volume1 – include additional paragraph to read:

The Shannon Estuary is also a Marine Protected Area. A Marine Protected Area is a geographically defined area of marine character or influence which is protected through legal means for the purpose of conservation of specified species, habitats or ecosystems and their associated ecosystem services and cultural values and managed with the intention of achieving stated objectives over the long term.

Objective CDP12.15 Building on the Shannon Estuary as an Environmental Asset – amend point (e) to read:

e) To work in partnership with all relevant authorities to support the preparation of a site-specific conservation management plan for the Lower River Shannon cSAC taking into consideration ~~its status~~ the status of the Shannon Estuary as a Marine Protected Area

Under 'EU Green Deal (2020)' in Section 2.3.2 European Context, Chapter 2 of Volume 1 – include additional paragraph to read:

The Just Transition approach, which was included in Ireland's Climate Law enacted in 2021, emphasises a coordinated, long-term, and multi-pronged response involving social partners, industry, and Government. In the context of the implementation of climate change response measures in meeting emissions targets and adapting to the negative impacts of climate change, the just transition approach aims to ensure the creation of decent work, greener quality jobs, improving quality of life and better place making. It also aims to ensure that the opportunities associated with moving to a zero-carbon economy are maximised, while minimising negative environmental and socio-economic impacts. Finally in terms of equality, the just transition approach is based on fairness, equality and inclusion, and provides a mechanism by which nobody gets left behind.

Submission No: S2/744 –Clare Public Participation Network	
Relevant Chapters / Topics	• Sustainable Development Goals • Chapter 1 Socio Economic Rights and Anti- Poverty • Chapter 2 Climate Action • Chapter 5 Housing & Housing Strategy • Chapter 10 Sustainable Communities • Chapter 18 Design and Placemaking

Summary of Issues Raised in Submission

The submission includes general information on Clare PPN and provides a link to their pre-draft submission. The following items are discussed in the submission:

<u>The Sustainable Development Goals</u>

Considers that these Goals are inextricably linked in achieving social inclusion aims and should be referenced and integrated throughout the Plan.

<u>Clare PPN Wellbeing Vision Statement for County Clare</u>

Refers to consultative project to develop a Wellbeing Vision for County Clare and each of its municipal districts undertaken by Clare PPN in 2020 and requests that the key aspirations in these vision statements are considered when finalising the Draft Plan.

<u>Chapter 1 Socio Economic Rights and Anti- Poverty</u>

Request Section 1.5 under the heading 'A vision for County Clare' is amended to include a statement committing the Local Authority to 'A County that is committed to **reducing poverty and deprivation** within its population through all its actions and strategies and through proactive collaboration with other organisations in the county'

<u>Chapter 2 Climate Action</u>

Welcomes the inclusion of a chapter on climate action and considers the aspirations of the chapter are contradicted by other actions and proposals within the Draft CDP as follows:

1. A lack of consideration in the chapter regarding how actions impact the lives of marginalised communities and those facing exclusion and/or poverty, in particular the Draft Plan does not include measures around infrastructure and service provision, economic developments which will address issues such as current severe increases in energy costs, severe water pollution, farming, forestry and untreated sewage, poor air quality, access to medical services and hospitals.
2. Section *2.1 Strategic Aims* makes no reference to climate/carbon proofing existing buildings including local authority housing that need significant investment to bring to a suitable standard.
3. Recommends the inclusion of social inclusion representatives on the Adaptation Steering Committee outlined in *2.6.1 Local Adaptation and Business Operations.*
4. Recommends that the Smarter Travel document mentioned in *2.6.2 Infrastructure and the Built Environment* which is currently under review is applied to Clare in a way that promotes universal access to public transport.

5. Recommends that Clare County Council adopt a living wage policy and that all economic development, businesses and projects which are supported in any way by the Local Authority must have as a requirement that employees of all ages are paid the living wage in any given year.
6. Recommends the insertion of 2.10 Climate Justice which will commit to protecting marginalised communities by;
    - providing enough good quality affordable housing
    - facilitating the development of renewable energy to cushion energy price fluctuations and to employ local people in areas that have historic under/seasonal employment
    - ensuring that climate adaptation/mitigations actions do not further marginalise communities and prevent participation
    - removing financial barriers that prevent retrofitting homes that require it, especially in rural communities
    - targeting recruitment for renewable energy apprenticeships towards socio-economic communities with few employment opportunities.

<u>Chapter 5 Housing Strategy</u>

Considers that the draft plan in its written statement and housing strategy severely underestimates current and projected housing need in the County and considers that the housing strategy for this draft county development plan is not adequate to meet the projected housing needs in the county. While the constraints posed by national policy is recognized, the following actions are proposed:

1. Requests in advance of adoption of this County Development Plan that Clare County Council engage with national government and seek an increase in their housing supply targets of at least 1500 units to allow for growth, relocation, migration and addressing the housing needs of those on the housing waiting list.
2. Requests that the Council use this current County Development Plan to really take on dereliction in the county and to seek resources, funding, staff, and community support to develop an extensive programme under the Town Centre First Policy that brings 1000 dwellings back into use.
3. Requests that the Council it maintains a comprehensive vacant sites and vacant properties register. That all penalties and taxes relating to these are collected in a timely and proactive fashion.
4. Requests that the Council where necessary looks at purchasing derelict town centre properties, if necessary, by using its compulsory purchase powers when it is in the benefit of the wider community.
5. Requests that the Council collaborate with Training and Educational Institutes in the county to ensure that a skilled work force of tradespeople, retrofitters and builders are available in the County. Clare County Council currently only hosts 3 apprentices, and this figure could be greatly expanded.
6. The Council should work with approved housing bodies including CENA to develop high quality sustainable energy efficient homes for the population including all demographics.
7. Considers it a missed opportunity that the Housing Strategy consultants did not consult with the community. Also considers projections are unreflective of reality and should be corrected in advance of adoption of this plan e.g. house and rent price increases and that

basing estimates for income growth for the population of Clare on national GDP growth is an unsound basis for making any projections for affordability of future housing.

Section 5.2.10 Housing for People with Disabilities

Recommends that universal access to public transport is integral to the provision of housing as per *5.2.10 Housing for People with Disabilities to* ensure full participation in employment, healthcare and leisure activities as described in the UNCRPD (Article 19)

Section 5.2.4 Emergency Accommodation

Considers this section must acknowledge those experiencing homelessness who to have difficulty engaging with the Homeless Action Team for various reasons ad requests and recommends the following:

- Long-term sheltered housing for those who for whatever reason are unable to manage own-door accommodation.
- That any mother under the age of eighteen presenting to the Homeless Action Team be facilitated and taken care of with her child/children
- That the Homeless Action Team is trained on domestic violence and coercive control so that women and children are fully supported by service providers and not held accountable for the actions of an abusive partner
- A policy of emergency outreach and offer of accommodation to anyone on the streets or living in insecure dwellings including trailers should be instigated during red weather warnings.
- That the Council should undertake to provide emergency accommodation to all those presenting in need of it irrespective of their immigration or residency status in particular with respect to members of the Roma community.

Section 5.2.8 Traveller Accommodation & CDP5.10 Traveller Accommodation

Considers the current Traveller Accommodation Programme (TAP) 2019-2024 does not reflect actual community needs, refers to limitations in relation to vacancy rates in Traveller Specific Schemes and specific problems in Clare in relation to Traveller homelessness. Requests that a participatory Traveller Housing Needs Assessment is carried out and when reviewed the current TAP is amended and then reflected in the Plan.

Housing Assistance Payment (HAP)

Notes the Housing Assistance Payment (HAP) is the primary means by which local authorities provide social housing and refers to the implications of no national housing stock and privatization of the housing market. In this regard, the following is requested/recommended:

- Requests that any home approved for HAP be inspected for habitation, health and safety suitability
- Recommends that Clare County Council do everything in its power to progressively move away from subsidising the private rental market and invest in publicly owned housing stock instead including through the Town Centre Renewal Policy.

- Requests that single occupancy units be an integral part of any local authority housing scheme and that sufficient larger house sizes be provided to cater for the wide variety of family size in the County.
- Recommends that Clare County Council make long-term fixed tenancies for older people (that are not dependent on a private landlord) a priority

Chapter 10 – Sustainable Communities - Section 10.5 Diverse and Socially Inclusive Society

Refers to consultation with young people undertaken by Clare Youth Service in preparation for their submission on the forthcoming Government Policy Framework for Children and Young People in Ireland 2023-2028 and issues identified including ghettoization among young people, the need for community spaces to be available to them without prejudice, the lack of community space outside of sporting clubs, homelessness and rural transport as a barrier to accessing services and job opportunities. In this regard the following is recommended:

- Recommends consultation with the young people of Clare when planning recreational space for the community as a whole
- Recommends that Clare County Council leads the way in providing traineeships within the Local Authority aimed at early school leavers.
- Asks that the voice of young people experiencing homelessness is heard when finalising Volume Eight – Clare Housing Strategy.

Chapter 18 Design and Placemaking

Refers to Article 28 of the United Nations Convention in the Rights of Persons with Disabilities (UNCRPD) relating not only to housing and medical care but also community facilities that facilitate full participation of people with disabilities including changing places. The recent redevelopment of toilet facilities in Tim Smyth Park in Ennis is considered a missed opportunity. Recommends that Clare County Council makes a concerted effort to install a Changing Places facility in the largest urban area in each municipal district (Ennis, Shannon, Kilrush and Killaloe) as a minimum.

Chief Executive's Response

I would like to thank Clare Public Participation Network for the submission which highlights a number of concerns.

The Sustainable Development Goals

Section 2.3.1, Chapter 2 of Volume 1, sets out the International Context for the county development plan which includes reference to the United Nations Sustainable Development Goals (SDG's) 2015. These goals have been considered and incorporated as appropriate in the preparation of the Draft Plan.

Clare PPN Wellbeing Vision Statement for County Clare

I note work being carried out by Clare PPN including the development of a Wellbeing Vision for County Clare and its municipal districts which have been considered in the preparation of the Draft Plan.

Chapter 1 Socio Economic Rights and Anti- Poverty

I note the request, however I do not consider it is necessary to amend the vision as requested. As set out in Table 1 Five Strategic Development Plan Principles, I consider the term 'Inclusivity', which is included in the Vision, expresses the Council's commitment to reducing social exclusion, poverty and deprivation.

Chapter 2 Climate Action

1. The Draft Plan contains a myriad of policies and objectives to support and facilitate energy developments (Chapter 11), including renewable energy (Chapter 11 & Volume 5 Clare Renewable Energy Strategy & Volume 6 Clare Wind Energy Strategy), protection of our waters (Chapter 2, 2.8 Flood Risk Management & Chapter 11, 11.3 Water Resources), agriculture (Chapter 6, 6.20 Agricultural Development & Chapter 8), forestry (Chapter 8), wastewater treatment (Chapter 4, Chapter 11 & Appendix 1), air quality (Chapter 11, 11.6.2 Air Quality)and provision of medical facilities (Chapter 10, 10.20 Healthcare and Wellbeing & zoned lands in Settlement Plans, Volume 3).
2. CDP2.14 Transition to a Low Carbon Economy and Society expresses the Council's commitment to climate/carbon proofing existing public buildings k) To support investments in the energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'; and l) To report annually on energy usage in all public buildings and to achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP). Therefore, I do not consider it is necessary to include a Strategic Aim in this regard.
3. I note the request made in the submission, however, the inclusion of representatives on the Adaptation Steering Committee or any other is not a matter for the Draft Plan.
4. The request to promote universal access to public transport in terms of the updated Smarter Travel policy is noted.
5. It is not within the scope of the county development plan to adopt a living wage policy.
6. I note the points made in relation to Climate Justice. In this regard, the Draft Plan contains appropriate policies and objectives to support and facilitate the provision of affordable housing (Chapter 5 & Volume 8 Clare Housing Strategy), renewable energy (Chapter 11 & Volume 5 Clare Renewable Energy Strategy & Volume 6 Clare Wind Energy Strategy) and climate adaptation/mitigation measures (Chapter 2) and apprenticeships (Section 10.17.3 Third Level and Higher Education). The Council supports the retrofitting of homes in the County, including Council housing, however funding for retrofitting is provided by Sustainable Energy of Authority Ireland (SEAI).

Chapter 5 Housing Strategy

1. I acknowledge the concerns in relation to the housing supply targets for the County and the request that the Council engage with national government and seek an increase in these targets. With respect to projected housing needs, applicable figures in the Housing Strategy have been informed by two primary sources, the "Structural Housing Demand at County Level" figures as produced by the ESRI (published 14th December 2020), and the "Housing Supply Target Methodology for Development Planning" (published by the SHLG in December 2020). Consideration and application of these modelled figures has been advised through Ministerial direction (under Section 28 guidelines). The figures are aligned with national policy considerations under the National Planning Framework in this respect. With respect to how the aforementioned Housing Supply Target Methodology and Guidelines have been set out, there is no provision for the direct accounting of the existing social housing waiting list or households in receipt of HAP within the scope of the target figures. The Housing Strategy, in section 5.2 sets out the social housing waiting list figures (as of time of drafting), and further sets out in section 5.3 how Clare County Council is meeting this demand through a variety of different approaches and delivery streams.
2. The Council is committed to using all mechanisms available to it as appropriate and to work with Derelict Site owners to identify opportunities to bring derelict sites back in to use as confirmed in Objective CDP17.10, Chapter 17. Such mechanisms include the use of the Derelict Sites Act 1990 where appropriate to require owners to carry out suitable improvements, and to acquire properties which are appropriate to the Council's Capital Programme in order to carry out improvements to derelict sites and revitalise the surrounding areas. In this regard, Clare County Council's Derelict Sites Team have responsibility for dealing with derelict sites in County Clare including investigating all reports of dereliction and taking enforcement action in accordance with the Derelict Sites Act 1990. The Draft Plan promotes the Town Centre First Principles and includes Objective CDP17.1 to carry out public realm enhancement works as well as retail health checks, vacant site and derelict site surveys and other essential research and analysis to inform the actions required to support town and village centre renewal and development projects across County Clare.
3. Under the Urban Regeneration and Housing Act 2015 local authorities are required to produce a Vacant Sites Register, since 1 January 2017. This is a register of lands in the Council's administrative area that are suitable for housing but have not been put forward for development. Sites included on the register are subject to the Vacant Sites Levy.
4. Please refer to my response to point 2 above.
5. The further development of higher and further education including the development of additional apprenticeships is encouraged and supported by the Council. The Draft Plan contains policies and objectives in this regard including Section 10.17.3 Third Level and Higher Education and its associated Objective CDP10.17, including to support investment in Higher Education Institutes, Education and Training Board, apprenticeships, and skills development in the County as an enabler of jobs growth.
6. The Council is committed to working with approved housing bodies in the delivery of housing in the County. A Strategic Aim outlined in Chapter 5 Housing is to actively participate in the housing sector through the provision of public services, infrastructure and services for social, voluntary [including approved housing bodies] and private housing, and to implement the Clare County Housing Strategy 2023-2029 [set out in Volume 8 of the Draft Plan]. As noted in the Housing Strategy, as part of the Government's Housing For

All policy, Local Authorities will play a key role (in partnership with Approved Housing Bodies) in delivering new social and affordable homes.

7. Inputs considered by the Housing Strategy in relation to macro-economic influences on income change, house price change and rental price change reflect a consensus of industry reckonable forecasts taken from a variety of sources at time of drafting. Sections 4.24, 4.2.5 and 4.2.6 each set out from where these sources have been drawn. A conservative outlook has been applied in their application over the plan period. The basis upon which the housing strategy models for affordability does consider this scenario-based view.

   It should be noted that at time of drafting, the assumptions considered were much more reflective of market and global factors at that time. However, it is recognised that there have been exceptional global influences on macro-economic considerations, as well as significant inflationary changes in domestic price dynamics for property. Clare County Council will seek to prepare updated perspectives and incorporate within the Housing Strategy as appropriate.

   The quantum of housing needs is otherwise derived from projections developed by the ESRI who have similarly concluded a likely scenario. Variability from a scenario-trajectory is naturally likely and therefore, both the housing supply targets and concluded affordability, social and specialist needs should be considered as 'broad estimates' – as per the National Planning Framework guidance in relation to the HNDA.

Section 5.2.10 Housing for People with Disabilities

In relation to universal access to public transport, 10.6 Universal Accessibility, Chapter 10, includes Objective CDP10.5 b) In conjunction with representative organisations to promote disability awareness and improve equal access for all through universal design for public transport access, housing, social, cultural and recreational facilities and the public realm so as to improve quality of life equally for all.

Section 5.2.4 Emergency Accommodation

The Draft Plan contains policies and objectives in relation to homelessness and the accommodation provision including Section 5.2.4 Emergency Accommodation and its associated Objective CDP5.6 To support the work of the Clare Homeless Action Team and ensure that assistance is provided to those who are homeless or who are at risk of homelessness in the County. This would include measures outlined in the submission.

Section 5.2.8 Traveller Accommodation & CDP5.10 Traveller Accommodation

Under the Housing (Traveller Accommodation) Act, 1998 Clare County Council must prepare and have adopted a programme of Traveller accommodation in their area. The Council is required under the Act, to provide for the carrying out of a housing needs assessment in respect of Travellers resident in the county and to provide for an extensive public notification and consultation process as part of the preparation of their Traveller Accommodation Programme.

Housing Assistance Payment (HAP)

The Draft Plan contains policies and objectives to support the delivery of appropriate housing in the County, in particular Chapter 5 and Clare County Housing Strategy 2023-2029, Volume 8 of the Draft Plan. The Housing Strategy outlines the existing and future housing requirements of

County Clare and to set out measures for the Council to plan for and address these needs. In relation to the specific measures requested/recommended in the submission, this is an operational matter for the Housing Section of Clare County Council and is not within the scope of the Draft Plan.

Chapter 10 – Sustainable Communities - Section 10.5 Diverse and Socially Inclusive Society

I note the points made in the submission in relation to the needs of young people in County Clare and the need to ensure their voices are heard and their needs are met in the delivery of public facilities including recreational spaces. In relation to traineeships, as noted under 'Chapter 5 Housing Strategy' the further development of higher and further education is encouraged and supported by the Council which would include traineeships. In relation to consultation on the Housing Strategy, as noted previously, this has been prepared as part of the County Development Plan process and public consultation has been carried out in accordance with the requirements of the Planning and Development Act 2000, as amended. In addition, a series of public consultation events have been held throughout the County. There will be a further opportunity to comment on the plan at the next stage in the plan making process.

Chapter 18 Design and Placemaking

While I acknowledge the need for Changing Places facilities, particularly the larger urban centres such as Ennis, Shannon, Kilrush and Killaloe, I am satisfied that this is addressed in Objective CDP 10.1(b) To work in collaboration with all relevant stakeholders to facilitate the planning and delivery of accessible community facilities throughout the County.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/745 –Keep Ireland Open	
Relevant Chapters / Topics	• **Index and Layout** • **Introduction & Vision** • **Rural Development and Natural Resources** • **Tourism** • **Sustainable Communities** • **Physical Infrastructure, Environment and Energy** • **Marine and Coastal Zone Management** • **Landscape** • **Biodiversity, Natural Heritage and Green Infrastructure** • **Architectural, Archaeological and Cultural Heritage** • **Public Rights of Ways**

Summary of Issues Raised in Submission

In the submission concerns are noted in relation to many of the excellent provisions in the 2017 Plan not being carried forward to the Draft as follows:

General

Submits that an Index as recommended in the Development Plan Guidelines (5.15) is provided and considers layout could be improved by sub-numbering of sub-lettering lists of points and paragraphs.

Chapter 1 Introduction

Proposes several text additions in relation to legislative requirements for the plan including regard to plans in adjoining counties and co-ordinating objectives, conforming to RSES, securing finances to implement plan, consistent with NTA Strategy etc.

Chapter 8 Rural Development and Natural Resources

1. Proposes additional objectives to be included in Objective CDP8.2 Rural Innovation, Enterprise and Employment to address the impacts of new buildings/industrial business enterprises on neighbouring land uses.
2. Proposes additional points to be included in Objective CDP8.4 Agriculture in relation to commonage, recognize farmers as custodians, protect and conserve rural amenities from adverse impacts of agricultural practices.
3. Additional points to be included in Objective CDP8.8 Forestry in relation to commercial forestry, amenity woodlands, provisions dealing with both. Examples of appropriate objectives are given from other counties.

4. Additional points to be included in Objective CDP8.12 Renewable Energy Development as follows:

    a) Ensure developments are appropriately/suitably located and adopt a positive approach to renewable developments including any ancillary facilities or buildings.

    b) In assessing development proposals, take cognisance of public access to the countryside, impact on landscape, public rights of way and walking routes, protected or designated areas, NHAs, SPAs, national monuments etc.

    c) Support the development of a Regional Renewable Energy Strategy with stakeholders.

    d) Prepare maps showing the degree of acceptability from prohibition to preferred including areas in adjoining counties considered unsuitable. In addition, undertake analysis and prepare a map showing the Landscape Suitability for Wind Energy Development as per wind energy guidance.

    e) Identify existing public rights of way and established walking routes and maintain and preserve them free from development, restrict large scale wind energy structures in the rural hinterland and mountain areas to protect visual and environmental values, and ensure that the assessment of wind energy development proposals will have regard to the impacts on public rights of way and walking routes.

    f) The assessment of wind energy proposals consider landscape sensitivity, adjoining landscapes, scale, size and layout of project, cumulative effects, protected views and prospects, designated scenic landscapes, local visual impacts, conservation and archaeology and the visual and environmental impacts of access roads and plant and grid connections.

    g) In assessing planning applications have regard to existing and future international, European, national and regional policy directives and legislation.

    h) In terms of Hydro Power, consider impact on negative impacts on public rights of way and walking routes, surrounding environment, landscape and local amenities, protected species, nature conservation areas including SACs, SPAs & NHAs.

    i) In terms of Solar Power, propose Council make representations to the appropriate government department to make Planning Guidelines for ground mounted solar farms and promote the development of a Regional Renewable Energy Strategy.

5. Include an objective to prepare Wind Energy maps showing the degree of acceptability from prohibition to areas in adjoining counties considered unsuitable.

6. Additional points to be included in Objective CDP8.14 Minerals, Mining and Quarrying in relation to the identification of public rights of way as part of new extraction developments and consideration of impacts on rights of way. Examples of appropriate objectives are given from other counties.

7. Proposes an additional sub-section Electricity Transmission (including telephone & TV cables & Gas Infrastructure) and additional objectives to be included in relation to Electricity Transmission including telephone, television cable and gas infrastructure. Examples of appropriate objectives are given from other counties.

Chapter 9 Tourism

Additional objectives to be included in relation to protecting the landscape and safeguarding natural and cultural assets from unsuitable tourism developments. Examples of appropriate objectives are given from other counties.

Chapter 10 Sustainable Communities

Proposes additional text in relation to public rights of way and additional points to be included under Objective CDP10.13 Public Rights of Way. Examples of appropriate objectives are given from other counties.

Proposes additional objectives in relation to recreation and sports development including the recreational use of coastline and rivers, the development of blueways, the impact of golfing, noise generating proposals and nature conservation. Examples of such objectives from other counties are provided.

Chapter 11 Physical Infrastructure, Environment and Energy

1. Proposes that a table with maps of way-marked ways should be included as well as additional objectives promoting safe walking trails, long distance walking trails, mapping existing network of traditional paths, community routes etc. Examples of appropriate objectives are given from other counties.
2. Requests that the Council lobby the appropriate Government Department to agree and implement a scheme to indemnify private landowners with regard to recreational users on their land.
3. Proposes that a table of cycle routes with maps is included as well as additional objectives in relation to the provision of cycle routes/lands, long distance routes. Examples of appropriate objective are given from other counties.
4. Proposes additional objectives in relation to walking and cycling including support and progression of medium/long distance walk and cycleway, greenways, developing a Walking and Cycle Policy/Strategy, provision of carparking/laybys for walkers/cyclists, use of off road routes such as disused rail lines/bridle paths, mapping of existing network of traditional paths etc.
5. Proposes the replacement of the title of CDP11.20 'Public Rights of Way' with 'Preserve public rights of way'.
6. Proposes additional objectives under CDP11.55 Telecommunications Infrastructure to require the identification of Public Rights of Way and assess impact on established walking routes prior to any new telecommunications development.

Chapter 13 Marine and Coastal Zone Management

Proposes additional objectives for development of a strategic coastal path, access to the coast, beaches etc. to be included in this section and examples of appropriate objectives are given from other counties.

Chapter 14 Landscape

Considers objectives, in addition to the provisions for different Landscape Character Areas, need to be included to protect the landscape, particularly from inappropriate fencing, similar to the

approach adopted by other counties. Examples of appropriate objectives are given from other counties.

Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure

1. Proposes additional objectives to be included in relation to European Sites, NHAs & pNHAs, Ramsar Sites, other sites, Geological sites. Burren National Park, wildlife sanctuaries & nature reserves and Natural Heritage and Infrastructure schemes.
2. Proposes additional objectives to be included under Inland Waterways and River Corridors CDP15.16. as well as a table of existing or potential riverside walks/cycle routes.
3. Proposes additional objectives to be included relating to peatland, wetlands, feasibility study on areas worthy of world heritage site status.
4. Proposes additional objectives to Include a list with maps of heritage sites open to the public and a strategy for access to heritage sites.

Chapter 16 Architectural, Archaeological and Cultural Heritage

Proposes additional objectives to be included relating to importance of archaeology and National Monuments, signage, access, management of council owned monuments, impacts of development proposals, management and enhancement of archaeology. Examples of appropriate objectives are given from other counties.

Appendix 6 Public Rights of Ways

Notes no change to the list of public rights of way which includes only two routes which is not in keeping with the concept of providing legal and permanent access to the many walking routes particularly in the Burren. Requests that a provision that within two years of the adoption of the Plan that an advertisement be placed in all newspapers circulating in the area seeking suggestions from the public on walking routes which they would like to be listed. In this connection the format set out in Sec 10.15 4th para could be followed. Following which the Council should examine each proposed route to see if they should be added to the list.

Overview

Considers that the current plan fails to comply with, have regard to or take into account of Planning Legislation, national and regional plans and policies.

Chief Executive's Response

I wish to thank Keep Ireland Open for the submission to the Draft Plan and I acknowledge the importance of the concerns raised.

General

The contents of the submission are noted, the final formatting of the Plan will be completed at the end of the Plan making process. However, some of the points raised here are not appropriate to the layout of the plan.

Chapter 1 Introduction

The preparation of the Draft Plan, extensive consultation has taken place with and will continue throughout the process with adjoining Local Authorities, Southern Regional Assembly, OPR, OPW, NTA, NRA and other key stakeholders.

Chapter 8 Rural Development and Natural Resources

1. The impacts of any new buildings/industrial business enterprises on neighbouring land uses are more appropriately dealt with on a case-by-case basis through the development management process.
2. I am satisfied that the policies and objectives contained in Chapter 8 of the Draft Plan appropriately address Agriculture in the County.
3. I am satisfied that the policies and objectives contained in the Draft Plan, in particular in Section 8.3.2 Forestry and its associated Objective CDP8.10, Section 8.3.3 Bio-Energy and its associated Objective CDP8.11, 9.2.11 Rural Tourism and Forestry Tourism and its associated Objective CDP9.10 appropriately address commercial forestry and amenity woodlands in the County.
4. I acknowledge the points made in the submission in relation to Renewable Energy Development and respond as follows:
    a) Clare County Council note that developments must be suitably located, economical and sustainable. In addition, ancillary buildings associated with renewable energy development will be subject to standard requirements as guided by the planning permission process. The planning permission will take a holistic view of the proposed development, including the provision of public rights of ways, the visual impact upon other amenities, landscape impact, size and scale etc.
    b) It is not within the remit of the RES or draft CDP to comment on individual planning applications.
    c) Under Action 102 of the Climate Action Plan 2021, a review and revision of the Methodology for Local Authority Renewable Energy Strategies (LARES) will be carried out and will aid in providing comprehensive pre-planning guidance to developers. This process is underway.
    d) The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level mapping at County level. It does not purport to be as accurate or detailed as the research expected for a specific project, and therefore further comment on the specific merits/characteristics of an individual site - for example in relation proximity to housing, or in relation to ecological sensitivity - is beyond the scope of the Draft RES.
    e) Locational considerations such as proximity to, or within designated areas such as NHA, SPA and SAC, proximity to suitable demand centres, energy, and transport infrastructure, and competing economic and social interests, including public rights of way and walking infrastructure, present challenges which will need to be navigated through the planning system to achieve the targets set out.
    f) General safeguards on amenity and environmental protection are included in Section 17 of the draft RES.

g) The Council is required to have regard to existing international, European, national and regional policy directives and legislation in assessing planning applications.

h) Locational considerations such as proximity to, or within designated areas such as NHA, SPA and SAC, proximity to suitable demand centres, energy, and transport infrastructure, and competing economic and social interests, including public rights of way and walking infrastructure, present challenges which will need to be navigated through the planning system to achieve the targets set out.

i) It is recognised that currently there are no national guidelines in place to guide the planning of utility scale solar farms. This is an issue for national government to rectify in order to guide the development of solar farms at local level. Whilst solar farms have limited external impacts beyond the site boundary, consideration will be given to any potential negative landscape impacts, protecting high value agricultural land suitable for tillage, and proximity to housing.

5. In relation to the request prepare Wind Energy maps, it is essential that any county-level strategy, including the county development plan, is in line with higher national and regional strategies to ensure that conflicts between the strategies do not arise. An updated wind energy strategy will be prepared when the new national-level guidelines are available to the Council. In the interim, local authorities are obliged by Department of Environment, Community and Local Government Circular PL20-13, to delay the reviewing of their Wind Energy Strategies, which includes the Clare Wind Energy Strategy contained in Volume 6 of the Draft Plan.
6. I am satisfied that the policies and objectives contained in the Draft Plan appropriately address impacts of extraction developments in the County including Section 8.3.6 Extractive Industry, Chapter 8, Volume 1 of the Draft Plan which support the industry while having regard to protecting residential amenity and the receiving environment which could include public rights of way.
7. I am satisfied that the policies and objectives contained in the Draft Plan appropriately address Electricity Transmission (including telephone & TV cables & Gas Infrastructure) in the County including Section 11.8.5 Renewable Energy Sources.

<u>Chapter 9 Tourism</u>

I am satisfied that the policies and objectives contained throughout the Draft Plan, in particular Chapter 9 Tourism, appropriately address Tourism in the County.

<u>Chapter 10 Sustainable Communities</u>

I am satisfied that the policies and objectives included in the Draft Plan, in particular Section 10.15 and its associated objective CDP10.13, appropriately address public rights of way in the County. I would note that a public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan.

I am satisfied that the policies and objectives included in the Draft Plan, in particular Section 10.15 and its associated objective CDP10.13, facilitate appropriate recreation and sporting uses in the County as well as safeguarding our natural heritage and the environment.

Chapter 11 Physical Infrastructure, Environment and Energy

1. A list of way-marked ways is available from other sources, such as the Ireland walking guide website. It is not necessary to replicate them in the Plan. I am satisfied that the policies and objectives contained in the Draft Plan appropriately promote safe walking routes including Section 10.14 Countryside Recreation and its associated Objective CDP10.12 to promote and support access to rural areas including upland areas, forestry, coastal areas and the development of existing walking routes, pilgrim paths, mountain trails and nature trails in conjunction with other public bodies, representative agencies and community groups.
2. It is not within the scope of the county development plan to lobby Government, however the Draft Plan contains policies and objectives to work with landowners in relation to a variety of recreational sites, for example Objective CDP 9.24 to support and promote, with the co-operation of private landowners, public access and interpretive signage at heritage sites and features where appropriate. Objective CDP 15.7 to work with local communities, landowners, the National Parks and Wildlife Service and other relevant parties to protect, manage where appropriate, enhance and promote sites of ecological importance across the County in accordance with Development Plan Objectives CDP15.3 and CDP15.4.
3. A list of cycle routes is available from other sources, such as Cycling Ireland website. It is not necessary to replicate them in the Plan. I am satisfied that the policies and objectives contained in the Draft Plan promote the development of new cycle routes including Objective CDP9.8 Activity and Adventure Tourism, to sustainably develop greenways, blueways and peatways and walking and cycling trails including the West Clare Railway Greenway to achieve greater accessibility to the countryside and the marine environment by sustainable modes and to achieve maximum benefit and connectivity at the local, regional and national levels.
4. Please refer to my response to item no. 3 above.
5. I am satisfied that the title of CDP11.20 'Public Rights of Way' is appropriate.
6. I would note that a public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan. In addition, I am satisfied that the policies and objectives included in the Draft Plan, in particular Section 10.15 and its associated objective CDP10.13, appropriately address public rights of way in the County. In addition, the impacts of any new telecommunications development is more appropriately dealt with on a case-by-case basis through the development management process.

Chapter 13 Marine and Coastal Zone Management

I am satisfied that the policies and objectives contained in the Draft Plan address coastal paths and access to coastal areas, for example Objective CDP9.25, Chapter 9, to work with all relevant stakeholders to further develop and enhance the opportunity for tourism products in particular coastal and cliff walks in the Kilkee and Loop Head areas, cycling and niche tourism and Section 10.14 Countryside Recreation and its associated Objective CDP10.12 To promote and support

access to rural areas including upland areas, forestry, coastal areas and the development of existing walking routes, pilgrim paths, mountain trails and nature trails in conjunction with other public bodies, representative agencies and community groups.

Chapter 14 Landscape

While I acknowledge the points made in the submission, I am satisfied that the Draft Plan contains appropriate polices and objectives to protect, maintain and enhance landscapes in the county. Objective CDP14.1 expresses the Council's commitment to review and update the *County Clare Landscape Strategy* as soon as is practicable following the publication of the National Landscape Character Assessment and taking any associated guidelines. The county development plan will be updated to appropriately reflect any amendments/updates at an appropriate time. In relation to fencing of lands, I consider this can be appropriately dealt with through the development management process.

Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure

1. I am satisfied that the policies and objectives contained throughout the Draft Plan, in particular 15.2.2 European Sites and it associated Objective CDP15.3, County Geological Sites, Objective CDP15.7 Burren National Park, Wildlife Sanctuaries and Nature Reserves, appropriately address these sites.
2. I am satisfied that the policies and objectives contained throughout the Draft Plan including Objective CDP15.16 Inland Waterways and River Corridors, Section 9.2.14 Lakeland and Waterway Tourism and its associated Objective CDP9.13, Section 9.2.9 Activity and Adventure Tourism and its associate objective CDP9.8, Objective CDP10.12 Countryside Recreation, adequately address the protection and enhancement of these areas.
3. I am satisfied that the policies and objectives contained throughout the Draft Plan including, Section 15.2.16 Peatlands which recognises the importance of peatlands as major natural, archaeological and non-renewable resources, and its associated Objective CDP15.18 to protect and enhance the valuable peatland resource in County Clare including protecting the heritage and environmental value of these peatland areas, appropriately address the protection and enhancement of peatlands in the county. In relation to world heritage status for peatlands, Section 15.2.21 UNESCO World Heritage Site in Chapter 15 and its associated Objective CDP15.26 express the Council's commitment to collaborate with landowners, local communities and other relevant stakeholders to achieve World Heritage Site status for identified sites in County Clare. This could include peatlands.
4. I am satisfied that the policies and objectives contained throughout the Draft Plan, including Objective CDP9.24 Tourism in North Clare and The Burren f) To support and promote, with the co-operation of private landowners, public access and interpretive signage at heritage sites and features where appropriate, addresses heritage sites appropriately. In addition, a list of publicly accessible sites is available from other sources, such as the local authority website and the OPW website. It is not necessary to replicate them in the Plan.

Chapter 16 Architectural, Archaeological and Cultural Heritage

I am satisfied that the policies and objectives contained throughout the Draft Plan, in particular in Chapter 16, appropriately address Archaeological and Cultural Heritage in the County.

Appendix 6 Public Rights of Ways

I would note that a public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan. In addition, I am satisfied that the policies and objectives included in the Draft Plan, in particular Section 10.15 and its associated objective CDP10.13, appropriately address public rights of way in the County.

Overview

The preparation of the Draft Plan, extensive consultation has taken place with and will continue throughout the process with adjoining Local Authorities, Southern Regional Assembly, OPR, OPW, NTA, NRA and other key stakeholders.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2 - 746 – Clare Green Party	
Relevant Chapters / Topics	• Climate Change • Renewable Energy • Biodiversity • Transport

Summary of Issues Raised in Submission

This submission welcomes the commitment to climate control measures in Goal I of the Draft Plan.

- Supports the objective to meet the aims of Climate Action Plan 2021 and commitment to renewable energy;
- Would encourage thar all targets are realistic, can be readily monitored and that measures to attain them are identified;

Travel and Mobility

- Very few specific projects/targets are identified in Vols 1, 3, 5 and 10 contrary to the Guidelines.
- In general would propose to specify a modal shift in transport (Strategic Environ Objective CC1 & CC2).
- Specify target for reduction in number of two car households.
- Commit to provide clear guidelines on how to effect behavioral change to meet objective CDP 2.1 (c) eg awareness campaigns in schools, public notices, information nights etc.

Within urban areas (giving specific routes/locations)

- Specify target length of unbroken pathway / cycleway between all places of interest (schools, town centre etc.)
- Specify number of permeability access points to be created between existing housing areas and other developments/shopping areas/schools/places of interest.
- Provide safe pedestrian crossing and/or traffic lights at all roundabouts.
- Assign priority for pedestrians at all exits from housing developments, public buildings and retail areas
- Specify maximum distance between safe crossing points on major roads/streets.
- Give priority at traffic lights to pedestrians, with maximum of 30 seconds wait time
- Reduce speed limit in built up and residential areas to 30 km/hour.
- Provide electric vehicle charging facilities in all car parks, public buildings and recreational areas.
- Specify number and indicative locations of short term car rental park places.

Ennis

- Make proposed shuttle bus free and frequent and establish a target usage level.
- Specify number / location of park and stride infrastructure.
- The medieval structure is well designed for pedestrian access and the centre already has many key features of a 10 minute town. Focus active travel improvements on access to the town centre and on cross connectivity between suburban areas.

Rural Areas

- Ensure West Clare Railway Greenway also provides links to residential areas to maximise use for commuting as well as leisure (Obj3(a)13)
- Identify quiet routes between places of interest using back roads as Active Travel Routes. Develop these as routes for cycling/walking with speed limits, resident only access etc.
- In the west of county, combine Active Travel Routes with the WCR Greenway to provide a number of loops and interconnections and create a comprehensive network for commuting and leisure (e.g. Miltown to Ennis, Kilrush to Ennis, Lissycasey to Inagh)
- Develop and promote rural public transport / local link and establish mix of alternatives such as shared taxi/car share/short duration car hire.
- Implement measures to increase usage of local link buses and establish a target usage level.

Public realm including community/culture education and recreation/biodiversity (supporting the aims of Goal X and related goals)

- Specify target number of projects /successful outcomes for green infrastructure projects (CDP 15.30), including increased play areas, green areas etc.
- Provide funding to local resident groups for rewilding in housing developments
- Ensure continuous safe pedestrian/cycling access from residential areas to main recreational areas such as Ballybeg Woods and Lees Road. In particular, prioritise pedestrian/cycling access from Gort Road which is extremely dangerous at Droichead na Gabhar
- Utilise Rocky Road more fully as a public amenity and pedestrian/cycling route
- Ensure that all pedestrian/cycling routes are as pleasant as possible to maximise use.
- Provide meeting places for community groups, with indicative target number and locations
- Assign locations in specified urban areas for allotments and/or community gardens, potentially following the successful model in Shannon
- Continue to build on the Ennis win in Tidy Towns in biodiversity and cease use of herbicides and insecticides by the County Council within the period of the Plan
- Eliminate the use of Round-Up/glyphosate within the Burren National Park (CDP 15.23)

<u>Housing (Support the aims of Goals VI, XVI, XVII)</u>

- Welcomes the move towards compact growth of towns and propose following targets:
  - Specify number of unused commercial spaces and derelict buildings in town centre to be brought back into use
  - Specify number of thermal upgrades of public authority homes
  - Establish target for repurposing pockets of open space within existing residential areas (area or number) (CDP5.16)

Ennis Municipal Area / Ennis 2040

Volume 3(a) refers to transformational sites (TS) identified in the Ennis 2040 plan.

- <u>TS9, proposed data centre</u>. Volume 3(a) section 2.14 specifies elements that any development proposal must include. There is no reference to a climate impact assessment which should be included.
- The proposed development has an energy requirement of 200MW (80MW from the grid

in phase 1 and gas generation of 120MW in phase 2). This is not consistent with Ennis becoming Ireland's first climate adaptive town (Goal V3(a) 14). For the data centre to proceed in a climate neutral way, it should be required to provide additional renewable energy to meet its demand.

- TS6 – proposed wetlands and enterprise centre. Welcomes the proposed access to the extensive wetlands, and it provides great opportunities for active travel connectivity between the north and south of the town, while mitigating flood risk to the town.
- Have some concerns that the proposed enterprise/warehousing area could encroach on the natural amenity and wetlands area and could also interfere with the exceptional view of Clare Abbey on the entrance to Ennis. We also note that the proposed enterprise development potentially contradicts Vol 10(b)II goal CC4 – "No loss of wetlands, bogs, fens, marshes, or other carbon sinks across the county through reclamation, infilling or development."
- Consequently suggests that an existing brownfield sites is preferable for the proposed enterprise/warehouse centre.
- TS 3 - the post office field. The development of this field as a nature facility would be an asset to residents and visitors to Ennis. It is an exceptional natural area to have in a town centre and are concerned that increased access could result in degradation. Ask that the Council take every measure possible to maintain the field as it is, with only boardwalks in the main area as proposed, and to protect the wildlife from dogs and visitors.
- Proposed transformational project. Propose an additional transformational project to develop a centre of excellence for renewable energy and/or housing upgrades. This would provide skilled employment while also contributing to the county and national goal of reduced greenhouse gas emissions.
- Clare Renewable Energy Strategy. Noted in volume 5 that for the target of 550MW for onshore wind energy by 2022, only 153 MW was installed. The target for 2030 is 550MW. We suggest that the reasons that the previous target was not met should be examined and justification given that the current target is feasible. We note with concern that the proposed data centre would result in an additional demand of 200MW.
- Air quality. Volume 10b(ii)/Section 3.4 on air quality refers to the air quality as "good", with the air quality in Ennis being amongst the worst of urban towns in Ireland. The Plan should acknowledge the elevated levels in Ennis. The Plan should aim to identify the source of the elevated emissions and take appropriate action and help raise awareness. Accelerating the thermal upgrade of housing will result in an associated reduction in pollutant emissions and to provide information on air pollution due to traffic, it is recommended that a traffic monitor be installed at a suitable location, such as the Mill Road.
- Light Pollution. Include reference to the impact of light pollution on human health and nature and take actions to reduce it. The retrofitting of light emitting diode (LED) lighting has brought the necessary advantage of being more energy efficient. However, it has increased levels of light pollution due to its high levels of blue rich light or high colour correlated temperatures (CCT). CDP policy should restrict the installation of LEDs in residential areas, streets and public spaces to warmer colour LED luminaries (≤ 3000K CCT) to minimise adverse impacts. The council should also consider having regard to the Guidance Note GN01/21 the Reduction of Obtrusive Light – Institute of Light Professionals (2021). All new public lighting schemes should incorporate 'trimming and dimming' controls. The Council should consider the introduction of a Dark Sky policy for rural areas

of the county.

Chief Executive's Response

I wish to thank the Clare Green Party for the submission and wish to address the issues raised as follows:

Travel and Mobility – General and Urban Areas

Modal Shift

The Draft CDP sets out a policy shift towards compact growth and consolidating town and villages in line with national and regional policy. The Strategic Environmental Assessment (SEA) at Volume 10 (b) (i) includes the following Strategic Environmental Objectives to address Climate Change:

- CC1 – Reduce the need to travel/increase use of public transportation and achieve modal shift in transport across the county;
- CC2 – Decrease the usage of fossil fuels and increase both renewable resource usage and protection together with a move towards more low carbon energy sources.

Objectives CC1 and CC2, in combination, are given effect in the Development Plan in Chapter 2 Climate Action, under Objective CDP2.15, which reads as follows:

> **CDP 2.15 Development Plan Objective: Renewable Transport**
> It is an objective of Clare County Council:
> a) To seek initiatives that will achieve the decarbonisation of the transport sector, moving to the use of clean generated electricity bio-gas hydrogen and other non-fossil fuels for private and public transportation and the provision of clean energy and low carbon fuelling stations by 2030;
> b) To reduce reliance on private cars and achieve modal shift to sustainable transportation in conjunction with policies to achieve compact growth and reduce congestion;
> c) To seek the development of clean energy and lower carbon fuelling and electric vehicle charging stations and infrastructure at appropriate locations in the County which take into consideration electric, hydrogen, CNG/biogas inter-alia; and
> d) To support actions to transition the movement of freight, ports and airports to a low carbon future.

Appendix 9 to Volume 1 sets out the Implementation and Monitoring Framework of the draft Development Plan. It sets out the Key Performance Indicator (KPI) / Data Source for monitoring and evaluation of each objective.

For Objective 2.15 'Renewable Transport' the KPIs are:

- No. of people walking/using public transport /other sustainable modes of travel i.e. changes of baseline data;
- No. of planning applications for larger developments that include EV points;
- No. of EV points included on CCC owned properties including public car parks.

The Planning Authority acknowledge the value in requesting specific targets to measure or analyse the achievement of this modal shift. This has been requested in a number of submissions on the draft CDP. In response to this submission, I consider that the appropriate location within the CDP to address modal shift in transport is at Section 11.2.2 'Integrated Land Use and Transport Planning'. I recommend that baseline mode share figures are included there. See my recommendation below for details of the amendment.

In relation to the setting of mode share targets and targets regarding modal shift to non-car travel, I consider that the appropriate target is to achieve a modal shift to sustainable transportation (as expressed in CDP2.15 (b)), i.e. that the share of travel by non-car modes would increase and not decrease.

I do not consider that it is worthwhile at present for the Council to set specific numerical targets. It is appropriate to target solely that the share of travel by non-car modes would increase from the baseline.

The baseline data from POWSCAR (Census 2016) shows that non-car trips account for a range between 20%-32% across the 5 settlements at the top of the settlement hierarchy - Ennis (Key Town) Shannon (Metropolitan Town) and the Service Towns of Scarriff / Tuamgraney, Shannon and Kilrush. This shows the dominance of car-based trips to work or school originating within those settlements. The non-car mode share outside of those settlements is likely to be even lower. I consider that Co. Clare is at the beginning of a critical phase wherein the shift to sustainable travel modes will be facilitated to a much greater extent than it has in the past. This is due to enhanced policy support in the draft CDP for:

- Consolidation of development into town and village centres in accordance with the 10-minute town concept;
- Compact Growth of settlements;
- Improvement of permeability for walking and cycling in existing developed areas;
- Support for behavioural change regarding active travel;
- Mobility Management at organisational level.

It is also due to improvements in the provision of transport infrastructure and services locally in the following manner:

- Enhancement of road and footpath networks within settlements under the Active Travel Programme investment;
- Enhancement of TFI Local Link Limerick Clare Bus Services;
- Enhancement of bus services through Connecting Ireland and Limerick BusConnects;
- Implementation of measures within draft LSMATS.

I consider that once the relevant results of the 2022 Census and the subsequent 2026 Census are compared to the 2016 Baseline that will be included in the CDP Plan for 2023-2029, the preparation of the next CDP commencing in 2027 will be better placed to set mode share targets for the duration of the next CDP.

Additionally, I consider that the following Objectives and requirements (among others) within the CDP provide a sufficient basis for modal shift, without the need to set out specific targets for each mode:

- Objective CDP 2.15 on Renewable Transport;
- Objective CDP 6.13 relating to High Quality Development and the provision of travel and mobility solutions;
- Objective CDP10.16 ' Primary and Secondary Education'(as revised in response to NTA submission S2/625);
- Objective CDP 11.2 relating to Transport Planning (as revised in response to NTA submission S2/625);
- Objective CDP 11.3 relating to LSMATS and Transport Planning;
- Objective CDP 11.5 relating to Walking and Cycling;
- CDP 11.6 relating to the rail network;
- CDP 11.8 'Bus Transport';
- CDP 11.19 Shannon International Airport;
- The Development Management Guidelines which specifically set out the requirements for new developments (residential and others).

Behavioural Change in Travel
The submission seeks that the CDP include a commitment "to provide clear guidelines on how to effect behavioural change to meet objective CDP 2.1 (c) e.g. awareness campaigns in schools, public notices, information nights etc".

Objective CDP 2.1 concerns Climate Action and according to the text immediately preceding CDP 2.1, the Council seeks to "support a reduction in greenhouse gas emissions through actions such as the promotion of climate change awareness and behavioural change". The Council therefore sees merit in behavioural change initiatives in addressing Climate Change. The Green Party submission highlights behavioural change in the context of travel and mobility and the Council is satisfied that comprehensive policy support is provided in the draft CDP for behavioural change measures in land use and transport through the policies and objectives contained in particular within:

- Chapter 2 Climate Action;
- Chapter 10 Sustainable Communities;
- Chapter 11 Physical Infrastructure, Environment and Energy;
- Volume 3 Settlement Plans.

In this regard however, there is an opportunity to strengthen the policy basis for behavioural change initiatives as they apply to school travel. Therefore, I recommend that measures of this type are given policy support in Volume 1 (Chapter 11- Physical Infrastructure, Environment and Energy) and in Volume 3A Ennis Settlement Plan, under Section 1.9.1 'Strategic Aims for Travel and Mobility'. The details of those amendments are set out in my recommendations below.

I consider that many of the local-level measures suggested in the submission (parking, pedestrian crossing, permeability access points) are being progressed by the Council through its development management function, its role as a roads authority and through schemes being implemented at the Municipal District level such as the Active Travel Programme. I consider that the development plan provides appropriate policy support for measures of this nature.

Travel and Mobility - Ennis

The submission concerns measures to a potential forthcoming local bus network for Ennis. The bus network planning phase of that initiative has not been completed and it would be premature to include measures concerning such matters as its frequency, coverage and cost in the draft CDP.

In relation to Park and Stride, as discussed above I intend to propose amendments to the draft CDP such that active travel behavioural change measures (including Park and Stride) are given stronger policy support. This will give effect to the ongoing work of the Ennis 2040 DAC project team as regards provisions for Active Travel. See my recommendation below. I also seek to amend the wording of Section 1.9.1 to reflect updated policy provision for transport in Ennis.

I acknowledge the compatibility of Ennis with the 10-minute town concept. The suitability of the urban structure of the town to cater for travel by sustainable modes has been highlighted in Ennis 2040 which is the long-term strategic economic and spatial plan for the town. The optimisation of the sustainable transport networks of Ennis will be a key focus of the forthcoming preparation of the statutory Local Area Plan for Ennis town and environs.

Travel and Mobility - Rural areas / interconnectivity

The development of the West Clare Railway Greenway is at the very early stages of preliminary route identification which will subsequently identify the surveys required to inform the environmental assessments associated with the preferred route. The identification of the preferred route will however take into consideration linkages to local communities to maximise its use for commuting and leisure by the wider local community. It will also look at and address linkages across the community such as those connecting to Active Travel Routes. TFI Local Link Limerick Clare is a company set up for the express purpose of providing transport to communities within Counties Limerick and Clare. TFI Local Link Limerick Clare is a not-for-profit company and is one of fifteen Transport Coordination Units for rural transport funded by the Department of Transport, Tourism & Sport and administered by the National Transport Authority. This is now serving the local communities of our counties and linking with other forms of transport. Volume 3 (a, b, c, d) of the draft CDP contains the Settlement Plans for the settlements of Co. Clare. I have recommended written amendments to those settlement plans to provide greater prominence to the TFI Local Link Limerick Clare services that play a vital role in the vitality of those settlements (on foot of the submission from TFI Local Link Limerick Clare S2/945).

Public realm including community/culture education and recreation/biodiversity

I consider that setting targets as to the number of Green Infrastructure projects to be achieved in the lifetime of the Plan may be counter-productive and seen as a ceiling which

has to be reached. There should be no upper limit to the number of Green Infrastructure projects across the county and it should be explored at every opportunity.

The Community Support Scheme which Clare County Council administers is to encourage and assist community and voluntary groups to take an active part in the development of their communities and to improve the quality of life experience in their areas. This fund is and can be used to enhance biodiversity within residential developments with many successful projects implemented across the county over the years. This fund will continue to be available over the duration of the Plan cycle.

In relation to pedestrian/cycle routes from residential to amenity areas, the enhancement of such routes is achieved through schemes being implemented at the Municipal District level such as the Active Travel Programme. Additionally, as stated above, the optimisation of the sustainable transport networks of Ennis will be a key focus of the forthcoming preparation of the statutory Local Area Plan for Ennis town and environs.

The Rocky Road and lands around it are currently in private ownership with a Right of Way identified through it which is maintained by the property owner. The Clare CDP 2023-2029 zones this area as Buffer Space in order to protect its biodiversity and amenity value.

Clare County Council is aware of the Department of Agriculture, Food and the Marine, Guidance for Local Authorities to ensure compliance with the Sustainable Use of Pesticides Directive issued on the 25th of March 2021. In conjunction with our Municipal District Offices, Rural Directorate in terms of liaising with community groups together with the Environmental Awareness Officer will continue to raise awareness and reduce and further eliminate the use of herbicide and pesticide use across the county. Clare County Council have no remit over the use of pesticides within the Burren National Park. However, the NPWS through their rangers on the ground will also ensure that the use is phased out over time. Within the Burren National Park Glyphosate is used on the cut hazel. It is brushed on and therefore is a directed/specific use. The alternative, according the NPWS, would be to allow the Burren 'to go to Hazel' and thereby loose the species rich/orchid rich grasslands.

Clare County Council signed up to the All-Ireland Pollinator Plan (AIPP) in February 2020. As signatures to the AIPP, Clare County Council has committed to implementing the 30 actions listed in the guidance document 'Councils actions to help Pollinators' including Action 19 and 20 to reduce or eliminate the use of pesticides and adopt the pollinator-friendly pesticide code.

The Clare County Council Biodiversity Manual 'Biodiversity Best Practice Guidelines for Clare County Council Staff and Elected Members' specifically sets out an operational Procedure regarding Herbicide Use and provides resources and background literature on the use of herbicides and insecticides.

There are over 45 Tidy Towns Groups in Clare, with more and more new towns and villages (along with Ennis, who are the regional winners for three years in a row) entering the "Let's Get Buzzing" Local Authority Pollinator Award every year as part of the Tidy Towns competition.

The Council's Ennis Municipal District office are researching new measures to eliminate the use of chemicals on an ongoing basis and have trialed the use of alternative methods including steam.

I do not propose to amend the draft CDP on the basis of any of the points made in relation to 'Public realm including community/culture education and recreation/biodiversity'.

Housing

The submission requests that targets are established as regards:

- The number of unused commercial spaces and derelict buildings in town centres to be brought back into use;
- The number of thermal upgrades of public authority homes;
- A target for repurposing pockets of open space within existing residential area.

The draft CDP includes Objective CDP17.7 'Town and Village Centre Vacancy' which is in Chapter 17 'Towns and Villages'. It is Council policy (stated in CDP17.7) "to facilitate a co-ordinated and proactive approach to address vacancy in the Plan area, including liaising with owners, identifying barriers to use and examining design solutions proposed by owners to resolving identified difficulties".

The Draft Plan also contains policies and objectives for derelict sites including Objective CDP17.10, in Chapter 17, which expresses the Council's commitment to using all mechanisms available to it as appropriate and to work with Derelict Site owners to identify opportunities to bring derelict sites back in to use. Such mechanisms include the use of the Derelict Sites Act 1990 where appropriate to require owners to carry out suitable improvements, and to acquire properties which are appropriate to the Council's Capital Programme in order to carry out improvements to derelict sites and revitalise the surrounding areas. In this regard, Clare County Council's Derelict Sites Team have responsibility for dealing with derelict sites in County Clare including investigating all reports of dereliction and taking enforcement action in accordance with the Derelict Sites Act 1990. Objective CDP5.2 in Chapter 5 to prioritise the reuse of existing housing stock in the Plan area and the renovation and re-use of obsolete, vacant and derelict homes. In addition, one of the priorities for the main public spaces in the towns and villages is set out in Section 18.3.3 Placemaking and Amenity in Settlements, Chapter 18, is to examine causes of vacancy/dereliction. In addition, Objective CDP17.1 in Chapter 17 confirms the Council's commitment to carry out public realm enhancement works as well as retail health checks, vacant site and derelict site surveys and other essential research and analysis to inform the actions required to support town and village centre renewal and development projects across County Clare.

I also note the provisions of Article 10(6) of the Planning and Development Regulations 2001 (as amended), which provide for changes of use from vacant commercial to residential to be carried out in certain circumstances as Exempted Development. The developer in such instances is required to notify the planning authority in writing of the change of use and it is entered in a record by the planning authority which is available on the planning authority's website. For all years from 2019 to 2026 the planning authority has / will provide information

to the Minister on the number and nature of notifications received by it. Therefore I consider that the planning system has scope for monitoring instances of vacant commercial buildings being brought into residential use. Monitoring planning permissions for the same change of use and other changes of use is also possible. The mechanism for exempt changes of use as described above is a new initiative and over a number of years a profile will emerge of the annual number of such conversions and targets can then be set for subsequent years.

The targets which have been set in the draft CDP and specifically within the Renewable Energy Strategy with respect to Renewable Energy are based on the findings of the Energy Emissions Balance which was prepared to inform the strategy. The targets should not be interpreted as a ceiling either in terms of ambition or to be exceeded. Clare County Council feels it is important that the adoption of renewable technologies is aligned with a balanced, sustainable and plan-led approach and will be realised in line with the overall goal of a low carbon economy through renewable energy generation.

While Clare County Council do take in charge housing developments once complete, the Council no longer have a remit to maintain open space or green areas. These areas are maintained by the residents. Significant change has been effected across the county in many of these spaces through community engagement such as Tidy Towns and through the local Municipal District Offices with funding allocated to establish biodiversity zones, no-mow areas and planting of native trees. I consider that this should not be capped with a target but instead continue to be promoted through our local offices and on the ground.

I do not propose to amend the draft CDP on the basis of any of the points made in relation to Housing.

Ennis Municipal District/ Ennis 2040

TS9 - Proposed Data Centre

I agree with the requested inclusion, at Volume 3(a) section 2.14 of a climate impact assessment. My recommendation below sets out the amendment.

TS6 – proposed wetlands and enterprise centre

The council notes your concerns in relation to the potential development of TS6 and specifically the potential impacts to the Architectural heritage of Clare Abbey and the potential loss of wetland habitat. No development of this site can take place without implementation and adherence to the mitigation measures as identified through the preparation of the SEA associated with Ennis 2040 and incorporated into the new Clare County Development Plan 2023-2029 through the SEA process. These measures seek further assessment of the habitats present, the flood storage function, local landscape appraisal to mention but a few. The measures are detailed in Appendix D of the SEA Environmental Report and will ensure no negative effects occur through any potential development. As part of the review of this submission and the habitats present both within the site and upstream associated with the Gaurus River an area of Open Space zoning has been changed to Buffer Space in order to maintain and protect our natural carbon sinks

(bogs/marshes/forests/fens/Peatland and Wetlands) as decarbonising areas which can serve a dual purpose in terms of enhancement of biodiversity and mitigation against Climate Change. The habitat located here is an example of Wet-Willow-Alder-Ash Woodland (WN6) and provides a key wetland habitat in the head waters of the Gaurus River which feeds into the River Fergus which forms a key component of the Lower River Shannon and Fergus Estuary SAC. See my recommendation below.

TS 3 - The Post Office field -

The Council notes your concerns in relation to the potential development of TS3 and specifically your concerns as to the impact on wildlife within the Post Office field. No development of this site can take place without implementation and adherence to the mitigation measures as identified through the preparation of the SEA associated with Ennis 2040 and incorporated into the new Clare County Development Plan 2023-2029 through the SEA process. These measures seek further assessment of the habitats present, the inclusion of buffer spaces for wildlife, assessments in relation to the bird life and consideration of any structure used on the site to mention but a few. The measures are detailed in Appendix D of the SEA Environmental Report and will ensure no negative effects occur through any potential development. I do not propose to amend the draft CDP on the basis of the submission regarding this issue.

Proposed transformational project

Your proposal in relation to the inclusion of an additional transformational project to develop a centre of excellence for renewable energy and/or housing upgrades is welcomed and considered appropriate. Such a project could be considered as part of one of the identified Transformational sites in particular Transformation Site 7 Roche where the former Roche Ireland Ltd site is located on a large site that has been zoned for mixed use in Clarecastle and identified as a Transformational and Opportunity Site (TS 7) (OP19). A masterplan will be prepared during the life of this Plan to facilitate and encourage the appropriate redevelopment of this brownfield site. I do not propose to amend the draft CDP on the basis of the submission regarding this issue.

Clare Renewable Energy Strategy.

Clare County Council acknowledge the urgency of the need to meet the existing wind energy targets of 550MW. County Clare has substantial renewable energy resources, of which Wind is the greatest asset, and will seek to maximise its potential. The capacity to harness Clare's resources and generate energy will need to be balanced along with other considerations including community acceptance of energy infrastructure, the ecological and environmental impact of energy generators, energy infrastructure capacity and development, landscape characteristics, and land use changes. Furthermore, locational considerations such as proximity to, or within designated areas such as NHA, SPA and SAC, proximity to suitable demand centres, energy, and transport infrastructure, and competing economic and social interests present challenges which will need to be navigated to achieve targets as set out.

While the RES identifies areas which are Acceptable in Principle or Open to Consideration at a strategy level the competing interests as outlined above are subsequently carefully considered on a site by site basis at planning application stage and depending on the outcome of these assessments applications are permitted or not. The targets as established in the RES

should not be interpreted as a ceiling that needs to be met or indeed that acts as a cap. The achievement of the objectives as outlined has been carefully informed by the Energy Emissions Balance prepared to inform the preparation of the RES and in that regard the targets are deemed appropriate. I do not propose to amend the draft CDP on the basis of the submission regarding this issue.

Air quality.

Section 5.92 of the SEA Environmental Report specifically addresses the Air Quality issue in Ennis and outlines how during one week in December 2020, where the WHO air quality guidelines warn that particulate matter, associated with the burning of solid fuels, should not exceed 25 micrograms on a 24-hour average, in Ennis reached 393 on one night. This would suggest that people could still be burning smoky coal, despite a ban introduced several years ago. In addressing this issue Clare County Council through their Environment section are responsible for the enforcement of the Air Pollution Act (Marketing, Sale, Distribution and Burning of Specified Fuels) Regulations 2012. Local Authorities are primarily responsible for the enforcement of the smoky coal ban within their functional areas. The powers that Local Authorities have are extensive. For example:

- Local Authority staff may undertake inspections of premises and vehicles being used for the sale and distribution of solid fuel as well as collect samples;
- a Local Authority may bring a prosecution under the Air Pollution Act for breaches of the Regulations;
- a Local Authority may issue a Fixed Payment Notice (or 'on the spot fine') for alleged offences relating to the marketing, sale and distribution of prohibited fuels in Low Smoke Zones (LSZs), with a penalty range of €250 to €1000.

A traffic monitor has been installed on Harmony Row in Ennis by Telraam with the data publicly available through the following link; https://telraam.net/en/location/9000003358. Clare County Council will use this information to inform future development of Ennis as a 10 minute town.

Light Pollution.

In response to a comment on CDP Objective 11.42 in the DoHPLG submission I intend to include reference to EUROBATS guidelines in conjunction with CDP11.42.

The Road Management Office in Clare County Council has undertaken Screening for Appropriate Assessment with respect to the Public Lighting Energy Efficiency Project for Clare which will see urban lighting changed to LED. This assessment took into consideration the impacts on protected habitats and species. In addition, all planning applications across the county which may have an impact on Bat species given their sensitivity to changes in light levels are required to prepare a Light Spill Model together with an assessment of the impacts on these species in accordance with the Bat Conservation Ireland Guidance on Bats and Lighting together with the Bat Conservation Trust - Institute of Lighting Professionals Bats and Artificial Lighting in the UK guidance note.

LED lighting may be adding an additional pressure on urban ecology and wildlife and in this context during the lifetime of the Plan a study on the LED light penetration in public street

lighting in urban areas may be addressed. However, I do not propose to amend the draft CDP on this issue.

Chief Executive's Recommendation

Travel & Mobility.

Volume 1 Chapter 11: The following shall be inserted at Section 11.2.2 'Integrated Land Use and Transport Planning', before Objective CDP11.2.

The following table provides a baseline of the travel mode share for each settlement. The data shows the Mode Share of all persons commuting to Work and Education from residential origin points in Ennis (Key Town) Shannon (Metropolitan Town) and the Service Towns of Scarriff / Tuamgraney, Shannon and Kilrush. The source of the data is the CSO POWSCAR database which is derived from the Census of 2016.

Settlement		Walk	Cycle	*Public Transport	Car	Car Passenger	**Other Modes
Ennis	All trips %	**14.6**	**1.8**	**4.9**	**52.0**	**23.4**	**3.3**
	Work Trips %	10.4	2.0	2.0	74.8	6.1	4.8
	Edu Trips %	22.9	1.4	10.6	6.7	57.9	0.4
Shannon	All trips %	**23.7**	**3.0**	**5.8**	**47.1**	**17.9**	**2.5**
	Work Trips %	11.8	2.5	3.7	68.8	9.4	3.8
	Edu Trips %	45.4	3.8	9.7	7.5	33.5	0.2
Scarriff-Tuamgraney	All trips %	**20.0**	**0.5**	**2.4**	**46.3**	**25.1**	**5.6**
	Work Trips %	9.3	0.0	0.4	74.1	7.6	8.5
	Edu Trips %	36.2	1.3	5.5	3.9	51.8	1.3
Ennistymon-Lahinch	All trips %	**16.4**	**1.0**	**2.8**	**49.5**	**24.7**	**5.5**
	Work Trips %	11.8	1.3	1.3	71.0	6.4	8.2
	Edu Trips %	25.5	0.4	5.6	7.7	60.4	0.4
Kilrush	All trips %	**23.2**	**2.1**	**4.4**	**42.0**	**21.6**	**6.8**
	Work Trips %	17.3	2.9	0.7	63.1	5.6	10.4
	Edu Trips %	32.7	0.7	10.3	8.0	47.2	1.1

*Public Transport Includes Bus and Train

**Other Modes Includes Motorbike,Van, HGV

Travel Mode Share by Settlement (2016 Baseline). Source: CSO POWSCAR, NTA, Clare County Council

Behavioural Change in Travel

In order to achieve consistency throughout the Plan, both Volume 3a Section 1.9.1 'Strategic Aims for Travel and Mobility' & Volume 1 Development Plan Objective CDP11.5: Walking and Cycling, to be amended. I also seek to amend the wording of Section 1.9.1 to reflect updated

policy provision for transport in Ennis.

Volume 3a Section 1.9.1 Strategic Aims for Travel and Mobility

In order to successfully achieve the overall goals in relation to travel and mobility in the Ennis and Environs Area, the following strategic aims will be proactively pursued:

- To prepare and implement Local Transport Plan for the Ennis Town and Environs area, incorporating a Strategic Environmental Assessment and an Appropriate Assessment, during the lifetime of this Development Plan;
- To support continued investment in measures to improve sustainable transport through the Active Travel Programme;
- To support Ennis as a mobility hub for County Clare;
- To support the preparation of a Mobility Plan for Ennis, to facilitate the delivery/development of key Town Centre transformation and opportunity sites and public realm enhancement initiatives;
- To adopt the '10 minute town' model to inform improvements that are required to ensure pedestrian permeability and prioritise walking as the preferred mode of transport in the settlement area, particularly in Ennis Town Centre;
- To enhance and promote high amenity walking routes in the settlement area;
- Support and promote initiatives such as Park and Stride, Green Schools Travel and Safe Routes to School Programmes and the concept of having safe routes to school;
- To provide additional parking facilities;
- To support and facilitate improvements to public transport services and infrastructure in the settlement area including the delivery of Ennis Local Bus Service; and
- To work with relevant stakeholders to address the transportation needs of businesses operating in the Town Centre area.

Volume 1 Development Plan Objective CDP11.5: Walking and Cycling, to be amended as follows:

Development Plan Objective: Walking and Cycling	
CDP11.5	It is an objective of Clare County Council: a) To require walkability and accessibility to be a central consideration in the planning and design of all new developments, transport infrastructure and public transport services; b) To facilitate and support the delivery of a safe, accessible and convenient cycle network and environment across the County and in the Limerick-Shannon Metropolitan Area as set out in the Cycle Network Plans; c) To support the development and enhancement of long-distance cycling routes in County Clare, in accordance with the *Strategy for the Future Development of National and Regional Greenways*; d) To safeguard, where feasible, the route of the old West Clare Railway which has not been affected by existing development and to encourage its use for recreational purposes and/or as part of a tourist

	attraction. Exceptions to this include short sections within the curtilage of residential or commercial property; e) To support the development of cycle-lanes in urban areas linking residential areas to town centres, employment centres and school locations; f) To support the development of new accessible walking routes and trails throughout the County; g) To support and promote initiatives such as Park and Stride, Green Schools Travel and Safe Routes to School Programmes and the concept of having safe routes to school; ~~g~~h) To support the enhancement of permeability, footpaths and the provision of safe crossing points in the towns and villages of the County; ~~h~~i) To support the creation of a safer environment for cyclists and signposted 'quiet routes' off the arterial roads which include speed limit reviews and junction redesigns where appropriate; ~~i~~j) To require significant walking and cycling route proposals to provide a Quality Audit, as referred to in the *Design Manual for Urban Roads and Streets*; and ~~j~~k) To ensure the development, enhancement, safeguarding of all walking and cycling routes are in compliance with the environmental requirements of Objective CDP3.1.

Volume 3(a) section 2.14 'Technical Guidance – Transformational and Opportunity Sites' to be amended as follows:

TS9- Data Centre – Toureen

Project Ireland 2040 – National Planning Framework sets out the strategic importance of data centres in Irelands Enterprise Strategy. The zoning on site (ENT3) offers great potential in the short to medium term and can accommodate the economic activities required to grow Ennis as a location for significant employment.

The zoning on the site would provide for a data centre campus arrangement that can allow for future growth and the delivery of premises that may need to differ from normal commercial developments due to the changing nature of IT and data centre services.

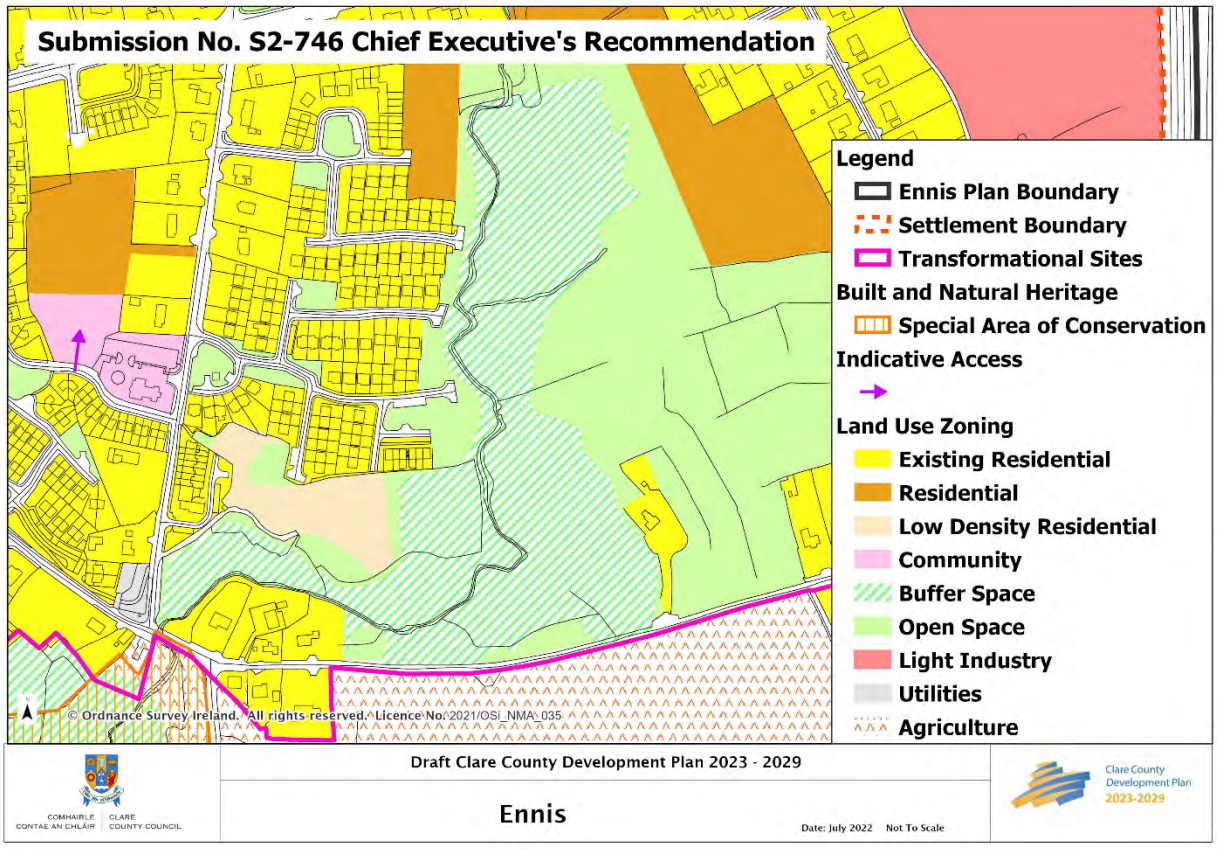
Development proposals for this site shall include the following:

- A Traffic Management Plan for the construction and operation phase of development;
- Any proposed development shall adopt sustainable practice in terms of building design, materials, construction and operation;
- A Hydrological Assessment to determine the effects of the development on groundwater's and groundwater quality shall be submitted with development proposals for the site;

- At the southern boundary of the site is a mesotrophic lake, which will require protection through the provision of a buffer incorporating the dense clump of trees to the west of the lake and shall be included in an overall Landscape Management Plan for the site.
- A Construction and Environmental Management Plan shall be submitted as part of development proposals on site. This shall include a Flood Risk Assessment, a Surface Water Management Plan for the construction and operation phase of the development, a Pollution Prevention Plan and shall incorporate principles of Sustainable Urban Drainage Systems. During the construction phase of developments on site where applicable all relevant best practice guidelines shall be adhered to;
- An Air Quality Impact Assessment with reference to potential impacts on European Sites and the surrounding area within the zone of influence of the proposed development shall be submitted, this shall inform an Appropriate Assessment Screening report and/or Natura Impact Report;
- A Climate Impact Assessment which addresses the impacts of both the energy requirements and the heat generated from the facility in terms of our Climate Change Targets as outlined in CAP 2021;
- The hedgerows and scrub area on this site provide a potential foraging and commuting area for wildlife including Lesser Horseshoe bats. Future development proposals must be informed by a series of Bat Surveys to record the known usage of the site by in particular Lesser Horseshoe bats and ensure that there is no net loss of supporting habitat. The surveys must include a full Light Spill Modelling Study. Any habitat loss must be offset by additional landscape planting to ensure connectivity across the landscape;
- Impacts of development of the site on conservation interest bird species of surrounding SPA's and breeding birds should be avoided, through protection and retention of breeding bird habitat in accordance with the Wildlife Acts. Development proposals for the site shall be accompanied by bird surveys (to include a winter bird survey) to assess the use of the site by bird species and where disturbance and/or displacement are predicted appropriate mitigation measures shall be identified. Hedgerow and treeline pruning or removal shall be conducted outside the breeding bird season (March 01st through August 31st);
- An Ecological Impact Assessment (designed by an appropriately qualified landscape architect and ecologist) and a Habitat Survey shall form part of development proposals for the site;
- A Landscape and Biodiversity Management plan shall be submitted to provide landscape, visual and environmental screening and enhancement measures through planting and design;
- An Invasive Species Survey and Management plan (if required) shall accompany development proposals for the site;
- Development proposals shall also include an Otter Use Survey of the site, and where disturbance and/or displacement are predicted appropriate mitigation measures shall be identified;
- A buffer will be required to be provided with regard to the location of a National Monument (CL- 034-007) on site; and

- Adequate wastewater treatment and disposal measures shall accompany development proposals for this site to ensure that there is no impact to water quality in the area.

Volume 3A Ennis Settlement Plan map to be amended by changing an area of Open Space zoning to Buffer Space. See map below.



Submission No: S2/747 –Clare IFA	
Relevant Chapters / Topics	• Agriculture • Green Infrastructure • Biodiversity • Flood Management • Bio-Energy • Land Use Zoning

Summary of Issues Raised in Submission

This submission outlines concerns in relation to key strategic issues and puts forward the following proposals for consideration:

Flood Risk Management/Green Infrastructure & Biodiversity

Request to add an additional objective to **CDP2.12:**

> *"To facilitate and implement ongoing repair and maintenance to grey flood and drainage infrastructure' such as embankments, dykes, channels and rivers as a means of managing flood risk and enhancing the natural environment and farmland habitats in the Plan area in compliance with Objective CDP 3.1"*

Community Energy

Request to add an additional objective to **CDP2.16**:

> *"To explore and assist finance the development of community owned energy initiatives at appropriate locations across the County."*

Bio-Energy

Request to amend wording in objective to **CDP2.19**:

> "To facilitate and support the development of bio-energy opportunities, facilities, and associated enterprises throughout the County including on *agricultural lands and* brownfield sites subject to normal planning considerations"

Urban & Rural Settlement Strategy

Request to amend wording in objective **CDP4.14, Category A – Economic Need**:

> "Such persons shall be defined as persons who by the nature of their work *or through existing and immediate family ties* have a demonstrable economic need to reside permanently in the rural area close to their place of work. Such circumstances will normally encompass persons or through existing and immediate family ties, *who are* involved in fulltime farming, *Agritecth and Agrifood sectors,* horticulture, forestry, bloodstock or marine-related activities …"
> "Similar part-time occupations will also be considered where it can be demonstrated that *either* the predominant occupation *or* the ancillary occupation(s) …"
> "Where a person's economic need relates to their engagement in farming or bloodstock they shall have a minimum farm size of *3.0* hectares within the local rural *area. If the applicant is engaged in pig, poultry, vegetable and fruit farming and is a registered food producer with the department of Agriculture Food & the Marine this limit will be removed.*"

"… the person's predominant occupation relates to, horticulture farming , Agritecth and Agrifood sectors, forestry, bloodstock activities on their landholding *or marine-related activities*, and which also demonstrates the viability of the activity(s)."

Request to amend the wording in objective CPD4.14 Category B – Social Need:

"A person who is an intrinsic member of a local rural community who was born within the local rural area, or who *through existing and immediate family ties is* living …"
"This includes returning emigrants *and students* seeking a permanent home in their local rural area …"

Agricultural Developments

Request to add an additional objective to CDP6.20:

"*Protect good quality agricultural lands from development which could be accommodated elsewhere and that would undermine the future agricultural productivity of the lands or irreversibly harm the commercial viability of existing or adjoining agricultural land*
Facilitate the sustainable modernisation of agriculture and to encourage best practice in the design and construction of new agricultural buildings and installations to protect the environment, natural and built heritage and residential amenity."

The Food Industry

Request to add additional objectives to CDP6.21:

"*b) Support and facilitate the implementation of the strategic objectives of Food Vision 2030 – A World Leader in Sustainable Food Systems to sustainably develop the agricultural and food sectors that contribute enormously to the economic development of rural areas c) To support and facilitate the development of food-hubs as a contributor to the growth of the indigenous food industry in Clare, supporting local producers and locally sourced ingredients producers. d) Engage and collaborate with key stakeholders, relevant agencies, sectoral representatives and local communities to develop the agri-food sector in Clare, to promote and showcase the agri-food sector, and to ensure that the economic potential of the sector is secured for the benefit of the local and national economy. e) Support and promote the hosting of markets (including farmers markets) in towns/villages throughout the county*."

Chapter 8 Rural Development and Natural resources

Request the addition of 1 line to the strategic aims:

"*To maintain and support into the future the County's rural/coastal communities including the traditional family farm;*"

Request amendment to objective CDP8.3:

"i) Alternative farm enterprises, agri-tourism, agri-tech, agri-food, primary food processing projects and farm shops;"

Request amendment to objective CDP8.4:

"*e) To maintain and support into the future the County's rural/coastal communities including the traditional family farm; f) Protect good quality agricultural lands from large scale development which could be accommodated elsewhere and that would undermine the future agricultural productivity of the lands or irreversibly harm the commercial*

viability of existing or adjoining agricultural land."

Request amendment to objective CDP8.5:

"*c) Support farm shops in rural areas where it is ancillary to an existing farm complex. d) Facilitate and support sustainable employment initiatives and the development of value-added opportunities linked to food, horticulture and agriculture and also support the development of village shops in villages and small village settlements where the scale of the development is compatible with the rural character of the area. e) Facilitate, support and encourage community-owned and managed shops and local services.*"

Recreational Routes

Request amendment to objective CDP10.11:

"*i) To ensure the procedures and practices contained within the Code of Best Practice (TII agreement) for National & Regional Greenways are carried out for all greenway and blueway corridors within the county*."

Countryside Recreation

Request amendment to objective CDP10.12:

"*c)To support and promote the Leave No Trace Outdoor Ethics Education Programme designed to promote and inspire responsible outdoor recreation through education, research and partnerships*"

Walking & Cycling

Request amendment and an addition to objective CDP11.5:

"d) To safeguard, where feasible, the route of the old West Clare Railway *or other alternative less intrusive routes* which has not been affected by existing development *including good quality agricultural lands* and to encourage its use for recreational purposes and/or as part of a tourist attraction. Exceptions to this include short sections within the curtilage of residential or commercial property *and land used for commercial food production*"

"*i) To ensure the procedures and practices contained within the Code of Best Practice for National & Regional Greenways are carried out for all greenway and blueway corridors within the county*"

Coastal Erosion & Flooding

Request an addition to objective CDP13.11:

"*i) To facilitate and implement ongoing repair and maintenance to grey flood and drainage infrastructure' such as embankments, sluice gates, dykes, channels and rivers as a means of managing flood risk and enhancing the natural environment and farmland habitats in the Plan area in compliance with Objective CDP 3.1*"

Green Infrastructure & Climate Change

Request an addition to objective CDP15.30:

"*i) To ensure the procedures and practices contained within the Code of Best Practice for National & Regional Greenways (TII Agreed code of practice) are carried out for all greenway and blueway corridors within the county*."

Town & Village Centre Vacancy

Request additions to objective CDP17.7:

> "*e) Support farm shops in rural areas where it is ancillary to an existing farm complex. d) Facilitate and support sustainable employment initiatives and the development of value-added opportunities linked to food, horticulture and agriculture and also support the development of village shops in villages and small village settlements where the scale of the development is compatible with the rural character of the area. f) Facilitate, support and encourage community-owned and managed shops and local services*"

Request an addition to objective CDP17.8:

> "*b) anyone wishing to build a house in rural areas which are suffering persistent and substantial population decline will be accommodated subject to in line with normal site suitability considerations*"

Zonings

Request an additional to objective CDP19.20:

> "*b) To develop a policy framework for all future Land-use zoning designations, whereby each landowner is notified by formal consultation in advance of the intention to designate or alter zoning objectives for settlement plans land-use zoning categories*"

Request that the following proposal to be included:

"1. The addition of Nieces and Nephew to this definition of immediate family members. 2. Additional categories of permitted applicants under Agriculture development proposals a. Persons taking over the ownership and running of a farm on a full-time basis, who wish to build a first home on the farm, or close proximity to their workplace for their permanent occupation, where no existing dwelling is available for their own use. The proposed dwelling must be associated with the working and active management of the farm. b. Other persons working full-time in farming or the marine sector for a period of over seven years, in the local rural area where they work and in which they propose to build a first home for their permanent occupation."

Chief Executive's Response

I wish to thank the Clare IFA for the submission, and I acknowledge the importance of the farming community in our rural County.

Flood Risk Management/Green Infrastructure & Biodiversity

River maintenance is separate from Planning Legislation and is governed by the Arterial Drainage Acts amongst others. The OPW is the lead Authority in this regard and accordingly is outside the scope of the Development Plan.

Community Energy

The Local Authority is not in a position to fund community energy projects and any objective stating this would be misleading.

Bio-Energy

CDP2.19 states Bio- energy facilities will be supported throughout the County, and I see no reason to explicitly mention agricultural land.

Urban & Rural Settlement Strategy

The ethos of CDP4.14, Category A is "Economic Need" being a person who by their nature of work have a demonstrable economic need and including those mentioned says "as well as others who can demonstrate a genuine need because of their occupation….." therefore I do not see merit in adding additional categories of persons to the existing list.

Similarly, 12.5hectare farm holding as cited in Category A is deemed reasonable.

CPD4.14 Category B – Social Need:

I do not believe it appropriate to include underlined text as below

"A person who is an intrinsic member of a local rural community who was born within the local rural area, or who through existing and immediate family ties is living …"

"This includes returning emigrants and students seeking a permanent home in their local rural area …" of "This includes returning emigrants and students seeking a permanent home in their local rural area …".

The ethos of this policy is based on "social need" applicants who are able to demonstrate a social need to live in the local rural area will be compliant with the policy and social need is not necessarily or exclusively based on family ties.

Agricultural Developments

Chapter 3 Core Strategy sets out the vision for the county and gives spatial expression to future development through a settlement hierarchy and settlement strategy. The ethos of the Plan is to build on cities and metropolitan areas as engines of growth and seeks in parallel to re-position the region's strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart manner to create a sustainable competitive advantage for the county. The Plan provides zoned land across serviced settlements and provides policies for unserviced settlements and rural areas to direct development appropriately. The requested additional objective to be added to CDP6.20 may be contrary to the settlement strategy and its inclusion may hinder the proper planning and sustainable development of the County. I am not therefore in favour of its inclusion.

I believe objective CDP 8.49(a) adequately facilitates the sustainable modernisation of agriculture while protection the environment, the national landscape and built heritage.

The Food Industry

Objective CDP 6.21 CDP 8.4 supports the food industry and includes may of the issues requested by the objective below. Therefore, I do not consider it necessary to include an additional objective in this regard.

Chapter 8 Rural Development and Natural resources

Request the addition of 1 line to the strategic aims:

"To maintain and support into the future the County's rural/coastal communities including the traditional family farm;". The strategic aims of Chapter 8 Rural Development and Natural

Resources seek to promote the sustainable development of rural communities however they do not nor should not support one sector of the rural community over the other, and therefore I am not in favour of including the aim as suggested.

I acknowledge the alternatives listed in CDP 8.3 i) are limited and I believe the additional uses suggested being, agri-tech and agri-food, should be included in this objective.

Request amendment to objective CDP8.4:

I do not consider that it is appropriate to include the suggested text in relation to the protection of good quality agricultural lands from large scale development which could be accommodated elsewhere and this may be contrary to the settlement strategy of the plan. See earlier response on Agricultural Development above.

Request amendment to objective CDP8.5:

I believe the ethos of these requested amendments are covered in CDP 6.21 and CDP 8.4

Recreational Routes

Request amendment to objective CDP10.11.

Noted, the Code of Best Practice for National & Regional Greenways was published since the Draft Plan was first released and I believe reference to this document should be now included in the Plan. However I note there is no mention of blue ways in this document.

Countryside Recreation

Request amendment to objective CDP10.12.

I concur that the Plan should support the concept of Leave No Trace in terms of outdoor recreation.

Walking & Cycling

In relation to the West Clare Railway Greenway, I believe CDP11.5 is appropriate as per the Draft Plan. However, in relation to the final route selection please be advised of the following. The Council's Capital Projects Section are managing the project to deliver the Kilrush-Kilkee section of the West Clare Railway Greenway at present. The project has proceeded through an initial stage of public consultation regarding Route Selection. This concluded in October 2021. A detailed appraisal of the options is being undertaken subsequent to the public consultation and the preferred route option will be identified in the forthcoming months.

In relation to the remaining sections of the West Clare Railway Greenway, it is anticipated that the Ennis-Ennistimon section will proceed to Route Selection stage in the near future. Other sections of the Greenway, will proceed through public consultation stages subsequently. It is suggested that matters regarding access to lands should more appropriately be raised within those project consultations.

Reference to the Code of Practice for National & Regional Greenways will be included in CDP 10.11.

Coastal Erosion & Flooding

Request an addition to objective CDP13.11:

River maintenance is separate from Planning Legislation and is governed by the Arterial Drainage Acts amongst others. The OPW is the lead Authority in this regard and accordingly is outside the

scope of the Development Plan.

Green Infrastructure & Climate Change

Request an addition to objective CDP15.30:

Reference to the Code of Practice for National & Regional Greenways will be included in CDP 10.11.

Town & Village Centre Vacancy

Request additions to objective **CDP17.7**:

"*e) Support farm shops in rural areas where it is ancillary to an existing farm complex. d) Facilitate and support sustainable employment initiatives and the development of value-added opportunities linked to food, horticulture and agriculture and also support the development of village shops in villages and small village settlements where the scale of the development is compatible with the rural character of the area. f) Facilitate, support and encourage community-owned and managed shops and local services*"

Chief Executive's Recommendation

1. Include additional text in CDP 8.3 Alternative Farm Enterprises

It is an objective of Clare County Council:

To assist the sustainable development of the rural economy through the facilitation and encouragement of:

i) Alternative farm enterprises, agri-tourism projects ~~and~~*, agri-tech, agri-food, and farm shops;*"

2. Include additional text in CDP 10.11 Recreational Routes

ii) To have regard to the Code of Best Practice for National & Regional Greenways in the development of greenway corridors within the county."

3. Include additional text in CDP 10.12 Countryside Recreational

iii) To support the Leave No Trace Outdoor Ethics Education Programme designed to promote and inspire responsible outdoor recreation through education, research and partnership.

Submission No: S2/753 –Michael Begley	
Relevant Chapters / Topics	• **Volume 1 – Written Statement** • **Rural Housing – Social Need**

Summary of Issues Raised in Submission

This submission related to rural housing, specifically the definition of Social Need.

In the submission it is requested that "Local Rural Person" paragraph 2 of Definitions, page 50, CDP 3.11. Local Rural Person, current CDP 2017-2023, be included in Category B – Social Need (i), with the following change *"who has owned a landholding in a rural area prior to 2005 and who wishes to build on that land".*

Chief Executive's Response

I would like to thank Michael Begley for the submission, and I acknowledge the importance of the point raised in the submission.

The Housing Strategy has been prepared with Project Ireland 2040 National Planning Framework NPO19 and Sustainable Rural Housing Guidelines for Planning Authorities, 2005, which it must align with. The rural housing policy is based on demonstrable social or economic need. The inclusion of the specific text as requested would not be in accordance with the aforementioned and would therefore contravene national and regional policy and would not be in accordance with proper planning and sustainable development.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/754 –Johan Mestach	
Relevant Chapters / Topics	• **Nature based Enterprise**

Summary of Issues Raised in Submission

The submission relates nature-based enterprise in the County.

In the submission, the well-structured layout and comprehensive nature of the Draft Plan is commended as is the opportunity for the public and any interested party participating in the future of Clare County.

In addition, a forthcoming development, an ecological retreat centre, is presented which is considered to fit with aspects of the Draft Plan including rural tourism development, natural heritage, landscape and green infrastructure climate action, renewable energy and environment, social, community and cultural development, and land use zoning. It is considered that this could be used as an example to what is possible and the benefits to the local communities, the County and Country as well as international visitors.

Chief Executive's Response

I would like to thank Johan Mestach for the submission, and I welcome the positive comments regarding the layout and content of the Draft Plan as well as the opportunity for the public to get involved.

I note the comments made in relation to the ecological retreat centre and the potential benefits to the local community and wider area. In this regard, the Draft Plan contains polices and objectives that support such rural enterprises.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/764 –Not Here Not Anywhere	
Relevant Chapters / Topics	• **Climate Change** • **Renewable Energy**

Summary of Issues Raised in Submission

This submission is in relation to the development of new fossil fuel infrastructure and transition to renewable energy systems.

Fossil fuels/Infrastructure

- The Plan should ensure a rapid phasing out of all fossil fuels including gas.
- The Plan should not allow the expansion of the gas grid, as is mentioned in CDP11.46 of the plan.
- The Plan should ban fracked gas in its energy mix.
- Any new large scale fossil fuel infrastructure projects must be mandated to undertake climate impact assessment to ensure they are consistent with Ireland's fair share net cumulative carbon dioxide (CO2) quota in line with the Paris agreement.

Data Centres

- A national cap on the level of data centre demand that can be accommodated by the grid to 2030, while meeting our renewable energy and climate emissions targets consistent with our obligations under the Paris Agreement, must be set out in national policy.
- The new data centre in Clare must be powered entirely by onsite or new off-site renewable energy.
- Existing centres should be required to transition rapidly to onsite or new off-site renewables. Where technically possible, heat generated from a data centre should be utilised for district heating systems.

Public Participation and People-led Policy

- Outside the development of this plan, the council should lead annual local climate dialogues which serve to inform communities about the ongoing transition to a low carbon society and seek their opinions, ideas and consent.
- The Climate Action and Environment office, or equivalent, within the council must be adequately resourced, publicised and staffed. These offices should work closely with local communities to improve education and access to information around environmental issues, proactively engage in consultations and participatory processes which allow local people to have a say in the energy transition in their area.
- Wherever practically possible, participatory processes should be designed in a participatory way, with input from representatives of all groups who are expected to take part.
- Special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation.
- Support and establish community energy projects throughout the lifetime of the county development plan.

Chief Executive's Response

I thank Not Here Not Anywhere for the submission.

Ireland's commitment towards a zero-carbon energy system means we will rapidly move away from fossil fuel use for energy. Under CAP 21 the country has set a target to decarbonise its electricity grid by 80% by 2030, and to reach net-zero carbon emissions by 2051.

The gas grid remains an essential component of our energy infrastructure. Essential maintenance, upgrading and expansion of the electricity and gas network grid infrastructure will likely be required to integrate renewable energy sources, allowing for the creation of a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows.

As outlined within CAP 21, Ireland will work diplomatically to support changes to European law that will restrict the importation of fracked gas, and work to encourage a full phase out of fossil fuel extraction by means of hydraulic fracturing at an international level within the wider context of the phasing out of fossil fuel extraction globally.

Under CAP 21, the government will review the policy context for Large Energy Users, including data centres, to ensure that the sector will be in alignment with sectoral emissions ceiling and support renewable energy targets. Energy demand, including from data centres, will be expected to operate within sectoral emissions ceilings and further signals will be required to locate demand where existing or future electricity grid is available and close to renewable energy generation.

Clare County Council recognise the potential that large energy users and industrial facilities, including data centres, have in relation to providing renewable heat and district heating solutions in Clare and, as per RES Objective 16.1, will seek to require planning applications of large commercial and industrial developments to be accompanied by a feasibility study setting out the potential for incorporating district heating infrastructure into the proposed development and this will apply to data centres.

Clare County Council acknowledge the importance of community participation and ownership in generating public acceptance of Ireland's energy transition. Furthermore, it is an objective of the Council (RES 18.1) to support the expansion of the highly successful SEAI Sustainable Energy Communities Programme within County Clare, growing from 20 Sustainable Energy Communities to 30.

Clare County Council encourages both developers and host communities to engage in meaningful consultation with one another whenever a new energy project is being considered and aims to promote a dynamic process of dialogue between individuals or groups based on a genuine exchange of views that can help influence decisions and programmes of action that deliver the most acceptable outcomes for all parties.

Chief Executive's Recommendation
I recommend no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/767 –Jason Ryan and Ger O'Halloran on behalf of Clare District Soccer League	
Relevant Chapters / Topics	• **3A Ennis MD** • **Recreational** • **Land Use Zoning**

Summary of Issues Raised in Submission

The submission sets out the membership of Clare District Soccer league with 37 clubs with just over 3,200 members in the current 21/22 season.

It is requested that more land to be zoned for recreational use. Only a realignment of appropriate lands can ensure the future of local sporting organisations.

- Currently zoned agricultural lands in the Ennis environs is beyond the financial remit of a voluntary organisation.
- To note that the CDSL would be interested in partnering with Local Authority in developing and sustaining municipal amenities.
- Suggests a joined-up approach on a large-scale sports infrastructure fund application.
- A long-term leasing agreement similar to the one in operation at Fr McNamara Park with Clare Camogie is another option to explore if Council had suitable lands available.

Chief Executive's Response

I wish to thank Jason Ryan and Ger O'Halloran on behalf of Clare District Soccer League and I commend their work in the community. Through this Development Plan process, additional recreational lands have been zoned in Ennis to allow for additional playing pitches at headquarters of the Clare District Soccer League (CDSL) at Frank Healy Park at Ballaghboy, Doora(S2-932).

The Development Plan process endeavors to provide sufficient recreational lands across the County to address the needs of the County. While the Development Plan can identify suitable lands it is largely up to the clubs to develop and finance such facilities, however I note CDSL interest in partnering with the Local Authority should such an opportunity arise in the future.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/774 –Shannon Town Centre	
Relevant Chapters / Topics	• **Shannon**

Summary of Issues Raised in Submission

This submission relates to Shannon Town Centre (STC) and the wider town centre.

Written Statement – Volume 1

- Objective CDP2.16 Community Energy c) commits to exploring the potential of designating STC as a "Sustainable Energy Community". Requests more detail on how this designation will be achieved and implemented.
- Objective CDP4.4 b) states a new Shannon and Environs LAP will be prepared and d) to have regard to STC Masterplan. Requests the timeline be set out in this new Shannon LAP.
- Paragraph 7.3.2 suggests that STC Masterplan is being prepared which contradicts Objective 4.4 and 7.5 which suggests the masterplan is in existence. Request that this is resolved in final plan.
- Objective CDP17.3 b) commits to the development of STC Masterplan which again contradicts Objectives 4.4 and 7.5 and requests this is resolved in final plan.
- Requests clarification on how the differences between the non-statutory STC Masterplan and the statutory Shannon LAP will be dealt with in its decision making under planning legislation.

Maps – Volume 2

- It is noted there are no detailed zoning objectives for STC and assumes this will be contained in forthcoming Shannon LAP. Request that this is confirmed in final plan.

Shannon MD – Volume 3b

- Requests clarification on how the differences between the non-statutory STC Masterplan and the statutory Shannon LAP will be dealt with in its decision making under planning legislation.
- Believes that the Masterplan will be extremely difficult to implement as the implications of the proposals have not been thought through properly.
- Therefore, there will not be a clear pathway to implementation which is essential to the mobilization of stakeholders necessary for sustainable development.

Chief Executive's Response

I wish to thank Shannon Town Centre for their submission and I wish to respond as follows.

I would like to clarify that the Shannon Town center master plan has recently been completed. This is a non-statutory plan which will inform the Shannon Town and Environs Local Area Plan. It is my intention that the Shannon Town and Environs Local Area Plan making process will commence in the coming months and there will be an opportunity for the public to participate in same. The potential of designating STC as a "Sustainable Energy Community" will be explored further in the LAP making process.

I would like to confirm that the Shannon Town and Environs Local Area Plan will incorporate a detailed zoning and settlement strategy for the town of Shannon.

The Planning and Development Act 2000 as amended sets out a requirement for the preparation of a LAP for towns such as Shannon with a population of greater than 5,000 people. The Shannon Town Centre Masterplan is a non-statutory plan and consequently does not carry any legal standing.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/781 –Doolin Community Council	
Relevant Chapters / Topics	• **Doolin** • **Transportation** • **Waste management** • **Water Supply** • **Leisure Facilities** • **Tourism**

Summary of Issues Raised in Submission

The submission makes a number of points/requests in relation to Doolin.

Doolin Settlement Plan

Supports the general objectives as set out in the Plan with some suggested amendments.

1. To amend the objective "To support the development of an integrated Traffic Management Plan for the overall settlement and pier, including a review of speed limits in the village and signage."
   To manage and organise with the various stakeholders, led by the local community, the development of an integrated Traffic Management Plan for the overall settlement and pier, including a review of speed limits in the village and road signage.
2. To amend the objective "To support the provision of infrastructure and services to allow for future growth including the provision of additional car parking facilities and litter management facilities" to say:
   To provide infrastructure and services to allow for future growth including the provision of additional car parking facilities, where necessary, and specific litter management facilities, including compacting bins at population centres.
3. To amend the objective "To improve vehicular and pedestrian access to Doolin Pier and maximise the opportunities for tourism and economic development provided by the pier." to say:
   To improve vehicular and pedestrian access to Doolin Pier and maximise the opportunities for tourism and economic development provided by the pier while enabling residents and visitors to make use of the vital leisure facilities provided by the old pier and beach area. There should be no additional retail development at the pier area to ensure the continuance and expansion of a village centred retail offering.
4. To amend the objective "To facilitate the development of a visitor services building in the vicinity of Doolin Pier" to say:
   To facilitate the development of a visitor services building in the vicinity of Doolin Pier to include ticket offices, toilets and canteen as well as facilities such as lockers and storage facilities for the use of surfers, divers, kayakers and other leisure users.
5. Notes the need for the provision of 'lighted footpaths' in the village to better integrate communities and enable children to walk safely to school.
6. Under sub-heading "Tourism" to amend the objective "To strongly support the development of Doolin in association with Lisdoonvarna, to assist in collaborative projects

and the sharing of assets and strengths including developing its economic and tourism potential as a stopping point on the Wild Atlantic Way." to say:

To strongly support the development of Doolin in association with Lisdoonvarna, to assist in collaborative projects and the sharing of assets and strengths including developing its economic and tourism potential as a stopping point on the Wild Atlantic Way. In particular the Council will make an Engineering feasibility study of the possible extension of the Lisdoonvarna Waste Water Treatment facility to cover the Doolin area in collaboration with the local community. If said feasibility study is positive the Council will work with the local communities to identify financing models for its implementation.

Roads and Transport

1. There is a need for an integrated Traffic Management Plan with that being developed for Cliffs of Moher Centre and should be comprehensive within Geopark area.
2. There is a need for a review of signage especially safety signage for visiting walkers/drivers.
3. There is a need for a review of speed limits in the village. 30kph limits should be introduced in Fisherstreet and Roadford and around the school.
4. Village was built on high quality low volume tourism. With Covid-19 it highlighted the importance of diversifying the tourism mix.
5. The growth in traffic from tour coaches has caused problems on narrow roads and bridges, identifies possible solutions including changes to Day-Tour licensing system (with the NRA) and "stop points" (Clare County Council) and review of weight restriction and speed limits on local roads, and need for the community to have a formal input.
6. The Plan should encourage small to medium conference/seminar business to make use of facilities especially in low season.
7. The implementation of parking bye-laws for areas under traffic pressure in village.
8. There is a need for EV charging points including in tourist areas such as Doolin,, to provide EV charging points whereby every business and accommodation provider would provide at least 1 charge point per 3 bedrooms. And a charging point for every domestic house.
9. There is no designated bus stop for the village. Request an objective to work with Bus Eireann to identify and provide a suitable designated bus shelter.

Environment and Litter Management

There is a need for suitable measures for the proper disposal of litter. Propose that Council provide a number of PEL Solar Powered Compacting bins in area between Roadford and Doolin Pier. Would suggest these specific bins to prevent household rubbish being put in. In addition, to have a person in attendance during high season for litter management.

Water Supply

Notes the current Plan references the constraints of Ennistymon Water Supply and requests that the new development plan address water pressure issues in the village.

Leisure Facilities

1. One of the most successful tourist products in recent years had been the upgrading of the Liscannor-Cliffs of Moher-Doolin Cliff Trail. While some of this has been upgraded by the CLDC, the remainder has not. Request the Council work with CLDC to upgrade this trail.
2. There are parking issues for walkers using the Cliff Walking Trail and need to complete the footpath from Fitz Cross to the Community Centre to solve this issue.

3. Building on the success of the Cliff Trail there should be a number of loop walks/ cycle routes starting around the village. A riverside walking trail could be developed between Fisherstreet and Roadford along the Aille river and there are a number of bog roads. Requests the Council consider this and also raise awareness of the many heritage sites around the area.
4. At the old pier there is a natural facility for people to enjoy sea swimming and sea sports and has been categorised a leisure facility and should continue as such.
5. The slipway beside the old pier should receive basic maintenance to make it user friendly.
6. The provision of storage facilities for leisure users e.g. surfers, divers, kayakers and other leisure users at Doolin Pier as part of the Council's planned facilities and should accommodate visitors and locals wishing to use the area.
7. Car parking charges are a factor for the local resident's use of the pier area and parking bye-laws should make provision for short term parking for residents.
8. Under current parking bye-laws there is no parking charges for coaches at the pier. Not only should they be charged but should have limits where there are no more than six coaches at any one time.
9. Considers that any reference to development of Doolin Pier, contained in the Plan, should take into account the views of the local community.

Chief Executive's Response

I would like to thank Doolin Community Council for the submission which relates to Doolin and I wish to respond as follows.

Doolin Settlement Plan

I welcome the support for the general objectives as set out in the Plan.

1. It is an integral part of the preparation and implementation of a Traffic Management Plan to consult with all stakeholders including the local community, therefore I do not consider it is necessary to amend the objective as requested in the submission.
2. I am satisfied that the objective contained in the Doolin Settlement Plan is appropriate and provides for the provision of compacting bins at appropriate locations.
3. A noted under Section 19.2 Nature of Zonings, in Chapter 19 of Volume 1 of the Draft Plan, the use of land for maritime/harbour related activity includes the use of land, including harbours and piers, that will facilitate small-scale, water-based commercial or tourism activity and associated facilities including carparking facilities. In relation to water-based commercial or tourism activity uses, these may include an element of retail activity as part of the overall function. However, any proposed retail would be assessed having regard to any potential negative impacts on village centre retailing and would have to comply with the sequential test which promotes the vitality and viability of town and village centres over edge of town or out of town sites. Therefore, I do not consider it is appropriate to amend the objective as requested in the submission.
4. While I acknowledge the needs of surfers, divers, kayakers and other leisure users in the area, the provision of such facilities as part of the development of the Visitor Services Building or any other such development is not within the scope of the county development

plan. Therefore, I do not consider it is appropriate to amend the objective as requested in the submission.

5. I note the comments in relation to the provision of 'lighted footpaths' in the village, in this regard the Doolin Settlement Plan includes a general objective to support increased connectivity in the village including increased pedestrian permeability through the development of a public footpath and public lighting scheme linking Roadford to Fisher Street, and Fitz's Cross to Coogyulla Cross, as well as Doolin Pier.
6. Responsibility for the delivery of wastewater infrastructure in any settlement, including Doolin, lies with Irish Water, including the development of any feasibility studies for same. Therefore, I do not consider it is appropriate to amend the objective as requested in the submission.

Roads and Transport

1. Consideration of the impacts of traffic in the wider area, including from Cliffs of Moher Centre and Geopark will be considered In the preparation and implementation of an integrated Traffic Management Plan, therefore I do not consider it is necessary to amend the objective as requested in the submission.
2. It is envisaged that a review of signage in the village will be carried out as part of an integrated Traffic Management Plan as identified in the Doolin Settlement Plan.
3. It is envisaged that a review of speed limits in the village will be carried out as part of an integrated Traffic Management Plan as identified in the Doolin Settlement Plan.
4. I note the comments made in the submission in relation to the importance of diversifying the tourism mix. In this regard, the Doolin Settlement Plan contains a general objective to provide for the further development of a diverse tourism product which supports the year-round tourism activity and enhances employment and economic activity.
5. Under the Public Transport Regulation Act 2009 (PTR Act 2009), the National Transport Authority is responsible for the licensing public bus passenger services including commercial tour buses. The provision of such licences is carried out in consultation with the Council and will continue to be monitored by the Council through this process. In addition, it should be noted that the review and operation of parking bye-laws, and speed limit designations do not come within the scope of the County Development Plan.
6. In relation to encouraging small to medium conference/seminar business to make use of facilities especially in low season, the Doolin Settlement Plan includes a general objective to provide for the further development of a diverse tourism product which supports the year-round tourism activity and enhances employment and economic activity. In addition, 9.2.8 Business Tourism notes the further development of the conference and event market is a focus of the County Clare Tourism Strategy 2030 and contains Objective CDP9.7(a) "To promote, encourage and facilitate the provision of new conference facilities and the expansion/upgrade of existing conference facilities throughout the County at appropriate locations and in full compliance with all relevant environmental legislation in particular the requirements of the Habitats Directive."
7. As noted above, the development and operation of parking bye-laws do not come within the scope of the County Development Plan.
8. I acknowledge the points made in the submission in relation to the increasing need for high quality electric vehicle parking, both for residents, shoppers, workers and visitors. As noted in Section 11.2.8, Chapter 11 of Volume 1, of the Draft Plan, the Government's *Climate Action Plan* aims to develop the EV charging network necessary to support the

growth of electric vehicles (EV's) to at least 800,000 by 2030 and sets a target for the supply of infrastructure to stay sufficiently ahead of demand. It sets out its intention to develop and implement planning rules and guidelines across residential and non-residential parking locations for EV charging infrastructure. Section 11.2.8 EV and CNG Infrastructure and Smart Mobility of the Draft Plan and its associated Objective CDP11.10 support investment in the sustainable development of Electric Vehicle charging facilities and requires the inclusion of electric vehicle charging point infrastructure within residential, commercial and mixed-use developments in accordance with the standards set out in Appendix 1 Development Management Guidelines. The standards set out in Appendix 1 includes the requirement that all new developments should provide facilities for the charging of battery-operated cars at a rate of up to 20% of the total car parking spaces, the provision of at least one car parking space equipped with an EV charging point for every five car parking spaces being provided for the associated development and requires that Rapid Charge Points should be provided within centres of commercial activity. Having regard to the above, I am satisfied that the issue raised is dealt with appropriately in the Draft Plan.

9. I agree that infrastructure such as bus stops are very important to supporting the use of public transport and I am satisfied that this is addressed in Objective CDP11.8 Bus Services.

<u>Environment and Litter Management</u>

I am satisfied that the objective contained in the Doolin Settlement Plan, to support the provision of infrastructure and services to allow for future growth including the provision of litter management facilities, is appropriate and provides for the provision of solar powered compacting bins at appropriate locations in the village. The operation of litter management services is the responsibility of the Environment Section of Clare County Council. The operation of associated services is not within the scope of the county development plan.

<u>Water Supply</u>

Notes the current Plan references the constraints of Ennistymon Water Supply and requests that the new development plan address water pressure issues in the village.

<u>Leisure Facilities</u>

1. While I note the points made in the submission, however, the upgrading of walking trails in the county, including portions of the Liscannor-Cliffs of Moher-Doolin Cliff Trail, is not within the scope of the county development plan.
2. I note the comments in relation to the need to complete the footpath from Fitz Cross to the Community Centre and in this regard the Doolin Settlement Plan includes a general objective to support increased connectivity in the village including increased pedestrian permeability through the development of a public footpath and public lighting scheme linking Roadford to Fisher Street, and Fitz's Cross to Coogyulla Cross, as well as Doolin Pier.
3. I note the comments in relation to the provision of looped walks/cycle routes in the village as well as the need to raise awareness of the many heritage sites around the area. In this regard, the text under Transport, Active Travel and Connectivity in the Doolin Settlement Plan notes there are opportunities to develop looped walks around the village which showcase the spectacular scenery and historic heritage of the area, including medieval castles and churches, standing stones, ring barrows, a court tomb, stone forts, ice age remains and a stone age 'flint factory'. There is also an opportunity to provide a riverside walking trail (with the agreement of landowners) between Fisher Street and Roadford

along the Aille River, and to develop nature walks along a number of local bog roads. In addition, an objective is included in this section to support the development of walking trails in the area including looped walks around the village, a riverside walk along the Aille River and nature walks along local bog roads.

4. The support for the continued use of the old pier for people to enjoy sea swimming and sea sports is noted.
5. I note the concern outlined in the submission in relation to the maintenance of the slipway beside the old pier, however it is not within the scope of the county development plan to address operational issues.
6. In relation to the provision of storage facilities for leisure users e.g. surfers, divers, kayakers and other leisure users at Doolin Pier, the provision of such facilities as part of the development of the Visitor Services Building or any other such development is not within the scope of the county development plan.
7. I note the points made in relation to car parking charges at the pier area, however, the review and operation of parking bye-laws do not come within the scope of the County Development Plan.
8. In relation to parking charges for coaches at the pier. As noted above, the review and operation of parking bye-laws do not come within the scope of the County Development Plan.
9. The county development plan process includes three distinct public consultation periods which provide an opportunity for members of the public, including the community of Doolin, to make submissions throughout the various stages of the plan. This includes the recent public consultation on the Draft Plan on which this submission has been made. All submissions received are duly considered in the making of the county development plan.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/784 –Eoin Gleeson	
Relevant Chapters / Topics	• **Volume 10a** • **Biodiversity** • **Environment**

Summary of Issues Raised in Submission

This submission refers to environmental and biodiversity issues.

Volume 10a Natura Impact Report

In relation to Table 7-1, Section 2 suggests:

- Connectivity mapping of protected areas.
- Determine the feasibility of ecological corridors between protected areas.
- Assess the potential for connectivity through settlements and developments. Include a minimum area in the development for an ecological corridor.
- Wildlife corridors between NHAs and National Parks and Natura 2000 sites. 78 SACs, 20 SPAs included.

Chapter 15 Biodiversity, Natural Heritage & Green Infrastructure.

In relation to Sections 15.2.10, 15.2.11 and 15.2.12 suggests:

- The status of a brownfield or greenfield site must have a minimum area of retained one or more defined habitat/s from Fossitt (2000) that has evolved or occurred there.
- Prevent greenfield or brownfield sites of private or public land to be cleared without granted planning permission.

In relation to Section 15.2.13 suggests:

- Integrate demonstration sites in wider area context.
- Assessment to connect these sites with wider habitats to prevent isolation and habitat fragmentation. As theory presented by E.O. Wilson in Theory of Island Biogeography.

In relation to Section 15.2.16 suggests:

- Do not grant any permission or licences for public or private organisations for monoculture non native tree plantations in any peatland area designated or not.
- This will take an individual EIAR to be completed before a licence shall be granted.

In relation to Section 15.2.17 suggests:

- Increase protected native broadleaf woodlands.
- Assess the connectivity of existing protected pNHAs and NHAs and woodlands.
- Include annual hedgerow mapping, surveying and further protection in relation to management of hedgerows.
- Information and training on hedge laying and management for landowners and developers.
- Increase Tree Protection Orders (TPOs) across the county.

Chapter 11 Physical Infrastructure, Environment and Energy

In relation to 11.6.3 would suggest:

- To complete a study on the LED light penetration in public street lighting in urban areas affecting circadian rhythm and phenology of birds in urban areas.
- LED lighting may be adding an additional pressure on urban ecology and wildlife.

Chief Executive's Response

I wish to thank Eoin Gleeson for the submission and respond as follows:

Volume 10a Natura Impact Report

In relation to:

- Connectivity mapping of protected areas;
- Determining the feasibility of ecological corridors between protected areas;
- Assessing the potential for connectivity through settlements and developments and including a minimum area in a development for an ecological corridor, and
- Wildlife corridors between NHAs and National Parks and Natura 2000 sites,

I wish to respond as follows:

Through a co-ordinated effort between the Council's SEA/AA Environmental team and the Forward Planning section, a total of 511.1 hectares has been zoned as Buffer space which will provide for Climate Change and Biodiversity in line with the Climate Change Action Plan and the National Biodiversity Action Plan.

The identification of these buffer areas centered largely around the riparian zones of our many surface waters, in line with the updated IFI guidance 'Planning for Watercourses in the Urban Environment – a Guide to the Protection of Watercourses', and through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate/Flood risk and Recreational Planning.

The draft County Development Plan has integrated the protection of these invaluable riparian zones in line with the guidance which act as ecological corridors and wildlife networks. In addition, through the integration of the environmental assessments, zoning has either been amended, modified or excluded based on the importance of the surrounding habitats and in order to meet obligations under Article 10 of the Habitats Directive. The focus in terms of zoning these buffer spaces and open spaces together with removing areas of zoning was predominantly to allow for connectivity across the landscape. I do not propose to amend the draft CDP on this issue.

Chapter 15 Biodiversity, Natural Heritage & Green Infrastructure.

In relation to Sections 15.2.10, 15.2.11 and 15.2.12 and the request that:

- The status of a brownfield or greenfield site must have a minimum area of retained one or more defined habitat/s from Fossitt (2000) that has evolved or occurred there;
- Prevent greenfield or brownfield sites of private or public land to be cleared without granted planning permission,

I wish to respond as follows:

Any brownfield or greenfield site where a planning application is submitted to the planning authority for permission will be subject to, at minimum, an ecological assessment to assess the presence or absence of defined habitats across the site. The development of greenfield or brownfield sites is covered by CDP Objective 6.15. In addition, depending on the scale of the proposed development, any reclamation of such a site will be subject to Environmental Impact Assessment in accordance with CDP Objective 15.10. I do not propose to amend the draft CDP on this issue.

In relation to Section 15.2.13 and the request to:

- Integrate demonstration sites in wider area context, and
- Undertake assessment to connect these sites with wider habitats to prevent isolation and habitat fragmentation, in accordance with theory presented by E.O. Wilson in Theory of Island Biogeography,

I wish to respond as follows:

The demonstration sites selected are predominantly located in urban areas where the sites were lacking biodiversity or conservation value. It is hoped that following the implementation of the recommendations as outlined for each of these sites it will lead to an increase in biodiversity and the provision of habitats which will benefit these areas. Once implemented the Clare Biodiversity Action Plan will consider the integration of these sites to prevent isolation. Habitat fragmentation is not an issue as the demonstration sites will look to create new and additional areas of biodiversity value which can act as habitats for many species. I do not propose to amend the draft CDP on this issue.

In relation to Section 15.2.16 and the request to:

- not grant any permission or licences to public or private organisations for monoculture non-native tree plantations in any peatland area whether the area is designated or not, and that such plantations require an individual EIAR to be completed before a licence shall be granted,

I wish to respond as follows:

Clare County Council has no remit in terms of licencing for monoculture non-native tree plantations across the county. Where applications for planning permission arise in terms of access to sites or road alterations, or where a licence is referred to the Local Authority for comment, CDP Objective 15.18 will apply in terms of providing protection and enhancement to the valuable peatland resource in County Clare including protecting the heritage and environmental value of these peatland areas. In addition, should such an application be of a scale or nature that requires the preparation of an EIAR then CDP Objective 15.10 will apply with the application subject to Environmental Impact Assessment. I do not propose to amend the draft CDP on this issue.

In relation to Section 15.2.17 and the request to:

- Increase protected native broadleaf woodlands;
- Assess the connectivity of existing protected pNHAs and NHAs and woodlands;
- Include annual hedgerow mapping, surveying and further protection in relation to management of hedgerows;

- Provide information and training on hedge laying and management for landowners and developers;
- Increase Tree Protection Orders (TPOs) across the county,

I wish to respond as follows:

CDP Objective 15.19 'Woodlands, Trees and Hedgerows sufficiently addresses the points raised in relation to Woodlands, Trees and Hedgerows in particular sub-section

> d) To work with landowners, local communities and other relevant groups to promote the retention and conservation of existing trees and hedgerows and encourage development proposals that enhance the landscape through positive management and additional planting/sensitive replanting of native tree species;
>
> e) To protect woodlands and hedgerows from damage and/or degradation and to prevent disruption of the connectivity of woodlands and hedgerows of the County;
>
> f) To ensure, where required, applications for development include proposals for planting / leave a suitable ecological buffer zone, between the development works and areas/features of ecological importance;

In addition, Clare County Council has prepared a Biodiversity Manual to guide the application of best practice with regard to biodiversity and habitat protection by the Council. This incorporates the management of hedgerows which will be implemented across the council by Local Authority staff. I do not propose to amend the draft CDP on this issue.

Chapter 11 Physical Infrastructure, Environment and Energy

In relation to Section 11.6.3 and the request to:

- To complete a study on the LED light penetration in public street lighting in urban areas affecting circadian rhythm and phenology of birds in urban areas;
- LED lighting may be adding an additional pressure on urban ecology and wildlife.

I wish to respond as follows:

The Road Management Office in Clare County Council has undertaken Screening for Appropriate Assessment with respect to the Public Lighting Energy Efficiency Project for Clare which will see urban lighting changed to LED. This assessment took into consideration the impacts on protected habitats and species. In addition, all planning applications across the county which may have an impact on Bat species given their sensitivity to changes in light levels are required to prepare a Light Spill Model together with an assessment of the impacts on these species. The assessment is carried out in accordance with:

- The Bat Conservation Ireland Guidance on Bats and Lighting;
- The Bat Conservation Trust & the Institute of Lighting Professionals publication 'Bats and Artificial Lighting in the UK' Guidance Note 08/18.

LED lighting may be adding an additional pressure on urban ecology and wildlife and in this context during the lifetime of the Plan a study on the LED light penetration in public street lighting in urban areas may be addressed. However, I do not propose to amend the draft CDP on this issue.

Chief Executive's Recommendation
I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/789 –Andrew Hersey (Clarefield)	
Relevant Chapters / Topics	• **Biodiversity** • **Car Parking**

Summary of Issues Raised in Submission

This submission relates to tree preservation around Mountpleasant House, Clarefield and car parking standards. A map has been included with this submission.

There are a group of trees located on grounds of Mountpleasant House which are unique stands of mature deciduous trees in Loop Head and provide a microclimate in the area. Therefore, it is suggested that these trees be designated as trees for preservation.

Refers to car parking standards set out in Table A3. To allow for denser developments in town centres parking standards need to be relaxed. 1 space for a 2 bed unit and 2 spaces for a 3 bed unit is all but impossible in a town centre brownfield site.

Car parking standards for retail is 5-7 spaces per 100sqmin a town centre which is onerous on a retailer. With click and collect shopping and home delivery it just requires a few car parking spaces. With respect of same therefore large retail centres to not require significant levels of parking.

Chief Executive's Response

I thank Andrew Hersey for his submission.

The submission proposes the inclusion of a group of trees in the vicinity of Mountpleasant House, Clarefield within the "Trees for Preservation" designation. I note having reviewed the historic 6 inch maps from c.1840 that the area was heavily wooded when first inhabited and access by sea was likely to have been very important. There are numerous ring forts and other monuments scattered all around this area dating from the first centuries. In line with CDP Objective 15.19 sub section c which states "c) To protect individual or groups of trees within the Plan area which are important for environmental, recreational, historical, biodiversity and/or aesthetic reasons or by reason of contribution to sense of place, including groups of trees which correspond with protected habitats, or which support protected species, under the Habitats Directive;" and d which states - "d) To work with landowners, local communities and other relevant groups to promote the retention and conservation of existing trees and hedgerows and encourage development proposals that enhance the landscape through positive management and additional planting/sensitive replanting of native tree species;" the stands of trees as outlined in the submission relating to Mountpleasant House in Clarefield are included in the associated GIS layer "Trees for Preservation" as outlined in the County Development Plan.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/797 –Irish Traveller Movement	
Relevant Chapters / Topics	• **Traveller Accommodation** • **Volume 8 Clare Housing Strategy**

Summary of Issues Raised in Submission

This submission relates to Traveller accommodation and raises the following points:

Traveller Accommodation

This submission gives some background to the Irish Traveller Movement and supports all the recommendations made by Clare Traveller Community Development Project in their submission on Draft plan including need for engagement and consultation including the need for a clear focus on accommodation needs associated with traveller culture, and the potential for the upcoming midterm review process of the Traveller Accommodation Programme (TAP) to identify any shortcomings with subsequent amendments to be included in the final development plan. The submission refers to the Office of the Planning Regulator's Case Study Paper *Traveller Accommodation and the Local Development Plan* which should inform how Traveller accommodation is planned in the development plan.

Recommendations for the County Development Plan

1. The current draft housing strategy, on p.14, and in PO10, refers to Traveller housing, this should be amended to accommodation, to capture the range of accommodation, including trailer or mobile accommodation.
2. National-level planning guidelines require that the range, type of housing required, and the land use aspects of the TAP are incorporated into the Development Plan including identification of additional locations for Traveller accommodation projects. In this regard, zoning policies should also be drawn up in a flexible manner to reflect the urgent need to secure additional Traveller accommodation over the lifetime of the plan. Considers projects under the 2019-2024 Traveller Accommodation Programme should be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10). In addition, sites should be identified and zoning of land for Traveller specific accommodation, including transient accommodation, should be mapped and illustrated in the plan. Given the lifespan of the development plan, consideration should also be given for how sites will be identified for Traveller Specific Accommodation in the next Traveller Accommodation Programme, including transient sites.
3. A system of monitoring and reviewing at regular intervals and provisions outlined should be included in the Development Plan. These and the provisions of the current Traveller Accommodation Programme should be reviewed every six months with a presentation on progress to the Local Traveller Accommodation Consultative Committee.
4. Sites identified for Traveller specific accommodation should be well located, close to key amenities, and chosen in consultation with the community. Plans should include sufficient green areas and children's play areas.
5. All developments should be carried out with consultation at every stage of the process,

with prospective residents, local Traveller organisations and with the Local Traveller Accommodation Consultative Committee.

6. The Development Plan should identify Travellers as a priority group in its plans to address homelessness and identify what steps will be taken to reduce the overrepresentation of Travellers in homeless figures.
7. The Development Plan should reference the Council's strategy to implement the relevant recommendations of the recent Irish Human Rights & Equality Commission Equality Review on the provision of Traveller accommodation in the area.

Eliminating Energy Poverty Traveller Specific Accommodation

1. Notes that a recent study by National Traveller MABS found that Travellers living in mobile homes and trailers experience high levels of energy poverty. Household income is also a factor in energy poverty. Considers the Council should review existing accommodation with a view to bringing it up to the current regulatory standards in terms of energy efficiency and in terms of access to sustainable energy sources. It should be ensured that there is access to the competitive energy provision market for Travellers living in Traveller-specific accommodation.
2. All planned Traveller specific accommodation should seek to ensure that homes built have the highest level of building airtightness combined with effective ventilation systems. Notes the Council must meet near zero energy building (NZEB) requirements under current regulatory requirements and demonstrate that energy used by the NZEB must be from renewable sources "to a very significant extent".

Chief Executive's Response

I would like to thank Irish Traveller Movement for the submission which relates to a number of items as follows:

Traveller Accommodation

The County Development Plan is a statutory plan and public consultation has been carried out in accordance with the requirements of the Planning and Development Act 2000, as amended. In addition, a series of public consultation events have been held throughout the County. There will be a further opportunity to comment on the plan at the next stage in the plan making process.

As noted in Section 5.2.8 Traveller Accommodation, Chapter 5 of the Draft Plan, under the Housing Acts 1966-1997 Local Authorities are responsible for the provision of accommodation, including serviced caravan sites, for the travelling community. The Housing (Traveller Accommodation) Act (1998) places a statutory obligation on Clare County Council to prepare and adopt a Traveller Accommodation Programme, subject to periodic review, which meets the existing and projected needs of the Traveller community in the County. The current programme is the Clare County Council Traveller Accommodation Programme 2019-2024. The Draft Plan also contains Objective CDP 2.10 to provide appropriate housing accommodation for the Traveller Community in accordance with the Clare County Council Traveller Accommodation Programme 2019-2024, and any subsequent programme adopted by the Council. This would include any updates following the forthcoming midterm review.

I note the reference to the Office of the Planning Regulator (OPR) guidance, and I am satisfied that the Draft Plan has been prepared in accordance with relevant national and regional policy and guidance. In this regard, the OPR, in their submission on the Draft Plan (S2-014), notes that Section 5.2 of the draft Plan includes relevant policies from the housing strategy addressing specialised housing requirements, including those of the Traveller community (Objective CDP5.10), and the OPR welcome the commitment to provide appropriate housing accommodation for the Traveller Community in accordance with the Clare County Traveller Accommodation Programme 2019-2024 (TAP), and to the addressing of Traveller Accommodation in the Housing Strategy.

Recommendations for the County Development Plan

1. I consider the request to amend the references to Traveller 'housing' to Traveller 'accommodation' in the draft housing strategy is appropriate.
2. In recognition of the specific requirements to provide accommodation for the Traveller community and the responsibility of the local authority for the provision of accommodation, including serviced sites, the Council has a current Traveller Accommodation Programme (TAP) 2019-2024 and it is an objective (CDP5.10) to provide appropriate housing in accordance with the TAP. The current TAP does not have a spatial element to inform any inclusion on the land-use zoning maps of the draft plan and it is not the intention of the Planning Authority to identify sites as it is considered inappropriate until such time as the TAP introduces the spatial identification of sites. Any spatial element included in a future TAP will be incorporated into the Development Plan as appropriate at a later stage. In relation to zoned lands within the County, the Indicative Land Use Zoning Matrix in Appendix 2 of the Draft Plan identifies Traveller Accommodation as being open for consideration on a variety of land uses including Mixed Use, Existing Residential, Residential, Low Density Residential, Community and Agriculture.
3. The implementation and monitoring framework for the Plan is set out in Appendix 9. As noted in Chapter 20 Implementation and Monitoring, the framework categorises key Objectives included in the Draft Plan, including CDP5.10 Traveller Accommodation, in terms of their contribution towards the achievement of the Strategic Development Plan Principles. The Objectives are assessed in terms of means of implementation and key performance indicators to monitor and evaluate the delivery of the Objective. As noted in Section 20.2 Plan Evaluating and Reporting, the framework will assist the Planning Authority in meeting its statutory reporting requirements including the 2 Year Progress Report of the County Development Plan (as required under Section 15(2) of the Planning and Development Act 2000, as amended. This is a full report on the implementation of the objectives of the Plan and will be prepared two years after the Plan comes into effect. This report will highlight any difficulties that may arise in the achievement of the objectives and give an opportunity to rectify any problems that may be identified.
4. I note the points made in relation to the identification of sites for Traveller specific accommodation.
5. I note the points made in relation to the requirement for consultation with prospective residents, local Traveller organisations and the Local Traveller Accommodation

Consultative Committee in the delivery of developments.

6. It is the role of the County Development Plan to support and facilitate the delivery of accommodation, including Traveller accommodation, and to promote programmes such as the Traveller Accommodation Programme and the Homeless Action Programme. However, responsibility for the preparation and delivery of such programmes does not lie within the scope of the County Development Plan. Any amendments to such programmes will be reflected in the County Development Plan at an appropriate time.
7. The Development Plan should reference the Council's strategy to implement the relevant recommendations of the recent Irish Human Rights & Equality Commission Equality Review on the provision of Traveller accommodation in the area. Noted, any forthcoming strategy will be reflected in the County Development Plan as appropriate.

Eliminating Energy Poverty Traveller Specific Accommodation

1. I note the recent study by National Traveller MABS and the need to review existing accommodation with a view to bringing it up to the current regulatory standards.
2. I note the points made in the submission in relation to energy efficiency in all planned Traveller specific accommodation as well as NZEB requirements under current regulations. CDP2.14 Transition to a Low Carbon Economy and Society expresses the Council's commitment to climate/carbon proofing existing public buildings "k) To support investments in the energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B';" and "l) To report annually on energy usage in all public buildings and to achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP)."

Chief Executive's Recommendation

I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029/Volume 8 Clare Housing Strategy:

<u>2.3.5 Clare County Council Traveller Accommodation Programme 2019-2024 – amend the first sentence to read:</u>

Under Objective 4.9 of the Clare County Development Plan 2017-2023, as varied, Clare County Council aims to provide appropriate ~~housing~~ accommodation for the Traveller Community.

<u>PO10 under 6.2 Policy objectives for the Clare County Housing Strategy 2023-2029 – amend wording to read:</u>

PO10 To support the provision of ~~housing~~ accommodation suited to the needs of the Travelling community and to implement the Clare County Council Traveller Accommodation Programme 2019-2024 and subsequent updates.

Submission No: S2/823 –Eugene O'Brien	
Relevant Chapters / Topics	• **Wind Energy** • **Shannon Municipal District**

Summary of Issues Raised in Submission

This submission relates to the development of wind farms at Ballycannon North, Meelick.

- This area is not suitable for a wind farm as it is densely populated with over 1000 homes within 1km of site.
- Development will destroy the habitats including the hen harrier.
- Development works would cause disruption to the community due to narrow roads and with a quarry operating in that area.
- The development would have an impact on the community with the generation of noise and flicker of the blades.
- Offshore Wind energy should be the way forward.

Chief Executive's Response

I thank Eugene O'Brien for his submission.

It is not within the remit of the Draft Renewable Energy Strategy or draft County Development Plan to comment on individual planning applications. The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level strategic mapping for the County and is not intended to provide the same degree of accuracy or detail as the research expected for a site-specific project, and therefore comment on the specific merits/characteristics of an individual site, for example in relation to proximity to housing, or in relation to ecological sensitivity, is beyond the scope of the draft RES.

I acknowledge the concerns over potential landslides and aviation safety associated with windfarm development. The development management process requires the highest standards of community and environmental protection. General safeguards on amenity and environmental protection are included in Section 17 of the draft RES.

The draft Plan also includes objectives CDP 3.1 Appropriate Assessment (AA), Strategic Environmental Assessment (SEA) and Strategic Flood Risk Assessment (SFRA) and CDP 11.47 Renewable Energy which outline the requirement for the draft CDP and associated supporting volumes (including Volume 5, Clare Renewable Energy Strategy) to comply with all relevant EU Directives including the Habitats Directive, Birds Directive and the Water Framework Directive and all relevant transposing national legislation. Furthermore, it is an objective of Clare County Council to support the sustainable development of renewable wind energy at appropriate locations, and in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment, and protected habitats and species, and to assess proposals having regard to the associated SEA and AA.

The landscape, topography and wind energy resource in this part of Ireland makes wind farm

development a sensible approach for the county. In recognition of the climate and biodiversity crises currently facing Ireland and global populations, private sector investment is critical to achieving the ambitious targets set forth. Clare County Council seek to create an environment which encourages collaboration between private companies, public sector, education sector and local communities which will promote research, development and innovation, and which will create new opportunities for the people of Clare whilst supporting a just transition to a net-zero emissions environment.

Off-shore wind energy is recognised as a significant renewable energy source which will become increasingly prevalent in the years to come and will form part of a new County Wind Energy Strategy. In the draft Plan and the RES there is a commitment through policy support to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, upon the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 20203-2029 on the basis of this submission.

Submission No: S2/830 –Clare Women's Network	
Relevant Chapters / Topics	• **Sustainable Development Goals** • **Chapter 1 Socio Economic Rights and Anti- Poverty** • **Chapter 2 Climate Action** • **Chapter 5 Housing & Housing Strategy** • **Chapter 10 Sustainable Communities** • **Chapter 18 Design and Placemaking** • **Enterprise/Tourism**

Summary of Issues Raised in Submission

The submission includes general information on Clare Women's Network. The following items are referenced in the submission:

<u>The Sustainable Development Goals</u>

Considers that these Goals are inextricably linked in achieving social inclusion aims and should be referenced and integrated throughout the Plan.

<u>Chapter 1 Socio Economic Rights and Anti- Poverty</u>

Request Section 1.5 under the heading 'A vision for County Clare' is amended to include a statement committing the Local Authority to 'A County that is committed to **reducing poverty and deprivation** within its population through all its actions and strategies and through proactive collaboration with other organisations in the county'.

<u>Chapter 2 Climate Action</u>

Welcomes the inclusion of a chapter on climate action although considers the aspirations of the chapter are contradicted by other actions and proposals within the Draft CDP which should be addressed before adoption of the plan as follows:

1. Notes a lack of consideration in the chapter regarding how actions impact the lives of marginalised communities and those facing exclusion and/or poverty, in particular the Draft Plan does not include measures around infrastructure and service provision, economic developments which will address issues such as current severe increases in energy costs, severe water pollution, farming, forestry and untreated sewage, poor air quality, access to medical services and hospitals.
2. Notes Section *2.1 Strategic Aims* makes no reference to climate/carbon proofing existing buildings including local authority housing that need significant investment to bring to a suitable standard.
3. Recommends the inclusion of social inclusion representatives on the Adaptation Steering Committee outlined in *2.6.1 Local Adaptation and Business Operations.*
4. Recommends that the Smarter Travel document mentioned in *2.6.2 Infrastructure and the Built Environment* which is currently under review is applied to Clare in a way that promotes universal access to public transport.

5. Recommends that Clare County Council adopt a living wage policy and that all economic development, businesses and projects which are supported in any way by the Local Authority must have as a requirement that employees of all ages are paid the living wage in any given year.
6. Recommends the insertion of 2.10 Climate Justice which will commit to protecting marginalised communities by;
    - providing enough good quality affordable housing.
    - facilitating the development of renewable energy to cushion energy price fluctuations and to employ local people in areas that have historic under/ seasonal employment.
    - ensuring that climate adaptation/mitigations actions do not further marginalise communities and prevent participation.
    - removing financial barriers that prevent retrofitting homes that require it, especially in rural communities.
    - targeting recruitment for renewable energy apprenticeships towards socio-economic communities with few employment opportunities.

Chapter 5 Housing Strategy - Women in Homelessness

Notes 300% increase in number of homeless families since November 2014, driven primarily by structural economic factors and domestic violence, yet women residing in emergency domestic violence refuges are not counted in the monthly homelessness figures. Considers that the draft plan in its written statement and housing strategy severely underestimates current and projected housing need in the County and considers that the housing strategy for this Draft County Development Plan to be in adequate to meet the projected housing needs in the county. While the constraints posed by national policy is recognized, the following actions are proposed:

1. That in advance of adoption of this County Development Plan that Clare County Council engage with national government and seek an increase in their housing supply targets of at least 1500 units to allow for growth, relocation, migration and addressing the housing needs of those on the housing waiting list.
2. That Clare County Council use this current County Development Plan to really take on dereliction in the county and to seek resources, funding, staff, and community support to develop an extensive programme under the Town Centre First Policy that brings 1000 dwellings back into use.
3. That it maintains a comprehensive vacant sites and vacant properties register. That all penalties and taxes relating to these are collected in a timely and proactive fashion.
4. That Clare County Council where necessary looks at purchasing derelict town centre properties, if necessary, by using its compulsory purchase powers when it is in the benefit of the wider community.
5. That Clare County Council collaborate with Training and Educational Institutes in the county to ensure that a skilled work force of tradespeople, retrofitters and builders are available in the County. Clare County Council currently only hosts 3 apprentices, and this figure could be greatly expanded.

6. Clare County Council should work with approved housing bodies including CENA to develop high quality sustainable energy efficient homes for the population including all demographics.
7. Considers it a missed opportunity that the Housing Strategy consultants did not consult with the community. Also considers projections are unreflective of reality and should be corrected in advance of adoption of this plan e.g. house and rent price increases and that basing estimates for income growth for the population of Clare on national GDP growth is an unsound basis for making any projections for affordability of future housing.

Section 5.2.10 Housing for People with Disabilities

Recommends that universal access to public transport is integral to the provision of housing as per *5.2.10 Housing for People with Disabilities to* ensure full participation in employment, healthcare and leisure activities as described in the UNCRPD (Article 19).

Section 5.2.4 Emergency Accommodation

Considers this section must acknowledge those experiencing homelessness who have difficulty engaging with the Homeless Action Team for various reasons and requests/recommends the following:

- Recommends long-term sheltered housing for those who for whatever reason are unable to manage own-door accommodation.
- Requests that any mother under the age of eighteen presenting to the Homeless Action Team be facilitated and taken care of with her child/children.
- Requests that the Homeless Action Team is trained on domestic violence and coercive control so that women and children are fully supported by service providers and not held accountable for the actions of an abusive partner.
- Requests a policy of emergency outreach and offer of accommodation to anyone on the streets or living in insecure dwellings including trailers should be instigated during red weather warnings.
- Requests that the Council should undertake to provide emergency accommodation to all those presenting in need of it irrespective of their immigration or residency status in particular with respect to members of the Roma community.

Section 5.2.8 Traveller Accommodation & CDP5.10 Traveller Accommodation

Considers the current Traveller Accommodation Programme (TAP) 2019-2024 does not reflect actual community needs, refers to limitations in relation to vacancy rates in Traveller Specific Schemes and specific problems in Clare in relation to Traveller homelessness. Requests that a participatory Traveller Housing Needs Assessment is carried out and when reviewed the current TAP is amended and then reflected in the Plan.

Housing Assistance Payment (HAP)

Notes the Housing Assistance Payment (HAP) is the primary means by which local authorities provide social housing and refers to the implications of no national housing stock and privatization of the housing market. In this regard, the following is requested/recommended:

- Requests that any home approved for HAP be inspected for habitation, health and safety suitability.
- Recommends that Clare County Council do everything in its power to progressively move away from subsidising the private rental market and invest in publicly owned housing stock instead including through the Town Centre Renewal Policy.
- Requests that single occupancy units be an integral part of any local authority housing scheme meeting the needs of single women on lower incomes and that sufficient larger house sizes be provided to cater for the wide variety of family size in the County.
- Recommends that Clare County Council make long-term fixed tenancies for older people (that are not dependent on a private landlord) a priority.

Economic, Enterprise, Tourism and Retail Development

Nationally 50% of women work for €20,000 a year and women make up 86% of lone parents.

1. The CDP should strive to economically improve the lives of all people including all workers earning a living wage and less reliance on tourism as a means of employment as this may not be an all year-round income.
2. Aid local communities in the establishment of co-operatives and community-based agriculture.
3. Make sure all public buildings are fully accessible for people with disabilities. This should include appropriate toilets and changing facilities.
4. Footpaths should be wide enough and safe enough so wheelchair users can move around towns and villages at ease.
5. Make financial supports available to employers to encourage them to employ people with disabilities.

Chapter 10 – Sustainable Communities - Section 10.5 Diverse and Socially Inclusive Society

Refers to consultation with young people undertaken by Clare Youth Service in preparation for their submission on the forthcoming Government Policy Framework for Children and Young People in Ireland 2023-2028 and issues identified including ghettoization among young people, the need for community spaces to be available to them without prejudice, the lack of community space outside of sporting clubs, homelessness and rural transport as a barrier to accessing services and job opportunities. In this regard the following is recommended:

- Recommends consultation with the young people of Clare when planning recreational space for the community as a whole.
- Recommends that Clare County Council leads the way in providing traineeships within the Local Authority aimed at early school leavers.
- Asks that the voice of young people experiencing homelessness is heard when finalising Volume Eight – Clare Housing Strategy.

Chapter 18 Design and Placemaking

Refers to Article 28 of the United Nations Convention in the Rights of Persons with Disabilities (UNCRPD) relating not only to housing and medical care but also community facilities that facilitate full participation of people with disabilities including changing places. The recent

redevelopment of toilet facilities in Tim Smyth Park in Ennis is considered a missed opportunity. Recommends that Clare County Council makes a concerted effort to install a Changing Places facility in the largest urban area in each municipal district (Ennis, Shannon, Kilrush and Killaloe) as a minimum.

Chief Executive's Response

I would like to thank Clare Women's Network for the submission which highlights the following concerns:

The Sustainable Development Goals

Section 2.3.1, Chapter 2 of Volume 1, sets out the International Context for the county development plan which includes reference to the United Nations Sustainable Development Goals (SDG's) 2015. These goals have been considered and incorporated as appropriate in the preparation of the Draft Plan.

Chapter 1 Socio Economic Rights and Anti- Poverty

I note the request, however I do not consider it is necessary to amend the vision as requested. As set out in Table 1 Five Strategic Development Plan Principles, I consider the term 'Inclusivity', which is included in the Vision, expresses the Council's commitment to reducing social exclusion, poverty and deprivation.

Chapter 2 Climate Action

1. The Draft Plan contains a myriad of policies and objectives to support and facilitate energy developments (Chapter 11), including renewable energy (Chapter 11 & Volume 5 Clare Renewable Energy Strategy & Volume 6 Clare Wind Energy Strategy), protection of our waters (Chapter 2, 2.8 Flood Risk Management & Chapter 11, 11.3 Water Resources), agriculture (Chapter 6, 6.20 Agricultural Development & Chapter 8), forestry (Chapter 8), wastewater treatment (Chapter 4, Chapter 11 & Appendix 1), air quality (Chapter 11, 11.6.2 Air Quality)and provision of medical facilities (Chapter 10, 10.20 Healthcare and Wellbeing & zoned lands in Settlement Plans, Volume 3).
2. CDP2.14 Transition to a Low Carbon Economy and Society expresses the Council's commitment to climate/carbon proofing existing public buildings k) To support investments in the energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'; and l) To report annually on energy usage in all public buildings and to achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP). Therefore, I do not consider it is necessary to include a Strategic Aim in this regard.
3. I note the request made in the submission, however, the inclusion of representatives on the Adaptation Steering Committee or any other is not a matter for the Draft Plan.
4. The request to promote universal access to public transport in terms of the updated Smarter Travel policy is noted.
5. It is not within the scope of the County Development Plan to adopt a living wage policy.
6. I note the points made in relation to Climate Justice. In this regard, the Draft Plan contains appropriate policies and objectives to support and facilitate the provision of affordable housing (Chapter 5 & Volume 8 Clare Housing Strategy), renewable energy (Chapter 11 &

Volume 5 Clare Renewable Energy Strategy & Volume 6 Clare Wind Energy Strategy) and climate adaptation/mitigation measures (Chapter 2) and apprenticeships (Section 10.17.3 Third Level and Higher Education). The Council supports the retrofitting of homes in the County, including Council housing, however funding for retrofitting is provided by Sustainable Energy of Authority Ireland (SEAI).

Chapter 5 Housing Strategy

1. I acknowledge the concerns in relation to the housing supply targets for the County and the request that the Council engage with national government and seek an increase in these targets. With respect to projected housing needs, applicable figures in the Housing Strategy have been informed by two primary sources, the "Structural Housing Demand at County Level" figures as produced by the ESRI (published 14th December 2020), and the "Housing Supply Target Methodology for Development Planning" (published by the DHLG in December 2020). Consideration and application of these modelled figures has been advised through Ministerial direction (under Section 28 guidelines). The figures are aligned with national policy considerations under the National Planning Framework in this respect. With respect to how the aforementioned Housing Supply Target Methodology and Guidelines have been set out, there is no provision for the direct accounting of the existing social housing waiting list or households in receipt of HAP within the scope of the target figures. The Housing Strategy, in section 5.2 sets out the social housing waiting list figures (as of time of drafting), and further sets out in section 5.3 how Clare County Council is meeting this demand through a variety of different approaches and delivery streams.
2. The Council is committed to using all mechanisms available to it as appropriate and to work with Derelict Site owners to identify opportunities to bring derelict sites back in to use as confirmed in Objective CDP17.10, Chapter 17. Such mechanisms include the use of the Derelict Sites Act 1990 where appropriate to require owners to carry out suitable improvements, and to acquire properties which are appropriate to the Council's Capital Programme in order to carry out improvements to derelict sites and revitalise the surrounding areas. In this regard, Clare County Council's Derelict Sites Team have responsibility for dealing with derelict sites in County Clare including investigating all reports of dereliction and taking enforcement action in accordance with the Derelict Sites Act 1990. The Draft Plan promotes the Town Centre First Principles and includes Objective CDP17.1 to carry out public realm enhancement works as well as retail health checks, vacant site and derelict site surveys and other essential research and analysis to inform the actions required to support town and village centre renewal and development projects across County Clare.
3. Under the Urban Regeneration and Housing Act 2015 local authorities are required to produce a Vacant Sites Register, since 1 January 2017. This is a register of lands in the Council's administrative area that are suitable for housing but have not been put forward for development. Sites included on the register are subject to the Vacant Sites Levy.
4. Please refer to my response to point 2 above.
5. The further development of higher and further education including the development of additional apprenticeships is encouraged and supported by the Council. The Draft Plan contains policies and objectives in this regard including Section 10.17.3 Third Level and Higher Education and its associated Objective CDP10.17, including to support investment in Higher Education Institutes, Education and Training Board, apprenticeships, and skills development in the County as an enabler of jobs growth.

6. The Council is committed to working with approved housing bodies in the delivery of housing in the County. A Strategic Aim outlined in Chapter 5 Housing is to actively participate in the housing sector through the provision of public services, infrastructure and services for social, voluntary [including approved housing bodies] and private housing, and to implement the Clare County Housing Strategy 2023-2029 [set out in Volume 8 of the Draft Plan]. As noted in the Housing Strategy, as part of the Government's Housing For All policy, Local Authorities will play a key role (in partnership with Approved Housing Bodies) in delivering new social and affordable homes.
7. Inputs considered by the Housing Strategy in relation to macro-economic influences on income change, house price change and rental price change reflect a consensus of industry reckonable forecasts taken from a variety of sources at time of drafting. Sections 4.24, 4.2.5 and 4.2.6 each set out from where these sources have been drawn. A conservative outlook has been applied in their application over the plan period. The basis upon which the housing strategy models for affordability does consider this scenario-based view.

   It should be noted that at time of drafting, the assumptions considered were much more reflective of market and global factors at that time. However, it is recognised that there have been exceptional global influences on macro-economic considerations, as well as significant inflationary changes in domestic price dynamics for property. Clare County Council will seek to prepare updated perspectives and incorporate within the Housing Strategy as appropriate.

   The quantum of housing needs is otherwise derived from projections developed by the ESRI who have similarly concluded a likely scenario. Variability from a scenario-trajectory is naturally likely and therefore, both the housing supply targets and concluded affordability, social and specialist needs should be considered as 'broad estimates' – as per the National Planning Framework guidance in relation to the HNDA.

<u>Section 5.2.10 Housing for People with Disabilities</u>

In relation to universal access to public transport, 10.6 Universal Accessibility, Chapter 10, includes Objective CDP10.5 " b) In conjunction with representative organisations to promote disability awareness and improve equal access for all through universal design for public transport access, housing, social, cultural and recreational facilities and the public realm so as to improve quality of life equally for all."

<u>Section 5.2.4 Emergency Accommodation</u>

The Draft Plan contains policies and objectives in relation to homelessness and the accommodation provision including Section 5.2.4 Emergency Accommodation and its associated Objective CDP5.6 " To support the work of the Clare Homeless Action Team and ensure that assistance is provided to those who are homeless or who are at risk of homelessness in the County." This would include measures outlined in the submission.

<u>Section 5.2.8 Traveller Accommodation & CDP5.10 Traveller Accommodation</u>

Under the Housing (Traveller Accommodation) Act, 1998 Clare County Council must prepare and have adopted a programme of Traveller accommodation in their area. The Council is required under the Act, to provide for the carrying out of a housing needs assessment in respect of Travellers resident in the county and to provide for an extensive public notification and consultation process as part of the preparation of their Traveller Accommodation Programme.

Housing Assistance Payment (HAP)

The Draft Plan contains policies and objectives to support the delivery of appropriate housing in the County, in particular Chapter 5 and Clare County Housing Strategy 2023-2029, Volume 8 of the Draft Plan. The Housing Strategy outlines the existing and future housing requirements of County Clare and to set out measures for the Council to plan for and address these needs. In relation to the specific measures requested/recommended in the submission, this is an operational matter for the Housing Section of Clare County Council and is not within the scope of the Draft Plan.

Economic, Enterprise, Tourism and Retail Development

1. It is not within the scope of the county development plan to adopt a living wage policy. The Draft Plan contains policies and objectives to support year-round employment including tourism offering including 8.2.5 Agri-Tourism Development in Chapter 8, Volume 1. It is a Strategic Aim of the Chapter 9 Tourism to develop strong, year-round, high-quality integrated tourism products.
2. Section 6.21 Rural Enterprise and Section 8.2.4 Agriculture, Agri-Food and Agri-Tech promote the development of rural and agriculture based enterprises which could include the development of co-operatives and community-based agricultural enterprises. The establishment of such enterprise is not within the scope of the County Development Plan.
3. I acknowledge the need for accessibility in public buildings as well as appropriate toilet and changing facilities. Section 10.6 Universal Accessibility, Chapter 10 of the Draft Plan, and its associated Objective CDP10.5 promotes social inclusion by implementing best practice in universal accessibility and design and expresses the Council's commitment to work in conjunction with representative organisations to promote disability awareness and improve equal access for all through universal design for public transport access, housing, social, cultural and recreational facilities and the public realm so as to improve quality of life equally for all.
4. I note the points made in relation to footpath widths and safe wheelchair access in our towns and villages. As noted in Item no. 3 above, the Draft Plan contains policies and objectives for inclusivity and equal access through universal design and highlights the Council's commitment to same.
5. It is not within the scope of the County Development Plan to make financial supports available to employers to encourage them to employ people with disabilities.

Chapter 10 – Sustainable Communities - Section 10.5 Diverse and Socially Inclusive Society

I note the points made in the submission in relation to the needs of young people in County Clare and the need to ensure their voices are heard and their needs are met in the delivery of public facilities including recreational spaces. In relation to traineeships, as noted under 'Chapter 5 Housing Strategy' the further development of higher and further education is encouraged and supported by the Council which would include traineeships. In relation to consultation on the

Housing Strategy, as noted previously, this has been prepared as part of the County Development Plan process and public consultation has been carried out in accordance with the requirements of the Planning and Development Act 2000, as amended. In addition, a series of public consultation events have been held throughout the County. There will be a further opportunity to comment on the plan at the next stage in the plan making process.

Chapter 18 Design and Placemaking

While I acknowledge the need for Changing Places facilities, particularly the larger urban centres such as Ennis, Shannon, Kilrush and Killaloe, I am satisfied that this is addressed in Objective CDP 10.1(b) "To work in collaboration with all relevant stakeholders to facilitate the planning and delivery of accessible community facilities throughout the County. "

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/832 –Shannon Group	
Relevant Chapters / Topics	• **Shannon** • **Ennis** • **Climate Action** • **Urban and Rural Settlement** • **Economic Development and Enterprise** • **Tourism** • **Aviation and Shannon Estuary** • **Clare Wind Energy Strategy** • **Strategic Flood Risk Assessment**

Summary of Issues Raised in Submission

This submission sets out Shannon Group's vision which will support for the sustainable development of the County, details of the Group's portfolio of properties and operations within the Shannon area are provided as well as general information on the Shannon Group. In the submission the following is discussed:

Chapter 2: Climate Action

Supports the Plan's policies and objectives for the transition to low carbon future and request that the plan support initiatives by Shannon Group to achieve Government and European Union Climate Action Plans, including the following:

- Renewable energy projects in the Shannon Group Campus (the Campus includes the Shannon Free Zone, the surrounding land bank and adjacent property and the airport lands).
- Innovative pilot and demonstration projects for new renewable energy technologies, for example Solar farms, wind energy, renewable fuels.
- Development of sustainable multimodal mobility options, including the necessary enabling infrastructure.

Chapter 4: Urban and Rural Settlement Strategy

Refers to Objective CDP 4.4 with respect to Shannon and considers it imperative that the role of Shannon, Shannon Airport and the Free Zone are seen as the economic drivers for the region, and that Shannon's *Metropolitan Town* status is protected. Considers this should be a primary feature of the new Shannon Local Area Plan.

Chapter 6: Economic Development and Enterprise

Refers to Objective CDP 6.5 Development of Shannon and suggests that a further section is added to this objective which recognises Shannon Airport as not just a facilitator of enterprise and economic development in Shannon but as an enterprise and employment hub in its own right. It is recommended that the following additional objective is included:

> **x) To support the continued development of the Shannon International Airport campus as an employer in the region and economic development facilitator and support its redevelopment into the future.**

It is also recommended that point d) is expanded to include a wider range of opportunities, such as MedTech (as illustrated by the recently established MeiraGTx campus at Shannon), engineering and Information, Communications and Technology (ICT).

d)To support opportunities for the expansion of Shannon as a globally recognised centre of excellence for software engineering/aviation/logistics, MedTech, engineering and ICT.

Refers to Objective CDP 6.6 Shannon International Airport and considers it necessary to include a clear and explicit objective regarding support for energy security for the Airport, through supporting renewable energy initiatives which will allow the Airport to diversify and facilitate alternative developments as well as providing for the development of further infrastructure such as road access to adjoining lands. It is recommended that the following additional objectives are included:

x) To support and facilitate the development of renewable energy infrastructure within the airport and its confines, thereby enhancing energy security, including development of facilities in support of the aviation sector's transition to Sustainable/Renewable Aviation Fuel and energy.

x) Facilitate diverse non-aviation development typologies within the Shannon Group Campus.

Chapter 9: Tourism

Welcomes the inclusion of Objective CDP 9.22 Tourism in South Clare and the Limerick-Shannon Metropolitan Area and endorses recognition of the importance of Shannon International Airport and Bunratty Castle and Folk Park as key international scale facilities that support tourism in the region.

Chapter 11: Physical Infrastructure, Environment and Energy

Welcomes the inclusion of Objective CDP 11.7 Shannon Rail Link in particular its emphasis on delivering the N19 road upgrade and requests the inclusion of an additional objective to enhance existing road and mobility infrastructure to and from Shannon Free Zone East to facilitate better access and egress to this important development area.

Welcomes the inclusion of Objective CDP 11.19 Shannon International Airport and notes that this part of the Plan emphasises the need to grow the airport and enhance its international connectivity.

Endorses Objective CDP11.44, to promote electricity and gas grid infrastructure, and suggests that Clare County Council liaises with the main utility companies to ensure increased capacity is made available, which will enable ready to go solutions for provision of utility infrastructure services for new developments required to attract FDI's to the Region.

Refers to Section 11.7 SEVESO – Major Accidents Directive and recommends that reference is included to a new document from the Health and Safety Authority (HSA) entitled "*Guidance on technical land-use planning advice (2021) – For planning authorities and COMAH establishment operators.*

Chapter 13 Aviation and Shannon Estuary

Endorses Objective CDP12.12 and welcomes the establishment of the Shannon Estuary Economic Taskforce and its remit in relation to connectivity, policy and investment in the Region.

With respect to specific developments, it is requested that the Shannon Group is made aware of all development proposals within the area, to help ensure that non-compatible uses are identified and not progressed. In this regard, diverse non-aviation development typologies such as development of sustainable aviation fuels, alternative fuels, wind farms, solar farms and other such initiatives are supported in order to realise long-term potential as an economic driver.

Volume 6 – Clare Wind Energy Strategy

Considers it essential that the development of wind turbine projects in the region is cognisant of aircraft flight paths into and out of Shannon Airport

Volume 10c – Strategic Flood Risk Assessment

Supports the CFRAMS programme in particular the focus on the interdependencies of protecting airport infrastructure in tandem with Shannon Town which will complement and enhance refurbishment works undertaken by Shannon Group on the Eastern and Western flood defence embankments during 2021 and into 2022.

Volume 3b Shannon Municipal District Settlement Plan

Welcomes the 'Vision' set out in the Settlement Plan and notes that this Vision is underpinned by 12 strategic goals including Goals 3 and 4 to promote the continued growth of Shannon and the continued development of Shannon Airport. Considers these Goals can be further enhanced by amending the wording as follows:

3. To proactively pursue the continued growth of Shannon as a centre of industrial, enterprise and business excellence and as a globally recognised centre of excellence for software engineering, aviation and logistics, MedTech, engineering and ICT.

4. To support the continued development of Shannon International Airport as a national and international driver of economic, social and tourism growth through promotion of strategic route development and increased air connectivity

Employment, Economy and Enterprise

Welcomes the inclusion of Key Priorities and endorses recognition of the importance of the Shannon Free Zone as key international scale facilities that support development and investment in the region. Recommends the expansion of point c) to include Foreign Direct Investment (FDI) within the Zone and point f) to include a sustainable and climate resilient element.

c) To support the continuance and expansion of Shannon as a multi modal hub for air commerce, logistics and FDI.

f) To support Investment in the utilities infrastructure necessary to ensure the continued regeneration of the SFZ and for this to be carried out in a sustainable and climate resilient manner.

Shannon International Airport

Considers a strategic development area should be identified at airport lands to facilitate the development and expansion of Shannon Airport and the Shannon Group Campus Aviation Cluster and to improve airport access and connectivity.

Low Carbon Strategy

Notes that the overall Shannon area provides significant companies and business interests that could avail of innovative solutions including a future energy network that could provide

sustainable low carbon energy security and its road layout and abundance of open spaces also lends itself to the furthering of Smarter Travel including the provision of efficient, safe and high amenity walking and cycling routes.

Natural and Built Environment – Record of Protected Structures

Notes that the Old Shannon Airport Terminal and other buildings around the airport are designated as protected structures. Considers that the structures located at the airport campus should be reviewed to ensure that this designation does not hinder development of a cohesive masterplan for the Campus as there are plans to redevelop the Old Shannon Airport Terminal. It is respectfully requested that RPS No. 328 is removed from the Record of Protected Structures.

Shannon Infrastructural Resources including the Shannon Estuary

Supports the redevelopment of the N19 National Road upgrade and recognises and agrees that it should be a priority of Clare County Council.

Ennis Municipal District Settlement Plan

Welcomes the inclusion of the Clare Technological Park as a Transformational Site and emphasises the importance of the site in relation to the rejuvenation and transformation of Ennis Town Centre.

Chief Executive's Response

I thank Shannon Group for the comprehensive submission and acknowledge their extensive portfolio of properties and operations and remit within the Shannon area and Ennis in particular.

Chapter 2: Climate Action

I note the support of the policies and objectives in the draft Plan for the transition to a low carbon future and the request for the development plan to support future renewable energy projects on the Shannon Group Campus, pilot and demonstration projects for new renewable energy technologies and the development of sustainable multimodal mobility options, including the necessary enabling infrastructure. Climate action is a central and integrated theme in the draft Development Plan which reflects the commitment of the Council to supporting projects and development proposals which contribute to achieving the reduced energy emission targets in line with national policy. The Council has also produced a new Clare Renewable Energy Strategy as part of the draft Development Plan (Volume 5) which further reinforces the intention of the Council in this regard.

Chapter 4: Urban and Rural Settlement Strategy

As noted in the submissions the draft Development Plan provides strong policy objectives which support Shannon as a Metropolitan Town, playing a critical role within the Limerick-Shannon Metropolitan Area and seen as a critical driver for the Metropolitan Area, county and region and this will be reflected in the new Shannon Local Area Plan.

Chapter 6: Economic Development and Enterprise

I note the suggestion to include an additional section to policy objective CDP6.6 which recognises Shannon Airport as an employment and enterprise and economic hub in its own right. I consider that there is already strong policy support for Shannon International Airport provided for in

Chapter 6 and throughout the Draft Development Plan and the proposed additional objective does not add anything to what is already proposed in the draft Plan and therefore is unnecessary. I propose the following wording be included in the accompanying text to CDP6.6 as follows:

'The Airport is a gateway to Ireland's premier tourist locations and offers full US Customs and Border Protection (CBP) pre-clearance facilities to airlines travelling to the USA. Clare County Council recognises Shannon International Airport as an enterprise and employment hub and the opportunities that it ~~Shannon International Airport~~ provides as an international gateway, together with the large number of global logistics companies located in close proximity and the availability of 24 hour unrestricted aircraft landing and take-off operations. Clare County Council will encourage and support the diversification of the Airport and the provision of increased cargo-services.'

The proposed addition to part d of CDP6.5 is appropriate and I agree it should be included:

'd) To support opportunities for the expansion of Shannon as a globally recognised centre of excellence for software engineering/aviation/logistics~~;~~ -MedTech, engineering and ICT.'

As regards objective CDP 6.6 Shannon International Airport I acknowledge the importance of energy security for the airport and agree with the inclusion of the following in this objective:

'e To support and facilitate the development of renewable energy infrastructure within the airport and its confines, thereby enhancing energy security, including development of facilities in support of the aviation sector's transition to Sustainable/Renewable Aviation Fuel and energy.'

Chapter 11: Physical Infrastructure, Environment and Energy

Section 11.7 SEVESO – Major Accidents Directive – it is suggested that the new Health and Safety Authority document '*Guidance on technical land-use planning advice (2021) – For planning authorities and COMAH established operators'* be referenced and I agree this should be included within this section of the Draft Plan.

'*Clare County Council is required to seek technical advice from the Health and Safety Authority, which acts as the Central Competent Authority, in relation to any planning application directly pertaining to a SEVESO site or within 'consultation distance' of these establishments* . Technical guidance relating to HSA policy is provided for in G*uidance on technical Land-use Planning Advice (2021) – For planning authorities and COMAH established operators'* '

Chapter 13 Aviation and Shannon Estuary

I note the request for Shannon Group to be made aware of development proposals in the area. As part of the development management process planning applications are referred to Prescribed Bodies as set out in legislation, of which the Irish Aviation Authority is one but not Shannon Group.

Volume 6 – Clare Wind Energy Strategy

Planning applications for wind energy projects are referred to the Irish Aviation Authority as a Prescribed Body in line with current legislation.

Volume 10c – Strategic Flood Risk Assessment

Comments are welcomed and noted.

Volume 3b Shannon Municipal District Settlement Plan

I note the support of the vision for Shannon and in particular Goals 3 and 4 which promote the growth of both Shannon and Shannon Airport. The suggestion that these goals can be enhanced

still further with a slight amendment to the wording of the supporting Goals 3 and 4 is consider acceptable:

Goal 3. 'To proactively pursue the continued growth of Shannon as a centre of industrial, enterprise and business excellence and as a globally recognised centre of excellence for software engineering, aviation, ~~and~~ logistics, MedTech, engineering and ICT.'

Goal 4. 'To support the continued development of Shannon International Airport as a national and international driver of economic, social and tourism growth through promotion of strategic route development and increased air connectivity.'

Employment, Economy and Enterprise

I note the support for the Key Priorities for the Shannon Free Zone with a request for a slight extension to the third stated priority to include reference to Foreign Direct Investment (FDI) and to extend the sixth stated priority to include a sustainable and climate resilient element which is considered appropriate:

- To support the continuance and expansion of Shannon as a multi modal hub for air commerce, ~~and~~ logistics and Foreign Direct Investment.
- To support Investment in the utilities infrastructure necessary to ensure the continued regeneration of the SFZ and for this to be carried out in a sustainable and climate resilient manner.'

Shannon International Airport

I note the suggestion by Shannon Group that the airport lands should be identified as a strategic development area. There is a statutory process set out in the Planning and Development Act 2000 (as amended) regarding the process for the designation of a site as a Strategic Development Zone, which is a decision of the Government following a proposal by the Minister for the Environment, Heritage and Local Government.

I note there is very strong policy support in both the Regional Spatial and Economic Strategy for the Southern Regions (RSES and the Draft Clare County Development Plan in Volume 1: Written Statement and Volume 3b: Shannon Municipal District Settlement Plans, to facilitate future development and expansion of Shannon International Airport, the Shannon Group Campus Aviation Cluster and improved airport access and connectivity. This will be further reinforced in the forthcoming new Shannon and Environs Local Area Plan which will provide additional plan-led policy support. I am therefore of the opinion that the strong regional, county and local statutory planning policy support negates the need to seek SDZ designation.

Low Carbon Strategy

I acknowledge comments in relation to how the overall Shannon area provides significant companies and business interests that could avail of innovative solutions including a future energy network that could provide sustainable low carbon energy security and its road layout and abundance of open spaces also lends itself to the furthering of Smarter Travel including the provision of efficient, safe and high amenity walking and cycling routes. The draft Plan, Renewable Energy Strategy and forthcoming Local Area Plan will provide policy support towards implementing measures towards achieving low carbon initiatives in the Shannon area.

Natural and Built Environment – Record of Protected Structures

The Old Shannon Airport Terminal and other buildings around the airport are designated as protected structures and I note the request for the structures located at the airport campus to be reviewed and that RPS No. 328 be removed from the Record of Protected Structures (RPS). I refer you to Part 3 of this report which deals specifically with submissions relating to the RPS and responds to this request accordingly.

Shannon Infrastructural Resources including the Shannon Estuary

Comments are welcomed and noted.

Ennis Municipal District Settlement Plan

As noted in the submission the importance of the Transformational Site that includes the Clare Technological Park is a key site which offers significant development potential, and is recognised in the Draft Plan which provides strong policy support in this regard.

Chief Executive's Recommendation

I recommend that the following amendments be made to the Draft Clare County Development Plan 2023-2029 as follows:

Volume 1, Chapter 6: Economic Development and Enterprise

Insert the following wording in the accompanying text to CDP6.6 , page 129, second paragraph as follows:

'The Airport is a gateway to Ireland's premier tourist locations and offers full US Customs and Border Protection (CBP) pre-clearance facilities to airlines travelling to the USA. Clare County Council recognises Shannon International Airport as an enterprise and employment hub and the opportunities that it ~~Shannon International Airport~~ provides as an international gateway, together with the large number of global logistics companies located in close proximity and the availability of 24 hour unrestricted aircraft landing and take-off operations. Clare County Council will encourage and support the diversification of the Airport and the provision of increased cargo-services.'

Insert additional text into **Objective CDP 6.5 Development of Shannon, part d)** as follows:

d) To support opportunities for the expansion of Shannon as a globally recognised centre of excellence for software engineering/aviation/logistics, MedTech, engineering and ICT.

Insert additional point with text into **CDP 6.6 Shannon International Airport** as follows:

e) To support and facilitate the development of renewable energy infrastructure within the airport and its confines, thereby enhancing energy security, including development of facilities in support of the aviation sector's transition to Sustainable/Renewable Aviation Fuel and energy;

f) ~~e)~~ To ensure compliance with all relevant legislation as outlined in Objective CDP1.

Volume 1, Chapter 11: Physical Infrastructure, Environment and Energy

Insert additional text in **Section 11.7 SEVESO – Major Accidents Directive**

'*Clare County Council is required to seek technical advice from the Health and Safety Authority, which acts as the Central Competent Authority, in relation to any planning application directly*

pertaining to a SEVESO site or within 'consultation distance' of these establishments . Technical guidance relating to HSA policy is provided for in G*uidance on technical Land-use Planning Advice (2021) – For planning authorities and COMAH established operators' '*

Volume 3b Shannon Municipal District Settlement Plan

Strategic Goals - Insert additional text in Strategic goals 3 and 4 as follows:

Goal 3. 'To proactively pursue the continued growth of Shannon as a centre of industrial, enterprise and business excellence and as a globally recognised centre of excellence for software engineering, aviation, ~~and~~ logistics, MedTech, engineering and ICT.'

Goal 4. 'To support the continued development of Shannon International Airport as a national and international driver of economic, social and tourism growth through promotion of strategic route development and increased air connectivity.'

Employment, Economy and Enterprise -insert additional text in Key Priorities c) and f) as follows:

'**c** To support the continuance and expansion of Shannon as a multi modal hub for air commerce, ~~and~~ logistics and Foreign Direct Investment.

f To support Investment in the utilities infrastructure necessary to ensure the continued regeneration of the SFZ and for this to be carried out in a sustainable and climate resilient manner.'

Submission No: S2/835 –Avison Young on behalf An Post	
Relevant Chapters / Topics	• **Land Use Zoning Matrix** • **Car Parking, Deliveries and Access** • **Ennis** • **Shannon**

Summary of Issues Raised in Submission

This submission relates to current and new postal facilities. In the submission it is noted that An Post own and/or operate a number of postal services within County Clare including An Post Retail and An Post Mails and Parcel Distribution facilities in Ennis, Shannon and Kilrush. In the submission the following requests are made:

Future Provision of Postal Infrastructure

Due to changes arising from ecommerce, Covid 19 and population increases, An Post has assessed its portfolio of facilities to ensure the operational needs are met. The observation requests the Council provide a supportive policy framework for the future provision of postal infrastructure. Enhancement of An Post's facilities and provision of new facilities could generate employment in the County, increasing economic development, reinvigorating redundant and underutilised lands and supporting climate change mitigation with the transition to e-vehicles.

Flexible Zoning Objectives

Provide additional flexibility under the land use zonings and objectives in the CDP in relation to An Post's existing facilities and operational requirements for both its retail and distribution/logistics-type land uses.

In addition, it is requested that a new land use classification – Postal Facilities – in the CDP and identifying this use as 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives:

> "*Postal Facilities: A building which facilitates mail services that can include the processing, sortation and distribution of mail." (Note: This use can be assessed on a case-by-case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan)*.

Supportive Policies

Request the inclusion of new policy objectives in the County Development Plan in relation to supporting and facilitating both existing and new postal facilities in the County, for example:

- "To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the County."
- "To facilitate the provision of postal facilities and infrastructure at suitable locations in the County."
- "To promote the integration of appropriate postal facilities, including post offices, processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement."

Car Parking, Deliveries & Access

Requests that existing and future operational requirements for postal facilities are considered within the CDP including parking, deliveries and access as follows:

Car Parking

An Post requires c.3,000 vehicles on a daily basis to operate. Due to the increasing number of parcels being processed, this requirement will increase over time and greater levels of parking spaces, including EV charging points, will be required. Parking is also required for staff vehicles. The observation requests flexibility in car parking standards for postal facilities, which require sufficient parking to operate in an efficient manner. A greater quantum of parking may be required due to growing postal trends to ensure the future proofing of the long-term viability.

Deliveries & Access

It is requested that the Council to engage with An Post should any future area plan propose to amend delivery hours in town centre locations.

Considers it is important that a sufficient level of access is maintained and loading bay space is provided to accommodate collection/delivery and customers and requests that the Council to consult with An Post during the preparation of future Local Area/Public Realm/Urban Area Plan or Mobility Plan (e.g. Ennis - CDP4.1 to maintain a sufficient level of access whilst improving appearance and function of town centres.

Ennis

Notes the Ennis Settlement Strategy identifies a number of 'Transformational and Opportunity Sites' in the Town Centre including 2 no. Opportunity Sites immediately adjacent to the An Post facility at Bank Place (TS3 – Harvey's Quay & Post Office Field Including: OP4 Analogue Building adjoining Infill Site, Bank Place OP5 The Post Office Field. While the revitalisation of the Town Centre is welcome, the operational requirements of the existing postal facility need to be considered as part of the implementation of any redevelopment proposals and postal services can continue undisrupted and without any conflict that may arise as a result of any redevelopment.

Notes the support for future maintenance and upgrades to premises in the Gort Road Business Park), zoned Light Industrial LI3 in the Ennis Settlement Strategy.

Shannon

Notes reference in the Settlement Strategy to the Shannon Masterplan which is currently being prepared and will inform the forthcoming local area plan. Notes An Post have submitted on the draft Masterplan and highlights the need to ensure the operational requirements of the existing postal facility at the Sky Court Shopping Centre is considered as part of the implementation of any redevelopment proposals under the Shannon Town Masterplan.

Chief Executive's Response

I would like to thank An Post for the submission and I acknowledge the importance of the issues raised:

Future Provision of Postal Infrastructure

I acknowledge the important public service and economic role played by An Post. However, I consider that the Draft Plan sets out a comprehensive and robust strategy for reinvigorating redundant and underutilised lands and supporting climate change mitigation and the transition to e-vehicles. Policies and objectives relating to same are contained in various chapters including Chapter 2 Climate Action and Chapter 4 Urban and Rural Settlement Strategy.

Flexible Zoning Objectives

The Council is supportive of the provision of public services at appropriate locations, particularly in the Town and Village Centres and designated Neighbourhoods Centres. Each of these centres include sufficiently flexible zoning objectives which can accommodate An Post retail services, subject to compliance with all relevant Development Management Standards and planning criteria. Postal facilities fall into two different land uses: shop [postal] and warehousing [logistics/distribution]. Both these land uses are represented in *Volume 1, Appendix 2 - Indicative Land Use Zoning Matrix.* It is not considered necessary to add a further land use category to the matrix as this would duplicate the requirements. The Council considers that the logistics/distribution uses are not appropriate in every land use zone, particularly on residential zones as well as Community, Recreation, Open Space and Buffer Space zones. However, such uses [warehousing] are 'Open for Consideration' on Commercial, Enterprise, Industry, Light Industry and Marine Related Uses. In addition, Shop is 'Permitted in Principle' on the Mixed Use and Commercial zones and 'Open for Consideration' on Existing Residential, Residential and Low Density Residential zones as well as Community, Enterprise, Tourism, Light Industry and Maritime/Harbour zones. A use open for consideration is one which the Council may permit, where it is satisfied that the suggested form of development will be compatible with the policies and objectives for the zone, will not conflict with existing uses or the proper planning and sustainable development of the area. The Open for Consideration designation allows individual planning applications to be assessed on their merits and on a case-by-case basis having regard to all relevant planning criteria. It is considered that sufficient flexibility is available within the existing land use zoning classes to facilitate the provision of An Post facilities and no change to the zoning matrix is necessary.

Supportive Policies

The Council acknowledge the important public service and economic role played by An Post. However, the Draft Plan sets out a comprehensive and robust strategy to support and facilitate both existing and new facilities, such as postal facilities, in the county. For example, Section 7.3.6 Small Villages, in Chapter 7, Volume 1 of the Draft Plan, notes that retail services in small villages generally consist of rural shops, petrol filling stations, creameries, post offices and similar facilities, and includes Objective CDP7.9 "To facilitate retail development in small villages where the nature and scale of the proposed development is appropriate to the location and catchment."

Car Parking, Deliveries & Access

Requests that existing and future operational requirements for postal facilities are considered within the CDP including parking, deliveries and access as follows:

Car Parking

An Post requires c.3,000 vehicles on a daily basis to operate. Due to the increasing number of parcels being processed, this requirement will increase over time and greater levels of parking spaces, including EV charging points, will be required. Parking is also required for staff vehicles. The observation requests flexibility in car parking standards for postal facilities, which require sufficient parking to operate in an efficient manner. A greater quantum of parking may be required due to growing postal trends to ensure the future proofing of the long-term viability.

Section A1.6.3 Bicycle and Vehicle Parking Standards, in Appendix 1 Development Management Guidelines, Volume 1 of the Draft Plan, includes the accommodation of flexibility in exceptional circumstances. In this regard, applicants may propose an alternative parking arrangement to the standards as set out in the parking standards set out in Table A3 for the agreement of the Planning Authority. In the instance a deviation from the standards is proposed the applicant/developer shall submit details of the predicted parking requirements associated with the proposed development and the capacity of the proposed onsite provision to accommodate this demand (including at peak times. Therefore I consider it is not necessary to include policy support with reference to a specific workplace. Any future development proposals will be assessed on a case-by-case basis through the development management process. Applicants are advised to avail of pre-planning consultations with the Planning Authority, prior to submitting planning applications.

Deliveries & Access

I note the request that the Council to engage with An Post should any future area plan propose to amend delivery hours in town centre locations.

I note the issues raised in relation to access and parking/loading requirements to accommodate the daily operation of postal facilities. The Council will continue to prepare transport and public realm strategies, there will be opportunities for An Post to engage as part of the consultation process as appropriate.

Ennis

I note the issues raised in relation to the operational requirements of the existing postal facility adjacent to Transformational and Opportunity Sites identified in the Ennis Settlement Plan. In relation to any future proposals on these sites, there will be opportunities for An Post to engage as part of the consultation process as appropriate.

I note the reference to support contained in the Ennis Settlement Plan for future maintenance and upgrades to premises in the Gort Road Business Park.

Shannon

I note the issues raised in relation to the Shannon Masterplan and the forthcoming Shannon Local Area Plan. The preparation of both the Masterplan and the Local Area Plan are separate processes to the County Development Plan. As noted in the submission, the preparation of the Masterplan is underway with public consultation completed. The Local Area Plan process is due to commence immediately on completion of the County Development Plan and there will be an opportunity for

submissions to be made to the Shannon Town and Environs Local Area Plan once the plan preparation has been commenced.
Chief Executive's Recommendation
I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/836 –Gerry Ryan

Relevant Chapters / Topics

- **Wind Energy**

Summary of Issues Raised in Submission

This submission relates to the designation of lands in the Gallows Hill, Woodcock Hill and Ballycar Hill areas as "Strategic Wind Turbine" and request that Clare County Council:

- Remove the wind farm zoning.
- Refuse any applications for wind turbine development under current Plan.
- To place the needs of residents before profit.
- Acknowledge that zero risk is the only acceptable risk in relation to landslides and aviation safety.
- To learn from past disasters (e.g. Derrybrien, Meenbog) and to protect the environment.
- The government strategy for offshore wind energy should be the way forward.
- To ensure Woodcock Hill Bog and its surrounding areas are protected.
- To protect the hen harrier and other species.
- To recognise the impact that wind turbines have on residents due to noise, flicker and destruction of visual amenity.

Chief Executive's Response

I thank Gerry Ryan for his submission.

It is not within the remit of the Draft Renewable Energy Strategy (RES) or draft County Development Plan to comment on individual planning applications. The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level strategic mapping for the County and is not intended to provide the same degree of accuracy or detail as the research expected for a site-specific project, and therefore comment on the specific merits/characteristics of an individual site, for example in relation to proximity to housing, or in relation to ecological sensitivity, is beyond the scope of the draft RES.

I acknowledge the concerns over potential landslides and aviation safety associated with windfarm development. The development management process requires the highest standards of community and environmental protection. General safeguards on amenity and environmental protection are included in Section 17 of the draft RES.

The draft Plan also includes objectives CDP 3.1 Appropriate Assessment (AA), Strategic Environmental Assessment (SEA) and Strategic Flood Risk Assessment (SFRA) and CDP 11.47 Renewable Energy outline the requirement for the draft CDP and associated supporting volumes (including Volume 5, Clare Renewable Energy Strategy) to comply with all relevant EU Directives including the Habitats Directive, Birds Directive and the Water Framework Directive and all relevant transposing national legislation. Furthermore, it is an objective of Clare County Council to support the sustainable development of renewable wind energy at appropriate locations, and in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment, and protected habitats and species, and to assess proposals having regard to

associated SEA and AA.

The landscape, topography and wind energy resource in this part of Ireland makes wind farm development a sensible approach for the county. In recognition of the climate and biodiversity crises currently facing Ireland and global populations, private sector investment is critical to achieving the ambitious targets set forth. Clare County Council seek to create an environment which encourages collaboration between private companies, public sector, education sector and local communities which will promote research, development and innovation, and which will create new opportunities for the people of Clare whilst supporting a just transition to a net-zero emissions environment.

The Maritime Area Planning Act 2021 (MAP Act) was signed into law on the 23rd of December 2021. This legislation represents the biggest reform of marine governance since the foundation of the State and demonstrates the Government's commitment to prioritising the strategy for Offshore Wind Energy in terms of reform. The Act establishes a comprehensive and coherent marine planning system including the establishment of the Maritime Area Regulatory Authority (MARA) a dedicated agency to undertake certain consenting and enforcement functions in the new regime. It is hoped that MARA will become operational in Q1 of 2023 at which point it will be possible to commence consenting of Offshore Renewable Energy projects under this new regime. Clare County Council have actively inputted to, supported and promoted the development of the MAP Act and the establishment of MARA and will continue to ensure it is operational in 2023.

In the draft Plan there is a commitment through the inclusion of a specific objective to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 20203-2029 on the basis of this submission.

Submission No: S2/837 –Orla Ryan	
Relevant Chapters / Topics	• **Wind Energy** • **Shannon Municipal District**

Summary of Issues Raised in Submission

This submission relates to the designation of lands in the Gallows Hill, Woodcock Hill and Ballycar Hill areas as "Strategic Wind Turbine" and request that Clare County Council:

- Remove the wind farm zoning.
- Refuse any applications for wind turbine development under current Plan.
- To place the needs of residents before profit.
- Acknowledge that 0 risk is the only acceptable risk in relation to landslides and aviation safety.
- To learn from past disasters (eg Derrybrien, Meenbog) and to protect the environment.
- The government strategy for offshore wind energy should be the way forward.
- To ensure Woodcock Hill Bog and its surrounding areas are protected.
- To protect the hen harrier and other species.
- To recognize the impact wind turbines have on residents due to noise, flicker and destruction of visual amenity.

Chief Executive's Response

I thank Ms. Ryan for her submission.

It is not within the remit of the Draft Renewable Energy Strategy or draft County Development Plan to comment on individual planning applications. The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level strategic mapping for the County and is not intended to provide the same degree of accuracy or detail as the research expected for a site-specific project, and therefore comment on the specific merits/characteristics of an individual site, for example in relation to proximity to housing, or in relation to ecological sensitivity, is beyond the scope of the draft RES.

I acknowledge the concerns over potential landslides and aviation safety associated with windfarm development. The development management process requires the highest standards of community and environmental protection. General safeguards on amenity and environmental protection are included in Section 17 of the draft RES.

The draft Plan also includes objectives CDP 3.1 Appropriate Assessment (AA, Strategic Environmental Assessment (SEA and Strategic Flood Risk Assessment (SFRA and CDP 11.47 Renewable Energy outline the requirement for the draft CDP and associated supporting volumes (including Volume 5, Clare Renewable Energy Strategy to comply with all relevant EU Directives including the Habitats Directive, Birds Directive and the Water Framework Directive and all relevant transposing national legislation. Furthermore, it is an objective of Clare County Council to support the sustainable development of renewable wind energy at appropriate locations, and in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment, and protected habitats and species, and to assess proposals having regard to

associated SEA and AA.

The landscape, topography and wind energy resource in this part of Ireland makes wind farm development a sensible approach for the county. In recognition of the climate and biodiversity crises currently facing Ireland and global populations, private sector investment is critical to achieving the ambitious targets set forth. Clare County Council seek to create an environment which encourages collaboration between private companies, public sector, education sector and local communities which will promote research, development and innovation, and which will create new opportunities for the people of Clare whilst supporting a just transition to a net-zero emissions environment.

In the draft Plan and the RES there is a commitment through the inclusion of specific objectives to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 20203-2029 on the basis of this submission.

Submission No: S2/841 –Limerick Chamber	
Relevant Chapters / Topics	• **Economic Development** • **South Clare/University of Limerick Economic Strategic Development Zone (SDZ)**

Summary of Issues Raised in Submission

Limerick Chamber welcome the ambitious nature of the plan and look forward to ongoing collaboration with Clare County Council.

General

A number of concerns are raised in relation to the planned University of Limerick University Town and Strategic Development Zone (SDZ) and potential to impact the progress and development of Limerick City. In this regard, the submission refers to a number of plans and strategies including Project Ireland 2040, Limerick 2030, the University of Limerick Strategic Plan and the Regional Spatial and Economic Plan for the Southern Region and the importance of revitalising existing urban centres.

Student and Residential Accommodation

In the submission the following is recommended:

- The CCDP must include greater clarity on the volume of housing to be provided in the SDZ and University Town.
- Engage with land holders and home building providers for the provision of student and residential accommodation in Limerick city centre.
- A large increase in appropriate and affordable housing must be central to the plan and must be delivered in conjunction with other stakeholders – Limerick Chamber feels that the city centre of Limerick is an appropriate location for such housing given its proximity to the main public transport nodes of the Mid-West, proximity to employment opportunities and existing social infrastructure in place.
- Any housing or other plan that is implemented must take account potential detraction from Limerick city centre but also the synergies that might be available if Limerick city centre is included in the plan. Housing provision most adhere to the strategy outlined within the NPF.
- Housing offerings must be sustainable from an affordable and environmental perspective, but also must cater for people from all ability backgrounds to promote and inclusive and diverse student population.
- Limerick city centre to be prioritised in line with the University of Limerick's Strategic Plan (UL@50) and other national and local policy documents.

International Context

In the submission the following is recommended:

- Emulate other European cities approaches to dispersing their university across more than one location. Universities which have a city centre campus have shown the benefits it has on the vibrancy of the city. There are cases where urban domiciled universities successfully implement research and industrial parks.
- Adopt best practice guidelines from European universities in respect of urban development and placemaking.

- Focus on the provision of a sustainable transport network for students and staff and other visitors.
- Investigate the potential for other avenues of targeted investment, such as a corridor built around existing urban areas, which may provide a more equal spread of economic growth.

Transport

In the submission the following is recommended:

- Prioritise sustainable and active travel to the University while taking advantage of the planned public transport infrastructure to further link Limerick city centre and the University of Limerick.
- Examine any potential issues of increased vehicle congestion / use from two scenarios, with the LNDR proceeding and with LNDR not proceeding.
- Investment in the SDZ and University Town must not deprioritise or detract investment from the city centre.

Land, Business and Environmental Impact

In the submission the following is recommended:

- Re-evaluate population growth projections from Clare to direct more population growth to existing settlements to protect their local economies.
- Examine the potential use of other state-owned sites closer to Limerick city centre where the university could collaborate with existing landowners and occupiers to build an extensive city centre campus.
- Clarify the interaction of private land with regards to the overall SDZ plan. i.e., are talks in place to purchase the land, will it be a joint venture or strategic partnership, can the land fall under a compulsory purchase order and will there be any element of land value capture for private owners of land.
- Prioritise playing pitches and other social infrastructure on the north side of the campus to ensure that they are not displaced as part of any future development plans and collaborate with existing third level institutions to focus on increasing the provision of education facilities in Limerick city centre as per various local plans.
- Commission an independent study examining how the introduction may impact commercial vacancy in Clare and Limerick, paying close attention to the potential for the SDZ to pull residential and businesses closer to the SDZ. A steering committee made up of various stakeholders should oversee this independent piece of research.

Collaboration, Stakeholder Engagement & Governance

In the submission the following is recommended:

- Engage with the LDA around developing or assembling potential sites in Limerick City Centre that adhere to the Project Ireland 2040 strategy.
- Establish a steering group for the development with representatives from a diverse range of backgrounds.
- Ensure transparency with regular public updates, this should include publishing existing preliminary plans.
- Ensure regular consultation with public and private organisations as well as students and staff of the university and also citizens of both counties.

- Prioritise the development of the city centre campus utilising the collaborative approach outlined above.

Chief Executive's Response

I acknowledge the submission from Limerick Chamber the content of which is noted.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan on the basis of this submission.

Submission No: S2/844 –Jutta Kruse	
Relevant Chapters / Topics	• **Wind Energy** • **West Clare**

Summary of Issues Raised in Submission

The submission relates to the designations in the Renewable Energy Strategy and maps and included with this submission.

- Requests to remove the designation 'Acceptable in principle (Wind Energy)' from the yellow highlighted area on map and replace with 'Open for Consideration'.
- This would relieve the threat of additional turbine noise and shadow flicker. There are 6 existing wind farms impacting this area.
- It would also safeguard the protected views from Designated Scenic Route 15 (R474 from Connolly to Miltown Malbay). Existing views from this route include Seascapes Character Areas no's. 4, 5, 6 and 7 as well as views from Doolough Lake.

Chief Executive's Response

I thank Jutta Kruse for the submission.

The Wind Energy Strategy is included as Volume 6 of the draft Development Plan and there is a commitment through the inclusion of a specific objective in both the draft Renewable Energy Strategy in Section 6.6 Policy Provision and in Volume 1, objective CDP 11.47 Renewable Energy of the draft Plan to prepare a new Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. The preparation of a new Wind Energy Strategy will involve a review of the exiting WES in developing future policy for the county.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/848 –Cllr Clare Colleran Molloy

Relevant Chapters / Topics

- **Housing**

Summary of Issues Raised in Submission

This submission relates to a request to facilitate ancillary dwelling units within the County.

- Request for written policy with respect to ancillary dwelling units.
- There is unwritten policy in the county whereby granny flats are permitted where justified and with certain conditions attached ie granny flat cannot be sold or rented.
- With current shortage of housing supply and increase in construction costs the council need to be creative with new planning policies to alleviate this pressure. An example of one such policy is Accessory Dwelling Units (ADUs) which has been adopted in United States.
- Requests that a similar policy is considered whereby these types of units can be considered favorably and without the restrictive conditions attached to granny flats.

In the interests of clarity and transparency, and accepting that each application is unique and will be decided on a "case by case" basis, it is asked that the following be considered in devising a written policy on ADUs to be contained in the Clare County Development Plan for 2023 – 2029:-

1. That ADUs be permitted and will be considered favourably in County Clare.
2. That ADUs can be leased/let.
3. That ADUs need not be conditioned on being occupied by the relatives, adopted persons or dependents of the principal dwelling property owner.
4. That the acceptable setbacks, height, maximum square metres, and required % yard area allowable be stated.
5. That the maximum allowable size of an ADU be determined based on the size of the principal structure and site and the presence of other structures on the property, e.g., an ADU will be subject to 70% principle dwelling size subject to maximum area whichever is less. [Example from US Local Authority: Principal Dwelling Size: 1,026 sf ADU 70%: 718 sf. Lot Size: 13,068 sf 5% of Lot: 653 sf. Max ADU size: 653 sf].
6. That a permanent foundation be required for the ADU (making Mobile Homes & RVs not permitted).
7. That the application process be simplified to speed up processing.
8. That ADUs must meet all building, housing and fire codes.

Chief Executive's Response

I wish to thank Cllr Clare Colleran Molloy for her submission and I have reviewed the Accessory Dwelling Units policy referred to in the submission (ADU. The ADU is similar to what we in Ireland refer to as a Granny Flat, however in the case of an ADU it may be used for short term rentals and advertised to the public market.

Such "granny flat" units in Ireland are permitted as ancillary units to the main unit as they share various aspects of the site, like access, open space, treatment system etc and therefore it is not reasonable that such a unit be let/rented to the general public as this would overburden these

shared facilities and lead to issues in relation to residential amenity for the site and neighbouring properties.

If such sites were capable of being subdivided in the first instance, then they would be able to obtain planning permission to do so and any potential new unit would not be restricted in terms of being sold or rented separately.

I am not in favour of a ADU/granny flat/dependent relative policy that would be for rent to the general public. As above these units are ancillary to the main dwelling due to sharing services and are not independent units and must not be let, leased or sold individually.

In relation to the insertion of a policy on granny flats where such units/extension are not let leased or sold separately, such a policy would normally be prescriptive in terms of size, format and need and it is the experience of the Planning Authority that an application for such units are generally site specific with a genuine need for a housing solution be it addressing a housing need, a medical issue, or a type of sheltered yet independent living need. It is my concern that being prescriptive in policy terms would hinder the Planning Authority in facilitating the genuine needs of the people and as such it is preferable not to include a granny flat policy.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/858 –Jack Ryan

Relevant Chapters / Topics

- **Wind Energy**
- **Land Zoning**
- **Shannon Municipal District**

Summary of Issues Raised in Submission

This submission relates to the designation of lands in the Gallows Hill, Woodcock Hill and Ballycar Hill areas as "Strategic Wind Turbine" and request that Clare County Council:

- Remove the wind farm zoning.
- Refuse any applications for wind turbine development under current Plan.
- To place the needs of residents before profit.
- Acknowledge that 0 risk is the only acceptable risk in relation to landslides and aviation safety.
- To learn from past disasters (eg Derrybrien, Meenbog) and to protect the environment.
- The government strategy for offshore wind energy should be the way forward.
- To ensure Woodcock Hill Bog and its surrounding areas are protected.
- To protect the hen harrier and other species.
- To recognise the impact wind turbines have on residents due to noise, flicker and destruction of visual amenity.

Chief Executive's Response

I thank Jack Ryan for the submission.

It is not within the remit of the Draft Renewable Energy Strategy (RES) or draft County Development Plan to comment on individual planning applications. The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level strategic mapping for the County and is not intended to provide the same degree of accuracy or detail as the research expected for a site-specific project, and therefore comment on the specific merits/characteristics of an individual site, for example in relation to proximity to housing, or in relation to ecological sensitivity, is beyond the scope of the draft RES.

I acknowledge the concerns over potential landslides and aviation safety associated with windfarm development. The development management process requires the highest standards of community and environmental protection. General safeguards on amenity and environmental protection are included in Section 17 of the draft RES.

The draft Plan also includes objectives CDP 3.1 Appropriate Assessment (AA), Strategic Environmental Assessment (SEA) and Strategic Flood Risk Assessment (SFRA) and CDP 11.47 Renewable Energy outline the requirement for the draft CDP and associated supporting volumes (including Volume 5, Clare Renewable Energy Strategy) to comply with all relevant EU Directives including the Habitats Directive, Birds Directive and the Water Framework Directive and all relevant transposing national legislation. Furthermore, it is an objective of Clare County Council to support the sustainable development of renewable wind energy at appropriate locations, and in accordance with all relevant policies, guidance and guidelines pertaining to the protection of

the environment, and protected habitats and species, and to assess proposals having regard to associated SEA and AA.

The landscape, topography and wind energy resource in this part of Ireland makes wind farm development a sensible approach for the county. In recognition of the climate and biodiversity crises currently facing Ireland and global populations, private sector investment is critical to achieving the ambitious targets set forth. Clare County Council seek to create an environment which encourages collaboration between private companies, public sector, education sector and local communities which will promote research, development and innovation, and which will create new opportunities for the people of Clare whilst supporting a just transition to a net-zero emissions environment.

The Maritime Area Planning Act 2021 (MAP Act) was signed into law on the 23rd of December 2021. This legislation represents the biggest reform of marine governance since the foundation of the State and demonstrates the Government's commitment to prioritising the strategy for Offshore Wind Energy in terms of reform. The Act establishes a comprehensive and coherent marine planning system including the establishment of the Maritime Area Regulatory Authority (MARA) a dedicated agency to undertake certain consenting and enforcement functions in the new regime. It is hoped that MARA will become operational in Q1 of 2023 at which point it will be possible to commence consenting of Offshore Renewable Energy projects under this new regime. Clare County Council have actively inputted to, supported and promoted the development of the MAP Act and the establishment of MARA and will continue to ensure it is operational in 2023.

In the draft Plan there is a commitment through the inclusion of a specific objective to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/859 –David Burke	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission relates to the proposed new interchange on the M18 onto the Quin Road (section 11.2.9.1) of Draft Plan.

- The plan ignores risks to pedestrians and cyclists. The Quin Road is only major route into Ennis without footpaths and cycle lanes. Located along this road is a football pitch, houses, halting site and business park.
- This will add to the increase in traffic. Would have serious concerns about the redirecting of traffic from a dual carriageway leading to Clare Abbey roundabout or onto Clonroad.

Chief Executive's Response

I thank David Burke for the submission and address the issues raised below:

The Core Strategy of the draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/860 – Karen McGuinness	
Relevant Chapters / Topics	• Ennis • M18 Interchange at Quin Road • Transport

Summary of Issues Raised in Submission

This submission relates to the proposed new interchange on the M18 onto the Quin Road (section 11.2.9.1) of Draft Plan.

- This should be excluded from the Plan and a transport plan for the town should first be put in place.
- Questions the suggestion for a large car park at the train station to replace the town car parks especially with it being so far removed from the town centre.
- The reason for high volumes of traffic on existing motorway access routes is due to lack of footpaths/cycle lanes and public transport.
- Rather than build a new motorway junction there is a need to connect the Eastern and Western parts of town by completing the road linking the Gort road to Lahinch road.
- No public facilities such as parks and schools or proper walking/cycling paths to support housing developments especially Eastern side of town which has seen significant development.
- The Mart, hardware stores and industrial units on Quin road has access requirements for heavy transport. As an alternative, upgrading the Skehanagh motorway link road or building a bridge over train tracks linking the industrial units at Tobarteascain would be a simpler and cheaper solution.

Chief Executive's Response

I thank Karen McGuinness for the submission and address the issues raised below:

The Core Strategy of the draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the draft CDP in relation to this request.

Chief Executive's Recommendation
I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/862 – Irish Concrete Federation	
Relevant Chapters / Topics	• Rural Development and Natural Resources

Summary of Issues Raised in Submission

This submission is on behalf of the trade federation for Irish concrete and quarrying industries. Included with this submission is a copy of their publication "Essential Aggregates Providing for Ireland's Needs to 2040" which sets out the key issues for their members from accesses to resources to enforcement against unauthorized development, all of which is supportive of the relevant policies and objectives of the draft Plan.

In the submission, the following are recommended:

1. Request that the issues outlined in the publication be reflected in Section 8.3.6 Extractive Industries in the Plan especially with the large number of quarries in the county some of which are of regional and national importance.
2. Considers that a national policy for aggregates must be developed by Government to underpin and inform local and regional planning policy and to promote the identification and protection of essential strategic reserves of aggregates throughout Ireland.
3. Considers every local authority or area development plan should give due regard to the information contained in the Geological Survey Ireland Aggregate Potential Mapping resource maps when considering policy for the protection and zoning of raw material reserves.
4. Considers that the industry should have the opportunity to inform planning authorities on the location of substantial strategic aggregate reserves through the review of Development Plans and Local Area Plans.
5. Considers that it is imperative that a scoping process is implemented for all quarry planning applications and that planning authorities are sufficiently resourced to carry out EIA scoping for planning applications.
6. Request that an Bord Pleanala should prioritise quarry development to ensure its statutory objective of deciding appeals within 18 weeks is achieved.
7. Request that planning applications are directed to An Bord Pleanala in respect of large scale extractive applications subject to thresholds in terms of scale or output.
8. Request that planning permission durations is extended to commensurate with the planned extraction of resources which can often exceed 30 years.
9. Request that sufficient planning consents are issued to meet demand and to help the extractive industry to thrive in a sustainable manner with priority given to existing sites.
10. Consider that government must actively promote a strong and consistent commitment to enforcement by planning authorities.
11. Consider a policy for procuring materials only from authorized sources by the state and local authorities is essential to protect the environment and support compliant businesses.
12. Consider that government should adopt national end of waste criteria to facilitate the processing and reuse of recycled aggregates in the construction chain within a supportive planning framework.
13. Consider proactive and practical steps to address knowledge and understanding gaps within the planning system on the unique nature, duration and impacts of quarrying.
14. Consider that resources within the three regional assemblies should be pooled to provide specialist expertise in local authorities.

15. Welcomes the text of objectives CDPs 8.2 and 8.14 both of which are supportive of natural resources.
16. Welcomes the commitments in Section 8.3.6 for safeguarding reserves from sterilization from other more footloose forms of development and a commitment to a strict enforcement policy against unauthorized extractive development would be welcome.
17. Request that strict application of both EIA and NIA requirements given the potential for impact of extractive developments on the environment.
18. To include a specific section on quarry developments to inform applicants of what is required for a robust application.
19. Consider a comprehensive planning and environmental report or EIA screening report, if above minimum thresholds, which can deal with the on going works and use of a quarry (this approach is supportive of CDP8.3(c)). The Construction Environmental Management Plans are not an appropriate mechanism for assessing smaller quarry developments which do not require an EIA.
20. Include in relation to Section 11.5 and specifically CDP11.38(c) regarding C&D Waste the identification of existing quarries as preferred locations for C&D recycling and soil recovery as this would maximise the re-use of secondary aggregates as direct substitutes for virgin materials (concrete, asphalt and stone recycling) and assist in the reinstatement of quarry sites.

Chief Executive's Response

I wish to thank Irish Concrete Federation for the submission to the Draft Plan.

1. I recognise the importance of the aggregates industry and the value to the economy, as well as the issues raised in the submission. I consider the policies and objectives contained in the Draft Plan, in particular Section 8.3.6 Extractive Industry, Chapter 8, Volume 1 address the extractive industry.
2. I note the points made in relation to the need for a national policy for aggregates to be developed by Government to underpin and inform local and regional planning policy and to promote the identification and protection of essential strategic reserves of aggregates throughout Ireland, however this is not within the scope of the county development plan.
3. The Draft Plan has been prepared in accordance with relevant legislation and using all available data which includes GSI data where appropriate.
4. While I note the points made in the submission, the identification of locations of substantial strategic aggregate reserves is not a matter for the County Development Plan or local area plan.
5. I note the comments made in relation to the need for a scoping process for quarry planning applications and sufficiently resourced planning authorities to carry out EIA scoping for planning applications.
6. It is not within the scope of the County Development Plan to request an Bord Pleanala to prioritise quarry developments to ensure its statutory objective of deciding appeals within 18 weeks is achieved. An Bord Pleanala is an independent planning body that decides appeals on planning decisions made by local authorities as well as direct applications and the Council have no responsibility for quarry or other applications that come before the Bord.

7. The type of planning applications directed to An Bord Pleanala is a matter for the relevant Minister.
8. The Council have no remit over the duration of planning permissions, this is a matter for the relevant Minister.
9. It is not appropriate to grant permission based on demand alone. All proposals for quarrying etc. are assessed via the development management process having regard to the county development plan and relevant regional, national and EU policy.
10. I note the comments made in the submission and I consider that Clare County Council are adequately committed to enforcing planning policy in accordance the relevant planning legislation.
11. It is not within the remit of the County Development Plan to set out procurement policy for the state or the Council.
12. I note the comments in relation to the need for a national end of waste criteria to facilitate the processing and reuse of recycled aggregates in the construction chain within a supportive planning framework. However, it is not within the remit of the County Development Plan to set national policy.
13. I note the points made in the submission; however it is not within the remit of the County Development Plan to address knowledge and understanding gaps within the planning system.
14. I acknowledge the points made in the submission in relation to the provision of a specialist expertise in local authorities, however, it is not within the scope of the County Development Plan to allocate regional assembly resources.
15. I welcome the positive comments in relation to objectives CDPs 8.2 and 8.14 which are supportive of natural resources.
16. I welcome the positive comments in relation to Section 8.3.6 which relates to safeguarding reserves.
17. All developments are required to be assessed relevant against local, national and EU Policy including both EIA and NIA requirements if appropriate. In this regard, Objective CDP 3.1 Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment in Chapter 3 of the Draft Plan requires compliance with the objectives and requirements of the Habitats Directive, specifically Article 6(3) and where necessary 6(4), Birds, Water Framework, and all other relevant EU Directives and all relevant transposing national legislation; To ensure that European sites and Natural Heritage Areas (designated proposed NHAs) are appropriately protected.
18. I note the points made in the submission and in this regard, a pre-planning consultation may be requested with the Planning Authority prior to submitting any planning application.
19. I note the points made in the submission in relation to the assessment of smaller quarries which do not require an EIA. In this regard, requirements for quarry applications are guided by national and European policy as well as EPA Guidelines including Environmental Management Guidelines – Environmental Management in the Extractive Industry (Non-Scheduled Minerals). The revision of same is not within the scope of the county development plan.
20. I note the points made in the submission, however, it is appropriate for construction and demolition waste to be disposed of to appropriately licenced premises, whether a quarry or not.

Chief Executive's Recommendation
I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/863 –Construction Industry Federation	
Relevant Chapters / Topics	• **Zoning** • **Housing** • **Infrastructure**

Summary of Issues Raised in Submission

This submission raises the following points:

- To ensure that policy objectives support the viability of future developments and to move to compact growth, higher densities on infill/brownfield sites will have an impact on construction industry and housing market.
- Developments will not be progressed if the construction industry cannot demonstrate financial viability to the investment sector.
- Viability of developments will be dependent on an adequate supply of affordable land and the market demand for residential units.
- Importance of flexibility in residential zoning objectives.
- Infrastructure capacity of towns and individual sites.

Phased Zoning

- De-zoning current residential lands during a housing crisis is counterintuitive.
- Zoning of lands is guided by the need to have development closer to the centre of settlements first and care should be taken in adopting this approach in the context of catering for short to mid-term housing needs.
- Promoting unviable brownfield sites has the potential to result in a significant shortfall in housing provision.

Adequate supply of development land

- Given the emphasis of the NPF and RSES on compact development we are concerned that the quantum of developable land is overestimated because insufficient research is carried out on measuring existing constraints.
- Land costs can be a significant factor for housing delivery costs and limited supply of available land.
- Developments will not be progressed if construction industry cannot demonstrate financial viability to the investment sector.
- Demand specific to unit type is an important consideration in this regard as it clearly justified density specific zoning policies.
- Welcomes the fact that an additional provision of 25% has been applied to the Core Strategy and have been pragmatic in including a Strategic Residential Reserve.
- It is critical that a review mechanism is incorporated into the Plan.
- The 2 year review report after the making of the Plan should assess the impact Covid-19 has had on living arrangements and to see if the target number of residential units needed are being built annually and if not the reasons why.
- Updated population projections and migration figures, number of applications and commencement notices and number of housing completions should be considered in context of that review.

- At the 2 year review stage to be prepared to provide for additional residential zoned land if there is evidence of the shortage in housing.

Brownfield sites

- Developing residential units in town centres is more expensive because of the increased cost on building on brownfield sites.
- Brownfield sites are challenging as many are in multiple ownership, often contaminated, require demolition works, poorly serviced and often located in areas which require significant regeneration.
- Without active land management measures and national incentive schemes few will be commercially viable.
- Welcomes that the Plan acknowledges these difficulties and that it will incorporate active land management measures to contribute to the commercially viability of development of these sites.
- A viability assessment of all key brownfield and infill sites should be considered.

Housing Density

- There is a resistance to higher density developments and particularly apartment developments in areas outside the core city centres.
- The development industry cannot source finance to build housing that does not fit with actual market needs.
- It is recognized there is a national requirement for more economic use of land.
- However, the minimum density requirements per development, together with required ratios for unit types and minimum design standards is unresponsive to market demand.
- A policy which provides no flexibility on density levels will contribute to housing supply crisis.
- The level of change required by the NPF will take several Development Plans to change long term patterns of development.

Limerick-Shannon MASP

- This area is the centre of the slowest growing SPA in country.
- Sharing the same river valley, road and rail networks there is a need for an integrated approach.
- Welcomes the Strategic Integrated Framework Plan with stakeholders from Limerick, Clare and Kerry on the steering group.
- It is hoped this collaborative approach can continue with the development of Shannon town and surrounding areas.

Infrastructure

- The lack of infrastructure particularly water is constraining development.
- Whilst recognizing that infrastructure investment is co-ordinated across different government bodies, the Council should be empowered to deliver infrastructure requirements.

Sustainability

- Policies need to be realistic and should ensure that the total cost of meeting the requirements set down by those policies does not undermine the deliverability of new housing.

Chief Executive's Response

I wish to thank the Construction Industry Federation for the submission and address the issues raised as follows:

Phased Zoning

The Draft Development Plan contains a provision for strategic residential reserve lands in many settlements, which is a mechanism that includes lands where they comprise infill or contiguous sites or have a planning history of residential use and can form part of the long-term sequential expansion of the settlement where considered appropriate. In addition to protecting these lands for the long term expansion of these settlements, consideration may be given to the development of some of the strategic residential reserve before the end of the plan period where the Planning Authority is satisfied that the development of zoned land is progressing faster than expected and a shortage of available lands may arise or residential zoned land may not be delivered as expected and a shortage may arise during the plan period.

Dezoning has occurred particularly in areas that are unserviced, are at risk of flooding and also to meet the requirements of the Core Strategy within the lifetime of the Draft Development Plan. The promotion of the development of brownfield sites in favour of greenfield sites is in line with national and regional planning policy. Residential zoning in the draft plan is in line with the "Structural Housing Demand at County Level" figures as produced by the ESRI (published 14th December 2020, and the "Housing Supply Target Methodology for Development Planning" (published by the Department of Housing Local Government and Heritage in December 2020. Consideration and application of these modelled figures has been advised through Ministerial direction (under Section 28 guidelines. Residential zoning includes both brownfield and greenfield residential zoned sites.

Adequate supply of development land

The Core Strategy sets out the population and household growth identified for Clare within the lifetime of the proposed Development Plan. There is also a requirement to demonstrate the required land in hectares to support the delivery of this growth. In considering land for zoning the Planning Authority undertook extensive research into the serviceability of the land and in accordance with the requirements of the NPF identified if lands were within tier 1 or tier 2 category in terms of serviced land or serviceable within the lifetime of the plan. After adoption of the proposed Development Plan, a two-year review of the Development Plan, will be complete in line with the requirements of the Planning and Development Act 2000 (as amended.

Brownfield sites

While the Council acknowledge that development of brownfield sites can be challenging, and has made allowances for settlements where constraints may exist, this format of development is crucial to the growth of towns and villages throughout Clare. The Draft Development Plan sets out a number of policies and objectives (CDP 4.2 for the Limerick-Shannon Metropolitan Area, CDP 6.15 more generally to support active land management and the Council have been

proactive in acquiring brownfield and derelict sites to facilitate active land management throughout Clare. Viability assessments are important tools to examine the viability of development, however it is beyond the scope of the draft Development Plan.

Housing Density

In terms of housing unit mix within developments, a mixture of dwelling types will best serve the needs of existing and future households. The delivery of same should therefore be operable for public and private channels. Viability for schemes within urban and rural contexts is therefore an important consideration, but should not be at the expense of ensuring greater balance in dwelling types available. Policy Objective 2 (PO2) in the Clare Housing Strategy (Volume 8 of the draft CDP) recognises that location plays a role in determining what is suitable and appropriate for the type of dwelling mix needed: *"To aim for housing to be available to meet the needs of people of all needs and incomes in County Clare, with an appropriate mix of housing sizes, types and tenures in suitable locations".*

In terms of the planned density of residential development, the Core Strategy has been informed by the consolidation of settlements and the distribution of many land use types within settlement boundaries including a mix of uses in the centre of settlements. This will facilitate reduced travel demand and also increase usage of sustainable modes of transport. The density approach is reflective of the higher order settlements i.e MASP, Key Towns, Service Towns, Small Towns and Large Villages and of the existing built environment.

The Core Strategy applies a graduated and responsive, tailored approach to the quantum of zoned lands having regard to Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages), and circular Letter NRUP 02/2021. Therefore, in addition to higher densities in settlements, consideration has been given to an element of lower density development which does not represent more than 20% of the total planned housing stock in any settlement. In the Core Strategy table, the split between the higher and lower density used is identified for each settlement. All densities referred to are 'net' values.

The densities applied to the Key Town of Ennis, to the Limerick Shannon Metropolitan Area settlements and to the Service Towns, Small Towns and Large Villages - Tier 1 reflect the varying scale of settlements throughout Clare and a tailored approach has been taken, which sets out the highest density requirements in the Key Town and the Limerick Shannon Metropolitan Area settlements, with the density requirements significantly reduced for smaller settlements.

Limerick-Shannon MASP

The Council is committed to working with all relevant stakeholders and bodies to develop cross-boundary and regional-level initiatives, such as the Strategic Integrated Framework Plan for the Shannon Estuary and also the draft Limerick Shannon Metropolitan Area Transport Strategy, which is a cross-county Metropolitan-scale document which sets out the policies and objectives of the National Transport Authority, Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland at a level appropriate to that scale. The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the Limerick Shannon Metropolitan Area (LSMA).

Infrastructure

The Council is committed to working with all the relevant stakeholders to secure the delivery of infrastructure in line with the availability of resources.

Sustainability

The Council is committed to delivering sustainable development through the development plan process and is committed to working with the relevant stakeholders to secure development in line in national and regional planning policy.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/864 –Cahermurphy Wind Farm No II Opposition Group	
Relevant Chapters / Topics	• **Written Statement** • **Renewable Energy Strategy** • **Wind Energy** • **West Clare**

Summary of Issues Raised in Submission

This submission relates to the Renewable Energy Strategy (RES) and the objectives within the Written Statement.

- Welcomes that Volume 1, page 11, highlights the Council's concerns for the communities and the environment.
- Chapter 8, Rural Development and Natural Resources, one of its strategic aims is to assist rural communities with their cultural and natural resources, which again shows concern for the population and environment.
- Though when it comes to the objective CDP8.12, for renewable energy development the above positive statements have been ignored.
- It is noted that it is an objective to update the Wind Energy Strategy but with no indication if this will be a draft that will go out on public consultation.
- Queries the wording used, when it comes to the Renewable Energy Strategy, with some statements unnecessarily excessive and could be open to misleading interpretation.
- Could do more to develop the use of biomass and energy crops and there is also potential for development of solar energy, marine renewables and offshore wind.
- It is noted that no target has been set for offshore wind and that the only difference to the targets set is the addition of targets for solar and removal of any target for offshore wind.
- The figures in Table 4.3, page 46, of RES, contains an error. The sub total for electric should be 1010.7MW and overall total renewable target is therefore 1256.3MW and not 1167.3 as stated.
- In relation to solar energy a map is provided indicating large areas that provide the potential for development and it is worth considering increasing the number of smaller installations thus reducing the need for larger, more intrusive development.
- No reference in the draft strategy to meaningful community consultation.
- While in support of renewable energy the development of energy installations must be balanced against the short and long-term effects on population and environment.
- With the saturation of wind turbines currently existing in West Clare there needs to be a mechanism to prevent overdevelopment.

Chief Executive's Response

I thank the Cahermurphy Wind Farm No II Opposition Group for the submission.

Potential community or environmental impacts arising from the implementation of objective CDP8.12 are captured within the SEA process referenced, where community, economic, energy

security, land usage and ecological and environmental concerns are considered.

A Wind Energy Strategy for County Clare, when published, will form part of the County Development Plan, and therefore will undergo a period of public consultation in line with the requirements set out through the National Planning Framework and the Planning and Development Act 2000 (as amended.

Clare recognises the urgent need to transform to a net-zero carbon society and to phase out fossil fuels and associated greenhouse gas emissions in response to the climate emergency. Furthermore, Clare County Council recognise that with the abundance of natural assets that exist within the county, there is an opportunity to capitalise on the economic, social and environmental benefits, such as job creation and decreased import dependency which renewable energy development can bring.

The scope, targets and management for offshore wind, particularly in relation to realising its potential on the Atlantic Coast, are in the process of being determined at National level.

Clare County Council share the observation that microgeneration technologies represent an area of potential.

The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level mapping at County level. It does not purport to be as accurate or detailed as the research expected for a specific project, and therefore further comment on the specific merits/characteristics of an individual site - for example in relation to proximity to housing, or in relation to ecological sensitivity - is beyond the scope of the Draft RES.

It is noted that Table 4.3 of the draft RES includes an error and this will be corrected accordingly.

Whilst it is noted that solar deployment on residential and commercial premises is a stated aim for the RES, Map 7.2 relates to the potential for a larger-scale solar farm primarily. As noted in chapter 7.2, generally each megawatt (MW) installed requires approximately 1.5 – 2 hectares of land with about 4,000 individual panels. As such, the mapping of indicative sites that can provide and potentially planned for this capacity is an important consideration alongside the potential for micro-solar on roofs.

Clare County Council encourages both developers and host communities to engage in meaningful consultation with one another whenever a new energy project is being considered and aims to promote a dynamic process of dialogue between individuals or groups based on a genuine exchange of views that can help influence decisions and programmes of action that deliver the most acceptable outcomes for all parties.

Chief Executive's Recommendation

I recommend Table 4.3 in the draft Renewable Energy Strategy (Volume 5) be amended to change the Sub Total for Electric from 921.7 MW to 1010.7 MW, and the Overall Total Renewable Target from 1167.3 MW to 1256.3 MW.

Submission No: S2/869 –Trump International Golf Links and Hotel (TIGLH)	
Relevant Chapters / Topics	• **Volume 3D West Clare MD** • **Climate Change** • **Tourism/Recreation**

Summary of Issues Raised in Submission

This submission relates to Trump International Hotel, Doonbeg and relates to coastal erosion, designated sites, tourism and recreation.

Clare Tourism Strategy

The Clare Tourism Strategy 2030 should be incorporated into the CDP so as to strengthen the delivery on its goals and to support the sustainable growth of tourism.

The Vision of Draft CDP

Supports the vision and goals expressed in Section 1.6 of the Volume 1 of the Draft Plan which relate to their existing properties and facilities within the county.

Chapter 9 – Tourism

1. Welcomes and supports policies and objectives in the Draft Plan including Objective CDP9.1 Clare Tourism Strategy 2030, Objective CDP9.4 Tourism Developments and Tourist Facilities, Section 9.2.8 in relation to business tourism, Section 9.2.9 activity and adventure tourism and the emphasis placed on golf in Objective CDP9.8.
2. Supports Section 9.2.3 in relation to tourism developments and tourist facilities and requests that golf be included in the list of facilities required to support the tourism industry.
3. Section 9.2.5 promotes the advantages of Wild Atlantic Way to tourism. There needs to be an emphasis that locations on the Way that are not declared as signature or discovery points need to be promoted and greater emphasis required for areas within the Way.
4. Section 9.2.13 in relation to coastal tourism would ask that golf link courses be added to list of Coastal Tourism Developments.

Chapter 13 – Marine, Coastal & Island Management

1. Suggests additional wording to be added to section 13.4:

   "*Landowners and the relevant agencies will work within existing and prospective reforms to the management of the foreshore and off shore areas to address ongoing natural forces impacting coastal erosion*."

2. Section 13.6 acknowledges the human impacts resulting from coastal developments coupled with impact of global climate change. Request that a specific objective be included as follows:

   "Development Plan Objective: Integrated Coastal Zone Management CDP13 states: 'It is an objective of Clare County Council to encourage greater understanding of the coastal system, to encourage effective monitoring of vulnerable locations and the identification of where, when and what specific remedial action is required."

3. Objective CDP13.13 in relation to the protection of beaches and sand dunes would request

the including of the following objective in respect of dunes under the heading dune protection:

"Protection of Dune Systems 'The County Council recognizes that dune system damage can be caused by overuse and insensitive activities and will seek to limit the extent, frequency, duration, and nature of such harmful activity. Where damage has been caused, the County Council will work with the appropriate State agencies and stakeholders to ensure appropriate rehabilitation, remediation measures and suitable management practices are put in place. The County Council will assist in seeking to ensure that such damage is appropriately repaired so that there is a stable dune system in place to ensure protection of important natural heritage."

4. Supports objective CDP15.9 in relation to natural heritage and infrastructure schemes and suggests an additional objective as follows:

   "Designated Sites - It is acknowledged that the designation of Natura 2000 sites seeks to ensure their protection from natural and human generated forces both direct and indirect and in these circumstances protection will be provided against such naturally occurring and dynamic processes. The County Council will encourage appropriate management of Designated Sites to ensure that degradation and diminution of such environmental and ecological assets does not occur."

5. Supports objective CDP10.10 in relation to physical recreation and active living and suggests an addition as follows:

   "(l) to support the extension and modification of existing sports, social, cultural and leisure facilities where these are consistent with the proper planning and sustainable development of an area."

<u>Heritage Landscapes</u>

1. Objective CDP14.5 would suggest the following be added to this objective:

   "Heritage Landscapes - The County Council will assist statutory agencies and landowners to ensure that these lands of heritage landscapes and high amenity value are secure and protected from natural forces and processes, and change including that which relates to climate, and proposed development as defined by the Planning and Development Act 2000 as amended."

2. Propose the following objective for areas of landscape and amenity value:

   "Areas of Landscape and Amenity Value 'Where there is a landscape of high visual and amenity value that requires to be protected, in particular an area of ecological significance that provides both a habitat resource and an amenity with tourism and leisure potential, the County Council will take such steps as are appropriate to protect those areas and features in consultation with both Statutory Authorities and Landowners."

<u>Access to National Roads</u>

Support the reference in Section 11.2.9.3 (Access onto National Roads) to Hotel and Golf Links, at Doonbeg and any intensification of existing uses there being considered an exception to the presumption of new or enhanced access directly onto national roads on grounds of being of a strategic nature and importance.

Chief Executive's Response

I would like to thank Trump International Golf Links and Hotel for the submission which relates to a number of items as follows:

Clare Tourism Strategy

I am satisfied that the Clare Tourism Strategy 2030 is appropriately supported throughout the Draft Plan, through its policies and objectives and particular in Objective CDP9.1, Chapter 9 of Volume 1, to support the implementation of the *County Clare Tourism Strategy 2030* which establishes a vision for the development of tourism in County Clare and provides for the sustainable and efficient provision and management of Clare's tourism resource.

The Vision of Draft CDP

The support for the vision and goals expressed in the Draft Plan are welcomed.

Chapter 9 – Tourism

1. The support for the various policies and objectives for tourism in Chapter 9, Volume 1, of the Draft Plan is welcome.
2. I consider the request to include 'golf' within Section 9.2.3 Tourism Developments and Tourist Facilities is acceptable.
3. I agree that locations on the Wild Atlantic Way that are not declared as signature or discovery points should be promoted within the Draft Plan.
4. I note the request made in the submission to include reference to golf link courses within the list of Coastal Tourism Developments in Section 9.2.13. However, I do not consider this is necessary having regard to my response to point no. 2 above and my recommendation below to include a reference to golfing in Section 9.2.3.

Chapter 13 – Marine, Coastal & Island Management

1. The management of the coastal zone is the responsibility of various agencies and is managed through a consenting process. It is not within the scope of the county development plan to directly address issues of coastal erosion. Clare County Council has prepared a Strategic Flood Risk Assessment, contained in Volume 10 of this Plan, which has informed the Plan and which identifies areas at risk from flooding and indicates the level of risk associated with each area. I do not consider it is necessary to include the requested objective in the plan.
2. Please refer to my response to point no 1 above. In addition, the Draft Plan contains policies and objectives in relation to awareness, monitoring and management of Coastal Erosion and Flooding including Section 13.14.2 Coastal Protection in County Clare and Objective CDP13.11. I do not consider it is necessary to include the requested objective in the plan.
3. The Draft Plan contains policies and objectives in relation to the protection of sand dunes including Section 13.16 Beaches, Sand Dunes, Reefs and Shorelines and Objective

CDP13.13 Protection of Beaches and Sand Dunes. I am satisfied that these are appropriate, and it is not necessary to include the requested objective in the plan.

4. The Draft Plan contains policies and objectives to protect European Sites including Section 15.2.2 European Sites and 15.2.3 Appropriate Assessment as well as Objective CDP15.3 to afford the highest level of protection to all designated European sites in accordance with the relevant Directives and legislation on such matters and Objective CDP15.4 to implement Article 6(3) and where necessary 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). Therefore, I am satisfied that these are appropriate, and it is not necessary to include the requested objective in the plan.
5. A significant determinant of the health of people is accessibility to local recreational spaces and facilities and there is a need to ensure that when such facilities are provided, they cater for different groups in the community and enable all citizens to be physically active in their daily lives. This could include the extension or modification of existing facilities. Therefore, I consider it acceptable to include additional text in Objective CDP 10.10 as requested.

Heritage Landscapes

1. The Draft Plan contains policies and objectives to protect Heritage Landscapes including 14.3.2.3 Heritage Landscapes and Objective CDP14.5 as well as policies and objectives in relation to potential impacts on heritage landscapes such as climate change, coastal erosion, flooding etc. I am satisfied that the protection of Heritage Landscapes is appropriately addressed in the Draft Plan. I would note that it is not possible for the Council or any statutory agency to ensure protection from natural forces and processes.
2. Chapter 14 of the Draft Plan contains policies and objectives to protect landscapes of high visual and amenity value including Heritage Landscapes, Seascape Character Areas and views and prospects. I am therefore satisfied that the protection of landscapes of high visual and amenity value are appropriately addressed in the Draft Plan.

Access to National Roads

I note the support for the reference in Section 11.2.9.3 (Access onto National Roads) to Hotel and Golf Links, at Doonbeg and any intensification of existing uses there being considered an exception to the presumption of new or enhanced access directly onto national roads on grounds of being of a strategic nature and importance.

Chief Executive's Recommendation

I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029:

Under 9.2.3 Tourism Developments and Tourist Facilities in Chapter 9, Volume 1- amend text to read:

9.2.3 Tourism Developments and Tourist Facilities

It is recognised that infrastructure development must meet the needs of both the resident and visitor populations in order to ensure that County Clare continues to be a high quality place in

which to live, work and visit. A wide range of facilities are required to support the tourism industry and to attract visitors to the County. Many of these facilities can also be used by local residents. These include visitor attractions/interpretive centres, wellness and self-development facilities, equestrian, water-sports and outdoor adventure activities, facilities for boat rental and inland cruising, golfing and family amenities such as playgrounds and woodland walks. In addition, long-term projects such as the Wild Atlantic Way are essential to the economic growth derived from the tourism offering in the County. The Council will promote the development of tourism in a manner that is compatible with the conservation and enhancement of the environment.

Objective CDP9.6 Tourism Corridors in Chapter 9, Volume 1 – amend point a) to read:

a)To work with all relevant stakeholders to ensure the sustainable improvement and expansion of tourist services, infrastructure, visitor management and interpretative information and transport networks and amenities for Ireland's Hidden Heartlands, the Shannon Estuary Way, at the identified Wild Atlantic Way Signature Points and Discovery Points as well as at appropriate locations along this route, and for all of the key tourism corridors in the County subject to robust feasibility studies to reduce impacts on the environment and to required appraisal, planning and environmental assessment processes;

Objective CDP10.10 Physical Recreation and Active Living in Chapter 10, Volume 1 – include new point to read:

l) To support the extension and modification of existing sports, social, cultural and leisure facilities where these are consistent with the proper planning and sustainable development of an area.

Submission No: S2/874 –RWE Renewables Ireland Ltd.

Relevant Chapters / Topics

- **Renewable Energy**

Summary of Issues Raised in Submission

The submission outlines the importance of the Council providing opportunities to develop renewable energy generation and the importance of accelerating the clean energy transition and increasing Europe's energy independence, given the volatility of the energy market and the geopolitical nature of the supply chain.

- Clare County Council and all Local Authorities should be cautious when considering the designation of areas for renewable energy development going forward, so as not to constrain any areas which may have renewable energy potential, particularly for wind generation.
- Increasing the areas designated as 'Strategic Sites' 'Acceptable in Principle' and 'Open to Consideration' should be considered by Clare County Council in the context of removing wind speed and grid capacity as a limiting factor as Clare County Council agrees to the maintenance, development and upgrading of the electricity grid infrastructure.
- RWE is aware of a recent planning application near Miltown Malbay where an 8-turbine development was refused planning permission although being zoned in an area as Strategic in the Clare Wind Energy Strategy. RWE questions how a strategic area remains strategic despite the mentioned refusal.
- RWE urges Clare County Council to consider the opportunities existing with the development of renewable energy technologies such as onshore wind in the county.
- Further clarity should be provided to developers and decision makers on the sensitivity of the Scenic Routes in a particular location vis a vis wind farm development so that a plan-led approach can be applied to development, while protecting biodiversity and ecology of a location.
- RWE urge Clare County Council to draft a new Wind Energy Strategy in response to significant delays in the publication of the Wind Energy Development Guidelines since 2019.

Chief Executive's Response

I thank RWE Renewables Ireland Ltd. for the submission.

The analysis carried out for the Draft RES follows the SEAI LARES methodology, which presents a sieve analysis strategy which starts with the maximum resource possible and concludes with the presently accessible/competitive resource, and as a result is concerned with high-level mapping at County level. It does not purport to be as accurate or detailed as the research expected for a specific project, and therefore further comment on the specific merits/characteristics of an individual site is beyond the scope of the Draft RES.

While it is acknowledged that County Clare has an abundance of resources that have the potential to provide many times its actual energy needs from renewable sources, it is important that the adoption of renewable technologies is aligned with a balanced, sustainable and plan-led approach. Furthermore, targets established in the RES should not be interpreted as a ceiling, and

in the event that significant progress is being made towards the overall goal of a low carbon economy through renewable energy generation, any further projects, and site designation required to realise them, should not be delayed or influenced by the fact they may result in any of the established targets being exceeded.

It is not appropriate to discuss individual planning applications within the context of the plan preparation process. Every planning application is considered within the policy objectives of the Development Plan in place at the time of a proposal being submitted to the Planning Authority. The Wind Energy Strategy (Volume 6 of the draft Plan) identifies areas which are "Acceptable in Principle" and "Strategic Areas" however development proposals put forward in these areas do not guaranteed a successful outcome as all proposals are dealt with on a case by case basis through the development management process.

Having regard for the County's significant available renewable resources, Clare County Council will seek to take a lead role in respect of renewable energy technology to assist in meeting national, regional and County targets in energy consumption and CO_2 reduction.

In accordance with the requirements of the Department of Environment, Community and Local Government as set out in Circular PL20-13, the current Clare Wind Energy Strategy 2011-2017 is not being reviewed as part of the preparation of this draft Plan. Within the draft Plan, CDP11.47 Renewable Energy and the draft Renewable Energy Strategy Section 6.6, there is a commitment made through policy support to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, upon the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

Chief Executive's Recommendation

I recommend that there is no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/875 –Greensource	
Relevant Chapters / Topics	• **Volume 5 Clare Renewable Energy Strategy**

Summary of Issues Raised in Submission

This submission relates to Clare Renewable Energy Strategy, Volume 5 of the Draft.

- Fully supportive of the development of renewable energy projects.
- Welcomes that the Plan seeks to achieve regional balance between areas and accept that some areas are not suitable for wind farm development.
- The economic activity associated with renewable energy projects is vital for redressing the trend of de-population, leading to more sustainable and vibrant communities.
- Fully supportive of the Clare Wind Energy Strategy and supports the proposed Plan in relation to renewable energy and transition to a low carbon society.

Chief Executive's Response

I thank Greensource for the submission and acknowledge Greensource's support for the Draft Clare County Development Plan 2023 - 2029 in relation to renewable energy and the transition to a low carbon society.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/883 –Bernadette Kiely	
Relevant Chapters / Topics	• **Renewable Energy Strategy** • **Wind Energy Strategy** • **LNDR**

Summary of Issues Raised in Submission

This submission relates to the area of Ballycannon North.

- This area has been designated a strategic area for windfarms.
- The density of housing development should have a bearing on location of any wind turbines.
- Requests that consideration be given to moving the area designated for turbines further north into a far less populated area.
- Residential development is likely to expand further in light of the Northern Distributor Road.
- Wind energy is worth harnessing but need to look at long term impacts.

Chief Executive's Response

I thank Bernadette Kiely for the submission.

The Wind Energy Strategy is included as Volume 6 of the draft Development Plan and there is a commitment through the inclusion of a specific objective in both the draft Renewable Energy Strategy in Section 6.6 Policy Provision and in Volume 1, objective CDP 11.47 Renewable Energy of the draft Plan to prepare a new Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. The preparation of a new Wind Energy Strategy will involve a review of the exiting WES in developing future policy for the county.

It is noted that the proposed Limerick Northern Distributor Road would be a significant piece of road infrastructure which would create a connection between the N18 and the M7. It is an objective in the draft Plan to support the delivery of the LNDR as a critical piece of strategic road infrastructure that would facilitate improved access to the University of Limerick for traffic travelling from within the county and beyond, as well as to the Clare settlements of Athlunkard, Parteen etc. which currently experience significant traffic issues due to an inadequacy in the existing capacity of the road network to cater for the high volumes of traffic. The LNDR would serve these communities and allow for a plan-led approach to their future growth.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/887 –Sarah Halpin	
Relevant Chapters / Topics	• **Architectural, Archaeological & Cultural Heritage** • **Record of Protected Structures** • **Housing Strategy**

Summary of Issues Raised in Submission

- Protective status of stone roofs in Co. Clare and vernacular architecture in general.
- Consider Doonagore for inclusion as ACA, an area with a large amount of flag-stoned buildings.
- Any new development on the site of any of surviving flagstone roofed houses should respect the existing nature of the buildings. Suggested inclusion wording of '*the reuse of vernacular and historic buildings is a central element to the continued preservation of the county's built heritage and also important to sustainability. In assessing applications to demolish older and vernacular buildings which are not protected, the Planning Authority will seek the retention and reuse of buildings/structures of historic, architectural, cultural, artistic and/or local interest which make a positive contribution to character and identity of areas including those retaining their locally quarried distinctive roofs'*. to CPD 16.3.3
- Other inclusions relate to adding to the requirements of a planning application with relation to vernacular structures such as:

- Measures are taken to support and protect the building from collapse prior to, and during, the construction works.
- Where it is proposed to increase the size of the vernacular dwelling by extending it, the design, scale, footprint and materials used for the extension should be in keeping with or sympathetic to the existing dwelling and its setting. The Council will consider the re-use of vernacular outbuildings in extending vernacular dwellings.
- Detailed measured survey, photographic record and written analysis should be a requirement for developments affecting vernacular buildings.

- The possible use of former Shannon Heritage sites (Bunratty, Knappogue) for traditional building skills works shops, like Drimnagh Castle in Dublin.
- The creation of a guide for owners of vernacular dwellings.
- For the organising of events to promote awareness of vernacular architecture through interlinking with Architecture on the Edge and the Irish Architecture Foundation. Call for Open-House type event in Co. Clare.
- A construction Summer School, showcasing traditional skills workshops, organised bi-annually.
- Targeted grants scheme run by Clare County Council, specific to vernacular structures, similar to Donegal thatching grant.
- The implementation of Actions 10-12 of the National Strategy for Vernacular Heritage 2021, facilitating continued training in vernacular skills.

Chief Executive's Response

It is agreed that the status of vernacular structures in Co. Clare should be strengthened, with particular focus on the stone roofs of Co. Clare. It is accepted that additional information be included with planning applications affecting vernacular structures, such as survey drawings, photographs and a written assessment of the works and acknowledged that traditional building skills workshops, summer schools, open days should be encouraged and supported as much as possible. The location of a permanent training facility for traditional construction skills located in Co. Clare should also be identified and encouraged. The allocation of a grant for vernacular structures in County Clare should also be considered, with particular focus on the stone roofs of Co. Clare.

It is not considered appropriate for Doonagore to be added as an ACA, as I consider my proposed amendment to the draft Plan as set out in my recommendation will offer adequate protection. Where a cluster of stone roofed structures are identified these could be considered for inclusion in a future review of the RPS. The Architectural Conservation Officer and Heritage Officer in the County Council will be developing guidelines for works to vernacular structures within Co. Clare and explore and develop opportunities to promote awareness of vernacular architecture.

Chief Executive's Recommendation

I recommend that the following amendment is made to the Draft Clare County Development Plan 2023-2029 as follows:

- Volume 1 Written Statement, Chapter 16, Architectural, Archaeological and Cultural Heritage, section 16.3.3 Vernacular Heritage – include additional wording as follows:

The form, scale, indigenous materials (such as use of limestone/sandstone masonry, Moher/Killaloe slate for roofs and so on) and orientation of local vernacular buildings often come to represent the distinctive character of a particular area, and whilst many may not merit specific inclusion on the Record of Protected Structures, they do however make a positive contribution to that character. The Council recognises that many of these buildings are homes and workplaces that may need to evolve to facilitate ongoing use, and to address the loss of the existing built vernacular the Council will encourage the appropriate re-use and sensitive redevelopment of vernacular buildings rather than their replacement or dereliction where practicable.

- Volume 1 Written Statement, Chapter 16, Architectural, Archaeological and Cultural Heritage, objective CDP 16.1 Architectural Heritage – include additional part c) as follows:

"It is an objective of Clare County Council:

a) To ensure the protection of the architectural heritage of County Clare through the identification of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding of historic gardens, and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the County; and

b) To ensure that the archaeological and architectural heritage of the County is not damaged either through direct destruction or by unsympathetic developments.

c) To support and promote architectural vernacular skills training and facilities in the County."

Submission No: S2/889 –Southern Region Waste Management Office	
Relevant Chapters / Topics	• **Volume 1 Written Statement** • **Waste Management**

Summary of Issues Raised in Submission

This submission is in relation to waste management and the main points are as follows:

- Acknowledges the many areas of the draft where reference is made to the Circular Economy. Requests that reference is also made within the Introductory Chapter 1 as follows:

  "Clare County Council plays a fundamental role in the transition from a linear to a circular economy, through being responsible for key policies in public services that affect citizens' wellbeing, economic growth and environmental quality. This plan will foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible."

Waste Management

- The current Southern Region Waste Management Plan 2015-2021 will be replaced by the National Waste Management Plan for a Circular Economy which will be out on public consultation later in year.
- CDP 11.35(a) – suggests reference is made here to the more recent Circular Economy Action Plan launched in 2020 'A New Circular Economy Action Plan for a Cleaner More Competitive Europe'.
- CDP 11.35(f) and CDP11.38 (a) – to note recently published guidelines 'Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects'.
- Section 11.5.2 Waste Transfer & Recovery suggests inclusion of following:

  'Clare County Council will facilitate the sustainable provision of additional waste facilities at appropriate locations in accordance with the *Waste Management Infrastructure Guidance for Siting Waste Management Facilities.* This Guidance will be included in the upcoming *National Waste Management Plan for a Circular Economy* (NWMPCE), which will replace the *Southern Region Waste Management Plan 2015-2021* and the regional waste management plans for the other two regions.'

- Section 11.5.4 Construction & Demolition Waste – CDP 11.38 as with CDP 11.35(f) to note the guidelines.

Chief Executive's Response

I thank the Southern Region Waste Management Office for the submission.

I consider that promoting a Circular Economy in order to optimise the management of waste and to generally contribute to economic growth, is a fundamental aim underlying the development plan, and having regard to the European and national policy approaches to this subject, I consider

it appropriate to include amendments and additions to the draft Plan that will give greater clarity and prominence.

Chief Executive's Recommendation

Amend Volume 1, Chapter 1, Section 1.6 'Goals', as follows:

> Goal XX: A County that plays a fundamental role in the transition from a linear to a circular economy, through being responsible for key policies in public services that affect citizens' wellbeing, economic growth and environmental quality, and by fostering the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible.

Amend Volume 1, Chapter 11, Section 11.1, as follows:

> 11.1 Strategic Aims
>
> This Chapter presents the objectives for the provision of physical infrastructure for the existing and future population of County Clare, in accordance with the overall vision of the Plan. These objectives are based on the following strategic aims:
>
> - To provide a safe, integrated, efficient and sustainable network of transport to serve the needs of people, goods and services travelling to and within County Clare;
> - To promote and encourage the use of alternative sustainable modes of transport;
> - To safeguard the strategic transport function of the motorway and national road network and associated junctions in order to cater for the safe and efficient movement of inter-urban and inter-regional traffic;
> - To protect, improve and conserve the County's water resources to meet the requirements of the *River Basin Management Plan for Ireland 2018-2021* and any subsequent revisions or updates to this Plan;
> - To encourage and promote the benefits of the re-use and recycling of waste and to enable the provision of appropriate waste management facilities throughout the County in accordance with the upcoming *National Waste Management Plan for a Circular Economy* which will be the successor to the *Southern Region Waste Management Plan 2015-2021;*
> - To reduce County Clare's dependence on imported fuels and to provide alternative energy sources by harnessing the County's potential for renewable energy sources;
> - To ensure security of energy supply throughout the County; and
> - To promote and facilitate the provision and continued development of broadband and ICT infrastructure to further enhance social and economic development, particularly in the more peripheral areas of County Clare.

Amend Volume 1, Chapter 11, Section 11.5.1, as follows:

> 11.5.1 Waste Management Plans

Clare County Council, in conjunction with the other local authorities in the Southern Region, has a role in the implementation of *A Waste Action Plan for a Circular Economy – Ireland's National Waste Policy 2020-2025* and the *Southern Region Waste Management Plan 2015-2021*. The Council will also have a role in implementing the upcoming *National Waste Management Plan for a Circular Economy* (NWMPCE), which will be the successor to the *Southern Region Waste Management Plan.*

The strategic vision of the *Southern Region Waste Management Plan* is to rethink our approach to managing waste, by viewing our waste streams as valuable material resources. The Plan provides a framework for the prevention and management of waste in a safe and sustainable manner. The Plan targets are:

- 1% reduction in the quantity of household waste generated per capita over the period of the Plan;
- Achieve a recycling rate of 50% of managed municipal waste by 2020; and
- Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices.

The *Regional Spatial and Economic Strategy for the Southern Region*, 2020 echoes these sentiments and aims to move away from the traditional unsustainable linear model where resources are consumed and high waste volumes are generated which are then sent to be processed as waste. As at national level, policy is now focused on building a circular economy.

The European Commission's New Circular Economy Plan 'A New Circular Economy Action Plan for a Cleaner More Competitive Europe' was launched in 2020 and forms one of the main blocks of the European Green Deal.

Through the development of a circular waste economy, there will be opportunities for enterprise and employment. Clare County Council will support and promote circular economy principles prioritising prevention, reuse, recycling, and recovery, to support a healthy environment, economy and society. Clare County Council is also committed to implementing the provisions of the framework set out in the *Southern Region Waste Management Plan*, and to implementing the upcoming *National Waste Management Plan for a Circular Economy* (NWMPCE), which will be the successor to the *Southern Region Waste Management Plan.*

Amend Volume 1, Chapter 11, CDP 11.35 Waste Management as follows:

Development Plan Objective: **Waste Management**	
CDP11.35	It is an objective of Clare County Council: a) To support and facilitate the implementation of the ~~EU *Action Plan for the Circular Economy – 'Closing the Loop'*~~, EU Circular Economy Action Plan 'A New Circular Economy Action Plan for a Cleaner More Competitive Europe' (2020), the EU *Raw Material Initiative*, *A Waste Action Plan for a Circular Economy – Ireland's National Waste Policy 2020-*

		2025 and the *Southern Region Waste Management Plan 2015-2021;* b) To support and promote circular economy principles prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society; c) To encourage and facilitate the development of new options and technological advances in relation to waste management; d) To support the development of waste recycling facilities at appropriate locations in County Clare as a means of facilitating a reduction in the quantity of waste that goes to landfill disposal sites; e) To promote environmental awareness measures and action programmes to ensure good environmental awareness and practices, the recycling of waste, water management, and energy conservation; f) To have regard to the ~~*Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects*, July 2006 (and any subsequent guidelines)~~ *'Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects' (EPA 2021) and any subsequent guidelines* in the management of waste from construction and demolition projects and to require the submission of a Construction and Demolition Waste Management Plan for projects in excess of the following thresholds: • New residential developments of 10 houses or more, • Other new developments, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,250m^2, • Demolition/renovation/refurbishment projects generating in excess of 100m^3 in volume of construction and demolition waste, • Civil engineering projects producing in excess of 500m^3 of waste, excluding waste materials used for development works on the site. The Council may also require the submission of Construction and Demolition Waste Management Plans for other developments, and this will be managed through the pre-planning consultation and planning application processes; g) To require proposals for brownfield regeneration in strategic locations to be accompanied by a site risk	

	assessment and a clear waste plan for any wastes arising, including consideration of hazardous or contaminated material; and h) To support and facilitate the repurposing of previous landfill sites and where appropriate their reuse for community or recreational purposes.

Amend Volume 1, Chapter 11, Section 11.5.2, as follows:

11.5.2 Waste Transfer and Recovery

Waste transfer facilities/material recovery facilities are essential infrastructure to support the recycling of waste. In the assessment of applications for waste transfer facilities/material recovery facilities, the following site characteristics are preferable:

- Within or as near as possible (within 2km) to the defined Metropolitan Town, Key Town or Service Town as defined in the Settlement Hierarchy;
- Where practical, on the national or regional road network and where traffic considerations are acceptable;
- In a central location within their general catchment in order to minimise road hauls;
- If possible, in an area close/proximate to existing business operations;
- Where impacts on local amenities can be minimised; and
- Where the natural features (for example, geology, hydrology) minimise pollution risks.

Clare County Council will facilitate the sustainable provision of additional waste facilities at appropriate locations in accordance with the *Waste Management Infrastructure Guidance for Siting Waste Management Facilities.* This Guidance will be included in the upcoming *National Waste Management Plan for a Circular Economy* (NWMPCE), which will replace the *Southern Region Waste Management Plan 2015-2021* and the regional waste management plans for the other two regions.

Amend Volume 1, Chapter 11, CDP 11.38 Construction and Demolition Waste as follows:

Development Plan Objective: **Construction and Demolition Waste**	
CDP11.38	It is an objective of Clare County Council: a) To require that a C&D Waste Management Plan is prepared by the developer having regard to the ~~*Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects*, July 2006 (and any subsequent guidelines)~~ *'Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects' (EPA 2021) and any subsequent guidelines* for new construction or demolition projects and to require that where appropriate the maximum amount of waste material generated on site is reused and recycled;

		b) To promote the production and reuse of aggregates from C&D waste and their use in construction projects in the Region; and c) To encourage the development of C&D waste recycling facilities at suitable sites, including quarries, subject to normal planning and environmental considerations.	

Submission No: S2/897 –Coakley O'Neill Town Planning on behalf of Circle K Ireland Energy Group Limited	
Relevant Chapters / Topics	• Volume 7 Clare Retail Strategy • Policies & Objectives

Summary of Issues Raised in Submission

This submission is in relation to general policies with regard to service station development.

The submission recommends that in order to comply with the requirements of Section 12 of the Planning and Development Act, 2000 (as amended) Objective CDP7.21 should be amended to more accurately reflect the requirements of the 'Retail Planning Guidelines for Planning Authorities (2012)'.

The submission identifies that, as currently worded, Objective CDP7.21 allows for the consideration of shops associated with petrol filling stations with a floor space of up to 100m² (net) only. It recommends that Objective CDP7.21 should be amended to state that "[petrol filling station] development incorporating in excess of 100m² net retail sales area is acceptable in principle, subject to sequential testing and other normal planning and development considerations" in order to be consistent with the Retail Planning Guidelines.

The submission also requests the consideration of the following further points:

I. *"Recognition that the nature of the service station market has evolved considerably and acceptance of their various forms and locations.*
II. *Support for the important local service function performed by urban stations and the sustainability of those established in residential neighbourhoods.*
III. *Acknowledgement of the expectations and requirements of the modern consumer in determining appropriate policies for this type of retailing".*

Chief Executive's Response

I wish to thank Coakley O'Neill Town Planning for the submission, made on behalf of Circle K Ireland Energy Group Limited and address the issues raised as follows:

It is acknowledged that Section 4.11.9 (Retailing and Motor Fuel Stations) of the 'Retail Planning Guidelines for Planning Authorities (2012)' makes provision for petrol filling station proposals incorporating more than 100m2 net retail floorspace to be permitted subject to compliance with the sequential approach to development which is necessary to ensure that "*the shopping element of the station would not seriously undermine the approach to retail development in the development plan."*

In order to ensure that the Development Plan is fully consistent with the 'Retail Planning Guidelines for Planning Authorities (2012)' it is appropriate that recommended that Objective CDP7.21 is re-worded.

With regards to the further points I-III noted above, it is not appropriate for the Draft Development Plan to single out petrol filling station retail formats for protection or enhancement as suggested. Such an approach would be contrary to the overarching objective of the 'Retail

Planning Guidelines' to enhance the vitality and viability of city and town centres by applying a sequential approach to retail development. In accordance with the Retail Planning Guidelines, the Draft Development Plan encourages the retention and enhancement of existing retail services within designated centres regardless of format (refer to Objectives CDP7.3 - CDP7.9). In addition, Section 7.3.6 (Small Villages) of the Draft Development Plan recognizes the important retail service function fulfilled by petrol filling stations in existing villages and supports the enhancement of such facilities. No further amendments are considered to be necessary in this respect.

Chief Executive's Recommendation

In order to ensure that the Development Plan is fully consistent with the 'Retail Planning Guidelines for Planning Authorities (2012)' it is recommended that Objective CDP7.21 is re-worded to explicitly confirm that petrol filling station proposals incorporating more than 100m2 (net) retail floorspace will be considered in line with the sequential approach as well as normal planning and environmental considerations.

Amend Volume 1 Chapter 7 Objective CDP7.21 'Petrol Filling Stations' as follows:

"To consider development proposals for petrol filling stations, and associated shops with a floor space ~~no greater than~~ up to 100m2 (net), on their individual merits, subject to normal planning and environmental considerations ~~traffic impact considerations and the location, health and scale of existing retail services in the area~~. Where permission is sought for associated shops with a floorspace is in excess of 100m² (net), the sequential approach shall also be applied."

Submission No: S2/900 –Paul Keane	
Relevant Chapters / Topics	• **Wind Energy** • **Land Use Zoning** • **Shannon Municipal District**

Summary of Issues Raised in Submission

- This submission relates to wind energy development in the areas of Woodcock Hill, Gallows Hill and Ballycar Hill.
- Requests that these areas are dezoned for wind farm development.
- To refuse applications for wind farms under current Plan.
- To put local needs ahead of profit.
- To protect the habitat and wildlife and learn from past disaster (eg Derrybrien, Meenbog).
- Acknowledge 0 risk is only acceptable risk in relation to Landslides and aviation safety.
- The Government strategy for Offshore Wind energy should be first priority.
- To ensure Woodcock Hill Bog, the hen harrier and other species are protected.
- Recognise the impact on local residents due to noise and shadow flicker.

Chief Executive's Response

I thank Paul Keane for his submission.

It is not within the remit of the Draft Renewable Energy Strategy (RES) or draft County Development Plan to comment on individual planning applications. The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level strategic mapping for the County and is not intended to provide the same degree of accuracy or detail as the research expected for a site-specific project, and therefore comment on the specific merits/characteristics of an individual site, for example in relation to proximity to housing, or in relation to ecological sensitivity, is beyond the scope of the draft RES.

I acknowledge the concerns over potential landslides and aviation safety associated with windfarm development. The development management process requires the highest standards of community and environmental protection. General safeguards on amenity and environmental protection are included in Section 17 of the draft RES.

The draft Plan also includes objectives CDP 3.1 Appropriate Assessment (AA), Strategic Environmental Assessment (SEA) and Strategic Flood Risk Assessment (SFRA) and CDP 11.47 Renewable Energy outline the requirement for the draft CDP and associated supporting volumes (including Volume 5, Clare Renewable Energy Strategy) to comply with all relevant EU Directives including the Habitats Directive, Birds Directive and the Water Framework Directive and all relevant transposing national legislation. Furthermore, it is an objective of Clare County Council to support the sustainable development of renewable wind energy at appropriate locations, and in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment, and protected habitats and species, and to assess proposals having regard to

associated SEA and AA.

The landscape, topography and wind energy resource in this part of Ireland makes wind farm development a sensible approach for the county. In recognition of the climate and biodiversity crises currently facing Ireland and global populations, private sector investment is critical to achieving the ambitious targets set forth. Clare County Council seek to create an environment which encourages collaboration between private companies, public sector, education sector and local communities which will promote research, development and innovation, and which will create new opportunities for the people of Clare whilst supporting a just transition to a net-zero emissions environment.

The Maritime Area Planning Act 2021 (MAP Act) was signed into law on the 23rd of December 2021. This legislation represents the biggest reform of marine governance since the foundation of the State and demonstrates the Government's commitment to prioritising the strategy for Offshore Wind Energy in terms of reform. The Act establishes a comprehensive and coherent marine planning system including the establishment of the Maritime Area Regulatory Authority (MARA) a dedicated agency to undertake certain consenting and enforcement functions in the new regime. It is hoped that MARA will become operational in Q1 of 2023 at which point it will be possible to commence consenting of Offshore Renewable Energy projects under this new regime. Clare County Council have actively inputted to, supported and promoted the development of the MAP Act and the establishment of MARA and will continue to ensure it is operational in 2023.

In the draft Plan there is a commitment through the inclusion of a specific objective to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/903 –Limerick Flying Club	
Relevant Chapters / Topics	• **Wind Energy** • **Land Use Zoning** • **Shannon Municipal District**

Summary of Issues Raised in Submission

This submission relates to an area west of Ardnacrusha and Strategic Areas and Acceptable in Principle Areas in relation to Wind Energy.

- Concerns regarding the disruption from wind turbines, due to size and height, to the airmass at Coonagh Aerodrome which is about 4km south of the southern reaches of the proposed Strategic Area.
- Concerns if prevailing winds are westerly or northerly as it could impact on these light aircrafts/helicopters particularly when close to Ardnacrusha and Parteen.
- The most expedient route is through the gap north of the city following Ardnacrusha headrace, passing over Parteen in close proximity to Meelick and Kilkishen all of which are extremely close to the proposed Strategic Area for wind energy.
- Suggests consultation with the Irish Aviation Authority and relevant expertise in this matter.

Chief Executive's Response

I thank the Limerick Flying Club for the submission.

The Wind Energy Strategy is included as Volume 6 of the draft Development Plan and there is a commitment through the inclusion of a specific objective in both the draft Renewable Energy Strategy in Section 6.6 Policy Provision and in Volume 1, objective CDP 11.47 Renewable Energy of the draft Plan to prepare a new Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. The preparation of a new Wind Energy Strategy will involve a review of the exiting WES in developing future policy for the county.

Applications for wind energy developments are referred to the Irish Aviation Authority as part of the development management process.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/910 –Helen Downes on behalf of Shannon Chamber of Commerce	
Relevant Chapters / Topics	• **3B Shannon MD**

Summary of Issues Raised in Submission

This submission relates to the Shannon area and the Shannon Masterplan.

- Retail and community growth should not be confined to Town Centre.
- To review the zoning of land in/around Shannon Town with a view to creating a link between M18 and N19.
- For a varied residential and retail mix in town.
- For a centrally located area for civic and arts centre to draw people to the town and boost local business.
- Mix of retail and entertainment needs to be improved.
- Consideration needs to be given to creating an identity for town.
- Commitment in the Plan that the Shannon Town Masterplan will be delivered and request the appointment of a full time Project Director with its implementation.

Chief Executive's Response

I wish to thank Helen Downes on behalf of Shannon Chamber of Commerce for the submission and welcome their support for the vision for Shannon as set out in Volume 3B Shannon Municipal District Settlement Plans of the draft Clare County Development Plan 2023 – 2029.

The Final Shannon Town Masterplan has now been published since the preparation of the Draft Plan. References to the Masterplan within the Settlement Statement for Shannon will now be updated and it should be a Strategic Goal of the Plan to support the implementation of the Masterplan. The masterplan will in turn help inform the preparation of the forthcoming Shannon and Environs LAP.

The Council cannot give a commitment that the Masterplan will be delivered on and rolled out in its entirety to definitive timelines as actions are dependant on 3rd party, property issues, funding and continuous risk assessment.

The Council has no plans to appoint a dedicated and full-time Project Director.

Chief Executive's Recommendation

Strategic Goals

The above vision can be achieved through a number of strategic goals as follows:

To promote the role of Shannon within the Limerick Shannon Metropolitan Area in accordance with the Metropolitan Area Strategic Plan

1. To foster a strong identity and sense of place;

2. To proactively pursue the continued growth of Shannon as a centre of industrial and business excellence and as a globally recognised centre of excellence for software engineering, aviation and logistics talent.
3. To support the continued development of Shannon International Airport as a national and international driver of economic, social and tourism growth;
4. To secure a vibrant, viable and distinct town centre;
5. To deliver quality housing and sustainable communities;
6. To facilitate community, social, cultural and recreational development;
7. To actively pursue a low carbon strategy for the town and surrounding areas;
8. To protect and enhance the natural and built environment;
9. To develop Shannon as a visitor destination;
10. To deliver an integrated and coherent green infrastructure strategy, encouraging walking, cycling and recreation;
11. To maximise infrastructural resources, including the Shannon Estuary.
12. To support the implementation of the Shannon Town Centre Masterplan

Vibrant and Viable Town Centre

~~A~~ Shannon Town Centre Masterplan sets out a clear strategic framework for the renewed development of Shannon Town Centre, providing for a shared vision for its future development. ~~is currently in preparation for the town centre with t~~The aim of the Masterplan is to develop a distinct shopping character to increase Shannon's attraction and to deliver a vibrant and viable town centre for Shannon with a range of retail, service, recreation and cultural facilities. Opportunities exist for redevelopment of the existing town centre. The Masterplan will facilitate the delivery of a sustainable urban designed town centre and will inform the forthcoming Local Area Plan.

Submission No: S2/ 916 –Margot Healy	
Relevant Chapters / Topics	• **Sixmilebridge** • **Transport**

Summary of Issues Raised in Submission

This submission relates to the town of Sixmilebridge, which is described in the submission as a commuter town, with reference to Limerick, Shannon and Ennis.

- The Sixmilebridge Accessibility Audit asked respondents to list things that reduce the quality of life and poor public transport was near the top of the list;
- Census 2016 Results showed private car journeys accounting for c. 70% of all work/college/school trips;
- The Draft Plan's transport objectives do not directly address the issue of public transport other than to propose a link, via Bunratty, from the station to Shannon Airport.
- While the reopening of the train station has improved transport links the frequency and cost remains a problem.
- Providing a shuttle bus or cycle routes to Bunratty, with a secure bike storage area, would help to improve services.
- Works undertaken in Sixmilebridge to improve pavements, parking and pedestrian crossings have improved the visual amenity and public safety of the area. Further improvement could be achieved through additional traffic calming measures.

Chief Executive's Response

I wish to thank Margot Healy for the submission and address the issues raised as follows:

Transportation, Active Travel and Connectivity are discussed in the Sixmilebridge Settlement Plan which is contained within Volume 3B 'Shannon Municipal District Settlement Plans' of the draft CDP. The following text is contained within the draft CDP:

> Sixmilebridge is situated within the Limerick Shannon Metropolitan Area and forms part of the study area for the draft Limerick Shannon Metropolitan Area Transport Strategy 2040. The strategy seeks to deliver a high quality, accessible integrated and more sustainable transport network that supports the role of the Limerick-Shannon Metropolitan Area as the major growth engine of the Mid-West Region, an internationally competitive European city region and main international entry point to the Atlantic Corridor. Sixmilebridge is well serviced by public transport with a regular Bus Eireann Service and the Limerick Galway rail line and station. Given the high level of out-commuting experienced in the Sixmilebridge, walking should be promoted as part of linked trips with public transport. The pedestrian environment around bus stops and the train station should be improved. This will be undertaken in tandem with land use proposals that consolidate the town centre and strengthen its sense of place and function.

Transport Objectives

• To support the delivery of necessary infrastructure within Sixmilebridge as set out in the draft LSMATS;

• To facilitate the provision of a link road (consistent with the Design Manual for Urban Roads and Streets (DMURS)) following the undertaking of traffic surveys on the approach roads to Sixmilebridge and in the town centre;

• To secure the provision of a dedicated shuttle bus service between Sixmilebridge railway station and Shannon International Airport (via Bunratty);

• To improve active travel and pedestrian and cycle movement and linkages throughout the town, with particular attention to pedestrian and cycle movements over the bridge, within the central area and connecting existing and future developments to the town centre and the railway station;

• To proactively pursue the provision of additional carparking in or adjoining Sixmilebridge town centre;

• To maximise opportunities for the town provided by the rail link to Limerick, Ennis and Galway;

• To explore improved cycle connectivity between Sixmilebridge and Bunratty;

• To undertake a review of the existing Accessibility Audit for the town.

I consider that the objectives set out in the draft CDP regarding transport in Sixmilebridge are comprehensive. In particular, the objective to support the delivery of necessary infrastructure within Sixmilebridge as set out in the draft LSMATS is important since the infrastructural interventions set out in the draft LSMATS for implementation in Sixmilebridge will facilitate significant improvements to the capacity, frequency, coverage and speed of public transport services.

For example, it is stated in Section 10.9 of the document that 'Bus priority between Sixmilebridge train station and Shannon, for example, could be considered'. This is in the context of the planned direct bus route from Sixmilebridge to Shannon that is shown in Chapter 10 'Bus' of draft LSMATS and will not be routed through Bunratty. The bus service will provide opportunities to interchange in Shannon to other bus services linking Shannon to other destinations within the metropolitan area and further afield.

Additionally, Chapter 11 of the draft LSMATS provides for significant improvements to the rail network in the Limerick Shannon Metropolitan Area. Measure RL3 'Limerick Commuter Rail Network' includes the following:

It is the intention of the NTA, in conjunction with Irish Rail, Southern Regional Assembly, Limerick City and County Council and Clare County Council, to:

Provide investment in the Phase 1 Rail Network for the LSMA as follows:

- Improve the frequency of services on the Ennis Rail Line to provide for an efficient and effective commuter rail service in the long term.

This measure within the draft LSMATS will ensure that public transport connectivity to and from Sixmilebridge will be enhanced. The enhanced rail service will link Sixmilebridge to destinations in the metropolitan area and further afield.

Bunratty is also part of the Limerick Shannon Metropolitan Area. Within draft LSMATS, Chapter 8 concerns Walking and includes 'Measure WK3 Metropolitan Town and Village Centres'. This Measure is relevant to both Sixmilebridge and Bunratty and provides that:

> It is the intention of the NTA and the local authorities to:
>
> - Complete the improvements to the pedestrian environment set out in the Shannon Town and Environs LAP; and
> - Complement the consolidation of development around existing LSMA town and village centres with public realm improvements that facilitate a greater level of safer walking trips.

Subsequent text in Chapter 8 states in relation to Sixmilebridge and Bunratty states that:

> Sixmilebridge has a compact town centre, however, the pedestrian environment is of mixed quality and car dominated. The focus will be on improving the connection between the train station and the town centre. Streetscape improvements, and infill development with active frontage and improved connectivity for pedestrians across the river should be undertaken to improve overall north-south connectivity.
>
> Bunratty village centre is located off the N18, along the Local Old Bunratty Road. The village is a major tourist destination within the LSMA due to the Bunratty Castle and Folk Park. Roadstone Wood Quarry is also located along this road, resulting in HGV traffic routing through the town. To accommodate the projected visitor numbers, the public realm along the Old Bunratty Road and towards the visitor centre needs improvement including the upgrade of footpaths and crossing facilities.

In conclusion, I consider that there is comprehensive detail in relation to public transport (and sustainable travel generally) within the draft County Development Plan and Settlement Plans and within the draft LSMATS.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/917 –Downey Planning on behalf of Bluemont

Relevant Chapters / Topics

- **Zoning**

Summary of Issues Raised in Submission

This submission relates to lands zoned as Strategic Residential Reserve (SRR) within the County. No site has been identified in relation to the submission. It is submitted that SRR-zoned sites would be suitable to facilitate the provision of primary care centres and similar related health and social service facilities, and the submission seeks a change to the description of SRR within Section 19.4 'Nature of Zonings' in Chapter 19 'Land Use and Zonings' of the draft CDP.

- SRR lands could also accommodate other uses, which are listed as either permitted in principle or open for consideration and seeks that the Draft would not prevent other uses that would usually be acceptable.
- Such uses could include Primary Care Centres or similar health facilities which provide vital services to communities and therefore the Plan needs to allow reasonable flexibility.
- To allow flexibility in the SRR zoning would be in accordance with objective CDP10.20 of the Draft Plan.
- Note that the grant of permission for primary care centres or similar uses on SRR lands prior to 2027 would not take away from the deliverability of residential development on other zoned lands, and therefore would ensure that the phasing of residential development would continue in accordance with the Core Strategy;
- Would request that the description of SRR (Section 19.4 'Nature of Zonings' in Chapter 19 'Land Use and Zonings' of the draft CDP Volume 1) be reworded as follows:

  "It will also be a requirement that the proposed strategic residential reserve lands can be serviced and offer a reasonable substitute in terms of being delivered within the lifetime of the plan and are sequential development with good connectivity and access to services and amenity. The Planning Authority will also consider granting planning permission for primary care centres and other similar health and social service developments on Strategic Residential Reserve lands during the entirety of the lifetime of this Plan, where it can be demonstrated that they are suitably serviced and there is a requirement for such facilities in the area".

Chief Executive's Response

I wish to thank Downey Planning for the submission, made on behalf of Bluemont, and address the issues raised as follows:

Appendix 2 of the draft CDP consists of an Indicative Land Use Zoning Matrix and states "The purpose of the land-use zoning matrix is to provide an indication only of the type of developments that may or may not be normally considered or open for consideration on zoned lands. Each proposal submitted to the Council for consideration will be assessed based on its own individual merits".

Within this matrix, uses such as Creche/Childcare Facility, Health Centre / clinic, and Nursing Home/Retirement Village are all 'Normally Acceptable in Principle' on Community-zoned lands. Hospitals and Primary Care Facilities are 'Open for Consideration' on Community-zoned lands. Primary Care Facilities are 'Normally Acceptable in Principle' on Mixed-Use zoned lands.

It is considered that primary care centres and other similar health and social service developments are best located on lands zoned as Community or Mixed Use. At Section 19.4 'Nature of Zonings' in Chapter 19 'Land Use and Zonings' Community zoning is described as:

> The development of lands for community uses shall be taken to include the use of lands for community, civic, health services, public or educational uses including the provision of schools, community halls, healthcare facilities and any other facility that is intended to provide some form of community service. A service may be delivered by either a public, community or private body.

The draft CDP has zoned numerous sites for Community Use throughout the settlements of the County.

I note that at Section 19.4 'Residential' use is described as follows:

> Residential use shall be taken to primarily include the use of land for domestic dwellings. It may also provide for a range of other uses particularly those that have the potential to foster the development of new residential communities e.g. schools, crèches and open spaces.

I acknowledge that zoned Residential lands have the potential to accommodate other uses, as described above, such as schools, crèches and open spaces. The description of 'Strategic Residential Reserve' states that lands zoned as such will only be considered for development from April 2027 and where it is demonstrated to the satisfaction of the planning authority that zoned parcels of land will not be brought forward for development. The description is clear that a zoned parcel of land must be demonstrated as being constrained from being developed at April 2027, and that the purpose of the Strategic Residential Reserve zoning objective is that lands that are zoned residential are those that are identified for residential growth to meet the needs of the Plan period. Strategic Residential Reserve will only become a viable option post April 2027 should there be a demonstrated constraint on development in zoned residential land. The first line of the description of SRR is indicative of this: "It is acknowledged that not all lands within the settlement boundaries of the serviced settlements will be required to 2029".

To permit development of any type on SRR lands prior to April 2027 would introduce a constraint to the zoned lands which are the lands most compatible with the development of new residential communities. Therefore I do not propose to amend the description of SRR in accordance with the substantive issues of the submission.

Upon review of this submission, I have noted that the description of SRR requires amendment, which I will set out in my recommendation below.

Chief Executive's Recommendation

I recommend the following amendment at Volume 1: Chapter 19 'Land Use and Zonings' Section 19.4 'Nature of Zonings':

Strategic Residential Reserve

Strategic Residential Reserve lands have been identified across serviced settlements to facilitate longer term growth needs across the county. These lands comprise infill or contiguous sites or in some cases there is an on-site planning history of residential use. These lands are considered as the most appropriate site for the long-term sequential expansion of the relevant settlement. These Strategic Residential Reserve lands, in general, will not be brought forward for development within this plan period, with the following exceptions: ~~It is acknowledged that not all lands within the settlement boundaries of the serviced settlements will be required to 2029.~~

~~In these cases some lands have been included as a strategic residential reserve, where they comprise infill or contiguous sites or have a planning history of residential use and can form part of the long-term sequential expansion of the settlement where considered appropriate.~~

1. Non-residential development that is considered to be appropriate to the site context.

2. In addition to protecting these lands for the long term expansion of these settlements, consideration may be given to the development of some of the strategic residential reserve lands before the end of the current plan period where the Planning Authority is satisfied that the development of residential zoned land is progressing faster than expected and a shortage of available lands may arise or residential zoned land is not being brought forward ~~may not be delivered~~ as expected and a shortage may arise during the plan period. The development of such lands will only be considered from the beginning of year four of the Plan (April 2027) in order to give an opportunity for zoned land to be brought forward for development. Development proposals will only be favourably considered ~~and~~ where it can be clearly demonstrated to the satisfaction of the planning authority that a 'Residential' zoned parcel of land in the same settlement will not be brought forward for development due to infrastructural or other demonstrable constraints during the remaining period of the Plan. It will also be a requirement that the proposed 'Strategic Residential Reserve' lands can be serviced and offer a reasonable substitute in terms of being delivered within the lifetime of the plan and are sequential lands within the settlement ~~development~~ with good connectivity and access to services and amenity.

The above exceptions will be subject to compliance with the Core Strategy and the principles of proper planning and development of the area. Development of these 'Strategic Residential Reserve' lands will only be permitted where a substantiated case has been made to the satisfaction of the Planning Authority and the development permitted will not prejudice the future use of the remaining Strategic Residential Reserve lands for the longer-term growth needs of the plan area.

Submission No: S2/920 –Micheal & Brigid Neylon

Relevant Chapters / Topics

- **Commercial Developments**
- **Roads**

Summary of Issues Raised in Submission

This submission relations to issues arising from commercial developments on cul de sac residential roads. There is no map with the submission and the submission does not relate to any particular site, settlement or part of the county.

- Safety concerns with increased volumes of traffic and speeding. Oversized vehicular movements. Overuse of the road beyond its capacity.
- Quality of life is affected due to noise and unsociable working hours.
- Environmental changes with the loss of serenity of country life and the intrusion of noise and light.
- Commercial businesses should be kept in industrial zones away from residential development.
- Property devaluation is also a concern.

The submission states "There should be no commercial developments on Cul De Sac Roads with residential developments".

Chief Executive's Response

I wish to thank Micheal and Brigid Neylon for the submission and address the issues raised as follows:

The draft CDP does not include any policy or guidance that differentiates between cul-de-sac roads and through-roads as regards suitability to accommodate development. From examination of the submission it appears that it relates to development in a rural context, and outside settlement centres. The draft CDP includes a policy objective on Rural Innovation, Enterprise and Employment, as follows:

Development Plan Objective: Rural Innovation, Enterprise and Employment	
CDP8.2	It is an objective of Clare County Council: To encourage growth and arrest the decline of rural areas through supporting the sustainable development of these areas by: a) Facilitating innovative rural enterprises and the diversification of the rural economy into new sectors and services including ICT based industries and those addressing climate change and sustainability;

		b) To give favourable consideration to the sustainable development of existing and start-up rural resource-based industries in rural areas. c) Supporting and facilitating proposals for new small-scale rural enterprises or extensions to existing small-scale rural-based indigenous industries; d) Encouraging new commercial uses for vacant or derelict buildings, including historic buildings and buildings in rural areas subject to compliance with appropriate planning, wildlife legislation and service requirements; and e) Encouraging and supporting the sustainable development of new rural and farm-related enterprises, existing initiatives, innovation in indigenous enterprise (both high-tech and traditional) and on and off farm employment activities.	

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/922 –Clare Traveller CDP Steering Group	
Relevant Chapters / Topics	• **Traveller Accommodation** • **Volume 8 Clare Housing Strategy**

Summary of Issues Raised in Submission

This submission relates to Traveller accommodation and outlines associated health, educational and other impacts.

Provides information on the Clare Traveller Community Development Project and figures in relation to homelessness, health, unemployment and prison population. Refers to the Traveller Accommodation Programme (TAP) 2019-2024 which was not passed by the Local Traveller Accommodation Consultative Committee (LTACC) and had no input from Clare Traveller community. Consider there is a need for a participatory Traveller Housing Needs Assessment and that at review the current TAP to reflect the actual community needs and this to be reflected in the new Plan.

Considers there is a need to re-evaluate the approach to assessment of Traveller accommodation needs. This should involve facilitation of a Traveller-to-Traveller engagement and discussion, providing real options and possible outcomes in discussions with Travellers, clear focus on accommodation needs associated with Traveller culture, and engagement with Travellers around projection of future accommodation needs and futureproofing of accommodation recommendations.

Chief Executive's Response

I would like to thank the Clare Traveller CDP Steering Group for the submission and acknowledge the important issues raised.

I note the points made in relation to the current Clare County Council Traveller Accommodation Programme 2019-2024, the request for a review of the current TAP to include a participatory Traveller Housing Needs Assessment. It is the role of the county development plan to support and facilitate the delivery of accommodation, including Traveller accommodation, and to promote programmes such as the Traveller Accommodation Programme. In this regard, Section 5.2 of the Draft Plan includes relevant policies from the housing strategy addressing specialised housing requirements, including those of the Traveller community. Objective CDP5.10 highlights the Council's commitment to provide appropriate housing accommodation for the Traveller Community in accordance with the current TAP and any subsequent programme adopted by the Council. However, responsibility for the preparation and delivery of the TAP does not lie within the scope of the county development plan. In relation to any future amendments to the current TAP, this will be reflected in the County Development Plan at an appropriate time.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/924 –Deirdre Ni Tuathaláinn	
Relevant Chapters / Topics	• **Telecommunications**

Summary of Issues Raised in Submission

This submission relates to telecommunications infrastructure.

The submission expresses concern about the government's policy on public exposure to electromagnetic radiation. Concern is also set out regarding the planning legislation on telecommunications which is stated to have resulted in the proliferation of telecommunications structures around the county, many of which have been erected in inappropriate areas.

The submission requests that Section 8.8.10 at the end of Chapter 8 be amended as follows:

> ".....The Planning Authority will work with the telecommunications providers to facilitate the development of infrastructure that respects the recognised values of the natural and built heritage and will seek to encourage the co-location of masts and antennae on existing structures within the County and will encourage the preferred option of wired fibre broadband. Operators shall be required to submit documentary evidence as to the non-feasibility of this option in planning applications for new structures and shall submit details of correspondence with other telecommunications operators addressing the sharing of mast facilities in the area. They shall also indicate in the application whether they are willing to share the proposed masts with other telecommunication operators."

The submission requests that Objective CDP8.44 be amended as follows:

> "It is an objective of the Council to locate telecommunications masts in non-scenic areas, or in areas where they are unlikely to intrude on the setting of, or views of/from, national monuments or protected structures or have an adverse effect on the environment including the integrity of Natura 2000 sites. Standalone telecommunication installations will not generally be favoured in residential areas, beside schools, on land where development may be restricted or prevented for amenity or environmental reasons or in areas that are architecturally important."

It is requested that planning applications shall where possible avoid the following areas:

> Nationally, European or Internationally designated sites, Primary and Secondary Special Amenity Areas, Protected views and prospects, Archaeological/geological sites, Listed structures and monuments.

Any proposals for development in these areas will require the applicant to outline the need to develop at this location.

It is requested that the Council require, where antennaes are erected, that the beam of greatest intensity from a base station does not fall on school or creche grounds.

When considering an application for installation or replacement the operator should be required to show evidence they have consulted with the relevant educational bodies.

The submission expresses concerns regarding the effects of telecommunications infrastructure on human health. It is stated that the concerns are based on scientific studies which demonstrate the harmful effects of electromagnetic fields to health and the environment. The National Toxicology Programme released the results of a 10 year study on mobile phones and cancer which found evidence that high levels of radio frequency radiation lead to cancerous heart tumours. Specific studies show higher rate of illnesses and cancers in those living near mobile masts. It is vital that the safety of public is prioritized over the interests of the telecommunications industry.

Chief Executive's Response

I wish to thank Deirdre Ni Tuathaláinn for the submission and to address the issues raised as follows:

In its formulation of the development plan, the Council is required to be consistent with the Planning Guidelines for Telecommunications Antennae and Support Structures (Department of the Environment, 1996).

In its assessment of planning applications regarding proposed telecommunications infrastructure, the Council is required to be consistent with the Planning Guidelines for Telecommunications Antennae and Support Structures and with the Development Plan. The key policy objective in the draft CDP which relates to Telecommunications Infrastructure is CDP11.55:

Development Plan Objective CDP 11.55: Telecommunications Infrastructure

It is an objective of the development plan:

> To consider the provision of high-speed, high-capacity digital and mobile infrastructure within the County having regard to the DoEHLG Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities 1996 (as updated by PL07/12 of 2012) with regard to the appropriate environmental assessments and compliance with CDP3.1 of this plan.

Additionally, the draft Development Plan, at Section 11.8.9 Telecommunications Infrastructure, states: "The Planning Authority will work with the telecommunications providers to facilitate the development of infrastructure that respects the recognised value of the natural and built heritage and will seek to encourage the co-location of masts and antennae on existing structures within the County".

The 'Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities' provide comprehensive policy support for the consideration of visual and scenic amenity among other considerations. Section 4.3 of the Planning Guidelines for Telecommunications Antennae and Support Structures, (1996) states the following:

> Whatever the general visual context, great care will have to be taken when dealing with fragile or sensitive landscapes, with other areas designated or scheduled under planning and other legislation, for example, Special Amenity Areas, Special Protection Areas, the proposed Natural Heritage Areas and Special Areas of Conservation and National Parks. Proximity to listed buildings, archaeological sites and other monuments should be avoided.

The Guidelines seek that site selection for telecommunications masts avoid the smaller towns and villages or their immediate surroundings except as a last resort, and should also avoid proximity to residential areas or schools if locating in urban areas. The Guidelines seek in all instances that the need for the mast must be established and that co-location of telecommunications infrastructure onto existing masts should be fully considered at site selection stage.

I consider that the Guidelines address many of the concerns expressed in the submission, and that adherence to the Guidelines by the Development Plan represents a satisfactory policy approach at County level.

PUBLIC HEALTH

With regard to the potential impact of telecommunication antennae on public health, the antennae would be monitored nationally by the Commission for Communication Regulations in accordance with Government guidelines and the requirements of the International Commission on Non-Ionizing Radiation Protection. This is not a matter for which the Development Plan can include a policy basis.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/927 –Irish Bioenergy Association	
Relevant Chapters / Topics	• **Renewable Energy** • **Bioenergy**

Summary of Issues Raised in Submission

This submission relates to bioenergy as a renewable energy consideration.

- Welcomes the policy set out in the Draft in support of bioenergy industry.
- Many of the options for reaching a 40% renewable heat target by 2030 is supported in the Draft such as the use of wood fuels.
- Welcomes the support for anaerobic digestion. A biogas industry in Co Clare would bring many benefits to wide range of stakeholders.
- Draft also highlights the role of gasification, energy crops, district heating and combined heat and power plants.
- The Association is happy to engage with Council in providing guidance and assistance.
- The NWRA's Regional Spatial and Economic Strategy makes reference to the support and development of the bio-economy sector and the bioeconomy and bioenergy are linked and set out in draft documents.
- Council's specific objectives to increase the penetration of bioenergy projects in the county, to repurpose brownfield sites and promote bioenergy is largely aligned with Association's own remit.

Chief Executive's Response

I thank the Irish Bioenergy Association for the submission and I acknowledge the support from the Irish BioEnergy Association and note its objective to maximise bio-energy use in the County in order to make a proportional contribution to meeting, or exceeding, national targets for renewable heat and transport.

Chief Executive's Recommendation

I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/928 – University of Limerick	
Relevant Chapters / Topics	• **UL** • **SDZ** • **Errina Canal** • **LNDR**

Summary of Issues Raised in Submission

A summary of the key points raised in this submission is as follows;

- The university acknowledges the referencing to UL throughout the draft plan.
- The University welcomes the recognition of the University's role to date and the fact that the plan includes strategic objectives such that it will continue to be a critical driver of educational, economic, cultural and social performance in the County.
- The Clare Campus is just over 20 years old but has already contributed significantly to the County since its inception. This part of the campus will in terms of scale, see the key thrust of University development other than for the University's City Campus in Limerick City for the foreseeable future. To this extent, the provisions of the draft plan relating to the University and the University zone will act as an enabling context and framework for this future development.
- The lack of a direct road access into Co. Clare and onwards to Shannon airport and the wider sub region has curtailed the full impact of the development to date. This underlines the huge significance and importance of the Limerick Northern Ring Road (LNDR) to the County and the University which would give enhanced access and educational, social, cultural and economic connectivity. The early advancement of this route cannot be over-emphasised.
- It is noted that the LNDR is listed as a 'key enabler' in the Southern Region 'Regional Spatial and Economic Strategy' (RSES); as a 'key strategic regional priority' in the National Road Projects section at RPO 167 and a 'key priority' in the Limerick MASP section of the same plan and that its 'fast-track delivery' is a 'strategic investment priority'. The University supports all objectives listed in the draft Plan to prioritise the route and its early delivery.
- The designation and delivery of the South Clare/University of Limerick Economic Strategic Development Zone (SDZ) will be one of the most significant economic, social and cultural developments to be launched by the RSES and Clare County Development Plan 2023-2029 for the MASP area of Limerick/Clare and for the Mid West.
- Clare County Council and the University of Limerick have come together to provide a project of national significance that will have far reaching impacts. The SDZ is supported in the RSES as one of the key locations for employment and enterprise in the MASP area

of Limerick. The support of an application for the designation of the SDZ and its subsequent development is set out in the RSES at 4.0 'National Enablers' for the Limerick MASP area. The University welcomes the prominence given to the SDZ in the Core Strategy, settlement hierarchy, the linkage with Shannon (CDP 6.6) and at 6.9.1 of the Plan setting out the nature and scale of what is involved.

- It is noted that the population allocation in the Core Strategy and settlement hierarchy allows for a figure of 3,500 which is provided for in the Department of the Environment, Heritage and Local Government draft guidelines on Core Strategies.
- The University notes in particular the draft Development Plan objective at CDP 6.8 and is supportive of this objective relating to the SDZ. Specific reference is made to point e) regarding the Errina Canal. It is important that any proposal by Irish Water to extract water from the River Shannon would include scrutiny regarding any impact the extraction point would have on the Errina Canal proposal of the SDZ. It is suggested in the submission that the Errina Canal should be included as a specific point in this objective.
- The University supports the Council in its wish to develop the SDZ in partnership with the University and is confident that the Council will ensure that the adopted plan will contain all the necessary elements to support its designation, adoption and provision from a Development Plan point of view.

Chief Executive's Response

I would like to thank the University of Limerick for this submission, and I wish to respond as follows.

I welcome the support of UL for the policies and objectives that are included in the Draft Clare County Development Plan 2023-2029. The delivery of the Limerick Northern Distributor Road is a key priority for Clare County Council, and I welcome the very positive submission which UL have made supporting the policies and objectives set out in the draft plan in relation to same.

I also welcome UL's very positive submission in relation to the proposed Strategic Development Zone. I am excited to be working together in partnership with UL on the development of the South Clare/UL Economic Strategic Development Zone and I am equally as committed as my partner in its advancement. The delivery of this project to completion stage will occur over several plan periods however I consider that it is essential that policies and objectives are included in the draft plan 2023-2029 which support its initial designation and the commencement of its delivery.

I note UL's specific comments in relation to the Errina Canal and in this regard I note that CDP11.28 of the Draft Plan relates to Water Extraction from Lough Derg. I concur with the concerns of UL regarding the possible implication of the water extraction on the reopening of the Errina Canal, which is a strategic element of the proposed SDZ and I agree that a specific reference

regarding the protection of the Errina Canal should be inserted into the plan.

Chief Executive's Recommendation

An amendment to Vol 1 Written Statement Section 11.3.4 Water Extraction from Lough Derg CDP11.28 as follows.

Development Plan Objective: Strategic Water Supply Projects	
CDP11.28	It is an objective of Clare County Council: a) To support investment and the sustainable development of strategic water supply projects by Irish Water, leakage reduction programmes and initiatives through the *National Water Resources Plan* subject to appropriate environmental assessment and the planning process; b) To carefully scrutinise any proposals for the abstraction of water from Lough Derg, either for storage or direct supply outside the County which, due to geographical proximity, may have a significant impact on County Clare taking the impacts of Climate Change and in particular low flow conditions which are now prevalent across the County throughout the year; and c) To ensure any abstraction proposals are in compliance with the environmental requirements of Objective CDP3.1 of this plan. d) To carefully scrutinise any proposals for the abstraction of water from Lough Derg which may have an impact on the proposed South Clare/UL Economic Strategic Development Zone, an objective of which is the reopening of the Errina Canal.

Submission No: S2/933 –Wind Energy Ireland	
Relevant Chapters / Topics	• **Renewable Energy**

Summary of Issues Raised in Submission

The submission raises a number of issues as follows:

- The increase in the renewable energy target from 70% to 80% as set out in the Climate Action Plan is not stated in the Policy section. The context for the legislation and policy chapter is not clearly set out in the Draft Plan, and so does not outline why it is imperative that we develop renewable energy generators and reduce greenhouse gas emissions.
- The Wind Energy Strategy for County Clare has not been updated from the version incorporated into the Clare County Development Plan 2017-2023. While the Wind Energy Strategy (Section 3.2) states that Clare County Council will aim to achieve a minimum target of 550 MW from wind energy by the conclusion of the strategy, a statement acknowledging that additional capacity will be considered and facilitated in accordance with the principles of the existing Wind Energy Strategy would be welcome. It would also be useful to set an objective to review the Wind Energy Strategy within a set time.
- WEI commends Clare on the ambition to become a county with a diverse rural community and economy as well as developing renewable energy projects. WEI recognises projects need to be designed and laid out in a way that is sensitive to a particular landscape type, while increasing level of renewable energy generation.
- WEI has been advocating for a regional approach to the spatial planning of wind farm developments, to compliment the Local Authority-level approach that has been the case to-date, in order to optimise the development of wind farms while allowing for the protection of landscapes. The regional approach would provide a more appropriate platform for ensuring national policy can be transposed effectively to local level.

Chief Executive's Response

I thank Wind Energy Ireland for the submission.

WEI correctly outlines that the renewable energy target has been revised up to 80% under CAP21 and confirm that this is already considered in the draft Renewable Energy Strategy.

Chapter 2 of the draft Renewable Energy Strategy (RES) presents the hierarchy of International, European, and National legislation and policy which has informed the preparation of the strategy. Whilst it is not exhaustive, it provides an accurate indication of the main legislations and publications informing the strategy. Furthermore, this provision of legislative context for a Renewable Energy Strategy complements the vision and strategic aims for County Clare which are presented in Chapter 1, which highlights the need for reduction in greenhouse gas emissions and an increase in renewable energy generation technologies.

In accordance with the requirements of the Department of Environment, Community and Local Government as set out in Circular PL20-13, the current Clare Wind Energy Strategy 2011-2017 is not being reviewed as part of the preparation of this draft Plan. Within the draft Plan, CDP11.47

Renewable Energy and the draft Renewable Energy Strategy Section 6.6, there is a commitment made through policy support to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, upon the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

In response to the comment relating to additional capacity I proposed to include additional text in Chapter 4 Summary of Renewable Potential, Resource and Targets as I set out in my recommendation.

Under Climate Action Plan 2021, Action 102 seeks to publish a framework to set out targets for onshore renewable electricity development to inform spatial plans which will translate national objectives into regionalised targets for the Regional Assemblies, that will be realised through the Local Authorities. This process is under way with a targeted delivery date of Q4 2022.

Chief Executive's Recommendation

I recommend the following amendment to the Draft Clare County Development 2023-2029 as follows:

- Volume 5 Clare Renewable Energy Strategy, Chapter 4 Summary of Renewable Potential, Resource and Targets – include the following:

"The targets established in the RES should not be interpreted as a ceiling, and in the event that significant progress is being made towards the overall goal of a low carbon economy through renewable energy generation, any further projects should not be delayed or influenced by the fact they may result in any of the established targets being exceeded."

Submission No: S2/939 –Paul O'Connor

Relevant Chapters / Topics

- **Wind Energy**

Summary of Issues Raised in Submission

This submission relates to areas of Woodcock Hill, Gallows Hill and Ballycar Hill for wind farm development.

- To remove the wind farm zoning and refuse any applications under the current Plan.
- People before profit and the protection of habit and wildlife.
- That 0 risk is only acceptable risk with regards landslides and aviation safety.
- To learn from past disasters (eg Derrybrien, Meenbog).
- Offshore wind should be no 1 priority.
- Ensure Woodcock Hill Bog and surrounding area are protected.
- Protect hen harrier and other species.
- Recognise the impact on local community from noise and shadow flicker issues.

Chief Executive's Response

I thank Paul O'Connor for the submission.

It is not appropriate to discuss individual planning applications within the context of the plan preparation process. Every planning application is considered within the policy objectives of the Development Plan in place at the time of a proposal being submitted to the Planning Authority. The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level strategic mapping for the County and is not intended to provide the same degree of accuracy or detail as the research expected for a site-specific project, and therefore comment on the specific merits/characteristics of an individual site, for example in relation to proximity to housing, or in relation to ecological sensitivity, is beyond the scope of the draft RES.

I acknowledge the concerns over potential landslides and aviation safety associated with windfarm development. The development management process requires the highest standards of community and environmental protection. General safeguards on amenity and environmental protection are included in Section 17 of the draft RES.

The draft Plan also includes objectives CDP 3.1 Appropriate Assessment (AA), Strategic Environmental Assessment (SEA) and Strategic Flood Risk Assessment (SFRA) and CDP 11.47 Renewable Energy outline the requirement for the draft CDP and associated supporting volumes (including Volume 5, Clare Renewable Energy Strategy) to comply with all relevant EU Directives including the Habitats Directive, Birds Directive and the Water Framework Directive and all relevant transposing national legislation. Furthermore, it is an objective of Clare County Council to support the sustainable development of renewable wind energy at appropriate locations, and in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment, and protected habitats and species, and to assess proposals having regard to associated SEA and AA.

The landscape, topography and wind energy resource in this part of Ireland makes wind farm development a sensible approach for the county. In recognition of the climate and biodiversity crises currently facing Ireland and global populations, private sector investment is critical to achieving the ambitious targets set forth. Clare County Council seek to create an environment which encourages collaboration between private companies, public sector, education sector and local communities which will promote research, development and innovation, and which will create new opportunities for the people of Clare whilst supporting a just transition to a net-zero emissions environment.

In the draft Plan there is a commitment through the inclusion of a specific objective to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/940 –Michael Duffy	
Relevant Chapters / Topics	• **Land Use Zoning** • **Wastewater Treatment Systems**
Summary of Issues Raised in Submission	

This submission relates to the SEA and the associated objectives. The following objectives should be amended to include text in relation to:

- CDP2.4 – smart growth of clusters where appropriate;
- CDP2.6 – an assessment of foul connections to legacy stormwater culverts in urban areas;
- CDP2.9 – headroom capacity for every wastewater plant should be sought from Irish Water and declared in this review;
- CDP2.11 – as at CDP2.6, existing combined foul and storm systems should be assessed with a view to separating them to ease volumes requiring treatment;
- CDP2.22 – seek assessment of pumped storage generation;
- CDP4.5 – headroom capacity for every wastewater plant should be sought from Irish Water and declared in this review;
- CDP4.6 - headroom capacity for every wastewater plant should be sought from Irish Water and declared in this review;
- CDP4.7 – in relation to sub-paragraph (e) include discharge of treated effluent to surface waters under licence;
- CDP4.8 – to include a reference as proposed to an amended CDP4.7 (e);
- CDP4.9 – to include reference as proposed to an amended CDP4.7 (e) and CDP4.8 that wastewater systems can be installed in new or existing clusters, with discharge to surface waters, even if remote from the site, under licence. Consideration to be taken of CDP2.4 and the detail given regarding CDP2.4 in this submission;
- CDP4.10 – include an approach to extending clusters (or considering new clusters in appropriate locations) including provision of wastewater treatment. This is to reduce ribbon development and address access issues onto national routes;
- CDP4.13 – growth of settlements must be informed by infrastructure capacity which should be determined in advance of zoning in this plan;
- CDP4.14 – to recognize that treated effluent for a one off dwelling can be discharged to surface water under licence and that be taken into account in areas where percolation is such that to date sites have been declared unsuitable and permissions have been refused. Granted permissions to be transferrable to persons who can demonstrate compliance with rural policies, rather than making a new application;
- CDP4.20 – Only very limited resources should be applied to this objective as agents are aware of guidelines and understand attitudes of Planning Authority in this regard. Agents can advise their clients appropriately;
- CDP5.7 – elected members to be informed by a third party regarding s.180 legislation and the taking in charge obligations of the LA and the role of Irish Water;

- CDP11.34 – as stated previously, that appropriate discharge to surface water under licence is considered when alternatives are not available;
- CDP11.38 - identify suitable locations for the disposal of inert building waste, in proximity to sites, as part of planning applications and with landowners who offer lands for improvement.

Chief Executive's Response

I wish to thank Michael Duffy for his submission and I would like to address the issues raised as follows:

Strategic Environmental Assessment (SEA)

Both the SEA and Appropriate Assessment (AA) which were prepared in tandem with the preparation of the draft Clare County Development Plan 2023-2029 were used to inform all zonings and objectives throughout the process. The best available data and scientific information together with expertise in the relevant disciplines were utilised in this process.

In accordance with the National Planning Framework Clare County Council could not zone any lands for future potential development where insufficient infrastructure exists (i.e. water and wastewater). Equally lands which are subject to flood risk were not zoned in line with the preparation of the Strategic Flood Risk Assessment in accordance with the Floods Directive.

A robust Natura Impact Report prepared as part of the Appropriate Assessment process and incorporated into the Strategic Environmental Assessment is one in which areas of particular sensitivity in terms of their designation as a European site are firstly avoided and secondly where the potential for indirect, cumulative or in-combination effects are mitigated as appropriate. This has been achieved through the preparation of the Clare County Development Plan through the incorporation of the site-specific mitigation measures associated with the relevant zonings, as technical guidance for each land parcel. This will serve to inform future potential landowners, developers, agents and the general public as to the site specific surveys, field investigations etc which should be undertaken at site level.

A County Development Plan is a strategic level document which serves to inform the lower tier plans and applications at Development Management stage.

Policy Objectives of the draft CDP – Chapter 2 Climate Action

Objective CDP2.4 'Smart Growth Initiatives'

Objective CDP2.4 reads as follows: "It is an objective of Clare County Council to support smart growth initiatives that develop new solutions to existing and future urban challenges, including climate risks in the County and to seek climate and smart technology funding in this regard." I consider that this is a general objective within the Climate Action chapter and is not intended to capture particular initiatives such as development at clusters or the establishment of new clusters. Clusters are predominantly located in open countryside where there is no connection to water or waste water infrastructure, located on poor soils or areas of Karst. Following an analysis of the clusters located across the county it has been established that there is sufficient capacity for growth on a sustainable basis within the existing cluster boundaries without leading to impacts on such sensitive receptors for this planning cycle. As per the requirements of the NPF and the RSES for the Southern Region the focus is on

growing the rural villages of the County and enhancing the offering for the rural population within these communities which represents more sustainable growth of the rural areas. I do not propose to amend the draft CDP on this issue.

Objective CDP2.6 Flood Risk Assessment and Management

The submission seeks the inclusion within CDP2.6 of reference to the assessment of foul connections to legacy stormwater culverts in urban areas. The draft CDP strongly encourages stormwater separation from combined sewers (under Objective CDP11.33 (e)) and the implementation of Sustainable Drainage Systems (SuDS) to remove surface water from combined sewers, thereby freeing up additional capacity for development. This is particularly relevant to achieving compact growth objectives in settlements. Legacy issues pertaining to stormwater culverts in urban areas are being addressed by Irish Water on a rolling basis. I do not propose to amend the draft CDP on this issue.

Objective CDP2.9 Effective Collaboration to Implement River Basin Management Plans and the Water Framework Directive

The submission seeks that headroom capacity for every wastewater plant should be sought from Irish Water and declared in this review.

Irish Water have engaged with Clare County Council from the onset of this review to inform both the policy objectives and the zoning of our settlements. They have provided feedback at the pre-draft and draft stages which has incorporated a critique of the zoning identified, the planned upgrades and the planned investment in wastewater treatment plants across the county together with the available headroom. The information as provided at this draft stage will be taken into consideration in informing the final Plan. I do not propose to amend the draft CDP on this issue.

Objective CDP2.11 Storm Water Management.

The submission seeks that existing combined foul and storm systems should be assessed with a view to separating them to ease volumes requiring treatment. The draft CDP strongly encourages stormwater separation from combined sewers (under Objective CDP11.33 (e)) and the implementation of Sustainable Drainage Systems (SuDS) to remove surface water from combined sewers, thereby freeing up additional capacity for development. This is particularly relevant to achieving compact growth objectives in settlements. Legacy issues pertaining to stormwater culverts in urban areas are being addressed by Irish Water on a rolling basis. I do not propose to amend the draft CDP on this issue.

CDP2.22 Ardnacrusha Hydroelectric Power Station

In relation to this objective, the submission seeks the assessment of pumped storage generation in several potential locations in the County. These locations are not identified in the submission. I consider that pumped hydroelectric energy storage has been subject of a thorough assessment to identify potential areas where it may be suitable, details of which are contained in Chapter 15 ' Energy Storage' in the Clare Renewable Energy Strategy which is Volume 5 of the Draft CDP. I do not propose to amend the draft CDP on this issue.

Policy Objectives of the draft CDP – Chapter 4 Urban and Rural Settlement Strategy

CDP4.5 Service Towns

The submission seeks that headroom capacity for every wastewater plant should be sought from Irish Water and declared in this review.

Irish Water have engaged with Clare County Council to inform both the policy objectives and the zoning of our settlements. They have provided feedback at the pre-draft and draft stages which has incorporated a critique of the zoning identified, the planned upgrades and the planned investment in wastewater treatment plants across the county together with the available headroom. The information as provided at this draft stage will be taken into consideration in informing the final Plan. I do not propose to amend the draft CDP on this issue.

CDP4.6 Small Towns

The submission seeks that headroom capacity for every wastewater plant should be sought from Irish Water and declared in this review.

Irish Water have engaged with Clare County Council to inform both the policy objectives and the zoning of our settlements. They have provided feedback at the pre-draft and draft stages which has incorporated a critique of the zoning identified, the planned upgrades and the planned investment in wastewater treatment plants across the county together with the available headroom. The information as provided at this draft stage will be taken into consideration in informing the final Plan. I do not propose to amend the draft CDP on this issue.

CDP4.7 Large Villages

The submission seeks that in relation to sub-paragraph (e) the discharge of treated effluent to surface waters under licence is included. Sub-paragraph (e) states:

> *To ensure that in the case of any development/reuse or redevelopment where connection to an existing wastewater treatment plant is not possible, the provision of a private waste water treatment system will only be permitted where it can be demonstrated that the proposed system meets standards set out within EU and national legislation and guidance.*

I consider that the requirement to meet standards set out in EU and national legislation and guidance is sufficient to cover the method of discharge. I do not propose to amend the draft CDP on this issue.

CDP4.8 Small Villages

The submission seeks that the discharge of treated effluent to surface waters under licence is included. I consider that the requirement to meet standards set out in EU and national legislation and guidance is sufficient to cover the method of discharge from any waste water treatment system permitted within a Small Village. I do not propose to amend the draft CDP on this issue.

CDP4.9 Clusters

The submission seeks to include the same reference that is sought as an amendment to CDP4.7 (e) and to CDP4.8, that wastewater systems can be installed in new or existing clusters, to enable new development, with discharge to surface waters, even if remote

from the site, under licence. The submission seeks that consideration be taken of CDP2.4 (Smart Growth Initiatives) and the detail given regarding CDP2.4 in this submission.

I consider that unnecessarily expanded growth within Clusters should not be supported where there are no services or amenities available. This is the case within the vast majority of the clusters that are designated in the draft CDP and would be the same in any potential cluster for which the designation may be sought. To consider expansion of the number of clusters or expansion of the spatial extent of existing clusters would reflect negatively on the Strategic Environmental Objectives in terms of Climate Change and Population and Human Health, because unsustainable development, in the absence of infrastructure, increases Green House Gas emissions and the release of carbon through the need for residents to travel by motorised vehicle to destinations such as shops, schools and leisure activities which are remote from the cluster in which their house is (or may be) located. As per the requirements of the NPF and the RSES for the Southern Region the focus is on growing the rural villages of the County and enhancing the offering for the rural population within these communities which represents more sustainable growth of the rural areas. I do not propose to amend the draft CDP on this issue.

CDP4.10 Countryside

The submission seeks that this objective include an approach to extending clusters (or considering new clusters in appropriate locations) including provision of wastewater treatment. This is to reduce ribbon development and address access issues onto national routes.

I consider that unnecessarily expanded growth within Clusters should not be supported where there are no services or amenities available. This is the case within the vast majority of the clusters that are designated in the draft CDP and would be the same in any potential cluster for which the designation may be sought. To consider expansion of the number of clusters or expansion of the spatial extent of existing clusters would reflect negatively on the Strategic Environmental Objectives in terms of Climate Change and Population and Human Health, because unsustainable development, in the absence of infrastructure, increases Green House Gas emissions and the release of carbon through the need for residents to travel by motorised vehicle to destinations such as shops, schools and leisure activities which are remote from the cluster in which their house is (or may be) located. As per the requirements of the NPF and the RSES for the Southern Region the focus is on growing the rural villages of the County and enhancing the offering for the rural population within these communities which represents more sustainable growth of the rural areas. I do not propose to amend the draft CDP on this issue.

CDP4.13 Planned Growth of Settlements

The submission seeks that the growth of settlements must be informed by infrastructure capacity which should be determined in advance of zoning in this plan.

In accordance with the National Planning Framework Clare County Council could not zone any lands for future potential development where insufficient infrastructure exists (i.e. water and wastewater). Equally lands which are subject to flood risk were not zoned in line with the preparation of the Strategic Flood Risk Assessment in accordance with the Floods Directive. I do not propose to amend the draft CDP on this issue.

CDP4.14 New Single Houses in the Countryside within the 'Areas of Special Control'.

The submission seeks that the objective recognise that treated effluent for a one off dwelling can be discharged to surface water under licence and that be taken into account in areas where percolation is such that to date sites have been declared unsuitable and permissions have been refused. The submission also seeks that granted permissions shall be transferrable to persons who can demonstrate compliance with rural policies, rather than making a new application.

In relation to discharges to surface water under licence, I note the following:

- The 2021 EPA Code of Practice: Domestic Wastewater Treatment Systems states that:

  "If the percolation value is >120 the site is unsuitable for DWWTS discharging to ground. Discharge to surface water may be alternative but requires Water Pollution Discharge Licence from Local Authority";

- Clare County Council have never issued Section 4 licences for one-off houses;
- It is my understanding that where other Councils issued Section 4 licences for one-off houses, there is evidence that it has caused a significant negative environmental outcomes.
- There is no mechanism in the Water Pollution Act 1977/1990 that licences can be easily transferred.

As a result of the above consideration, I do not propose to amend the draft CDP on this issue.

In relation to granted permissions being made transferrable to persons who can demonstrate compliance with rural policies, rather than making a new application, I consider that a legislative change would need to be made to accommodate this scenario. It is not therefore within the remit of the draft CDP to make provision for it.

CDP4.20 Clare Rural House Design Guide

The submission seeks that only very limited resources should be applied to the preparation of a new Clare Rural House Design Guide during the period of the Development Plan. The rationale for this request is as agents are aware of guidelines and understand attitudes of Planning Authority in this regard, and that agents can advise their clients appropriately. The submission is noted in respect of this item.

<u>Policy Objectives of the draft CDP – Chapter 5 Housing</u>

CDP5.7 Unfinished Developments and Taking in Charge

The submission seeks that elected members be fully informed by a third party regarding Section 180 legislation and the taking in charge obligations of the LA and the role of Irish Water with respect to Section 180.

Objective CDP5.7 states that "*it is an objective of Clare County Council to work with all relevant stakeholders to ensure that residential developments are taken in charge in accordance with the requirements of the Planning and Development Act, 2000 (as amended) and the Council's Taking in Charge Policy for Private Housing Developments 2009 and any subsequent policy".* I consider that this objective provides adequate information regarding the Council's activities

regarding Taking In Charge of estates, and that in particular the existence of the Council's Taking in Charge Policy for Private Housing Developments (2009) is a valuable source of information. I do not propose to amend the draft CDP on this issue.

Policy Objectives of the draft CDP – Chapter 11 Physical Infrastructure, Environment and Energy

CDP11.34 Rural Wastewater Treatment Programme

The submission reiterates the request that appropriate discharge to surface water under licence is considered when alternatives are not available.

I note the following in relation to discharges to surface water under licence:

- The 2021 EPA Code of Practice: Domestic Wastewater Treatment Systems states that:

  "If the percolation value is >120 the site is unsuitable for DWWTS discharging to ground. Discharge to surface water may be alternative but requires Water Pollution Discharge Licence from Local Authority";

- Clare County Council have never issued Section 4 licences for one-off houses;
- It is my understanding that where other Councils issued Section 4 licences for one-off houses, there is evidence that it has caused a significant negative environmental outcomes.
- There is no mechanism in the Water Pollution Act 1977/1990 that licences can be easily transferred.

As a result of the above consideration, I do not propose to amend the draft CDP on this issue.

CDP11.38 Construction and Demolition Waste

The submission seeks that the objective makes provision for scenarios where a planning application for a development that generates inert building waste can identify suitable locations for the disposal of that waste, in proximity to the development site in collaboration with landowners who offer lands for improvement.

The disposal of building waste arising from a development can be subject to conditions to the planning permission which may require a construction waste management plan, or a demolition method statement, or both, to be submitted. Any off-site disposal of inert building waste would need to be described clearly in those documents. These documents must be agreed with the Planning Authority prior to the commencement of development. I consider that there is adequate policy support for waste disposal from construction sites in Objective CDP11.38 and I do not propose to amend the Draft CDP on this issue.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/945 – TFI Local Link Limerick Clare	
Relevant Chapters / Topics	• **Transport**

Summary of Issues Raised in Submission

TFI Local Link Limerick Clare ask for consideration for inclusion in the consultation process in the preparation of Clare Local Transport Plans.

This submission requests all references to **Local Link** be replaced with **TFI Local Link Limerick Clare** and amendments made as follows:

Ennis MD

- Supports proposal for Friar's Walk (TS4) and a new bus shelter.
- Supports the delivery of a town bus service.

Barefield Village

- Draft states that the village is not currently served by public transport.
- A C13 service is provided every Saturday serving the village twice a day to Ennis, Crusheen, Ballyalla Lake and Ballinruan.

Shannon MD

Sixmilebridge (pg14)

- To include there is a C10 service on a Thursday weekly giving access to Shannon.

Newmarket on Fergus

- To include there is a C4 service Monday-Friday and links Ennis and Shannon twice a day.

Killaloe MD

Scarriff/Tuamgraney (pg11)

- To include following routes C1, C2 & C10 Services to Ennis, Killaloe and Shannon and Bus Eireann Service to Limerick.

Killaloe (pg 28)

Amend as follows:

Killaloe is serviced by public transport with a regular Bus Eireann Service to Limerick and a TFI Local Link Limerick Clare C2 service from Scarriff to Killaloe, Monday to Friday.

Whitegate (pg73)

- Include the following routes C2 Monday-Fridays and C1 on Saturdays.

Kilmurry (pg116)

- Draft states there is a bus service in village. TFI Local Link Limerick Clare currently doesn't provide a service.

Tulla (Pg37)

- To include that there are three services which stop in Tulla, the C1 route, the C4 route and the C11 route.

Crusheen (pg44)

- To include there is a service twice a day on Saturday through its C13 connecting to Barefield, Ballyalla and Ennis.

Feakle (pg49)

- To include the following routes; C1 Monday to Friday, C4 Monday to Friday, C7 Fridays, C9 Thursdays and C11 on a Saturday.

Kilkishen (pg54)

- To clarify TFI Local Link Limerick Clare currently provide this service.
- The C1 runs from Feakle to Ennis via Scarriff and Tulla Monday to Saturday. The C3 runs from Ennis to Feakle via Kilkishen Monday to Friday and the C9 Feakle-Kilkishen-Quin-Ennis runs every Thursday.

Mountshannon (pg60)

- Provides two services the C1 Scarriff-Whitegate on Saturdays and the C2 Scarriff-Whitegate Monday to Fridays.

Quin (pg67)

- To clarify a bus service is provided.
- Provides three services which include the C1 on a Saturday, the C3 Monday to Friday and the C9 on Thursdays.

Clooney (pg97)

- The following routes are provided, C1 service stops in six times a day Monday to Friday and twice a day on a Friday. The C4 stops in Clooney twice a day Monday to Friday and C11 stops in Clooney twice a day every Saturday.

O'Callaghan's Mills (pg129)

Amend as follows:

"TFI Local Link Limerick Clare provide a C2 Scarriff-Killaloe-Scarriff service. It provides a convenient and valuable transport service in East Clare. The stop is the Mills Church and it stops twice a day Monday to Friday. The C1 Feakle to Ennis via Scarriff and Tulla service stops twice a day Monday to Friday and three times on a Saturday. The C9 service Feakle-Kilkishen-Quin-Ennis runs once a day."

Ballinruan (pg80)

- No mention of the transport provided. The C13 Saturday service can stop on a demand responsive basis.

Bodyke (pg84)

- No mention of the transport provided. The C1 stops at the church six times a day Monday to Friday and four times on Saturdays. The C2 service stops twice a day Monday to Friday. The C10 stops twice on Thursdays.

Broadford (pg84)

- No mention of transport provided. The C10 stops twice on Thursdays.

Caher (pg93)

- No mention of transport provided. The C10 stops twice on Thursdays, C11 stops twice Saturdays and C7 stops twice Fridays.

Flagmount (pg101)

- No mention of transport provided. The C10 stops on Thursdays, C11 stops twice Saturdays and C7 Flagmount-Derrybrien-Gort stops twice Fridays.

Killanena (pg112)

- No mention of transport provided. C10 stops twice on Thursdays and C7 stops twice Fridays.

Ogonnelloe (pg133)

- No mention of transport provided. The C2 stops at the national school twice a day Monday to Friday.

West Clare MD

Ennistymon/Lahinch (pg11)

Amend as follows:

- TFI Local Link Limerick Clare provides connections to Ennistymon through its C5 Ennis-Corofin-Lisdoonvarna-Ballyvaughan-Ennistymon service on Tuesdays.

Lahinch (pg6)

- Does not provide services in this area.

Kilrush (pg23)

Amend as follows:

"The TFI Local Link Limerick Clare R337 Ennis to Kilrush via Kildysart Road operates Monday to Sunday. The R335 Ennis to Kilrush via Quilty operates Monday-Friday and the R339 Kilrush to Loop Head operates Monday to Friday September to April and Monday to Sunday May to August. The C19 Kilrush to Cooraclare and Cappa service stops in Kilrush six times on Fridays."

Kilkee (pg49)

Amend as follows:

The TFI Local Link Limerick Clare R335 Ennis to Kilrush via Quilty operates Monday-Friday and stops at the Bus shelter in Kilkee and the R339 Kilrush to Loop Head operates Monday to Friday September to April and Monday to Sunday May to August and stops at the Bus shelter at the Square in Kilkee.'

Lisdoonvarna (pg 55)

Amend as follows:

The TFI Local Link Limerick Clare C5 Ennis-Corofin-Lisdoonvarna-Ballyvaughan-Ennistymon service stops at the square in Lisdoonvarna and the Stella Maris day centre on Tuesdays.

Miltown Malbay (pg61)

Amend as follows:

"… and there is also a Friday and Saturday TFI Local Link Limerick Clare service to Ennis which stops in Jones's SuperValu in Miltown twice a day on those days."

Ballyvaughan (pg70)

Amend as follows:

"…and TFI Local Link Limerick Clare also provide services to Ballyvaughan through its C5 Ennis-Corofin-Lisdoonvarna-Ballyvaughan-Ennistymon service twice on Tuesdays."

Corofin (pg75)

Amend as follows:

"…and TFI Local Link Limerick Clare also provides a regular service to Ennis as well as Lisdoonvarna through its C14 service on Saturdays and C5 service on Tuesdays."

Doonbeg (pg82)

Amend as follows:

"…and TFI Local Link Limerick Clare also provide a daily service Monday to Friday to Ennis and Kilrush through their R335 service. This stops four times a day in Doonbeg"

Quilty (pg98)

Amend as follows:

"…TFI Local Link Limerick Clare provide a daily service Monday to Friday to Ennis and Kilrush through the R335 service. This stops twice a day in Quilty."

Kilfenora (pg109)

Amend as follows:

"…and TFI Local Link Limerick Clare also provides a service on Tuesdays through its C5."

Killimer (pg115)

Amend as follows:

"…The R337 service runs Monday to Sunday. The bus stops at the Ferry terminal ten times a day Monday to Friday and eight times on a Sunday."

Creegh (pg166)

Amend as follows:

"…The R335 stops at St. Mary's Church twice a day Monday to Friday. The C9 service stops in Cree twice on a Thursday."

Fanore (pg186)

Amend as follows:

"…and TFI Local Link Limerick Clare provides a service to Ennistymon through its C5 on a Tuesday. This stops in Fanore twice on Tuesdays."

Inch (pg190)

Amend as follows:

"TFI Local Link Limerick Clare provides a bus service to Ennis on Fridays and Saturdays through the C12 service."

Kilbaha (pg192)

Amend as follows:

"The village is also served by TFI Local Link Limerick Clare with daily services to Kilrush and Kilkee on the R339 and onward services to Ennis."

Kilmurry McMahon (pg204)

Amend as follows:

"Kilmurry McMahon is well served by the TFI Local Link Limerick Clare R337 ten times a day Monday to Saturday and twice on a Sunday. The stop is Morrisseys Post Office."

Knock (pg211)

Amend as follows:

"It is served by TFI Local Link Limerick Clare with regular services to Ennis and Kilrush through the R337 which stops at The Fisherman's Hut nine times a day Monday to Saturday and four times on a Sunday."

Labasheeda (pg221)

Amend as follows:

"TFI Local Link Limerick Clare provides a regular bus service to Ennis and Kilrush which provides a valuable connection to the County town and also offers an alternative to the private car and encourages a modal shift to a more sustainable transport option. The service is the R337 and stops at St. Kieran's church ten times a day Monday to Saturday and four times a day on a Sunday."

Lissycasey (pg226)

Amend as follows:

"The TFI Local Link Limerick Clare service is the R335 Ennis-Quilty-Kilrush and stops at the cemetery and Fanny O'Dea's bar twice a day Monday to Friday. The C19 on Fridays stops in Lissycasey twice that day."

Moyasta (pg236)

Amend as follows:

"…Bus Eireann provide a regular bus service to and from Ennis and Kilkee and people in Moyasta can hail the TFI Local Link Limerick Clare buses who also provide a daily service to Ennis and Kilrush."

Chief Executive's Response

I thank TFI Local Link Limerick Clare for the submission and address the issues raised below:

The support of TFI Local Link Limerick Clare for the proposed enhancement at Friar's Walk in Ennis and the delivery of a town bus service for Ennis is welcomed by Clare County Council. Clare County Council will seek to consult with TFI Local Link Limerick Clare in the preparation of Local Transport Plans in Clare during the plan period.

The suggested amendments to the settlement plans throughout the County will provide greater clarity regarding public transport services available to those settlements. I have examined all of the suggested amendments and I am satisfied that each amendment is appropriate. In my recommendations below I will set out the text changes required to accommodate each amendment.

Chief Executive's Recommendation

Volume 1 Chapter 11 CDP11.8 to be amended as follows:

Development Plan Objective: **Bus Transport**	
CDP11.8	It is an objective of Clare County Council: a) To support the provision of more regular, efficient and fully accessible bus services throughout the County, b) To encourage and support TFI Local Link Limerick Clare private/public/community partnerships in the provision of a more widespread rural bus services; d) To support the creation of bus corridors, integrated bus interchange stations and bus parking facilities both within settlements and at tourist facilities throughout the County subject to appropriate environmental assessment and the outcome of the planning process; e) To promote the introduction of new bus services on routes where they can offer a direct alternative to the routes most popular with private car users; f) To work with all relevant stakeholders to provide new bus pick-up/drop-off locations and bus shelters in towns and villages across the County; g) To work with stakeholders to encourage and promote a sustainable community-based public transport scheme that will enable access to service centres for all members of the community in the County;

	h) To support the provision of a local bus service in Ennis and Clarecastle; and i) To support direct inter-regional bus services to and from Shannon International Airport, Limerick and Galway.

Volume 3A Ennis MD, Barefield Settlement Plan, amend as follows:

Barefield is ideally located in close proximity to Ennis and with direct access to the M18 motorway. The village has a large primary school serving a wide catchment area and is an attractive place to live and provides an attractive alternative to one-off rural housing. Barefield recently received funding under the Town and Village Renewal Scheme to provide a cycle/footpath to link both ends of the village, traffic calming, an uncontrolled pedestrian crossing, drainage and landscaping. This will enhance the village public realm and promote active travel within the village. The C13 bus service is provided by TFI Local Link Limerick Clare every Saturday serving the village twice a day to Ennis, Crusheen, Ballyallia Lake and Ballinruan.

Volume 3B Shannon MD, Sixmilebridge Settlement Plan, amend as follows:

Transportation, Active Travel and Connectivity

Sixmilebridge is situated within the Limerick Shannon Metropolitan Area and forms part of the study area for the draft Limerick Shannon Metropolitan Area Transport Strategy 2040. The strategy seeks to deliver a high quality, accessible integrated and more sustainable transport network that supports the role of the Limerick-Shannon Metropolitan Area as the major growth engine of the Mid-West Region, an internationally competitive European city region and main international entry point to the Atlantic Corridor.

Sixmilebridge is well serviced by public transport with a regular Bus Eireann Service and the Limerick Galway rail line and station. Additionally, the C10 bus service provided by TFI Local Link Limerick Clare runs each Thursday linking Sixmilebridge to Shannon. Given the high level of out-commuting experienced in ~~the~~ Sixmilebridge, walking should be promoted as part of linked trips with public transport. The pedestrian environment around bus stops and the train station should be improved. This will be undertaken in tandem with land use proposals that consolidate the town centre and strengthen its sense of place and function.

Volume 3B Shannon MD, Newmarket on Fergus Settlement Plan, amend as follows:

Transportation, Active Travel and Connectivity

Newmarket-on-Fergus is well serviced by public transport with a regular Bus Eireann Service on the Limerick Galway route. Additionally, the C4 bus service provided by TFI Local Link Limerick Clare runs Monday-Friday and links Newmarket-on-Fergus to Ennis and Shannon twice a day. Given the high level of out-commuting experienced in Newmarket on Fergus, walking should be promoted as part of linked trips with public transport. The pedestrian environment around bus stops should be improved. This will be undertaken in tandem with land use proposals that consolidate the town centre and strengthen its sense of place and function.

Volume 3C Killaloe MD, Scarriff/Tuamgraney Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

- Scarrifff/Tuamgraney is ~~serviced by both the Local Link Service to Ennis and Bus Eireann Service to Limerick~~ served by the C1, C2 & C10 Bus Services to Ennis, Killaloe and Shannon (provided by TFI Local Link Limerick Clare) and by a Bus Eireann Service to Limerick.

  ~~This is a~~ These are valuable bus service~~s~~ for the town which provide~~s~~ an alternative to the private car and aid~~s~~ and encourage~~s~~ a modal shift towards more sustainable modes of transport.

  Provision and enhancement of biodiversity along walking and cycling routes, would promote active recreation and sustainable travel in the village and its environs. There is an opportunity to develop walking, cycle and recreational routes from the town along the East Clare Way linking to the Shannon Blueway at Scarriff Harbour. The creation of a linear park on OS2 would also enhance the amenities of the town.

  Recent completion on Scarrifff Main Street of new ~~foothpaths~~ footpaths and surfaces have enhanced the town. A pedestrian crossing is planned for Connaught Road, ~~whihc~~ which together with improved pedestrian connectivity within the town ~~will~~ will greatly improve the public realm. The creation of a dedicated car park would further enhance the public realm of the Main Street.

  Any proposed development on zoned land will be required to demonstrate how it contributes to enhanced permeability and connectivity within and around the town, to schools and other ~~esential~~ essential services and amenities.

  It is an objective:

  - To support the ~~devlivery~~ delivery of a public car park for Scarrifff.

Volume 3C Killaloe MD, Killaloe Settlement Plan, amend as follows:

Transportation, Active Travel and Connectivity

~~The~~ Killaloe is serviced by public transport with a regular Bus Eireann Service to Limerick and a ~~Local Link~~ TFI Local Link Limerick Clare C2 service from Scarrifff to Killaloe, Monday to Friday. Given the high level of out-commuting experienced in Killaloe, walking should be promoted as part of linked trips with public transport. The pedestrian environment around bus stops should be improved in tandem with land use proposals that consolidate the town centre and strengthen its sense of place and function.

Volume 3C Killaloe MD, Whitegate Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann and ~~Local Link~~ TFI Local Link Limerick Clare provide ~~a~~ valuable bus service~~s~~ to Whitegate. This service provides an ~~valuable~~ alternative to the private car for local residents and encourages a modal shift to a more sustainable transport option. The TFI Local Link Limerick Clare services include the C2 services which link to Scarrifff and Killaloe each day from Monday to Friday and the C1 service (serving Whitegate, Feakle, Scarrifff, Tulla and Ennis) on Saturdays.

Volume 3C Killaloe MD Kilmurry Settlement Plan, amend as follows:

Ballymulcashel housing development on the eastern side of the village is serviced by a shared waste water treatment system. The remainder of the dwellings and services in the village have individual on-site waste water treatment systems.

~~Local Link provides a convenient and valuable bus transport service with a drop off/collection point in the village.~~

Volume 3C Killaloe MD Tulla Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann provides two services which stop in Tulla, ~~a~~ Route 346 Limerick- Tulla-Scarriff-Whitegate ~~route~~ and a Route 348 Scarriff- Flagmount-Feakle- Tulla- Ennis ~~route~~. There are also three TFI Local Link Limerick Clare services which stop in Tulla, the C1 route, the C4 route and the C11 route. ~~This is a~~ These are valuable bus service~~s~~ for the town which provide~~s~~ an alternative to the private car and aid~~s~~ and encourage~~s~~ a modal shift towards more sustainable modes of transport.

Volume 3C Killaloe MD Crusheen Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann provides an hourly service to/from Crusheen on the Galway to Limerick route. This is a valuable bus service for the village which provides an alternative to the private car. TFI Local Link Limerick Clare provides a twice a day Saturday service through its C13 route connecting to Barefield, Ballyallia and Ennis. Crusheen sits on the Limerick to Galway rail line, the railway station is currently closed and the Council fully supports and encourages the re-opening of the station. This Plan includes a safeguard around the railway station to ensure adequate land is protected for it. The Council will work with the relevant stakeholders to lobby for the reopening of the rail station.

Volume 3C Killaloe MD Feakle Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Feakle is served by ~~Clare Bus with a three times a day weekday service from Feakle to Ennis.~~ TFI Local Link Limerick Clare by the following routes; C1 Feakle-Scarriff-Tulla-Ennis (Monday to Friday), C4 Feakle-Ennis (Monday to Friday), C7 Feakle-Gort on Fridays, C9 Feakle-Ennis on Thursdays and C11 Feakle-Ennis on a Saturday. This service provides a valuable alternative to the private car and encourages a modal shift to a more sustainable transport option.

Volume 3C Killaloe MD Kilkishen Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Kilkishen is served by ~~Clare Bus with a weekday service on the Feakle to Ennis route however services in the village are not as frequent as other villages along the route~~. three TFI Local Link Limerick Clare services. The C1 runs from Feakle to Ennis via Scarriff and Tulla Monday to Saturday. The C3 runs from Ennis to Feakle via Kilkishen Monday to Friday and the C9 FeakleKilkishen-Quin-Ennis runs every Thursday. The village is also serviced by Bus Eireann on the Limerick to Tulla route via Sixmilebridge. These services

provide a valuable alternative to the private car and encourages a modal shift to a more sustainable transport option.

Volume 3C Killaloe MD Mountshannon Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann provides a Saturday Service from Limerick to Mountshannon and the expansion of the bus service would greatly support the tourism product in the area and would provide a valuable alternative to the private car for local residents, encouraging a modal shift to a more sustainable transport option. TFI Local Link Limerick Clare provide two bus services from Mountshannon, the C1 Scarriff-Whitegate on Saturdays and the C2 Scarriff-Whitegate (Monday to Fridays).

Volume 3C Killaloe MD Quin Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

~~Quin is served by Clare Bus with a weekday service on the Feakle to Ennis route.~~ Quin is served by TFI Local Link Limerick Clare with three services. These include the C1 Scarriff to Ennis on a Saturday, the C3 Ennis to O'Callaghan's Mills (Monday to Friday) and the C9 Feakle-Kilkishen-Quin-Ennis on Thursdays. This service provides a valuable alternative to the private car for local residents and encourages a modal shift to a more sustainable transport option.

Volume 3C Killaloe MD Clooney Settlement Plan, amend as follows:

Location and Context

Clooney comprises a small linear group of houses based around a church, petrol station and shop. ~~The Clare Bus provides a convenient and valuable transport service with a drop off/collection point at the church in the village.~~ TFI Local Link Limerick Clare provides a convenient and valuable transport service with a drop off/collection point at the church in the village. The C1 Feakle to Ennis (via Scarriff and Tulla) service stops in Clooney six times a day Monday to Friday and twice a day on a Saturday. The C4 Feakle to Ennis stops in Clooney twice a day Monday to Friday. The C11 FeakleFlagmount-Tulla-Ennis stops in Clooney twice a day every Saturday.

There is also a primary school located in close proximity to the village. The settlement is located in a rural area and stretches out along the R352 Ennis to Scarrifff road.

Volume 3C Killaloe MD O'Callaghan's Mills Settlement Plan, amend as follows:

Location and Context

O' Callaghan's Mills is named after an old corn mill that was located on the Mill River, which flows between Kilgory Lough to the north of the village and Doon Lough to the south. It is an attractive village that winds along the R466 regional road between Tulla and Broadford.

The village is divided into two distinct areas with the 'high street' area located to the west. The 'low street' area is located to the east and is served by a church, community hall, national school, GAA grounds and a public house. Both of the areas contain a small amount of residential development. This is mostly in the form of single houses located along the roadside. However, there is a small amount of in-depth

development in both parts of the settlement. There is a stretch of undeveloped land between the two areas, measuring approximately 300 metres.

In terms of infrastructure, there is a public water supply from the Castlelake Water Treatment Plant but there is no public sewage system serving the village. Any future residential ~~development~~, commercial or employment generating development will require private treatment subject to suitable site specific conditions. The EPA Code of Practice for Wastewater Treatment Systems will be strictly adhered to in order to ensure protection of the environment.

~~Clare Bus provides a convenient and valuable transport service in East Clare, while O'Callaghans Mills is not on the main route, stops in the village can be requested as needed as part of this service.~~

TFI Local Link Limerick Clare provide the C2 bus service (Scarriff-Killaloe-Scarriff). It provides a convenient and valuable transport service in East Clare. The stop is at the Church in O'Callaghan's Mills and it stops twice a day Monday to Friday. The C1 Feakle to Ennis via Scarriff and Tulla service stops twice a day Monday to Friday and three times on a Saturday. The C9 service Feakle-Kilkishen-Quin-Ennis stops in O'Callaghan's Mills once a day.

Volume 3C Killaloe MD Ballinruan Settlement Plan, amend as follows:

Location and Context

Ballinruan is identified as a small village in the settlement hierarchy of this Plan. The village is located on elevated lands with extensive views across the countryside to the southwest, west and northwest of the settlement. The road through the village is narrow and winding and is bordered by houses and, in some case, agricultural lands and farm buildings. There has been limited development in Ballinruan in recent years. The majority of the lands within the settlement boundary remain in agricultural use and as a consequence, the village has retained its rural character. There is currently a church, a community centre and a village pub providing services to the local community. The village is the trail head for the Ballinruan Loop and Gortnamearacun Loop walks which link into the Mid-Clare Way. In terms of bus services, the C13 Ennis-Ballyalla-Barefield-Crusheen-Ennis service provided by TFI Local Link Limerick Clare (Saturdays only) can stop in Ballinruan on a demand responsive basis.

Volume 3C Killaloe MD Bodyke Settlement Plan, amend as follows:

Location and Context

The settlement of Bodyke primarily takes a linear form, with an acute bend in the road defining the centre of the settlement. The landscape in and around Bodyke is robust with a significant amount of tree cover and vegetation.

The village consists of residential dwellings built in a linear manner along the R352 radiating from the village centre. Within the village there is a garage/shop, a local pub, a church, a national school and a number of other small businesses.

The TFI Local Link Limerick Clare provide bus services which serve Bodyke. The C1 Feakle to Ennis via Scarriff and Tulla service stops at Bodyke Church six times a day Monday to Friday and four times on a Saturday. The C2 bus service (Scarriff-O'Callaghan's Mills -Scarriff) stops twice a day Monday to Friday. The C10 Scarriff-

Shannon service stops twice on Thursdays. The East Clare Golf Club is also located in close proximity to the village and is a significant recreation and tourism amenity in the area.

Volume 3C Killaloe MD Broadford Settlement Plan, amend as follows:

Location and Context

Broadford is a large village located in a valley in the Slieve Bernagh Mountains. The village takes a long and winding form along the R465 (regional road). The land within the settlement boundary is undulating and many parts of the village have attractive views across the surrounding countryside.

Broadford has a traditional village character and serves a large rural hinterland. Many of the buildings within the village centre remain in residential use and there are also a number of farm holdings located within the settlement boundary. Notwithstanding this, the village has a good service offering for local residents in the village and its hinterland such as shops, post office, local pubs, national school and GAA grounds.

There have been a number of small developments in the village in recent years but development has been restricted by deficiencies in the local service infrastructure. Broadford is not served by a public sewage treatment and is not currently on the Irish Water Programme for Investment. Water is supplied to Broadford through the Broadford Public Water Supply. The TFI Local Link Limerick Clare bus service (C10 Scarriff-Sixmilebridge-Shannon) stops in Broadford twice on Thursdays.

Volume 3C Killaloe MD Caher Settlement Plan, amend as follows:

Location and Context

Caher village is located directly on the shores of Lough Graney and it has a tight-knit centre with a small number of houses developed in a linear manner on the road to the east and the west of the centre.

There has been little development in the village in recent years and therefore Caher has retained a very rural character. There are a number of farm buildings within the settlement boundary and much of the zoned land remains in agricultural use. The village core has a very traditional compact character, with dwellings and outbuildings tightly clustered together and many buildings located directly on the road edge. The TFI Local Link Limerick Clare bus service (C10 Scarriff-Flagmount-Scarriff) stops in Caher twice on Thursdays. The C11 FeakleFlagmount-Tulla-Ennis service stops in Caher twice on Saturdays, while the C7 Flagmount-Derrybrien-Gort service stops twice on Fridays.

Volume 3C Killaloe MD Flagmount Settlement Plan, amend as follows:

Location and Context

Flagmount has an elevated location, with extensive views to the west across Lough Graney. A laneway in the village leads directly to the shores of Lough Graney. It is an agriculture-based village surrounded by undulating farmlands and forested hills in a highly scenic area with recognised ecological value. It is largely surrounded by the Slieve Aughty Mountains and has developed in a scattered linear form. Flagmount is currently served by a local garage/shop, a church and a school with a large pre-school

and after-school care facility. In terms of bus services, the TFI Local Link Limerick Clare C10 (Scarriff-Flagmount-Scarriff service) stops in Flagmount twice on Thursdays. The C11 Feakle-Flagmount-Tulla-Ennis service stops in Flagmount twice on Saturdays, while the C7 Flagmount-Derrybrien-Gort service stops twice on Fridays. The village also sits along the East Clare Way.

Volume 3C Killaloe MD Killanena Settlement Plan, amend as follows:

Location and Context

Killanena comprises a small scattered grouping of buildings centred around a church on the R461. Killanena is situated in the Slieve Aughty Uplands and there are extensive views over the countryside to the east of the village and, in some areas, views over Lough Graney. There has been little development pressure in the area in recent years. The settlement is served by a garage/shop, a local pub and a church/cemetery.

There is no public water supply or wastewater treatment facility serving the village. All existing dwellings and businesses in the village are served by individual bored wells and on-site wastewater treatment systems. It is envisaged that this situation will continue for the foreseeable future.

The TFI Local Link Limerick Clare C10 Bus Service (Scarriff-Flagmount-Scarriff) stops in Killanena twice on Thursdays and the C7 Flagmount-Derrybrien-Gort service stops twice on Fridays.

Volume 3C Killaloe MD Ogonnelloe Settlement Plan, amend as follows:

Location and Context

Ogonnelloe derives its name from Tuath O gCoinghilla, the ancient territory of the O' Duracks. The village is located high above the shores of Lough Derg on the R463 and has a linear structure that stretches along the route for a considerable distance. The village is situated on the Lough Derg Scenic Drive, with several lookout points, one of which has views to Inis Cealtra (Holy Island). Over the years residential development has coveted views across Lough Derg and surrounding mountain ranges making Ogonnelloe an attractive place to live and work-from-home. The services in the village are clustered into two distinct areas. The church and a number of houses are located to the north and the school and GAA grounds are located to the south. Good pedestrian links are provided by the footpath along the R463 which also forms part of the dedicated recreational route from Killaloe to Ogonnelloe. This recreational path is currently being extended to Tuamgraney, and will link with the proposed Shannon Greenway with potential to provide an off road experience connecting Limerick to Tuamgraney and Scarrifff. The TFI Local Link Limerick Clare C2 bus service (Scarriff-Killaloe-Scarriff) stops at the National School twice a day from Monday to Friday.

West Clare MD

Volume 3D West Clare MD, Ennistymon/Lahinch Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

~~Bus Eireann and Local Link provide a regular bus service to and from Kilrush and Ennis. This service~~ Bus Eireann provide a regular bus service serving Ennistymon and Lahinch. TFI Local Link Limerick Clare provides connections to Ennistymon through its

C5 Ennis-Corofin-Lisdoonvarna-Ballyvaughan-Ennistymon service on Tuesdays. These services provide~~s~~ an alternative to the private car for local residents and visitors and encourage~~s~~ a modal shift to a more sustainable transport option.

Transport, Active Travel and Connectivity – Lahinch

As noted above, Bus Eireann ~~and Local Link~~ provide~~s~~ a regular bus service to and from Kilrush and Ennis. This service provides an alternative to the private car for local residents and visitors and encourages a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Kilrush/Cappa Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann and TFI Local Link Limerick Clare provide a valuable bus service to and from Kilrush. The TFI Local Link Limerick Clare R337 Ennis to Kilrush via Kildysart Road operates Monday to Sunday. The R335 Ennis to Kilrush via Quilty operates Monday-Friday and the R339 Kilrush to Loop Head operates Monday to Friday from September to April and Monday to Sunday from May to August. The C19 Kilrush to Cooraclare and Cappa service stops in Kilrush six times on Fridays. This service provides an alternative to the private car for local residents and visitors and encourages a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Kilkee Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann and TFI Local Link Limerick Clare provide a regular bus service to and from Kilrush and Ennis. ~~This~~ These services provide~~s~~ an alternative to the private car for residents and visitors and encourages a modal shift to a more sustainable transport option. The TFI Local Link Limerick Clare R335 Ennis to Kilrush via Quilty operates Monday-Friday and stops at the Bus shelter in Kilkee and the R339 Kilrush to Loop Head operates Monday to Friday from September to April and Monday to Sunday from May to August and stops at the Bus shelter at the Square in Kilkee.

Volume 3D West Clare MD, Lisdoonvarna Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann and TFI Local Link Limerick Clare provide a regular bus service to and from Ennis. Bus Eireann also provides a regular service to Galway City. These services provide an alternative to the private car for residents and visitors and encourages a modal shift to a more sustainable transport option. The TFI Local Link Limerick Clare C5 Ennis-Corofin-Lisdoonvarna-Ballyvaughan-Ennistymon service stops at the square in Lisdoonvarna and the Stella Maris day centre on Tuesdays.

Volume 3D West Clare MD, Miltown Malbay Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann provides a regular bus service to and from Kilrush and Ennis and there is also a Friday and Saturday TFI Local Link Limerick Clare service to Ennis, which stops at Jones's SuperValu in Miltown twice a day on those days. These services provide a valuable connection to other service centres and an alternative to the private car for

residents and visitors and encourages a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Ballyvaughan Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann provide a regular bus service to and from Ennis and Galway City and TFI Local Link Limerick Clare also provide services to Ballyvaughan through its C5 Ennis-Corofin-Lisdoonvarna-Ballyvaughan-Ennistymon service twice on Tuesdays. ~~to Corofin and Ennistymon~~. These services provide a valuable connection to other service centres and an alternative to the private car and encourages a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Corofin Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann provides a regular bus service to and from Galway City, Ennis and Kilkee and TFI ~~Clare~~ Local Link Limerick Clare also provides a regular service to Ennis as well as Lisdoonvarna ~~and Miltown Malbay~~ through its C14 service on Saturdays and C5 service on Tuesdays. While there is an identified need for additional public transport services, the existing services offer the potential to provide an alternative to the private car and encourage a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Doonbeg Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

In terms of public transport, Bus Eireann provide a regular bus service to and from Ennis and Kilkee and ~~Clare~~ TFI Local Link Limerick Clare also provide a daily service Monday to Friday to Ennis and Kilrush through their R335 service. This stops four times a day in Doonbeg. As well as providing a valuable and important connection to other service centres and areas of the County, these services also offer an alternative to the private car and encourages a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Quilty Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann and TFI Local Link Limerick Clare provide a valuable bus service to Quilty. TFI Local Link Limerick Clare provide a daily service from Monday to Friday to Ennis and Kilrush through the R335 service. This stops twice a day in Quilty. This service provides an alternative to the private car for residents and visitors and encourages a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Kilfenora Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

In terms of public transport, Bus Eireann provides a regular bus service to and from Ennis and Kilrush and ~~Clare~~ TFI Local Link Limerick Clare also ~~provides a daily service~~ provides a service on Tuesdays to Ennis and Lisdoonvarna through its C5 route. These existing services have the potential to provide an alternative to the private car for residents and visitors and encourage a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Killimer Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

~~Clare~~ TFI Local Link Limerick Clare provide a regular bus service to and from Ennis and Kilrush. ~~While there is a need for additional public transport services, the~~ The bus stops at the Ferry terminal ten times a day from Monday to Friday and eight times on a Sunday. The existing services offer the potential to provide an alternative to the private car and encourages a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Creegh Settlement Plan, amend as follows:

Location and Context

Creegh is located on the R483 regional route north of Cooraclare and west of Doonbeg. It lies on the northern bank of the Creegh River and Creegh Bridge which provides a picturesque gateway to the village when approaching from the south. The Creegh River flows westerly through the village and is a favourite spot for anglers. The village is centred on the crossroads of the R483 and R484. There are a number of services and facilities in the village including a school, community hall, public houses, a church, shop and fast-food restaurant. ~~The village is also served by the Clare Local Link bus with daily services to Ennis and Kilrush.~~ The village is also served by TFI Local Link Limerick Clare with daily bus services to Ennis and Kilrush. The R335 stops at St. Mary's Church twice a day from Monday to Friday. The C9 service stops in Cree twice on a Thursday. The reuse, redevelopment, or enhancement of existing vacant buildings in the village centre is encouraged as a means of promoting its regeneration and sustainable development.

Volume 3D West Clare MD, Fanore Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

Bus Eireann provides daily bus services to and from Galway City and Ennis, and TFI Local Link Limerick Clare provides a ~~regular bus service to Ballyvaughan, Lisdoonvarna and Ennis~~ bus service to Ennistymon through its C5 on a Tuesday. This stops in Fanore twice on Tuesdays. These services provide a valuable connection to service settlements and an alternative to the private car and encourages a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Inch Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

TFI ~~Clare~~ Local Link Limerick Clare provides a bus service to Ennis on ~~alternate days~~ Fridays and Saturdays through the C12 service. This service provides an alternative to the private car and could help encourage a modal shift to a more sustainable transport option.

Volume 3D West Clare MD, Kilbaha Settlement Plan, amend as follows:

Location and Context

Kilbaha is a small village and is the most southerly and westerly located village on the Loop Head Peninsula. A short distance to the north of Kilbaha lie the Bridges of Ross, a well-known lookout point for bird watchers observing the seasonal migrations. Kilbaha

has a small harbour that is overlooked by the ruin of Doondalhen House which dominates the bay area and is a prominent feature in the village landscape. Further west along the peninsula lies Loop Head Lighthouse which is open to the public.

Kilbaha has a distinctive picturesque coastal setting with outstanding views that need to be protected. A high ridge to the west of Kilbaha along the R487 allows for excellent views of the landscape to the north and the Atlantic Ocean beyond. Outstanding views of Kilbaha Bay, the Shannon Estuary and rocky coastline contribute to the main character of the settlement.

Kilbaha offers a high-quality environment in which to live. It is important to provide for small scale well-designed development as well as year-round facilities and services that promote a thriving village centre while retaining Kilbaha's distinctive village character and setting.

The settlement has developed in a linear form with the main services located centrally around the bay. It is a priority to ensure the continued viability of the existing services, which includes two pubs (Keating's pub and the Lighthouse Inn), a community hall and a playground. Kilbaha Gallery and Crafts is located less than a kilometre west of the village centre and Kilbaha church, which houses the Church of the Little ~~Arc~~ Ark, is less than a kilometre to the northwest.

The village is also served by TFI ~~Clare~~ Local Link Limerick Clare with daily bus services to Kilrush and Kilkee on the R339 ~~and Clare Bus with daily services to Kilrush and Kilkee~~ and onward services to Ennis.

Volume 3D West Clare MD, Kilmurry McMahon Settlement Plan, amend as follows:

Location and Context

Kilmurry McMahon is a small village, centred on St. Mary's Church, and consists of a small cluster of houses and farm buildings. There is a shop and post office at the junction with the R473 to the south of the settlement and a primary school and community centre to the north of the village, which provide services to residents of the village and the wider rural hinterland.

Kilmurry McMahon offers a high-quality rural environment for those seeking to live in the countryside and is also a convenient distance from Kilrush. It is a traditional crossroads village situated on the R485, a busy commuter route to Ennis and Shannon. There is an existing public footpath connecting the school and community centre. Kilmurry McMahon is well served by the TFI Local Link Limerick Clare R337 bus service ten times a day from Monday to Saturday and twice on a Sunday. The bus stops at Morrissey's Post Office.

General Objectives:

- To encourage the incremental and small-scale expansion of the settlement that is relative and appropriate to the scale, size and character of the population and services in the village;
- To support the provision of infrastructure to allow for future growth of the village;
- To support traffic calming in the village in order to address traffic and pedestrian safety;

- To improve the footpath network in the village, in particular linking the national school to the village centre, shop and post office; and

- ~~To support the Local Link Rural Transport strategy including the development of direct rural bus links from Kilmurry McMahon to larger settlements such as Ennis and Kilrush; and~~

- To support the development of a settlement network along the Shannon Estuary including Kilmurry McMahon along with Ballynacally, Killadysert, Knock, Labasheeda and Killimer, to assist collaborative projects and the sharing of assets and strengths including developing its economic and tourism potential as a stopping point on the Shannon Estuary Way.

Volume 3D West Clare MD, Knock Settlement Plan, amend as follows:

Location and Context

Knock is a small village nestled on the shore of the Shannon Estuary ~~centred~~ centered on a small quay and sheltered by a high ridge to the north. It has a unique character due to its attractive setting. As one approaches the settlement from the east, there is a descent into the village levelling out almost at water level along the coast road. Extensive views are afforded across the Shannon Estuary, Clonderlaw Bay and the Kilkerrin Peninsula. The high ridge to the north of the settlement provides a contrasting backdrop.

Knock's idyllic and tranquil setting on the estuary, located a short distance from Killimer and Kilrush, offers a high-quality living environment for those seeking to experience rural life.

The village consists mainly of close-knit residential buildings and has two public houses. It is served by ~~Clare~~ TFI Local Link Limerick Clare with regular bus services to Ennis and Kilrush through the R337 which stops at The Fisherman's Hut nine times a day Monday to Saturday and four times on a Sunday. There are several vacant buildings in the village centre and the reuse, redevelopment or enhancement of these is encouraged as a means of regenerating the village centre and promoting sustainable development. There is a need to ensure pedestrian connectivity to existing facilities within the village, therefore the provision of a public footpath is supported.

Volume 3D West Clare MD, Labasheeda Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

TFI Local Link Limerick Clare provides a regular bus service to Ennis and Kilrush which provides a valuable connection to the County town and also offers an alternative to the private car and encourages a modal shift to a more sustainable transport option. The service is the R337 and stops at St. Kieran's church ten times a day from Monday to Saturday and four times a day on a Sunday.

Volume 3D West Clare MD, Lissycasey Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

In terms of public transport, Bus Eireann and TFI Local Link Limerick Clare provide regular bus services to and from Ennis and Kilrush. These services provide a valuable

connection to the service towns and an alternative to the private car for residents and visitors and encourages a modal shift to a more sustainable transport option. The TFI Local Link Limerick Clare service is the R335 Ennis-Quilty-Kilrush and stops at the cemetery and Fanny O'Dea's bar twice a day from Monday to Friday. The C19 service on Fridays stops in Lissycasey twice that day.

Volume 3D West Clare MD, Moyasta Settlement Plan, amend as follows:

Transport, Active Travel and Connectivity

In terms of public transport, Bus Eireann provide a regular bus service to and from Ennis and Kilkee and people in Moyasta can hail the TFI Local Link Limerick Clare buses who also provide a daily service to Ennis and Kilrush. As well as providing a valuable and important connection to other service centres and areas of the County, these services also offer an alternative to the private car for residents and visitors and encourages a modal shift to a more sustainable transport option.

Submission No: S2/946 –Patrick, Geraldine, Sinead, Roisin & Padraig Lafferty	
Relevant Chapters / Topics	• **Wind Energy**

Summary of Issues Raised in Submission

This submission relates to lands zoned for wind energy development.

- The zoning is no longer suitable with turbines nowadays 4 times the size of a standard turbine at the time when these lands were zoned.
- An application for a windfarm at Slieveacurry, Miltown Malbay, has been repeatedly turned down and therefore these lands should now be rezoned for other development.
- Offshore wind energy should be considered.
- Suggests enforcement procedures should be looked at when it comes to windfarms not complying with planning conditions.

Chief Executive's Response

I thank Patrick, Geraldine, Sinead, Roisin and Padraig Lafferty for the submission.

The Wind Energy Strategy is included as Volume 6 of the draft Development Plan and there is a commitment through the inclusion of a specific objective in both the draft Renewable Energy Strategy in Section 6.6 Policy Provision and in Volume 1, objective CDP 11.47 Renewable Energy of the draft Plan to prepare a new Wind Energy Strategy for the County during the lifetime of the plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities. The preparation of a new Wind Energy Strategy will involve a review of the exiting WES in developing future policy for the county.

Off-shore wind energy is recognised as a significant renewable energy source which will become increasingly prevalent in the years to come and will form part of a new County Wind Energy Strategy. In the draft Plan and the RES there is a commitment through policy support to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, upon the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

I note the Maritime Area Planning Act 2021 (MAP Act) was signed into law on the 23rd of December 2021. This legislation represents the biggest reform of marine governance since the foundation of the State and demonstrates the Government's commitment to prioritising the strategy for Offshore Wind Energy in terms of reform. The Act establishes a comprehensive and coherent marine planning system including the establishment of the Maritime Area Regulatory Authority (MARA) a dedicated agency to undertake certain consenting and enforcement functions in the new regime. It is hoped that MARA will become operational in Q1 of 2023 at which point it will be possible to commence consenting of Offshore Renewable Energy projects under this new regime. Clare County Council have actively inputted to, supported and promoted the development of the MAP Act and the establishment of MARA and will continue to ensure it is operational in 2023.

With regard to Enforcement, there are a number of regulatory provisions set out within the Planning and Development Act 2000 (as amended) and is a matter which does not fall within the development plan making process.
Chief Executive's Recommendation
I recommend that no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/947 –Pat & Fiona Hartigan	
Relevant Chapters / Topics	• **Wind Energy** • **Land Use Zoning** • **Shannon Municipal District**

Summary of Issues Raised in Submission

This submission relates to lands zoned as strategic for wind energy developments particularly in the areas of Meelick/Ardnacrusha.

- What was the criteria used to designate this area as strategic for windfarms.
- This area is not appropriate for the proposed Ballycar Green Energy project or any other windfarm as it is a densely populated area and health issues would be a concern.
- The impact on wildlife and the natural habitat.
- Has an analysis of offshore versus onshore wind been undertaken as part of decision making for these designations.
- To look at Moneypoint to become a large floating windfarm and transform it into a green energy hub.
- To look at the benefits of offshore wind farms.

Chief Executive's Response

I thank Pat and Fiona Hartigan for the submission.

I note the criteria for defining areas for wind farm development are set out in section 2.6.1 of the Wind Energy Strategy (Volume 6) of the draft Development Plan.

The draft Plan also includes objectives CDP 3.1 Appropriate Assessment (AA), Strategic Environmental Assessment (SEA) and Strategic Flood Risk Assessment (SFRA) and CDP 11.47 Renewable Energy outline the requirement for the draft CDP and associated supporting volumes (including Volume 5, Clare Renewable Energy Strategy) to comply with all relevant EU Directives including the Habitats Directive, Birds Directive and the Water Framework Directive and all relevant transposing national legislation. Furthermore, it is an objective of Clare County Council to support the sustainable development of renewable wind energy at appropriate locations, and in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment, and protected habitats and species, and to assess proposals having regard to associated SEA and AA.

In accordance with the requirements of the Department of Environment, Community and Local Government as set out in Circular PL20-13, the current Clare Wind Energy Strategy 2011-2017 is not being reviewed as part of the preparation of this draft Plan. Within the draft Plan, CDP11.47 Renewable Energy and the draft Renewable Energy Strategy Section 6.6, there is a commitment made through policy support to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, upon the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

Off-shore wind energy is recognised as a significant renewable energy source which will become

increasingly prevalent in the years to come and will form part of a new County Wind Energy Strategy. In the draft Plan and the RES there is a commitment through policy support to prepare a new updated Wind Energy Strategy for the County during the lifetime of the plan, upon the publication of the update to the Wind Energy Development Guidelines for Planning Authorities.

I note the Maritime Area Planning Act 2021 (MAP Act) was signed into law on the 23rd of December 2021. This legislation represents the biggest reform of marine governance since the foundation of the State and demonstrates the Government's commitment to prioritising the strategy for Offshore Wind Energy in terms of reform. The Act establishes a comprehensive and coherent marine planning system including the establishment of the Maritime Area Regulatory Authority (MARA) a dedicated agency to undertake certain consenting and enforcement functions in the new regime. It is hoped that MARA will become operational in Q1 of 2023 at which point it will be possible to commence consenting of Offshore Renewable Energy projects under this new regime. Clare County Council have actively inputted to, supported and promoted the development of the MAP Act and the establishment of MARA and will continue to ensure it is operational in 2023.

Chief Executive's Recommendation

I recommend no amendment to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/950 –Colin B Peirce	
Relevant Chapters / Topics	• **Wind Energy** • **Land Zoning** • **Shannon Municipal District**

Summary of Issues Raised in Submission

This submission relates to the designation of lands in the Gallows Hill, Woodcock Hill and Ballycar Hill areas as "Strategic Wind Turbine" and request that Clare County Council:

- Remove the wind farm zoning.
- Refuse any applications for wind turbine development under current Plan.
- To place the needs of residents before profit.
- Acknowledge that 0 risk is the only acceptable risk in relation to landslides and aviation safety.
- To learn from past disasters (eg Derrybrien, Meenbog) and to protect the environment.
- The government strategy for offshore wind energy should be the way forward.
- To ensure Woodcock Hill Bog and its surrounding areas are protected.
- To protect the hen harrier and other species.
- To recognize the impact wind turbines have on residents due to noise, flicker and destruction of visual amenity.

Chief Executive's Response

I thank Colin Peirce for the submission.

It is not appropriate to discuss individual planning applications within the context of the plan preparation process. Every planning application is considered within the policy objectives of the Development Plan in place at the time of a proposal being submitted to the Planning Authority and dealt with on a case-by-case basis through the development management process.

The analysis carried out for the Draft RES follows the SEAI LARES methodology, and as a result is concerned with high-level mapping at County level. It does not purport to be as accurate or detailed as the research expected for a specific project, and therefore further comment on the specific merits/characteristics of an individual site - for example in relation proximity to housing, or in relation to ecological sensitivity - is beyond the scope of the Draft RES. General safeguards on amenity and environmental protection are included in Section 17 of the Draft RES.

The Climate Action Plan 2021 has established targets in terms of both onshore and offshore renewable energy generation. It is acknowledged that the deployment of onshore renewable energy technologies represents a quicker method of achieving our national renewable energy targets in the short-to-medium term, and the technical assessment of strategic wind energy potential is clearly set out within the Draft RES. Offshore renewable energy intends to secure Ireland's energy requirements in the long term.

In accordance with the requirements of the Department of Environment, Community and Local Government as set out in Circular PL20-13, the current Wind Energy Strategy has not been reviewed as part of the preparation of this Draft plan. As per the Draft RES Section 6.6, and Objective CDP

11.47 of Volume 1 of the Draft Plan the Planning Authority is committed to reviewing the WES once the revised Wind Energy Development Guidelines are issued.
Chief Executive's Recommendation
I recommend no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/971 –Cllr Joe Killeen	
Relevant Chapters / Topics	• **Population Targets**

Summary of Issues Raised in Submission

This submission relates to national and regional population targets.

Disappointment is expressed in the submission at unambitious targets under Table 3.2. The increase in population is insufficient to ensure a strong vibrant population outside of Limerick, Shannon, Ennis areas. Rural areas, small towns and villages, need greater scope for development and population increase than what is allocated. The plan must provide better support for rural areas especially for those wanting to relocate to the country post-pandemic which will result in an increase in population during the lifetime of the plan.

Population projections for a number of settlements are noted including Miltown Malbay, 43 units, Lisdoonvarna of 44 units (85 people), Corofin 37 units (63 people), Kilfenora 13 units (25 people) and Ballyvaughan is 15 units (29 people). Considers these projections are insufficient to allow villages to regenerate, sustain, meet housing needs and to ensure services are kept.

Chief Executive's Response

I would like to thank Cllr Joe Killeen for the submission which relates to population targets.

I note the points made in relation to the population projections for settlements in North Clare, it is the role of the Clare County Development Plan 2023-2029 to provide a plan-led approach for the balanced and sustainable development of the County which is in accordance with national (NPF) and regional (RSES) policy. The core strategy, settlement strategy and settlement hierarchy are central components of the development plan in terms of identifying the amount and location of population growth to be delivered during the plan period. They link in with and support policies and objectives throughout the plan to ensure that in addition to being centres of population, the settlements also deliver on their roles as employment and service centres. The population allocation for settlements in North Clare identified in the Draft Plan is proportionate with other settlements in the County within the same tier as identified in the Settlement Hierarchy in Chapter 3 of Volume 1 i.e. Service Town, Small Towns etc.

Chief Executive's Recommendation

I recommend that no amendment is made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/972 –Michael Leahy	
Relevant Chapters / Topics	• **Volume 1 Written Statement** • **Core Strategy** • **Housing** • **Tourism** • **DM Guidelines** • **Brownfield/Infill Sites** • **Mixed Use**

Summary of Issues Raised in Submission

This submission relations to a number of topics as listed.

Core Strategy (Chapter 3)

- Where previous allocations for towns/villages have not been achieved that the previous allocation be added to the upcoming allocation. Should also apply to rural areas.
- That previously zoned undeveloped land should remain zoned to accommodate the proposed population growth over the forthcoming 6 years.
- Suggest for smaller towns/villages that the amount of land zoned be increased so that a minimum of twice the estimated necessary land is actually zoned.
- And secondly, each site should be examined to determine whether there are any issues that would preclude development. While adequate land may have been zoned to accommodate population growth, difficulties may arise during the application process, where permissions are not granted.

Housing (Chapter 5)

- Refers to Objective CDP 17.7 for the facilitation of housing in town centres and for the development of brownfield site and conversion of existing buildings over commercial premises.
- Conversion of properties over commercial premises can be difficult when it comes to providing for open space and carparking spaces in accordance with guidelines. Suggests that development contributions be made in lieu where site/building constraints do not allow for such provision.
- Another alternative is that the proposed apartments are provided above minimum standards of floor area with the excess area being regarded as private recreation though not open space.

Tourism (Chapter 9)

- Outside of Wild Atlantic Way the largest concentration of scenic routes is the Burren area.
- Suggests introducing a route bringing tourists from Wild Atlantic Way to this area.

Development Management Guidelines (Appendix 1)

- Suggests setting a 50% target for provision of electrical charging points in public car parks.
- Suggests that carpark standards, particularly in town centres, are still very high, when the proposed 10 minute town strategy is taken into account;

- Under A.1.6.3 the requirement for 2.5m-wide parking bays is above that recommended under DMURS;
- The requirement of providing accessible shower and toilet to ground floor of all houses is a substantial requirement and well in excess of part M of building regulations. This will increase the ground floor footprint and increase overall building cost.
- Suggests that where the ground floor is less than 60m2 there is a requirement to indicate how a shower/toilet could be accommodated by a future extension.

Brownfield & Infill Site Development (page 446)

- Suggests that the last sentence in first paragraph be extended to include infill sites as well as brownfield as follows:
  "due to the potential additional issues associated with brownfield redevelopment and development of infill sites relative to the development of other locations, a flexible approach may be taken by the planning authority "
- Suggests the term brownfield be defined to include reclaimed land in town centre locations.

Mixed-Use (page 429)

- Under this description would suggest the following paragraph be added:
  "The Planning Authority recognises that in smaller sites at edge of town locations a variety of uses may not be possible or economically feasible and where single use is justified by the applicant/developer the Planning Authority may take a flexible approach on this matter."
- Particularly in smaller site, the development of commercial space may be difficult to achieve. The adoption of a more flexible approach on this matter is likely to see a greater uptake on these sites.

Chief Executive's Response

I wish to thank Michael Leahy for the submission and address the issues raised as follows:

Core Strategy (Chapter 3)

It is the role of the Clare County Development Plan 2023-2029 to provide a plan-led approach for the balanced and sustainable development of the County which is in accordance with national (NPF) and regional (RSES) policy. The core strategy, settlement strategy and settlement hierarchy are central components of the development plan in terms of identifying the amount and location of population growth to be delivered during the plan period. They link in with and support policies and objectives throughout the plan to ensure that in addition to being centres of population, the settlements also deliver on their roles as employment and service centres.

In this regard, the extent of land zoned for future residential use within any settlement is determined by the Core Strategy as set out in Volume 1 of the Draft Development Plan. In determining the location and distribution of residentially zoned land, the Core Strategy is consistent with 'Guidance notes on Core Strategy Nov 2010' together with the provisions and conclusions of the SFRA, the SEA and the AA process. In addition, site specific land use issues

were considered. These criteria include, inter alia, the availability of services, a sequential test, flood risk assessment, planning history, consolidation of urban form etc. In accordance with the Core Strategy, I am satisfied that a sufficient quantum of land has been zoned at appropriate locations within the settlements of Co. Clare to accommodate the required amount of housing units to meet the needs of the allocated population growth for the county over the plan period 2023-2029.

In addition to zoning which satisfies Core Strategy requirements, Strategic Residential Reserve zoning has been included in many of the settlements. Section 19.4 Nature of Zonings, Chapter 19, Volume 1 of the Draft Plan, notes that while the Strategic Residential Reserve zoning is intended to ensure the protection of appropriate lands for the long-term expansion of settlements, consideration may also be given to the development of some of these lands before the end of the current plan period if required. I do not propose to amend the Draft CDP on this issue.

Housing (Chapter 5)

The comments made in the submission regarding the facilitation of housing in town and village centres are noted. The submission cross-references to Objective CDP17.7 'Town and Village Centre Vacancy' which is in Chapter 17 'Towns and Villages'. I also note the provisions of Article 10(6) of the Planning and Development Regulations 2001 (as amended), which provide for changes of use from vacant commercial to residential to be carried out in certain circumstances as Exempted Development. These circumstances appear to align with the scenario set out in the submission.

As regards Development Contributions, the Council has prepared a schedule of development contributions in accordance with its obligations under Sections 48 and 49 of the Planning and Development Act, 2000 (as amended) and having regard to 'Development Contribution Scheme – Guidelines for Planning Authorities' (DoEHLG 2013). The Development Contribution Scheme in place is for the period 2017-2023 and is not a component of the Development Plan, and therefore not subject of review under the Draft CDP consultation under which the submission has been made. Consequently, the Scheme cannot be amended as a result of the submission. However, I note that Section C(1) of the Scheme concerns Car Parking and states that Contributions are payable in respect of car parking where the developer is unable to meet the requirements with regard to car parking as set out in the County Development Plan in force at the date of decision on an application for permission. The rate per space, where the car parking requirement cannot be met by direct provision, is €1000. I do not propose to amend the Draft CDP on this issue.

In its evaluation of planning applications that include residential apartments, the Planning Authority is required to have regard to the 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' (December 2020). These Guidelines include minimum standards for private amenity space for apartments. I do not propose to amend the Draft CDP on this issue.

Tourism (Chapter 9)

I acknowledge the comments made in relation to the prevalence of Scenic Routes at roads in the hinterland of Corofin. I consider that the development of tourism in this area has been given adequate policy support in the Draft CDP with the inclusion of Objective CDP9.24 Tourism in North Clare and The Burren. I do not propose to amend the Draft CDP on this issue.

Development Management Guidelines (Appendix 1)

In relation to the suggested setting of a 50% target for provision of electrical charging points in public car parks, I consider that the scenario set out in the submission would relate mostly to retrofitting of charge points to existing car parks, and would apply exclusively to public car parks. Therefore, setting a target in the Draft CDP would be inappropriate because the Development Management Guidelines are applicable to the Planning Authority's assessment, through its Development Management function, of new development being brought forward for planning consent. I do not propose to amend the Draft CDP on this issue.

I note the comments made in relation to car parking standards, particularly in town centres, and I have recommended amendments to these standards. My recommendations are set out in my response to the submission by the National Transport Authority (S2/625).

I note that the apparent discrepancy between DMURS and A.1.6.3 in the Draft CDP is due to the Draft CDP setting a requirement for 2.5m-wide parking bays, which is above the 2.4m recommended under DMURS. I consider that the Draft CDP provides for an acceptable standard of development, and I do not propose to amend the Draft CDP on this issue.

Regarding the requirement in Objective CDP5.12 'Accommodation for people with disabilities' that an accessible shower and toilet is provided within the ground floor of all new residential buildings, I consider that this is an appropriate stipulation in relation to all residential units at/with a ground floor. Designing for universal access is a requirement that is compatible with ensuring adequate housing choices for those with disabilities as well as the elderly demographic. I do not propose to amend the Draft CDP on this issue.

At Appendix 1 (DM Guidelines) Section A1.4.2 Urban Residential Development, the submission seeks a change to the parameters for brownfield and infill site development. The relevant context appears (to me) to be where the site is zoned Mixed Use and is within a town or village centre. On such sites, the Draft CDP allows for a relaxation from the normal requirements for Mixed Use (i.e. a mix of uses) where the lands are brownfield in nature. The submission seeks that the relaxation also applies to the same type of site where it is infill rather then brownfield. I consider that while brownfield sites are easily identifiable, infill sites are less so and could be taken to comprise of large tracts of centrally-located undeveloped / greenfield land that are zoned Mixed Use. If a single-use development was permitted on lands of that nature, the effect on the overall settlement could be a negative one, as it could for example, constrain residential development on appropriately zoned sites elsewhere in the settlement, or detract from the vibrancy or vitality of the centre of the settlement by preventing the orderly expansion of town centre uses onto a site that would have been ideally located for that purpose. I do not propose to amend the Draft CDP on this issue.

Regarding the suggestion that the term brownfield be defined to include reclaimed land in town centre locations; I consider that there is not sufficient evidence available to the Council to enable it to categorise lands in this way. I do not propose to amend the Draft CDP on this issue.

Additionally, at Appendix 1 (DM Guidelines) Section A1.4.2 Urban Residential Development, I note a reference within 'Apartment Developments' to the 'Design Standards for New Apartments - Guidelines for Planning Authorities' (2018) (or as updated/superseded). The Guidelines have been updated and I recommend the amendment of the Draft CDP accordingly.

The submission seeks that a paragraph be added to the description of Mixed-Use at Chapter 19 Section 19.4 'Nature of Zonings'. The paragraph would allow for 'smaller sites at the edge of towns' to be developed as a single use. I consider that where Mixed Use zoned lands exist at the centre of a settlement, it is a recognition of the existing pattern of development and the desire to augment that with a diverse range of uses. The description in the Draft CDP is consistent with that and includes:

> On lands that have been zoned 'mixed-use' in or near town or village centres, a diverse range of day and evening uses is encouraged and an over-concentration of any one use will not normally be permitted.

Where Mixed Use lands have been zoned outside the centre of a settlement, it is often intended that the site would be capable of serving as a neighbourhood centre (for example) for a wider area that might be characterised by a pattern of single use, e.g. residential. In the interests of facilitating the sustainability of communities, I do not consider it appropriate to include for a relaxation from requiring a mix of uses on Mixed Use-zoned lands at the edge of settlements.

Chief Executive's Recommendation

Amend Appendix 1 (DM Guidelines) Section A1.4.2 Urban Residential Development, as follows:

> Apartment Developments
>
> The Planning Authority, in assessing proposals for apartment developments, will have regard to the 'Design Standards for New Apartments - Guidelines for Planning Authorities' ~~(2018)~~ 2020 (or as updated/superseded) and the 'Urban Development and Building Height Guidelines' (2018). All new apartment developments shall accord with or exceed the minimum floor areas indicated in these guidelines.

Submission No: S2/973 –Cllr John Crowe	
Relevant Chapters / Topics	• **Theme Parks**
Summary of Issues Raised in Submission	
This submission relates to the promotion and development of theme parks which export our national heritage and culture thereby creating sustainable long-term employment with economic and social advantage.	
Chief Executive's Response	
I wish to thank Cllr John Crowe for the submission and I respond as follows. Bunratty is identified as a location where such a tourism facility could be provided and significant lands are zoned for tourism purposes. Bunratty already has a strong tourism offering that could be built on and is strategically located on the N18, with close links to Shannon International Airport. The Plan includes objective CDP 9.22(c) which states c) To support the development of a flagship, international scale tourism project in Bunratty; I believe this objective is sufficient to cater for a theme park type development and it is preferable that such a development would progress in a plan-led manner rather than a general objective applicable across the county.	
Chief Executive's Recommendation	
I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.	

Submission No: S2/984 –Michael & Sheila Ryan	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission is in relation to the creation of a new interchange on the M18 at Quin Road, Ennis as noted in Section 11.2.9.1 of the Draft Plan. A map and supporting documentation is included with this submission. Requests that this proposal should be removed based on:

- Significant impact on residents of Hogan's Way.
- Experience of the non-completion of N18 Ennis Bypass.
- Incompatible design of M18
- Adequate access to M18
- Better alternatives at lower cost and local impact.
- Impact on local walkways.

Chief Executive's Response

I thank Michael and Sheila Ryan for the submission and address the issues raised below:

The Core Strategy of the draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft Limerick and Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the Draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the Draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/985 –J & U Salim	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission is in relation to the creation of a new interchange on the M18 at Quin Road, Ennis as noted in Section 11.2.9.1 of the Draft Plan. A map and supporting documentation is included with this submission. Requests that this proposal should be removed based on:

- Significant impact on residents of Hogan's Way.
- Experience of the non-completion of N18 Ennis Bypass.
- Incompatible design of M18.
- Adequate access to M18.
- Better alternatives at lower cost and local impact.
- Impact on local walkways.

Chief Executive's Response

I thank J & U Salim for the submission and address the issues raised below:

The Core Strategy of the Draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the Draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the Draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the Draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/986 –Sean & Julie Hegarty	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission is in relation to the creation of a new interchange on the M18 at Quin Road, Ennis as noted in Section 11.2.9.1 of the Draft Plan. A map and supporting documentation is included with this submission. Requests that this proposal should be removed based on:

- Significant impact on residents of Hogan's Way.
- Experience of the non-completion of N18 Ennis Bypass.
- Incompatible design of M18.
- Adequate access to M18.
- Better alternatives at lower cost and local impact.
- Impact on local walkways.

Chief Executive's Response

I thank Sean and Julie Hegarty for the submission and address the issues raised below:

The Core Strategy of the draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the Draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the Draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the Draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/987 –James & Aoife Breslin	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission is in relation to the creation of a new interchange on the M18 at Quin Road, Ennis as noted in Section 11.2.9.1 of the Draft Plan. A map and supporting documentation is included with this submission. Requests that this proposal should be removed based on:

- Significant impact on residents of Hogan's Way.
- Experience of the non-completion of N18 Ennis Bypass.
- Incompatible design of M18.
- Adequate access to M18.
- Better alternatives at lower cost and local impact.
- Impact on local walkways.

Chief Executive's Response

I thank James and Aoife Breslin for the submission and address the issues raised below:

The Core Strategy of the Draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the Draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the Draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the Draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/988 –Mark McNamara	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission is in relation to the creation of a new interchange on the M18 at Quin Road, Ennis as noted in Section 11.2.9.1 of the Draft Plan. A map and supporting documentation is included with this submission. Requests that this proposal should be removed based on:

- Significant impact on residents of Hogan's Way.
- Experience of the non-completion of N18 Ennis Bypass.
- Incompatible design of M18.
- Adequate access to M18.
- Better alternatives at lower cost and local impact.
- Impact on local walkways.

Chief Executive's Response

I thank Mark McNamara for the submission and address the issues raised below:

The Core Strategy of the Draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the Draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the Draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the Draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/989 –Jim Lyons	
Relevant Chapters / Topics	• **Ennis** • **M18 Interchange at Quin Road** • **Transport**

Summary of Issues Raised in Submission

This submission is in relation to the creation of a new interchange on the M18 at Quin Road, Ennis as noted in Section 11.2.9.1 of the Draft Plan. A map and supporting documentation is included with this submission. Requests that this proposal should be removed based on:

- Significant impact on residents of Hogan's Way.
- Experience of the non-completion of N18 Ennis Bypass.
- Incompatible design of M18.
- Adequate access to M18.
- Better alternatives at lower cost and local impact.
- Impact on local walkways.

Chief Executive's Response

I thank Jim Lyons for the submission and address the issues raised below:

The Core Strategy of the Draft County Development Plan includes 'Relevant Plans, Policies and Strategies' at Section 3.3. That section sets out the plans and strategies at national, regional and local level that have been taken into consideration in the preparation of the Development Plan. Those include the NPF, RSES, the draft Limerick and Shannon Metropolitan Area Transport Strategy (LSMATS) and adjoining Local Authorities' Development Plans. Within the Regional Spatial and Economic Strategy (RSES) Ennis is designated as a Key Town. The "provision of a new access to the motorway from the Quin Road to alleviate significant heavy traffic from the town" is listed as a Key Infrastructural Requirement for Ennis in the RSES. The RSES also contains a series of Regional Policy Objectives (RPOs). RPO 167 identifies the National Roads Projects for delivery in the period up to 2027. 'New Interchange M18 Quin Road Ennis' is listed among the projects. I consider that to give effect to the RSES and RPO167 in particular, it is necessary that the Draft CDP includes policy provision for a new interchange on the M18 at the Quin Road in Ennis. Therefore, I do not propose to change the Draft CDP in relation to this request.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/994 –Cllr PJ Kelly	
Relevant Chapters / Topics	• **Theme Parks** • **Rural Housing**

Summary of Issues Raised in Submission

- Suggests the Plan promotes the development of theme parks to help create employment and social advantage.
- To clearly define terms "appropriate", "inappropriate" and "will be considered".
- Consideration for persons either born or who have lived at least 10 years in an area of population decline for permissions to be considered under health and safety.
- Explain how
  (a)economic impact is assessed in the different areas where it is referenced as a consideration factor
  (b)where it results in a growth different areas
  (c)where it results in a refusal in different areas
- Suggests amending the 15ha land limit for farmers with following:
  "The CDP recognizes as farmers all those who have a herd number, equine number or a landholding which produces agri-food or vegetables".
- Suggests removing the word "allocation" and replace with "projection".
- Suggests removing sections of roads which pass through areas of declining population from scenic route list.

Chief Executive's Response

I wish to thank Cllr. PJ Kelly for the submission and I respond as follows.

<u>Theme Park</u>
Bunratty is identified as a location where such a tourism facility could be provided, and significant lands are zoned for tourism purposes. Bunratty already has a strong tourism offering that could be built on and is strategically located on the N18, with close links to Shannon International Airport.
The Plan includes objective CDP 9.22(c) which states:
c) To support the development of a flagship, international scale tourism project in Bunratty;
I believe this objective is sufficient to cater for a theme park type development and it is preferable that such a development would progress in a plan-lead manner rather than a general objective applicable across the county.

<u>Definitions</u>
Appropriate – suitable or proper in the circumstances
Inappropriate – not suitable or proper in the circumstances
Will be considered – thought will be given

<u>Rural Housing</u>
The assessment of planning applications for rural dwellings is carried out in accordance with the

"Sustainable Rural Housing Guidelines" (2005) and the "Development Management Guidelines" (2007).

Item 4
I am unclear in relation to item 4 as to the context of the question, economic impact is used once in Volume 1 of the Draft Development Plan stating, "Air pollution can potentially affect the health and well-being of sensitive population groups and eco-systems and can also have adverse environmental and economic impacts".
It may be that the question refers to the Development Management process which is an operational issue rather than a CDP issue.

Item 5
Noted, the reference to farm holding size is 12.5ha as contained with the Draft Plan, Chapter 4. It is deemed appropriate to stipulate a landholding size in the interest of clarity and fairness.

Item 6
The word allocation has been removed from the Core Strategy table and the word target used instead.

Chief Executive's Recommendation

I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Submission No: S2/998 –Arts Council	
Relevant Chapters / Topics	• **Arts and Culture**

Summary of Issues Raised in Submission

The submission relates to the facilitation and preservation of the arts and culture in thecounty.

- Can contribute towards community development and enhance the physical and economic value of an area.
- Can create vibrant places to live and create social cohesion through festivals and events.
- Given that it integrates across policy areas requires articulation in the Development Plan that compliments County's Arts Plan.
- Covid-19 has shown the need for the provision of functional indoor and outdoor spaces that can provide for a diversity of activities which should be considered in the Plan.
- Welcomes that the Draft Plan makes provisions for the development of arts/ culture infrastructure as referenced in Chapter 10 and Chapter 16 and as the recognition as stated in Section 10.11.
- Also welcomes the intentions of Appendix 9 and that it is directly applicable to provision of arts/culture development during the life of the Plan.
- The provisions could be further enhanced by greater synergy between the County Arts Plan objectives and the Development Plan by providing development beyond the workspaces/hubs facilities.
- Suggests including a policy objective acknowledging the role of County Arts Development Plan 2019-2023 and support implementation of Strategic Priority 3.
- Supports the provisions of Objective CDP10.9 which seeks to facilitate the development of programmes and activities.
- Suggests including objectives which recognizes art and culture as an important part of community and to facilitate provision of indoor and outdoor spaces that can enable formal and informal community engagement.
- Suggests a policy objective for the provision of community facilities, including the provision of infrastructure, is informed by an evidence based needs assessment. It is aware that this evidence based approach is recommended in Draft Guidelines.
- For further evidence based decision make a county register of arts and cultural assets could be established. This information could be mapped spatially and then used to to identify locations.

Chief Executive's Response

I wish to thank the Arts Council for the submission, and I want to acknowledge the value of the Arts and Culture to the development and promotion of County Clare.

The Draft Plan provides support to for the development of Arts and Culture, and it is an objective of the Plan to work with relevant stakeholders including the Arts Council in the further development of the Arts and to support the implementation of these strategies. I am aware of the current Clare County Council Arts Strategy 2019 - 2023 and I consider that the Development Plan should provide policy support for this strategy and subsequent revisions to same. I believe it important to ensure that the intrinsic, social, educational and economic value of arts is

communicated, well understood and appreciated by existing and potential stakeholders and communities.

I am satisfied that Section 10.11 Arts, Culture & Language recognizes the importance of the Arts and Culture to local communities, and I consider it is appropriate to include an objective to support the development of indoor and outdoor spaces that can enable formal and informal community engagement.

In relation to the provision of community facilities, I would note that the role of the county development plan is to facilitate and support such development at appropriate locations in the county. In this regard I am satisfied that the policies and objectives of the Draft Plan provide policy support for such community facilities. For example, Section 10.2 Sustainable and Inclusive Communities and its associated Objective CDP10.1 Sustainable Communities b) To work in collaboration with all relevant stakeholders to facilitate the planning and delivery of accessible community facilities throughout the County, and Objective CDP 16.15 Museums, Heritage and Cultural Centres (e) To support the development of a network of community arts and cultural hubs.

I also acknowledge the points made in relation to the benefits of a county register of arts and cultural assets and spatial mapping of same, and I consider it would be useful. However, I consider this is a matter for the Clare County Council Arts Office.

Chief Executive's Recommendation

I recommend that objective CDP 10.9 is amended to include support for the Clare County Council Arts Strategy as follows:

Development Plan Objective: Arts and Cultural Development	
CDP10.9	It is an objective of Clare County Council: a) To develop programmes that support the arts and people's experience of the arts both as participants and audience members; b) To support and to seek investment for the development of a network of workspaces/hubs and display facilities for visual arts works throughout the County for artists, artistic organisations and community groups; c) To support the implementation of the Clare County Council Arts Strategy 2019-2023 and subsequent revisions. ~~c)~~ d)To support cultural and entertainment activities in the County by operating within the national cultural policy framework 'Culture 2025' and by co-operating with the Arts Council of Ireland, community groups and other bodies; and ~~d)~~ e)To support the events and activities that allow people from different cultures to meet and learn about their different traditions, music, food, religions etc. in order to support the development of an open, inclusive and multi-cultural society in County Clare.

	f) To support and facilitate the development of new indoor and outdoor spaces in County Clare that can enable formal and informal community engagement.

Submission No: S2/999 –Department of Environment, Climate and Communications	
Relevant Chapters / Topics	• **Climate Action** • **Renewable Energy**

Summary of Issues Raised in Submission

This submission outlines the following:

Climate Action

- Welcomes how the Draft sets out the objectives in Table 2.1.
- The reference to the Climate Action Plan 2021 is also welcome but additional references to specific actions and targets could be further incorporated across the Draft to ensure greater consistency.

Renewable Energy – Wind/Solar

- The strategy would benefit from a review to ensure consistency with the revised targets set out in Climate Action Plan 2021 for up to 80% renewable energy.
- Additional references to the spatial planning measures would also be welcome.
- Clarity around how 550MW onshore wind capacity target will be met and whether adequate land is allocated to achieve same.
- While the strong progress of 153MW installed onshore wind capacity is noted, progress against the previous target should be clearly outlined and any shortfall should be factored into the new target.
- An analysis of the reason why the previous target was not reached would also aid in establishing measures to ensure the new target is achieved.
- It is important that the capacity to deliver onshore wind isn't reduced further during the finalisation of the Plan.
- Clarity as to how the Strategy and the Wind Energy Strategy incorporates the requirements of the "Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change" (DHLGH, 2017) would also be beneficial. Any further Material Amendments to the Draft Plan should also demonstrate compliance with these Guidelines where relevant.
- The Strategy sets out an overall solar target of 300MW out of a resource of 11GW and would welcome further technical information on the methodology used to arrive at this figure and whether there is capacity to revise this upwards.
- Detail on the sieve analysis for calculation of onshore wind energy target would also be welcomed.
- Clear support for Ireland's offshore wind ambitions is noted and the Draft's policy framework in respect of land-side infrastructure for offshore wind is commended.

District Heating Policy

- Welcomes the focus on district heating and would draw attention to the National Comprehensive Assessment which may further inform its analysis.
- To engage directly with the Department as it is important that any policies related to district heating can accommodate any future or emerging policy framework.

Waste Policy & Resource Efficiency

- Recommends consultation with its Regional Waste Management Planning Office.

Observations from Geological Survey Ireland

Geoheritage

- Welcomes that the 45 County Geological Sites (CGSs) is listed in Appendix 3 'Natural Heritage Sites and welcome the inclusion of these sites as a specific objective CDP15.6.
- In draft SEA Report, Section 5.8.8 Issues and Threats in the Plan Areas we commend the recognition of vulnerable CGSs sites.
- Listing in the Plan provides protection of the sites against potentially damaging developments.

Culture and Tourism

- Welcomes the inclusion of geotourism as part of objective CDP15.6b.
- Notes the reference to the Burren and Cliffs of Moher UNESCO Global Geopark and welcomes its inclusion as part of objective CDP9.24c.
- Objective CDP9.24 to support interpretive signage would ask to consider the use of information panels on the design of future signage to highlight an area of geological interest in vicinity of walking routes/trails.
- Note objective CDP9.9 Educational Tourism and happy to provide support to Clare on this.

Groundwater

- Welcome the mention of Groundwater Protection Scheme in Chapter 11 and inclusion in development plan objectives.
- Recommend the ongoing use of Geological Survey Ireland's Groundwater maps and datasets.
- Pleased to see use of their Groundwater data sets in draft SEA Report and that use of their data or maps is attributed correctly to Geological Survey Ireland.

Geohazards

- Note the use of their online mapping data sets for Landslide Events and Susceptibility in draft SEA Report.
- Welcome mention of the GWFlood Project and to see their Figure 5.8.8 map included.
- Welcome the use of their datasets in Coastal Vulnerability in Section 5.8.6.

Geothermal Energy

- Would like to highlight two new publications, the Assessment of Geothermal Resources for District Heating in Ireland and the Roadmap for a Policy and Regulatory Framework for Geothermal Energy in Ireland.
- This data would be of benefit to objective CDP2.17 Renewable Heat and in Volume 5 Renewable Energy Strategy and Chapter 12 Renewable Heat.

Natural Resources

- Welcome the inclusion in Chapter 8 of objective CDP8.14 and request an amendment to include the development for aggregates/mineral extraction does not have a significant negative impact on County Geological sites and/or sites of geological importance.
- Request assistance with our geological heritage goals with the following:
  1. Allowing access to quarry faces by appropriate scientists (upon request and with due regards to Health and Safety requirements) during quarrying to check for interesting new

stratigraphies / relationships as they might become exposed and to establish if the quarry site is worthy of recognition post extraction and through aftercare/restoration planning.

2. If deemed appropriate in (1) above, leaving a representative section of the quarry face at the end of the quarry life or inclusion of information panels to promote the geology to the public or develop tourism or educational resources if appropriate depending on the future use of the site. Natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface.

- The 'Geological Heritage Guidelines for the Extractive Industry', acts as a comprehensive guide in the sustainable extraction of natural resources while preserving the geological heritage of Ireland.

<u>Geochemistry of soils, surface waters and sediments</u>

- Provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality.

<u>Marine and Coastal Unit</u>

- Welcome use of the Marine and Coastal Unit datasets in 'Coastal Vulnerability' in Section 5.8.6 'Geohazards' of the draft SEA Report.
- Recommend the continued use of our Marine and Coastal Unit datasets available on our website and Map Viewer. These datasets will be of benefit to the CDP policy aims and objectives contained in Chapter 2 'Climate Action', Chapter 9 'Tourism', Chapter 12 'Shannon Estuary' and Chapter 13 'Marine and Coastal Zone Management' and in the SEA Report.
- In Volume 5 Clare Renewable Energy Strategy, Chapter 9 'Marine Renewables', we would recommend use of our Marine and Coastal Unit datasets which would also be of benefit to the 'Objectives and Targets' in this chapter.

<u>Physiographic Units</u>

- Recommend you use our physiographic units map data in relation to Section 14.2.1 'Landscape Character Assessment of County Clare' in Chapter 14 'Landscape' of the draft CDP and Section 5.13 'Landscape' of the draft SEA Report.
- Physiographic Units are cartographic representations of the broad-scale physical landscape of a region.
- Physiographic Units map data can be viewed online under the Physiographic Units tab on the online Map Viewer.

Chief Executive's Response

I thank the Department of Environment, Climate & Communications for the submission which includes observations from the Geological Survey Ireland, to which I respond below.

<u>Renewable energy – wind and solar</u>

I note the comments from the Department of Environment, Climate & Communications (DECC) correctly outline that the renewable energy target has been revised up to 80% under CAP21. Regarding the revised targets set out in Climate Action Plan 2021 for up to 80% renewable energy, a review and update to the draft RES will reflect the revised CAP21 targets alongside identifying

any significant changes to legislation which have an impact on the strategy.

In relation to onshore wind energy, the Wind Energy Strategy (WES) is not being reviewed and a new strategy prepared until such time as the government Wind Energy Guidelines are finalised. A review of targets for onshore wind will therefore be part of the process of the new WES preparation process. Furthermore, the analysis carried out for the Draft Renewable Energy Strategy follows the SEAI LARES methodology, which presents a sieve analysis strategy which starts with the maximum resource possible and concludes with the presently accessible/competitive resource, and as a result is concerned with high-level mapping at County level.

I note that as per Appendix 7 of the Draft CDP, the draft plan has been prepared in accordance with the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (DHLGH, 2017).

As regards solar energy, the Draft RES identifies an unconstrained potential solar resource of 11GW in County Clare. The Draft Renewable Energy Strategy (RES) identified 300MW as an ambitious but achievable working target for 2030, bearing in mind the scale, geography and land-use of the county. This local target was established in the context of a national target to achieve 2.5GW of solar energy capacity by 2030. Competitiveness of solar farms increases for larger installations. The local geography of Clare may mean it will not be a leading county for solar installation, whilst other parts of Ireland may have more sunlight and larger land holding capacity which may lend itself to being a more suitable location for larger capacity of solar energy generation. It is noted that the targets established in the RES are not to be considered a ceiling, and there is scope to revise this target upwards, however consideration should be given to the low base where solar development is coming from, the competitive process for gaining financial support, and the availability of grid capacity at local level.

As per CAP 21, it is the objective of the government to develop a policy and regulatory framework for geothermal energy to support its use as a secure, environmentally sustainable and cost-effective source of renewable energy. This process is underway with the Department of the Environment, Climate and Communications recently closing the consultation on a Draft Policy Statement on Geothermal Energy for a Circular Economy alongside an associated SEA and AA reports.

I note the Regional Waste Management Planning Office have engaged in the plan preparation process to date and includes a submission (Ref. S2/889) on the Draft Plan which is also subject of this Report.

In response to the observations of the Geographical Survey of Ireland I note the extensive amount of information and mapping which is a very valuable resource to the planning department in terms of both plan-making, SEA, Renewable Energy Strategy, and development management.

I note the request for an inclusion in Objective CDP9.24 Tourism in North Clare and the Burren to consider the use of information panels on the design of future signage to highlight an area of geological interest in vicinity of walking routes/trails. I consider it appropriate to include an addition to this objective in part f)"To support and promote, with the co-operation of private landowners, public access and interpretive signage at heritage sites and areas of geological interest where appropriate".

I note and welcome the two new publications, the Assessment of Geothermal Resources for District Heating in Ireland and the Roadmap for a Policy and Regulatory Framework for Geothermal Energy in Ireland, and agree that these are a valuable additional resource in particular

to our relevant objectives in the Draft Pan and the Draft RES in relation to renewable heat.

It is recognised that aggregates/mineral extraction should not negatively impact on County Geological sites and/or sites of geological importance and I consider it appropriate to include additional wording in CDP 8.14 Minerals, Mining and Quarry to include the additional text "County Geological Sites / Sites of geological interest.

I note the Physiographic Units map data which is available and can be viewed online under the Physiographic Units tab on the online Map Viewer. This will be another very valuable resource in terms of the Landscape and reference to this will be incorporated into Volume 10 SEA Environmental Report, part 5.13.13 (e).

Chief Executive's Recommendation

I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029.

- Insert text in Objective CDP9.24 Tourism in North Clare and The Burren to read as follows:

f)"To support and promote, with the co-operation of private landowners, public access and interpretive signage at heritage sites and areas of geological interest where appropriate"

- Insert text in Objective CDP8.14 Minerals, Mining and Quarrying to read as follows:

"To promote the extraction of minerals and aggregates and their associated processes where such activities do not have a significant negative impact on the environment, landscape, public health, archaeology, County Geological sites and/or sites of geological importance or residential amenities of the receiving environment and where such operations are in compliance with all national regulations and guidelines applicable to quarrying and mining activities".

- Insert additional text in Volume 10 (SEA Environmental Report) Section 5.13.3 (e) Physiographic Units as follows:

Physiographic Units

The Geological Survey of Ireland have published Physiographic Units which are cartographic representations of the broad-scale physical landscape of a region. They delineate physical regions showing internal uniformity with respect to one or more environmental attributes that can be clearly differentiated from neighbouring regions. They are valuable for regional land-use planning, and in studies of the influence of physical landscape on the ecological environment. The Physiographic Units as depicted in Figure 14.1 were produced in support of the actions to be implemented in the National Landscape Strategy for Ireland 2015 – 2025. These units will be taken into consideration in land-use planning for the County.

The Level 1 classification scheme dataset divides the landscape in six broad landform regions differentiating bedrock dominated landscapes at different altitude as mountains (> 300 m) hills (100 to 300 m) and plains (< 100 m) and sediment landscapes with differing degrees of change in slope as rolling, hummocky and flat.

Level 2 classification scheme differentiates between fifteen landform systems comprising, seven bedrock dominated landscape with differing texture or rugosity, which is strongly associated with the underlying bedrock type (e.g. granite bedrock evolves into rounded mountain or hill landscapes, quartzite ....) and eight sediment landscapes with differing landform signatures, which are indicative of the geological process shaping them.

Level 3 classification scheme comprises twenty-eight land units. Bedrock landscapes are divided in fourteen categories indicating altitude, rugosity and bedrock type, and evidence of glacial abrasion; sediment landscapes are divided in further fourteen categories indicating dominant landform, depositional process and climatic influence (e.g. raised bog and blanket bog).

Submission No: S2/1000 –National Monuments Service (World Heritage Unit)	
Relevant Chapters / Topics	• **World Heritage**

Summary of Issues Raised in Submission

This submission relates to World Heritage.

- It is important to distinguish between world heritage tentative list **site** and a world heritage **property**.
- A world heritage tentative list **site** is a proposed site that may have potential outstanding universal value.
- A world heritage **property** is an actual property inscribed on the world heritage list.
- Suggests that the Draft reflects the possibility that Tentative List **sites** may become world heritage **properties**.
- Suggests changes to the text in relation to Section 15.2.21 UNESCO World Heritage and development objectives CDP15.26 and CDP 15.27.

Chief Executive's Response

I thank the National Monuments Service for its submission in relation to World Heritage.

I note the clarity provided in the submission in relation to the distinction between a World Heritage Tentative List site, which is a proposed site that may (or may not) have potential Outstanding Universal Value, and a World Heritage Tentative Property which is actually inscribed on the World Heritage List. The ultimate goal is inscription and the Tentative List is only one step in the journey.

I note the Draft Plan includes objectives in Volume 1, Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure, in particular objectives CDP15.26 World Heritage site Status and CDP15.27 Development Proposals in Designated World Heritage Sites and suggested amendments to the wording of these objectives are included in the submission which upon review I consider appropriate.

Chief Executive's Recommendation

I recommend amendments to the Draft Clare County Development Plan 2023-2029 on the basis of this submission as follows:

To amend the wording of the following objectives in Volume 1, Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure.

15.2.21 UNESCO World Heritage ~~Site~~

The protection of the world's cultural and natural heritage is of high importance for present and future generations and, to this end, the State is committed to the identification, management, protection, conservation, presentation and transmission of its World Heritage ~~Sites (tentative list) to future generations~~ Properties in accordance with Article 4 of the World Heritage Convention. ~~A Tentative List is an inventory of those properties which a country intends to consider for nomination to the World Heritage List.~~ A World Heritage Tentative List site is a proposed site that may (or may not) have potential Outstanding Universal Value, and a World Heritage Tentative Property is actually inscribed on the World Heritage List. The ultimate goal is inscription and the Tentative List is only one step in the journey.

CDP 15.26 World Heritage ~~Site~~ Status

It is an objective of Clare County Council:

a) To collaborate with landowners, local communities and other relevant stakeholders to identify sites of global significance in County Clare that may be added to Ireland's ~~achieve~~ World Heritage Tentative List, and in due course achieve full World Heritage status by being inscribed onto the world Heritage ~~List* Site status for identified sites in County C~~lare; and

b) To protect the attributes that convey the potential Outstanding Universal Value of sites that are included on Ireland's Tentative List ~~the tentative World Heritage Sites~~ in County Clare; ~~that are included in the UNESCO Tentative List and engage with other national and international initiatives which promote the special built, natural and cultural heritage of places~~ in the County.

c) To protect the attributes that convey the Outstanding Universal Value of World Heritage Properties inscribed on the World Heritage List

d) To engage with other national and international initiatives which promote the special built, natural and cultural heritage of places in the County.

In the event that ~~it is determined that any~~ sites in County Clare ~~that area successful in achieving status on the tentative~~ are included on Ireland's Tentative List of inscribed on the Word Heritage List, ~~Site list has Outstanding Universal Value~~ the following objective will apply when assessing proposals for development within the proposed and designated World Heritage areas/landscapes.

CDP 15.27 Development Proposals in Designated World Heritage ~~Sites~~ Properties

It is an objective of Clare County Council:

a) To ensure that proposals for development in Tentative List ~~designated World Heritage~~ Sites and their proposed buffer will be assessed having regard to the contribution of the

development to the preservation, conservation, management and enhancement of the special qualities of these areas and their ~~the potential~~ impact on the potential Outstanding Universal Value of the designated site.

b) To ensure that proposals for development in World Heritage Properties and their buffer zones will be assessed having regard to the contribution of the development to the preservation, conservation, management, and enhancement of the special qualities of these areas and their impact on the Outstanding Universal Value of the designated property

*The Tentative List is an inventory of those sites which a country considers having potential Outstanding Universal Value and intends to nominate for inscription onto the World Heritage List.

Submission No: S2/1001 –Failte Ireland	
Relevant Chapters / Topics	• **Tourism** • **Land Use** • **Shannon Estuary**

Summary of Issues Raised in Submission

This submission relates to Tourism in County Clare and welcomes key aspects of the Draft Plan including reference to Fáilte Ireland, Wild Atlantic Way, Ireland's Hidden Heartlands and Fáilte Ireland's Visitor Experience Development Plan. The following comments and suggestions are made:

Regional Tourism Plans (RTPs)

Refers to Fáilte Ireland *Regional Tourism Plans*, including Wild Atlantic Way Regional Tourism Strategy, to 2025 currently underway which will include Destination and Experience Development Plans. Once finalized the Wild Atlantic Way Regional Tourism Strategy is finalized it will become a primary reference document to inform Fáilte Irelands submissions on County and City Development Plans. It is therefore requested that an objective is included in the County Development Plan supporting the implementation of Wild Atlantic Way Tourism Plans, to support the continued collaboration with tourism stakeholders and to ensure successful implementation and delivery of these tourism plans.

Burren & Cliffs of Moher Visitor Experience Development Plan (VEDP)

Welcomes the reference to the VEDP in Section 9.2.5, as well as identification of the Burren in Section 9.3.4 and requests an objective acknowledging and supporting the VEDP and an objective supporting continued collaboration with tourism stakeholders to ensure its implementation and delivery as well as specific objectives relating to:

- Traffic & Transport - this is a critical challenge to the success of the Burren and is not called out enough in the plan. The Burren by its nature is restricted with the road network and adapting it, but it is considered that the Plan could support the identification and implementation of measures to improve this constraint.
- Burren Discovery Trail - is key to visitor dispersal and dwell time and important to highlight throughout the plan.

Ardnacrusha Power Station

Notes reference to Ardnacrusha in respect of its role as an infrastructure installation and that ESB are undertaking a feasibility study with regards the potential for a new visitor experience.

Destination Towns

Refers to Fáilte Ireland *Development Guidelines for Tourism Destination Towns* to provide a framework to support communities and local authorities and notes that Ennistymon has been granted investment under Fáilte Ireland's Designation Towns Funding Programme and should be referenced in Chapters 17 and 18.

Additional Suggested Text Insertions – Chapter 9 Tourism

1. Request the inclusion of a specific objective in CDP9.6 supporting the implementation of the objectives of the Burren and Cliffs of Moher Visitor Experience Development Plan.
2. Section 9.2.7 Ireland's Hidden Heartlands request a minor amendment to include the following text in Objective CDP 9.6:

   "To work with Fáilte Ireland and other key stakeholders to ensure the successful implementation and delivery of Lough Derg Visitor Experience Development Plan 2020-2024"
3. The Fáilte Ireland 'Platforms for Growth' identifies the development of facilities centres for water-based activities including ones located at Ballycuggeran Sports Activity Facility, Ogonnelloe, Killaloe as well as facilities along Lough Derg and the River Shannon. Considers these should be identified in Section 9.2.14 Lakeland and Waterway Tourism and suggests additional text in Objective 9.13 as follows:

   "b) To encourage the development of shared facilities centres, at inland water bodies including Ballycuggeran Sports Activity Facility, Ogonnelloe, Killaloe, Lough Derg and the River Shannon, to facilitate greater access to water for areas such as water sports and waterbased activities and events subject to normal planning and environmental criteria."
4. Section 9.2.18 Sustainable & Responsible Tourism is welcomed, and requests more explicit reference is made to sustainable transport including:
   - e-charging,
   - specific parking allocations for electric vehicles,
   - access restricted in certain areas to sustainable modes of transport,
   - reduced parking charges at publicly owned sites for low carbon,
   - carbon neutral transport modes,
   - provision of better and safer cycle lanes along many of the transit routes and access routes particularly between tourism towns, villages and attractions.
5. Section 9.3.3 Tourism in East Clare, considers East Clare is lesser known and lack of tourism accommodation a limited variety and supply of restaurants/cafes and a lack of accessibility by public transport. Potential new development/investment in tourism, in the area should be fully facilitated and supported by the Council, therefore requests additional objectives in Objective CP9.23:

   "k) to encourage the development of additional visitor accommodation and food and beverage offering in East Clare.

   l) identify potential upgrades or new public transport routes and greenways to encourage sustainable tourism options for visitors to East Clare."
6. The Burren Discovery Trail is an important assess which should be referenced with an objective supporting it in Section 9.3.4 Tourism in North Clare and the Burren.
7. Notes that Fáilte Ireland are currently preparing the Cliff Coast Destination Experience Development Plan (DEDP) and lists the objectives of the plan including addressing challenges, developing the international profile of the destination, developing authentic

community experiences, water adventure clusters, cliff and coastal trails, evening economy. Requests the following objective is requested as part of Objective CDP9.25:

"m) to work with Fáilte Ireland in the preparation and implementation of the Cliff Coast Destination Experience Development Plan"

Chapter 12 Shannon Estuary

Request the following text amendment in Section 12.2.2.1 Inishmurry/Cahiracon:

With its location on the Shannon Estuary Way which is a route off the world-famous Wild Atlantic Way – the longest defined and among the most stunning coastal routes in the world – with natural deep and sheltered waters, County Clare and the Shannon Estuary is a welcoming and attractive destination for cruise liners and their passengers. The Shannon Estuary is bounded by three of Ireland's most scenic and historic counties, Clare, Kerry and Limerick, each of which has significant tourism offerings.

Chief Executive's Response

I would like to thank Failte Ireland for the submission which relates to following:

Regional Tourism Plans (RTPs)

I note the points made in the submission and I consider it is appropriate to include an objective to support the implementation of the Wild Atlantic Way Tourism Plans.

Burren & Cliffs of Moher Visitor Experience Development Plan (VEDP)

I note the points made in the submission and I consider it is appropriate to include an objective to support the implementation of the Burren & Cliffs of Moher Visitor Experience Development Plan (VEDP).

I note the points made in the submission in relation to traffic and transport constraints in the Burren area. In this regard, I am satisfied that the Draft Plan contains general policies and objectives to address such constraints, in particular Section 11.2 Access and Movement in Chapter 11 as well as specific objectives Objective CDP9.24(h) to work with key stakeholders such as the National Parks and Wildlife Service to promote tourism initiatives within the Burren including the park and ride service operating from Corofin. In relation to the Burren Discovery Trail, I consider reference to it should be included in the Plan.

Ardnacrusha Power Station

I note the points made in relation to the potential for increased visitors at Ardnacrusha and I consider it is appropriate to reference this in the Plan.

Destination Towns

I note the points made in relation to the Fáilte Ireland *Development Guidelines for Tourism Destination Towns* and Designation Towns Funding Programme and I agree reference should be included in the Plan.

Additional Suggested Text Insertions – Chapter 9 Tourism

1. Please refer to my response under 'Burren & Cliffs of Moher Visitor Experience Development Plan (VEDP)' above.
2. I note the points made in the submission and I consider it is appropriate to include an objective in Objective CDP 9.6 as requested.
3. I note the points made in the submission and I consider it is appropriate to include an objective in Objective CDP9.13 as requested.
4. I note the welcome for Section 9.2.18 Sustainable and Responsible Tourism and I consider the request to outline specific measures of sustainable transport is acceptable.
5. I note the points made in the submission in relation to the need to support new development/investment in East Clare and I consider it is appropriate to include objectives in Objective CP9.23 as requested.
6. Please refer to my response under 'Burren & Cliffs of Moher Visitor Experience Development Plan (VEDP)' above.
7. I note the points made in the submission in relation to the Cliff Coast Destination Experience Development Plan and I consider it is appropriate to include an objective in Objective CDP9.25 as requested.

Chapter 12 Shannon Estuary

I consider it is appropriate to amend the text amendment in Section 12.2.2.1 Inishmurry/Cahiracon as requested.

Chief Executive's Recommendation

I recommend that the following amendments are made to the Draft Clare County Development Plan 2023-2029:

Objective CDP9.6 in Chapter 9, Volume 1 - include new point to read:

h) To work with Failte Ireland and other tourism stakeholders to support the successful implementation and delivery of Wild Atlantic Way Tourism Plans.

Objective CDP9.24 in Chapter 9, Volume 1 - include new point to read:

j) To work with Failte Ireland and other tourism stakeholders to support the successful implementation and delivery of the Burren & Cliffs of Moher Visitor Experience Development Plan (VEDP).

Section 9.3.4 Tourism in North Clare and the Burren, Chapter 9, Volume 1 – amend the second paragraph to read:

9.3.4 Tourism in North Clare and the Burren

Whilst tourism is well established in the area the potential exists to encourage a larger proportion of tourism traffic to stop in the North Clare area for longer periods of time to avail of the numerous rural and town-based visitor attractions. Key to this is the newly launched Burren Discovery Trail, identified as a catalyst project in Failte Ireland's Burren & Cliffs of Moher Visitor Experience

Development Plan, it was developed by Clare and Galway County Councils in partnership with Fáilte Ireland. The trail is a 95km a new looped route off the Wild Atlantic Way designed to encourage visitors to explore more and stay longer in the Burren, taking visitors through the Burren Highlands in County Clare and Lowlands in County Galway offering opportunities to engage with the stories of each local area and explore the many wonderful towns and villages in the region. Clare County Council will work with stakeholders and community groups to gain greater benefit from the further sustainable development of this driving route. The Burren Eco Tourism Network has won a Lonely Planet award in its 'Best in Travel' picks for 2021 and the Cliffs of Moher is a multiple times winner of the CIE Award of Excellence which further boosts the reputation of North Clare as a tourist destination. Future development at the Cliffs of Moher will be informed by the *Cliffs of Moher Strategy 2040*.

Under Employment and Enterprise in the Ardnacrusha Settlement Plan, Volume 3(b) – amend text to read:

Employment and Enterprise

The proximity of Ardnacrusha to Shannon and Limerick provides the settlement with a significant advantage with a wide range of employment opportunities within short commuting distance. In addition, having regard to the existing tours which take place at the Ardnacrusha Power Station, there may be potential to expand facilities and increase visitor numbers visiting the Station.

Under Place Making and Regeneration in Ennistymon in the Ennistymon Settlement Plan, Volume 3(d) – amend the second last paragraph to read:

Clare County Council, together with its partners, Clare Local Development Company (CLDC) and Ennistymon Town Team, has appointed a multi-disciplinary team to complete a masterplan for Ennistymon. The masterplan seeks to build upon existing Clare County Council proposals in place associated with the planned new bridge crossing and the upgrading works along the Main Street. The study will explore the potential of the existing townscape and its built environment in order to guide its development in a positive way. It will also comprise a new signage strategy and streetscape enhancement plan, which seeks to improve both the visitor and resident experience. In addition, Ennistymon has been granted funding under Fáilte Ireland's Destination Towns Funding Programme with significant public realm delivered including the provision of natural limestone and granite paving, a new pedestrian crossing, street furniture, improved signage, and the replacement of existing timber and steel electricity and public lighting poles with new decorative lighting. This project aims to increase visitor dwell time in Ennistymon and further enhance the overall appearance of the town. Fáilte Ireland's Destination Towns scheme is funded under the Government's Project Ireland 2040 strategy with the aim of driving sustainable growth in the Irish tourism sector and higher revenue and job creation around Ireland.

Section 17.2.3 Town and Village Improvement Strategies, Chapter 17 of Volume 1 - amend the last paragraph to read:

Shannon Town Centre Masterplan is being prepared and part funded through the URDF. Ennistymon has also been granted funding under Fáilte Ireland's Destination Towns Funding Programme with significant public realm works delivered. In addition, Fáilte Ireland's 'Development Guidelines for Tourism Destination Towns' publication provides a framework to support communities and Local Authorities and sets out the key drivers of what makes a town appealing to the international visitor. Other actions undertaken to date to revitalise existing centres include the preparation of 'Towards a Better Kilkee – A Town Improvement and Economic

Development Strategy 2014- 2024', feasibility studies for Cappa, Corofin and Ennistymon and the inclusion of co-working digital hub facilities in Ennis, Corofin, Ennistymon, Feakle, Kilrush, Kilkee, Miltown Malbay, Cross and Caran.

Objective CDP9.6 in Section 9.2.7 Ireland's Hidden Heartlands, Chapter 9 of Volume 1 - include new point to read:

h) To work with Fáilte Ireland and other key stakeholders to ensure the successful implementation and delivery of Lough Derg Visitor Experience Development Plan 2020-2024.

Objective CDP9.13, Section 9.2.14 Lakeland and Waterway Tourism, Chapter 9 of Volume 1 - include new point to read:

b) To encourage the development of shared facilities centres, at inland water bodies including Ballycuggeran Sports Activity Facility, Ogonnelloe, Killaloe, Lough Derg and the River Shannon, to facilitate greater access to water for areas such as water sports and waterbased activities and events subject to normal planning and environmental criteria.

Section 9.2.18 Sustainable and Responsible Tourism, Chapter 9 of Volume 1 – amend text to read:

9.2.18 Sustainable and Responsible Tourism

The NPF and RSES for the Southern Region recognise that in order to develop a sustainable tourism industry in Ireland, infrastructural investment is required to enhance amenities including the built, cultural and natural heritage assets in both urban and rural areas. Investment in developing a well-designed public realm in settlements, recreational infrastructure and rural amenities including activity-based tourism and trails, such as greenways and blueways will significantly contribute to the sustainable growth of the tourism sector. County Clare is well positioned to progress sustainable and responsible tourism initiatives. Sustainable transport initiatives could include e-charging, specific parking allocations for electric vehicles, restricted access in certain areas to sustainable modes of transport, reduced parking charges at publicly owned sites for low carbon, carbon neutral transport modes, provision of better and safer cycle lanes along many of the transit routes and access routes particularly between tourism towns, villages and attractions. Private tourism operators and groups such as the Burren Eco-Tourism Network are already doing significant work to progress these aspects of tourism development. In accordance with the requirements of the RSES for the Southern Region specific monitoring protocols for visitor pressure are required to ensure that tourism activities are maintained within sustainable limits.

Objective CDP9.23 in Section 9.3.3 Tourism in East Clare, Chapter 9 of Volume 1 - include new point to read:

k) To encourage the development of additional visitor accommodation and food and beverage offering in East Clare.

l) To support the identification of potential upgrades or new public transport routes and greenways to encourage sustainable tourism options for visitors to East Clare.

Objective CDP9.25 in 9.3.5 Tourism in West Clare, Chapter 9 of Volume 1 - include new point to read:

m) To work with Fáilte Ireland in the preparation and implementation of the Cliff Coast Destination Experience Development Plan.

Section 12.2.2.1 Inishmurry/Cahiracon in Chapter 12 of Volume 1 – amend text to read:

With its location on the Shannon Estuary Way which is a route off the world-famous Wild Atlantic Way – the longest defined and among the most stunning coastal routes in the world – with natural deep and sheltered waters, County Clare and the Shannon Estuary is a welcoming and attractive destination for cruise liners and their passengers. The Shannon Estuary is bounded by three of Ireland's most scenic and historic counties, Clare, Kerry and Limerick, each of which has significant tourism offerings.

Submission No: S2/1002 –Iarnród Eireann	
Relevant Chapters / Topics	• **Transport (Access & Movement)**

Summary of Issues Raised in Submission

The submission provides guidance on the "importance of long-term planning and vision in the Development Plan" in the context of a move towards a more sustainable integrated transport system, advanced local mobility hubs, maximisation of dynamic impacts between housing and transport and ultimately achieving net-zero emissions by 2050.

Investment in Rail aligns with National Strategic Policy (as set out in NPF and Project Ireland 2040) including:

- NSO 1: Compact Growth
- NSO 2: Enhanced Regional Accessibility
- NSO 4: Sustainable Mobility
- NSO 8: Transition to a Low Carbon and Climate Resilient Society

Investment in Rail also aligns with the RSES.

Iarnród Éireann is planning for a major expansion of the railway as set out in the 'Iarnród Éireann Strategy 2027' document.

In this submission:

- Iarnród Éireann envisages possible enhanced and expanded rail network for the Limerick-Shannon area could be completed by 2030, with minimum disruption during construction, as the land required to construct it is in railway ownership;

- Iarnród Éireann states it can facilitate the following key deliverables:
  - The creation of a vital new rail link to Shannon Airport and the Shannon Free Zone international business park
  - The creation of a high-quality suburban rail system over new, existing, and currently disused lines, with a redeveloped Colbert Station Integrated Transport Hub at its centre.
  - Facilitating greatly enhanced Intercity connections to Dublin, Galway, and other key regional cities.
  - Re-opening of the Foynes Line for rail freight to Shannon-Foynes Port.

- Iarnród Éireann states that a draft report on flood relief options at Ballycar has been prepared and issued to the project stakeholders. It recommends a new preferred option. A solution in terms of funding for this preferred solution is essential to allow timely delivery of the scheme and should be prioritised by the Council.

- Iarnród Éireann recommends that the final Development Plan should continue to support a requirement to undertake an immediate feasibility study to map timelines and phasing of the rail possibilities in their submission, including potentially a cost profile during the first year of the Plan.

Policy Support

Iarnród Éireann welcomes Policy Objective CDP11.6, as regards its intention "to support and facilitate the maintenance, improvement and strengthening of rail infrastructure and services and the provision of multi-modal transport interconnection facilities….".

LSMATS

The major strategic focus for Iarnród Éireann of relevance to the new Development Plan is on the development of an enhanced suburban services, introduction of a new Shannon Rail Link, as well as improved rail links to other regions, including to the Capital Dublin and Galway City. While the Draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) provides proposed transport objectives for the Shannon Area for the period 2020-2040, the submission states that opportunities exist to be included and expanded upon in LSMATS, with the following comments:

- Heavy Rail Improvements such as electrification and new stations, resolution of Ballycar flooding, dual-tracking from Limerick Colbert to Limerick Junction are included in LSMATS but are in the latter period of the Strategy Implementation. Iarnród Éireann see an opportunity to deliver these measures in the short-term, particularly electrification and new stations;
- Iarnród Éireann welcomes Policy Objective CDP 11.3, as regards its intention to implement LSMATS;

Shannon Rail Link

The Rail Link to Shannon Airport is supported in the RSES. Iarnród Éireann envisages this rail connection being delivered in the medium-long term, with the existing line to diverge at a proposed Cratloe Interchange. The new rail link to Shannon would not hinder existing services to Ennis;

Iarnród Éireann believe that for the Shannon Area, including Shannon Town, Shannon International Airport, and the Shannon Free Zone to maintain its growth, mobility and competitiveness, a re-appraisal of a rail link to Shannon Airport should be an objective in the Development Plan in the short-term, with a medium to longer-term objective for its implementation. Therefore Iarnród Éireann welcomes Policy Objective CDP 11.7 that a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard from Hurlers Cross to Shannon Airport, taking account of the proposed N19 National Road upgrade, and that the Rail Link will be facilitated while not inhibiting the N19 National Road upgrade.

Regarding the Limerick Shannon Ennis North-South Suburban Rail Service – "Shannon Rail Link alignment is not exact and is for demonstration only".

Regarding the Enhancements to the Existing Suburban and Inter-City network: There is potential for hourly trains between Limerick Colbert and Ennis, with a half-hourly service in the AM peak. There is also potential for the increase of Limerick – Galway services and the reduction of journey times on that route. It is requested that the final Development Plan supports this and also supports enhanced Regional and Inter-City interchange opportunities at Limerick Colbert for Ennis suburban rail services.

Ballycar Flooding

Resolving the flooding issue should be a short-term objective of the CDP to progress.

Electrification
Seeks that the Development Plan support the short-term implementation of the electrification of existing Ennis – Limerick services and medium-term electrification of Ennis - Galway services.

Rail Freight
Seeks that the plan considers Iarnród Éireann's 'Rail Freight 2040' document. Welcomes the draft CDP's Objective CDP 11.24 'Freight' in this regard.

Accessibility Programmes
Seeks that the CDP supports the further expansion of this programme.

Customer Information Services
Seeks that the CDP supports the development of Customer Information Services.

Development of Multi-Modal Interchange Strategy
Seeks that measures are included that ease interchange with other modes, prioritising those that are sustainable – cycling, electric vehicles, wayfinding for pedestrians etc., because such measures would facilitate compact growth. Council to consider supporting the implementation of a Multi-Modal Interchange Strategy.

Level Crossings
Iarnród Éireann would welcome the support of the CCDP in eliminating Level Crossings.

Local Transport Plans
Iarnród Éireann welcomes Objective CDP 11.3 which commits to Local Transport Plans for Ennis and Shannon and requests to be consulted during the preparation of the LTPs.

New Stations
Highlights the policy objective CDP 11.6 which supports new stations on the Western Rail Corridor including at Crusheen. The submission asks the Council to note that there is no provision for a station at Crusheen under Iarnród Éireann's current funding profile. It also outlines the requirements of the Government's Public Spending Code as regards the funding of new projects.

All-Island Rail Review
Asks the Council to note that this review has commenced and that Iarnród Éireann will be prioritising the outcomes of this review.

Property Issues
Seeks that any measure or proposal by the Council that would affect Iarnród Éireann's properties would be discussed and agreed with the CIÉ Group's Property Division.

Protected Structures
Iarnród Éireann notes that there are no railway structures to be added to the Record of Protected Structures.

Chief Executive's Response

I wish to thank Iarnród Éireann for the submission and I would like to address the issues raised as follows:

Limerick-Shannon Metropolitan Area

The Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) is a cross-county Metropolitan scale document which sets out the policies and objectives of the National Transport Authority, Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland at a level appropriate to that scale. The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the Limerick Shannon Metropolitan Area (LSMA).

The Draft CDP, at Objective CDP11.3, sets out its intention to implement the draft LSMATS during the lifetime of this Development Plan. Having considered this submission and reviewed Objective CDP11.3 and the draft LSMATS document, it is acknowledged that LSMATS has an operable lifetime up to 2040 and that some of its measures will be implemented in the later parts of the Strategy's lifetime. This is evident in Chapter 19 'Implementation' of the draft LSMATS. The Draft CDP, once adopted, will have a lifetime up to 2029. I consider that CDP11.3 should be amended to correctly represent that the CDP will seek to implement LSMATS in accordance with the Implementation Plan for LSMATS.

As a result of being a party to the establishment and subsequent implementation of LSMATS, the Council cannot include in its development plan any policies that would seek to implement LSMATS measures ahead of the intended phasing for those measures in the Implementation Plan of LSMATS. Therefore the timeline for completion of an enhanced and expanded rail network for the Limerick-Shannon area by 2030 cannot be supported in the Development Plan. Similarly, the Council cannot include policy support for the timetable or frequency aspects of rail services operating within the County as this is a matter for implementation through public transport services planning which the Council does not have responsibility for.

I note the information provided by Iarnród Éireann regarding flood relief options at Ballycar and I consider that CDP11.6 (e signals the Council's intention to contribute to resolving the issue of periodic flooding along the railway.

Shannon Rail Link

The Council welcomes the information provided by Iarnród Éireann in relation to the potential Shannon Rail Link, and I note that the detail provided appears consistent with that shown in the LSMATS Limerick Commuter Rail Network (Phase 2 and that it has policy support in the NDP, NPF, RSES and LSMATS.

The Council welcomes the support of Iarnród Éireann for Policy Objective CDP11.7 - that a review of the existing feasibility study as it applies to the Shannon Rail Link infrastructural safeguard. Iarnród Éireann should note that from its assessment of other submissions, the Council will seek to amend this Objective slightly such that the review of the existing feasibility study applies to the full extent of the Shannon Rail Link infrastructural safeguard that is mapped in the Draft CDP (Volume 2 maps) and not just the section between Hurlers Cross and Shannon Airport. I do not consider that amendments to the objective are required on foot of the submission from Iarnród Éireann.

Development of Multi-Modal Interchange Strategy, etc.

The Council welcomes the information provided to it regarding electrification, Level Crossings, Rail Freight, Accessibility Programmes, Customer Information Services, and Multi-Modal Interchange. CDP11.6 (a) states "To support and facilitate the maintenance, improvement and strengthening of rail infrastructure and services and the provision of multi-modal transport interconnection facilities subject to appropriate environmental assessment and the outcome of the planning process". I consider that this objective provides adequate policy support for the topics raised in this part of the submission.

Local Transport Plans

Under revisions to Objective CDP11.3 Local Transport Plans will be prepared in accordance with the TII/NTA Area Based Transport Assessment (ABTA Guidance. Consequently, Iarnród Éireann, as a transport service provider, will be consulted in the preparation of these plans, where applicable.

New Stations

The submission asks the Council to note that there is no provision for a station at Crusheen under Iarnród Éireann's current funding profile. It also outlines the requirements of the Government's Public Spending Code as regards the funding of new projects. In response to a submission from the NTA, the Draft Plan Objective CDP11.6 (b) will be amended as follows: To support and facilitate the opening/reinstatement of railway stations on the Western Railway Corridor within County Clare and in particular at Crusheen, *in line with feasibility studies undertaken on the basis of forecast demand and according to the investment priorities of Irish Rail and the National Transport Authority* (additional text italicised).

All-Island Rail Review

The Council will note the outcomes of the All-Island Rail Review when available.

Property Issues

While Iarnród Éireann seeks that any measure or proposal by the Council that would affect Iarnród Éireann's properties would be discussed and agreed with the CIÉ Group's Property Division, I consider that this is best pursued through the Council's Development Management function and Transportation Section.

Protected Structures

The council confirms there are no railway structures to be added to the Record of Protected Structures.

Chief Executive's Recommendation

Amend Volume 1 Chapter 11 CDP Objective 11.3, as follows:

Development Plan Objective: Draft Limerick-Shannon Metropolitan Area Transport Strategy and Local Transport Planning

	CDP11.3	It is an objective of Clare County Council: a) To implement the measures contained within the Draft Limerick-Shannon Metropolitan Area Transport Strategy ~~during the lifetime of this Development Plan~~ in accordance with the Implementation Plan set out in the draft LSMATS document; b) To implement a Local Transport Plan for Ennis, Shannon, Sixmilebridge, Kilkee, Kilrush, Lahinch, Corofin and Tulla during the lifetime of this Development Plan; and c) To work in close co-operation with Technical University of the Shannon: Midlands Midwest and the Endurance European network.	

Submission No: S2/1008 –Cyril Feeney, Clare County Council (Water Services Department)

Relevant Chapters / Topics

- **Wastewater Infrastructure**

Summary of Issues Raised in Submission

This submission relates to developer provided or led wastewater infrastructure.

- Would have a concern as there is no provision by Irish Water in their investment plan for taking in charge such infrastructure.
- Irish Water has also made it clear in their Memorandum of Understanding that they will not take in charge this stand-alone infrastructure.
- The local authority has no power to take such infrastructure in charge or operate it.
- There is particular "exclusion provisions" that apply under the Water Services No 2 Act 2013.
- Local authorities have been left with abandoned estates, which previously would have been dealt with under Section 91 of Water Services Act 2007, but that function is now with Irish Water.
- Local authorities have also been refused the relevant discharge certificate of authorization for such infrastructures by the EPA.
- For those reasons would not recommend this type of infrastructure in an un-serviced towns/village to be adopted.

Chief Executive's Response

I wish to thank Cyril Feeney for the submission, made on behalf of Clare County Council and I would like to address the issues raised as follows:

The servicing of development through developer-provided wastewater infrastructure is acknowledged as being problematic based on the constraints that are described in the submission and also based on certain previous experiences with infrastructure of that type. In the absence of effective ongoing management, developer-provided wastewater infrastructure can be prone to cause significant negative impacts on the environment and can result in serious negative impacts on the occupants of residences both served by the plants and also those in proximity to the plants where there is potential for odor, sewage overflow, backing up of plants, malfunctioning of pumps, screens etc. I also have concerns that as the Council is no longer a Water Services Authority there will be very little scope for the Council to intervene to address issues that may arise as a result of these plants being installed. I am in complete agreement with the Senior Engineer Cyril Feeney on this point and having regard to his concerns expressed in this submission I recommend that the plan be amended to omit the supporting objective for the provision of developer-provided wastewater infrastructure.

Chief Executive's Recommendation

I recommend that the following amendments are made to Vol 1 Written Statement, Chapter 11, Section 11.4.3 Wastewater Management of the Draft Clare County Development Plan 2023-2029 on the basis of this submission.

Development Plan Objective: **Wastewater Treatment and Disposal**	
CDP11.32	It is an objective of Clare County Council: a) To support the implementation of Irish Water Investment Plans and to advocate the provision, by Irish Water, of adequate wastewater treatment facilities to accommodate the target population and employment potential of the County in accordance with the statutory obligations set out in the EU and national policy and in line with the Core Strategy and Settlement Hierarchy set out in this Plan; b) To support the role of Irish Water Investment Plans in taking into account seasonal pressures on critical wastewater treatment service infrastructure and climate change implications in the design of all relevant projects; c) To advocate for the on-going provision, conservation and upgrade of wastewater treatment infrastructure in the County; d) To maximise the use of the existing capacity of wastewater treatment services in the planning of new development; e) To protect existing way leaves and protection areas around public wastewater treatment services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required wastewater treatment services infrastructure; f) To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of the existing sewer networks and minimise detrimental impacts on sewage treatment works; g) To permit the development of single dwelling houses only where it is demonstrated to the satisfaction of the Planning Authority that the proposed wastewater treatment system is in accordance with the *Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses,* EPA (2021);

~~h) Where settlements have no public wastewater treatment infrastructure, to consider alternative developer led/provided shared use wastewater treatment infrastructure, including those incorporating nature-based solutions, to serve development where it can be clearly demonstrated that the system is in compliance with relevant EPA Guidelines on design standards and which will allow connection to a public system when it is provided. Any such consideration will be subject to the following criteria:~~

~~i. Connection to an existing public wastewater treatment system is not currently available.~~

~~ii. Environmental and planning requirements are satisfied including plan adequacy, site suitability and a suitable means of sludge and treated effluent disposal.~~

~~iii. The land on which the treatment plant is located is transferred to Irish Water on their request if/when a public system is provided.~~

~~iv. The management and maintenance of the shared wastewater treatment and disposal infrastructure following its completion shall be the responsibility of a legally constituted management company. This management company will be responsible for the adequate maintenance, operation and management of the shared infrastructure. It shall be a condition of sale of all elements of the permitted development that the purchaser become a shareholder in the management company and include a similar condition on any contract for subsequent disposal of the property.~~

~~v. Adherence to the environmental assessment criteria set out in section 11.4.3.1 of this plan.~~

i) To permit the development of treatment systems for small businesses/community facilities in unserviced areas where they are in single ownership and where it is demonstrated to the satisfaction of the Planning Authority that the proposed wastewater treatment system is in accordance with *Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses*, EPA (2021) and *Wastewater Treatment Manuals-Treatment Systems for Small Communities, Business, Leisure Centres and Hotels*, EPA (1999); and

i) To encourage and support a changeover from septic tanks/private wastewater treatment plants to public collection networks wherever feasible, subject to

	connection agreements with Irish Water and to ensure that any future development connects to the public wastewater infrastructure where it is available; ii) To ensure that any private wastewater treatment system proposed complies with the environmental requirements of Objectives CDP4.2, CDP4.5 and CDP3.1 of this plan.

~~**11.4.3.1 Environmental assessment criteria:**~~

~~It will be a requirement that it be demonstrated with scientific certainty that the construction, operation, maintenance, monitoring and decommissioning of any such developer led/provided shared use wastewater treatment infrastructure will not give rise to adverse effects on the site integrity of any European sites in view of their conservation objectives and having regard to the characteristics of the species or habitat, including their structure, function, conservation status and sensitivity to change. Where this cannot be demonstrated with certainty, then developer led/provided shared use wastewater treatment infrastructure shall not be permitted. Nature-based solutions such as constructed wetlands (CWs) and integrated constructed wetlands (ICWs) will not be considered for;~~

- ~~Settlements within areas of karst landscape~~
- ~~Areas deemed to be of high nature value or of high biodiversity value~~
- ~~Sites within 60m up-gradient of any well or spring used for potable water~~
- ~~Sites within the inner protection zone of a public groundwater supply source, where the vulnerability rating is classified as extreme~~
- ~~Sites within 300m up-gradient of a public supply (>10m3/day or >50 persons) borehole, where an inner protection zone has not been identified~~
- ~~Sites within 25m of a dwelling~~
- ~~Sites where construction of the ICW may negatively impact a site of cultural heritage value~~
- ~~Sites where adequate land area is not available~~
- ~~Sites near a watercourse (distances of not less than 10m from the initial and second ponds and no less than 5 m for subsequent ponds will be required)~~
- ~~Sites that cannot be adequately protected from flood damage. A site specific flood risk assessment will be required as part of any potential planning application for a Nature Based Solution.~~

~~In addition:~~

- ~~An early assessment of a site's overall suitability and the properties/nature of the influent are required to avoid siting such Nature Based Solutions in inappropriate settlements or areas within settlements.~~

- ~~The assessment must determine whether the ICW discharges, either via surface or ground, to any SAC, SPA or NHA.~~
- ~~In addition to the environmental function of an ICW, it is an essential requirement of the ICW concept to explicitly address the social, economic, and ecological considerations of the site, so that the needs of all stakeholders in the management of the land and water resources that are linked to a site need are given appropriate consideration. Regard must be had to all water quality discharges, achieving an appropriate landscape fit and enhancing biological diversity.~~
- ~~As the ICW concept is based on integration into the immediate and adjacent environment, site characterisation must investigate how this requirement can be achieved and optimised.~~
- ~~The Management Company must ensure that the nature and properties of the influent are known, that adequate land space is available and that the system can operate with low or zero energy requirements.~~
- ~~Given the nature of these systems in Ireland, potential developers must provide the Planning Authority with sufficient baseline information to enable planning/discharge conditions to be set should the Nature Based Solution be deemed appropriate within the settlement for a specific site.~~
- ~~The Management Company will be required to put in place an Emergency Response Plan for the system which will outline the procedures which must be put in place should monitoring indicate exceedances of emissions limit values, where a failure in the system occurs, where the system becomes inundated due to severe or adverse weather conditions or through inappropriate influent amongst other occurances.~~

Submission No: S2/1009 –Ann Cronin, Clare County Council (Water Service Capital)	
Relevant Chapters / Topics	• **Wastewater Treatment Plants**

Summary of Issues Raised in Submission

This submission relates to wastewater treatment plants in towns and villages.

- Kilrush plant is under construction and due for completion mid 2023.
- Kilkee plant is at design stage anticipated it will be completed by late 2025 subject to planning.
- Miltown Malbay plant needs upgrading and recommends an objective for the upgrade to include Spanish Point.
- Ballyvaughan has a septic tank but no treatment plant. A WWTP scheme is at design stage and would recommend an objective to support this. Completion by mid 2025.
- Liscannor plant is under construction and due completion early 2023.
- Kilfenora plant is currently being upgraded with completion mid 2023. Contrary to what is in Draft the plant will not have increased capacity.
- Killadysert has a septic tank but no plant. Would recommend an objective for provision of WWTP.
- Carrigaholt has no plant and would recommend an objective for provision of WWTP.
- Cooraclare has no plant and would recommend an objective for provision of WWTP.
- Doolin has no plant and would recommend an objective for provision of WWTP.
- Labasheeda has no plant and would recommend an objective for provision of WWTP.
- Newmarket on Fergus plant will be upgraded in addition to construction of new effluent pipeline and new outfall subject to permission.
- Clarecastle sewerage scheme will deliver wastewater to treatment plant in Clareabbey and is due for completed early 2023.

Chief Executive's Response

I wish to thank Ann Cronin for the submission, made on behalf of Clare County Council Water Services Capital) and address the issues raised as follows:

I refer to Submission S2/013 and compare the information provided in the current submission and that submission, as regards the up-to-date position of capital investment works to water and wastewater infrastructure within the County.

Both submissions are consistent in noting that projects to improve wastewater infrastructure at the following settlements are ongoing:

- Kilrush;
- Kilkee;
- Ballyvaughan;
- Liscannor;
- Newmarket on Fergus;
- Clarecastle.

This submission raises an issue regarding the description of the ongoing works at Kilfenora, in that same may not provide for an increase in capacity. The information contained within the submission appears to correlate with that. I propose to address this issue in my recommendation.

According to the Volume 3D Miltown Malbay Settlement Plan, "Miltown Malbay is served by water from the West Clare Regional Water Supply and Miltown Malbay Wastewater Treatment Plant. There is sufficient capacity in both to meet the needs of the target population". The information received from Irish Water in CDP submission S2/013 indicates that a feasibility study is intended to proceed which will address the identified limitations regarding emissions, with delivery of works (if they are deemed feasible occurring towards the end of the development plan period. I do not regard the information available as sufficient to include text or objectives in the Miltown Malbay Settlement Plan or in the Spanish Point Settlement Plan. At Spanish Point, according to the Draft CDP future development will be subject to compliance with the EPA Codes of Practice for on-site wastewater treatment. I do not propose to amend the Draft CDP in this regard.

According to Irish Water in CDP submission S2/013, it is anticipated that the Killadysert Wastewater Treatment Plant project will be completed within the lifetime of the Draft Plan. The draft CDP Killadysert Settlement Plan contains text stating that "Kiladysert has its own wastewater treatment plant but an upgrade is required in order to accommodate future development". I consider that this is adequate policy support for the upgrade. I do not propose to amend the Draft CDP in this regard.

The provision of wastewater treatment plants at Carrigaholt, Cooraclare, Doolin and Labasheeda is not mentioned in the information provided to Clare County Council regarding Irish Water's capital investment plans however I agree that the CDP should positively support the provision of wastewater treatment and disposal infrastructure in these and all other un-serviced settlements across the county. I therefore consider it appropriate to include an objectives on foot of this submission.

I also consider that specific reference should be made to the Multi-Annual Rural Water Programme 2022-2025 and the amendment below includes for same.

Chief Executive's Recommendation

I recommend that Volume 3D Kilfenora Settlement Plan is amended as follows:

> *Kilfenora is connected to the Ennistymon Regional Water Supply. There is an existing wastewater treatment plant serving the village which has sufficient capacity to meet the needs of the target population over the plan period. An upgrade of the existing wastewater treatment infrastructure ~~to increase capacity~~ is expected to be completed in 2022.*

I also recommend the following amendment to Vol 1 Written Statement, Chapter 11, Section 11.4.3 Wastewater Management, Objective CDP11.34 as follows.

Development Plan Objective: Rural Wastewater Treatment Programmes	
CDP11.34	It is an objective of Clare County Council: a) To support investment in the sustainable development of rural waste water treatment programmes and the initiatives of Irish Water, communities and developers in small rural settlements to identify sustainable solutions subject to available funding for such services including the Rural Regeneration and Development Fund of the *NDP and the Multi-Annual Rural Water Programme 2022-2025 Measure 8 – Waste Water Collection and Treatment Needs for Villages and Settlements without access to Public Waste Water Services.* b) To support the provision of centralised wastewater treatment plants at Broadford, Carrigaholt, Cooraclare, Doolin and Labasheeda within the lifetime of the lifetime of this plan. C ~~b~~) To support the servicing of rural villages (serviced sites) to provide an alternative to one-off housing in the countryside; and d ~~c~~) To ensure that any private wastewater treatment system proposed complies with the environmental requirements of Objectives CDP4.2, CDP4.5 and CDP3.1 of this plan.

Clare County Development Plan
2023–2029

Public Rights of Way

Section 1 Introduction

Section 14(1) of the Planning and Development Act, 2000, as amended, requires "*where a planning authority proposes to include, for the first time, a provision in a development plan relating to the preservation of a specific public right of way, it shall serve notice (which shall include particulars of the provision and a map indicating the right of way) of its intention to do so on any owner and occupier of the land over which the right of way exists".*

Section 10(2(o of the Act states that *"the preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan".*

The following Public Rights of Way are proposed in Appendix 6 of Volume 1 of the Draft Clare County Development Plan 2023-2029 which was on public display from the 10th December 2021 to the 28th March 2022 (both dates inclusive:

- Turret Lane, Kilrush – connecting Grace Street and Vandeleur Demesne
- The Rocky Road, Ennis (part of)

In total, 408 no. submissions were received regarding the preservation of public rights of way. These submissions relate to requests for an additional right of way at Doonass, Clonlara. In relation to these submission, please note the following:

1. Submission received and acknowledged by Clare County Council where the name and address was clear on submissions. Upon receipt the recipient made contact and advised they had not made the submission. This related to 5 submissions of which one followed up with a written confirmation.
2. Three submissions were received where the name was indecipherable and the CE report could not list as a submission in accordance with the P&D Act Sec 11(4)(3).
3. Acknowledgment letters for 20 submissions were returned to Clare County Council undelivered. These have been included as submissions.

At this stage, and in my role as Chief Executive, I would like to thank all of those who took the time to make a submission or observation. All submissions will be taken into consideration in the on-going preparation of the Clare County Development Plan 2023-2029 and the preservation of public rights of way.

This report lists those who made submissions to Appendix 6 of Volume 1 of the Draft Clare County Development Plan 2023-2029 and summarises the issues raised. I then set out my response to each of the issues raised and make a recommendation in relation to the preservation of the rights of way in the Clare County Development Plan 2023-2029.

This report is submitted to the Elected Members of Clare County Council on 10th July 2022.

Section 2 Legislative Requirements

Section 12(4) of the Planning and Development Act 2000, as amended, sets out the statutory requirements that I am obliged to adhere to in the preparation of this Chief Executive's Report and on the on-going preparation of the Clare County Development Plan 2023-2029. The Chief Executive's Report must list the persons or bodies who made submissions, summarise the issues raised or observations received and must give my response to these matters having regard to the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, any relevant policies or objectives of the government or of any Government Minister and any observations that have been made by the Minister for Housing, Local Government and Heritage.

Under Section 12(5) of the Planning and Development Act 2000, as amended, following receipt of this document, you the Elected Members, are required to consider the Draft Development Plan and the Chief Executive's report. Your consideration of these matters must be completed within 15 weeks of the receipt of this report (10th July 2022) in accordance with the Planning and Development Act 2000, as amended, (allows for 12 weeks) and the Planning and Development (Amendment) (No 3) Act 2021 (where an additional 3 weeks was apportioned).

This Chief Executive's Report herein submitted to you, the Elected Members, complies with the requirement of section 12(4) of the Planning and Development Act 2000, as amended, and Section 9A(2) of the Planning and Development Act, 2000, as amended.

Section 3 Next Stage

In accordance with Section 12(5) of the Planning and Development Act 2000, as amended, following receipt of this document you, the Elected Members must consider the Draft Development Plan and this Chief Executive's Report. Following this period of consideration, where it appears to the Members of Clare County Council that the Draft Plan should be accepted or amended, you may, by resolution, accept or amend the Draft Clare County Development Plan 2023-2029.

Section 4 Summary of Submissions made and Chief Executive's Response to the Issues Raised

Introduction

On 10th December 2021 the Planning Authority put on display the Draft Clare County Development Plan 2023-2029, comprising of 16 Volumes. The process commenced with a notice in the local newspaper and the commencement of public consultation, having regard to the provisions of Section 12 of the Planning and Development Act, 2000 (as amended.

In all 408 no. formal written submissions were received by Clare County Council within the statutory timeframe specifically in relation to Rights of Way.

In the following part of Section 4, I have provided a summary of the issues raised in each of the 408 formal written submissions. In addition, for each individual submission I have put forward my response to the issues raised, taking account of the proper planning and sustainable development of the area, of any direction from the Members of the Planning Authority arising from the Chief Executive's Report to the Members at 'pre-draft' public consultation stage in accordance with Section 11(4) of the Act, the statutory obligations of any local authority in the area, and any relevant policies or objectives for the time being of Government or of any Minister of the Government.

Accordingly, please find below a summary of the issues raised in each submission together with my response and recommendations.

Doonass Public Right of Way Submissions – Table 1

Submission No	Person or Organisation making Submission	Submission No	Person or Organisation making Submission
S2/029	Juile Crowe & Grainne O'Connell	S2/058	Bridget Conlon
S2/030	Eoin Meehan, John Moloney & Jad Hastings	S2/059	Dillon Family (Eddie)
S2/031	David Beckett	S2/060	Bernadette Murphy
S2/032	Jennifer Moran Stritch	S2/061	Donal Spaight
S2/033	Paul Dowling	S2/062	Mary Corkery
S2/036	May O Meara	S2/064	Patrick Murphy
S2/037	Clare Hartigan	S2/065	Cathal O'Connell
S2/038	John Conlon	S2/066	Kathleen Spaight
S2/039	Seamus Walsh	S2/069	Denis McKeon
S2/040	Leslie Hartigan	S2/070	Victor Brown
S2/041	Tom O'Brien	S2/071	Daithi Byrne
S2/042	Ger Meehan	S2/072	Liam Coughlan
S2/043	Katie Meehan	S2/073	Mary Moriarty
S2/044	John O Meara	S2/074	Frances Gleeson
S2/045	Declan Hannan	S2/075	Pat Couley
S2/048	Kitty O'Brien McLoughlin	S2/083	Arthur Stritch
S2/050	Francis Moloney	S2/165	Joseph Quinlivan
S2/051	Mick Stritch	S2/168	Geraldine Quinlivan
S2/052	Sean Hanly	S2/170	Siobhan Boyd
S2/053	Bridget Killeen	S2/171	Fiona O'Brien Mazwell
S2/055	Kieran Considine	S2/545	Patricia Harkett
S2/057	Niamh Gully		

Relevant Chapters/Topics

- **Public Right of Way**
- **Doonass**

Summary of Issues Raised in Submission

All the submissions listed above relate to Doonass, Clonlara, requesting that the restrictions put in place to impede access be removed. The submissions include the following points:

- Request CCC to protect the right of way at Doonass
- Access has been open for generations
- This is a valued local amenity that is an enormous loss to the community and visitors
- Access to the river for fishing etc. is now blocked by the owners of the old Angler's Rest
- The right of way has been a big part of people's lives growing up
- The right of way along the river via the Cead Mile Failte steps existed for generations and should be restored allowing access to Castleconnell
- The submission seeks guarantees that have uninterrupted access to Doonass graveyard
- This is a much loved walk and a major loss to the people of Clonlara and Limerick city
- The submission asks if, and hopes that, the Clare County Development Plan will assist in upholding the original right of way
- The country is spending on creating greenways on one hand and on the other the council and government are not fighting to protect what is already there.

- If the owners are allowed to close the right of way it will set a precedent for other landowners to do the same
- It should not be left to the local community to take out court orders to have the ROW opened up
- Important to have access by the Kayak Club to the water for health and safety purposes
- With zoned land for residential development in the parish, more amenities are needed and cannot afford to lose this one

Chief Executive's Response

I want to thank all the authors for their submissions and I wish to respond as follows.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated right of way at this location within the County Development Plan.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Doonass Public Right of Way Submissions – Table 2

Submission No	Person or Organisation making Submission	Submission No	Person or Organisation making Submission	Submission No	Person or Organisation making Submission
S2/158	Fiona McCarthy	S2/328	Flan Haskett & Patricia Haskett	S2/447	Patrick & Rosemarie O'Hara
S2/159	Angela Grimes	S2/329	Aoife O Farrelly	S2/448	Bridget Killeen
S2/160	Stacey Carmody	S2/330	Linda Hannon & Linola Hannon	S2/449	Carmel & Teresa Barry
S2/163	Denis McKeon	S2/331	Liam O'Connell & Miriam O'Connell	S2/450	PJ O'Connell
S2/178	M Begley (Doonass)	S2/332	Bridget Conlon	S2/451	Paul & Christine Collins
S2/179	Bernadette Walsh	S2/333	Brendan Burke	S2/452	Rose O'Donoghue
S2/180	Jennifer O'Gorman	S2/334	M O'Sullivan	S2/453	Helen Stritch & Mike Stritch
S2/181	Louise Cosgrove	S2/335	Frank Hussey	S2/454	Matt Byrnes
S2/182	Patrick O'Dwyer	S2/336	Orla Fleury	S2/455	Pauline Loughnane
S2/183	J Hoster	S2/337	Aisling Hunt	S2/456	Marie, Pat, Helen, Paula, Rachel, Kevin and Martin Real
S2/185	Jane Smith	S2/338	Eva Hayes	S2/457	William Walsh
S2/186	Rebecca O'Meara	S2/339	Padraig Flannagan	S2/458	Noreen Bourke
S2/187	Siobhan Farrell	S2/340	Marie McMahon	S2/459	Caroline Sherry
S2/188	Diarmuid O'Meara	S2/341	Ger Hickey	S2/460	Austin Quinn
S2/189	Paul O'Gorman	S2/342	Noel Galvin	S2/461	Michael McLoughlin
S2/190	Catherine Hannan	S2/343	John Galvin Jnr	S2/462	Catherine Dunne
S2/191	Moira Galvin	S2/344	Sarah Henchy	S2/463	Evan Conroy
S2/192	Michelle Powell	S2/345	Clodagh Mason	S2/464	Mark Ryale
S2/193	Mike O'Shea	S2/346	Audrey Carroll	S2/465	Patrick Meskell
S2/195	Roisin Powell	S2/347	Anita Broderick	S2/466	Emmie Byrnes
S2/196	Michael Powell	S2/348	Johnny Murphy	S2/467	Breda Sheary
S2/197	Ailbhe Browne	S2/349	Brian MacMahon	S2/468	Tom Sheary
S2/231	Annette Conway	S2/350	Maria Hillyard	S2/469	S. Bourke
S2/232	Patricia O'Shea	S2/351	Kathleen Hackett & Richard Hackett	S2/470	Seamus Walsh
S2/233	John Egan	S2/352	Carmel Hayes	S2/471	Millie Samiche
S2/234	Paddy Burke	S2/353	John O'Brien	S2/472	Ann Neligan
S2/235	Lavina O'Shea	S2/354	Catherine Deegin	S2/473	Gina O'Brien
S2/236	Dermot McMahon	S2/355	Sylvia Clancy	S2/474	John Mason
S2/237	Arthur & Jennifer Stritch & Family	S2/356	Colm Honan	S2/475	Mary O'Sullivan
S2/238	Cepta Kennedy	S2/357	Noel Murphy	S2/476	Philip Quinlivan
S2/239	Patrick A. Crowe	S2/358	Brian Mason	S2/477	Paul O'Driscoll & Pat O'Leary
S2/240	Brendan Corkery	S2/359	Martin O'Shea	S2/478	Roisin O'Leary
S2/241	Jason O'Connell	S2/360	Seamus McMahon	S2/479	Anthony Nihill
S2/242	Ger Burke	S2/361	Mary Conlon	S2/480	Johnny Murphy, Chairman Clonlara GAA Club, on behalf of Clonlara GAA Club
S2/243	Tom Glasheen	S2/362	Dylan O'Shea	S2/481	Sean Quigley
S2/244	Y. Shortt	S2/363	Judy Clohessy	S2/482	Maria McLoughlin
S2/245	Feargal Marrey	S2/364	Tony Carey	S2/483	John Galvin
S2/246	Aedín O'Leary	S2/365	Daithi O Shanahan	S2/484	Trevor Kiely
S2/247	Trevor Griffin	S2/366	Louise O'Carroll	S2/485	Eoin Galvin

S2/248	Edel O'Brien	S2/367	Teresa Nolan	S2/486	Pat Hynes
S2/249	Evelyn Cosgrove	S2/368	Larry Maher	S2/487	John S Leary
S2/250	Joanna Leahy	S2/369	Barbara O'Connell	S2/488	Declan Smith
S2/251	Kevin Lynch	S2/370	James Butler	S2/489	Januss Bieoh
S2/252	Miriam Lynch	S2/371	John Killeen	S2/490	Flan Reale
S2/253	Peter O'Reilly	S2/372	Rose Smith	S2/491	Marian & Michael Carmody
S2/254	Patricia Jones	S2/373	Seamus McNamara	S2/492	Ray McMahon
S2/255	Marie O'Driscoll	S2/374	Joseph Meskell	S2/493	Geraldine Connolly
S2/256	Patrick McDonnell	S2/375	Tom & Rose Fitzgerald	S2/494	Richard Quinn
S2/257	Jennifer & Andrew Kerr	S2/376	Anne P. Kenny	S2/495	David Hayes
S2/258	Marie Meehan	S2/377	Diana Clancy & Joe Clancy	S2/496	Janis Molly
S2/259	Mary Moriarty	S2/378	Anne O'Connell	S2/570	Eleanor Kingston
S2/260	Marie & Patrick Sheridan	S2/379	John O'Connell	S2/571	Alice Lynch
S2/261	Cathy Quin	S2/380	Cora Canny	S2/572	Holly McGuire
S2/262	Breda O'Meara	S2/381	Alan Nihill	S2/573	Aobha Byrnes
S2/263	Jessica Wallace	S2/382	Senan Nihill	S2/574	Helen & James O'Neill
S2/264	Michelle Cotter	S2/383	Máire B Nihill	S2/575	Leslie Hartigan
S2/265	Richard Feeney	S2/384	Gillian Nihill	S2/576	Ciara Hayes
S2/266	Caroline O'Connell	S2/385	Ann Moloney	S2/577	Ian Williams
S2/267	Maire Hanly	S2/386	Paul Moloney	S2/578	Brendan Brown
S2/268	Michael O'Sullivan	S2/387	Nora Tierney	S2/579	Liam Burns
S2/269	Paul Noonan	S2/388	Rose Costelloe	S2/580	Lisa Corcoran
S2/270	J Lacy	S2/389	Francis Neylon	S2/581	Saoirse Byrnes
S2/271	Deirdre Ryan	S2/390	Rachel Sheary	S2/582	Lesley & Derek Coughlan
S2/272	A Dowling	S2/391	John Conlon	S2/583	Moya McMahon
S2/273	George Lee	S2/392	John Nihill	S2/584	Johnathan O'Shaughnessy
S2/274	Jim & Patsy Clancy	S2/393	Tom Costelloe	S2/585	Clare Hartigan
S2/275	John Moloney	S2/394	Paul Clancy	S2/586	Eamon & Ray McQuade
S2/276	Donal & Kathleen Spaight	S2/395	Eamon Noonan	S2/587	Nadine O'Keeffe
S2/277	Niall Monahan	S2/396	Eddie Dillon	S2/588	Elaine White
S2/278	Frances Gleeson	S2/397	Sandra Ward	S2/589	Eoin Meehan
S2/279	Matt & Margaret Page	S2/398	Martin Barry	S2/590	Carmel McGrath
S2/280	Declan Hannan	S2/399	Mary Corkery	S2/591	Anthony McGuinness
S2/281	Maureen O'Brien	S2/400	Brendan O'Leary	S2/592	Brendan O'Connell
S2/282	Michael O'Connell	S2/401	Mairead Doyle	S2/593	Margaret Kennelly
S2/283	Brian Killeen	S2/402	Joan Carmody	S2/594	Leonardo Beretta
S2/284	Karen O'Connell	S2/403	Niamh Lane	S2/595	Jason Hayes
S2/285	Joseph Madden	S2/404	Emer Liddy	S2/596	Gillian Pavetesu
S2/286	C Halley, Runard	S2/405	Mary Dee	S2/597	Hollie McGuinness
S2/287	Michael Madden	S2/406	Angela Martin	S2/598	Paula Byrnes
S2/288	John Lynch	S2/407	M. Hanrahan	S2/599	Alan Condron
S2/289	Angela Halley	S2/408	Stephanie Scanlon	S2/600	Barry Nihill
S2/290	Joe Halley	S2/409	Danny Chaplin	S2/601	Catherine Joyce
S2/291	Edel Gilroy	S2/410	Vera O'Leary	S2/602	Caitriona Carey & Paddy Carey
S2/292	Marie Guinane	S2/411	Christina & Michael Madden	S2/603	Tim Dunne
S2/293	James Guinane	S2/412	Marion Maher	S2/604	Patricia Furlong
S2/294	Joe Guinane	S2/413	Craig Chaplin	S2/605	Marc Kiely & Karen Kiely
S2/295	Jason Quinlivan	S2/414	Stiofán McMahon	S2/606	Daire O'Meara

S2/296	Michael Mason	S2/415	Deirdre Wethill	S2/607	Geraldine Dunne
S2/297	Sean Meskell	S2/416	Marie Keating	S2/608	Dr Patrick Linnane
S2/298	Sinead, David, Blaithin, Roisin, Diarmuid, Moya & Daithi Byrnes	S2/417	Daniel O'Connor	S2/609	John Moloney & Jennifer Powell
S2/299	Una Horgan	S2/418	John Keehan	S2/610	Frank Barry & Mary Barry
S2/300	Triona Doody	S2/419	Mary McInerney	S2/611	Mary Beggleton
S2/301	Josephine Mileely	S2/420	M O'Dwyer	S2/612	Keith Collins
S2/302	Gillian Dilmac	S2/421	John Madden & Tom Madden	S2/613	Enda Griffin
S2/303	Gerry McMahon & Eileen McMahon	S2/422	Paul Barry	S2/614	Patrick McNamara
S2/304	Gobnait Kelly	S2/423	Josephine, Jean, Ger & Roisin Begley	S2/655	Caroline & Pat Obrien
S2/305	Georgina & Niall Culligan	S2/424	Carmel Duffy & Gavin Duffy	S2/656	Anthony Leddin
S2/306	Michael Mulholland	S2/425	Noel Madden & Mary Madden	S2/657	Jim & Mary O'Connell
S2/307	Patsy Sheehan	S2/426	Mary Nihill	S2/658	M Walsh
S2/308	Patrick Sheedy	S2/427	John Killeen	S2/659	Betty Hayes
S2/309	Patrick Mason	S2/428	Teresa O'Reilly	S2/660	Anne Mason
S2/310	Miriam Delaney	S2/429	Liam Cusack	S2/661	Michael Begley
S2/311	Veronica Callinan	S2/430	Anne Hogg & John Hogg	S2/662	John Fitzgerald
S2/312	Karen Savage & Ken Savage	S2/431	Gerry O'Neill	S2/663	John McCormick, Miriam McCormick, Louis McCormick, James McCormick and Joe Hayes
S2/313	Stephen Hughes	S2/432	Dolores Marsh	S2/664	Jim O'Grady & Maria Power
S2/314	Mary Hughes & William Hughes	S2/433	Nicola Chaplin	S2/665	John Kiely
S2/315	Eve Kearney & Kenneth Haskett	S2/434	Pat Conroy	S2/666	Dympna Harty
S2/316	Michael Wallace	S2/435	Tom Hannan	S2/667	PJ Dunne
S2/317	Brian Costello & Anna Costello	S2/436	Lena O'Connor	S2/668	Michael Begley
S2/318	Julie Crowe	S2/437	Mary Cullane	S2/960	Ruth Scanlon
S2/319	Dolores Cleary	S2/438	Miss S. Staunton	S2/961	Kieran Clancy
S2/320	Ross Lynch	S2/439	Bob Heuston	S2/962	Robert Mangan
S2/321	Francis A Moloney	S2/440	Claire & Sean O'Reilly	S2/963	Stephen Mangan
S2/322	George Crowe	S2/441	Lillian & Tim O'Donoghue	S2/964	Donal, Siobhan, Donncha, Donall Og and Aibhlin Madden
S2/323	Teresa Hannan	S2/442	Tina McLoughlin	S2/965	Nan & Ger McGuinness
S2/324	Seán O hAnnáin	S2/443	Kathleen Nihill		
S2/325	Colette Keniry	S2/444	Linda O'Reilly		
S2/326	Cathal Chaplin	S2/445	Michael Hastings		
S2/327	Stephen Chaplin	S2/446	Eddie Monahan		

Relevant Chapter/Topic

- **Public Right of Way**
- **Doonass**

Summary of Issues Raised in Submissions

In the submissions listed above it is requested that sections of the Doonass looped walks are designated in the Draft Plan as a public right of way. Maps have been included identifying the route concerned.

The submissions reference an application for a declaration, reference R20-44, and referral to An Bord Pleanála, ABP-308442. The submissions also refer to the provisions of section 10 (2) (o) of the Planning & Development Act 2000, as amended, where it is stated that the Development plan may include objectives for the preservation of rights of way and the identification of public rights of way on at least one map forming part of the Development Plan. The submissions note Section 10.15 and Objective CDP10.13, and Section 11.2.12, Objective CDP11.20 and Appendix 6 of the Draft Plan relate to public rights of way.

It is requested that the route south of the graveyard and along the north bank of the River Shannon as indicated on the maps attached to the submissions are added to the list of public rights of way for the following reasons:

- The historic usage of the route and evidence of this is included in the submissions.
- To provides access to and lead along the riverbank
- This is a vitally important amenity and is a social and economic asset to the area.
- There is a need to ensure that public rights of way in the area are secured for the future in light of future changes such as the area's inclusion in the Limerick-Shannon MASP area, proximity to Limerick City and UL, and the proposed SDZ which could lead to Clonlara becoming a dormitory [commuter] village.
- There is a steady increase in population in Clonlara and forthcoming planning application for 70 dwellings in the village.
- It is very scenic locality and there is a lack of any tourism structure/facilities in the immediate area. It is imperative to draw visitors into the area and the preservation of access to River Shannon is vital.
- The development of this walking/recreational and fishing route close to Clonlara would be a major benefit for the economic, social and environmental growth for the local community and could direct and enhance community partnerships among the various groups operating within the locality.

Chief Executive's Response

I wish to thank all the authors for their submissions and I wish to respond as follows.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated right of way at this location within the County Development Plan.

Chief Executive's Recommendation
I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Submission No: S2/034 – Eileen Clancy	
Relevant Chapters / Topics	• **Public Rights of Way** • **Doonass**
Summary of Issues Raised in Submission	
This submission relates to a concern regarding the loss of access/right of way at Doonass to the Bank of the River Shannon. It requests a pathway be constructed along the river to facilitate the walk from Castleconnell to the Cead Mile Failte bridge.	
Chief Executive's Response	
I thank Eileen Clancy for her submission, and I wish to respond as follows. A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a right of way by simply including same in the County Development Plan. Based on the foregoing Clare County Council is unable to include the preservation of a designated right of way at this location within the Clare County Development Plan 2023-2029.	
Chief Executive's Recommendation	
I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.	

Submission No: S2/035 - Stuart Edwards	
Relevant Chapters / Topics	• **Public Rights of Way** • **Doonass**
Summary of Issues Raised in Submission	
This submission refers to a right of way to the River Shannon at Doonass. The author indicates that he is an angler who has accessed the River Shannon in this area all his life. He holds an Angling permit but was refused access to the river, despite a court order stating anglers are welcome.	
Chief Executive's Response	
I thank Stuart Edwards for his submission and I wish to respond as follows. A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a right of way by simply including same in the County Development Plan. Based on the foregoing Clare County Council is unable to include the preservation of a designated right of way at this location within the Clare County Development Plan 2023-2029.	
Chief Executive's Recommendation	
I recommend that no amendments are made to the Draft Clare County Development Plan 2023-2029 on the basis of this submission.	

Submission No: S2/046 – Marie Meehan	
Relevant Chapters / Topics	• **Public Right of Way** • **Doonass**
Summary of Issues Raised in Submission	
This submission relates to access to and designation of a right of way along the River Shannon at Doonass. The author states that she grew up using the Right of Way, that previous generations of the family had done so, and sees it as unfair that the new owners of the Angler's Rest property can decide to close it. The submission seeks that the walkway is given back to the local community. The walkway should also be developed as has been done in other villages in the region.	
Chief Executive's Response	
I thank Marie Meehan for her submission and acknowledge the importance of the issues she has raised. A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a right of way by simply including same in the County Development Plan. Based on the foregoing Clare County Council is unable to include the preservation of a designated right of way at this location within the Clare County Development Plan 2023-2029.	
Chief Executive's Recommendation	
I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.	

Submission No: S2/056 - Pat Dillon	
Relevant Chapters / Topics	• **Public Right of Way** • **Doonass**

Summary of Issues Raised in Submission

This submission refers to the Castleconnell to Doonass section of the River Shannon and indicates that the submitter is a member of the Limerick Kayak Club and a regular user of same.

The author indicates that full bank access of the river is extremely important to the Club for safety reasons in case of an accident on the river. The ability to move freely up and down the bank around the Doonass area is very important.

The submission requests that this access route needs to be maintained for the Kayak Club.

Chief Executive's Response

I thank Pat Dillon for his submission and acknowledge the important issues raised.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated right of way at this location within the Clare County Development Plan 2023-2029.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Submission No: S2/063 - Johnny Murphy	
Relevant Chapters / Topics	• **Public Right of Way** • **Doonass**

Summary of Issues Raised in Submission

This submission refers to a right of way at Doonass, located beside the graveyard and former Public House (the Anglers Rest) leading to the "Cead Mile Failte Gate".

The author indicates that this right of way has been in use by countless generations of people from Clonlara/Castleconnell and tourists wanting to view the turret of the Massey family and Falls of Doonass.

The author indicates that his family were born in Doonass and have used this route for as long as he can remember. The author considers it was very wrong to deny local people the "right of way".

Chief Executive's Response

I thank Johnny Murphy for his submission and I wish to respond as follows.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated right of way at this location within the Clare County Development Plan 2023-2029.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Submission No: S2/067 - Sinead Cunningham	
Relevant Chapters / Topics	• **Public Right of Way** • **Doonass**

Summary of Issues Raised in Submission

This submission refers to a right of way at Doonass at a former Public House.

The author requests that the right of way is reopened and indicates that the right of way should never have been closed as valuable history is being lost to all.

The author asks what will become of houses such as Landscape House and the Castle ruins and whether they should be preserved?

Chief Executive's Response

I thank Sinead Cunningham for her submission and acknowledge the important issues raised. I wish to respond as follows.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated public right of way at this location within the Clare County Development Plan 2023-2029.

In relation to the queries raised relating to the preservation of Landscape House and the Castle ruin, I can confirm that Landscape House is not currently on the Record of Protected Structures. The Castle is a recorded monument and is protected under the Monuments Act, with a Record of Monuments and Places number CL063A001.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Submission No: S2/068 - Johnny Quirke	
Relevant Chapters / Topics	• **Public Right of Way** • **Doonass**
Summary of Issues Raised in Submission	
This submission refers to a walking route at Doonass. The author requests that the Cead Mile Failte down by the former Anglers Rest pub is reopened to the public. He has many fond memories of walking there as a child. The Shannon area should be promoted everywhere and to cut off such a beautiful part of it, is a disgrace. Local TDs and the Council should represent the people not just one house.	
Chief Executive's Response	
I would like to thank Mr. Quirke for this submission and acknowledge the important issues raised. I wish to respond as follows. A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan. Based on the foregoing Clare County Council is unable to include the preservation of a designated public right of way at this location within the Clare County Development Plan 2023-2029.	
Chief Executive's Recommendation	
I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.	

Submission No: S2/092 – Tom Galvin	
Relevant Chapters / Topics	• Public Right of Way • Doonass • Environment

Summary of Issues Raised in Submission

This submission sets out the following points.

- Over the past two years the community and visitors to Doonass have been denied access to the River Shannon and to the 'Cead Mile Failte' steps and gate which prevents access to the river walk from Doonass to Castleconnell.
- Historically all visitors would have unimpeded access to river walks along the riverbank.
- Access is now prevented by fencing and locked gates without planning permission by the owners of the former Anglers Rest Public House (now a private dwelling).
- The stone wall and steps leading to the river walk may need to be considered as a 'protected structure' to prevent removal or interference.
- This gated access is also access for licensed ESB fishermen.
- There is continuous destruction of wildlife habitat with removal of crags and hedgerows and consequent loss of wildlife.
- There has been a disappearance of the corncrake and a decline in bird life including the serious decline in numbers of the Curlew (and cuckoo) that were yearly visitor to the Clonlara area and in particular Errina bog for nesting.
- Errina bridge now has water penetration through the beautiful stone work as a result of pipework been laid above and a structure inspection is required.
- Errina Canal - an organisation (Waterways Ireland ?) installed a "temporary" timber wall there about 10 years ago and works around the adjacent lock carried out by Waterways Ireland to fence off the lock for safety purposes is now overgrown and requires more work and possible replacing of existing lock wall with lock gates.

Chief Executive's Response

I thank Tom Galvin for his submission and acknowledges the important issues raised, and I wish to respond as follows.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated public right of way at this location within the Clare County Development Plan 2023-2029.

The Errina Bridge is a protected structure (RPS 525) and any works would require planning permission or a Section 57 exemption. I have arranged for the Architectural Conservation Officer to conduct a site visit to assess the structure and to follow up with the relevant bodies as required.

I note the comment in relation to the serious decline of wildlife over the past number of years and I note that through the Draft Development Plan a "buffer space" zoning objective has been

identified, which protects identified areas of an important environmental value from development. Together with protective conservation objectives this will greatly assist in arresting this decline in biodiversity across our county. The Council is acutely aware of the decline in numbers of Curlew right across the county and in particular breeding pairs. The NPWS have commenced the Curlew Conservation Programme which involves locally based teams of advisors, community engagement and nest protection officers, working closely with landowners and other local interests, to protect Curlew nesting attempts and to improve habitat quality. The programme places the landowner and the birds at the centre of all considerations, with key goals of giving the Curlews a better chance of rearing chicks and stopping the population sliding further towards extinction. Clare County Council will assist with the implementation of this programme wherever possible.

Regarding the Errina Canal, the Council have implemented CDP Objective 6.7 part (g) in the current Clare County Development Plan 2017-2023 which includes a survey of the entire length of the Errina Canal in conjunction with the ESB and Waterways Ireland. The results of this survey will inform the requirements for any future work to the canal that may be required and can be facilitated in line with its protected status.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Submission No: S2/117 - Doonass Kiltenanlea Graveyard Committee	
Relevant Chapters / Topics	• **Public Right of Way** • **Doonass**

Summary of Issues Raised in Submission

This submission sets out concerns in relation to the obstruction of a 'de facto' Right of Way at Doonass for nearly two years which has impacted on the sacredness and safety of the graveyard with disturbances when access for walkers and anglers was impeded. Traditionally safe access was provided via a path in front of the Angler's Rest. With this path blocked, walkers are forced to call into neighbouring houses and to disturb the tranquillity of the nearby St. Senan's Holy Well.

The submission also notes safety concerns as the Cead Mile Failte stile is no longer accessible and walkers having to scale a steep slippery embankment in the graveyard, presents high risk of accident which would be serious.

Chief Executive's Response

I thank Doonass Kiltenanlea Graveyard Committee for their submission and acknowledge the important issues raised and I wish to respond as follows.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated public right of way at this location within the Clare County Development Plan 2023-2029.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Submission No: S2/150 – John McEvoy	
Relevant Chapters / Topics	• **Public Right of Way** • **Doonass**

Summary of Issues Raised in Submission

This submission sets out concerns in relation to the fencing off and blocking of access to the river at Doonass, particularly for those with limited mobility, including anglers, who are unable to access the salmon pools along that stretch of the river as access for walkers is now only available from the foot bridge, a walk which is unmanageable for those with limited mobility.

The submission requests that a layer of tarmac is provided along the canal bank road for the following reasons:

- Three families use this roadway, and it is also a walkway for walkers.
- The owner of this roadway puts a lot of time and effort upkeeping it but he seems to be in a losing battle with the elements.
- It gets very wet and muddy when it rains and all families are continually trying to keep cars in a reasonable condition.

Chief Executive's Response

I thank John McEvoy for this submission and acknowledge the important issues raised and I wish to respond as follows.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated public right of way at this location within the Clare County Development Plan 2023-2029.

With regard to the specific request made in relation to surfacing the Canal bank road I have passed this request onto the Shannon MD for their evaluation. I do not consider this to be an issue that can be addressed/resolved through the development plan making process.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Submission No: S2/172 – Deirdre O'Brien McGivney	
Relevant Chapters / Topics	• **Public Rights of Way** • **Record of Protected Structures** • **Architectural Heritage**

Summary of Issues Raised in Submission

This submission sets out that the Council need to take more involvement in the traditionally walked area from the footbridge of Castleconnell to the Doonass falls.

In the submission it is noted that the gates and wall at Doonass is not listed under proposed Protected Structures. The architecture of this wall is beautiful and should be considered.

Chief Executive's Response

I thank Deirdre O'Brien McGivney for this submission and I wish to respond as follows.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a public right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated public right of way at this location within the Clare County Development Plan 2023-2029.

The gate and wall of Doonass House would fall under the curtilage of the Protected Structure, Doonass House, RPS 083. Specific mention of the gates is made under the description of the protected structure as set out in the Record of Protected Structures. The associated wall would also be protected. The owner is eligible to apply for grants under the Built Heritage Investment Scheme and Historic Structures Fund if they so wish.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Submission No: S2/536 – Clonlara Development Association (Doonass)	
Relevant Chapters / Topics	• Public Right of Way • Doonass • Greenway • Tourism

Summary of Issues Raised in Submission

Sets out the intention by the Development Association to develop a Heritage Trail around the parish of Clonlara, and that the route would be impeded close to the Shannon Riverbank at Doonass.

Development of the Heritage Trail would be of a major benefit for the local community. It would potentially be a spur off the planned Limerick-Scarriff Greenway and would be beneficial to tourism activity in this part of the County.

Future vision for Clonlara is that the Heritage Trail will be a starting point from which the district will be promoted and linkages made with other existing tourism projects. This project has promoted in a number of ways including it being show-cased at an exhibition in Killaloe, featured in Heritage Week and serialized on social media during 2020/21.

Concludes that it is vital that the trail can follow the natural circular route without hindrance or interference.

Chief Executive's Response

I thank the Clonlara Development Association for their submission and acknowledge the important issues raised.

A public right of way can only be established by statutory powers or by the dedication of a right of way to public use by the owner of the lands. It is not open for the Local Authority to establish a right of way by simply including same in the County Development Plan.

Based on the foregoing Clare County Council is unable to include the preservation of a designated right of way at this location within the County Development Plan.

In relation to the point raised in the submission regarding the Clare Heritage Plan I am advised that the Council's Heritage Officer has an on-going interaction with the Clonlara Development Association.

Chief Executive's Recommendation

I recommend that Clare County Council **does not preserve** the proposed route at Doonass as a public right of way.

Appendix 1: List of Late Submissions

Submission No	Person or Organisation making Submission	Date Rec'd
S2/1016	Theresa Marsh Chaplin	29/03/2022
S2/1017	John Corcoran	29/03/2022
S2/1018	Padraig Gunning	29/03/2022
S2/1019	Emma Cooper	29/03/2022
S2/1020	Broadford Development Association	29/03/2022
S2/1021	Denis Hynes	29/03/2022
S2/1022	Michael Nolan and Tom Nolan	30/03/2022
S2/1023	John and Miriam McCormick and Family	31/03/2022
S2/1024	Caroline and Pat Obrien	31/03/2022
S2/1025	PJ Meskell, Doonass & District Gun Club Association	31/03/2022
S2/1026	Pat Hartigan	01/04/2022
S2/1027	Pat Hartigan	01/04/2022

Clare County Development Plan
2023–2029

Appendix 2 -Public Notice

COMHAIRLE CONTAE AN CHLÁIR
CLARE COUNTY COUNCIL

NOTICE OF THE PREPARATION OF THE DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Notice is hereby given, pursuant to Part II, Section 12 of the Planning and Development Act 2000, (as amended), that Clare County Council has prepared a Draft Clare County Development Plan 2023-2029 for the functional area of the Council. The Draft Clare County Development Plan 2023-2029, on adoption will replace the existing Clare County Development Plan 2017-2023, as varied.

The Draft Plan is accompanied by a Strategic Environmental Assessment (SEA) Environmental Report, prepared in accordance with the SEA Directive (2001/42/EC) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No 436 of 2004) (as amended), and an Appropriate Assessment (AA) Natura Impact Report pursuant to the Habitats Directive (91/43/EEC) and the Planning and Development Act 2000 (as amended). A Strategic Flood Risk Assessment (SFRA) also accompanies the Draft Plan.

Volume 5 contains the Draft Clare Renewable Energy Strategy (RES) which has been subject to a separate Strategic Environmental Assessment (SEA) in accordance with the SEA Directive (2001/42/EC) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No 435 of 2004) (as amended). The associated consultation with respect to this assessment is also covered by this notice with the consultation running in tandem. Please note the findings of the SEA associated with the Draft Clare Renewable Energy Strategy have been incorporated into the Strategic Environmental Assessment-Environmental Report of the Draft Clare County Development Plan 2023-2029.

The Draft Clare County Development Plan 2023-2029 comprises the following draft documents:

- Volume 1 - Written Statement
- Volume 2 - Maps
- Volume 3 - Municipal District Written Statement & Settlement Plans
  - 3a Ennis Municipal District
  - 3b Shannon Municipal District
  - 3c Killaloe Municipal District
  - 3d West Clare Municipal District
- Volume 4 - Record of Protected Structures
- Volume 5 - Clare Renewable Energy Strategy & Strategic Environmental Assessment – Environmental Report
- Volume 6 - Clare Wind Energy Strategy
- Volume 7 - Clare Retail Strategy
- Volume 8 - Clare Housing Strategy
- Volume 9 - Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary
- Volume 10 - Environmental Appraisal of the Plan
  - 10a Appropriate Assessment – Natura Impact Report
  - 10b(i) Strategic Environmental Assessment – Environmental Report
  - 10b(ii) Strategic Environmental Assessment – Non-Technical Summary
  - 10c Strategic Flood Risk Assessment

The Draft Plan includes proposals to make additions, deletions and modifications to **Volume 4-Record of Protected Structures** and in accordance with Section 12 (3) of the Planning Act, the Planning Authority shall serve on each person who is the owner or occupier of the proposed protected structure or the protected structure, as the case may be, a notice of the proposed addition, deletion or modification including the particulars.

Public Consultation

A copy of the Draft Clare County Development Plan 2023-2029 with associated Environmental Report and Natura Impact Report will be on public display on **10th December, 2021 to 28th March 2022** and will be available to view online at https://clarecdp2023-2029.clarecoco.ie/stage2-draft/display/ and may also be inspected during normal opening hours at the following locations:

- Áras Contae an Chláir, New Road, Ennis.
- Shannon Municipal District Office, Town Hall, Shannon.
- West Clare Municipal District Office, Town Hall, The Square, Kilrush.
- Ennistymon Area Office, Ennis Road, Ennistymon.
- Killaloe Municipal District Office, Mountshannon Road, Scarriff and
- At all public libraries in County Clare during opening hours.

Copies of the Draft Clare County Development Plan 2023-2029 are also available for purchase from the Planning Department.

Public consultation events on the Draft Clare County Development Plan 2023-2029 will take place throughout the County as follows, subject to Covid-19 guidance in place at the time:

VENUE	DATE	TIME
Lisdoonvarna Pavillion, Lisdoonvarna	Tuesday 25th January 2022	4.00 - 8.00pm
Scouts Hall (beside Ennis Parish Office), Station Road, Ennis	Wedneday 26th January 2022	4.00 - 8.00pm
Clonlara Community Sports & Leisure Centre, Clonlara	Thursday 27th January 2022	4.00 - 8.00pm
Kilkee Community Hall, Kilkee	Tuesday 1st February 2022	4.00 - 8.00pm
Killaloe Hotel & Spa, Killaloe	Wednesday 2nd February 2022	4.00 - 8.00pm
Clarecastle Community Hall, Clarecastle	Thursday 3rd February 2022	4.00 - 8.00pm
Kilmihil Community Hall, Kilmihil	Tuesday 8th February 2022	4.00 - 8.00pm
Tulla Cultural Centre, Tulla	Wednesday 9th February 2022	4.00 - 8.00pm
Newmarket on Fergus Community Hall, Newmarket on Fergus	Thursday 10th February 2022	4.00 - 8.00pm

Submission/Observations

Clare County Council hereby invites any interested parties to make submissions or observations with regard to the Draft Clare County Development Plan 2023–2029. Submissions/observations may be made during the period from 10th of December 2021 to 4pm on 28th of March 2022 inclusive. Submissions received will be taken into consideration before the making of the Clare County Development Plan 2023-2029.

In respect of making a submission or observation please note the following:

- Please insert the heading "Draft Clare Draft Development Plan 2023-2029" on your submission
- Please make your submission by one medium **only** i.e. via on-line form, email or by post. This will avoid the duplication of submission reference numbers and will streamline the process.
- Submissions/observations should include your name and may include address, a map (for identification purposes) and, where relevant, details of any organisation, community group or company etc., which you represent. Clare County Council is subject to the provisions of the Data Protection Act (as amended) and General Data Protection Regulation (GDPR). In order to assist us in complying with Data Protection and GDPR please include your name and contact details (and where relevant, details of any organisation, community group or company etc., which you represent), on a separate sheet to the content of your submission/ observation. This processing of your personal data is lawful under Article 6 (1)(e) of the GDPR regulations. The Council's Data Protection Policy is available on the Council website.
- Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing.
- Please be advised that all submissions received will be published online in accordance with the requirements of the Planning and Development Act 2000, as amended, and will be summarised in the Chief Executive's Report, which will be published. You should ensure that no vexatious, libellous or confidential information, including confidential information relating to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure) is included in your submission. The Planning Authority reserves the right to redact any submission or part thereof that does not comply with this requirement.

  The planning process is an open and public process and therefore your submission (in part or in total) will be available to view online at https://clarecdp2023-2029.clarecoco.ie/. All observations or submissions received during the above time period will be taken into consideration before the making of the Clare County Development 2023-2029.

A submission/observation can be submitted by one of the following methods:

- Online: https://clarecdp2023-2029.clarecoco.ie/make-a-submission/
- In writing to: Draft Clare County Development Plan 2023-2029, Planning Department, Clare County Council, New Road, Ennis, Co Clare. V95 DXP2
- By email to: devplan@clarecoco.ie. Subject headline should read "Submission to Draft Clare County Development Plan 2023-2029"

The deadline for receipt of submissions/observations is 4pm on Monday 28th March 2022. Please note late submissions will not be considered.

If you have any queries or require more detail, please contact the Forward Planning Section by email at: forwardplan@clarecoco.ie or by phone at 065-6846407/6846451.

Liam Conneally, Director of Service,
Economic Development

10th December 2021



COMHAIRLE CONTAE AN CHLÁIR | CLARE COUNTY COUNCIL

Áras Contae an Chláir
New Road, Ennis
County Clare V95 DXP2
www.clarecoco.ie