

HRA PLANNING
Chartered Town Planning Consultants

Submission on
Draft Clare Development Plan 2023 - 2029

On behalf of:
Bunratty Acquisitions Limited

March 2022



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1.0 INTRODUCTION

HRA PLANNING has been retained by Bunratty Acquisitions Limited (our client) to prepare this submission to Clare County Council in respect of the Draft Clare Development Plan 2023 – 2029 (Draft Plan).

Our client owns 8.9 hectares of land in the centre of Bunratty village currently zoned for a mixture of residential, commercial, agricultural and open space uses, including:

- Residential – 2.3 hectares (planning permission secured for 41 no. dwellings (P19/939))
- Commercial – 2.3 hectares
- Agricultural – 1.4 hectares
- Open Space – 2.3 hectares

This submission seeks a change to the zoning afforded to the land, including the following:

- Change 1.6 hectares of land from agricultural use to residential use
- Change 2.7 hectares of commercial zoned land to mixed use zoning

The request to change the zoning provisions in the Draft Plan are based on the following material considerations:

- a. Need to reconsider the core strategy and housing unit allocation for Bunratty having regard to quantum of housing already permitted in the village and the demand for such housing;
- b. The need to plan for compact growth and the unsuitable nature of other zoned residential land having regard to capacity of road network and the biodiversity qualities of the land;
- c. The emergence of sustainability and walkability as important factors in community development which has led to a resurgence of mixed-used zoning; and
- d. Compliance with SPPR DPG 7 of the Draft Development Plan Guidelines which mandates planning authorities to adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.

2.0 BACKGROUND & CONTEXT

2.1 Location & Characteristics of Site

Although agricultural in nature, Bunratty is under substantial urban pressures for housing. Located between Shannon Town and Limerick City, the settlement is largely a tourist village.

Although small, the village is dominated by the large Bunratty Castle tourism complex, with a number of large hotels in the vicinity. The settlement is largely clustered around the junction of a few minor roads. Many of the houses are in part use as Guesthouse establishments. According to the Census of Population 2016, the village has a population of 349 persons.

The Draft Clare Development Plan 2023 – 2029 (CDP) confirms that Bunratty, in addition to being a major tourist hub, is an important residential settlement. Residential development is predominantly low density in character nestled amongst extensive mature trees and a high-quality public realm. The centre of the village has recently been enhanced with new road surfacing, delineation, signage, lighting, and landscaping.

Bunratty provides significant employment to the surrounding area notwithstanding its relatively small size as a village. Employers such as Roadstone, Bunratty Folk Park, Meadows & Byrne, Bunratty Castle Hotel, Durty Nellys, Bunratty Winery and other employers provide employment in the village for circa 234 people full time and 184 people part time¹.


The subject site comprising 8.9 hectares is appropriately located in the centre of the village, as detailed in Figure 1.0. The site is bound to the south by the N18/M18 dual carriageway, to the North by two residential developments, Dun Ri and Cluan Raite, to the west by a road accessing the off ramp to the N18 and to the east by the Bunratty Castle Hotel and a graveyard.

The village has a number of services and facilities including a Spar Express convenience shop, petrol filling station, a number of restaurants and cafes, bars and the significant tourist attraction that is Bunratty Castle and Folk Park. A large Roadstone Quarry adjoins the village to the north west. There are also a number of local sporting clubs and associations with the neighbouring settlement of Cratloe. The closest primary school to the settlement is a rural school located in Clonmoney some 4km north west of Bunratty Village. Cratloe National School is also located within proximity of the settlement some 5.3km east of the settlement.

The village is well connected to larger settlements. Bus Eireann and Dublin Coach provide hourly services to the village with connections to Ennis, Shannon, Limerick City and the University of Limerick.

¹ ¹ Source: Survey undertaken by applicant for the specific purpose of this submission



 Extent of Landholding



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Figure 1.0 Location of the Subject Site

2.2 Planning History

Planning permission was recently granted following a third party appeal to An Bord Pleanála against the decision to grant permission by Clare County Council for the construction of 41 no. residential units (P19/939) on part of the subject land already zoned for residential use. The development comprises an attractive 'village style' development, appropriate in scale and form to its surrounding environment with a focus on enhanced urban design and quality public realm, providing effective pedestrian and cycle connections back into the village core via the existing graveyard and established pathway.

The development as permitted demonstrates how further development on the subject land could be facilitated in a sympathetic manner, commensurate with the surrounding built form, but yet have regard to the requirements to delivery compact and sustainable growth.

3.0 NEED FOR A REVISED APPROACH IN THE DRAFT DEVELOPMENT PLAN

The site comprising 8.9 hectares is proposed to be zoned for different uses in the Draft CDP, as detailed in Figure 2.0 and described hereunder

- Residential R2 land – 2.3 hectares (planning permission secured for 41 no. dwellings (P19/939)
- Commercial COM1 land– 2.3 hectares
- Agricultural AG1 land – 1.4 hectares
- Open Space – 2.3 hectares

The Core Strategy as set out in the Draft CDP identifies that the settlement of Bunratty will grow by 79 no. persons between 2023 and 2029, or that 41 no. residential units shall be permitted within this time period. To facilitate this growth, the Draft CDP identifies two distinct areas of residential zoned land including R1 and R2 land. The R1 residential zoned land comprises part of the subject site and already has the benefit of planning permission for 41 no. units. Development on this land is due to commence in the short term with an estimated construction programme of 18 months and therefore is likely to be significantly advanced by the time the Draft CDP is adopted. In accordance with the guidance (Section 4.4.1) provided in the Draft Development Plan Guidelines 2021 a site with a planning permission that has commenced and is almost fully built-out can be wholly excluded from the core strategy

This means that in reality, only 1 no. site will be identified for residential development in the village. This site, namely R2, will be the sole site identified to deliver most of the housing in the village over the plan period between 2023 – 2029, save for 12 no. units which are anticipated to be delivered via brownfield, infill schemes.

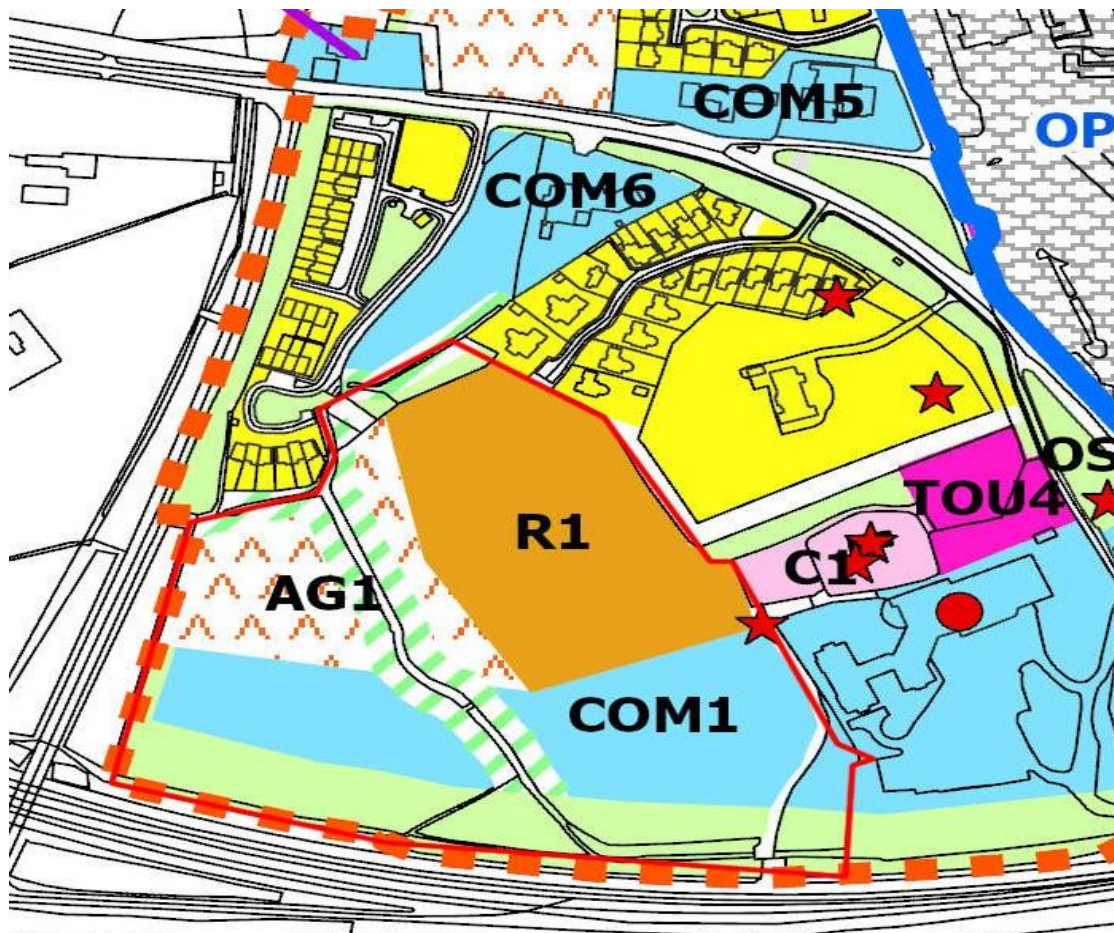


Figure 2.0 Proposed Draft Plan Zonings Afforded to Subject Land

Identification of just one site, R2, for residential development over the plan period, between 2023 and 2029, creates the potential for market monopoly whereby the delivery of housing in the village is dependent on one landowner and in particular is dependent on the release and advancement of such land for residential development. In this regard, it is noted that the land identified R2 was previously zoned for residential development in the 2017 Plan and was never advanced as a planning application / for development purposes.

The Draft Development Plan Guidelines 2021 recognises that there is a need for some degree of competition and choice in the residential development land market. In this regard it is submitted that the supply of residential zoned land in the village needs to be reconsidered to provide for market choice and to diversify future delivery over the plan period 2023 – 2029.

The quantum of housing units afforded to Bunratty in the core strategy must also be reconsidered having regard to the fact that the allocated quantum shall only permit 7 no. units per year to be constructed over the six year plan period.

4.0 EXISTING PLANNING POLICY PROVISIONS

The Draft Development Plan is being prepared within a framework of national and regional policy, all of which influences the development approach adopted for villages such as Bunratty. Such national and regional policy also influences the extent and intensity of development envisaged for villages, against a backdrop of revitalisation and regeneration.

4.1 National Planning Framework (NPF)

The NPF seeks to focus growth on cities, towns and villages with an overall aim of achieving higher densities than have been achieved to date. National Strategic Outcome 1 Compact Growth states that "From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people. Combined with a focus on infill development, integrated transport and promoting regeneration and revitalisation of urban areas, pursuing a compact growth policy at national, regional and local level will secure a more sustainable future for our settlements and for our communities.....".

The various policies in the NPF are structured under National Policy Objectives (NPOs). Relevant National Policy Objectives include-

- NPO3c- Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints¹ .
- NPO6- Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.
- NPO11- In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.
- NPO16- Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.
- NPO35- Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Other relevant sections include Section 2.6 Securing Compact and Sustainable Growth which states "An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village, has the potential to make a transformational difference. It can bring new life and footfall, contribute to the viability of services, shops and public transport, increase housing supply and enable more people to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less".

In Section 5.3 Planning for the Future Growth and Development of Rural Areas, it is noted that the Central Statistics Office (CSO) defines rural as the areas outside settlements with a population of 1,500 or more people. This includes smaller settlements of fewer than 1,500 people, home to around 20% of the population of rural areas, and individual dwellings in the countryside, which together comprised approximately 37% of the population in 2016. This reflects Ireland's historic rural and village settlement pattern.....

4.2 Regional Spatial Economic Strategy (RSES)

The strategy for the Southern Region as set out in the RSES is to build a strong, resilient, sustainable region with eleven 'Statements of the Strategy' identified including Compact Growth. Strengthening and growing our cities and metropolitan areas; harnessing the combined strength of our three cities as a counterbalance to the Greater Dublin Area, through quality development; regeneration and compact growth; building on the strong network of towns and supporting our villages and rural areas. The Strategy focuses on 'Key enablers' including 'Revitalising Rural Areas' through readapting our small towns and villages and increasing collaboration between networks of settlements to seek higher value, diversified jobs for a higher quality of life.

The RSES has built on these principles and has included an objective to promote the "10-minute" town concept, whereby community facilities and services are accessible within short walking timeframe

Table 3.2 of the RSES identifies settlement types and categories and identifies Cities Metropolitan Areas as the top tier in the table. The attributes of Metropolitan Areas are "accessible with national and international connectivity, strong business core, innovation, education, retail, health and cultural role." Limerick - Shannon is identified as a Metropolitan Areas with policy levels listed as NPF, RSES, MASP, Development Plans and Local Area Plans. The MASP area is almost evenly split, with 49% located in Co. Clare and 51% in the City and County of Limerick. Bunratty with an identified population of 349 persons is located within the MASP. This MASP provides a focus on Limerick City and the Metropolitan settlement of Shannon. It sets out the framework for Limerick City and County Council and Clare County Council and the various stakeholders to implement the NPF within the context of the RSES.

In Section 5.0, the RSES recognises that the NPF acknowledges that there is a need for more proportionate and tailored approaches to residential development. This means that it is necessary to adapt the scale, design and layout of housing in towns and villages, to ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village.

4.3 Draft Clare Development Plan 2023 – 2029

The Draft CDP recognises the importance of the tourism industry to Bunratty, which is evident in the extent of land zoned for tourism development. The Draft CDP states that the Castle and Folk Park have opened up trade and employment opportunities for hotels and local businesses, giving rise to a small, but thriving commercial centre based on the tourism industry. There are also numerous tourism-based businesses including Blarney Woollen Mills and Meadows and Byrne, together with public houses, hotels and bed and breakfast establishments. In addition to being a major tourist hub, the Draft CDP recognizes Bunratty is an important residential settlement in south Clare situated approximately 5.7km southeast of Shannon and approximately 9km from the Clare/Limerick border. Residential development is predominantly low density in character nestled amongst extensive mature trees and a high quality public realm.

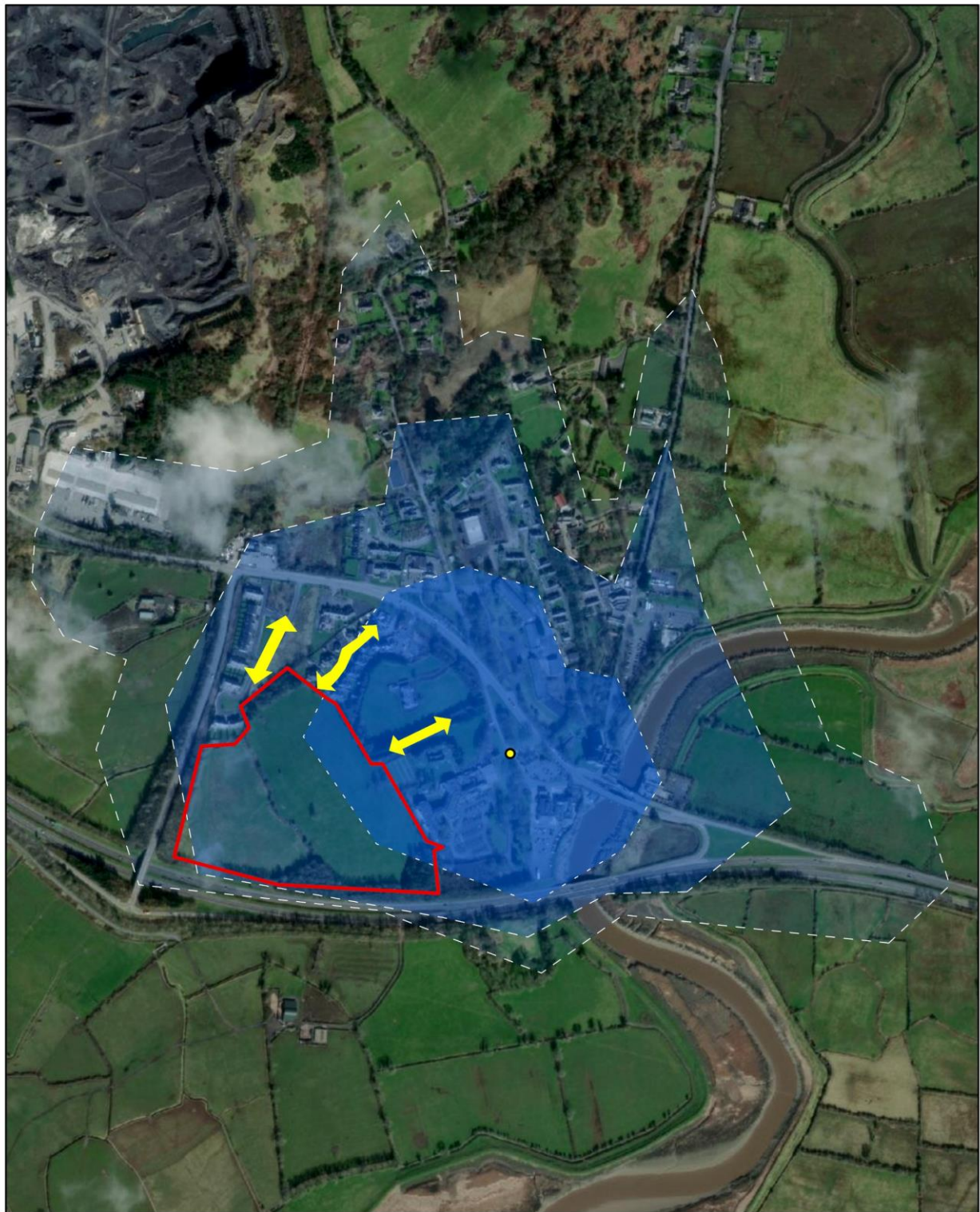
However, notwithstanding recognition of the importance of its residential settlement function, the Draft CDP has only zoned 4.2 hectares of residential zoned land in contrast to the 35.4 hectares of undeveloped land zoned for tourism purposes and the 9 hectares zoned for commercial purposes. It is submitted that such imbalances in zoning provision will not lead to sustainable tourism development and will not provide the necessary homes for workers engaged in the tourism sector. Such an approach will facilitate a large transient population only and will fail to provide for a resident population within the village.

- It is thus submitted to the planning authority that a better balance needs to be struck in the zoning of land in Bunratty such that the extent of residential and community zoning is more proportionate to the tourism and commercial zoning currently proposed in the Draft Plan. The resident population must be increased in the village as a balance to the temporary tourist population, which is likely to further grow as Bunratty Castle further develops.

5.0 DEVELOPMENT TYPE & SUITABILITY

The subject site is located within a 5 minute walk of the village core, defined as that area located around Meadows & Byrne, adjoining bars and restaurants and the cemetery as detailed in Figure 3.0. The subject land can therefore be comprehensively development in support of the “10-minute” town concept, whereby community facilities and services are accessible within a short walking timeframe.

The subject lands are effectively connected to the centre of the village via a dedicated pedestrian pathway at the south eastern corner of the site adjoining the graveyard in the village and through the existing Dun Ri residential development. Vehicular access is facilitated via an access road adjoining the Cluan Raite residential development to the north.



- | | |
|---|--|
|  Extent of Landholding |  Village Centre |
|  Connection Routes |  2 Minutes |
| |  5 Minutes |
| |  10 Minutes |



Figure 3.0 Land within a Walk-time Catchment of the Village Core

Given the difference in site levels between the adjoining commercial development to the east (Bunratty Castle Hotel) and that part of the subject site currently zoned for commercial use (COM1), a natural access between both extents of zoned land will not be possible. Rather, it will be necessary to utilise the permitted access route adjoining the Cluan Raite residential development to the north to access all commercial zoned land within the landholding. This will result in the movement of commercial traffic through a permitted residential scheme, which is less than desirable. Further, the difference in site levels is likely to result in a disconnected commercial core, with vehicular movement between the Bunratty Castle Hotel site and the subject lands restricted because of the level difference.

The location of the land adjacent to the core of Bunratty provides an opportunity to promote synergies enabled through the delivery of mixed-use development, including residential, employment and commercial uses. In this respect a mixed-use zoning is sought for the land currently zoned for commercial purposes (COM1), whilst additional residential use is sought for that land currently zoned for agricultural purposes (AGR1), whilst maintaining the proposed 15m otter habitat buffer zone from the Urlan Beg Stream as set out in the Draft Plan.

It is noted that a mixed-use zoning has been afforded to Opportunity Site OP1 in the village. A similar zoning is required for that part of the subject lands currently zoned COM1.

The emergence of sustainability and walkability as important factors in community development has led to a resurgence of mixed-used zoning. Today, much commercial development is environmentally benign, and there are often advantages to locating different uses in close proximity. A mixed-use zoning can be used as a vehicle for revitalising struggling areas and spurring economic development. Further it can be used to create a definitive village centre in Bunratty including:

- Promoting a village-style mix of retail, restaurants, offices, community uses, and multifamily housing as opposed to solely commercial development;
- Ensuring greater flexibility in an ever changing and dynamic market;
- Facilitating a walkable community with complementary uses of buildings beside each other; and
- Creating a cohesive, yet diverse, neighbourhood with increased economic and cultural opportunities, contributing to greater liveability and a healthier local economy

As acknowledged in the Draft CDP, the aim is to promote flexible policies and objectives which are responsive to economic change, opportunities for job creation, investment, advances in technology and changing work practices². It is submitted that a mixed-use zoning would afford such flexibility particularly in a small village like Bunratty, which is significantly dependent on the tourism market.

² Chapter 6.0 Draft Clare Development Plan pp.123

The mixed-use zoning on 2.3 hectares of land (currently zoned for COM 1), is sought subject to:

- Preparation of an overall phased masterplan for the land which will guide future development extents and use;
- Provision of a mix of uses, including residential, commercial, employment and community uses;
- Maintenance of an open space / amenity zoning along the Urlan Beg Stream to protect the otter population;
- Maintenance of a green buffer along the N18 as represented in the existing Draft Plan; and
- Provision of dedicated community facilities, including open space to be agreed with the planning authority.

The residential zoning on 1.4 hectares of land (currently zoned for AG 1) will compensate for some of the loss arising from the R1 land which has the benefit of planning permission and will be developed in the short term. Development on this land shall follow the village centric principles already promoted and permitted in the recent grant of permission secured from An Bord Pleanála under planning permission P19/939. With a focus on walking and cycling the housing is intended for permanent occupation focused on the family market.

6.0 SEQUENTIAL APPROACH TO DEVELOPMENT

The recently published Draft Development Plan Guidelines clearly state that *"planning authorities should approach the development plan with a clear focus on the delivery of expected development outcomes"*. In this regard the planning authority should note that the owners of the land are intent on developing the subject lands in accordance with the planning permission recently secured for residential development. This intent will deliver development outcomes on the subject land.

The NPF strategy incorporates National Strategic Objectives which seek to tackle the damaging and inefficient pattern of urban sprawl through favouring compact forms of development that focus on consolidating the footprint of our existing settlements with new development. The location of zoned lands and sites within the settlement must be consistent with sequential development patterns, town centre first principles, proximity to services and facilities and the need to reduce carbon emissions.

SPPR DPG 7 of the Draft Development Plan Guidelines states that,

"Planning authorities shall adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently".

The lands in the centre of Bunratty village are low lying and therefore more suited to development than other lands removed from the village core, which rise steeply to the north and northwest, where there are extensive views of the estuary. There are only two plots of land zoned for residential purposes in Bunratty, namely R1 & R2. R1 comprises part of the subject land. The R2 land is further removed from the village core, situated to the north of the settlement in an elevated position, with access off the narrow and poorly aligned Hill Road. Further, the R2 land comprises significant tree stands which visually define the northern elevated lands of the village.

The R1 lands and adjoining land for which residential zoning is sought, are more spatially centrally located in contrast to the R2 lands which are more spatially peripherally located. It is thus submitted that the lands adjoining R1, currently zoned for agricultural purposes, should be prioritised for development first, with R2 lands being zoned subsequently, all in accordance with the sequential approach to development.

7.0 THE REQUEST

The subject land is centrally located on low lying land adjoining the village core and existing commercial development. The site has excellent permeability with excellent pedestrian connectivity.

It is requested that the planning authority changes the land use zoning in respect of the subject land as detailed in Figure 4.0, such that:

- 1.6 hectares of land is changed from agricultural use to residential use; and
- 2.7 hectares of land is changed from commercial zoned land to mixed use zoning

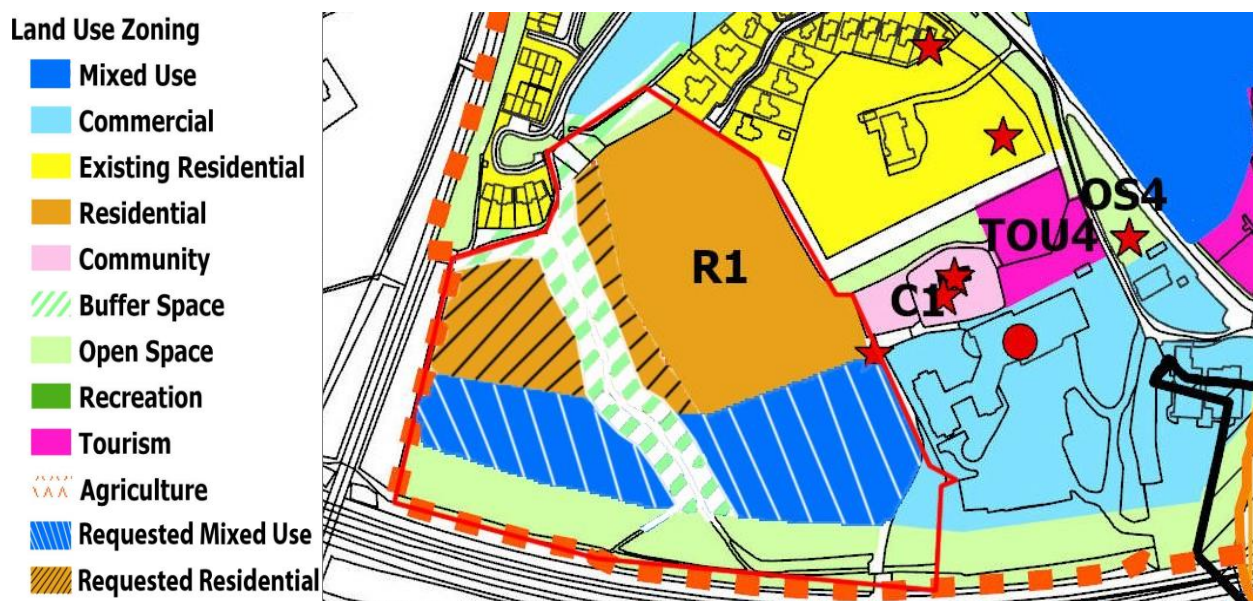


Figure 4.0 Requested Zoning