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Clare County Council

Kilkee, Loop Head Peninsula, Co. Clare

Submission ref: S2-223

Forward Planning Section

Clare County Council

New Road

Ennis

Co. Clare

22nd March 2022

I would like to make the following submission/observations to the Draft Clare County Development Plan 2023-2029 (CDP)

Core Strategy:

- I would like to have the following observation on the record; 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Framework (NPF) and Regional Spatial and Economic Strategy (RSES) should be considered to be fundamentally flawed and out of date policy documents. I also believe there is a case to be made that the policy direction that underpins *Our Rural Future: Rural Development Policy 2014-2022* and the recently released *Town Centre First Policy* provides a contradiction to both the NPF and RSES. I understand the forward planning section have little choice other than to adhere to existing policy documents, but this contradiction will lead to confusion for communities and agencies over the lifetime of this county development plan.

Traveller Accommodation: 5.2.8

- That a specific objective is included with reference to undertaking 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.

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Economic Development and Enterprise

Strategic Aims 6.1

- To 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...’*
- I would also suggest there should be a specific aim included here that seeks to *‘diversify the economies of those coastal communities who have an unsustainable reliance on tourism as the principle economic driver.’*

The Food Industry 6.22

- That this segment be amended 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.
- That two extra specific objectives be included under CDP 6.21, or extra stand alone objectives be created, *“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.”*

Tourism Development 6.27

- To 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”*

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Retail

Tourism related Retail Development 7.5.3

- That CDP 7.19 be amended 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. The wording of CDP 7.19 should be amended to *“prioritise the delivery of new sustainable tourism related developments and initiatives, of appropriate scale, within existing settlements proximate to established attractions”*

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Rural Development & Natural Resources

Strategic Aims 8.1

- That specific reference is made to the adoption of, and reference to, the Town Centre First Policy as a specific focus for all future rural developments under the 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.

Economic Development in Rural Areas 8.2.2

- To add in a specific reference to the adoption of, and reference to, the Town Centre First Policy for any rural economic developments under CDP 8.1

Rural Transport 8.2.7

- To 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

Strategic aims 9.1

- To 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.

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Tourism Promotion 9.2.1

- That 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*”.

Integrated Tourism Products 9.2.2

- To 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.***

Tourism Developments and Tourist Facilities 9.2.3

- To 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.
- To either insert wording in CDP 9.4(d) or to 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

Visitor Accommodation 9.2.4

- To 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*

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Rural Future: Rural Development Policy 2014-2022' and the 'Town Centre First Policy'.

Sustainable and Responsible Tourism 9.2.18

- To 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.”*

Tourism in North Clare and the Burren 9.3.4

- To 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.”*

Tourism in West Clare 9.3.5

- To insert into CDP 9.25 the following objectives
- *“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

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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”.

Sustainable Communities

Strategic Aims 10.1

- To insert a specific and delivery focussed reference to the aims of the Town Centre First Policy as a standalone strategic aim for sustainable communities.
- To also include reference to sustainable and diversified economic drivers in communities.

Sustainable and Inclusive Communities 10.2

- To 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.

Social and Community Engagement 10.4

- To 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

- To 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.

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Ports, Jetties, Harbours, Quays and Piers 11.2.14

- To 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

- To add the following objective under CDP 11.47; “ To prioritise the development of community owned energy developments”
And to consider rewording 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 I don’t believe we should have such strongly worded support for these projects in our County Development 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, I propose 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

Promoting and Protecting Biodiversity and Wildlife Corridors 15.2.10

- To 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.

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Architectural, Archaeological and Cultural Heritage

Oidhreacht Theanga: Linguistic Heritage 16.5.3

- 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

Strategic Aims 17.1

- To 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.
- To 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.

Town and Village Centre Vibrancy 17.2.2

- 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 this opportunities it presents, the objective in CDP 17.1 could be strengthened; *“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”*.

Town and Village Improvement Strategies 17.2.3

- Include as an objective the updating of *‘Towards a Better Kilkee...’* before the end of the current strategy.

Town Teams 17.2.4

- 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

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Addressing Depopulation 17.2.8

- 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. I believe this objective needs to be far more forceful in it's wording to provide the relevant policy backup for the local authority in addressing the issue.

Design and Placemaking

Universal Design 18.3.6

- That reference to "Changing Places' facilities be included in CDP 18.4

Appendix 2 Indicative Land Use Zoning Matrix

- To change 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; of course, there are legacy sites that will continue to operate as usual, but we shouldn't 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 waste water treatment, where permitting this type of development on residential zoned land reduces the capacity for permanent dwellings to be permitted.

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Clare Renewable Energy Strategy

Vision

- To include reference to balancing community impact with economic development in the vision statement. While there is reference to balanced social and economic development I feel 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.

Strategic Aims 1.1

- To 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.”*
- To add in a further strategic aim; *“to prioritise the development of community owned renewable energy projects”*

County Clare Energy Needs 3.2

- With regards 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.

RES Objective 4.1

- I would like to see reference to a stronger commitment to protecting existing residential amenities in the drive to facilitate the achievement of our renewable energy targets.

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West Clare Municipal District Settlement Plans

Kilkee

General Objectives

- To insert a commitment to update to the strategic document “Towards a Better Kilkee” in advance of its expiry date of 2024.