

Leahy Planning Ltd.

Mill Road House, Mill Road, Ennis, Co. Clare, V95 FH5N.

Tel No: 065-68 91254

Mobile: 087-795 8180

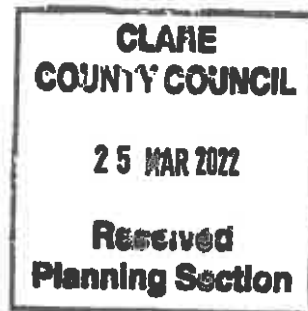
CRO No: 623263

Email address: info@leahyplanning.com

Website: www.leahyplanning.com

Michael Leahy B.Arch., M.R.U.P., Dip Plng. & Env. Law, F.R.I.A.I., M.I.P.I., A.oU.

Planning Department
Clare County Council
New Road
Ennis
County Clare



24th March 2022

RE: Submission proposed revisions to development plan 2023 to 2029.

Shannon municipal District, Local Area Plan for Sixmilebridge.

Request to provide for zoning of lands.

Dear Sir/Madame,

On behalf of my client Mr Liam Nolan of [REDACTED]

[REDACTED] we wish to make a submission in respect of the proposed revisions to the development plan. The area of land belonging to my clients is outlined in blue on the attached map at figure 1.

While Sixmilebridge is classed as a "Small Town" under the proposed new development plan, it is evident that the town has experienced very substantial growth over the past 10 years. It is a highly desirable location being strategically positioned proximate to the hub town of Ennis and the

Metropolitan area of Shannon/Limerick. It has the substantial range of facilities which a larger town enjoys including a railway station, a secondary school, medical and other professional services, church and active recreational facilities.

The site the subject of this submission is located in the southern section of the town. As is apparent from the Local Area Plan map, the existing railway line has to an extent formed the southern boundary of the town, but unusually this is stepped in, in terms of the delineation of the settlement boundary to exclude my client's site.

Looking at the map as indicated in figure 1, there does not appear to be any logical reason why the area of my client's land has been excluded from the proposed settlement boundary. It is directly across the road from lands which have been included in the plan zoning, it is north of the boundary formed by the railway line, and indeed it is at a closer walking distance to the central part of the town than other areas to the north of the settlement area which have been zoned.

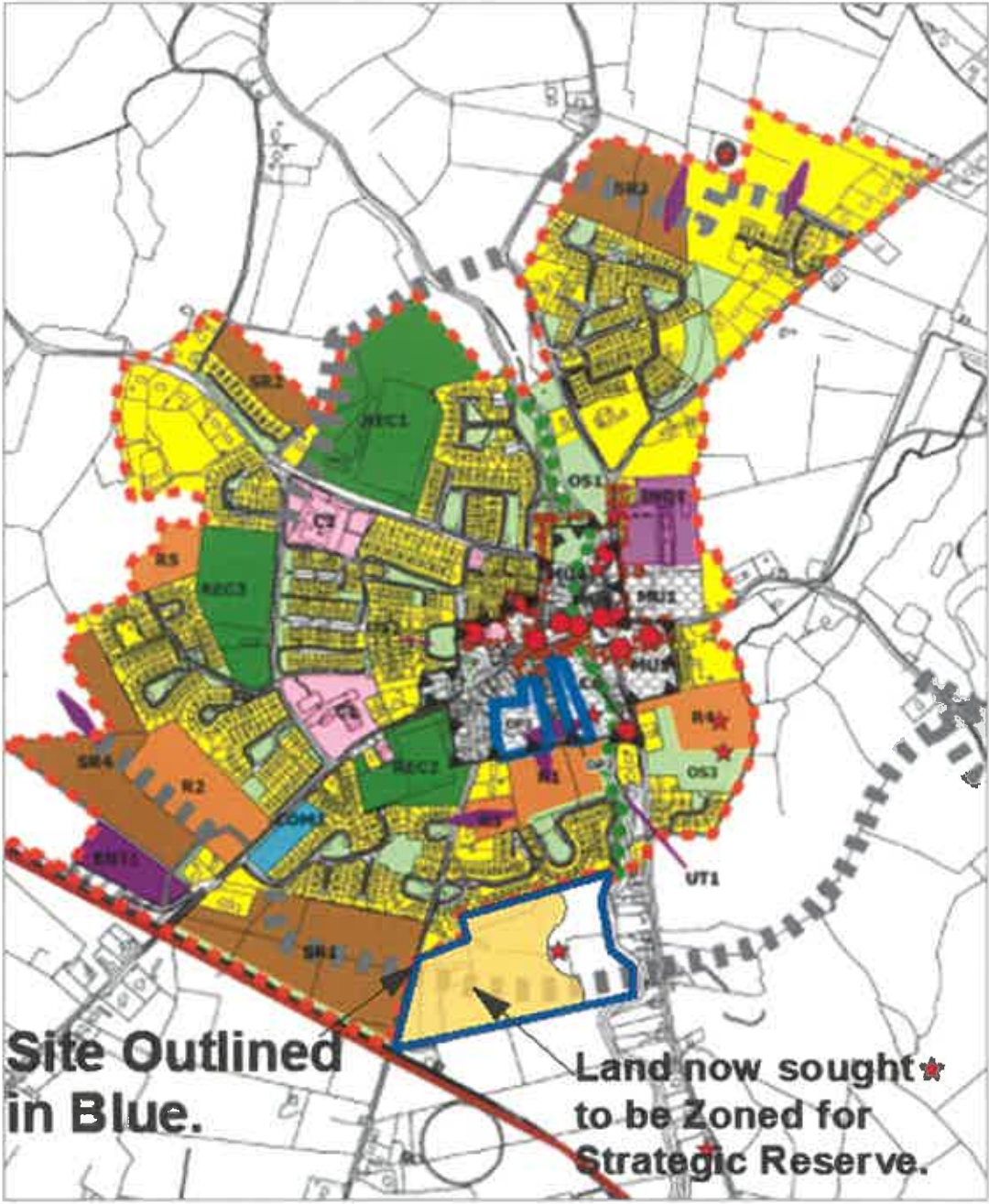


Fig 1. Extract from proposed revision to Development Plan with site shown outlined in Blue and proposed re-zoning area indicated.

Core Strategy.

The proposed Core Strategy requirement is for 186 houses. Even at a very high density of 35 per hectare this translates as some 5.3 ha with a total of 6.3 ha proposed be zoned for housing. The council may argue that only a limited freeboard is necessary given the possibility of 30% of residential units being contained within the existing built-up area. The reality is however that it will be very difficult to ensure that 30% of 186 houses (56 houses), will be built within the existing central built-up area of Sixmilebridge. The bulk of existing older houses within the town centre are not suitable for conversion to apartments over existing commercial use, and there is likely to be a continued pressure for commercial space in the town as the population continues to grow.

We would therefore argue that a substantial case can be made that insufficient land has been provided for under the Core Strategy. Even if all of the zoned land comes to be available and if a lesser figure than the 56 houses is built within the central area (let us say 25 units), then in reality the entirety of the zoned land would have to be developed at quite high densities, of the order of 30 houses per hectare, to achieve the core strategy targets.

All of zoned land rarely comes available within the lifetime of a Development Plan, and this may be for a variety of reasons including reasons of title, the individual circumstances of landowners, difficulties of finance et cetera.

In the context of the proposed zoning of Sixmilebridge we would also point out that some of the sites which have been zoned for residential appear to be small in extent and not attractive to developers.

One of the difficulties in regard to the entire Core Strategy process, is that while it seeks to identify the appropriate **quantity** of land for zoning in an area based on the ratio between preferred densities and population growth projections, it does not seek to investigate the suitability of each site, or indeed the likelihood that it will become available for development. This represents a particular difficulty in the case of smaller towns and villages. In a large urban situation, where a large area of land is zoned for a particular use and where a reasonable freeboard is included, it is likely that sufficient land will be brought forward for development within the lifetime of a plan.

However, in a smaller town, where only a small amount of land is so zoned, the failure of even one parcel of land to come forward for development can have a significant negative impact on the implementation of the plan. We believe that this may be a danger the case of Sixmilebridge, and that a failure to zone a greater amount of land or to carry out a detailed examination as to the suitability of each zoned site, may result in a failure to enable sufficient land to be brought forward for development, and this may result in inadequate provision for housing at a time of severe housing shortage.

We also note the requirement of **paragraph 3.4.1** of the Core Strategy which, having regard to *Sustainable Residential Development in Urban Areas 2009 (Cities, Towns and Villages)*, and circular letter NRUP 02/2021, indicate that provision should be made for low-density development which does not represent more than 20% of the total planned housing stock. We would suggest that Sixmilebridge is an ideal location for the provision of a certain

quantum of low-density housing, but the proposed development plan does not make provision for this.

This 20% figure equates to some 37 houses in the case of Sixmilebridge which, given the low-density range of 10 houses per hectare, would suggest that some 4 ha should be made available for this type of housing. We would suggest therefore that it is very important that at least some of the lands indicated as strategic reserve, including the land the subject of this submission, should have an allowance for the provision of some element of low-density housing.

We also wish to point out that even though permissions have been granted in Sixmilebridge over the past 5 years, the total number of houses which have been built within the 5 year period of the last plan does not exceed 50 houses. This despite the fact that the core strategy allocation for Sixmilebridge contained in the last plan was for 136 houses.

Is it not time to urgently examine whether the Core strategy system is working, and to ask whether it in fact impedes rather than facilitates the delivery of housing?

Section 28 guidelines.

Guidelines issued under Section 28 of the Planning Act are mandatory for local authorities to follow so it is important to examine them to ensure that government policy is being followed in the local area plans.

The principal document issued under Section 28 of the Planning Act dealing with the design of smaller towns and villages is ***Sustainable Residential Development in Urban Areas, 2009***, issued by the Department of the Environment, and in particular Chapter 6 of that document.

Chapter 6 sets out a number of key policy advices in respect of the development of smaller towns, and three of these are of particular relevance in the present case:

- That new development should contribute to compact towns, (paragraph 6.3.(a))
- That new development should offer alternatives to urban generated rural housing, (Paragraph 6.3(d)) and
- That the scale of new residential schemes for development should be in proportion to the pattern and grain of existing development Paragraph 6.3.(e)).

In regard to the development of compact towns we point out that recent government emphasis has been on the creation of the “10-minute town” concept whereby services are located within a 10-minute cycle or walk from residential areas and whereby such an arrangement can significantly reduce car dependency.

This is now a widely accepted concept in urban development. In the context of smaller towns, it is evident that perhaps a smaller or shorter walk distance would be more appropriate. A five-minute walk distance represents a distance of some 540 m at a pace of 1.8 m/s which is the normal walking speed of 2

paces per second of most people. Even reducing this to a 500 m walk distance indicates that the site of this submission is within that 5-minute radius.



Figure 2.
Google Map Extract showing walk distance from frontage of site to Town Centre.

It is also of note that many parts of Sixmilebridge which have been zoned for development are outside of this walk distance and we would consider it appropriate therefore that the site of this submission should be included in the zoned areas. We also point out that the road connection along Rossmanagher Road is now at an urban standard with footpaths on both sides to a point within 100 m of the frontage of the site the subject of this submission.

In regard to the provision of an alternative to urban generated rural housing in the County generally, we would see that the site is ideal in that it is not town-centre and provision can be made for a certain level of low-density housing as is provided for in the Core Strategy. In fact, we would regard it as something of a lacuna within the proposed Local area plan for Sixmilebridge that no provision has specifically been made for the provision of low-density housing. It is important that land be made available for such housing, more-so in the context of smaller towns and villages than in the larger towns, if the policy outlined in paragraph 3.4.1 of the Core Strategy of the Development Plan is to be met.

In regard to the 3rd policy direction mentioned above, that of ensuring that new residential developments should be in proportion to the pattern and grain of existing villages, again the issue of zoning a certain area of land for lower density is important. The bulk of the housing close to the site of the current submission is developed at lower density, certainly much lower than the currently recommended 35 units per hectare and in this respect, land immediately adjoining these existing housing areas should be similarly zoned.

Relief of infrastructural deficit.

Sixmilebridge is an historic town with a strategic location but a very poor road infrastructure. Major traffic, including substantial forestry traffic, is forced to go through the central part of the town and traverse the very old bridge which gives the town its name. This has led to significant congestion on a regular basis in the town centre, not to mention the danger of causing structural

damage to the bridge. The Local Area Plan indicates a land reserve for the provision of an urgently needed relief road and a substantial portion of this proposed road will pass through the site the subject of this submission. We point out that enabling the granting of planning permission on this site will in turn enable this relief road to be brought forward, as a special development contribution levy can be attached by condition of planning permission on the site to facilitate the construction of this relief road. The provision of this road will also of course make the site more accessible.

The Rossmanagher Road railway bridge immediately to the south of this site, is directly over a sump which at times of heavy rain is incapable of full discharge, with the consequence that the area underneath this railway bridge regularly becomes flooded. The ultimate discharge of this sump is again through the site the subject of this submission into the Ahaclare River. Again, allowing development of the site will facilitate freeing up of this discharge and would relieve a very treacherous flood situation on a main access road. Further photographs showing flooding are attached as Appendix 1.



Extract from Clare Echo showing flooding under Rossmanagher Road railway bridge

It is important in planning for the future of Sixmilebridge that account be taken of the need for relief of significant infrastructural bottlenecks and how zoning can facilitate such reliefs being brought forward without entailing significant expense of the public authority.

Conclusion.

We request that the land the subject of this application be zoned for **Strategic Reserve** but that the development plan should recognise that the site may be considered acceptable for low density housing where other suitable sites for low-density residential do not exist, even if all other residential development sites within the settlement boundary have not been developed.

This would require to be specifically worded in the development plan to make provision for this type of proposal.

We recognise that the area of land to the east of what we have shown as being suitable for rezoning, which is within the floodplain area, should be zoned for open space and are happy that the riverside walkway indicated in the development plan can be extended along the eastern boundary of this land. We believe that the provision of such a walkway would significantly facilitate urban legibility and the accessibility of the proposed site to the town centre.

We trust that you will take this submission into account, and I would be obliged if you could acknowledge receipt of this submission quoting an appropriate reference number to the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Leahy', is written over a horizontal line. The signature is fluid and cursive.

Michael Leahy,

for Leahy Planning Ltd. on behalf of Mr Liam Nolan.

Appendix 1

Photographs showing flooding at Rossmanagher Road railway bridge



