

**HRA PLANNING**  
**Chartered Town Planning Consultants**

Submission on  
Draft Clare Development Plan 2023 - 2029

On behalf of:  
**Leadmore West Partnership**

March 2022



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DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING

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## TABLE of CONTENTS

<b>1.0</b>	<b>INTRODUCTION</b> .....	<b>1</b>
<b>2.0</b>	<b>BACKGROUND</b> .....	<b>1</b>
2.1	Location & Characteristics of Site	
2.2	Planning History	
<b>3.0</b>	<b>NEED FOR A REVISED APPROACH</b> .....	<b>3</b>
3.1	Existing Development Plan	
3.2	Draft Development Plan	
<b>4.0</b>	<b>EXISTING PLANNING POLICY PROVISION</b> .....	<b>5</b>
4.1	National Policy Framework (NPF)	
4.2	Regional Spatial Economic Strategy (RSES)	
<b>5.0</b>	<b>DEVELOPMENT INTENT</b> .....	<b>6</b>
<b>6.0</b>	<b>SEQUENTIAL APPROACH TO DEVELOPMENT</b> .....	<b>7</b>
<b>7.0</b>	<b>THE REQUEST</b> .....	<b>8</b>

## **1.0 INTRODUCTION**

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

Our client has a landholding comprising 2.13 hectares located west of the town centre on the Shanakyle Road, neighbouring the town graveyard. The land straddles the defined settlement boundary, with 0.45 hectares of the land currently zoned for residential purposes in the existing Clare Development Plan 2017 – 2023. The Draft Plan, however, proposes to change both the line of the settlement boundary and the zoning afforded to the land such that all of the landholding in the ownership of our client becomes unzoned.

This submission requests the planning authority to reconsider the change in zoning proposed to the subject land such that the existing residential zoning is reinstated on the land and that an additional 1.68 hectares of land is zoned for residential use, thereby enabling comprehensive development of the entire landholding.

It is submitted that the Draft Plan must recognise that the subject land is fully and immediately serviceable, with a water and sewerage connection available from the adjoining development to the east. The current proposal as put forward in the Draft Plan represents an underutilisation of settlement land and this in itself warrants consideration of appropriate development uses on the subject land commensurate with the established pattern of residential development in the area.

## **2.0 BACKGROUND**

### **2.1 Location & Characteristics of Site**

The subject land is located 820m west of the town centre on the Shanakyle Road, neighboring the existing town graveyard and immediately adjoining recently constructed residential units. The land is undulating, falling towards the public road. Shanakyle Road is currently served with public footpaths and lighting to a point immediately east of the subject land. Refer to Figure 1.0.

Measuring 2.13 hectares in area, the land is defined by existing housing to the east, greenfield land to the north and west and by the Shanakyle Road to the south. The northern extremity of the site is very much brownfield in nature, having previously been used for storage purposes.

Kirush is identified as a 'Service Town' in the Draft Plan, intended to act as an important service centre and as a driver of growth, serving a wide catchment area. With a population of 2,489 persons as per the Census of Population 2016, the Draft Plan envisages the town to grow by 355 persons over the plan period, between 2023 and 2029. Designated as a Heritage Town of Ireland, Kilrush is an attractive place to reside and do business.



-  Landholding
-  Kilrush Town Centre
-  Kilrush Settlement Boundary



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**Figure 1.0** Location of the Subject Lands

## 2.2 Planning History

Outline planning permission was previously granted on part of the subject land in 2010 (planning file reference no.10/05) to construct 6 no. detached units. That part of the landholding granted planning permission adjoined the existing residential development to the east of the site.

This historic permission, although now withered, confirms that residential development on the subject land, must be deemed acceptable in principle.

## 3.0 NEED FOR A REVISED APPROACH

### 3.1 Existing Development Plan

The current Clare County Development Plan 2017 contains the West Clare Municipal District Settlement Plan and zones part of the subject land (0.45 hectares) for residential purposes as detailed in Figure 2.0. The zoning formed part of the overall development of lands identified as R2 and the Council in its Development Plan clearly states that “*the Council favours the completion of the Beal an Inbhir estate*”, which is the estate adjoining the subject lands to the east.

In the current Development Plan, it is stated that,

*“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, open spaces etc.”.*

The settlement of Kilrush is identified as a Service Centre in the existing Development Plan with clear objectives in the Plan,

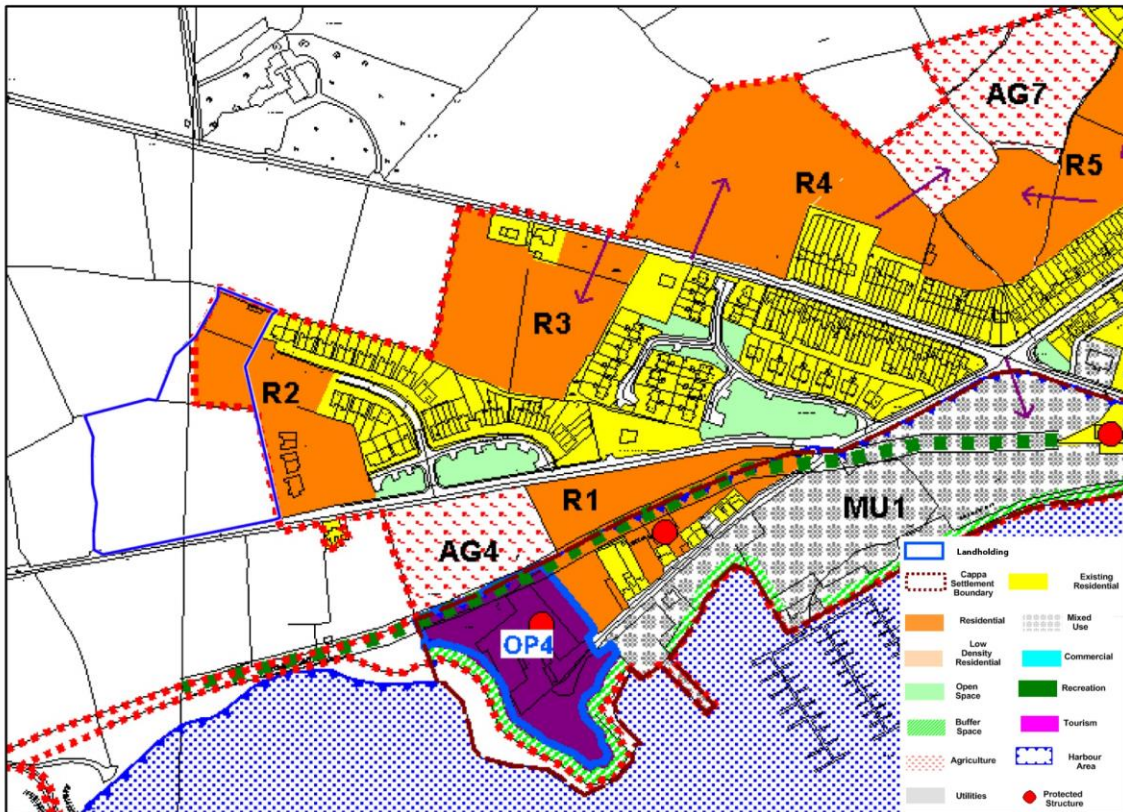
*“to ensure that Kilrush town, Cappa and the rural hinterland achieve a sustainable and balanced population increase by providing a high quality and mix of housing for all members of the community whilst conserving the distinctive character of the settlement area”.*

The Development Plan also seeks,

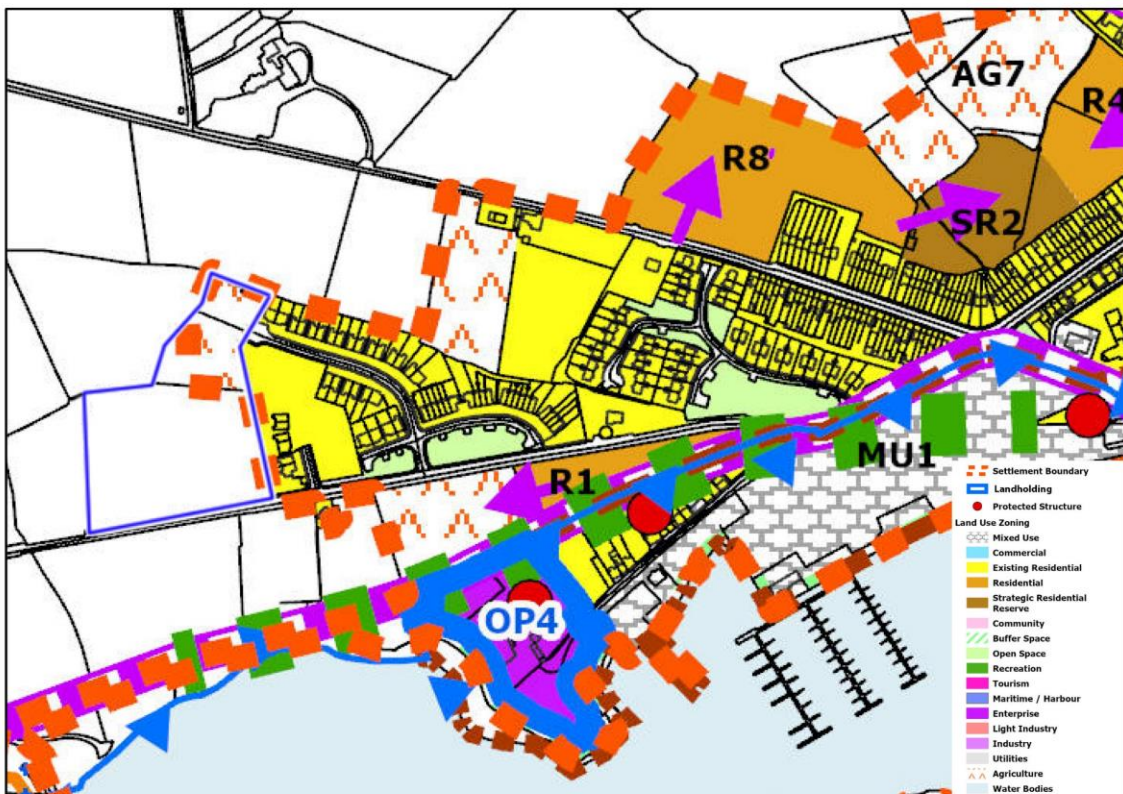
*“to develop Kilrush as a key location in West Clare for industry, employment, enterprise, renewable energy and maritime research and development based on the availability of a vibrant working population and a high quality environment in which to work and do business”.*

These objectives have, in general, been carried forward into the Draft Plan and demonstrate the importance of promoting residential growth in the town to facilitate a vibrant working population whilst conserving the distinctive character of the settlement area.

Existing Land Use Zoning



Proposed Land Use Zoning



### 3.2 Draft Development Plan

The Draft Development Plan currently on public display has changed the zoning on part of the land such that none of the land is now zoned for a development purpose. See Figure 2.0. This change has occurred notwithstanding continued objectives in the Draft Plan to ensure that Kilrush town achieves a sustainable and balanced population increase and that a high quality and mix of housing is provided for all members of the community.

The Draft Plan envisages the town to grow by 355 no. persons over the plan period, between 2023 and 2029 and has zoned 12.32 hectares of land to facilitate such growth. The 12.32 hectares is intended to accommodate circa 185 no. residential units, equating to a density of circa 15 units per hectare, assuming all land is available for development and is developable. In this regard, it is noted that the Draft Plan has not made any provision for lower density sites, commensurate with the national strategy to facilitate New Homes in Small Villages and Towns, all in accordance with Policy Objective RPO26(g) of the RSES.

The subject site, located on the fringe of the town, but within a 10 minute walking distance of the town centre (820m) would be particularly suited to lower density housing provision and further would facilitate greater connectivity between the town centre and the neighbouring graveyard which serves the town and surrounding rural area.

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 town needs to be reconsidered to provide for market choice and to diversify future delivery and different house types and models over the plan period 2023 – 2029.

## 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 towns such as Kilrush. Such national and regional policy also influences the extent and intensity of development envisaged for towns, against a backdrop of revitalisation and regeneration.

### 4.1 National Planning Framework (NPF)

The NPF seeks to focus growth in towns 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....."*

Securing compact and sustainable growth is key to the NPF 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”.*

It is considered that a viable, alternative approach to housing is required in towns such as Kilrush, with a balanced approach to density necessary to ensure a practical alternative to living in the countryside. The subject land can deliver such an approach, providing lower density housing on serviced land, within a 10 minute walk of the town centre, but yet within a more rural landscaped setting.

#### 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

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.

### 5.0 DEVELOPMENT INTENT

Reflective of national and regional policy, it is proposed to advance a low density development of high quality residential units on the land, as a suitable alternative to constructing one off housing in the countryside. There are a number of third parties interested in purchasing a serviced site from the owner of the land, with the express purpose of designing and developing a private residential unit for their own occupation.

It is considered that this development approach should be very much supported by the planning authority as it provides a viable alternative to one off housing in the countryside.

Further this approach supports Policy Objective RPO26(g) in the Regional Economic & Spatial Strategy for the Southern Region (RSES), whereby it

*“seeks investment in the sustainable development of a “New Homes in Small Towns and Villages” initiative in the Region and the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create “build your own home” opportunities within the existing footprint of rural settlements”.*

The RSES recognises and supports the economic role and potential of Kilrush as an economic driver in a potential North Kerry/West Limerick/Clare network, along with Listowel, Abbeyfeale and Newcastle West, connected with the Shannon Estuary. Specifically, Moneypoint Power Station has played an important role in the economy of Kilrush for over 30 years. Recent plans to establish a green energy hub at Moneypoint will lead to continued and sustained investment in the town, with a focus on job creation and diversification.

High quality housing shall be required to support the jobs economy and entice qualified and experienced workforce to live in the area, supporting initiatives such as a green energy hub in Moneypoint and the Offshore Renewable Energy (ORE) potential in the Shannon Estuary. Such housing can be delivered on the subject land, taking advantage of scenic views. Proximity to the town centre and yet a rural feel.

In addition to the provision of housing on the land, it is proposed to extend the existing public footpath and lighting to connect with the graveyard located on adjacent land to the west. Further to discussions with the Council, consideration could also be given to the delivery of parking spaces dedicated for the use of the graveyard.

The subject site is located within a 10 minute walk of the town core, as defined in the Draft Plan. The subject land can therefore be comprehensively developed in support of the “10-minute” town concept, whereby community facilities and services are accessible within a short walking timeframe of the site.

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 the short term and will deliver development outcomes on the subject land.

## **6.0 SEQUENTIAL APPROACH TO DEVELOPMENT**

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".*

Figure 3.0 provides an analysis of the residential landuse zoning using walk-time distances of 500m; 1,000m and 1,500m. These walk-times have been produced using ArcGIS and they identify all new residential zoned land in the town of Kilrush, including the subject lands. Figure 3.0 demonstrates that of the 12.3 hectares of land that is zoned for new residential use, circa 2.5 hectares of land is located outside of the 1,500m walk-time boundary from the town centre. In contrast, the subject land comprising 2.13 hectare is located entirely within the 1,500m walk-time boundary. This clearly illustrates that the subject land is more closely located to the town centre than other zoned residential land in the Draft Plan, contrary to the principles of a sequential approach to development.

The subject lands for which residential zoning is sought, are more spatially centrally located in contrast to the R5 lands and part of the R6 lands, which are more spatially peripherally located. It is thus submitted that the subject lands, currently unzoned in the Draft Plan, should be prioritised for development first, with R5 lands being zoned subsequently, all in accordance with the sequential approach to development.

## **7.0 THE REQUEST**

It is requested that the planning authority changes the landuse zoning in respect of the subject land as detailed in Figure 1.0, such that the existing residential zoning is reinstated on the land (0.45 hectares) and that an additional 1.68 hectares of land is zoned for residential use. The following changes are requested:

1. Extend the settlement boundary to fully incorporate the subject lands.
2. Change the zoning of 0.45 hectares of land from proposed agricultural use to residential use; and
3. Zone 1.68 hectares of adjoining land for residential use.



**Figure 3.0** Walk-time Distances from Town Centre