PLANNING LAND

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Development Plan Submission

Newmarket on Fergus

On behalf of

Newmarket on Fergus Community Forum

by

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1.0 Introduction

This submission to the Draft Clare County Development Plan 2023-2029 has been prepared by Cunnane Stratton Reynolds in accordance with section 12(2)(b) of the Planning and Development Act 2000, as amended. This submission is made on behalf of our client, Newmarket on Fergus Community Forum and focuses on policies and objectives in relation to the town and its rural hinterland.

This submission is structured under the following headings:

- 1. Introduction;
- 2. Background;
- 3. Newmarket on Fergus Community Forum;
- 4. What this Submission Seeks to Achieve.
- 5. The Draft Community Development Plan (The Community Forum Plan);
- 6. National Planning Advice and Regional Spatial and Economic Strategy;
- 7. The Vision, Goals and Core Strategy of the Emerging Clare County Development Plan;
- 8. Elevating the Status of the Town;
- 9. Aligning Commercial and Economic Objectives (Strand 1 of the Forum Plan);
- 10. Aligning Social Objectives (Strand 2 of the Forum Plan);
- 11. Aligning Tourism Objectives (Strand 3 of the Forum Plan);
- 12. Delivering Infrastructure and Environmental Enhancement (Strand 4 of the Forum Plan);
- 13. Amendments and Proposals for the Newmarket on Fergus Settlement Plan (Volume 3 of the Draft County Development Plan); and,
- 14. Conclusions

On behalf of our client, we would like to congratulate the County Council on the preparation of the Draft County Development Plan 2023-2029 that is positively disposed towards development, investment and job creation whilst seeking to ensure that the proper planning and sustainable development of the county is achieved over the plan period.

The Community Forum welcome the opportunity to engage in the plan making process and would be happy to discuss the contents of this submission further with Clare County Council.

2.0 Background

Newmarket on Fergus is a former market town as its name would suggest but no longer has an active regular market. It benefits from being strategically located on the road network, namely the N18 which is the main Limerick to Ennis road. The bypassing of the town brought considerable environmental benefit but reduced throughput and visitors to the town. The environmental enhancements benefitting from limited vehicular traffic are substantial when taken in tandem local initiatives visually enhancing the town and its environs.

The town has a particularly active and successful community and voluntary sector that has been successful in obtaining significant funding for the town down through the years which has been spent on infrastructure upgrade, the provision of facilities and amenities for those that work in, live in and visit the town.

3.0 Newmarket on Fergus Community Forum

The Newmarket on Fergus Community Forum is a group of local volunteers who came together following a series of public meetings to address a range of issues raised by the community. It is a cross community group representative of the various community and volunteer groups within the town. The Community Forum is made up of representatives from Community groups, Education, Sporting organisations, Business Community, and representatives from the general community. The broad role of the Community Forum is to work with established Community Groups, the Local Authorities and Community Members to create a viable Community Development Plan that meets the needs of the whole community.

The Community Forum brings together various interests under one umbrella. In the context of physical development and planning a member of the Community Forum (Obair) has delivered a number of key facilities within the town. These include 3 no. flagship projects for the town namely:

- (1) The Community Crèche
- (2) Tradaree Hub; and,
- (3) Meals on Wheels.

The Community Crèche

Obair Community Crèche and After School Project provide childcare facilities for children aged between 3 months and 13 years, as well as Post Primary. Key services include: full day care service from 8am to 6pm; ECCE free pre-school places for a year or up to 2 years; after-school club with homework supervision followed by free play and hot dinner; and camps over midterm breaks and holidays.

Tradaree Hub

The Tradaree Hub houses the Meals on Wheels Service and also consists of remote working offices, food start up incubation hubs, a 16 station cookery training school as well as a revamped Youth Space. The project will provide 16 spaces for trainee chefs, as well as a start-up hub for local food producers. The building will also house Obairs' newly revamped Youth Space, an alcohol and drug free recreational area that is available for young people.

Meals on Wheels

Obair aims to combat social isolation through the provision and delivery of daily hot meals to older people in Co. Clare. Their two-course meals are delivered hot from Monday to Friday over a 7 day service week. This service is delivered daily to the areas of Ennis, Shannon, Newmarket on Fergus, Quin, Doora, Clarecastle, Ballyea, Dangan, Kilkishen, Kilmurry, Sixmilebridge and Bunratty. The Meals on Wheels service has 5 delivery vans and 6 routes.

Success has been achieved in obtaining funding from various sources for infrastructural upgrade in the town and they recently obtained funding for the development of O'Regan Park which is such an important recreational amenity asset to the town.

4.0 What this Submission Seeks to Achieve

The Community Forum has been successful in obtaining funding for a variety of environmental enhancements and development proposals. The Community Forum in recent times has undertaken a demographic assessment of the town, as well as community surveys, and produced a list of well-grounded and supported proposals incorporated within a Draft Community Development Plan 2021-2024. The broad purpose of this submission is to align the findings and recommendations of the Community Plan with the provisions of the Draft County Development Plan and to ensure that, wherever possible, the proposals and objectives contained in the Draft Community Plan are supported in the statutory Draft Clare County Development Plan which is currently on public display inviting comments for the public and interested parties.

The further purpose of this submission is to ensure that key proposals emanating from the Community Plan are supported in the emerging County Development Plan and that specific proposals in the Settlement Plan contained within Appendix 3 of the Draft County Development Plan suite of documents is considered and supported by the local community with an additional focus on environmental enhancement and infrastructural improvements. We seek to ensure that the objectives of the emerging Plan reflect the objectives and proposals of the Community Plan, particularly in respect of the 4 no. key strands of the Community Plan.

A key objective for this submission is to ensure that the emerging plan is as favourable to the town and its future development as possible and that its status within the settlement hierarchy of the county is maintained and where possible enhanced and that ultimately the standing and function of the town is reflective of a modern day equivalent of a market town that is fully accessible via various media. It is intended that the standing of the town and opportunities that are potentially available to it, particularly in respect of tourism and economic development, are maximised. It is essential that those aims set out as 4 no. strands are supported in the emerging County Development Plan.

5.0 The Draft Community Development Plan 2021-2024 (The Community Forum Plan)

The Community Forum Plan, undertaken with the assistance of CLDC, identifies the following key points following consultation and survey within the community. These act as a useful background to this submission:

 Newmarket on Fergus is a community of local residents as well as a destination that attracts visitors to the area;

- It has the youngest population in the county;
- The town has been very successful in the Government's Town and Village Renewal Scheme over the last few years with the development of the Tradaree project;
- There is a balanced employment base to the town;
- There is little cultural diversity amongst residents;
- Residents generally commute to work or school locally and within a 15 minute catchment; and
- There were considered to be a lack of amenities and activities in the area, a lack of Gardai presence, road safety concerns and limited local services.

There are 4 key strands to the Community Forum Plan-and that provide structure to this submission as follows:

- 1. Economic Sustainability: Commercial and economic development;
- 2. Social Sustainability: A cohesive, vibrant and safe community;
- 3. Tourism: An enhanced tourism product; and
- 4. Environmental Sustainability: Environmental enhancement and infrastructure development.

The vision, goals, principles, objectives and proposals of the Draft County Development Plan are assessed below in the context of these 4 no. community generated strands.

6.0 National Planning Advice and Regional Spatial and Economic Strategy

The National Planning Framework (NPF) - Project Ireland 2040

The NPF is based on 10 no. National Strategic Outcomes (NSO's). The following NSOs are of particular relevance in the context of this submission:

- NSO 01 Compact Growth
- NSO 02 Enhanced Regional Accessibility
- NSO 03 Strengthened Rural Economies and Communities
- NSO 04 Sustainable Mobility
- NSO 05 A Strong Economy supported by Enterprise, Innovation and Skills
- NSO 06 High Quality International Connectivity
- NSO 07 Enhanced Amenity and Heritage
- NSO 08 Transition to a Low Carbon and Climate Resilient Society

NSO 09 - Sustainable Management of Water, Waste and other Environmental Resources

NSO 10 - Access to Quality Childcare, Education and Health Services

The NPF recognises that the Southern Region is supported by a strong rural economy and a variety of towns and villages. It is noted that "future growth in the region will be based on leveraging national and international connectivity, higher education capacity and quality of life to secure strategic investment. This must be underpinned by sustainable employment and housing development, focused on the broader Limerick- Shannon Metropolitan area and a strengthening of the urban cores of the county towns and principal settlements, as well as in rural areas".

The NPF sets out the key future planning, development and place making policy priorities for this region, and which are very relevant to the future development of Newmarket on Fergus, including:

- Measures to support the integrated development of remoter parts of this region, particularly rural peninsular areas and towns on its western seaboard, including the ongoing investment in the transport and communications areas, particularly in the rollout of the national broadband scheme and further promotion and development of attractions to capitalise on underutilised potential in the tourism and local enterprise areas.
- Integrated planning, management and development of the areas traversed by the Wild Atlantic Way to maximise both the quality and integrity of the visitor experience and the added benefit in economic terms, especially for rural and local communities.
- Developing a more integrated network of greenways, blueways and peatways to support the diversification of rural and regional economies and promote more sustainable forms of travel and activity based recreation.

The NPF requires that Local Authorities must therefore consider the varied growth potential of different settlement types as well as rural areas and tailor a strategy to balance this accordingly.

The following NPF policy objectives are of particular note in the context of this submission:

NPO 3a - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

NPO 4 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

NPO5 - Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment, and prosperity.

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.

NPO9 - In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- Agreement (regional assembly, metropolitan area and/or local authority as appropriate).
- Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target.; and
- A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services.

NPO 27 - Ensure the integration of safe and convenient alternatives to the car into the design of communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

The NPF emphasises the role of placemaking in economic prosperity as city regions are now the focal point for investment and seeks to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

The key national planning objectives in the context of Newmarket on Fergus, and all towns in the county of similar size and stature, are NPO4 which seeks to ensure that towns like Newmarket on Fergus are attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being and NPO6 which seeks to achieve the regeneration and rejuvenation of small towns as environmental assets that can accommodate changing roles and functions and increased residential population and employment activity as well as enhanced levels of amenity and design quality.

Building on the 2017 Government Action Plan for Rural Development, the NPF places a major focus on strengthening Irelands rural fabric and supporting the communities that live there by planning for the future growth and development of rural areas with a special focus on activating the potential for the renewal and development of the smaller towns and villages and addressing connectivity gaps.

The role of Ireland's natural resources is recognised and through the development of the agriculture, food, forestry, tourism and renewable energy sectors, these assets will sustain rural employment and contribute to driving the national economy.

NPO 21 seeks to "Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability". This is supported by our client.

The Regional Spatial and Economic Strategy for the Southern Region (RSES)

The RSES identifies the high-level requirements and policies of the Southern Region. It sets out the framework for Local Authorities and relevant stakeholders to implement the NPF within the context of the RSES.

The Regional policies of the RSES align with the National Planning Framework (NPF) and seek to achieve the same 10 strategic outcomes as listed for the NPF above.

The RSES supports the Department of Rural and Community Development's Action Plan for Rural Development which seeks to increase tourist numbers to rural Ireland, support sustainable jobs through targeted tourism initiatives, develop activity tourism and leverage natural and built heritage assets.

In relation to the development of tourism in the region, RPO53 includes the following objectives:

- "Enhance provision of tourism and leisure amenity to cater for increased population in the Region including recreation, entertainment, cultural, catering, accommodation, transport and water infrastructure inter alia.
- Sustainably develop the road network and public transport services and facilities for improved visitor access, longer dwell times due to improved connectivity to ports and airports and tourism growth.
- Sustainably develop walking and cycling trails opening greater accessibility to the marine and countryside environment by sustainable modes and promote the sustainable designation and delivery of Greenway and Blueway Corridors.
- Facilitate appropriate tourism development and in particular a National Greenways,
 Blueways and Peatways Strategy, prioritising sustainable projects that achieve maximum impact and connectivity at national and regional level."

The RSES identifies the high-level requirements and policies of the Southern Region. It sets out the framework for the Local Authorities and relevant stakeholders to implement the NPF within the context of the RSES. Specifically, the RSES includes a Metropolitan Area Strategic Plan (MASP) that provides a focus on Limerick City and the metropolitan settlement of Shannon.

Our client fully endorses these desired strategic outcomes which are highly desirable for towns such as Newmarket on Fergus and in particular the requirement for: (1) Compact growth; (2) Strong rural economies and communities; (4) Sustainable mobility especially in rural areas; (5) A strong local economy supported by enterprise, innovation and skills; (7) Enhanced culture, amenity and heritage; (8) Transition to a low carbon and climate resilient society; (9) Sustainable management of water, waste and other environmental resources; and finally,(10) Access to quality childcare, education and healthcare services. All these attributes should be the basis of the future development of all the county's towns and villages.

The town of Newmarket on Fergus is located within the Atlantic Economic Corridor as set out in the RSES. The town is perhaps more clearly located within and more functionally part of that corridor as shown with a red dot in Figure 1 below.



Figure 1: Newmarket on Fergus Location within the Atlantic Economic Corridor

<u>Limerick Shannon Metropolitan Area Strategic Plan (MASP)</u>

The Limerick Shannon Metropolitan Area Strategic Plan (MASP) is of significant strategic importance to this part of the south west region.

The vision statement for the MASP is "to create a sustainable, inclusive, smart, climate and economic resilient Limerick Shannon Metropolitan Area, which is competitive and of a scale which can exert critical mass leverage at an international level, maximising the economic, social, cultural and environmental opportunities in a manner for all those who live, work and visit the Metropolitan Area, Mid-West Region and for the benefit of the country". This unquestionably opens up opportunities for those parts of County Clare within the MASP area of which Newmarket on Fergus is one. Whether the town is marginally out, it is still part of the functioning metropolitan area and therefore a significant opportunity presents itself not just for the town but for the county also to have it included or to seek to have the Regional Authority seek to have it within the MASP area which better represents the town's potential.

This sphere of influence of the Limerick-Shannon MASP extends northward towards Galway, southwards towards Cork and Tralee, eastwards towards Tipperary Town and Nenagh, and west towards Kerry. The catchment has a number of dynamic relations including: international connectivity through the Port and Airport, connections to the Dublin, Galway, Cork and

Waterford metropolitan areas, connection to Key Towns in the Mid-West and its relationship to surrounding towns, villages and rural areas. That sphere of influence easily encompasses the town of Newmarket on Fergus therefore.

Crucially for Newmarket on Fergus the MASP identifies the following opportunities for towns and rural areas within the metropolitan area:

"Other settlements and rural areas have potential for complementary roles, interacting with the Metropolitan Area and benefitting from the economic spread from larger centres of scale, nurturing local enterprise growth, local jobs and developing strong roles that contribute to their mutual success. There are opportunities for networks of settlements, harnessing specialist roles and driving shared strengths to generate stronger economic interactions with the Metropolitan Area. Enhanced connectivity (transport and digital) within the Metropolitan Areas, between other settlements and between other Metropolitan Areas is an essential enabler to strengthen these opportunities."

As indicated above, enhanced connectivity of both the transport and digital nature, are the key enablers. These significantly apply to Newmarket on Fergus.

That future growth and ambition for the MASP, to which that connectivity is key, is based on the principles of Sustainable Place Framework. For the development of the Limerick Shannon MASP, the following guiding principles apply:

- · A living city and metropolitan area
- Limerick Shannon as a global gateway
- Compact sustainable growth
- Integrated transport and land use
- Accelerate housing delivery
- Employment density in the right places
- Social regeneration
- Future development areas
- Metropolitan scale amenities
- Enabling infrastructure
- Coordination and active land management

Goal 1: Future Sustainable Framework in one of its key objective indicates that "This framework reinforces the positive relationship between the city centre, metropolitan area and wider region as complementary locations, each fulfilling strong roles. It positions quality place making at the core."

A key emphasis is placed within the MASP on enhancing the quality of existing places through retrofitting a high standard of infrastructure, services and amenities that improve the liveability and quality of place in existing settlements and communities,_especially locations that experienced significant new population growth in the past (such as metropolitan towns) and existing areas experiencing positive growth.

The MASP identifies significant opportunity for the Limerick Metropolitan Area to expand as a globally recognised centre of excellence for software engineering/ aviation/ logistics talent. Newmarket on Fergus will have a relatively limited role in assisting in this but would still remain an attractive place for residents, visitors and those working in the MASP area. It is also reasonable to assume that there will be some benefit to the town being located within or on the cusp of the MASP area especially in relation to Limerick and the Shannon being a centre for research and development for autonomous vehicles that will complement its role as a world leader in aviation and a centre for manufacturing, engineering, and distribution. The attraction in respect of Newmarket on Fergus may be in providing residential opportunities or as a link between Limerick/Shannon and Ennis.

Limerick-Shannon MASP Policy Objective 9 is key for not just Newmarket on Fergus but also that part of the county within the MASP area. Its states:

"Potential Collaboration NetworkGalway-Ennis-Shannon-Limerick (GESL) Economic Network

- a. It is an objective to deliver the effective planning and development of the Metropolitan Ares and Key Towns along the potential Galway-Ennis-Shannon Limerick (GESL) Economic Network.
- b. It is an objective to deliver excellent public transportation connections in the potential GESL Economic Network."

Goal 2: Excellent Connectivity and Sustainable Mobility seeks to "To encourage the development of sustainable modes of transport to serve the smaller towns, villages and rural areas."

Goal 3: Economic Engines Driving Regional Enterprise Growth seeks to have a competitive international edge through actions which support:

- Smart specialisation, strengthening and evolving existing economic sectors and clusters, supporting partnerships across academia and research centres, public bodies, business sector and local communities;
- Embracing technology change, transitioning with resilience and innovation towards a smart technology future in how we live and work sustainably;
- Offer excellent standards of infrastructure services and property assets for all scales of enterprise, from start-ups to FDI;
- Quality of life offer, with attractive options for housing in the right locations, community infrastructure and recreation options easily accessible from locations of work.

Goal 4: High Quality Environment and Quality of Life seeks to have a high-quality environment and quality of life. This will be achieved by:

 Healthy city and heathy metropolitan area status with equity of access to health services, high ratios of access to quality open space and recreational amenities per population and attractive options to uptake active travel between home, work, education and access to services;

- Setting high quality performance standards for the metropolitan area to transition towards a zero-carbon future, achieve improved water and air quality, improved sustainable travel and other environmental and health performance standards as indicators for the healthy status of metropolitan areas;
- Fostering a creative metropolitan area with vibrant cultural, arts and heritage scenes;
- Fostering a vibrant tourism scene with facilities and attractions that showcase the unique heritage, natural environments and culture of our Region, enriching the experiences of both visitors and citizens;
- Placing a greater emphasis on performance-based design criteria in developing our metropolitan area, incentivising and awarding innovation in design, energy efficiency, green infrastructure and smart technology integration.

Goal 5: A Learning, Welcoming and Socially Inclusive Metropolitan Area which will achieve a socially inclusive, multi-cultural metropolitan area with equal opportunities for learning supported by actions promoting the following:

- UNESCO Learning City status and drivers for a Learning Region;
- The role of HEI's and centres of innovation, regional skills, training and apprenticeships;
- Targeted initiatives that address social exclusion and prioritise regeneration of disadvantaged areas, especially RAPID areas including education and training;
- Valuing the participation of communities and Public Participation Networks;
- Community Services and engagement for ethnic minorities and travellers;
- Initiatives that protect and develop the potential of our younger and aging cohorts;
- Facilities that provide inclusive social, community and recreational facilities for mixed neighbourhoods

RSES MASP Objective 11 states that "it is an objective to develop, deepen and enhance the economic resilience of the Limerick Shannon Metropolitan Area through creating a vibrant and diversified economic base, with strong healthy connected clusters drawing on Eolas Comhroinnte Obair le Cheile/ Shared Knowledge Working Together (ECOLC/SKWT) to assist in bringing disruptive technologies and innovations to national and global markets."

Further relevant Government guidance this submission adheres to are a) *Town Centre First* 2022 and b) *Our Rural Future* 2021-2025, both issued by the Department of Rural and Community Development. *Town Centre First* provide guidance to:

- Establish a variety of services/shops that provide employment opportunities, enable people to shop locally and meet the needs of the local community
- Create an attractive public realm (streets, spaces and parks) that is designed to invite people to meet, mingle and dwell
- Provide a range of cultural, recreational and community spaces
- Contain a well-maintained building stock that creates visual interest and animates streets and spaces

- Conserve, adapt and highlight historical buildings and streetscapes that provide the town with a unique identity
- Create attractive vibrant places for enterprises to grow and develop
- Support well connected and accessible sustainable modes of transport, enabling a high proportion of journeys to be made by foot and/or bicycle from the immediate hinterland (e.g. the '10 minute town' concept)
- Manage traffic within central areas so that streets prioritise vulnerable users (pedestrians and cyclists), enabling them to move about safely and in comfort
- Provide a mix of housing typologies and tenures to cater for diverse communities in terms of age, income and mobility
- Utilise digital technology to enhance the experience of living and working in towns, enabling greater choices in terms of location and lifestyle
- Provide opportunities for the amenity, health and well-being of residents, workers and visitors.

Our Rural Future 2021-2025 outlines the vision for:

- Optimised digital connectivity
- Support of rural employment and careers
- Revitalising towns and villages
- Enhancing participation, leadership and resilience
- Transition to a climate neutral society

7.0 The Vision, Goals and Core Strategy of the Emerging Clare County Development Plan 2023-2029

The Vision

Our client whole heartly endorses the vision of Clare County Council set out in the Draft County Development Plan 2023-2029 and they look forward to seeing policies and objectives that enable this vision to be achieved over the period of the emerging plan.

Whilst supporting the emerging vision the Community Forum 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."

Our client envisages to achieve this through maximisation of Newmarket on Fergus' unique characteristics, strengths, location and connectivity.

Emerging Goals of the Draft County Development Plan

Our client supports the following goals expressed in section 1.6 of the Draft Development Plan which relate to their existing properties and facilities within the county:

"Goal I: A county that is resilient to climate change, plans for and adapts to climate change and flood risk, is the national leader in renewable energy generation, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy.

Goal II: A county that drives local and regional sustainable growth by harnessing the potential of its unique location, quality of life, natural resources and other competitive advantages.

Goal III: A county with strong and balanced urban and rural areas providing key services and a good quality of life and where people with social or economic requirements to live in the countryside are accommodated.

Goal V: A county in which jobs and people are brought together and where the sustainable growth of employment, indigenous enterprise and economic activity is pursued proactively across all economic sectors throughout the county.

Goal VII: A county with diverse and strong rural communities and economy, where its natural resources are sustainably managed in a manner that is compatible with the fragility of rural areas and the existing quality of life.

Goal IX: A county where healthy and sustainable communities are developed and integrated with the timely delivery of a wide range of community, educational and cultural facilities and where, through a commitment to equality, participation, accessibility and social inclusion, the county develops as a unique location with an enhanced quality of life for its citizens and visitors.

Goal X: A county that supports strong economic growth and a high quality of life for all residents through the provision of efficient and robust physical infrastructure whilst having regard to environmental responsibilities and complying with European and national legislation.

Goal XIX: A county that manages and monitors the county level implementation of the National Planning Framework, Regional Spatial Economic Strategy, national plans and guidelines to ensure that quality of life, sustainability, climate action, resilience and inclusivity are the fundamental principles of the future sustainable development of the county."

Our client sees the above key elements harnessing the potential of the county's unique location, quality of life, natural resources and other competitive advantages that must be developed and extenuated. This is particularly in the context of tourism and economic development, where the county's natural resources must be sustainably managed in a manner

that is compatible with the fragility of rural areas, but which supports strong economic growth whilst having regard to environmental responsibilities and complying with European and National legislation.

The Draft Core Strategy

Section 2.7.2 (Core Strategy) states the following:

"Development Plan Objective: Smart Growth Initiatives CDP2.4

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."

We dispute that this objective, as currently worded, should be confined to only urban areas and in response suggest 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."

8.0 Elevating the Status of the Town

A key aim of this submission is to elevate the status of Newmarket on Fergus and this has two components:

- Elevating the town to that of a defined Service Town as per the settlement hierarchy in the emerging County Plan.
- Seek the inclusion of the town within the Limerick Shannon MASP area.

Elevating the town to Service Town status

The town is currently defined in the emerging County Plan as a Small Town.

The 7 designated Small Towns in County Clare are Kilkee, Killaloe, Lisdoonvarna, Miltown Malbay, Newmarket on Fergus, Sixmilebridge and Tulla. The Draft Development County Plan states that "these towns are of fundamental importance as employment and tourist centres and as centres for the provision of services and facilities for their resident populations and their rural hinterlands. The strategy for these settlements is to ensure that their existing roles are maintained and further strengthened through measures such as the adequate zoning of lands for development, supporting the concept of settlement networks, seeking investment to regenerate and rejuvenate these settlements, supporting and working with the relevant bodies towards the development of the required ancillary infrastructure, and the adoption of a facilitatory approach towards appropriately-scaled and designed urban development."

The objective that is connected to Service Towns is Development Plan Objective CDP 4.5 which states that:

"It is an objective of Clare County Council:

- a) To ensure that the Service Towns are each drivers of growth and prosperity for their respective catchments, by consolidating their administrative, retail and service bases, protecting and enhancing their distinctive town centre characteristics and natural landscape settings, and maximising their role for sub-regional growth;
- b) To work with the relevant bodies and to seek investment for the timely and sustainable delivery of holistic infrastructures, to enhance the levels of amenity and design quality and to regenerate and rejuvenate the Service Towns throughout the County; and
- c) 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."

Associated with their designation is Development Plan Objective: Small Towns CDP 4.6 where:

- a) "It is an objective of Clare County Council:
- b) To ensure that the small towns throughout the County continue to act as important local service centres that maintain sustainable communities, help to ensure a good quality environment, provide public transport to the main centres, and provide a high quality of life for those who live in the vicinity;
- c) To work with the relevant bodies and to seek investment for the timely and sustainable delivery of holistic infrastructure, to enhance the levels of amenity and design quality and to regenerate and rejuvenate the Small Towns throughout the County;
- d) To ensure that future growth is incremental and balanced in nature, and is relative and appropriate to the scale, size and character of the small towns and to seek to achieve centre out compact growth;
- e) To seek investment in the sustainable development of a 'New Homes in Small Towns and Villages' initiative in the County and the provision of services and serviced sites to create "build your own home" opportunities within the existing footprint of small towns; and
- f) 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."

The intention would be to have the Newmarket on Fergus designated as a *Service Town*. The designated Service Towns in County Clare are Kilrush/Cappa, Ennistymon/Lahinch and Scarriff/Tuamgraney which have been designated as service towns due to their role as important service centres in their respective Municipal Districts and as drivers of growth for their surrounding hinterlands. Also being located within a Municipal District the town has a

more significant population than two of the 3 no. identified centres and seeks to enhance its range of services and act as a growth centre for the surrounding hinterland.

The Community Forum view the advantage of Newmarket on Fergus being a Service Centre as consolidating the town's retail and service base, which it is acknowledged needs to be expanded, whilst at the same time protecting and enhancing the distinctive town centre characteristics and natural landscape setting of the town including Lough Gash, and maximising the town's role for sub-regional growth. It is in that context of maximising the town's role for sub-regional growth being located on the N18, so close to Shannon, Limerick City and Ennis, that not only is service centre designation sought but also inclusion within the Limerick Shannon MASP area as set out below.

The request for elevation of the town from *Small Town* to *Service Town* spans one level of the settlement hierarchy as indicated below. Its place in the settlement hierarchy is shown in Table 1 below which is an extract from the emerging plan.

Table 1: County Clare Settlement Hierarchy extracted from the Draft County Development Plan.

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	
(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)	
Shannon SDZ Sixmilebridge (Small Town) Athlunkard, Bunratty, Clonlara, Parteen, Ballycannon North, Meelick (Large Villages) Ardnacrusha, Cratloe, O'Briensbridge (Small Villages)	
SDZ Sixmilebridge (Small Town) Athlunkard, Bunratty, Clonlara, Parteen, Ballycannon North, Meelick (Large Villages) Ardnacrusha, Cratloe, O'Briensbridge (Small Villages)	
Sixmilebridge (Small Town) Athlunkard, Bunratty, Clonlara, Parteen, Ballycannon North, Meelick (Large Villages) Ardnacrusha, Cratloe, O'Briensbridge (Small Villages)	
Athlunkard, Bunratty, Clonlara, Parteen, Ballycannon North, Meelick (Large Villages) Ardnacrusha, Cratloe, O'Briensbridge (Small 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	
Ballyvaughan, Clarecastle, Corofin, Crusheen, Doonbeg, Feakle, Inagh, Kilkishen, Mountshannon, Mulla Quin, Whitegate, Liscannor, Kilfenora and Killimer	agh, Quilty
Tier 2	
Kiladysert, Kilmihil	
Small Villages	
Barefield, Bridgetown, Broadford, Carrigaholt, Cooraclare, Doolin, Kilmaley, Kilmurry, Labasheeda, Lis	ssycasey,

It should be noted that the settlements immediately above Newmarket on Fergus, in the *Service Town* category are predominantly clustered or effectively twinned, whereby Newmarket on Fergus has the critical mass of development, urban form, infrastructure and population to merit inclusion within that upper level on its own. For example, Ennistymon is clustered with Lahinch, Kilrush is clustered with Cappa, and Scarriff is clustered with Tuamgraney.

From Table 2 below it is clear that the population of Newmarket on Fergus exceeds Ennistymon/Lahinch and Scarriff/Tuamgraney by a substantial margin. From a population perspective the elevation of the town to the 'next level' is fully justified. Newmarket on Fergus has a population on its own sufficient to achieve and benefit from any subregional designation

of the town within the Limerick Shannon MASP. The above settlements would have one thing in common and that is that they are existing tourist centres. Newmarket on Fergus is in close proximity to Bunratty and Shannon Airport, is the location of Dromoland Castle, and the most extensive ring fort in the State at Mooghaun Hill., which is the most extensive hill-fort in Ireland. The town also has a disappearing lake at Lough Gash within 150m of its town centre. All of these features have already, or have the potential to be, significant tourist attractions, either on their own, or in a cluster as advocated in the emerging County Development Plan (there are numerous references to linkages of tourism activity and places of interest). Newmarket on Fergus therefore already has many of those characteristics of a defined *Service Town* and therefore should be defined as one.

Table 2: Reproduction of the Core Strategy Table from the Draft County Development Plan.

Settlement Typology	Settlement	2016 as a % of County	2016 Population	Core Strategy 2023-2029 Population Allocation	Housing Units	Brown Field (30%)	Density Units/ha	Housing Land Required in Ha	Zoning as per map in Ha
Key Town	Ennis	21.3	25,276	2,705	1,550	465	35/15	58.90	90.39
Totals		21.3	25,276	2,705	1550	465		58.90	90.39
Metropolitan Area	Shannon	8.3	9,899	1,060	552	166	35/15	20.98	N/a
	SDZ		U.	3,500	123+**		- (4	- 2	
	Sixmilebridge	2.2	2,669	357	186	56	35/15	7.07	7.26
	Athlunkard	2.9	3,486	215	112	0	35/25	5.18	4.92
	Bunratty	0.3	375	79	41	12	30/15	1.72	4.29
	Clonlara	0.6	684	142	74	22	30/15	3.11	4.5
	Parteen	0.7	834	50	26	0	30/15	1.56	2.6
	Ballycannon North(Meelick)	0.8	917	50	26	8	30/20	1.00	1.73
	Ardnacrusha	1.1	1,351	Part of unserviced rural area	Part of unserviced rural area				
	Cratioe	0.8	926						
	O'Briensbridge	0.3	325						
Totals	VENEZUELO CIVICI	18.1	21,466	5,453	1140	342		158.42	57.48
Service Town	Ennistymon/ Lahinch	1.3	1,567	223	116	35	25/10	6.33	9.65
	Kilrush/Cappa	2.1	2,489	355	185	56	25/10	10.10	12.32
	Scarriff/ Tuamgraney	0.7	805	113	59	18	20/10	3.72	6.08
Totals		4.1	4,861	691	360	108	-	20.15	323.79
Small Town	Kilkee	1.0	1,155	123	64	19	20/10	4.03	7.21
	Killaloe	1.2	1,393	148	77	23	25/10	4.20	5.87
	Lisdoonvarna	0.7	800	85	44	13	20/10	2.77	3.81
	Miltown Malbay	0.6	769	83	43	13	20/10	2.71	2.48
	Newmarket-on- Fergus	1.7	1,968	209	109	33	25/10	5.95	6.82
	Tulla	0.6	759	81	42	13	25/10	2.29	5.77
Totals Large Villages-	Ballyvaughan	5.8 0.3	6,844 327	729 29	379 15	0	15/10	21,96 1.65	31.96 2.58
Tier1	Clarecastle (Ennis figure)								
	Corofin	0.6	751	63	33	0	20/15	2.64	3.58
	Crusheen	0.4	534	46	24	0	20/10	2.16	4.29
	Doonbeg	0.3	342	29	15	0	15/10	1.65	3.11
	Feakle	0.2	250	21	11	0	15/10	1.21	2.09
	Inagh	0.2	247	21	11	0	20/15	0.88	1.00
	Kilkishen	0.5	592	50	26	0	15/10	2.86	2.82
	Mountshannon	0.1	170	15	8	0	15/10	0.88	1.73

The reasons for elevating the town to *Service Town* status are as follows:

 As the name, Newmarket on Fergus, would suggest, the town originally provided a market for the surrounding area or at least had been associated with the market at Bunratty, which even in historical times would have been a relatively short distance away.

- Clustering of tourism attractions and activities are available in much the same way as the coupling of existing *Service Towns* such as Scarrif/Tuamgraney.
- The town is located on the N18 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.
- The town is home to Dromoland Castle a world renowned hotel complex.
- Dromoland Castle has the potential to elevate its golf course to next level status for competition, golf tour and event purposes
- Lough Gash, as a disappearing lake (thurlough), is a unique attraction in the county and in the sub-region
- The town is the location of the largest hill ring fort in Ireland at Mooghaun
- The Mid Clare Walkway starts in Newmarket on Fergus
- The town is in close proximity to the West Clare Greenway starting from Kilrush to Kilkee with potential to be extended to Newmarket on Fergus
- The elevation of the town to *Service Town* status would enable these existing and prospective tourist advantages to be maximised
- 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
- 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
- Service Town designation would help ensure retention and improvement to services such as An Post, utility provision, banks as part of its inclusion within the Limerick Shannon MASP
- MASP would accentuate the advantages of the town being in the Limerick Shannon MASP

The building blocks (attractions and unique features of interest) are all there already over a range of interests.

Inclusion of Newmarket on Fergus within the Limerick Shannon MASP area

From the above we would ask that Newmarket on Fergus be identified or recommended in the emerging Draft County Development Plan for inclusion within the MASP spatial area to elevate its status to that of Sixmilebridge for a number of reasons. These include:

• The town would appear to be located within or on the very edge of the MASP area.

- The town is located a short distance away 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.
- One could argue that Newmarket on Fergus is as convenient if not more convenient to both Shannon and Limerick City than Sixmilebrdge which is located a further considerable distance away from the N18.
- Newmarket on Fergus is functionally part of the Limerick City and Shannon MASP.
- Newmarket on Fergus is located within the Atlantic Economic Corridor.

We would request that additional text be included supporting Newmarket on Fergus' inclusion within the MASP defined area in the emerging County Plan. We believe that this request should not only be of assistance to the town but also the County and it would be highly desirable from the County's perspective to have an additional Clare settlement included within the MASP area. We are aware that the decision to include the town in the MASP area is not a decision (solely) for the County Council but it would at least be a start if the County Council within which it is located would endorse or recommend its inclusion for the medium to long term.

We are aware that the MASP as part of the South RSES was adopted in January 2020 and therefore runs until 2032 (a 12 year period). This 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 from that point by reference to inclusion within the emerging County Development Plan which will have been adopted by then. It is important that the town is supported in the emerging County Development Plan as being worthy of consideration for inclusion into the MASP area.

9.0 Aligning Commercial and Economic Objectives (Strand 1 of the Community Forum Plan)

Within Strand 1 of the Forum Plan, relating to commercial and economic development, the key objectives are to:

- Identify through a feasibility study the commercial and tourism potential of the town;
- Support businesses to work together to promote, support and develop commercial activity in the town;
- Identify premises which could support commercial activity; and
- Identify and create linkages with other communities who have successfully developed and expanded commercial activity in their community.

The Community Forum supports Development Plan Objective *Economic Development and Enterprise CDP6.1* which seeks to:

- Support start-up businesses and small scale industrial enterprise at appropriate locations subject to compliance with the principles of proper planning and sustainable development.
- Support sectoral and location based strengths and synergies with existing employers and take advantage of 'ready to go' property solutions and local ambition.
- Support the development of innovation hubs and centres of excellence
- Leverage the opportunities from the Wild Atlantic Way.

The development of the food sector is one that must be encouraged and should be specifically mentioned within CDP6.1.

We request the amendment of CDP6.2 (Mid-West Regional Enterprise Plan) 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)."

The Community Forum 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."

Our client fully supports Development Plan Objective *Higher Education Institutes and the Knowledge Economy CDP6.7* which seeks to foster and develop strategic links with industries/businesses and higher education institutes in order to provide an enhanced locally-based knowledge economy and in order to improve education, training and skills development in the workforce. This is particularly relevant to Newmarket on Fergus where a knowledge based has been built up in regard to food preparation and where the facility at Tradaree within the town.

The Community Forum fully supports Development Plan Objective *Research and Innovation CDP6.11* where it is an objective of Clare County Council:

- "a) To support and facilitate the development and progression of beneficial interactions between industries located in County Clare and relevant higher education institutes;
- b) To work with relevant stakeholders to support research, innovation and enterprise development in the county including incubation facilities for new business development; and

c) To work with relevant stakeholders to secure funding to implement innovative and collaborative projects through funding mechanisms such as the Urban Regeneration and Development Fund, the Rural Regeneration and Development Fund, the Climate Action Fund, Horizon Europe, and the Disruptive Technologies Innovation Fund amongst others."

The Community Forum seeks the inclusion of Newmarket on Fergus 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.

Our client therefore supports Development Plan Objective *Clare Digital Hub Network CDP6.12* which states the following:

"To support the continued development of the network of digital hubs in order to facilitate remote working/coworking at appropriate locations, to attract new businesses to locate in County Clare, and to support the further growth and development of the digital and media industries in the county."

The town already has 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 as indicated above.

The Community Forum believe that the provision of culinary learning stations and the educational arrangements of Limerick Institute of Technology that are already provided at Tradaree along with established centres of fine dining at Dromoland and potentially with the return of a food offering at the Weaver's along with the well established Meals on Wheels service ensure that the necessary building blocks are in place to support Objective *The Food Industry CDP6.21* which seeks:

"To encourage and support the development of food networks throughout the County in order to support the expansion of the food industry."

In our view 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.

We believe that the following additional text in bold should be added to Section 6 of the emerging County Development Plan to reflect the challenges and opportunities identified by the Community Forum (emphasised in bold) in respect of economic development and tourism in particular;

 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.

10.0 Aligning Social Objectives (Strand 2 of the Community Forum Plan)

The second strand of the Community Forum Plan seeks to "build a cohesive, safe and vibrant community."

The key objectives include;

- To develop a community website for access to community organisations, events and activities.
- To support local organisations and groups for the benefit of the community as a whole.
- To organise community events and activities that are inclusive, accessible and help bring the community together.
- To expand the range of leisure, educational and cultural activities ad opportunities available in the community.
- To build on existing relationships with the Gardai and actively engage them in the delivery of relevant actions.

A key aim of the development plan is to ensure that the County is synonymous with a high quality of life based on healthy, vibrant, accessible, and inclusive communities, and by ensuring that future developments support these communities. Key aims of the emerging County Development Plan which are supported by the Community Forum include:

- Reduction in car dependency through locating residential developments in close proximity to existing services;
- Provision of accessible community facilities to enhance social interaction and quality of life;
- Creation of activity-friendly environments (e.g., cycle-lanes and walkways with lighting);
- Creation of compact and walkable urban forms to increase community cohesion; and
- Provision of local play and community facilities adjacent to existing services to encourage linked trips and to ensure that facilities are accessible to all local residents.

The Community Forum supports Development Plan Objective *Voluntary and Community Groups CDP10.3* where it is an objective of the County Council to support the empowerment of individuals and groups in communities through volunteering and active engagement.

The Community Forum support Development Plan Objective *Community Facilities CDP10.7* where it is an objective of Clare County Council:

- "a) To promote and encourage optimum usage of the large number of community facilities across the County;
- b) To update the inventory of community, social and cultural facilities throughout the County within the lifetime of this Plan;
- c) To encourage, advise and assist community groups wishing to provide community facilities in their area; and
- d) To ensure that sufficient lands are zoned for community use to meet the demands of the projected population during the lifetime of this Plan."

The Community Forum supports Development Plan Objective *Physical Recreation and Active Living CDP10.10* in respect of support to and expansion of the Slí na Sláinte network in

County Clare that promote/organise walking, cycling and other recreational activities and to increase sport and physical activity participation in the County, to support the development of cycle-parking facilities at appropriate locations in all urban areas in the County, and to ensure that new recreation facilities/amenities are based on the principles of sustainable development.

The Forum also supports Development Plan Objective *Recreational Routes CDP10.11* which seeks to:

- "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 the West Clare Railway Greenway and necessary supporting infrastructure;
- 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."

Under Section 10.19 it is stated that "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." We believe that Newmarket on Fergus should be added to this list.

The Community Forum also supports objectives set out in relation to Social Infrastructure; Arts, Culture and Language; Physical Recreation and Active Living; Recreational Routes; Countryside Recreation; Public Rights of Way; Play Facilities; and Dual Use of Community Facilities.

The Community Forum supports Development Plan Objective: (Community Activity) CDP17.12 which states that the County Council will seek:

"To encourage and support the work of community groups in the maintenance, enhancement and renewal of towns and villages across the County in line with CDP Objective 3.1."

11.0 Aligning Tourism Objectives (Strand 3 of the Community Forum Plan)

The tourism objectives in the Draft County Plan are split across two chapters, namely Chapter 6 under *Economic Development'* and in *Chapter 9* under *Tourism*. Please see above for comments on Chapter 6 and as follows for Chapter 9.

The Community Forum supports the vast majority of objectives and statements in relation to Chapter 9 (Tourism).

The Community Forum supports Development Plan Objective: Activity and Adventure Tourism CDP9.8:

- "a) To work with local communities and relevant agencies to achieve the sustainable development of County Clare as a world-class destination for sports and recreation-related tourism development;
- b) To support the development of low-impact experiential tourism in order to diversify the range of tourist activities available in the County at appropriate locations, subject to an analysis of their potential environmental impact and in order to expand the tourist season;
- c) To support the sustainable development of water sports, surfing, sailing and waterrelated events at appropriate locations in the county, subject to analysis of their potential environmental impact;
- d) 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;

- e) To promote activity tourism subject to appropriate site selection and environmental assessment processes; and
- f) To ensure the siting of Blue and Green Infrastructure is carefully considered in the context of climate change resilience and flood protection."

CDP9.8 should be augmented with reference 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.

As indicated elsewhere in this submission 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. Among these are the 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.

We would urge the County Council to present a consolidated map of walking and or cycle routes for what is a dynamic and growing sector of the tourist economy. The potential for Greenways is completely underestimated in the emerging Plan.

May of County Clare

Clare

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Figure 2: Newmarket on Fergus in Geographical Context of Recreational Routes and Destinations

The Community Forum supports Development Plan Objective Arts, Crafts and Food Tourism CDP9.11 where it is an objective of Clare County Council: "To support the development of the

arts, crafts and food tourism sectors and work in coordination with relevant stakeholders to facilitate growth in these sectors."

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."

Our client supports the acknowledgment of the importance of niche tourism markets set out in 9.2.19.

12.0 Delivering Infrastructure and Environmental Enhancement (Pillar 4 of the Forum Plan)

The key objectives set out in the Community Forum's Plan under this strand include:

- Working with the County Council to improve footpaths, lighting, litter management, parking, bus shelters, traffic calming and improved village aesthetics.
- Work to improve the accessibility of services.

Key amongst infrastructure and environmental enhancement include:

- A facelift for the town library;
- Parking barrier at Tradaree to avoid dangerous parking / parking which is not suitable
 to the improvement of the town core at junction starting at O'Neills public house;
- One new car park in the vicinity of the National School, soccer pitch and Garda Station including pull in area for buses and bus shelter;
- Footpath upgrades;
- New street lights;
- Support to the development of a Greenway/cycleway;
- · Litter initiatives; and
- New signage advising of speed limits in the town.

In this context CDP10.5 is relevant and is supported by the Community Forum. Development Plan Objective *Inclusivity and Equal Access CDP10.5* states that it is an objective of Clare County Council:

- "a) To promote social inclusion by implementing best practice in universal accessibility and design;
- 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;
- c) To work with representative organisations to ensure that investment in infrastructure and facilities is appropriately informed with regard to accessibility issues;
- d) To take all required steps to ensure compliance with the Disability Act 2005; and
- e) To support the upgrade and extension of existing pedestrian provision and public lighting facilities in existing urban areas to further promote walking, cycling and active travel."

13.0 Amendments and Proposals for the Newmarket on Fergus Settlement Plan (Volume 3 of the Draft County development Plan)

The Community Forum welcomes the Settlement Plan for the town as set out in Volume 3 of the emerging plan.

Within the 'Location and Context' section as part of the Town Settlement we would request the insertion of the following text:

"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." That Community Plan is attached to this submission.

Under the Section entitled 'Employment and Enterprise' we would ask that the local planning authority include reference to the town being located within the Atlantic Economic Corridor and a short distance away from the Limerick Shannon MASP. We would request also that reference to the unsurpassed access to the N18 is also highlighted.

We support the following objective already stated in this Section of the Draft Plan: "To promote enterprise and indigenous employment generating development in the town." We would add the following objectives:

- 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 Kilm]nasoolagh 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

We request reference to the following which are shown in our suggested amendments to the town zoning map that also contains reference to proposals and objectives.

- 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.

These opportunities and suggested amendments are identified in Figure 5 below.

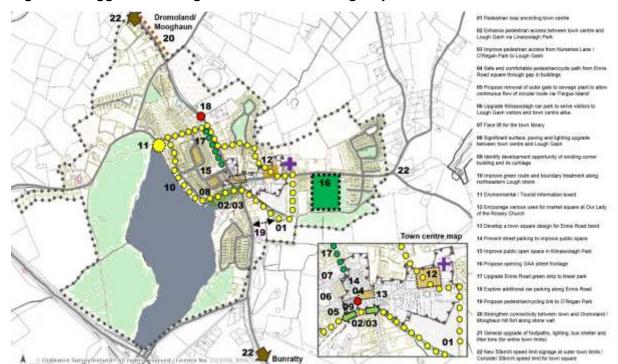


Figure 3: Suggested Changes to the Town Zoning Map

The local authority may wish to mention in this section of the emerging County Development Plan that the Community Forum are undertaking a masterplan for the town centre.

Placemaking and Regeneration

Under this section we suggest 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).

We also suggest 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.

The existing town library will be upgraded.

Architectural Conservation Area (ACA)

As indicated above the Community Forum support this designation.

Open Space

The Community Forum acknowledge that Newmarket on Fergus is well provided for in terms of recreation space and informal open space which is accessible to the public. However, as acknowledge by the local authority pedestrian access to the lake from the town centre needs to be greatly enhanced.

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). This is believed to be in Clare County Council ownership.

As indicate above proposed works to this area, 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.

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.

14.0 Conclusions

On behalf of our client, we request that the contents of this submission are given careful consideration in regard to the formulation of the Clare County Development Plan 2023-2029.

Our client would be happy to discuss the contents of this submission further with the Local Authority.

The key points from this submission are:

- The town is uniquely served by community groups and volunteers who have achieved much by way of service provision, environmental upgrade, community integration etc.
- The town is uniquely located on the strategic road network being located conveniently located close to Limerick city, Shannon Airport and Ennis.
- It has increasing potential to be accessed on the emerging cycle and walking network that is developing within the county.
- The town is unique in its ability to provide access for cyclists and pedestrians over the
 private motor vehicle. There is a need to enhance public transport given the towns
 location on the strategic road network and its proximity to other more established
 tourism attractions.
- The town is seeking to achieve the status of a Service Town to improve its service provision, increase retail and to enhance its prospects for service utility retention and provision.
- The town is also seeking inclusion within the Limerick Shannon MASP area.
- The town is developing a dynamic niche based on food provision and tourism that is unique in terms of its breadth and quality.
- The Community Forum seeks 'digihub' status for the town.
- The Forum encourages the development of activity based tourism around walking, cycling, events related to food&beverage, medieval re-enactments, castle tours and golfing tourism
- The forum envisages to improve the town centre by creating a comfortable and safe public realm environment with various amenities for residents and visitors
- A suite of environmental and infrastructural projects are commended to the County Council for incorporation within the Newmarket on Fergus Settlement Plan contained within Appendix 3 of the Draft County Development Plan.

We ask that we are included on any mailing list that is created to provide updated on the plan making process (eprenter@csrlandplan.ie).

We trust the above will be taken into account in your further deliberations on the emerging County Development Plan 2023-2029.

If further elaboration is required, please do not hesitate to contact us.

Yours sincerely,

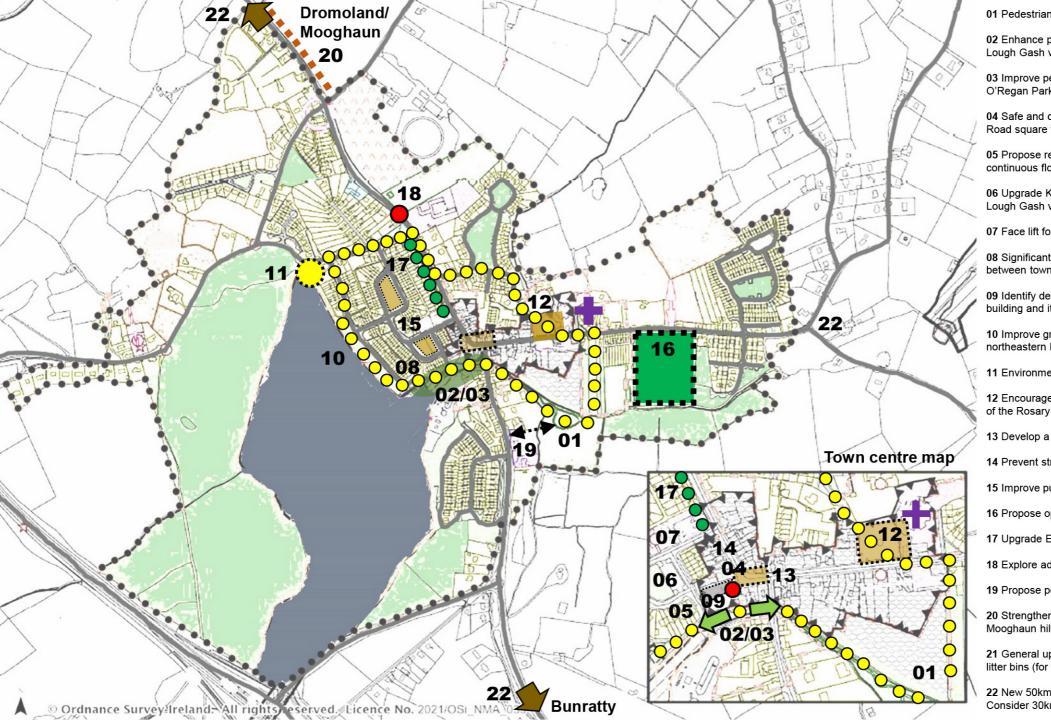
Principal Planner and Director

CUNNANE STRATTON REYNOLDS

Kanon Lenta.

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- 01 Pedestrian loop encircling town centre
 - 02 Enhance pedestrian access between town centre and Lough Gash via Linasoolagh Park
 - 03 Improve pedestrian access from Nurseries Lane / O'Regan Park to Lough Gash
 - **04** Safe and comfortable pedestrian/cycle path from Ennis Road square through gap in buildings
 - **05** Propose removal of outer gate to sewage plant to allow continuous flow of circular route via 'Fergus Island'
 - **06** Upgrade Kilnasoolagh car park to serve visitors to Lough Gash visitors and town centre alike
 - 07 Face lift for the town library
 - **08** Significant surface, paving and lighting upgrade between town centre and Lough Gash
 - 09 Identify development opportunity of existing corner building and its curtilage
 - 10 Improve green route and boundary treatment along northeastern Lough shore
 - 11 Environmental / Tourist information board
 - 12 Encourage various uses for market square at Our Lady of the Rosary Church
 - 13 Develop a town square design for Ennis Road bend
 - 14 Prevent street parking to improve public space
 - 15 Improve public open space in Kilnasoolagh Park
 - 16 Propose opening GAA street frontage
 - 17 Upgrade Ennis Road green strip to linear park
 - 18 Explore additional car parking along Ennis Road
 - 19 Propose pedestrian/cycling link to O'Regan Park
 - 20 Strengthen connectivity between town and Dromoland / Mooghaun hill fort along stone wall
 - 21 General upgrade of footpaths, lighting, bus shelter and litter bins (for entire town limits)
 - 22 New 50km/h speed limit signage at outer town limits / Consider 30km/h speed limit for town square