

SUBMISSION to Consultation on proposed Clare County Development Plan 2022 -2028

On behalf of Kilkee Tourism Ltd

General Comments

1. We are disappointed with the general thrust of the present draft. We had been looking forward to a fresh vision to somehow turn the tide of the catastrophic population drop in Kilkee. Instead we got what is largely a copy and paste of the previous development plan. Take for example Opportunity sites: OP1, OP2, OP3. The Ocean Cove Hotel and St James' Church have both received planning to convert to holiday homes and apartments. OP3 is a carpark used by Clare Co council for storage.
2. ACA. The theory of an Architectural Conservation Area is a progressive idea. However in Kilkee it is not moderated and in the last five years has seen one new build, a number conversion of business premises to residential and vice versa within the designated area without planning permission.
3. Holiday Homes. In the previous plan, CDP4.13, it states that Kilkee has an oversupply of holiday homes and that it will permit new residential development for permanent occupancy only. During the lifetime of that plan over 40 holiday homes and apartments received planning permission.
4. Mobile Homes. There is now a ring of holiday home parks around the town of Kilkee with almost 1200 vans. This is gross over development and no further increase in numbers should be allowed. Another development which is going to cause future problems is the private sale of the mobile home stand. People who buy these stands treat them as a house site and some have developed little cottage-type structures.
5. Towards a Better Kilkee. This study was very relevant when it was written with a lot of local support and input. Now with only a year left most of its recommendations should have been implemented. It is time to set up a Town Centre Renewal Plan with representatives from Kilkee Chamber, Kilkee Civic Trust, Kilkee town team and other interested groups and individuals, and proceed to implement it straightaway.
6. Traffic management Plan. The old plan from the 1990s is now obsolete. What is now required is a new plan, in consultation with local interested parties, which will be implemented in full in the life of this plan. The area is quite small and does not require much time and effort.
7. The old town reservoir in Lislalahan on the outskirts of Kilkee Town has lain unused for many years. It was once popular area for fishing (restocked annually), walking and general leisure use. It was contaminated with asbestos waste and is now a no go area. It would be a very progressive step if this area with it's rich biodiversity was brought back into public use.

8. It is essential that a vacant site levy be introduced. One house in O'Connell St has lain boarded up for over 40 years. There are many other sites which could be included.
9. Renewable Wind Strategy. The 'Not Normally Permissible Area' around Kilkee should be extended to Poulnasherry Bay, a Natura 2000 area.
10. Protected Structures. The draft list is identical with the previous list. There was to be one addition. I (personally) received a letter from Clare Co Planning Office stating that it was going to include the old Kilkee Courthouse in the new list. This was a welcome inclusion. It is not in the draft. Why not? Did someone not want it included
11. Protected Structures: Bishop's Island, RPS 238. The rating of this structure is listed as local. It is most certainly – national. It is a recorded monument with two early Christian oratories
12. R5 contains a recorded monument. Twenty metres away the site of another recorded monument (cillín) was granted planning permission for a house.

Specific Topics.

Location and Context: General Objectives

To support the development of the West Clare Railway Greenway with a trail head in the old Kilkee railway station as a distribution centre for walking and cycling tourists in the Loophead peninsula.

To encourage the further development of the retail, commercial and service sector in the town centre. To this end commercial premises in the recognised commercial centre namely OCurry St, O'Connell St., southern end of Circular Road, should only be permitted change of use for another commercial activity.

To facilitate the development of enhanced overnight motorhome / camper van facilities in Kilkee. It is important that this is tightly controlled to avoid loopholes to be exploited by mobile home park developers

Employment and Enterprise: General Objectives

To encourage local entrepreneurship by developing a business culture through specific courses at the Community College.

OP1 Bank of Ireland. A prominent protected structure in the middle of OCurry St., it's potential use could involve retail, accommodation or hospitality.

OP2 Waterfront Building. A closed bar and nightclub for over twenty years. It very prominent position in the town would lend itself to numerous commercial opportunities.

OP3. The old Erin Arms site on No 1 Erin St. This site has been idle for over 40 years and Clare Co Council has had to remove a dangerous building on the site and re-roof the two storey closed-up bar premises

ENT1 and ENT2 Enterprise Lands: General Objectives,

ENT1 To convert this factory (which is now dilapidated) into a number of small scale units to encourage local small-scale employment opportunities in suitable workshops for arts, crafts, light engineering, and technology start-up.

Town Centre

To revitalise the commercial heart of the town by developing and implementing a town centre renewal plan. Commercial premises will not be allowed change of use unless it is another commercial enterprise. Every business that closes means a loss of footfall, resulting in the reduction of business to the remaining premises.

Tourism

TOU1: Motorhome/camping for touring clients only, with limitation on stay.

TOU3 and TOU5 should be deleted and left as agricultural areas as in the present plan.

TOU3: This site in the draft states that is zoned for expansion of tourist accommodation. The only tourist accommodation which will fit in the site is mobile homes which this development plan will limit.

TOU5: Why was this very large site re-zoned for tourism? It could only be used for a large holiday home development or a large mobile home park both of which have been ruled out in the new plan. Cui bono?

Housing and Sustainable Communities.

During the lifetime of the plan permission will only be given for houses or apartments for permanent occupancy only. Permanent occupancy will be enforced by a rigorous clawback system. Affordable housing is essential and should take immediate priority.

Place Making and Regeneration.

It is an objective of the Council to introduce a Vacant Site Levy.

To promote sustainable and compact growth in the town to address issues of vacancy and dereliction. This WILL include the development of a Town Centre Renewal Pilot Programme for vacant and derelict commercial and residential properties in the town with a focus on getting these back into sustainable use.

Transport and Movement.

T3.Bay View/Stella Maris Corner

The Council shall develop a roundabout at this most dangerous crossing

Transport, Active Travel and Connectivity

“Bus Eireann and Local Link provide a regular bus service to and from Kilrush and Ennis. This service provides an alternative to the private car for residents and visitors and encourages a modal shift to a more sustainable transport option.” Local link should not compete with Bus Eireann on any route.

“To prioritise the development of the West Clare Railway Greenway and facilitate an initial Kilrush to Kilkee pilot project in line with Strategic Priority 15 ‘Prioritise the development of the West Clare Railway Greenway’ of the County Clare Tourism Strategy 2030.” To establish a trail head in the old Kilkee railway Station to be developed as a walking and cycling hub for the Loophead Peninsula.

We hope that Clare County planning Office will give careful consideration to our submission and take the proposals on board. We look forward to engaging with Clare Co Council personnel.

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V15KP22