



Clare County
Development Plan
2023-2029

Draft Clare CDP 2023-2029 - Public Consultation Portal

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Volume 1

Core Strategy, Settlement Strategy and Housing

Volume 3(a) Ennis Municipal District Written Statements and Settlement Maps

Volume 3(b) Shannon Municipal District Written Statements and Settlement Maps

Volume 3(c) Killaloe Municipal District Written Statements and Settlement Maps

Volume 3(d) West Clare Municipal District Written Statements and Settlement Maps

Lisdoonvarna

Associated Documents

None of the above

Environmental Reports

None of the above

Your Submission

Location Map



Earthstar Geographics | Esri, FAO, NOAA

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**Submission to the Draft
Clare County
Development Plan 2023-
2029**

Lands at Rathbaun
Lisdoonvarna, Co. Clare





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1. INTRODUCTION

We note that Clare County Council are in the review process of the existing Clare County Development Plan 2017-2023 and the preparation of a new development plan for the period 2023-2029 is underway. On behalf of our client Singapore Land Holdings, we wish to make a submission in respect of the Stage 2 (Draft) of the Clare County Development Plan 2023-2029 (hereinafter referred to as the Draft Plan) which was published on the 10th December 2021 and will be on public display until the 28th of March 2022. This submission pertains to lands at Rathbaun, Lisdoonvarna, Co. Clare.

2. SITE LOCATION & CONTEXT

2.1 Site Location

The subject lands are located in the town of Lisdoonvarna, Co. Clare, to the east of Main Street and north of the Dun Breandan residential development. The extent of the subject lands is illustrated in Figure 1 below (indicative only).



Figure 1 - Site Location (Site outlined in red – indicative only)

2.2 Site Context

The lands extend to approximately 3.6 Ha and form a flat, elevated plateau which is accessed via St. Brendan’s Road to the south. The lands are abutted to the west by the commercial premises which make up the eastern side of Main Street as well as the St. Enda’s National School, and to the south by the Dun Breandan and Toureen residential developments. To the north and east of the lands are agricultural fields.

2.3 Amenities & Community Facilities

The subject lands are located within immediate proximity to all of the services, amenities and community facilities located in Lisdoonvarna including:

- St. Enda’s National School
- Mary Immaculate Secondary School
- St. Breckan’s GAA Club
- Burren United FC
- Local Playground
- Commercial and other Services located on Main Street

The proximity of the subject lands to these locations is illustrated in Figure 2 below. The GAA Club, Soccer Club and Playground provide an excellent community and amenity facility and are located an approx. 300 metre or 5-minute walk from the subject lands. The commercial and other services located on Main Street are less than a 5-minute walk from the subject lands.

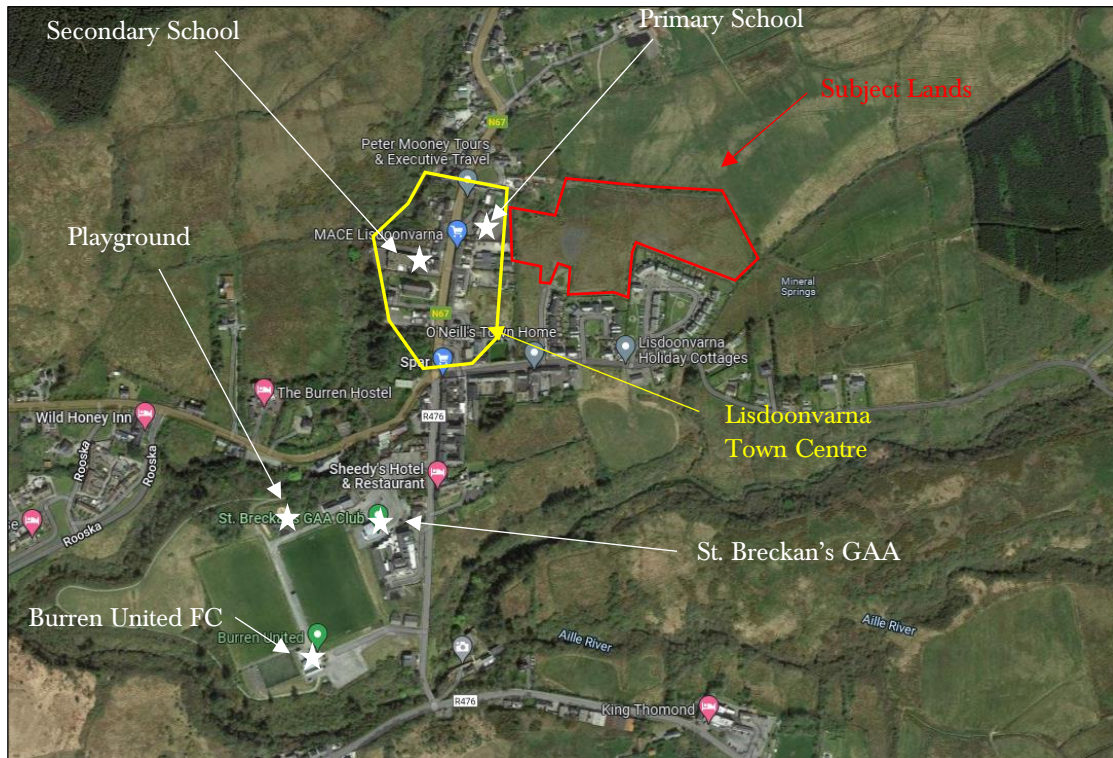


Figure 2- Proximity to Amenities and Facilities

2.4 Connectivity

Vehicular access to the lands is provided by St. Brendan's Road. This in turn links that lands to the R467/N67. The lands have pedestrian connectivity to the south via the footpath on the St. Brendan's Road. There is also the potential to provide pedestrian connectivity to the Toureen residential development to the south and to Main Street to the West.

2.5 Services

We understand that there is a foul sewer and public water supply located in the St. Brendan's Road and that there is adequate capacity in the Lisdoonvarna Wastewater Treatment Plant to cater for the proposed development.

3.

PLANNING HISTORY

A review of Clare County Council’s online planning register indicates that there are 2 no. pertinent planning permissions in respect of the subject lands. There are currently no extant planning permissions on the subject lands.

Table 1 - Planning History

Planning Ref Number	Applicant	Development Description	Decision
09/1237	Tom & Fiona McNamara	An extended 10-year Permission for development consisting of the construction of 5 no. single-storey detached dwelling units and 20 no. two-storey detached dwelling units (all with options on size and configuration subject to subsequent agreement with the Local Authority) and all associated ancillary site development works including site access, circulation, boundary and landscaping treatments as well as all utility services connections	Grant of permission 23 rd May 2010
15/188	Fiona McNamara	Extension of Duration of Pl. Ref. No: 09/1237	Grant of permission 19 th May 2015 (permission expired 2018)

The Planning Authority will note that the subject lands had the benefit of planning permission for a period of 8 no. years between 2010-2018. The permitted development comprised a high quality 25 no. unit residential development as illustrated in Figure 3 below. Unfortunately, the duration of the planning permission coincided with the wider economic downturn, and it was not possible to deliver the development during the lifetime of the relevant planning permissions.



Figure 3 - Previously Permitted Layout

4. PLANNING POLICY CONTEXT

This submission has been prepared having due cognisance of the following planning policy documents:

- National Planning Framework: Project Ireland 2040
- Regional Spatial & Economic Strategy for the Southern Regional Assembly 2020- 2032
- Clare County Development Plan 2017-2023 & Draft Clare County Development Plan 2023-2029

4.1 National Planning Framework

In 2018, the Government of Ireland adopted the National Planning Framework (NPF) entitled Ireland 2040 to succeed the National Spatial Strategy. The NPF comprises the Government's proposed long-term strategic planning framework to guide national, regional and local planning and investment decisions over the next 25 years. It is intended that the NPF will be a strategic document that will provide the framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy. The NPF has a number of National Policy Objectives (NPOs) that articulate delivering on a compact urban growth programme and are relevant to the proposed rezoning of the subject lands.

- NPO 1b relating to population growth in the region, with 340,000 to 380,000 additional people to 2040;
- NPO 3a: Deliver at least 40% of all new homes within the built-up footprint of existing settlements
- NPO 4 relating to attractive, well-designed liveable neighborhoods;
- NPO 5 relating to sufficient scale and quality of urban development; and
- NPO 6 relating to increased residential population and employment in urban areas.
- NPO 33 prioritise provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location

There is a very significant population growth allocated to the Southern Region in which Lisdoonvarna is located – 340,000 to 380,000 people up to 2040. In order to facilitate this population growth there will be a requirement to develop large numbers of new houses and apartments in the region. It is important the more sustainable patterns of development are pursued particularly in the context of achieving more compact urban growth. The subject lands are effectively located in the town centre and would be a desirable location for new residential development.

4.2 Regional Spatial & Economic Strategy

The Regional Spatial & Economic Strategy for the Southern Region 2020-2032 (RSES) was adopted on 31st January 2020. The purpose of the RSES is to support the implementation of the National Planning Framework and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region. The RSES recognises the importance of smaller towns and villages in delivering the overarching objectives of the Strategy and the National Planning Framework as per the extract below:

The future role and function of our large network of smaller towns and villages across the region need to be re-imagined, addressing economic, physical and social decline issues. The regeneration of our smaller towns and villages is now a major priority action for our region, which provides an opportunity to address legacy issues and to turn around their fortunes. The health of our villages and towns can be significantly influenced through the delivery of new housing through the utilisation of existing buildings, brownfield/infill sites or otherwise. The NPF target for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites is an important opportunity for our smaller towns and villages to be re-imagined and therefore it is included as a key objective.

It is considered that the delivery of housing on the subject lands would assist in providing a resident population in immediate proximity to the town centre which would assist in maintaining the vitality and viability of the commercial and other service uses in the town centre.

4.3 Clare County Development Plan 2017-2023

The lands are currently zoned Mixed Use, Residential and Low Density Residential in the Clare County Development Plan 2017-2023 as illustrated in Figure 4 below.

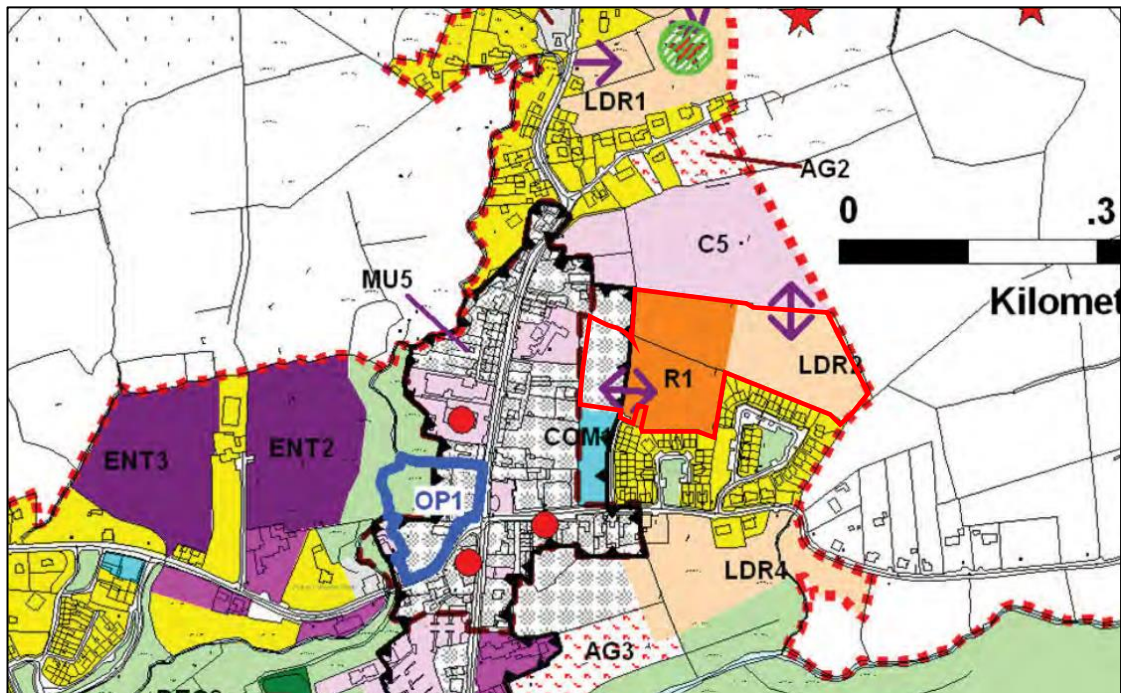


Figure 4 - Current Land Use Zoning (Lands Outlined in Red)

4.4 Draft Clare County Development Plan 2023-2029

The lands are proposed to be zoned Mixed Use, Residential and Strategic Reserve in the Draft County Development Plan 2023-2029 as illustrated in Figure 5 below. The subject lands are outlined in red. It is noted that the proposed zoning alters significantly the proposed land use zoning of the eastern portion of the lands from ‘Low Density Residential’ to ‘Strategic Reserve’.

It is noted that the Draft Development Plan states the following in respect of the ‘Strategic Land Reserve’ zoning:

‘It is acknowledged that not all lands within the settlement boundaries of the serviced settlements will be required to 2029. In these cases some lands have been included as a strategic residential reserve, where they comprise infill or contiguous sites or have a planning history of residential use and can form part of the long-term sequential expansion of the settlement where considered appropriate.

The development of such lands will only be considered from the beginning of year four of the Plan (April 2027) in order to give an opportunity for zoned land to be brought forward for development, and where it can be clearly demonstrated to the satisfaction of the planning authority that a zoned parcel of land will not be brought forward for development due to infrastructural or other demonstrable constraints during the remaining period of the Plan.’

This land use zoning effectively sterilises the eastern portion of the lands for development up to April 2027 at the earliest and more likely, until the adoption of the next County Development Plan. This zoning submission seeks an amendment to the proposed zoning and more information in relation to this is set out in Section 6 below.

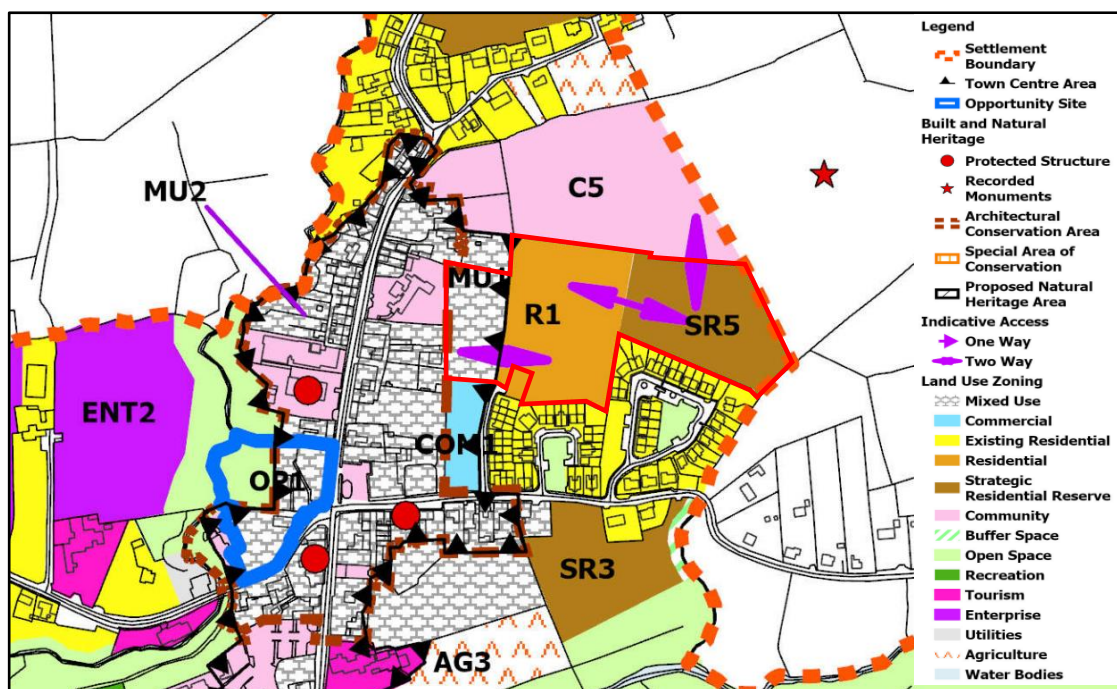


Figure 5 - Draft Development Plan Zoning (Lands outlined in Red)

5. ASSESSMENT OF SUBJECT LANDS

The purpose of this section is to provide an assessment of the subject lands against the criteria utilised by Planning Authorities in the identification of appropriate land for new residential development and as set out in Section 4 of the – *Development Plans: Guidelines for Planning Authorities 2007* published by the Department of Housing, Local Government and Heritage. The key criteria from this document will be set out below and an assessment of the proposed development provided against same. These criteria are as follows:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure & Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage Policy

In the interests of conciseness an abridged version of the narrative set out in the Guidelines is provided below. It is also noted that the Department of Housing, Local Government and Heritage published a draft of an updated *Development Plan Guidelines for Planning Authorities* in August 2021. It is considered that the subject lands meet the criteria set out in the draft document as they relate to the zoning of lands for residential development.

5.1 Need

The Guidelines state the following in respect of need:

'The amount of land to be zoned for any particular land-use must be clearly based on, and justified by, a realistic assessment of need. The survey and analysis stage of plan preparation should provide the baseline data to determine future land requirements. A number of factors need to be taken into consideration when determining the location and quantity of land to be zoned.'

5.1.1 Assessment

The Core Strategy included in the Draft Clare County Development Plan identifies a population increase for the town of Lisdoonvarna over the duration of the upcoming development plan and an associated residential land zoning requirement. It is considered that there is an identified need for new residential development in the settlement.

5.2 Policy Context

The Guidelines state the following in respect of Policy Context:

'Both the amount of land to be zoned for development and the proposed location of that land will also need to be influenced by other plans and strategies, from national and regional to local levels so that local authorities play their full part in supporting the implementation of those national and regional strategies.'

5.2.1 Assessment

As outlined in the preceding section it is considered that the national and regional planning policy context are supportive of the development of the subject lands. These policy documents provide a very clear direction in relation to the requirement to accommodate population growth within existing settlements in the coming years. The zoning of the subject lands and their beneficial development in terms of providing housing would accord with the relevant national and regional planning policy context.

5.3 Supporting Infrastructure & Facilities

The Guidelines state the following in respect of Supporting Infrastructure & Facilities:

‘Consideration must be given to the future availability of, or the capacity to provide, supporting infrastructure, such as community facilities, health-care, schools, public open space, retail and other service provision and public transport when allocating land for development.’

5.3.1 Assessment

The lands are serviced by the public sewer and the public water supply. There are also a wide range of services, amenities and community facilities located in immediate proximity to the subject lands (see Figure 2 above).

5.4 Physical Suitability

The Guidelines state the following in respect of Physical Suitability:

‘The development plan should strive to ensure that the form and location of new development offers the best “value for money” in terms of efficient use of existing infrastructure, while minimising the need for costly new infrastructure. Where land in green-field locations is to be zoned, account should be taken, in considering the different options available, of the land’s capacity for development by way of the most cost-effective means of providing the necessary infrastructure.’

5.4.1 Assessment

The lands are relatively flat and have been the subject of a previous grant of planning permission for residential development. There is also pedestrian and vehicular access to the subject lands.

5.5 Sequential Approach

The Guidelines state the following in respect of the Sequential Approach:

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:

- (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. ‘leapfrogging’ to more remote areas should be avoided);*
- (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands;*
- (iii) Areas to be zoned should be contiguous to existing zoned development lands.*

5.5.1 Assessment

The subject lands immediately adjoin Lisdoonvarna Town Centre and are therefore considered to be the most appropriate location for new residential development in the settlement.

5.6 Natural Heritage

The Guidelines state the following in respect of Natural Heritage:

‘Local authorities have a key role to play in regard to preserving the natural heritage of their areas arising from the legal responsibilities placed on them and from the increasing public awareness of the importance of nature conservation at local level. In doing so they should also avail of opportunities that may arise to create or promote new features of biodiversity in the context of new developments.’

5.6.1 **Assessment**

A desktop review indicates that the subject lands are not the subject of any environmental or ecological constraints or designations.

6. SUBMISSION

On behalf of our client, Singapore Land Holdings, we respectfully request that the entirety of our client’s lands outlined in red in Figure 6 below are zoned ‘Residential’ in the Clare County Development Plan 2023-2029.

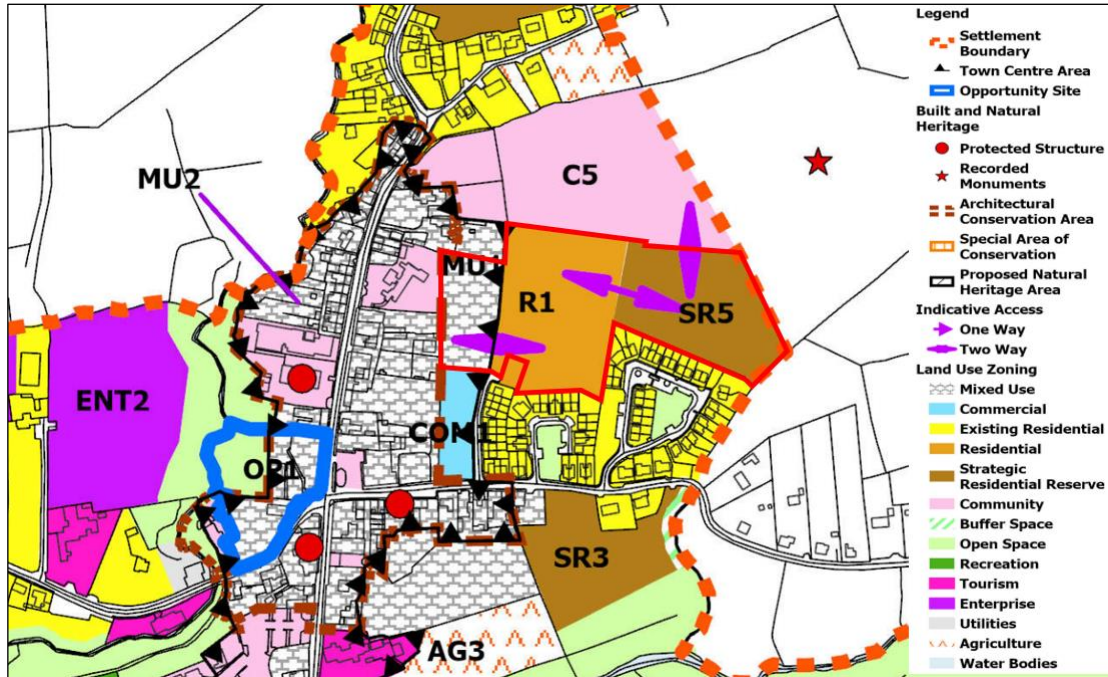


Figure 6 - Submission

For the reasons outlined in the preceding Sections, it is considered that the sterilisation of the eastern portion of the subject land until at least 2027, by zoning them ‘Strategic Reserve’ (SR5), does not represent a sustainable use of prime residential development land. These lands are suitable for residential zoning based on the provisions of national and regional planning policy and the provisions of the *Development Plans: Guidelines for Planning Authorities 2007* and the *Draft Development Plans: Guidelines for Planning Authorities 2021*.

The Mixed-Use zoning on the western portion of the subject lands is noted and the aspiration to provide a degree of commercial/retail development to complement a future residential development on Site’s R1 and SR5, and the existing residential development to the south, is understood. It is noted however that this western portion of the subject lands shares the same zoning objective as the Main Street despite being somewhat disjointed and physically disconnected from it. The desirability of this section of the site in terms of commercial viability for retail and other use mixes is potentially questionable. However, it is noted that the zoning matrix in the Draft County Development Plan states that a range of commercial/retail and other development types are ‘*Open for Consideration*’ on the Residential Land Use zoning. It is considered that any future residential development proposal on the subject lands could include for some degree of commercial/retail development at an appropriate and commercially viable scale, while still incorporating residential uses on the area of the site currently zoned Mixed Use.

7.

CONCLUSION

In summary, the main considerations for the proposed rezoning of the subject lands from a mixture of uses to entirely 'Residential' are as follows:

- The subject lands are located within the settlement boundary of Lisdoonvarna
- The lands benefit from excellent pedestrian connectivity to the surrounding area.
- There are a range of amenities and community facilities located within easy walking distance of the subject lands.
- Clare County Council have previously granted planning permission for a significant residential development on the subject lands.
- The lands benefit from access to services i.e. water and sewer.
- The Core Strategy set out in the Draft Clare County Development Plan identifies a requirement for new homes in Lisdoonvarna over the lifetime of the Development Plan. Sequentially, the subject lands represent the most appropriate location for new residential development in the settlement.
- Residential development at this location will consolidate an underutilised gap site to the east of Main Street.
- Residential development at this location would accord with National and Regional policy objectives and the criteria for zoning lands for residential development set out in the *Development Plans: Guidelines for Planning Authorities 2007* and the *Draft Development Plans: Guidelines for Planning Authorities 2021*.

We trust that the above submission will be given due consideration in the preparation of the Clare County Development Plan 2023-2029.

