



Clare County  
Development Plan  
**2023-2029**

## **Draft Clare CDP 2023-2029 - Public Consultation Portal**

**Submitted By: Anonymous user**

**Submitted Time: March 28, 2022 2:55 PM**

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Wessel Vosloo [The Planning Partnership]

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### **Volume 1**

Core Strategy, Settlement Strategy and Housing, Economic Development & Enterprise, Retail, Towns & Villages, Design & Placemaking

### **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**

Kilkee

### **Associated Documents**

None of the above

### **Environmental Reports**

None of the above

### **Your Submission**

Our Primary Request is: 1. That the Enterprise land-use zoning description as outlined under 19.4 be amended to ensure consistency with development uses which are 'open to consideration' as outlined within Appendix 2: Enterprise This zoning also allows for associated power generating infrastructure as well as transportation infrastructure such as car and bicycle parking and bus stop shelters. This zoning excludes motor sales/servicing activities and heavy industrial undertakings. Lands zoned for 'enterprise' in large villages and small villages shall be taken to include the use and development of land for small-scale business and enterprise development such as incubator units, craft centres/workshops, small-scale manufacturing, local digital/technology business etc. Retail use on these sites shall only be considered where it is complementary as part of an overall integrated mix-use development to the main activity taking place. 2. That Buffer Space zoned lands be zoned Enterprise

as presented in in document uploaded as part of this submission, while still providing an adequate buffer from the stream along the eastern boundary. As an Alternative Request: 1. That the Commercial land-use zoning description as outlined under 19.4 be amended to ensure consistency with development uses which 'will normally be acceptable in principle' as outlined within Appendix 2: Commercial The use of land zoned for 'commercial' purposes shall be taken to include the use of the lands for commercial and business uses including offices, service industry, warehousing and the facilitation of enterprise/retail park/office type uses as appropriate. Retailing will normally be acceptable in principle under this zoning, provided that a sequential test is carried out and the lands are demonstrably the optimum location for the nature and quantum of retail development proposed. 2. That the lands be zoned Commercial as presented in document uploaded as part of this submission.

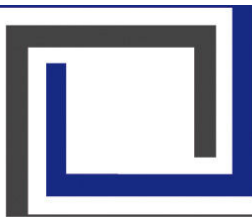
## Location Map



## Upload Files

final TPP CCDP Draft Plan Site Specific Submission Kilkee 28.03.2022.pdf,  
2.07MB





Draft Clare County Development Plan 2023-2029  
Planning Department  
Clare County Council  
New Road  
Ennis  
Co. Clare  
V95 DXP2

Monday, 28<sup>th</sup> March 2022  
[By Online submission]

Dear Sir / Madam

**RE: SUBMISSION/OBSERVATION TO THE DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029**

**Site Specific Submission/Observation, Lands at Carrigaholt/Church Road (1.7 ha), in the townland of Ballyonan or Doonaghboy, Kilkee, County Clare**

## 1.0 INTRODUCTION

### 1.1 Focus of Submission

The Planning Partnership, The Coach House, Dundanion, Blackrock Road, Cork, prepared this Submission/Observation in relation to the published *Draft Clare County Development Plan 2023-2029*.

It is acknowledged that the new Development Plan aim to achieve the recovery in response to the Covid-19 pandemic, and “*deliver on aspirations for a healthy and inclusive society with a high quality of life for all people, fostering an environment to encourage job creation, innovation and economic growth, while ensuring balanced development in our towns, villages and rural areas.*”<sup>1</sup>

It is within this context that this Submission/Observation is made, focussing on the Site Specific Policy associated with Lands at Carrigaholt/Church Road (1.7 ha), in the townland of Ballyonan or Doonaghboy, Kilkee, County Clare, and specifically:

1. The confirmation presented within the emerging *Clare County Development Plan 2023-2029* confirms the **Retail Objective** for Kilkee for the “*provision of modern convenience goods stores, of an appropriate scale, and associated retail and service units to enable these centres to meet the day to day needs of Kilkee’s local catchment population*”.
2. The draft proposal to zone the specific lands for the purposes of *Enterprise* where the use as a “Shop” as defined within the *Planning and Development Regulations 2001* (as amended) are ‘open to consideration’, which is inconsistent with the *Enterprise* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029*, which clearly excludes general retail.
3. Clare County Council’s promotion of the concept of the 10-minute town and active travel principles, all of which support green infrastructure, active living and sustainable residential development.

<sup>1</sup> Extract *Draft Clare County Development Plan 2023-2029*, Message from Councillor PJ Ryan, Cathaoirleach of Clare County Council

4. That 'Data Centre' use 'will normally be acceptable in principle', which is inconsistent with the *Buffer Space* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029*, which clearly details that such lands is to remain undeveloped land for the conservation of biodiversity, visual amenity or green space.

**Figure 1.1: Aerial image of Kilkee illustrating the Lands at Carrigaholt/Church Road (1.7 ha)**



Source: ESRI ArcGIS, Annotated and Reproduced by The Planning Partnership under licence.

Within the context of the foregoing, and as detailed further below, **we hereby request as Primary Request that:**

1. That the *Enterprise* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029* be amended to ensure consistency with development uses which are 'open to consideration' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*.
2. That some *Buffer Space* zoned lands to the immediate north of the *Enterprise* lands along Carrigaholt/Church Road (0.25 ha), be zoned *Enterprise*, while still providing an adequate buffer from the stream along the eastern boundary

**As alternative not to diminish our Primary Request as outlined above, that:**

1. The **Commercial** land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029* be amended to ensure consistency with development uses which 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix*; and
2. That the lands along Carrigaholt/Church Road (1.7 ha) be zoned *Commercial*, to act as catalyst for facilitating the Retail Objective for Kilkee for the development of a modern convenience goods store, of an appropriate scale, to meet the day to day needs of Kilkee's local catchment population, ensure the future vitality and vibrancy of Kilkee, and to act as catalyst for development to deliver the inherent opportunities presented within the objectives of the Council as outlined in the *Draft Clare County Development Plan 2023-2029*.

**2.0 ENT<sub>2</sub> ZONED LANDS AT CARRIGAHOLT/CHURCH ROAD (1.7 HA) REMAIN UNDEVELOPED IN SUCCESSIVE DEVELOPMENT PLANS, AND REQUIRES A CATALYST TO STIMULATE DEVELOPMENT**

**2.1 The proposed *Enterprise* land-use zoning designation restricts/inhibits the development potential of the key located site along Carrigaholt/Church Road, Kilkee**

The *Draft Clare County Development Plan 2023-2029* proposes that part of the Lands at Carrigaholt/Church Road in the townland of Ballyonan or Doonaghboy, Kilkee, be zoned *Enterprise*, with the following description:

***Enterprise***

*Lands zoned for 'enterprise' shall be taken to include the use and development of land for high end research and development, business science and technology-based industry, financial services, call centres/telemarketing, software development, data centres, enterprise and incubator units, small/medium manufacturing or corporate office in high quality campus/park type development.*

*It is intended that such developments will have high quality architectural design and landscaping. This zoning allows for 'walk to' support facilities such as canteen, restaurant or crèche services which are integrated into employment units and are of a nature and scale to serve the needs of employees on the campus.*

*This zoning also allows for associated power generating infrastructure as well as transportation infrastructure such as car and bicycle parking and bus stop shelters. This zoning excludes general retail, retail park outlets, motor sales/servicing activities and heavy industrial undertakings.*

*Lands zoned for 'enterprise' in large villages and small villages shall be taken to include the use and development of land for small-scale business and enterprise development such as incubator units, craft centres/workshops, small-scale manufacturing, local digital/technology business etc. Retail use on these sites shall only be considered where it is ancillary to the main activity taking place.*

*Enterprise developments in large villages and small villages must have a high standard of architecture and landscaping and must be relative and appropriate to the scale, size and character of the settlement in which they are planned to be located.*

The following land-uses 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*:

*Agricultural Business, Agricultural Tourism, Boarding Kennels, Car Park, Civic and Amenity Recycling Facility, Community Facility, Crash/Childcare Facility, Education/Enterprise Centre, Industry Light, Office <100m<sup>2</sup>, Office 100m<sup>2</sup>-1000m<sup>2</sup>, Office >1000m<sup>2</sup>, Open Space, Research and Development, School/College, Science and Technology Based Enterprise, Tourism Complex, Training Centre, CHP/Waste to Energy Facilities.*

Lands at Carrigaholt/Church Road, Kilkee, is also subject to the Site Specific Objective **ENT<sub>1</sub>**:

*These two sites have been designated for the development of enterprise and employment generating uses with a view to providing greater employment opportunities for the local community. Proposals for the expansion of existing facilities will also be considered. Any development must reserve a buffer, as indicated on the Kilkee settlement map, from the streams that run along the northwest boundary of ENT<sub>1</sub> and the eastern boundary of ENT<sub>2</sub>.*

Along the stream running to the east of the lands, and part of the norther boundary, the *Draft Clare County Development Plan 2023-2029* proposes that part of the Lands at Carrigaholt/Church Road be zoned *Buffer Space*, with the following description:

**Buffer Space**

*Buffer spaces are intended to provide a buffer of undeveloped land for the conservation of biodiversity, visual amenity or green space. Buffer spaces may include natural features such as floodplains, riparian zones, turloughs, valuable biodiversity areas including designated sites, amenity areas, woodlands, hedgerows, green spaces and archaeological features.*

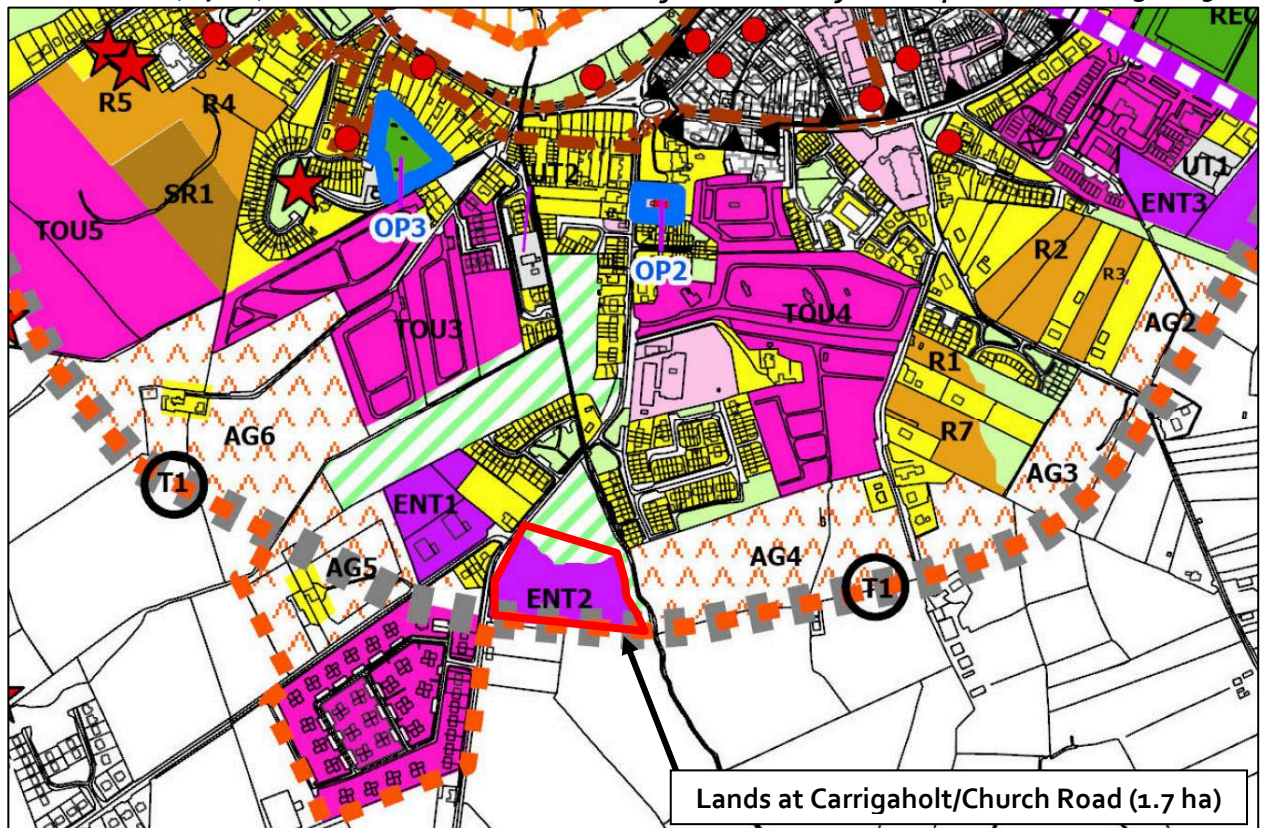
*Data Centre* is the only land-use which ‘will normally be acceptable in principle’ as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*.

It is further acknowledged that that *Volume 3b Shannon Municipal District Settlement Plans* of the *Draft Clare County Development Plan 2023-2029*, detail a **Retail Objective** for Kilkee, as follows:

*It is an objective:*

- *To support the provision of modern convenience goods stores, of an appropriate scale, and associated retail and service units to enable these centres to meet the day to day needs of Kilkee’s local catchment population.*

**Figure 2.1: ENT 1 and Buffer Space Land Use Zoning Designations as Applied to Lands at Carrigaholt/Church Road (1.7 ha) under the Provisions of the *Draft Clare County Development Plan 2023-2029***



Source: Land Use Zoning Map of the *Kilkee Draft Clare County Development Plan 2023-2029*, extracted, reproduced and annotated by The Planning Partnership under OS Licence No. AR0114722



It is our professional planning opinion that the proposed *Enterprise* land-use zoning designation restricts/inhibits the development potential of the key located site along Carrigaholt/Church Road, Kilkee, and requires a catalyst to stimulate development. It is further acknowledged that 'Shop' is only 'open to consideration' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*, which is inconsistent with the *Enterprise* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029*, which clearly excludes general retail.

It is further acknowledged that 'Data Centre' use 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*, which is inconsistent with the *Buffer Space* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029*, which clearly details that such lands is to remain undeveloped land for the conservation of biodiversity, visual amenity or green space.

## 2.2 National Planning Framework – Project Ireland

**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.*

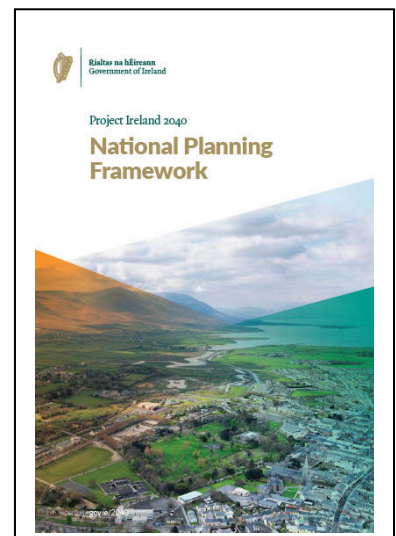
**NPO 5:** *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*

**NPO 6:** *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.*

**NPO 11:** *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

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

**NPO 28:** *Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.*

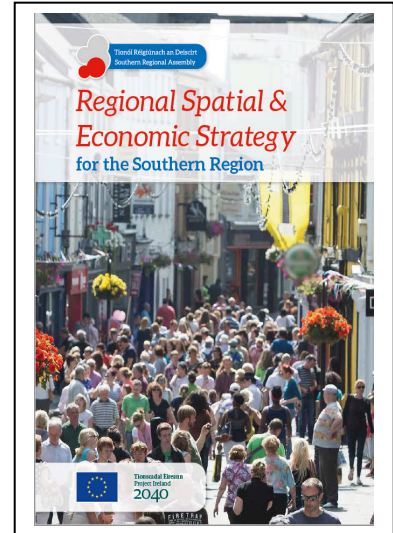


## 2.3 Regional Spatial Economic Strategy for the Southern Region

**RPO 2 Planning for Diverse Areas:** *The RSES recognises the strategic role played by all areas, both urban and rural, in achieving the set regional and national targets and objectives. The RSES supports sustainable enterprise growth, services, physical and social infrastructure investment and the sustainable growth of all communities in the Region. The overall strategy builds on cities and their associated metropolitan areas as engines of growth and seeks, in parallel, to re-position the Region's strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way to foster sustainable competitive advantage.*

**RPO 55 Retail:** It is an objective to:

- a. Improve the physical appearance, vitality and vibrancy of city centre, town centre and village locations through collaboration between Planning Authorities and Retail Traders Associations in regeneration / public realm projects and other measures;
- b. Ensure that retail development is focussed on urban and village centres with the application of a sequential approach to consideration of retail development which does not fall into this category;
- c. Prepare Retail Strategies in accordance with the Retail Planning Guidelines including Joint Retail Strategies where applicable. Proposed public realm or urban regeneration projects should be assessed for potential impacts on the receiving environment including capacity of existing services at project level. Where public realm or urban regeneration projects would significantly increase shopper/visitor numbers, planning authorities should ensure that projects include sustainable management of increased demand for access to city/town centre locations.



**RPO 62 Location for Employment Development:** It is an objective to:

- b- Identify future locations for strategic employment development having regard to accessibility by sustainable transport modes and environmental constraints.

## 2.4 Retail Planning Guidelines (2012)

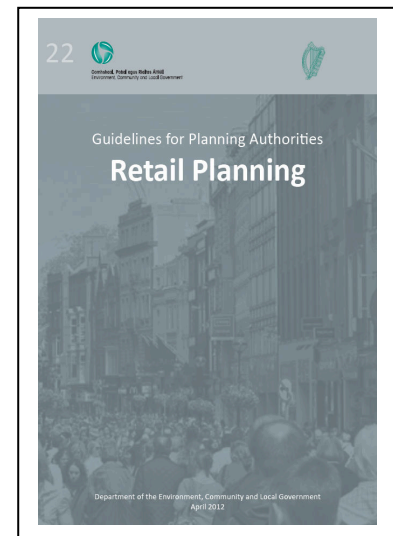
**2.5.3 Competitiveness in the Retail Sector:** Strong competition is essential to reduce retail costs and ensure that savings are passed on to retail customers through lower prices. Competition also promotes innovation and productivity.

The planning system should not be used to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting and implementing these Guidelines, planning authorities and An Bord Pleanála should avoid taking actions which would adversely affect competition in the retail market. In particular, when the issue of trade diversion is being considered in the assessment of a proposed retail development, planning authorities and An Bord Pleanála should assess the likelihood of any adverse impacts on the vitality and viability of the city or town centre as a whole, and not on existing traders.

**2.5.4 Encouraging Sustainable Travel:** While the private car tends to be attractive for activities such as more substantial convenience goods shopping or bringing home bulky goods, careful location of retail developments and attention to detail in terms of how they are connected by footpaths and cycle facilities to surrounding areas can substantially boost trips on foot or bicycle for smaller purchases and make a substantial difference in encouraging smarter travel in line with the Smarter Travel strategy.

**2.5.5 Retail Development and Urban Design:** Quality design aims to create attractive, inclusive, durable, adaptable places for people to work in, to live in, to shop in, or pass through.

Planning authorities should promote quality design in retailing in their development plan and/or retail strategies and then implement this through the development management process. This is of particular importance for retail development because of the dominant visual and use role it plays in a city, town or village streetscape.



**3.3 Development Plans and Retailing:** *The function of the development plan is to establish an overall strategy for the proper planning and sustainable development of its area.*

*Specifically in relation to retailing, the development plan must be:*

- *Evidence-based through supporting analysis and data to guide decision making;*
- *Consistent with the approach of these guidelines; and*
- *Clear and concise with regard to specific objectives and requirements.*

**5- Set out strategic guidance** *on the location and scale of retail development to support the settlement hierarchy, including where appropriate identifying opportunity sites which are suitable and available and which match the future retailing needs of the area;*

**7- Mobility management measures-** *that both improve accessibility of retail areas while aiming to develop a pedestrian and cyclist friendly urban environment and vibrant street life.*

#### **4.4 Sequential Approach to the Location of Retail Development:**

**City and Town Centres:** *The centres of cities and towns are the most suitable locations for the higher order fashion and comparison goods and are the most accessible locations for the majority of the catchment population. They should be supported in maintaining and expanding their retail offer to serve that population in a sustainable way which will also help to reduce the need to travel.*

**4.9 Retail Impact Assessment:** *However, where a planning authority considers an application for planning permission to develop a new retail development to be particularly large in scale compared to the existing city/town/district centre, or where a retail strategy or development plan has allocated a specific type and quantum of retail floorspace to a particular settlement and a proposed development absorbs on one site the bulk of that potential retail floorspace, the planning authority may request the applicant, by way of a Retail Impact Assessment (RIA) as set out in Annex 5, to demonstrate compliance with the development plan and that there will not be a material and unacceptable adverse impact on the vitality and viability of any existing centre. This is a matter for careful technical assessment and professional judgement.*

**4.11.5 Retailing in Small Towns and Villages:** *The role of small towns and villages in the provision of retail services to their local urban and rural populations should be defined in development plans. Where appropriate, the maximum size of store, consistent with maintaining a variety of shops in the centre of these towns and villages and protecting an appropriate level of retail provision in the rural area, should be identified. In general there should be a clear presumption stated in favour of central or edge-of-centre locations for new developments.*

**4.11.6 Local Retail Units:** *Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.*

### **3.0 OUR REQUEST**

Acting as a catalyst to further positive development, the *Retail Planning Guidelines 2012* state that “retailing plays a major role in attracting people to the centre of cities, towns and villages, thus contributing to the overall economic vitality of those centres and supporting their role as centres of social and business interaction in the community...”.

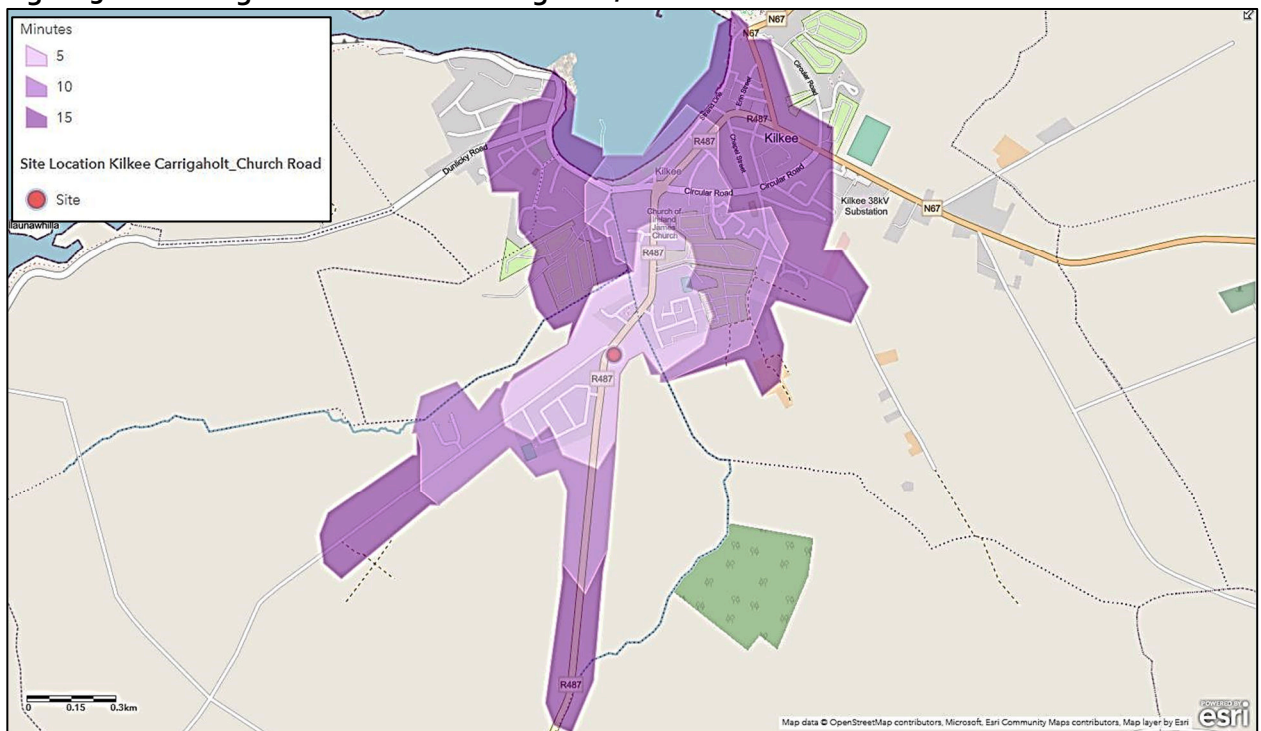
The *Retail Planning Guidelines 2012* go on to say that retailing “...also supports the considerable investment by the public and private sectors in urban renewal, by providing shopping facilities to residents and by adding to the vitality and attractiveness of inner areas of cities and towns which is important also in the context of the tourism sector”.

As Clare County Council is promoting the concept of 10-minute town concept and active travel principles, all of which support green infrastructure, active living and sustainable residential development, the development of the lands along Carrigaholt/Church Road for retail opportunities, will act as catalyst to provide adequate retail services to Kilkee catchment, and the improvement of the quality of life in Kilkee and its environs.

Figure 3.1 below presents graphically three Walking Catchment areas, i.e. a 5-minute, 10-minute, and 15-minute average speed walk, which are served by the lands along Carrigaholt/Church Road’s immediate residential catchment.

The 15-minute walking catchment in effect extends into the entire Kilkee Urban Build Form, while protecting the diverse tourism product to offer to visitors not least its rich architectural and natural heritage and its Coastal location. Kilkee has a good range of small convenience outlets but no large supermarkets. Whilst the town centre is very widely defined, the main commercial focus is on O’Curry Street, with some locally orientated provision on O’Connell Street. Whilst there are some commercial outlets on Erin Street, these are primarily hotel related.

**Figure 3.1: Walking Catchment from Carrigaholt/Church Road site in Kilkee**



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership March 2022

From a detail review of the *Draft Clare County Development Plan 2023-2029*, it appears that inconsistencies are presented within the *Enterprise* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029*, and the use as a ‘Shop’ which is only ‘open to consideration’ as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*.

The *Enterprise* land-use zoning description clearly excludes general retail.

The *Planning and Development Regulations 2001* (as amended) defines:

*'shop' means a structure used for any or all of the following purposes, where the sale, display or service is principally to visiting members of the public –*

*(a) for the retail sale of goods,*

*(b) as a post office,*

*(c) for the sale of tickets or as a travel agency,*

*(d) for the sale of sandwiches or other food or of wine for consumption off the premises, where the sale of such food or wine is subsidiary to the main retail use, and "wine" is defined as any intoxicating liquor which may be sold under a wine retailer's off-licence (within the meaning of the Finance (1909-1910) Act, 1910), 10 Edw. 7. & 1 Geo. 5, c.8,*

*(e) for hairdressing,*

*(f) for the display of goods for sale,*

*(g) for the hiring out of domestic or personal goods or articles,*

*(h) as a launderette or dry cleaners,*

*(i) for the reception of goods to be washed, cleaned or repaired,*

*but does not include any use associated with the provision of funeral services or as a funeral home, or as a hotel, a restaurant or a public house, or for the sale of hot food or intoxicating liquor for consumption off the premises except under paragraph (d), or any use to which class 2 or 3 of Part 4 of Schedule 2 applies;*

As noted from the above, it is clear that 'Shop' presents retail activities/uses which are 'open to consideration' on *Enterprise* zoned lands as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*.

**Accordingly, our Primary Request the subject of this submission/observation is:**

1. That the *Enterprise* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029* be amended (**additional text in red** with text to be omitted ~~striketrough~~) to ensure consistency with development uses which are 'open to consideration' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*, as follows:

### **Enterprise**

Lands zoned for 'enterprise' shall be taken to include the use and development of land for high end research and development, business science and technology-based industry, financial services, call centres/telemarketing, software development, data centres, enterprise and incubator units, small/medium manufacturing or corporate office in high quality campus/park type development.

It is intended that such developments will have high quality architectural design and landscaping. This zoning allows for 'walk to' support facilities such as canteen, restaurant or crèche services which are integrated into employment units and are of a nature and scale to serve the needs of employees on the campus.

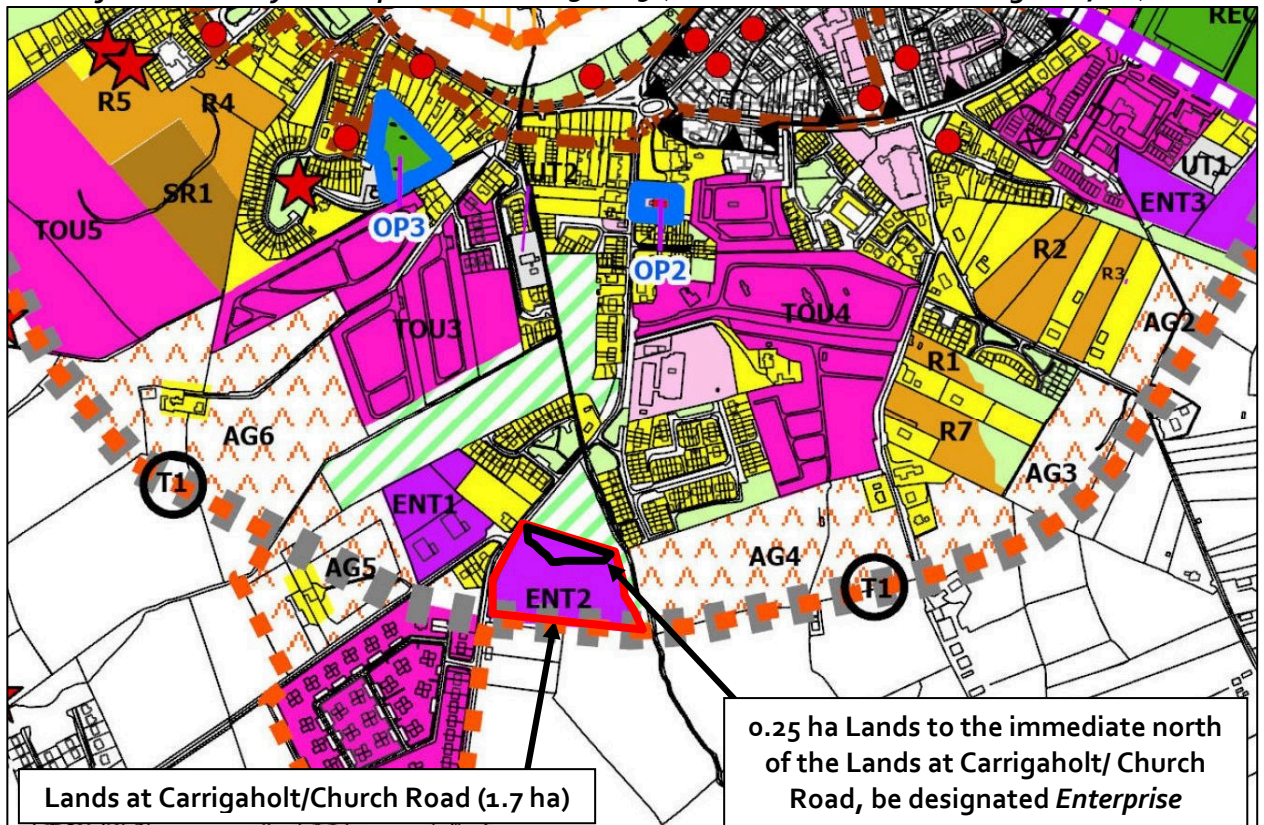
This zoning also allows for associated power generating infrastructure as well as transportation infrastructure such as car and bicycle parking and bus stop shelters. This zoning excludes ~~general retail, retail park outlets,~~ motor sales/servicing activities and heavy industrial undertakings.

Lands zoned for 'enterprise' in large villages and small villages shall be taken to include the use and development of land for small-scale business and enterprise development such as incubator units, craft centres/workshops, small-scale manufacturing, local digital/technology business etc. Retail use on these sites shall only be considered where it is **ancillary complementary as part of an overall integrated mix-use development** to the main activity taking place.

Enterprise developments in large villages and small villages must have a high standard of architecture and landscaping and must be relative and appropriate to the scale, size and character of the settlement in which they are planned to be located.

2. That some *Buffer Space* zoned lands to the immediate north of the *Enterprise* lands along Carrigaholt/Church Road (0.25 ha), be zoned *Enterprise* as presented in **Figure 3.2 below**, while still providing an adequate buffer from the stream along the eastern boundary.

**Figure 3.2: Proposed ENT1 Land Use Zoning Designation extension (0.25 ha) to be Applied to Lands to the immediate north of the Lands at Carrigaholt/Church Road under the Provisions of the Draft Clare County Development Plan 2023-2029 (total ENT1 Land Use Zoning of 1.7 ha)**



Source: Land Use Zoning Map of the Kilkee Draft Clare County Development Plan 2023-2029, extracted, reproduced and annotated by The Planning Partnership under OS Licence No. AR0114722

**As an Alternative Request, but not to diminish our Primary Request as outlined under 1 above:**

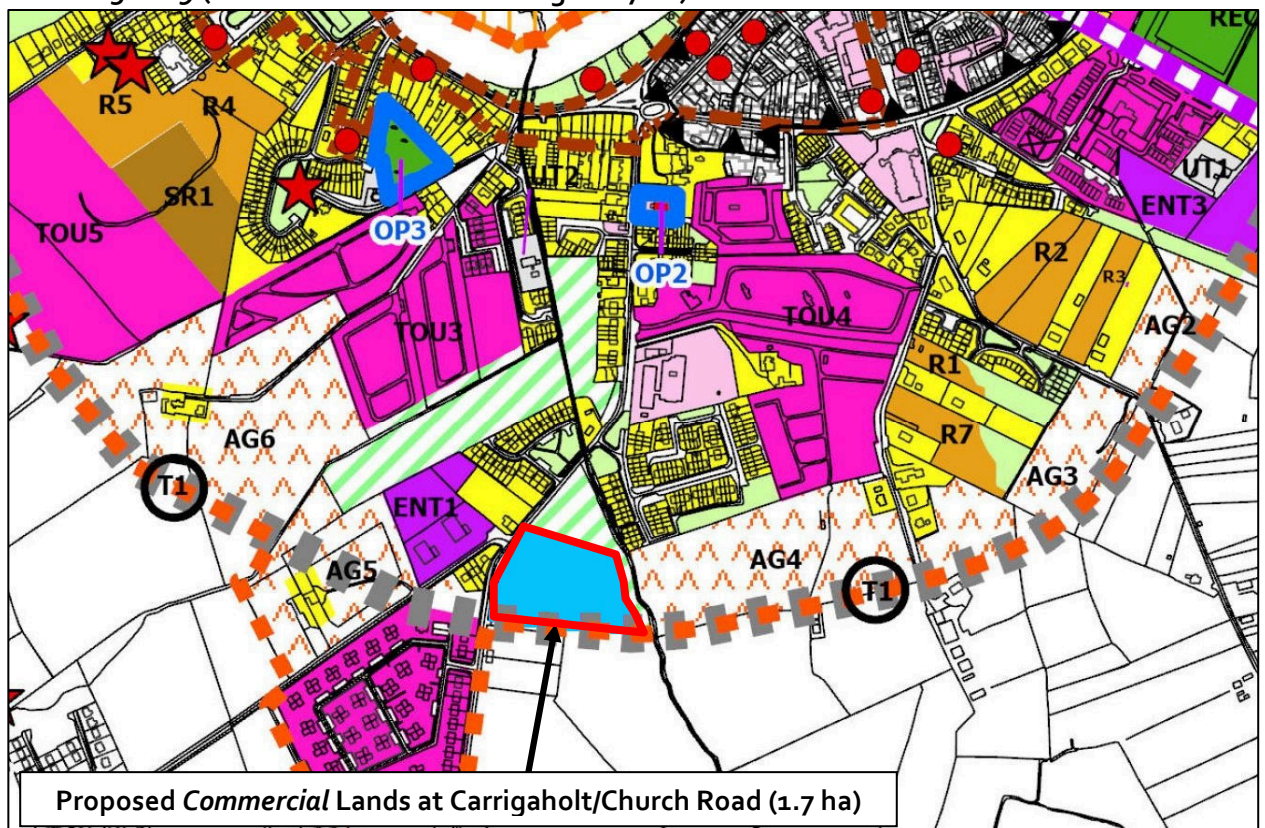
1. That the *Commercial* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029* be amended (**additional text in red** with text to be omitted ~~struckthrough~~) to ensure consistency with development uses which 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*, as follows:

### Commercial

The use of land zoned for 'commercial' purposes shall be taken to include the use of the lands for commercial and business uses including offices, service industry, warehousing and the facilitation of enterprise/retail park/office type uses as appropriate. Retailing **will normally be acceptable in principle** ~~is open for consideration~~ under this zoning, provided that a sequential test is carried out and the lands are demonstrably the optimum location for the nature and quantum of retail development proposed.

- That the lands along Carrigaholt/Church Road (1.7 ha) be zoned *Commercial* as presented in **Figure 3.3 below**, to act as catalyst for facilitating the Retail Objective for Kilkee for the development of a modern convenience goods store, of an appropriate scale, to meet the day to day needs of Kilkee's local catchment population.

Figure 3.3: : Proposed *Commercial* Land Use Zoning Designations to be Applied to Lands along Carrigaholt/Church Road under the Provisions of the *Draft Clare County Development Plan 2023-2029* (total ENT1 Land Use Zoning of 1.7 ha)



Source: Land Use Zoning Map of the Kilkee Draft Clare County Development Plan 2023-2029, extracted, reproduced and annotated by The Planning Partnership under OS Licence No. AR0114722

#### 4.0 CONCLUSION

In closing, The Planning Partnership wishes to make this submission with regards to the future vitality and vibrancy of Kilkee, to act as catalyst for development and deliver the inherent opportunities presented within the objectives of the Council as outlined in the *Draft Clare County Development Plan 2023-2029*.

Finally, we submit that the emerging *Clare County Development Plan 2023-2029* confirms the **Retail Objective** for Kilkee for the "provision of modern convenience goods stores, of an appropriate scale,

*and associated retail and service units to enable these centres to meet the day to day needs of Kilkee's local catchment population".*

It is our professional planning opinion that none of the identified Opportunity Sites, or Mixed Use zoned lands/sites, are suitable and large enough in extent to facilitate a viable development comprising the footprint of a modern, good quality convenience goods store as required.

Should you have any queries or require any further information in relation to the above please do not hesitate to contact me.

Yours faithfully



**Wessel Vosloo**  
Principal  
The Planning Partnership