

# TOWN PLANNING SUBMISSION



DRAFT CLARE DEVELOPMENT PLAN 2023-2029

28<sup>TH</sup> MARCH 2022

SUBMITTED ON BEHALF OF:  
Ann Power,



85 Merrion Square, Dublin 2, D02 FX60  
+353 (0)1 539 0710 info@hpdc.ie www.hpdc.ie



## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our client, Ann Power, [REDACTED] to make a submission on the proposed Draft Clare County Development Plan 2023-2029 with respect to lands at Ballyellery, Liscannor, Ennis, Co. Clare. This submission is made in response to the public notice dated 24<sup>th</sup> January 2022, inviting submissions up until 28<sup>th</sup> March 2022, in relation to the Draft Clare County Development Plan 2023-2029.

The lands subject to this submission comprise c. 1.16 Hectares of unzoned lands within the countryside of Clare County, as outlined in the below figures. The lands are located within undeveloped backlands which are bound by existing residential dwellings. In summary, this submission requests that Clare County Council considers the following:

- We would request that the Planning Authority considers amending the Written Statement of the draft Development Plan to include a Specific Local Objective (SLO) pertaining to the submission lands allowing for an appropriately scaled, infill residential development of 4 no. dwellings. It is also requested that such a SLO are high in both architectural quality and finish.

The submission lands have capacity to accommodate the dwellings in terms of space, wastewater treatment and vehicular access. We request that the recommendations of this submission be given full consideration in the preparation of the forthcoming Clare County Development Plan 2023-2029.

## 2.0 Submission Lands

The submission lands comprises approximately 1.16 hectares of undeveloped lands located to the north of Lahinch, Co. Clare. The lands are currently vacant and are adjoined by residential dwellings at each boundary. The lands are considered optimal for residential development.

The lands are located within an area which currently accommodates over 40 no. dwellings of various style and design. The lands are located less than 300m north from Lahinch's settlement boundary and approximately 1.5km north from Lahinch town centre. Lahinch is a mid-sized town which provides services, amenities and employment for the immediate area. The town is also a well-established tourism-destination within West Clare. The lands are also located approximately 2.5km east of Liscannor village, a smaller settlement which also offers a range of tourism-activities.



Figure 1.0 Aerial image showing immediate context of submission lands, outlined in red.



Figure 2.0 Aerial image showing wider locational context of the submission lands, marked in red.

The lands are located within an attractive, tourist destination which is within close proximity to a number of tourist hotspots, services and recreational amenities.



Figure 3.0 Drone image showing the context of the submission lands as approached from Lahinch.



Figure 4.0 Drone image showing the submission lands located within undeveloped lands to the rear of several properties.



Figure 5.0 Drone image showing the submission lands located within undeveloped lands to the rear of several properties.



Figure 6.0 Drone image showing the submission lands located within undeveloped lands to the rear of several properties.



Figure 7.0 Drone image showing the submission lands located within undeveloped lands to the rear of several properties.

The submission lands are considered ideally located to accommodate an appropriate-scaled infill development, which protects existing amenities whilst not impeding on the quality of the environment.

### 3.0 Planning History of the Submission Lands

The submission lands currently comprise an infill site bound by a cluster of residential dwellings. A review of the Clare County Council online planning register revealed no planning applications in respect of the submission lands, however, the following planning applications were revealed on sites adjoining the submission lands.

- Reg. Ref. 19759** Permission granted by Clare County Council on 25<sup>TH</sup> November 2019 for a development comprising the *'the construction of a 22sqm single storey extension to the west, and a 6sqM single storey extension to the north, new rooflight and alterations to existing windows and to site works and services'*.
- Reg. Ref. 1990** Permission granted by Clare County Council on 10<sup>th</sup> June 2019 for a development which sought to *'retain additional floor area at variance with that approved under planning reference P07-2673; (2) permission for development which will consist of alterations and extensions to existing dwelling house, including all ancillary site works'*.
- Reg. Ref. 19476** Permission granted by Clare County Council on 31<sup>st</sup> July 2019 to: *'Construct a single storey side extension with roof glazing. 2. Replace existing front patio doors with picture window and small window to the North East gable, along with internal / external modifications and all associated site works to house'*.
- Reg. Ref. 18937** Permission withdrawn from Clare County Council for a development which sought permission for *'alterations and extensions to an existing dwelling house, including all ancillary site works'*.
- Reg. Ref. 18671** Permission granted by Clare County Council on 15<sup>th</sup> October 2018 for a development comprising the *'extension onto rear of existing dwelling house and all ancillary site works.'*
- Reg. Ref. 18393** Permission granted by Clare County Council on 2<sup>nd</sup> July 2018 for a development to *'alter and extend the existing dwelling house and all associated ancillary site works'*.
- Reg. Ref. 17681** Permission granted by Clare County Council on 31<sup>st</sup> October 2017 for a development to *'extend the existing dwelling house, alter the existing fenestration and upgrade the sewerage system and all associated site and ancillary works'*.
- Reg. Ref. 17485** Permission granted by Clare County Council on 9<sup>th</sup> August 2017 for a development to *'alter and extend the existing house and all associated ancillary site works'*.
- Reg. Ref. 1736** Permission granted by Clare County Council on 3<sup>rd</sup> August 2017 for a development comprising the *'(a) construction of single storey dwelling house on infill site under Clare County Council Development Plan Objective 3.13, (b) new on-site advanced wastewater treatment system and soil polishing filter, (c) new vehicular entrance and (d) all ancillary site works'*.
- Reg. Ref. 15800** Permission granted by Clare County Council on 18<sup>th</sup> January 2016 for a development comprising *'alterations to the existing detached dwelling house by forming a first floor extension of 22.6sqM to front, a rear extension of 8.9sqM to ground floor and 15.4sqM to first floor, conversion of attic space 19.8sqM to habitable space, replacement dormer windows and new velux to front elevation, replacement windows and external doors, with alterations to site works comprising new front boundary with car parking, and alterations to services'*.

- Reg. Ref. 15400** Permission granted by Clare County Council on 28<sup>th</sup> July 2015 for a development to *'construct single storey front and side extension and all associated site works to house No. 3'*.
- Reg. Ref. 14663** Permission granted by Clare County Council on 11<sup>th</sup> December 2014 for a development *'to alter and extend the existing dwelling house and all associated ancillary site works'*.
- Reg. Ref. 081276** Permission granted by Clare County Council on 23<sup>rd</sup> March 2009 for a development *'to demolish an existing house and garage and to construct a new house and associated site works'*;
- Reg. Ref. 072673** Permission granted by Clare County Council on 15<sup>th</sup> April 2008 for a development *'to construct an extension to their dwelling house effluent treatment system new entrance onto road and associated site works'*
- Reg. Ref. 05423** Permission granted by Clare County Council on 26<sup>th</sup> April 2005 for a development comprising the *'demolition of a garage/shed, part demolition, extension and alteration to an existing dormer dwellinghouse to provide a 1.5 storey dwelling and RETENTION permission for an existing septic tank and percolation area'*
- Reg. Ref. 041475** Outline permission refused by Clare County Council on 27<sup>th</sup> August 2001 11<sup>th</sup> December 2014 for a development *'to construct 14 No. Houses, expansion of existing treatment plant (puraflo) and associated site works'*
- Clare County Council's decision to refuse permission was subject to a First Party Appeal to An Bord Pleanála who, subsequently, upheld the decision of the Planning Authority and refused permission for the development under An Bord Pleanála Ref. 208658.
- Reg. Ref. 04944** Permission granted by Clare County Council on 24<sup>th</sup> June 2006 for a development *'to alter and extend the existing dwelling house'*
- Reg. Ref. 04259** Outline permission refused by Clare County Council on 29<sup>th</sup> April 2004 for a development comprising *'14 No. houses as previously granted outline permission (Ref. P98/1720), expansion of existing treatment plant (Puraflo) and associated site works'*
- Reg. Ref. 981720** Outline permission granted by Clare County Council on 28<sup>th</sup> April 1999 for a development *'to construct 14 no. houses, treatment plant & associated works'*.
- Reg. Ref. 981521** Permission granted by Clare County Council on 15<sup>th</sup> January 1999 for a development *'to install a Bord na Mona puraflo system to service the 8 house scheme under construction.'*
- Reg. Ref. 951084** Permission granted by Clare County Council on 7<sup>th</sup> February 1996 for a development comprising the *'construction of an extension to and refurbish existing dwellinghouse.'*
- Reg. Ref. 95432** Outline permission granted by Clare County Council on 26<sup>th</sup> November 1996 for a development *'construct a dwelling house with septic tank'*

## 4.0 Planning Policy Context of the Subject Lands

As outlined in the Planning History Section of this submission above, the surrounds of the submission lands have been subject to a number of planning applications for residential development or extensions to existing dwellings. A total of 40 no. dwellings are located within the immediate surrounds of the area. The following section will discuss the planning policy context pertaining to the submission lands and their surrounds.

### 4.1 Regional Spatial and Economic Strategy for the Southern Region 2020-2032

The Regional Spatial & Economic Strategy provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region. The Southern Region, inclusive of County Clare, represents over 40% of Ireland's total landmass and one third of the national population. The National Planning Framework has outlined the outcomes from the RSES in terms of compacting growth, enhancing regional accessibility and strengthening rural economies and communities. The following is the vision for the RSES for the Southern Region:

- Nurture all our places to realise their full potential;
- Protect and enhance our environment;
- Successfully combat climate change;
- Achieve economic prosperity and improved quality of life for our citizens;
- Accommodate expanded growth and development in suitable locations; and
- Make the Southern Region one of Europe's most creative, innovative, greenest and liveable regions.

County Clare plays a key role in attracting tourism given the proximity to recognised tourism assets including the Cliffs of Moher, Burren, Loop Head and unique character towns and villages in West Clare, all of which are easily accessible from the submission lands. The tourist attractions play a vital role in the economic growth and future prosperity for the area.

### 4.2 Project Ireland 2040 National Planning Framework

Published on 19<sup>th</sup> June 2018, Project Ireland 2040 – The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million people working in Ireland by 2040. With a specific reference to the Mid-West region, inclusive of County Clare, the plans for future growth within this region are dependent upon the national and international connectivity, higher education capacity and quality of life to secure strategic investment. Accordingly, building on Government policy and the 2017 Action Plan for Rural Development, the National Planning Framework will place a major focus on rural areas in relation to:

- *Strengthening Ireland's rural fabric and supporting the communities who live there;*
- *Planning for the future growth and development of rural areas, including addressing decline, with a special focus on activating the potential for the renewal and development of smaller towns and villages;*
- *Putting in place planning and investment policies to support job creation in the rural economy;*
- *Addressing connectivity gaps; and*
- *Better co-ordination of existing investment programmes dealing with social inclusion, rural development and town and village renewal.*

The submission lands are located within close proximity to Ireland's western coastline with the ability to achieve all the goals set above in national policy. The rural fabric of west Clare can be enhanced to contribute to the overall economy of the area through sustainable development and renewal of the built form. The submission lands are unique in the fact that a large number of residential developments have been clustered together over the past number of years. Accordingly, it is considered that the provision of a Specific Local Objective at these lands to encourage the provision of an additional 4 no. dwellings, accords is an appropriate request as it will encourage the use of backland to accommodate much needed housing for families.



The following policies of the National Planning Framework are considered to be relevant in the context of the proposed development:

*National Policy Objective 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.*

*National Policy Objective 16 Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

The subject site corresponds with the policies outlined within the National Planning Framework and the principles of sustainable growth. The submission lands have the capacity to provide additional rural dwellings without having any adverse impacts on the environment.

Accordingly, the provision of an SLO contained within the Clare County Development Plan which allows an infill development of 4 no. dwellings is consistent with the above. The submission lands have capacity to accommodate 4 no. dwellings without impeding on the environment or amenities of existing properties.

#### **4.3 Clare County Development Plan 2017-2023**

The Clare County Development Plan 2017-2023 came into effect on 25<sup>th</sup> January 2017. In accordance with the County Settlement Hierarchy, as set out in Table 2.1 of the development plan, the submission lands are located within the 'Countryside', being all those parts of the County located outside of the recognised settlements. The following objective is of relevance to the application site:

**Objective CDP 3.8** *To ensure that the countryside continues to play its role as a place to live, work and visit having careful regard to its carrying capacity and environmental sensitivity.*

The submission lands are located approximately 650 metres to the north of residentially-zoned lands within the settlement of Lahinch. The lands are also located on the main regional road from Lahinch town to Liscannor village with the subject lands being located approximately 2.5km from the zoned lands of Liscannor.

##### **5.3.1 Rural Area Types**

Clare County Council supports the long tradition of people living in the countryside in dispersed settlement patterns and is supported in with the Sustainable Rural Housing - Guidelines for Planning Authorities (DoEHLG). These Guidelines constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended). Therefore, the Council is required to have regard to them in formulating its policies on rural housing.

The Guidelines require the Council to identify the different types of rural areas within the county, as set out in the National Planning Framework: Project Ireland 2040, and to tailor policies that are responsive to:

- *The varying characteristics of rural areas; and*
- *The different housing requirements of urban and rural communities.*

The following two areas were identified:

- *Rural areas under strong urban pressure; and*
- *Rural areas that are structurally weak or with a strong agricultural base.*

The application site is located within a 'Rural area under strong urban pressure' as per the following map extract in Figure 8.0 overleaf.

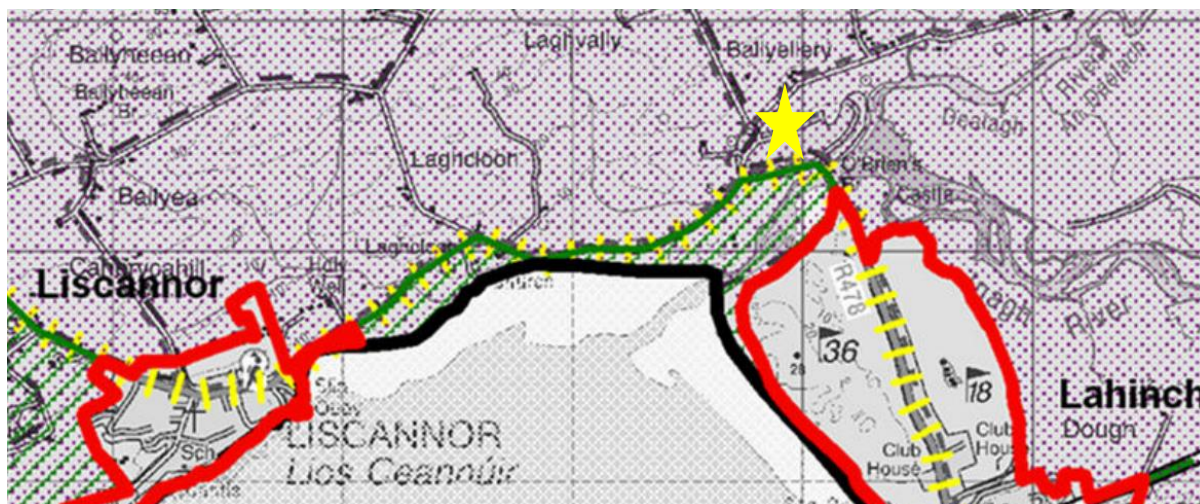


Figure 8.0 Extract from Map H3 'Areas of Special Control' in the Clare County Development Plan 2017-2023, showing the application site, denoted by a yellow star, located within a 'Rural area under strong urban pressure'.

### 5.3.2 Rural Areas under Strong Urban Pressure

As illustrated above, the submission lands are located within a rural area under strong urban pressure. As per section 3.2.5 of the draft Development Plan, these areas display the greatest pressures for development due to:

- Proximity to the immediate environs or close commuting catchment of large towns;
- Rapidly rising population;
- Location in areas of considerable pressure for development of housing due to proximity to urban centres; and
- Proximity to major transport corridors with ready access to urban areas.

The key objectives of Clare County Council with regards to these areas are:

- To facilitate the genuine housing requirements of the local rural community (rural generated housing), subject to satisfactory site suitability and technical considerations; and
- To direct urban-generated development to areas zoned for new housing development in the adjoining urban centres, towns and villages as identified in the County Settlement Strategy and to seek to enhance these settlements.

Despite the designation of the submission lands within the countryside, the immediate lands contain a cluster of residential dwellings, currently comprising c. 40 houses and the submission lands are located within a backland site between this cluster. It is considered that the lands have remaining capacity to accommodate further infill development of a suitable, high-quality architectural level.

### 5.3.3 Service Towns

The Clare County Development Plan 2017-2023 notes that the Mid-West Regional Planning Guidelines 2010-2022 identified three Service Towns in County Clare, namely Kilrush, Ennistymon/ Lahinch and Scarriff/Tuamgraney. The Development Plan reflects the designations and has regard to the local characteristics of these settlements. They 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. The following is an objective of the development plan pertaining to Service Towns:

**CDP3.3** To ensure that the Service Towns in County Clare are 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 subregional growth.*

The primary function of Service Towns is the provision of convenience goods and everyday services. Some Service Towns such as Lahinch and Kilrush also benefit from their tourist and visitor attraction which allows them to support a wider range of comparison goods than would be justified by their local catchment population. The primary objective for these centres is to enhance the quality of their convenience goods provision, enabling the construction of modern food store outlets. Sustainability benefits in terms of reducing vehicle miles travelled can be achieved through providing improved facilities in Service Towns. Additionally, where towns have an established tourist and visitor function, the provision of tourist-orientated retailing will be supported to encourage the tourist industry

#### **5.3.4 Small Villages**

The nearby settlement of Liscannor is referred to in the Development Plan as a small village. A small village can be defined as a 'smaller settlement that generally have predominately rural character with some public/community services.' The strategy for these areas is as follows:

*'to encourage small-scale, incremental residential growth that reflects the rural nature of the settlements.'*

While encouraging small scale development is a priority, it is also an objective of the Development Plan to maintain a sustainable level of growth in order to contribute to the overall economy of Clare. The following are objectives of the Clare County Development Plan 2017-2023:

**CDP3.6** *To ensure that the small villages throughout the County maintain existing population levels and services and future growth is incremental and small scale in nature, relative and appropriate to their scale size and character.*

**CDP3.7** *To ensure that clusters throughout the County maintain their existing character providing only for very small-scale growth.*

This proposal adheres to the policy set for the area to stimulate a small-scale growth within a clustered area to capitalise on existing infrastructures.

#### **5.3.5 Clusters**

The current Clare County Development Plan includes a 'clusters' settlement type which are described as *'the smallest type of settlement in the hierarchy and their character reflects traditional building patterns with a loose collection of rural dwellings clustered around one or more focal points'*.

The strategy for these settlements. As per the development plan, is to facilitate a small number of additional dwellings and/or small enterprises to consolidate the existing pattern of development around the focal points and utilise existing services in the area. To meet the needs of those wishing to settle in rural areas, the provisions of Objective CDP 3.11 (i.e. 'Local Need' requirement) will not apply to applicants for single houses within the designated cluster boundaries.

The submission lands are not designated as a cluster, however, a cluster of dwellings are located within the area. It is considered that the review of the development plan may facilitate the provision of a Specific Local Objective which allows the consideration of an infill development of a low-density housing scheme.

#### **5.3.6 The Countryside**

The submission lands are located within the countryside of Clare County. As such, the policies and objectives surrounding development within these areas is sensitive to the role that the countryside has within the Settlement Hierarchy. The countryside, particularly that of rural Clare, has the important role in terms of employment, tourism and leisure. Development Plan Policy CDP3.8 states the following:

**CDP3.8** *It is an objective of the Development Plan: To ensure that the countryside continues to play its role as a place to live, work and visit having careful regard to its carrying capacity and environmental sensitivity.*

Despite this, the lands currently accommodate a number of residential dwellings and there is capacity for further infill development which protect the character of the countryside. The following policy is of note:

**CDP 4.16** *In the case where there is a grouping of rural houses, the development of a small gap site, sufficient to accommodate only one house, within an otherwise substantial and continuously built-up frontage, will be permitted provided it respects the existing development pattern along the frontage in terms of size, scale, siting, plot size and meets normal site suitability requirements. Dwellings constructed on infill sites of this nature must be for the permanent occupation of the applicant. The applicant must not already own or have owned a house in the surrounding rural area (except in the exceptional circumstances as set out in subcategory iii under the Social Need criteria) and needs the dwelling for their own permanent occupation. The siting of new dwellings in the countryside so as to deliberately create a gap site of this nature will not be permitted. In circumstances where these sites occur in the 'Areas of Special Control', unless otherwise specified in this objective the provisions of Objective CDP4.14 (i.e. Economic or Social Need requirement) will not apply. The assessment of an application for a rural house on an infill site shall have regard to environmental considerations, the viability of smaller towns and rural settlements, siting and design issues and the Clare Rural House Design Guide.*

The submission lands are considered ideally located to accommodate several dwellings on the lands.

### **5.3.7 West Clare Municipal District Written Statement and Settlement Plans**

Volume 3(d) of the Clare County Development Plan 2017-2023 outlines the policies and objectives for development of settlements in West Clare. Lahinch, immediately south of the submission lands, is listed as a 'Service Town' whereas the nearby Liscannor is listed as a 'Small Village'. The written statement outlines general objectives for Lahinch:

- *To facilitate the consolidation and regeneration of Ennistymon/Lahinch to ensure a strong and vibrant community that will allow for its future sustainable growth as the service town in North Clare;*
- *To provide for comprehensive traffic management in Ennistymon/Lahinch that will contribute to an improved quality of environment and increased development potential;*
- *To facilitate a permanent resident population to ensure the sustainable growth of Lahinch;*
- *To make provision for the development and maintenance of physical infrastructure in Ennistymon/Lahinch that will effectively accommodate the resident population, meet the increase in demand during the summer months and allow for future growth;*
- *To safeguard the existing character of the town centres by permitting development that respects the existing built heritage and encourages regeneration through appropriate renovation and redevelopment of derelict buildings;*
- *To seek to provide parking to serve the Main Street and town centre as part of an overall traffic management plan for Ennistymon;*
- *To facilitate the provision of public infrastructure including suitably sited and designed public toilet and shower facilities to serve beach users at Lahinch as part of an overall enhancement plan for the promenade and adjoining area including Lahinch Seaworld and Leisure Centre and indoor and outdoor pursuits building;*
- *To facilitate the development of safe routes to school by protecting the route of the former West Clare Railway for eventual development to serve this purpose.*

The written statement also contains objectives for Liscannor village, as follows:

- *To ensure that the village maintains and increases its existing permanent population levels;*
- *To make provision for growth within the village which will support existing services and encourage further expansion of the service base, whilst retaining its character and setting;*

- To encourage proposals for suitably-scaled and appropriate commercial or employment generating development;
- To facilitate the provision of a wastewater treatment plant to serve the settlement;
- To provide for residential development to cater for permanent population in the area.

## 5.4 Draft Clare County Development Plan 2023-2029

### 5.4.1 Zoning Objective

As per the draft Clare County Development Plan 2023-2029, the submission lands maintain the previous zoning objective of ‘Countryside’ lands under Strong Urban Pressure.

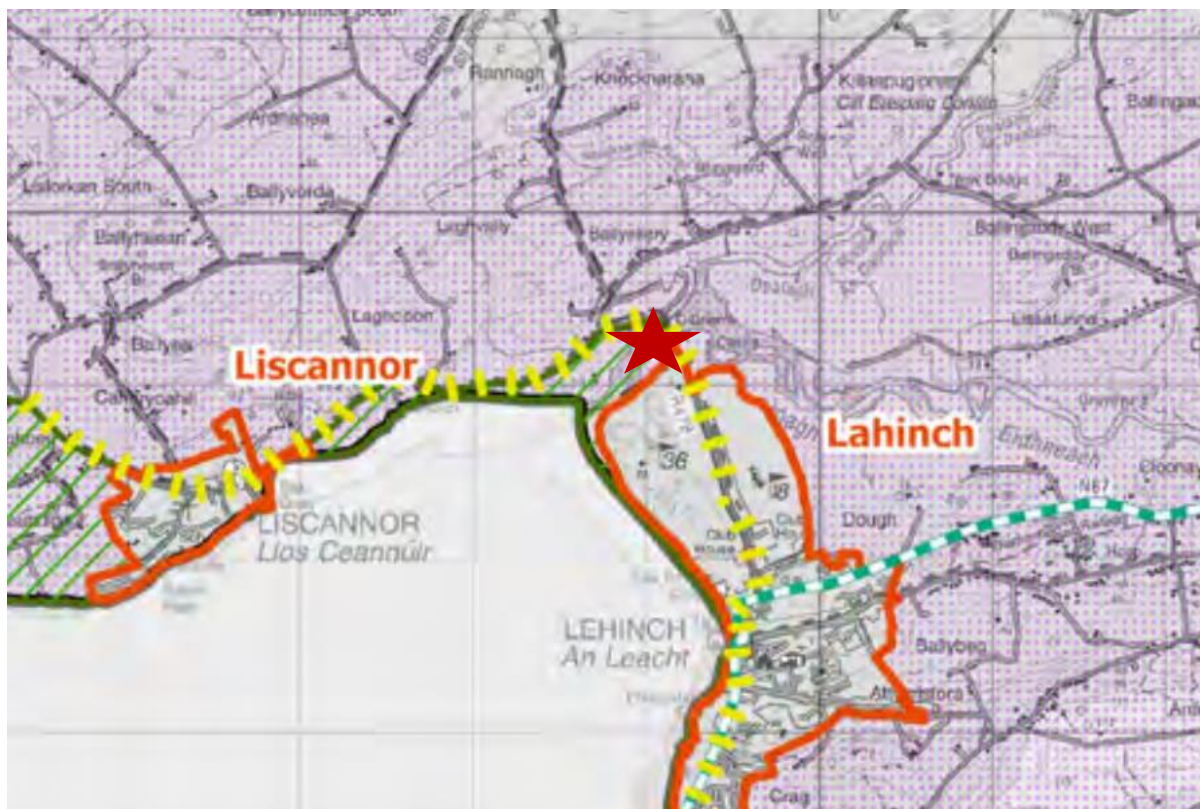


Figure 9.0 Extract from Map H3 ‘Areas of Special Control’ in the draft Clare County Development Plan 2023-2029, showing the application site, denoted by a red star, located within a ‘Rural area under strong urban pressure’.

### 5.4.2 Settlement Hierarchy

In addition to maintaining the existing zoning provision, the submission lands are also continue to be designated as the countryside. Similarly, Lahinch maintains its designation as a ‘Service Town’ whereas the nearby Liscannor has been designated as a ‘Tier 1 Large Village’. The draft Clare County Development Plan also prescribes a list of ‘rural clusters’ which are settlements smaller than a village but contain groups of residential dwellings. The draft plan states that:

*‘These are the smallest type of settlement in the hierarchy and their character reflects traditional building patterns with a loose collection of rural dwellings clustered around one or more focal points.’*

*‘The strategy for these settlements is to facilitate a small number of additional dwellings and/or small enterprises to consolidate the existing pattern of development around the focal points and utilise existing services in the area. To meet the needs of those wishing to settle in rural areas, the provisions of Objective CDP 4.14 (i.e. Social or Economic Housing Need requirement) will not apply to applicants for single houses within the designated cluster boundaries.’*

<b>Key Town</b> Ennis
<b>Metropolitan Area</b> (Key component of the Limerick-Shannon Metropolitan Area Strategic Plan) Shannon SDZ Sixmilebridge (Small Town) Athlunkard, Bunratty, Clonlara, Parteen, Ballycannon North, Meelick (Large Villages) Ardnacrusa, Cratloe, O'Briensbridge (Small Villages)
<b>Service Towns</b> Ennistymon/Lahinch, Kilrush/Cappa, Scarriff/Tuamgraney
<b>Small Towns</b> Kilkee, Killaloe, Lisdoonvarna, Miltown Malbay, Newmarket-on-Fergus, Tulla
<b>Large Villages</b> <b>Tier 1</b> Ballyvaughan, Clarecastle, Corofin, Crusheen, Doonbeg, Feakle, Inagh, Kilkishen, Mountshannon, Mullagh, Quilty, Quin, Whitegate, Liscannor, Kilfenora and Killimer <b>Tier 2</b> Kiladysert, Kilmihil
<b>Small Villages</b> Barefield, Bridgetown, Broadford, Carrigaholt, Cooraclare, Doolin, Kilmaley, Kilmurry, Labasheeda, Lissycasey, Ballinruan, Ballyea, Ballynacally, Bellharbour, Bodyke, Boston, Caher, Carron, Cloonev, Connolly, Crannv, Creegh, Cross, Doonaha, Fanore, Flagmount, Inch, Kilbaha, Kilbane, Killaneana, Kilmurry McMahon, Kilnaboy, Kilnamona, Kilshanny, Knock, Knockerra, Moy, Moyasta, O'Callaghans Mills, Ogonelloe, Querrin, Ruan, Spanish Point, Toonagh, Tubber
<b>Clusters</b> Ardkyle, Ballaghboy No.1, Ballaghboy No.2, Ballinuoskey/Lisconner, Ballintlea South, Ballintlea South 2, Ballycar, Ballycorick, Ballyduff, Ballyea South, Ballyfaudeen, Ballyhannon North, Ballyhannon South No.1, Ballyhannon South No.2, Ballygreen, Ballymacahill, Ballymorris, Ballynagin West, Ballyveskil/Tiermaclane, Ballyvonnavaun/Deerpark, Ballyvrislaun, Barntick, Barloughra, Bartra, Bealaha, Bearnafunshin/Ballyogan, Beevrack, Behagh, Buncraggy, Caherea, Caherush, Cappa, Sixmilebridge, Carrowmeer, Castlecrine, Castlequarter, Castlequarter Kilkeedy, Cloonadrum, Cloonanaha, Cloonoughter, Coogyulla Cross, Coolisteige, Cratloekeel, Crosses of Annagh, Deerpark/Corlack, Doonass, Drumandoora, Drumdrehid, Drumeen, Drumline 1, Drumline 2, Drummina, Drumquin, Finvarra, Garraun, Garraunboy, Gilloge, Kildorus, Killeenan, Killow/Knockanimana, Kilmaley Lower, Kilmore, Kineilty, Knockfin, Knockloskeraun, Leamaneigh More, Lisduff, Lisheen, Luogh South, Manusmore, Maurices Mills, Meelick, Monaskeha, Mooghaun North, Mortyclough, Mountrivers Cluster, Murrooghkilly, Murroughtoohy South, New Quay, Newtown Cloonlara, Noughaval, Portdrine, Poulawillin, Rockforest/Aughrim, Roo East, Sooreeny, South of Rossmanagher Bridge, Spancil Hill, Streamstown, The Wells, Tromra, Urlan More/Bellsfort, Williamstown, Woodpark
<b>Countryside</b> The countryside are those parts of County Clare outside of recognised settlements

Figure 10.0 Extract of Table 3.1 of the Draft Clare County Development Plan 2023-2029. The submission lands are unlisted and, accordingly, fall under the category of 'countryside',

In relation to clusters, the following objective of Clare County Council is noted:

**CDP 4.9** *To ensure that clusters throughout the County maintain their existing character providing only for very small scale growth of dwellings and/or small enterprises where they can be suitably integrated with respect to the setting and context*

The draft Clare County Development Plan introduces commentary on 'Settlement Networks' and recognises that the development of inter and/or multi settlement relationships presents opportunities for collaborative projects with shared benefits so as to fully harness the potential of opportunities and the management of challenges.

The draft plan defines settlement networks as the following:

*'groupings of towns and villages (including cross boundary) which share geographic location, economic assets and other resources and which contribute specialisms which if combined can provide a strategic opportunity to drive the regional economy.'*

The following policy is noted:

**CDP 4.11** *It is an objective of Clare County Council: To support the concept of settlement networks, to assist collaborative projects and the sharing of assets and strengths, to enhance the viability of County Clare's towns, villages and rural communities in order to facilitate the maintenance and expansion of existing population levels, services and roles.*

The submission lands contain a cluster of dwellings which are closely entwined with the settlement of Lahinch. Accordingly, it is considered that there is capacity to provide for additional residential development on the submission lands at an appropriate scale which encourage a settlement network. The provision of an SLO a the submission lands is considered to accord with the settlement strategy.

## 6.0 Submission Request

The Clare County Development Plan 2023-2029 seeks to support the orderly and sustainable development of urban and rural areas within the county. In light of these objectives of the development plan, we would like to make a formal submission on the draft plan as follows:

- We would request that the Planning Authority considers amending the Written Statement of the draft Development Plan to include a Specific Local Objective (SLO) pertaining to the submission lands allowing for an appropriately scaled, infill residential development of 4 no. dwellings. It is also requested that such a SLO are high in both architectural quality and finish.

## 6.1 Basis of Submission

The following section will set out the basis for the submission request. From the outset, it is submitted that the submission lands do not fall within the category of 'open countryside' due to the large number of existing residential dwellings in the area. Approximately 40 no. dwellings are located on the surrounds of the site, as illustrated below.



Figure 11.0 Aerial image showing a large number of dwellings within the environs of the submission lands.

Due to this, it is considered that the submission lands may accommodate further residential development subject to a high-quality design and appropriate protection of existing character, amenity

and environmental factors. The draft Clare County Development Plan 2023-2029 defines the 'countryside' as follows:

*'the countryside are those parts of County Clare outside of recognised settlements.'*

The draft plan also notes that:

*'the Countryside refers to those rural parts of the County outside of designated settlement boundaries.'*

It is our considered opinion that the lands surrounding Ballyellery could accommodate infill residential development due to the high level of existing dwellings which are located in the immediate vicinity. At present, the lands are 'backland' and have an opportunity to be developed to provide additional family-owned lands.

In addition to the above, the draft development plan outlines historic trends pertaining to residential development and highlights the reduction of approved 'one-off' residential dwellings. The follow figures refer:

Granted Planning Applications	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Grand Total	Average % '11-'20
Houses and Apartments # (units) Excl. SRD	48	25	21	34	78	163	258	194	256	334	1,411	
One-Off Houses # (units) <sup>15</sup>	185	123	100	106	129	159	192	243	220	158	1,615	
Average floor size of SRD	248.4	240.3	242.1	244.4	256.6	250.3	249.6	242.7	244.4	241.8		246.03
Houses and Apartments % of Total	21%	17%	17%	24%	38%	51%	57%	44%	54%	68%	39.1%	39.1%
One-Off House % of Total	79%	83%	83%	76%	62%	49%	43%	56%	46%	32%	60.9%	60.9%
Total #	233	148	121	140	207	322	450	437	476	492	3,026	

Figure 12.0 Extract of Table 4.16 of the draft Housing Strategy within the draft Clare County Development Plan 2023-2029 demonstrating a gradual reduction in one-off housing from 2011-2020.

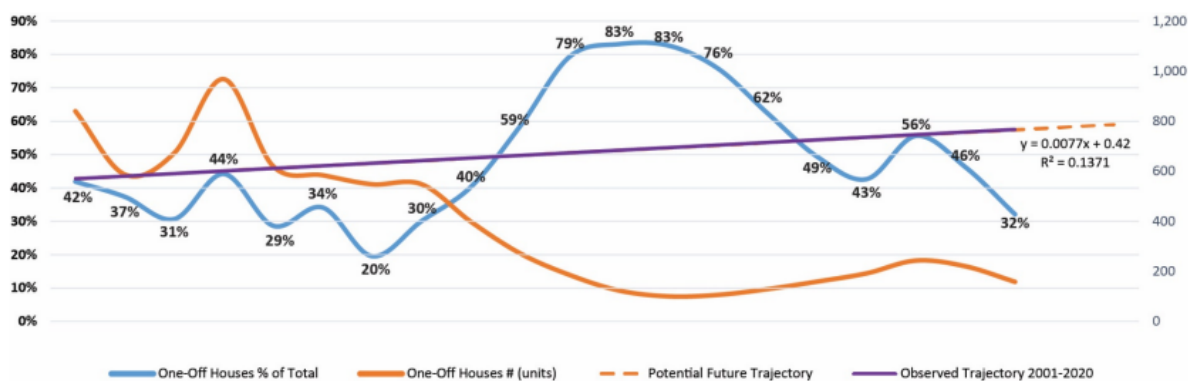


Figure 13.0 Extract of Figure 4.8 of the draft Housing Strategy within the draft Clare County Development Plan 2023-2029 demonstrating the single rural dwelling permissions within County Clare between 2001-2020.

The reduction of one-off housing within the countryside may be attributed to policy implemented at a national level which seeks to provide a majority of homes within established settlements areas. It is anticipated that this trend will continue to decline during the lifetime of the Clare County Development Plan 2023-2029. On this basis, it is considered that the rezoning of the designation of the submission lands to accommodate infill residential development would be consistent with the above. The adjoining lands currently comprises approximately 40 no. residential dwellings and the submission lands have the capacity to accommodate additional, infill dwellings. The provision of such dwellings would be considered appropriate as the site is already build-up with a cluster of dwellings and a sensitively-designed scheme would ensure that the open countryside is protected. By including a Specific Local



Objective within the development plan, the submission lands would be open to providing a high quality infill scheme consisting of much needed family homes in an already subjected to residential development.

**4.1 Indicative Concept for Infill Development**

This submission on the draft Clare County Development Plan 2023-2029 is accompanied by an indicative design concept for appropriate residential development upon the submission lands, as prepared by David H. Leahy Architects. Extracts of which are featured below.



Figure 14.0 Extract of Design Concept prepared by David H. Leahy Architects. The infill scheme provides for 4 no. units which integrate seamlessly with the surrounds whilst protecting residential amenity.



Figure 15.0 Elevation of proposed scheme. The design is of a unique, high-quality which has been informed by the history and environs of the lands.

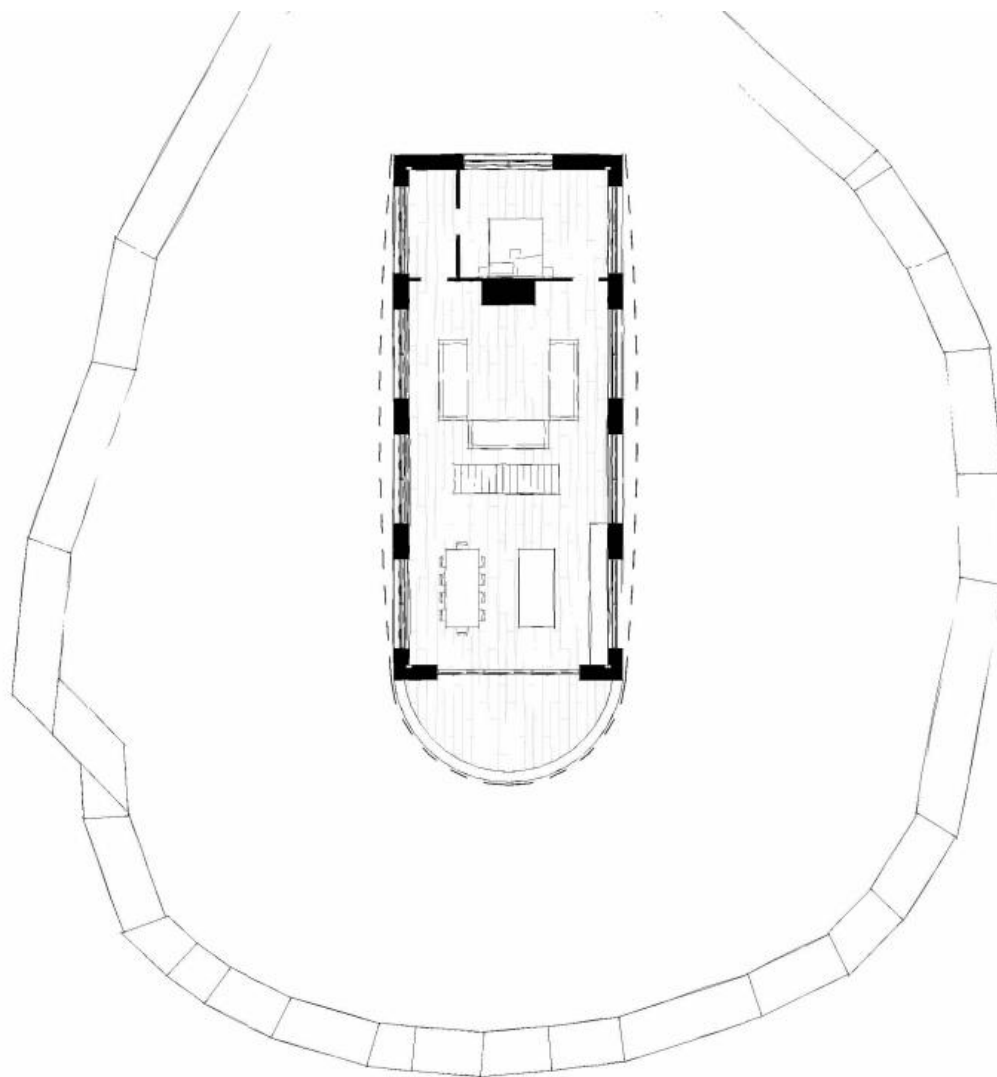


Figure 16.0 Extract of Design Concept prepared by David H. Leahy Architects. The scheme demonstrates a sustainable approach to the utilisation of the backlands.

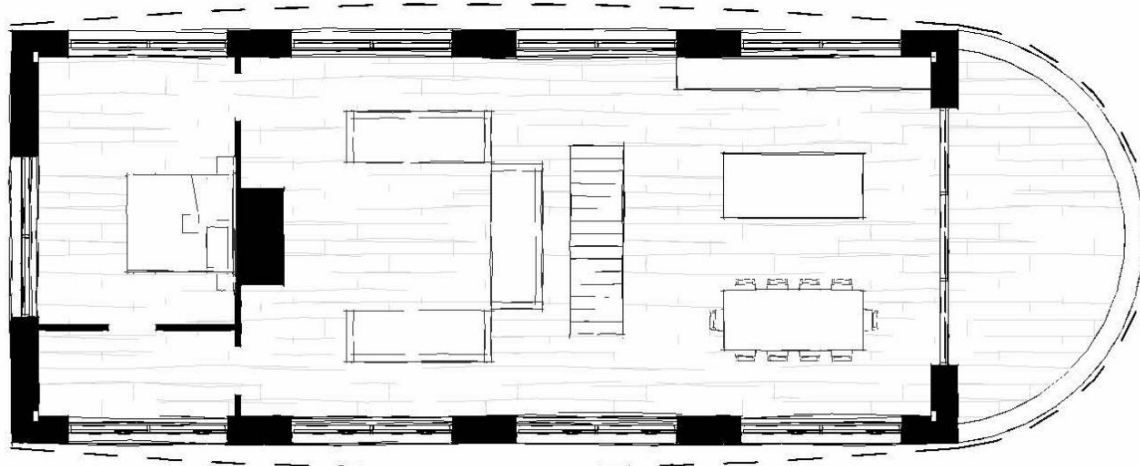


Figure 17.0 Design Concept floor plan of the preliminary scheme.



Figure 18.0 Section of proposed scheme. The design is of a unique, high-quality which has been informed by the history and environs of the lands. The dwellings would be provided below the existing floor level resulting in a single-storey appearance.



Figure 19.0 Section of proposed scheme. The design is of a unique, high-quality which has been informed by the history and environs of the lands. The dwellings would be provided below the existing floor level resulting in a single-storey appearance.

As demonstrated on the preliminary design concept, it is considered that the submission lands have development capacity to accommodate 4 no. dwellings of two-storey. The siting of the dwelling is considered to be suitable and best placed to protect surrounding amenity whilst also ensuring the new dwellings are provided with a high level of amenity. The views from the proposed houses ground would be considered to be of extremely high quality, further adding to amenity, whilst also protecting established views from adjoining properties.

The Design Concept has prioritised the integration of the dwellings into the receiving environment. In order to avoid a large building footprint on the site, the concept provides for two storey dwellings. However, due to the relationship between the dwellings and the ground levels, the houses appear as single storey. This approach ensures consistency with the ancient landscape design concept origin.

The Design Concept includes several amenity benefits including a useable outdoor area with protection from the elements which arise from the proposed ground-cutting. Indicative Daylight / Sunlight studies confirm that the lower bedroom floor gets plenty of direct sunlight when the sun is at its lowest in the sky during winter solstice.

The images overleaf demonstrate the concept inspiration and images of how the living areas may be finished.



Figure 20.0 Concept picture indicating how the finished dwelling may appear.



Figure 21.0 Concept inspiration of nearby Liscannor Harbour.



Figure 22.0 Concept inspiration of nearby Liscannor Harbour.



3G9598 [RM] © www.visualphotos.com

Figure 22.0 Historic setting which inspired the preliminary design.



Figure 23.0 Concept picture indicating how the finished dwelling may appear.

The preliminary design concept demonstrates one method of providing additional dwellings while protecting the receiving environment. It is contended that the submission lands are appropriate and suitable to accommodate such an infill development.

It is requested that Clare County Council considers introducing a Specific Local Objective at the submission lands to allowing for infill development of 4 no. units.

## 6.0 Conclusion

This submission is prepared in response to the Draft Clare County Development Plan 2023-2029 in preparation for a new development plan for the county. In summary, this submission requests that Clare County Council considers the following:

- We would request that the Planning Authority considers amending the Written Statement of the draft Development Plan to include a Specific Local Objective (SLO) pertaining to the submission lands allowing for an appropriately scaled, infill residential development of 4 no. dwellings. It is also requested that such a SLO are high in both architectural quality and finish.

The submission lands are located within a rural area within the backlands of a large number of one-off residential dwellings. A total of 40 no. houses are within the immediate setting with additional dwellings being located in the wider area. The lands are not considered to fall within the category of 'open countryside' due to the level of existing dwellings and their location at the settlement boundary of Lahinch.

The submission also includes a preliminary Design Concept prepared by David H. Leahy Architects which demonstrates one example of how 4 no. houses could be provided at the submission lands which protect existing residential amenity, views, and environmental factors. The scheme also ensures a high level of amenity to future occupants.

We trust that the Planning Authority will have regard to the contents of this submission in the adoption of the Clare County Development Plan 2023-2029.



Kevin Hughes MIPI MRTPI  
Director  
for HPDC Ltd.

## **Appendix A**

Design Concept prepared by David H. Leahy Architects.



**Design Concept for Site at Ballyvellery, Liscannor, Co. Clare.**

Our design proposal consists of four sensitivity placed homes located on the linear stretch of lands between the two current rows of existing houses.

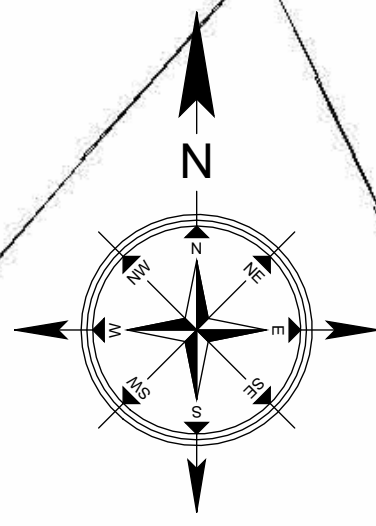
Part of our design concepts are derived from the traditional Irish Currach and how the boat silhouette appears when placed onto the land away from the water.

This contour shape imprints to form our buildings all embracing roof top section, with traditional dry stone external walls supporting this form on the upper building level.

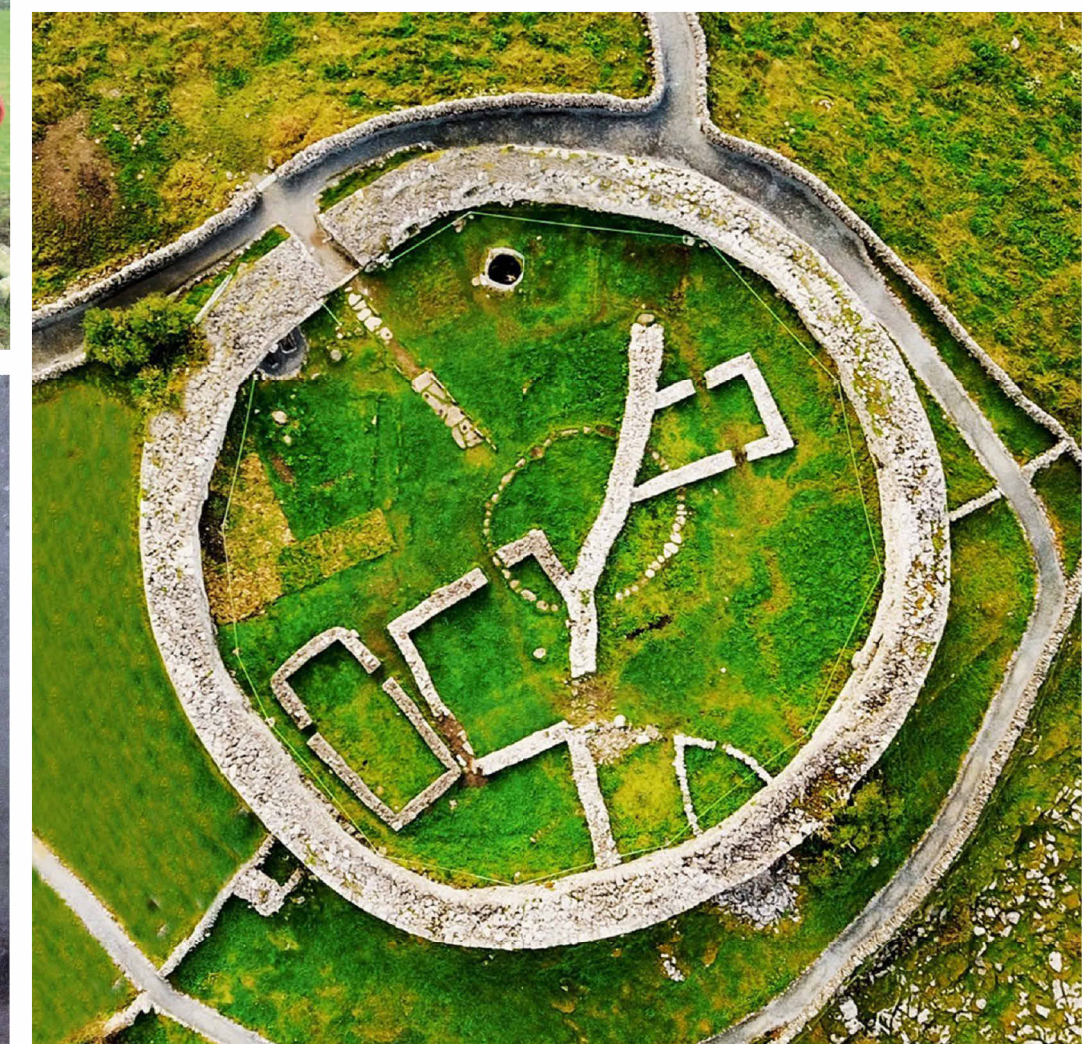
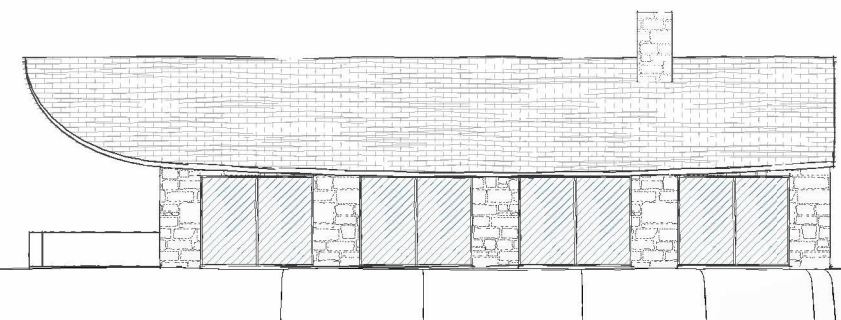
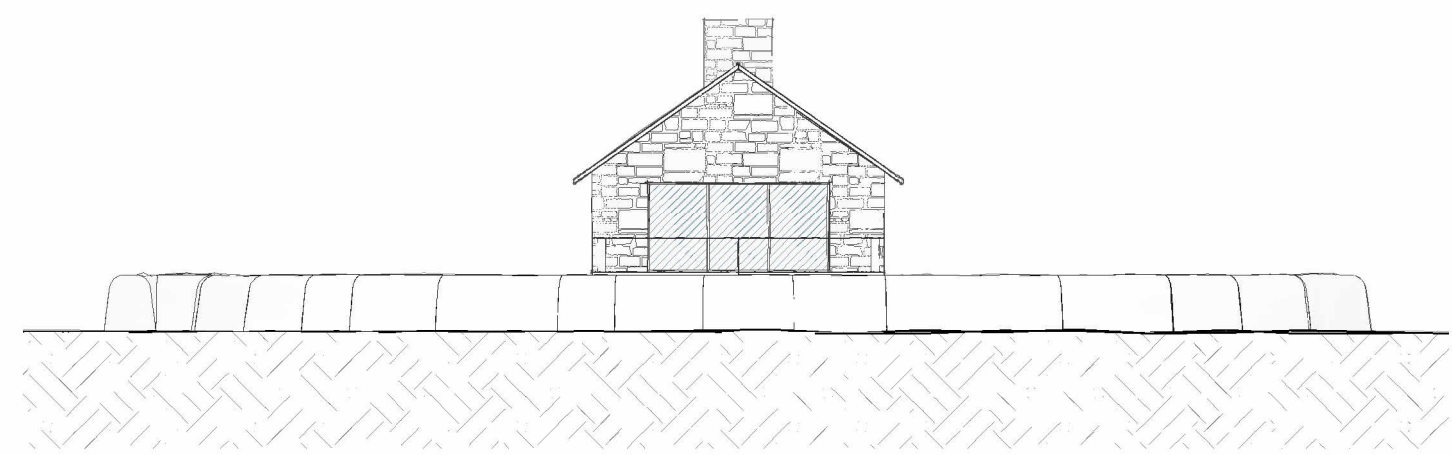
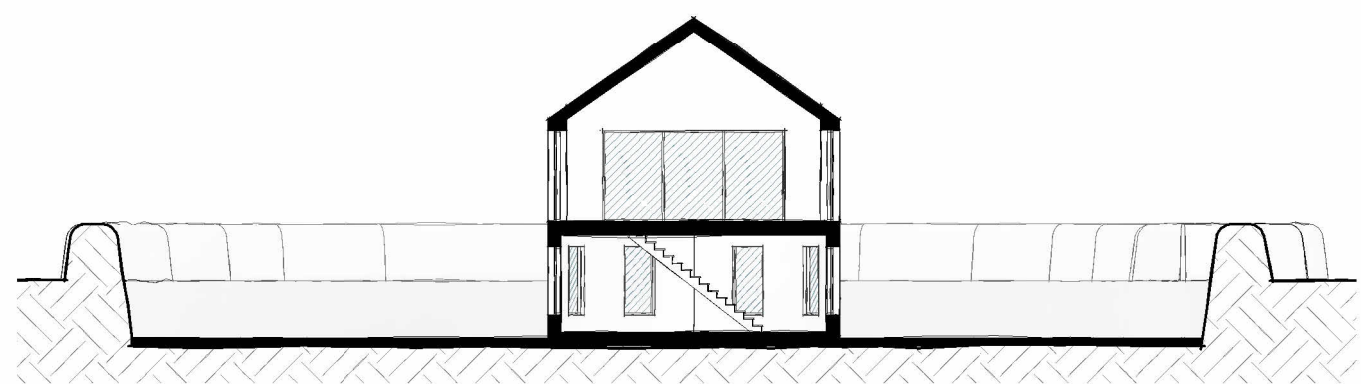
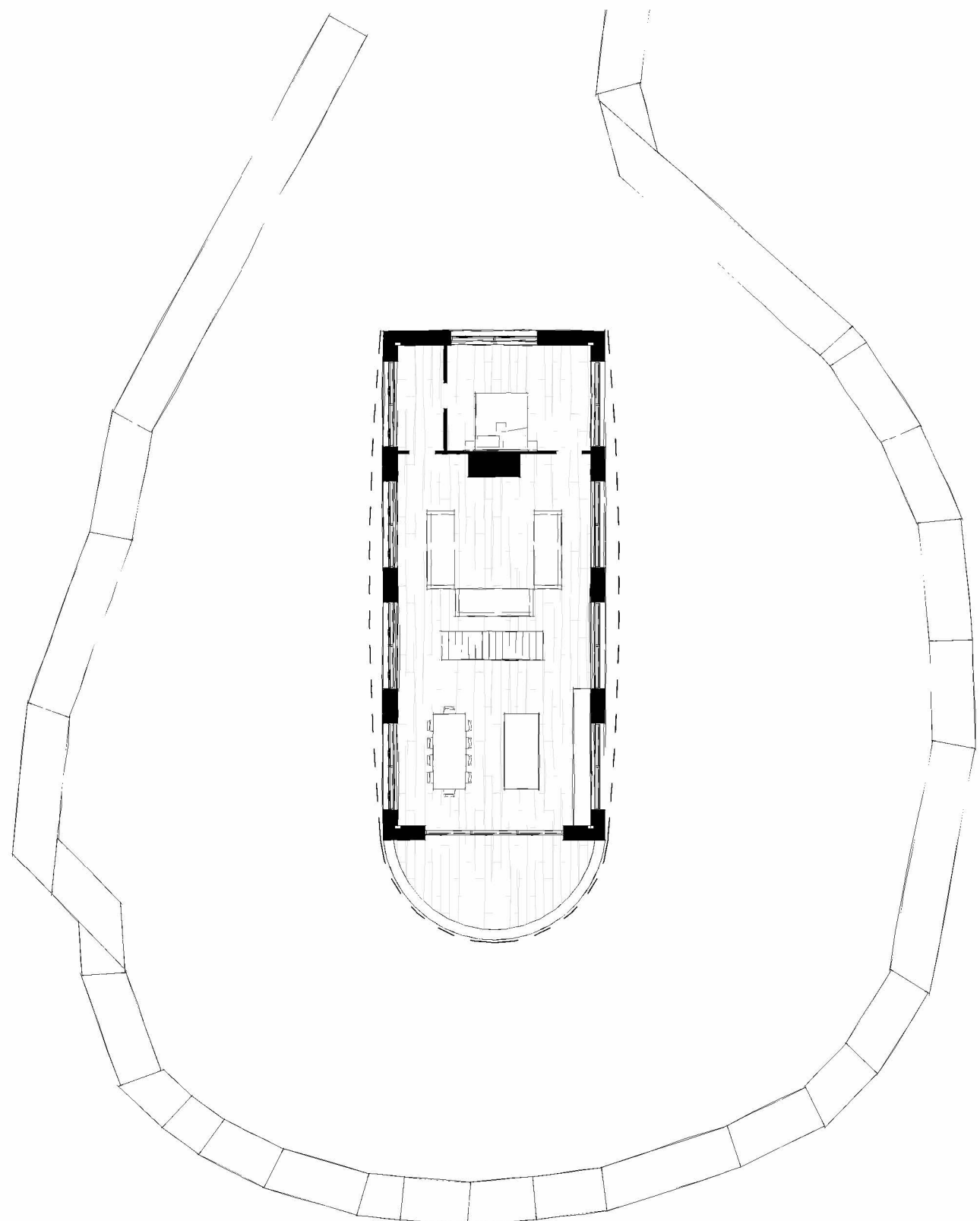
The houses are integrated into a landscape inspired from the ancient past. These organic shapes and patterns provide for a real authentic way of living, much removed from the rectangular parallels of the more modern divide.

Each home is situated within its own garden enclosure. Combined with the celebration of a low perimeter berm at the boundary edge, this helps to settle the buildings enthusiastically, while at the same time offering intimacy and protection from the elements, a place which allows all life to grow.

**SITE PARTICULARS:**  
TOTAL SITE AREA EDGED IN RED = 1.16 HECTARES  
OS MAP SHEETS : 4083-A



- Guest Parking
- Access Driveway
- Local Dry Stone Walls
- Proposed Houses
- All Native Planting
- Common Amenity Space



PL01 CONCEPT BOARD  
SCALE (@ A1): NTS  
PRELIMINARY  
DATE: MARCH 2022

DESIGN PROPOSALS FOR SITE AT  
BALLYVELLERY, LISCANNOR, Co. CLARE

**DAVID H. LEAHY ARCHITECTS**

No. 1, RIVERPOINT, LOWER MALLOW St., LIMERICK  
TELEPHONE: +353 (0)61-404400 E-MAIL: info@dhlarchitects.com

