

**From:** Eamonn Prenter <eprenter@csrlandplan.ie>  
**Sent:** Tuesday 3 January 2023 15:46  
**To:** Development Plan  
**Cc:** [REDACTED]  
**Subject:** Submission in Support of Proposed Amendmanet R6 of the Draft Clare County Development Plan 2023-2029  
**Attachments:** Submission in Support of Proposed Alteration R6.pdf

Sir, Madam,  
Please see submission on your proposed amendments to the Draft County Plan.

Please acknowledge safe receipt.

Regards,

Eamonn



**Eamonn Prenter** MIPI MRTPI  
Director

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CSR Ref: 96601CC/03012023

**CUNNANE STRATTON REYNOLDS**

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New Road,  
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Co Clare.  
V95 DXP2

3<sup>rd</sup> January 2023

**Submission by Email to [devplan@clarecoco.ie](mailto:devplan@clarecoco.ie)**

**'Proposed Amendments to the Draft Clare County Development Plan 2023-2029'**

**Submission in respect of lands now zoned R6 as a Proposed Amendment formerly zoned as TOU2.**

**Lands at Clarisford/Moys Townland**

Dear Sir / Madam

We make this submission on behalf of Mr Michael McHale, [REDACTED] on the Clare Draft County Development Plan 2023 - 2029 Proposed Amendments as they refer to lands previously zoned as TOU2 in the zoning map for Killaloe, Co. Clare and contained within Appendix 3 of the Draft Clare County Development Plan 2023-2029.

Our client wishes to record their full support for proposed alteration R6 which covers approximately 10 acres or 4 hectares of land located at Clarisford/Moys within Killaloe.

***The Subject Site***

The site the subject of this submission on the proposed alteration is shown in Figure 1 below. The site is located on the proposed western bypass of Killaloe and the River Shannon Bridge south of Killaloe and in fact the subject site could not be better located in respect of that much needed piece of strategic roads infrastructure for the town which will address many of the access and circulatory issues experienced in the town over many decades.

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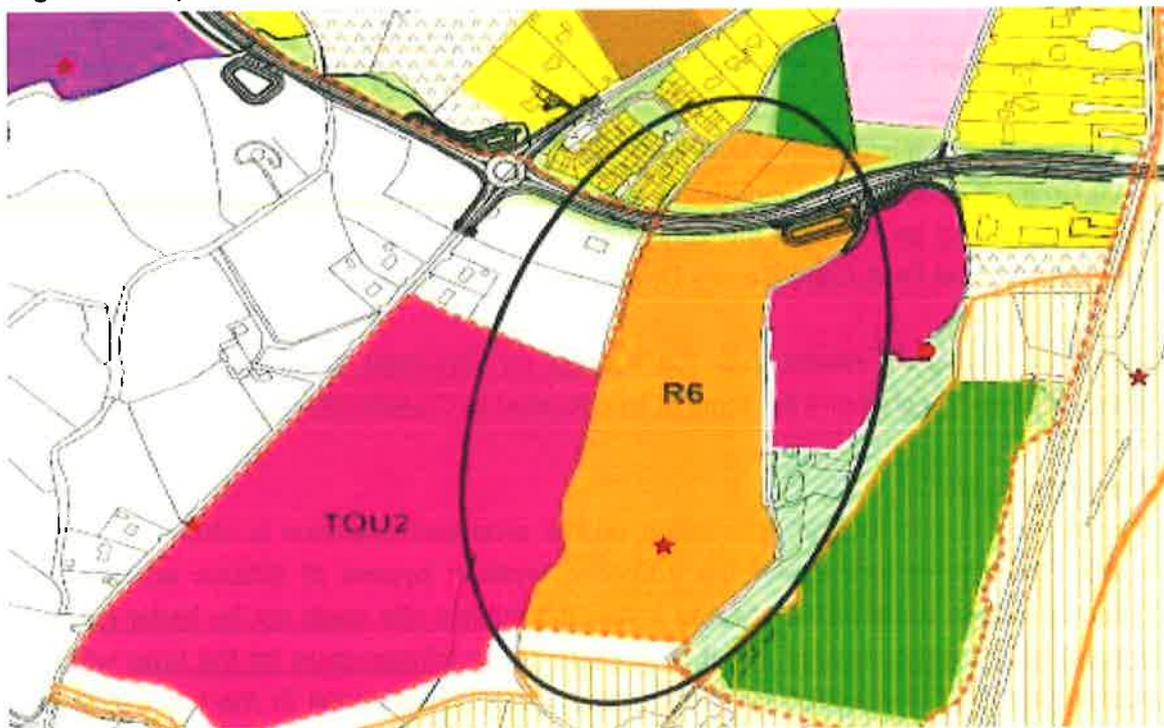
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As indicated above this is land that was previously identified for future tourism development having previously been zoned as TOU2 in the emerging County Plan. The principle of development, albeit non-residential development, has clearly been established for this site and it should be noted that a substantial amount of land under the TOU2 zoning remains in this location to meet the future tourism needs and potential of the town. The site cannot be considered unsuitable for development therefore in principle and is ideally suited to contribute to meeting the residential needs of the town.

The proposed bypass is clearly going to benefit the town substantially from an access and environmental perspective. The existence of the proposed bypass when completed will also clearly open up portions of land in close proximity to it for future development including this site that would have been previously constrained for future development purposes. Support is given to the fact that the County Council acknowledge in the emerging plan that temporary access may have to be provided initially. Our client acknowledges that direct access onto and off the proposed town bypass will be prohibited which does present an issue potentially with other sites but not this one.

**Figure 1: Proposed Alteration R6**



***Proposed Amendment R6 the subject of this submission***

There are but 3 no. new residential zonings proposed as amendments to the emerging County Development Plan 2023-2029. The first relates to the proposed expansion of R3 zoned land by a relatively small amount to accommodate further new residential. R3 is also located off the proposed bypass. The increase in this instance is relatively minor as can be seen in the proposed alterations booklet. The second extension to new residential zoned

land occurs in the proposed amendments at new R4. The R4 proposed amendment is located at Hill Road within the town. This is also a relatively small site in actual and absolute terms where the County Council's own proposed amendment text for this site states *'This is a small site within the settlement. The site is well-located to accommodate the future expansion of the town, being in close proximity to the town centre and all of its associated services.'*

The third site comprising residential development is R6. The rationale for the inclusion of R6 for new residential purposes is set out in the proposed amendment document, which is currently on public display, where it is stated as follows:

*'This site has been identified for residential development having regard to its strategic location adjoining the town of Killaloe. The zoning recognises the potential of these lands to accommodate development that will significantly contribute to the delivery of residential development within the town.'*

We would argue that site R6 is strategically located but is within the town, being located within the defined boundary of Killaloe, and was previously zoned meaning that is not adjoining the town of Killaloe as stated above but is very much within the town.

To accommodate future residential development on R6 that is consistent with the proper planning and sustainable development of the area the following development safeguards are retained by the County Council in the emerging County Plan 2023-2029 proposed amendments. These safeguards include the following:

- Development within Flood Zone A/B shall be retained for open space or other water compatible uses. A site specific Flood Risk Assessment will be required as part of the development proposals for the site.
- Provision of a masterplan for the entire site showing linkages to neighbouring developments and the surrounding area, proposed service provision and access routes to the site. The masterplan shall incorporate a habitat and species survey and an ecological assessment. These will inform the screening for Appropriate Assessment together with a Natura Impact Statement, should it be determined that an appropriate assessment is required;
- Provision for safe vehicular and pedestrian access to the site. Permanent and/or temporary access shall be addressed as part of a masterplan for the overall R6 site. Temporary access to R6 via unzoned lands may be considered in advance of the Killaloe bypass;
- These lands are adjacent to the Lower River Shannon cSAC (Site Code 2165). Given the extent of zoning at Killestry, it is imperative that there are no significant impacts on the adjacent ecologically sensitive shoreline adjoining the Lower River Shannon cSAC (Site Code 2165);

- Nutrient loading, siltation or any negative impacts on water quality must be avoided as these can have potential negative impacts on the aquatic ecosystems, e.g. fish habitat;
- A sufficient buffer zone shall be put in place between any proposed development on R6 and the European-designated site;
- Trees and hedgerows must be retained and maintained throughout the site where possible as these act as wildlife corridors;
- The hydrology of the site and subsequent potential impact on the adjacent cSAC must be taken into account at all times and this must be demonstrated as part of any planning application;
- Ground disturbance to the adjacent cSAC must be avoided;
- Due regard must be had to the flight path of bats in relation to the retention of trees. The migration paths and habitats of mammals, birds and fish along the Lower River Shannon must not be disrupted. Any future developments must not lead to the further spread of invasive species (Rhododendron and Japanese Knotweed) at this site; and,
- Proposals for development must demonstrate that suitable services and infrastructure, particularly relating to water supply and wastewater infrastructure, can be provided to serve the proposed development.

It is considered that all the above identified safeguards can be met, and will be met, and will ensure that any proposed development in this location will be consistent with the proper planning and sustainable development of the area.

However, please note that the strategic flood risk assessment undertaken by the County Council for the production of the emerging County Plan (Strategic Flood Risk Assessment Appendix 10c of the Draft Plan) shows this R6 site to be neither within Flood Risk Zone A or B. The flood map on page 117 for Killaloe refers. We would ask the County Council to review the flooding status of part of R6 therefore.

#### ***Our Support for Proposed Amendment R6***

Proposed Amendment R6 is supported by the following:

*Site R6 is located within the defined development boundary and was previously zoned for development*

The subject site is located within the defined, and by now well established, defined development boundary for the town. To accommodate the now proposed R6 zoning there is no requirement to extend the development boundary of the town as shown in Figure 1 above. The site was previously zoned in the Draft Plan for development as TOU2. The site is therefore capable of being developed and will be developed for housing.

*There is sufficient TOU2 zoned land remaining*

There are TOU2 sites located on either side of the site subject to the R6 proposed amendment. These remaining sites are considered sufficient to meet the tourism needs of the town. Whilst tourism is undoubtedly important to the future development of the town it should be noted that residential development, which has not occurred to anywhere near the required level over the last few years as set out below, must be provided as a counterbalance to the aforementioned tourism development to ensure a sustained, expanded and diversified tourism product for the town. Otherwise, jobs in tourism will be filled by people from other towns and rural locations encouraging commuting and unsustainable travel patterns into and out of the town. The joint provision of jobs and homes is supported in national and regional policy objectives.

*Census 2022 Preliminary Results indicate that population growth projections have significantly understated growth across the State*

In just the 6 years from the previous census in 2016 to the most recent census earlier this year there has been a growth in population of 361,671 within the State from 4,761,865 to 5,123,536. This is a growth in population nationwide of 7.6%. This is the first time since 1851 that the nations population has exceeded 5m people. This growth in the 6 years since 2016 is attributable broadly evenly to natural growth (47%) and net migration (53%).

It should be noted by comparison that there was an increase of over 120,000 housing units (6%) nationally over the same period (between 2016 and 2022). This means that population growth is exceeding the rate of housing provision nationally which means also that the gap between people looking for housing and that very provision is widening and not lessening.

The worrying picture evolving across the country is that the housing crisis is worsening. The ESRI population projections of 2020 that form the basis of the Minister for Housing, Local Government and Heritage's letter to local authorities of 18<sup>th</sup> December 2020; Housing Supply Target Methodology for Development Planning; and Appendix 1 to that letter also known as 'Projected Housing Demand by Local Authority Area 2020-2031' are based on outdated population projections. Doubt must be raised about these projections which form the basis of housing growth projections throughout the State including County Clare.

The Minister states in his letter to local authorities that '*The ESRI research provides a robust, up-to-date and independently developed housing demand projection, to inform policy and investment with regard to housing at national and local levels.*' In fact none of this is true. It is not robust. It is not even correct with the passage of just two short years. It is certainly found not to be up to date. The population growth nationally which has

exceeded all expectations is not only significant in its own right but must be supplemented by the unexpected arrival of 70,000 Ukrainians since February of last year which would not have been considered in the most recent census. The increase in population is therefore 430,000 people across the State in total. This is a very significant number which must be spread across the state and it is likely that more than just temporary accommodation will need to be provided for these Ukrainians.

The County Council may be aware that two of the largest housebuilders in the State, Cairn Homes and Glenveagh Properties, have legally challenged the Wicklow County Development Plan on the basis that that County Development Plan is based on out of date population data. Whether they are successful in the courts we believe it is indisputable that the population projections issued by the ESRI are out of date and do not form a sound basis for assessing housing need and consequently the amount of land to be zoned for residential development across the State including County Clare. Please see <https://www.irishtimes.com/business/2022/10/27/builders-challenge-wicklow-development-plan/>. This article in the Irish Times dated 27<sup>th</sup> October 2022 also states that *'Wicklow's 2022-2028 development plan complies with the National Planning Framework, whose projections are based on the 2016 census rather than the one that the Central Statistics Office completed earlier this year. Minister for Housing Darragh O'Brien will review the framework in the second quarter of next year in light of Census 2022's findings. He has indicated that this could lead to councils zoning more land for new home building.'* The same point applies to the emerging Clare County Development Plan.

The more recent Sunday Times of 1<sup>st</sup> January 2023 under the headline *'Housing crisis deepens amid target setback'* states the following, directly from the Minister, which further supports a more flexible approach to the zoning of land which would fully support the adoption of Proposed Amendment R6:

*'The housing minister has conceded that the government will struggle to hit its own housing targets next year.*

*The government is preparing to update its targets in the Housing for All strategy, with numbers expected to increase to account for the growth in Ireland's population recorded in Census 2022.*

*Under O'Brien's Housing for All plan, 29,000 new homes are to be delivered this year, with that figure rising to 33,450 in 2024.*

*We will be looking at revising [targets]. That will mean, as well, looking at how much land we have zoned across the country. Is it enough? I don't believe it is.*

*Despite about 28,000 homes being delivered over the year, 2022 saw homelessness levels rise to record highs, as did rent levels and housing prices.*

*Almost 70,000 Ukrainians have come to Ireland since February when Russia began its invasion, while the number of international protection applicants from other countries has also dramatically risen over the past 12 months.*

*O'Brien said ministers had to 'plan for eventuality' that many Ukrainian families would want to settle in Ireland long term.'*

The increase of 360K people in the State cannot be attributable to any Ukrainian influx as that occurred post census night. The additional 70,000 adds to the pressure for additional homes.

*Census 2022 Preliminary Results indicate that population growth projections have significantly understated growth across the County*

Population growth in County Clare reached 7.2%. Clare was the 2<sup>nd</sup> fastest growing county in Munster after Waterford whose growth reached 9.4%. Below Clare in levels of growth from 2016 to 2022 were Limerick (5.4%); Cork (7.1%); Kerry (5.1%); and Tipperary (5.1%). By comparison Galway County reached growth of 7.1%; Kilkenny (4.5%); Mayo (5.2%); Monaghan (5.6%); Offaly (6%); and Sligo (5.1%).

The ESRI/NPF population projection for Clare, and the basis on which housing growth was identified and consequently the basis for estimating the amount of new residential zoned land required for the County, has significantly underestimated growth for the County of Clare from which Killaloe will get its share. Table B.2. of the ESRI's Regional Demographics and Structural Housing Demand at a County Level which forms the basis of the Government's 'Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities' issued under Section 28 of the Planning and Development Act, 2000 (as amended) December 2020 and which includes Appendix 1 'Projected Housing Demand by Local Authority Area 2020-2031' identifies a population projection of 126,700 for the county in 2026 which has already been exceeded with the current (2022) population of 127,419 and which the county is well on the way to meeting the target of 129,500 for 2031. We need not remind the County Council that the population target for 2031 is not the target for the end of the currently emerging County Plan but runs well into the lifetime of the next statutory plan for the county covering the period 2029 to 2035. The population projections for Clare for 2026 upon which land is zoned in the emerging plan have already been reached and the projection for 2031 can be estimated to be reached in 2027 (at an established growth rate of

0.8% per annum). We believe that the above, based on actual population growth in the county supercedes Table 3.2 of the emerging County Plan and would indicate clearly and with recourse to empirical evidence that any suggestion that additional land should not be zoned in the emerging plan is wholly without foundation.

*Census 2022 Preliminary Results indicate that population growth projections have significantly understated growth for Killaloe*

Despite the infrastructural constraints in place over many years in the town the Killaloe's population has grown by a rate in excess of both the national rate of growth and the County Clare rate of growth over the period 2016 to 2022, indeed by a factor of 50%. This is clear from Tables 1, 2 and 3 below.

**Table 1: Killaloe Population Growth 2016-2022 (from the CSO Preliminary Census Results)**

A	B	C	D	E
Statistic Label	CensusYear	Electoral Division	UNIT	VALUE
Population - 2016		2022 Killaloe, Co.Clare, 16134	Number	2055
Population - 2022		2022 Killaloe, Co.Clare, 16134	Number	2281
Actual change 2016		2022 Killaloe, Co.Clare, 16134	Number	226
Percentage change		2022 Killaloe, Co.Clare, 16134	%	11

**Table 2: County Clare Population Growth 2016-2022 (from the CSO Preliminary Census Results)**

A	B	C	D	E	F
Statistic Label	CensusYear	Sex	County	UNIT	VALUE
Population 2016	2022	Both sexes	Co. Clare	Number	118817
Population 2022	2022	Both sexes	Co. Clare	Number	127419
Actual change since previous census	2022	Both sexes	Co. Clare	Number	8602
Percentage change since previous cen	2022	Both sexes	Co. Clare	%	7.24

**Table 3: National Population Growth 2016-2022 (from the CSO Preliminary Census Results)**

A	B	C	D	E	F
Statistic Label	CensusYear	Sex	County	UNIT	VALUE
Population 2016	2022	Both sexes	Ireland	Number	4761865
Population 2022	2022	Both sexes	Ireland	Number	5123536
Actual change since previous census	2022	Both sexes	Ireland	Number	361671
Percentage change since previous census	2022	Both sexes	Ireland	%	7.6

Table 1 above shows a population growth rate of 11% for Killaloe, Table 2 shows a population growth rate of 7.24% for the County and Table 3 shows a population growth rate of 7.6% for the State. We believe the above justifies the revised Table 3.4 Core Strategy Table as it relates to Killaloe and its future housing allocation which includes R6.

*There has effectively been an embargo on development in Killaloe since 2005 due to waste water capacity constraints which are now relieved due to the provision of a new treatment plant*

The existing wastewater treatment plant serving Killaloe has been at capacity since 2005 (that is a period covering 3 no. previous County Development Plans ie. the 2005-2011; 2011-2017; 2017-2023). During this extended period there has been no substantial residential growth and development stagnation has occurred in the town due to no wastewater capacity being available. Up to recently planning permission had been refused on grounds of inadequate wastewater treatment capacity or a planning condition along the following lines had been imposed as per ABP Reg. Ref. ABP-304310-19: *'No development of the proposed dwelling houses shall commence until the upgrading works at the Ballina Wastewater Treatment Plant to facilitate the development are completed, and the developer has obtained a Connection Agreement from Irish Water to connect into the upgraded Waste Water Treatment Plant.'* The effect of this lack of sewerage capacity has been an embargo on future residential development of much needed scale in the town which effectively means that it is starting behind many of the other towns in the county, in terms of growth projections based on past rates of growth. In other words, this capacity limited the town to low historic growth which has reduced the town's allocated future growth, which is highly ironic given that the barrier to development in the form of the waste water capacity is now, belatedly after many years, but actively, being addressed. The actual growth rate for the town 2016-2022 indicates a substantial reallocation of housing in the range 2,500 up to 4,500 commensurate with small town designation.

Pages 20 & 21 of Volume 3 of the Draft Plan states that infrastructural constraints are going to be alleviated or resolved over the short term and likely within the 6 year period following adoption of the emerging plan:

*'Wastewater from Killaloe is treated in Ballina and the existing wastewater treatment plant is currently operating at hydraulic capacity and cannot accommodate any further significant development. The planned upgrade of the Ballina WWTP is scheduled for completion in 2024 as set out in the Irish Water Capital Investment Programme. Until such time as the upgrade has been undertaken any future residential development is constrained.* (underlining is our emphasis).

*Killaloe and Ballina suffer from significant traffic congestion on the old bridge. A new Shannon river crossing, Killaloe by-pass and upgrade of the R494 was approved by An Bord Pleanala in 2012 to alleviate this problem. Advance works have now started on the project and the main construction period is expected to take approx. 3 years to complete. This Plan provides an Infrastructure Safeguard for the approved route of both the by-pass and the new river crossing. Completion of this project will transform Killaloe and Ballina by reducing travel time, improving the flow of traffic, reducing noise and pollution, improving environmental quality and providing opportunities for enhanced access.* (Underlining is our emphasis)

*The infrastructure and traffic management upgrades will provide considerable scope for future development in both settlements to meet the needs of current and future residents. Such development will include residential, community and employment-generating uses to ensure the sustained future growth of the linked settlements. The By-pass also presents an opportunity to revitalise and reconnect the town by re-imagining public spaces and connecting key landmarks with a strong focus on the pedestrian and cycle environment.*

We are pleased to give a further update confirming not only has Part 8 planning permission been granted but that contracts have been signed by Irish Water, the contractor and Tipperary County Council for the work to start with 'spades in the ground' tomorrow (4<sup>th</sup> January 2023) and for the works to be completed by 2025 which is midstream of the emerging County Plan. The Nenagh Guardian Newspaper as recently as last week refers.

*The position of Killaloe on the edge of the Limerick Shannon Metropolitan Area (LSMA) is such that its allocation of zoned land should be increased for residential purposes*

Much of the population increase identified in the emerging County Plan for the county is located within the metropolitan area. Killaloe is located just outside that metropolitan area and is sufficiently close to be considered a tourism centre for that metropolitan area and a centre that is capable of accommodating future development in a complementary manner to the focus on developing Ennis as the county town and the remainder of the metropolitan area within County Clare. It is significant in our view that the population target for the Clare LSMA is slightly under the population target set out in the RSES for the same area. This is because the outskirts of the Clare LSMA are currently constrained by a lack of wastewater treatment in Ardnacrusha, the lack of commitment in the Limerick Northern Distributor Road and severe traffic congestion in Athlunkard. It is stated on page 41 of the Proposed Amendment version of the emerging County Plan that the population allocation will be reviewed in future plan cycles. It is considered appropriate that an additional allocation of housing be set aside for Killaloe as the very same infrastructural and development constraints previously afflicting the town will now be a thing of the past with additional wastewater treatment capacity now generated, a bridge over the River Shannon now proposed, and a town bypass alleviating a long standing traffic congestion issue in the town.

*The provision of substantial residential development is required to ensure a sustainable balance between employment and provision of homes in the town*

Killaloe has the potential to be a tourism centre for Clare LSMA even though it is marginally outside. The town is an existing tourism centre and there is significant tourism zoned land to enhance its tourism offer. In providing that existing and enhanced tourism offer it is entirely reasonable to expect that the resident population will increase consistent with the stated County Development Plan Aims outlined in Section 4.1 of the emerging Plan which seeks to achieve balanced development within the county (in our estimation this means the balanced provision of employment/tourism with residential) and *'developing high quality and*

*vibrant settlements and the sustainable growth of these settlements proportionate to their scale and appropriate to their function and location within the county.'* Development of tourism will require additional people living in the town.

Table 3.4 of the Core Strategy Chapter allocates a proposed population increase of 148 persons for the period of the emerging 2023-2029 development plan for which the Council proposes an additional 77 housing units on 5.78ha. This is a relatively minor allocation inversely proportionate to the tourism potential of Killaloe and reflective of stunted growth for past infrastructural reasons as identified above. If tourism and leisure activities are to grow then housing opportunity needs to grow otherwise there will be unsustainable levels of commuting and travel to the town by workers and insufficient support to existing services and amenities the viability for which must be questioned. In addition, it is projected that enhanced water and foul services will be available in the area by 2025 at the latest.

The previously indicated population growth for Killaloe was a relatively paltry 148 persons reflective of past infrastructural constraints imposed on the town over many years which substantially reduce the population of the town which is in part a basis for establishing future projections.

The incorporation of R6 into the emerging plan is fully justified in the context of page 18 of the emerging plan which states that *'The growth projections are to be viewed as targets rather than caps or limitations to growth within those individual settlements. Where there is scope within settlements and appropriately zoned land available, planning decisions which may include growth over and above the stated target as set out in the core strategy will be considered.'* Underlining above is our emphasis.

*Notwithstanding the constraints imposed through lack of capacity of waste water treatment the other significant barrier to further development in the town including residential has now been removed with the planned provision of the new Shannon Bridge Crossing which will provide a direct link between the East Clare area and the M7 motorway*

The new Shannon Bridge Crossing is projected to be constructed during the lifetime of the emerging plan. The County Council will be aware that there is a contract signed between Clare County Council and John Sisk Limited on 3<sup>rd</sup> November 2022 for the new river crossing, the Killaloe bypass and the upgrade of the R494. The works for the above are to be completed by November 2025 with over three years then left to run on the emerging County Plan and are in compliance with Draft County Development Plan Objective CDP11.16.

*Proposed Amendment R6 is consistent with the advice contained in Ministerial Guidelines for Planning Authorities on Development Plans (2022)*

Section 4.4.1 of the Guidelines on Development Plans states that *'In all cases, whether phasing is applied or not, development plans must build in sufficient flexibility to ensure that*

*housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.'* Furthermore, it is stated in Section 4.4.2 that *'It is not the purpose of the planning system and the development plan process to facilitate the hoarding and speculation of serviced land. However, it is recognised that there is a need for some degree of competition and choice in the residential development land market and to ensure a future pipeline of well-located serviced land.'* In the next section of the same guidelines (Section 4.4.3) it is further stated that *'In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses) than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.'* It is concluded in this section of the guidelines that *'Accordingly, on a settlement by settlement basis, the precise extent to which zoned lands and sites in excess of that required to match the agreed housing supply target are provided, may be determined by the planning authority.'* The underlining above is our emphasis.

*Proposed Amendment R6 is consistent with the sequential approach advocated in the Guidelines on Development Plans (2022)*

The emphasis in all available planning guidelines and in the most recent Town Centre First strategy advocated by the Government is that town centres should be the focus for future population growth and that urban regeneration should be prioritised. Where town centre sites are unavailable to meet future development needs and population growth then sites further out should be considered. In this instance there are no town centre sites identified as being suitable to meet all the future needs and population growth of the town. The existing town centre is constrained in terms of challenging topography with a very fine grain to existing development, only relatively small sites potentially available, and in this case the provision of the bypass greatly enhances the ability of sites that are far less constrained to come forward for residential development including Site R6. Page 499 of Volume 1 of the emerging County Plan supports our synopsis on constraints to town centre development namely that *'The town core has been designated as an ACA. The street pattern in Killaloe today is very similar to that shown on the Grand Jury Map of 1787'* and therefore is physically constricted.

The location and extent of residential zoned land is shown in Figures 2 and 3 below. R6 is intended to be zoned along with Sites R1 to R5 inclusive and it is clear from the figures presented in this submission that all of R1 to R6 inclusive of our client's site can meet the future residential needs of the town. We would point out however that residential zoned Site R2 is currently constrained in terms of access.

Figure 2: Extract of Zoning Map A in the Emerging County Plan 2023-2029

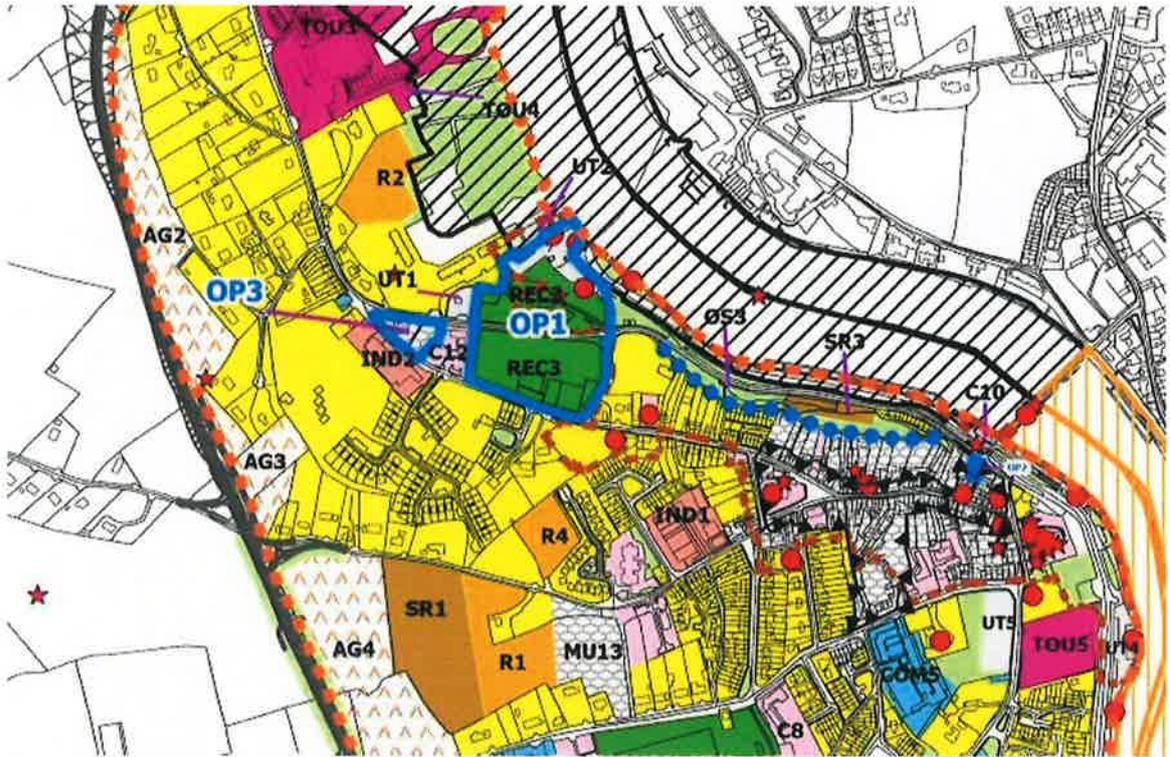
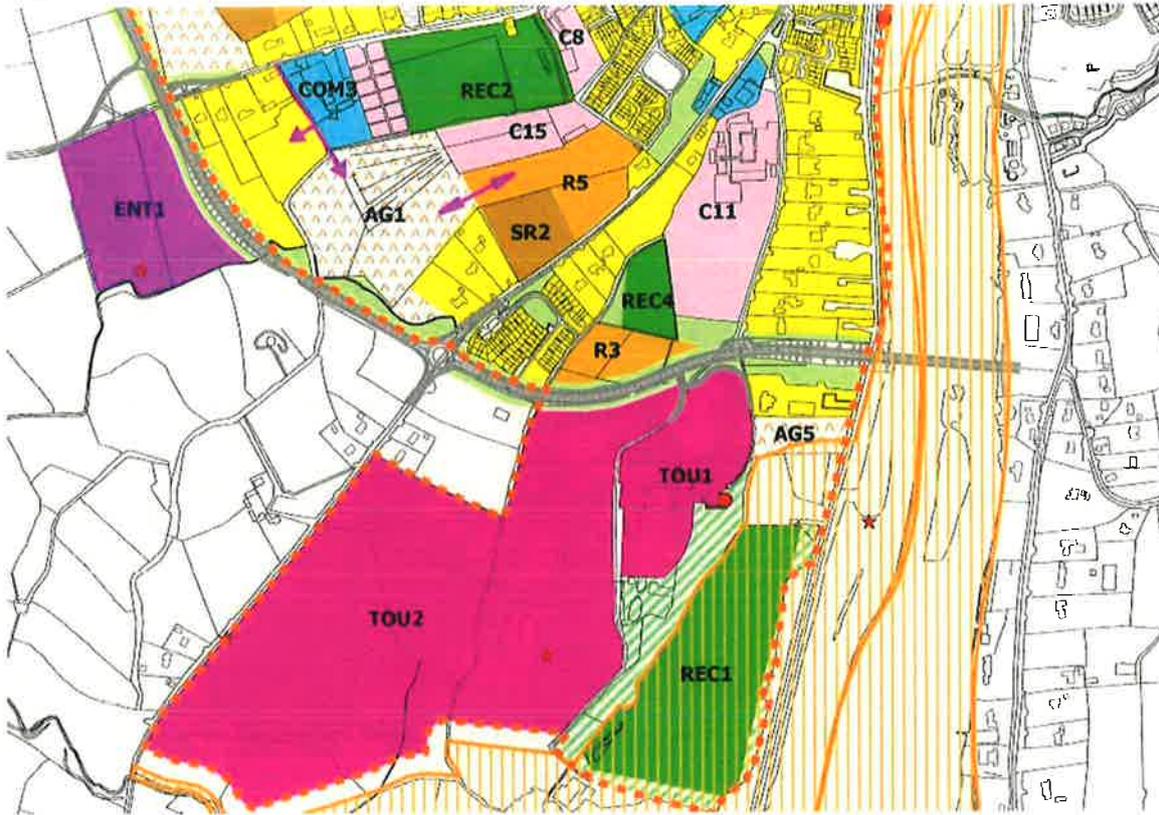


Figure 2 above and Figure 3 below also show agriculturally zoned land, also located within the defined development boundary of the town that could come forward for rezoning and ultimately development in future development plans. Sites zoned AG are likely to benefit from the completion of the bypass from 2025 and into the period of the next plan.

**Figure 2: Extract of Zoning Map A in the Emerging County Plan 2023-2029**



*Proposed Amendment R6 does not represent 'piecemeal' development frequently used against zoning proposals*

There is an acceptance in the emerging plan that lands are zoned for development south of the proposed bypass. In this regard there is already land zoned in the emerging plan for existing residential, tourism under TOU1 and TOU 2 and recreation under REC 1 all within the existing well established development boundary for the town. The proposed amendment R6 cannot be considered piecemeal as it is sandwiched between two TOU zonings and is a very attractive proposition for future housing for which there is a demonstrable need given the proximity to the town centre. We estimate Abbey Street to be less than 800m away which is within a 10 minute walk. As indicated above this is consistent with the 10 minute town concept advocated within the emerging County Plan. We would also point out that proposed amendment R6 is located a few minutes away from Clarisford Park (REC 1) which offers a wide range of recreational opportunities of an active and passive nature. In this regard Clarisford Park can be considered a recreational area of town wide significance and importance. It makes sense therefore from a planning perspective to locate much needed residential development close to it, where maximum use and enjoyment can be experienced of this town asset.

*This is an ideal location for residential development*

Demand for single rural housing may be reduced if sufficient supply of attractive and affordable homes in rural towns and villages is available. We suggest the provision of

residential land in this area will increase housing supply and choice, thereby reducing the demand for single rural dwellings. We believe this location close to the town centre with capacity for residential development will offer a controlled and sustainable option to those who do not meet rural housing needs criteria in Killaloe.

The site also adjoins Clarisford Park playing pitches which allows areas for children to play. There is also ready access to heritage areas and natural landscapes as acknowledged in the emerging plan. There is ability to access the site from two directions the most northerly a short 10minute walk from the town centre consistent with the concept set out in the emerging plan of the 10 minute town where everything required for sustainable day to day living is located within a ten minute walk of a site.

### ***Conclusions***

Proposed amendment R6 is supported for the following reasons.

- **All R zoned sites (R1 to R6) can accommodate future population growth in the town.**
- **Agriculturally zoned (AG) sites can come forward in further development plans once the town bypass has been constructed.**
- **The principle of development on this site is acknowledged in the former TOU2 zoning for this site in the earlier Draft County Development Plan as is the principle of development south of the bypass.**
- **The proposed bypass will greatly improve access to previously unzoned lands within the town including this site.**
- **R6 has the benefit of being located immediately close to Clarisford Park which can be considered a park for the whole town with a variety of active and passive recreational activities for the town and nearby development.**
- **R6 is within less than 800m of Abbey Street and its zoning for residential is consistent with the concept of the 10 minute town which is a prominent concept within the emerging plan.**
- **The emerging County Plan acknowledges for R6 and TOU2 that temporary access may have to be, and can be, provided in the interim before the bypass is fully constructed.**
- **R6 is located strategically located within the town.**
- **Safeguards for future development on the R6 site that are listed within the emerging Plan can all be met to ensure the proper planning and sustainable development of the area is achieved and all the sensitivities of the area respected.**
- **Infrastructural constraints that have severely limited or prevented development in the town over many years have finally been addressed with work on the wastewater treatment plant in Ballina commencing on 4<sup>th</sup> January 2023 (tomorrow) and work on the town bypass projected to start later this year and to be completed by November 2025. There is little point in these barriers to**

development being finally resolved if the development potential of the town, and much needed homes are not provided, in a period of a current and worsening housing crisis.

- Homes and resident population are needed to serve the fantastic tourism product that the town has to offer otherwise there will be highly undesirable and unsustainable commuting level reached into the town. Homes are needed to sustain economic development locally as well as nationally.
- Population projections across the State have substantially understated the actual population growth occurring within the State, the county and in Killaloe. Despite what has been effectively an embargo on substantial development in the town through lack of infrastructure capacity, the population growth experienced in the town at 11% in the period of just 6 years from 2016-2022, exceeds growth rates of 7% in both the county and across the whole State. Growth in Killaloe is in fact 50% greater than growth in both Clare County and the State. This and previous infrastructural constraints warrant maximising the zoning of residential land in the town.
- Population projections by the ESRI have been identified as understated at best and incorrect at worst. The housing allocation for the County and consequently for Killaloe imposed by the Department in Ministerial Guidelines and Ministerial letter/circular based on those projections is flawed. Numerous County Plans recently adopted have been legally challenged on the basis of these outdated now proven incorrect population projections.
- The Minister for Housing has acknowledged that the targets in Housing for All will not be met and that the amount of residentially zoned land across the State will have to be reviewed. Press releases and newspaper headings quote above refer.
- Population projections for 2029 will be reached years ahead of time.
- R6 is fully justified in terms of actual population growth and the status of Killaloe as a designated small town where populations of 2,500 to 4,500 have been identified for such settlements. It makes sense for the towns potential to be maximised given actual population growth and historic infrastructural constraints.
- The waste water treatment plant extension will be commenced tomorrow and will be operational mid plan.
- The town bypass will be complete by November 2025 also mid plan.
- The circumstances of R6 are that it cannot be considered piecemeal.
- The Ministerial Guidelines for Development Plan state that the precise extent to which zoned lands and sites in excess of that required to match the agreed housing supply target are provided, may be determined by the planning authority. The County Council should exercise that discretion for the reasons identified above.

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

If the County Council require any clarification or elaboration on the above please do not hesitate to contact the undersigned.

Yours sincerely,



**Eamonn Prenter** MIPI MRTPI

Director

**CUNNANE STRATTON REYNOLDS**

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