

Development Plan Review,
Planning Department,
Clare County Council,
New Road,
Ennis,
Co Clare.
V95 DXP2



Date: 12th November 2020

Re: Development Plan Review,

1. I, Andrew Hersey Planning Consultant MIPI, am acting on behalf of my clients: *Dun Ri Management Company*. My clients are the residents of Dun Ri - a new housing development located adjacent and to the east of the Bunratty Manor Hotel. There is currently a planning application lodged with Clare County Council for a housing estate located on lands to the south of their estate under Planning Reg. Ref. P19-939 for

Permission for a development comprising 48 no. residential units, (14 no. detached houses, 28 no. semi detached houses, 6no.terrace houses), ancillary surface car parking, vehicular, pedestrian access to the proposed development via a new junction off Bunratty West Holiday Village connecting to the L3126, connection to existing public water supply; foul water drainage services including the provision of surface water attenuation and all associated site development and landscape works on lands. The planning application is accompanied by a Natura Impact Statement

It is noted that the applicants responded to a further information request on this application on the 8th October 2020. I note from the documentation lodged that there are now 41units proposed.

Notwithstanding, the fact that the site is zoned as 'Residential' in the current Clare County Development Plan 2017-2023, my clients are opposed to a development on this site of the scale and density proposed, and any significant further residential development on a singular site in Bunratty in general within the lifetime of the current plan and subsequent development plans. My clients therefore wish to make a submission regarding future housing and population targets for the village and implore that the planning department put objectives in place for Bunratty that promote the development of infill and brownfield sites over greenfield sites in line with national and regional planning policy.

2. A fundamental principal of proper planning and sustainable development is that sustainable transport is inextricably linked to land use. Residential housing should be located where there is good public



transport, and safe pedestrian and cycle links to village, town and city centres, transport hubs, services and amenities. This principal encourages walking and cycling, the result being that dependence on the private motor vehicle is reduced. This fundamental planning principal is set out in ministerial ***Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009***. The principal focus of these guidelines is the provision of sustainable residential development and the promotion of development that prioritises walking, cycling and public transport, and minimises the need to use cars

3. Bunratty village presently has little to offer in terms of services for future residents. The existing preschools, primary and secondary schools are not only at capacity but they are not within commuting distance by walking or cycling. There is no secondary school in the wider parish of Newmarket-on-Fergus. In addition there are no off road and safe walking and cycling routes in the village to cater for the needs of an enlarged resident population. There are no significant shops or other services in the village to serve any increase in population. Any increased residential population in the village will therefore result in such residents commuting by private motor vehicle for any services that they require and as such any proposals for development which will result in increased population would be contrary to regional policy and national planning guidance
4. My clients would welcome a modest population increase during the life of the forthcoming development plan which would serve the needs of an incrementally growing local population.
5. Bunratty is designated as a *Large Village* in the current Clare County Development Plan 2017- 2023, being the statutory development plan in force for the village at present. The Core Strategy for the county proposes population targets for each town and village within the county and then sufficient lands are zoned for residential use to meet those targets. Table 2.4 (page 31 of the Plan) sets out a population increase of just 99 persons for Bunratty up to 2023 which equates to 36 further households
6. I refer to a recent planning decision in the village on a site located to the west of the proposed development site in the Bunratty West Holiday Village. Permission was recently granted on this site for a *change of use of an existing 28-house estate from use for short-term tourist occupation only to general residential use*. (P18-919 applies) I note that Clare County Council granted permission subject to conditions and Condition 2 of the said conditions states that these units are for the purposes of permanent residential occupation and not as short term tourism accommodation or for the purposes of short term letting.
7. In effect this decision means that 28 residential units are now available in the village and provides housing to meet the requirements of the proposed permanent population increases set out in the core



strategy. The core strategy sets out an increase in population of just 99 persons up to 2023 which equates to 36 households. By granting the proposed development therefore and under the terms of the core strategy there is only a requirement for a further 8 houses in Bunratty within the lifetime of the current plan.

8. I also refer to the 6 houses built recently in Dun Ri Housing Estate. These houses are now built. In this respect, there is only a need for 2 further houses required in Bunratty to meet the population targets set out in the Core Strategy up to 2023.
9. My clients question the requirement for any further housing in the village over the lifetime of the current plan and the forthcoming Clare County Development Plan 2022-2028. However, considering a similar increase in population between the years 2022-2028 of 99 persons or 36 households, my clients are of the opinion that these houses should be spread out across the village rather than be developed on one singular site. This way the village grows organically. In this respect, my clients urge the planning authority not to zone large tracts of land which result in the development of large housing estates which are out of context with the village. The site located to the south of Dun Ri zoned for residential use, and which is subject to the current planning application, P19-939 refers, is one such large tract of land zoned under the current plan and which if developed will result in a singular housing estate which is out of context with the village and which will greatly exceed the population increases set out in the current core strategy for the village. In this respect, my clients wish to see large tracts of land which are currently zoned for residential use omitted from any future development plan for the village.
10. I refer to:
 - (i) ***The National Planning Framework 2040*** is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040 and
 - (ii) ***The Regional Spatial and Economic Strategy for the Southern Region 2019-2031*** which provides a high-level development framework for the Southern Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government.
11. Both of these high level plans prioritise the development of Infill and Brownfield sites in city, town and village centres sites over greenfield sites in the periphery. The ***National Planning Framework 2040*** under Section 4.5 '*Achieving Urban Infill/Brownfield Development*' states



The National Planning Framework targets a significant proportion of future urban development on infill/ brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.

Additionally, RPO 34 of the ***The Regional Spatial and Economic Strategy for the Southern Region 2019-2031*** sets out policy with regard to targeting infill and brownfield sites for development over greenfield development sites.

12. There is a significant derelict property in Bunratty village which has been an eyesore in the village since it closed down in 2009. The site of the former Shannon Shamrock Hotel could be developed for residential or for mixed use purposes. I note that the site comprises of 3.41ha which is significant and the development of housing on even a portion of it would meet the requirements of any proposed population increase in Bunratty for at least two development plan cycles if not more depending on the population allocations for the village. In order to adhere to compliance with national and regional plan policies, it is therefore considered that there is an onus on the council to resolve the dereliction issue and prioritise the rehabilitation and development of this site over and above any other greenfield site in the village
13. Bunratty has always had a strong identity with tourism, based around Bunratty Castle (designated as a National Monument) which has been identified and supported in the Clare County Development Plan 2017-2023. In addition, it is understood that there are forthcoming proposals by Shannon Development to increase visitor numbers in the village from 500,000 to 700,000 visitors. My clients have concerns that any large residential development which does not respect the character and scale of the village will have a negative impact upon the strong tourism context of the village and will make Bunratty a less attractive destination for visitors. There needs therefore to be a balance struck between sustainable residential growth whilst at the same time protecting the tourism context of the village.
14. The historic status and character of the village should inform future development and design, so the character of any new development is a reflection of the locality and what has gone on before. This is achieved through good modern and innovative design that complements the area, has an evolutionary pace and ensures engagement and investment by residents; the alternative is abrupt changes in the character and composition of the village.
15. Future development should be balanced, acceptable in terms of density, accessibility, function and scale to create active, memorable places to live and thrive.
16. With respect of the above, therefore, I, Andrew Hersey MIPI urge the council:
 - (a) to comply with national and regional policy with regard to infill and brownfield sites and prioritise the development of these sites over greenfield sites and de-zone large tracts of land which are



currently zoned for residential purposes in Bunratty, in the current Clare County Development Plan 2017- 2023.

- (b) that future residential development is at a sustainable level that does not damage the tourism potential of the village.
- (c) that policy with regard to compliance with the core strategy be strengthened so as to prevent the planning authority from permitting development that contravenes their own core strategy,

If you have any queries regarding the same please contact me at [REDACTED] or by email at [REDACTED]



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