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## 1. Introduction

Clare County Council has invited submissions, by Monday, 16<sup>th</sup> November, on the preparation of the 2022- 2028 county development plan. The Construction Industry Federation welcomes the opportunity to make a submission. The plan will be part of the first batch of development plans made under Project Ireland 2040, the new planning regime brought into effect by the National Planning Framework (NPF) and National Development Plan, adopted in 2018. The Framework is described as ‘a high level strategic plan for shaping the future growth of our country to the year 2040.’<sup>1</sup> The National Development Plan is a 10-year strategy of public capital investment that underpins the NPF.

The Framework envisages an additional one million people in the country by 2040, the need for an additional 550,000 homes and a need to plan for an additional 660,000 jobs. It plans to accommodate a quarter of the additional population in Dublin, another quarter in the four cities of Cork, Limerick, Galway and Waterford and the remainder in designated regional centres and in towns, villages and rural areas. The local authority development plans (and local area plans), which will be rolled out over the next two years, will form the local, detailed spatial level of the new plan system.

For the first time, the context for the making of development plans is dominated, not by the framework of existing development plans, but by the policies of higher order plans and policies decided at national and regional levels. These are primarily, at national level, the NPF and National Development Plan, accompanied by Statutory Guidelines (Section 28 Guidelines<sup>2</sup>), and, at regional level, Regional Spatial and Economic Strategies (RSESs), which incorporate Metropolitan Area Strategic Masterplans (MASPs) for the cities.

The NPF as it relates to the Southern Region, and the RSES for the Southern Region, envisage a somewhat more diminished development role for County Clare than applied under the previous National Spatial Strategy (NSS). In the NSS Shannon town was part of the Limerick-Shannon Gateway and Ennis was one of nine medium sized towns designated as hubs to drive balanced regional development throughout the country. The NPF aims to achieve a more concentrated pattern of urban development, and to that end, while Shannon retains its special development status, now as a constituent part of the Limerick-Shannon MASP, Ennis is assigned a somewhat reduced role as a regional ‘key town’.<sup>3</sup>

The lesser development role of the county is reflected in the population targets that have been set. While the population of the southern region as a whole is projected to grow by between 12 and 15% between 2016 and 2026, the population of Clare is projected to grow at a lower rate, by between 8.8 and 10.5% over the same period.<sup>4</sup>

The Southern Region RSES allocates a much lower population growth rate to Clare (between 0.85 and 1% per annum over the period 2016-2026) than the current development plan assumes (1.71%

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<sup>1</sup> Government of Ireland (2018) Project Ireland 2040: National Planning Framework, page 10

<sup>2</sup> Such as Sustainable Residential Development in Urban Areas (2008) and Sustainable Urban Housing: Design Standards for New Apartments (2018)

<sup>3</sup> It should also be noted that Sixmilebridge is now included in the MASP which is the first time this commuter settlement is recognised as part of the metropolitan area.

<sup>4</sup> Data derived from Southern Region RSES, Appendix 1

per annum over the period 2011 to 2023), i.e. as little as half the growth rate is assumed for the immediate future<sup>5</sup>. While the current county development plan envisages the county having a population of over 143,000 by 2023 the RSES has a target population of about 130,000 by 2026. This is a 'top-down' strategic planning framework that will be regulated by the newly established Office of the Planning Regulator. The County will have to adjust its ambitions to this new reality.

This submission is in two sections; a first section which sets out broad methodological issues and a second section which outlines what we consider to be strategic local priorities. The methodological issues are as follows:-

- Comprehensive review on the supply of developable land to inform zoning decisions,
- Comprehensive information about the policy and investment framework at the county level to enable development in the plan period, and
- A fully integrated local-level approach to infrastructure planning for the Limerick- Shannon MASP.
- Appropriate standards for the calculation of development demand, and
- An appropriate approach to phased zoning.

The local strategic issues to which we would like the Council to give detailed consideration are:-

- The need to facilitate compact, urban growth in the county,
- The importance of Ennis as an urban centre and therefore the importance of a development focus on Ennis,
- The importance of Limerick-Shannon-Ennis as an established economic corridor, 'the economic engine of the Mid-West',
- The importance of Shannon as an economic driver, but also as a potential drag on development, and
- The need to meet a demand for lower density housing in villages and smaller towns.

## PART 1: METHODOLOGY

### 2. Comprehensive information on the supply of developable land

There is no information about the availability of developable land in the issues paper published by the council for public consultation. Given the emphasis of the NPF and RSES on compact development, of concentrating development within existing urban areas and of maximising the use of brownfield sites, there is a risk that the quantum of available developable land will be overestimated because insufficient research is carried out on measuring existing constraints.

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<sup>5</sup> Clare County Development Plan 2017 - 2023

For example, a large area of zoned land in Ennis is at flood risk (See Fig 1). The Council cannot simply rely on totalling existing zoned but undeveloped land as a measure of development capacity. It needs to conduct a thorough survey of zoned land prior to next January as part of the development plan review (as per Appendix 2 of the National Planning Framework). This will include a written infrastructural assessment in relation to Tier 2 zoned lands. We request this survey and assessment are carried out to a high technical standard and that the results of the assessment are presented in an accessible and readily comprehensible format.

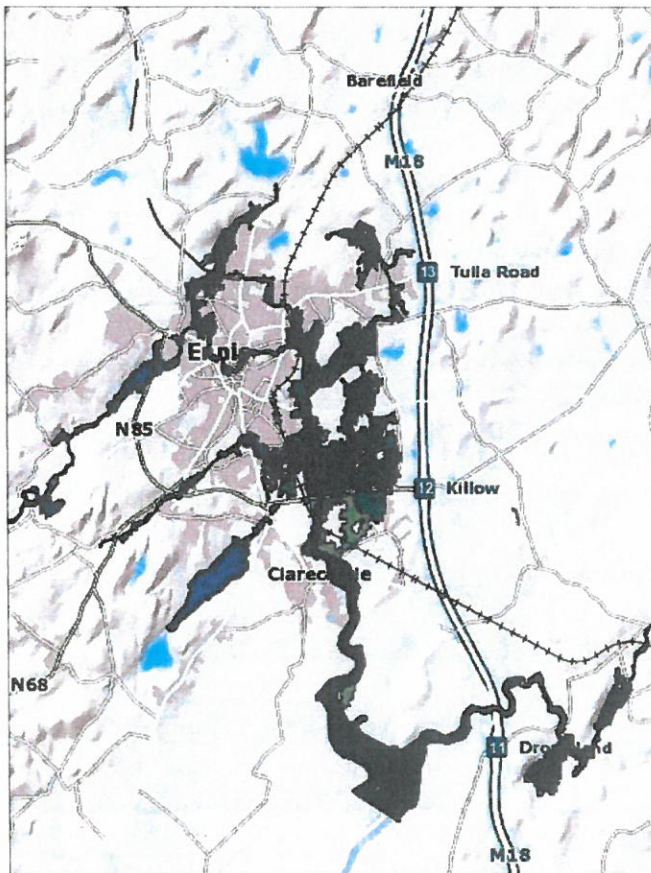


Figure 1  
Areas at flood risk in Ennis

Map derived from flood maps on [www.floodinfo.ie](http://www.floodinfo.ie). The dark shaded areas are areas where there is a medium or high risk of river flooding

Care must be taken to ensure that adequate land is zoned and supported with the necessary infrastructure, not just to accommodate future demand but to facilitate demand which has yet to be realised as a legacy of the previous recession and the subsequent policies and economic circumstances which have prevented the realisation of housing to meet demand.

Land costs can be a significant element of housing delivery costs and a limited supply of available serviced and zoned land is directly reflected by increased costs and increased house prices which are “ultimately borne by the buyer”.

Developments will not be progressed if the construction industry cannot demonstrate financial viability to the investment sector. Viability of developments will be heavily dependent on an adequate supply of serviced, affordable, developable land in addition to the market demand for residential units. Demand specific to unit type is an important consideration in this regards as is clearly justified density specific zoning policies.

### 3. Comprehensive information about the policy and investment framework

It is highly desirable that the county development plan gives full expression to both the spatial and financial dimensions of the national strategy as well as to the local components that are consistent with and relevant to that strategy. We hope that the development plan can function as a 'one stop shop' to enable development-related decisions to be taken. This means that the plan should include all of the following:-

- Details of all County Clare infrastructural projects financed under the National Development Plan, i.e. location, capital costs, implementation schedule to be commenced or completed within the period of the county development,
- Details of all infrastructural feasibility studies to be commissioned by the local authority and by other state bodies in relation to Clare,
- Maps to show the location of all public land in urban areas that is not currently in use and therefore comes under the purview of the Land Development Agency, and
- The investment programme of the Land Development Agency in County Clare

In addition, County Clare projects being funded or to be funded under the following should also be described in the plan, including:-

- The Irish Strategic Investment Fund managed by National Treasury Management Agency,
- EU funded programmes,
- The Urban Regeneration and Development Fund administered by the Department of Housing, Local Government and Heritage,
- The Rural Regeneration and Development Fund administered by the Department of Rural and Community Development,
- The Climate Action fund administered by the Department of Communications, Climate Action and Environment, and
- The Disruptive Technology Fund administered by the Department for Business, Enterprise and Innovation

#### 4. A fully integrated local-level approach to infrastructure planning for the Limerick-Shannon MASP <sup>6</sup>

The Limerick-Shannon MASP area is the centre of the slowest growing Strategic Planning Area (SPA)<sup>7</sup> in the region<sup>8</sup> and the Limerick-Shannon MASP has been the slowest growing MASP area in the region.<sup>9</sup> There is little doubt that effective planning of the Limerick-Shannon MASP has been, and will continue to be, hampered by the involvement of several planning authorities without a sufficient level of coordination, unless the new planning regime can follow a different approach. Sharing the same river valley, road and rail networks there is an obvious need for an integrated approach to the MASP. The majority of the 23 RPOs<sup>10</sup> in the MASP implicitly or explicitly require a collaborative approach.

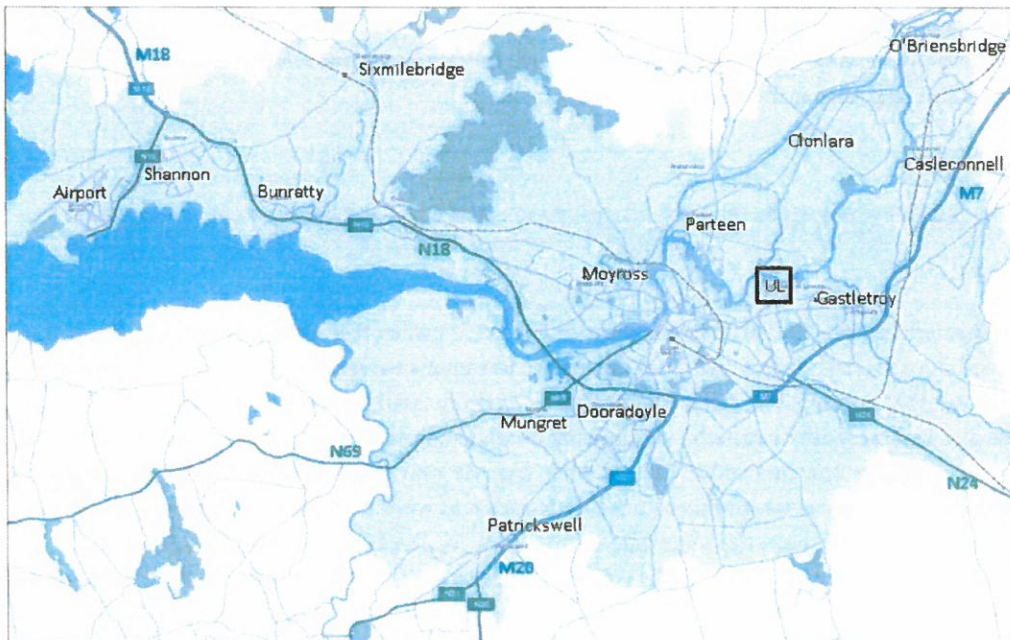


Figure 2. The extent of the Limerick-Shannon MASP

By way of example, the Regional Flood Risk Appraisal (RFRA) states that 'Planning authorities that share administrative boundaries should identify areas where there is potential for joint studies to ensure that all flood risk issues are captured to inform their preparation of spatial plans. Where it is found to be necessary the planning authorities should prepare joint studies to address flood risk issues<sup>11</sup>.

<sup>6</sup> MASP, Metropolitan Area Strategic Plan

<sup>7</sup> Mid-West SPA, formerly Mid-West Region

<sup>8</sup> A 6.6% growth of population between 2006 and 2016, compared with a regional growth of 9.9% and national growth of 12.3% (Source: Southern Region RSES)

<sup>9</sup> 5.6% population growth between 2006 and 2016 compared with Waterford and Cork MASP's growing by 8.2% and 12% respectively (Source: Southern Region RSES)

<sup>10</sup> RPOs; Regional Policy Objectives

<sup>11</sup> Regional Flood Risk Appraisal by RPS for Southern Assembly, page 35

The RFRA states that of the 17 locations identified for future economic growth within the Limerick-Shannon MASP, 7 locations lie in Flood Risk Zones A or B, and only 2 of those locations have flood defences in place providing only partial protection.<sup>12</sup> The RSES states (in Section 9.3) that, before the end of the year the Southern Regional Assembly will establish ‘robust structures cross-sectoral stakeholder and cross-boundary local authority steering group committees for the implementation phase to ensure the delivery of the RSES and MASPs... (RPO 226)’

Notwithstanding the regional assembly initiative, the county development plan process is an established means for formulating and disseminating spatial policy at a local level. The county development plans for the two constituent parts of the Shannon and Limerick MASP are in preparation at the same time and both are being formulated within the policy framework of Southern Region RSES. For these reasons we suggest that, in coordination with the inter-authority implementation structure too be set up by the Assembly, the Limerick and Clare county development plans contain an identical chapter on Infrastructure Development for the Limerick-Shannon MASP. In our opinion this would have several benefits. It will bolster local democracy, mitigate policy conflict and overlap, and facilitate implementation.

## 5. Appropriate standards for the calculation of residential development demand<sup>13</sup>

A recently published report illustrates the great difference between the growth of housing demand in Dublin and in other Irish towns and cities during the last inter-censal period.<sup>14</sup> Figure 3, from the report, shows that housing demand in Dublin has been dominated by households classified as ‘crammers’. Crammers are households comprising unrelated parties. It can be seen that crammer households dominate new demand in Dublin while they are only a small proportion of the demand in smaller cities and towns where other households with and without children comprise the bulk of the demand. This, we suggest, has important implications for the application of the density and apartment guidelines and should be fully taken into account when housing policies are drafted for the plan.

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<sup>12</sup> *ibid.* page 34

<sup>13</sup> MASP, Metropolitan Area Strategic Plan

<sup>14</sup> Ronan Lyons Identity Consultancy (August 2020) Ireland’s Housing Need and Policy Options





Fig 3 Change in the number of households between 2011 and 2016 Source: Ronan Lyons Identity Consultancy (August 2020) Ireland's Housing Need and Policy Options

We request that, while the consultation paper issued makes it clear that most of the county towns and large villages will be subject to local area plans (LAPs) after the development plan is made that the development plan includes a comprehensive template for development policy in the smaller settlements.

The 2020 housing report already cited found an even greater difference between housing demand in Dublin and demand in smaller towns and villages (See Fig 3). In this regard we request that particular attention is given to the guidance in Chapter 6 of the 2009 guidelines for sustainable residential development in urban areas. In particular, we request that the development plan prescribes the zoning of a significant proportion of serviced land for lower density residential development in accordance with 6.3 (d) of the guidance. The development industry cannot source finance to build housing that does not fit with actual market needs or demands.

#### 6. An appropriate approach to phased zoning

Ireland is currently experiencing a housing crisis with an estimated 36,000 units required annually to meet demand. Over the last five years an average of 14,110 units have been constructed annually which is significantly below requirements. Estimates based on the range of population growth scenarios from the CSO suggest a requirement of between 460,000 and 760,000 units by 2040.

De-zoning, long term zoning, down zoning and land prioritisation measures including phased release of zoned lands or the application of the sequential test are often motivated by the need to guide development to more appropriate sites closer to the centre of settlements first and to prioritise centrally located sites over those located peripherally. Extreme care should be taken in adopting this approach in the context of catering for short to mid term housing needs. Preferentially promoting unviable brownfield sites while rendering the development of other sites as contingent on unviable brownfield sites has the potential to result in a significant shortfall in housing provision.

A balance is required between promoting brownfield sites and releasing the development potential of outer suburban greenfield sites located within the urban footprint.

## PART 2: LOCAL STRATEGIC SPATIAL ISSUES

### 7. The need to facilitate compact urban growth in the county

It is desirable, probably necessary, that the thrust of the county development plan mirrors the strategic focus of the NPF. If there is not some rebalancing of the growth targets in the current development plan, the plan will be out of line with national policy. We therefore suggest that a greater proportion of the county's population growth target is allocated to Ennis and to the other existing designated towns in the county than is the case under the current development plan<sup>15</sup>.

### 8. The importance of Ennis

The current development plan rightly acknowledges the strategic importance of Ennis and the Ennis 2040 Plan in process is a further acknowledgement of that status. Ennis is the largest, oldest and most developed urban centre in the county. It is also arguably the most sustainable in spatial planning terms, given the close alignment in the scale of its working and residential populations. This minimises the scale of commuting and therefore the social, economic and environmental costs of commuting. This is illustrated by a map of 2016 commuting patterns (see Figure 4), which indicates the very limited impact of Ennis compared with other towns and cities in the region. Red and dark red on the map indicate inward flows of more than 1000 and more than 5000 respectively. Blue indicates areas with outward flows between 1000 and 5000. Ennis barely registers on the map compared with the flow levels within Galway and Limerick, and relatively high levels of inward commuting in Shannon, Ballinasloe, Athlone, Tullamore and Nenagh. This characteristic of the town can also be represented in terms of ratio of jobs to resident works. A ratio of 1 indicates balance and relative sustainability. Ennis has ratio of 0.981, very close to 1, compared with 1.26 for Limerick, 1.3 for Galway, 1.257 for Nenagh 1.591 for Athlone, and 1.44 for Tullamore.

There is therefore a strong social, economic and environmental case for sustaining this character of Ennis. This means facilitating the future growth of both the resident population and employment base of the town and the relevant infrastructure to support that growth.

This means, among other things, ensuring a sufficient allocation of the share of the population target to Ennis. The current development plan allocates 64% of the total target population growth to Ennis which has been allocated to the five largest towns in the county. We suggest that that percentage be increased to 75%.

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<sup>15</sup> Clare County Development Plan 2017 – 2023, Chapter 2

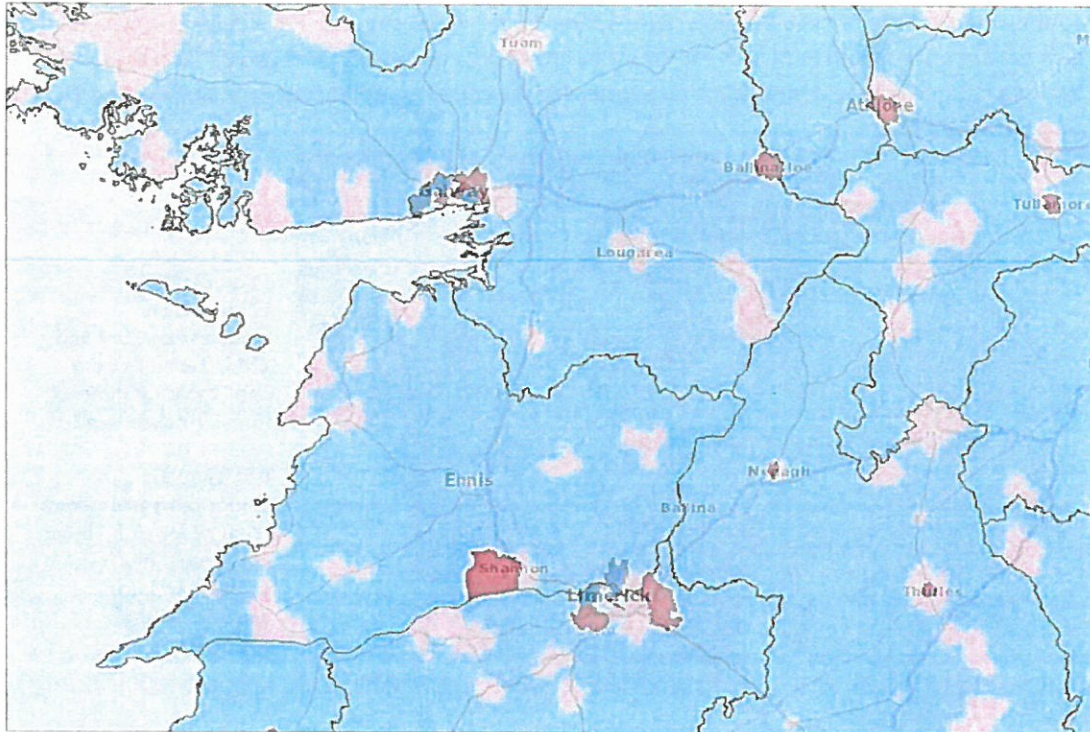


Figure 4 Commuter flows (inward less outward) by electoral division in Clare and neighbouring counties in 2016 (Source: CSO <https://www.cso.ie/en/census/census2016reports/interactivemaps/>)

## 9. The importance of Limerick-Shannon-Ennis as an economic corridor

As well as being an important urban centre in its own right, Ennis is an integral part of an established economic corridor bridging north Limerick and south-east Clare. This is a more extensive area than the designated MASP, but is undoubtedly an established economic area which has grown substantially over the last half century and which should be supported by appropriate policy.

Part of the reality of the corridor is illustrated by 2016 commuter patterns which have been analysed by the Western Development Commission<sup>16</sup>. Figure 5 shows the extent of labour catchments in Clare. A labour catchment consists of enumeration districts within which a specific workplace is the most popular work destination for those working there, i.e. Ennis is the most popular workplace in the Ennis labour catchment and Shannon the most popular workplace in the Shannon labour catchment. Within the Ennis catchment more than half the workers work in the Limerick-Shannon-Ennis corridor. This breaks down to 8305 working in Ennis, 1955 in Limerick City, and 1037 in Shannon. Similarly, within the Shannon catchment more than half of the workers work in the corridor (1541 in Shannon, 586 in Limerick, 301 in Ennis, 127 in Newmarket, 86 in Bunratty and 17 in Sixmilebridge).

<sup>16</sup> Western Development Commission (2018 and 2019) Travel to work and labour catchments in the Western Region

In our opinion the importance of Limerick-Shannon-Ennis as an economic development corridor, of which the Limerick-Shannon MASP and Ennis key town are constituent parts should be recognised in its own right. This would mean specific policies for the corridor in particular in relation to public transport infrastructure.

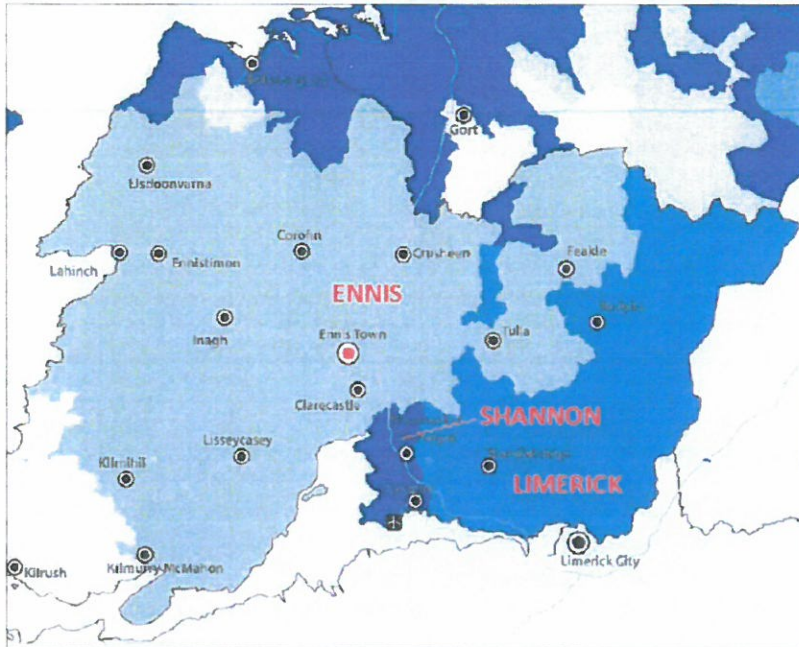


Figure 5  
Labour catchments in  
County Clare  
( Source: Western  
Development  
Commission 2018 and  
2019: Travel to work  
and labour catchments  
in the Western Region)

NB The Limerick  
labour catchment (light  
blue) which is the other  
constituent of the  
corridor was not  
analysed by the  
Commission

## 10. The importance of Shannon as an economic driver but also as a potential drag on development

Throughout the recent past, plans have been drawn up to encourage and facilitate the growth of both Shannon town and its town centre. With its airport and business parks, Shannon is an important part of the economic infrastructure of the Mid West SPA. There has, however, been a recurring pattern of over-estimation of the growth potential of Shannon and of a failure of planning initiatives to produce growth. This has meant substantial areas of zoned and serviced but undeveloped lands over a long period. The 2003 LAP for Shannon expected the town to grow to 9,761 by 2006, a total not yet achieved<sup>17</sup>. The 2012 LAP has a population target of 11,292 in 2017 (but there has been negligible housebuilding in Shannon since 2010). The County Development Plan, 2017-2023, has a target population of 12,931 for Shannon by 2023. This target includes the allocation of 1,000 extra population on account of Shannon's Gateway status under the National Spatial Strategy. The 2020 Metropolitan Area Strategic Plan (MASP) for Limerick-Shannon does not include a population target specifically for Shannon, but it might be expected that the Council will allocate additional growth to Shannon on account of its MASP status.<sup>18</sup>

<sup>17</sup> Clare County Council (2003) South Clare Economic Corridor Local Area Plan

<sup>18</sup> Southern Assembly (2020) Regional Spatial and Economic Strategy

Table 1. Shannon Town Population Growth 1986 – 2016 (source: CSO census of population)

Year	Population
1986	8005
1991	7920
1996	7939
2002	8561
2006	9222
2011	9673
2016	9729



In summary, it is our view that a series of ambitious plans, envisaging a greatly expanded town, have floundered because of stagnant urban growth. We request that the Council give careful attention to this recent history. We suggest that two responses should be given consideration. First, we propose that an enhanced population target (and the requisite land zoning) for Shannon should be dependent on the prior implementation of MASP infrastructure objectives which specifically benefit Shannon. This would mean that not all existing residential and mixed use land in Shannon would be in the first tier of zoning. Second, we propose that Ennis should take precedence over Shannon in the allocation of Tier 1 lands for residential and mixed use development.

#### 11. The need to meet a demand for lower density housing in smaller towns and villages

The 2020 housing report by Ronan Lyons already cited found an even greater difference between housing demand in Dublin and the demand in smaller towns and villages (See Fig 3). In this regard we request that particular attention is given to application of the guidance in Chapter 6 of the 2009 guidelines for sustainable residential development in urban areas. We request that the development plan prescribes the zoning of a significant proportion of serviced land for lower density residential development in accordance with 6.3 (d) of the guidance.

Thank you for the opportunity to comment on the CDP review process and for taking the time to consider this submission.

Yours faithfully

 <b>Conor O'Connell</b> Director, Southern Region Construction Industry Federation	 <b>Brendan McGrath MIPI MRTPI</b> Brendan McGrath and Associates Planning Consultants
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