

Submission No: 130



DIARMUID KEANE + ASSOCIATES LTD

Architecture

Engineering

Surveying

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

15th November 2020

Re: Development Plan Review

To whom it may concern,



I wish to make a number of submissions for consideration as part of the review of the Clare County Development Plan. The below submissions are specifically related to planning and development. As a planning agent, I have keen interest in planning policies in Clare and to this end, I make the below submissions which I hope will be given due consideration as part of the development plan review.

Firstly, I would like to complement the planning department of Clare County Council. The staff of the planning department are extremely helpful and easy to work with. Furthermore, I would like to complement the current Clare County Development Plan 2017-2023 which I feel is a very robust and thorough publication. However, there are a small of potential additions / variations to specific areas of the current plan that in my opinion, would benefit the planning system in Clare, thus improving the planning prospects of native Clare people across the county. Therefore, I wish for the following submissions to be included in the proposed development plan review.

1. County Clare Rural House Design Guide

That the County Clare Rural House Design Guide be updated or rewritten at the earliest possible opportunity. The current guide, which for the record I think is very well written and helpful, is perhaps becoming outdated in the context of contemporary architecture and design. Although the existing guide was only published in 2005, it is fair to say that architecture and vernacular design is evolving year on year. Therefore, I propose that the current guide be at the very least updated to reflect the ever-changing architectural design landscape. Perhaps a commitment can be included in the new CDP to update the County Clare Rural House Design Guide at the earliest possible opportunity of the new CDP.

2. Planning applications relating to one-off housing

That, when planning permission is being granted by Clare County Council for the construction of new one-off dwelling houses or for extensions to existing dwelling houses, a condition be included in the grant of planning permission that the subject development must be painted or fully rendered externally (exterior of subject building) within twelve months of first occupation of said subject building.

Furthermore, that a condition be included in the grant of planning permission that the subject property be landscaped externally within eighteen months of first occupation.

There are too many properties throughout Clare that are left unfinished externally and are providing a negative visual impact on the landscape of the county. There are several houses throughout the county that despite being built in the 1990's or 2000's, still remain unpainted or unfinished to this day. This, in my opinion, is causing a blight on our otherwise beautiful landscape. We put so much thought and effort in to protecting biodiversity and heritage landscapes throughout the county and this is very much reflected in the current CDP. However, it must be remembered that every new house or extension to an existing house that is constructed throughout the county, helps to form part of the landscape of that area. Therefore, the new CDP should contain a specific policy, possibly within the Landscape chapter (currently chapter 13), that gives the Clare County Council planning department powers to implement and enforce planning conditions with regard to the finishes to the exterior of one-off housing.

3. Settlement Strategy and Land Use Zonings

With regard to settlement strategy and land use zonings / designations, that the following be included in the new CDP:

- a) That the areas zoned / designated as 'Rural Areas Under Strong Urban Pressure' in proximity to small towns such as Kilkee and Miltown Malbay, and service towns such as Ennistymon and Kilrush, be adjusted to allow persons who were born or have lived on a permanent basis for a considerable period of time within the small town or service town adjacent to the specific 'rural area under strong urban pressure' be considered as eligible to meet the zoning qualifying criteria, subject to the individual applicant(s) providing sufficient evidence at planning application stage.*
- b) That, on the outskirts of large towns, a buffer zone of approximately 2 kms be incorporated to the land use zonings / designations between the settlement boundary and the 'rural area under strong urban pressure'. This buffer zone would allow persons living on the outer limits of the settlement boundary be open for consideration within the qualifying criteria for 'rural areas under strong urban pressure', subject to the individual applicant(s) providing sufficient evidence at planning application stage.*

The current 'one size fits all' approach with regard to the delineation between settlement boundaries and non-settlement boundaries is unfair and restrictive. For instance, under the current policy, a person who was born and has lived all of their life in the town centre of Ennis and now wishes to build a house on the outskirts of Ennis, would be assessed under the same criteria as a person who was born and has lived all their life on the outskirts of Kilkee but within the settlement boundary and now wishes to build a house just outside the Kilkee settlement boundary. Whilst I acknowledge that towns such as Kilkee, Miltown Malbay, Scarrif / Tuamgraney etc, are rightly considered urban areas, I feel that it is unfair to compare them with towns such as Ennis or Shannon, which is exactly what is happening in the current CDP with regard to the qualifying criteria under the existing CDP 3.11.

Within the settlement boundaries of the majority of large towns, service towns and small towns throughout the county, there are little or no green field sites left available for local persons wishing to build a new home. By adjusting the qualifying criteria of 'rural areas under strong urban pressure' for lands in proximity to small towns and service towns to

include persons from within these towns, the planning system becomes more inclusive and less restrictive for 'local persons' and not just 'local rural persons'.

I would like to thank you for the opportunity to engage in this process and I look forward to viewing the draft Clare County Development Plan 2022-2028.

Please revert should you require and further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Diarmuid Keane". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Diarmuid Keane BSc. (Hons) B. Surv, C.Build E, MCABE, MCIQB.
Diarmuid Keane + Associates Ltd

