

Submission no: 132



LAND PLANNING & DESIGN

**Submission on Clare County Development Plan 2022-2028
Issues Paper**

On behalf of

Trump International Golf Links and Hotel, Doonbeg

CUNNANE STRATTON REYNOLDS
LAND PLANNING & DESIGN

Date: November 2020

*Submission
by
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1.0 Introduction

Cunnane Stratton Reynolds have been appointed by Trump International Golf Links and Hotel, Doonbeg (TIGLH), to make this submission on the Issues Paper in respect of the Clare County Development Plan 2022-2028 which is currently subject to public consultation until 16th November 2020. TIGLH welcome the opportunity to engage in the plan making process and would be happy to discuss the contents of this submission further with Clare County Council.

In accordance with section 11(2) (bc) of the Planning and Development Act 2000 (as amended), this submission focuses on strategic issues affecting the future sustainable development of Clare.

The TIGLH (formerly Doonbeg Golf Club) established in 2002 has become one of Ireland's premier golf and visitor destinations. The owners of the resort have invested heavily in it to create a high-quality tourist facility that attracts visitors from all over the world. The links golf course draws a significant proportion of the visitors to the resort. However, tourists also choose the resort for its location, setting and excellent reputation.

This submission informs the Council of the economic and tourism benefits of the Hotel and Golf Resort to both the County and the Mid-West Region providing some background to its development and outlining the intentions of our client in maintaining and upgrading the facility to enhance its status as a world renowned golfing and tourism destination.

The Issues Paper published is comprised of a series of broad themes that need to be considered when developing the new plan. This submission is primarily focused on tourism development in County Clare. However, tourism cannot be considered independently due to its fundamental links with other infrastructure requirements including transport. An integrated policy approach is necessary, and this submission therefore responds to a number of themes within the Issues Paper.

Our submission focuses on the following specific areas:

1. Tourism development
2. Economy and Economic development
3. Transport and Infrastructure
4. Environment and Climate Change

2.0 Executive Summary

This submission has been prepared against the backdrop of the global COVID-19 pandemic which has left the tourism sector in a precarious position. This sector is however also regarded as an integral economic driver of national economic recovery. The development of tourism within Clare must therefore be a key consideration within the emerging county development plan.

Having regard to the above, the main points of this submission are as follows:

- In addition to protecting existing tourism assets the emerging county development plan must have regard to the need to diversify the tourism product in County Clare to provide tourism offerings that are built on the principles of sustainability.

- It is requested that the emerging county development plan maintain and promote the importance of TIGLH as one of the main tourism assets in County Clare in recognition of its strategic benefits to the region.
- There is significant potential to further promote key settlements in West Clare including Doonbeg from a tourism perspective, building on the existing amenities and events in these areas.
- The emerging county development plan must continue to recognise and support the role of tourism as an economic driver within Clare and the wider region and include specific planning policies and objectives that will stimulate tourism development that will ensure Clare's international competitiveness as an attractive tourist destination.
- A good quality transport network and transport infrastructure are essential to the tourism sector.
- The issue of coastal erosion must be prioritised by Clare County Council to safeguard existing and future developments in high risk areas.
- A balance needs to be struck between the apparent benefits of wind farm developments and other competing development against the potential economic loss to the tourism industry in the West Clare area.

3.0 Planning Policy Context

The national and regional planning policy context has changed significantly since the current Clare County Development Plan was adopted in 2017. The emerging county development plan must be aligned with the policies and objectives of the National Planning Framework and Southern Region Regional Spatial and Economic Strategy.

3.1 The National Planning Framework (NPF) – Project Ireland 2040

The NPF is the Government's high-level strategic plan for shaping the growth and development of the country to 2040. There is a clear focus on more balanced regional growth with 75% of the growth to be targeted outside of Dublin and its suburbs signalling a shift towards Ireland's regions and cities other than Dublin.

Clare forms part of the Southern Region for which the NPF projects that the population will increase by between 340,000 and 380,000 people with an additional 225,000 in employment by 2040.

The NPF is based on 10 no. National Strategic Outcome (NSO's). The following NSO's are of particular relevance in the context of this submission.

NSO 1 Compact Growth

NSO 2 Enhanced Regional Accessibility

NSO 3 Strengthened Rural Economies and Communities

NSO 4 Sustainable Mobility

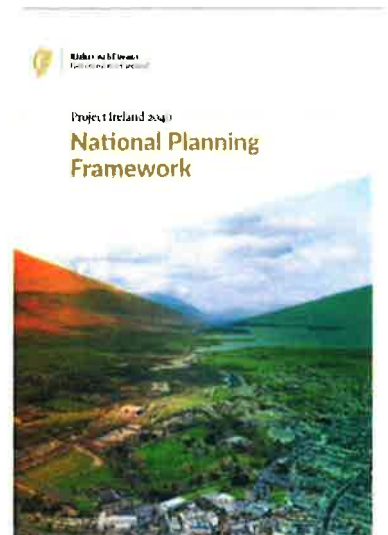
NSO 5 A Strong Economy supported by Enterprise, Innovation and Skills

NSO 6 High Quality International Connectivity

NSO 7 Enhanced Amenity and Heritage

NSO 8 Transition to a Low Carbon and Climate Resilient Society

NSO 9 Sustainable Management of Water, Waste, and other Environmental Resources



The NPF recognises that the Southern Region is supported by a strong rural economy and a variety of towns and villages. It is noted that “future growth in the region will be based on leveraging national and international connectivity, higher education capacity and quality of life to secure strategic investment. This must be underpinned by sustainable employment and housing development, focused on the broader Limerick- Shannon Metropolitan area and a strengthening of the urban cores of the county towns and principal settlements, as well as in rural areas”.

The NPF sets out the key future planning and development and place making policy priorities for this region including:

- *Measures to support the integrated development of remoter parts of this region, particularly rural peninsular areas and towns on its western seaboard, including the ongoing investment in the transport and communications areas, particularly in the roll-out of the national broadband scheme and further promotion and development of attractions to capitalise on underutilised potential in the tourism and local enterprise areas.*
- *Integrated planning, management and development of the areas traversed by the Wild Atlantic Way to maximise both the quality and integrity of the visitor experience and the added benefit in economic terms, especially for rural and local communities.*
- *Developing a more integrated network of greenways, blueways and peatways to support the diversification of rural and regional economies and promote more sustainable forms of travel and activity based recreation.*

The NPF requires that Local Authorities must therefore consider the varied growth potential of different settlement types as well as rural areas and tailor a strategy to balance this accordingly.

Specifically **NPO6** seeks to *“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area”.*

Building on the 2017 Government Action Plan for Rural Development, the NPF places a major focus on strengthening Ireland's rural fabric and supporting the communities that live there by planning for the future growth and development of rural areas with a special focus on activating the potential for the renewal and development of the smaller towns and villages and addressing connectivity gaps.

“Creating the environment to support job creation in rural areas will be a key enabler to rejuvenating rural towns and villages, sustaining vibrant rural communities and reversing population decline”. NPF

The role of Ireland's natural resources is recognised and through the development of the agriculture, food, forestry, tourism and renewable energy sectors, these assets will sustain rural employment and contribute to driving the national economy.

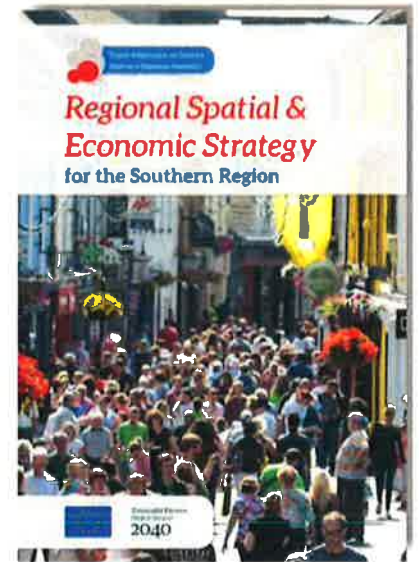
NPO 21 seeks to *“Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability”.*

3.2 The Regional Spatial and Economic Strategy for the Southern Region (RSES)

The RSES identifies the high-level requirements and policies of the Southern Region. It sets out the framework for the Local Authorities and relevant stakeholders to implement the NPF within the context of the RSES.

The Regional policies of the RSES align to the NPF and seek to achieve 10 stated strategic outcomes as follows:

1. Compact growth
2. Enhanced regional accessibility
3. Strengthened rural economies and communities
4. Sustainable mobility
5. A strong economy supported by enterprise, innovation, and skills
6. High quality international connectivity
7. Enhanced culture, amenity, and heritage
8. Transition to a low carbon and climate resilient society
9. Sustainable management of water, waste, and other environmental resources
10. Access to quality childcare, education, and health services



The RSES supports the Department of Rural and Community Development's Action Plan for Rural Development which seeks to increase tourist numbers to rural Ireland, support sustainable jobs through targeted tourism initiatives, develop activity tourism and leverage natural and built heritage assets.

In relation to the development of tourism in the region, RPO53 includes the following objectives:

- *Enhance provision of tourism and leisure amenity to cater for increased population in the Region including recreation, entertainment, cultural, catering, accommodation, transport, and water infrastructure inter alia.*
- *Sustainably develop the road network and public transport services and facilities for improved visitor access, longer dwell times due to improved connectivity to ports and airports and tourism growth.*
- *Sustainably develop walking and cycling trails opening greater accessibility to the marine and countryside environment by sustainable modes and promote the sustainable designation and delivery of Greenway and Blueway Corridors.*
- *Facilitate appropriate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, prioritising sustainable projects that achieve maximum impact and connectivity at national and regional level.*

4.0 Grounds of Submission

4.1 Diversification and Sustainability in Tourism Development

The published Issues Paper asks a number of questions that relate to tourism:

What could be done to protect, support and enhance the tourism sector?

Are there potential tourist attractions including experiential tourism which need further development?

How can the tourist attractions in the County be capitalised on without damaging our rich built and natural landscape?

Tourism is Ireland's largest indigenous sector, employing an estimated 260,000 and generating approximately €9 billion for the Irish economy in 2019. In particular, the sector is of significant regional importance and as one of the leading tourist counties in Ireland, the sustainable development of tourism is critical to the economy of Clare and the wider Mid-West Region. This is reflected in the current Clare County Development Plan which includes as goal VIII "A County Clare in which tourism growth continues to play a major role in the future development of the County, adapting to the challenges of competing markets by maximising the development of a high quality diverse tourism product".

The COVID-19 pandemic has resulted in unprecedented impacts on the Irish tourism sector with a sudden, almost complete, disappearance of visitors. In addition, the tourism and hospitality sector has been further devastated by Government restrictions which have resulted in the closure of businesses and curtailed the movement of people.

While it is a very challenging time for the tourism industry, there is long standing recognition that tourism has an important part to play in economic recovery. Tourism created the largest number of jobs in the period following the last recession and the sector is well positioned to contribute strongly to job creation and reversing unemployment in the future.

Such is the significance of the impact of the pandemic and the role of tourism in economic recovery, a *Tourism Recovery Plan 2020-2023* has been prepared by the Tourism Recovery Taskforce. The emerging County Plan should take adequate account of this important document.

It is essential to emphasise that a key message within the Tourism Recovery Plan recovery plan is that doing 'more of the same' will not be sufficient. Consumer research across core international markets indicates that consumers in a post COVID-19 environment will require a different type of experience. It is noted that additional investment in product development including in outdoor activities and enabling access and better use of vast open spaces will be necessary. It is recommended that a comprehensive review of Irelands tourism product needs to be undertaken to identify strengths, gaps, opportunities, and impediments that will inform future investment in the development of the visitor offering.

Before the pandemic, the expectations of tourists have been evolving in recent years with tourists seeking new types of experiences and Irish Tourism Bodies have been responding through the development of tourism policies and actions plans that seek to group tourism assets around experiences. To unlock tangible growth opportunities, the tourism agencies together have implemented a new consumer segmentation model to inform thinking from a development, industry activation, and

consumer engagement perspective¹. Three priority consumer segments have been developed – *Social Energisers, Culturally Curious and Great Escapers*.

Figure 1 Consumer Segmentation



In Ireland, the most recent policy approach to tourism development has also been underpinned by the need to achieve sustainable growth and this is reflected in the aim of the Growing Tourism to 2025 which states *"In 2025, our aim is that we will have a vibrant, attractive tourism sector that makes a significant contribution to employment across the country, is economically, socially and environmentally sustainable, helps promote a positive image of Ireland overseas, and is a sector that people wish to work in"*.

The Tourism Action Plan 2019-2021 defines sustainable tourism as *"tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities"*.

In seeking to increase investment in the Irish tourist product and drive sustainable tourism, the Tourism Recovery Plan includes the following recommendations:

- *Ireland should have the ambition to be amongst the world-leaders in sustainable tourism practices. The Sustainable Tourism Working Group should develop a suite of actions to promote the sustainable development of tourism by the end of 2020, which should underpin the development of a sustainable tourism policy to be adopted by the Government.*
- *Undertake a comprehensive review of Ireland's tourism product to identify strengths, gaps, opportunities, and impediments to inform future investment in the development of the visitor offering.*
- *Focus Government investment in tourism capital projects on improving product quality and innovation, and the development and enhancement of cultural and heritage experiences to attract a wide range of visitors to Ireland.*

¹ *People, Place and Policy – Growing Tourism to 2025* (Department of Transport, Tourism and Sport)

- *As part of the development of the proposed National Outdoor Recreation Strategy Government should introduce new measures to facilitate access to public and private lands.*
- *Invest in a small number of major international festivals and events which will act as a demand driver for both domestic and overseas tourism.*

In addition to protecting existing tourism assets the emerging county development plan must have regard to the need to diversify the tourism product in County Clare to provide tourism offerings that are built on the principles of sustainability.

TIGLH make the following points in relation to tourism development to be considered in the preparation of the county development plan:

- **The protection and enhancement of the tourism sector should be included as a strategic aim of the Core Strategy in the emerging county development plan to ensure that Clare continues to be a strong tourist destination that capitalises on its reputation to develop the tourism industry of the County in an increasingly competitive tourism market.**
- **The plan must safeguard the role of existing tourist assets in the County into the future. It should include a specific objective that supports the expansion and enhancement of established tourism assets such as TIGLH in recognition of the need for such facilities to evolve and diversify to meet market demands.**
- **Doonbeg Resort is recognised as a development of strategic importance in the current county development plan. This level of support should be maintained in the emerging plan with a specific planning policy objective.**
- **The current plan seeks to integrate the tourism product. There is a need to foster connections and linkages between existing and proposed tourism areas and assets to build on the establishment of tourism experiences where visitors are offered a complete experience that ultimately encourages longer stays.**
- **The plan should include a specific objective that supports the development of new tourist facilities, infrastructure, and experiences in County Clare with an aim of diversifying the tourism offer of the County and extending the holiday season.**
- **The forthcoming plan should establish linkages between the lesser known tourist assets & the more established ones in the County as part of tourist experiences. Examples include The Kilkee cliff walk & The cliffs of Moher walking trail; Lough Derg Blue Way & Kilrush Marina / Shannon Estuary; linking Holy Island and Scattery island.**
- **The Council recognise that there is significant potential to further promote key settlements in West Clare including Doonbeg from a tourism perspective, building on the existing amenities and events in these areas. There is a specific objective in the current plan to “*promote and market the area, building on the cultural amenities and entertainment facilities of Kilrush, Kilkee, and Doonbeg*”. This objective should be maintained and expanded within the emerging plan for Doonbeg to also support existing recreational and leisure amenities and facilitate new tourism development that will leverage Doonbeg’s location as part of the Wild Atlantic Way.**
- **The county development plan will need to place a strong emphasis on sustainable tourism in accordance with Fáilte Ireland’s objective to**

develop a sustainable tourism sector that protects, enhances and promotes both our natural and built heritage for the common benefit of visitor, industry, community and the environment.

- Clare, with its abundance of natural resources and built heritage is well positioned to further develop its sustainable tourism reputation and this should be a main objective of the plan.
- Our client is fully supportive of the proposed Greenway that will link Ennis to Kilkee or Kilrush via Doonbeg. The development of the West Clare Railway Greenway is a long-standing objective of Clare County Council that will have significant beneficial impacts on County Clare. We request that the development of the greenway should be a strategic objective of the emerging county development plan in recognition of the wide-ranging social, economic and health benefits it would have.
- The onset of the COVID-19 pandemic and the associated restrictions on travel, has resulted in outdoor activities and pursuits such as walking, hiking, and cycling have becoming extremely popular. It is submitted that this will lead to increased demand for walking trails, hiking trails and cycle trails/greenways in the future and the council must take this into consideration in the plan preparation.
- Our client requests continued support for festivals and the advancement of this consideration in the emerging county development plan. There are a number of existing festivals that take place throughout the year in County Clare including the West Clare Drama festival, the Doonbeg jazz festival, Doonbeg regatta, One Act Drama festival and Doonbeg Christmas market. The emerging county development plan should recognise and maintain support for these and review the scope for additional festivals and events to increase the profile of the County.
- The plan should support the development of a music trail within the County that highlights famous musicians of the past and traditional instruments such as Willie Clancy (Miltown), Willie Keane (Doonbeg), Micko Russell (Doolin). It is noted that there are existing commemorative events. However, there is an opportunity to further development this into a music festival celebrating various famous Clare musicians.
- Clare County Council should work with stakeholders including the OPW, the Heritage Council, the Arts Council, local communities and businesses to support the development of heritage and cultural tourism in County Clare which would also support the greenway for example Doonbeg Castle.
- The emerging development plan should maintain support for food tourism in the region. Clare County Council should work with the relevant stakeholders to facilitate growth in the food tourism sector. Our client believes that there are significant opportunities to develop tourist food trails that would also support economic development. Examples include a food trail from Loop Head to New Quay e.g. Oysters from Carraigaholt, harvesting of seaweed / sea grass in Quilty; foraging in Lahinch; Chapel Gate Whiskey; Linalla Ice Cream in New Quay; Clare jam in Doolin, Moher cottage fudge; fishing in Doonbeg & Liscannor bay. The plan should support and promote existing and potential future food related festivals including Doonbeg Seafood festival and Carraigaholt Oyster festival.

- Potential heritage trail developments include a trail around the of the wells of Doonbeg and the greater Clare area and a trail highlighting the Spanish Armada & its connection with west Clare.
- The emerging development plan should also maintain support for the promotion of a variety of sporting events that would appeal to a wide range of tourists. Clare is known internationally as a golf and surfing location. The development plan should seek to capitalise on this as Clare has a good track record in hosting large sports events. The Irish Open held in Clare in 2019 was a huge success. Clare was the natural resources and infrastructure to host such events. Potential future events that the Council should facilitate and support include Iron Man and Triathlon events.
- The existing development plan notes the opportunities of developing the conference and event market as an area of particular focus for tourism in County Clare in the coming years. It is considered that the presence of an international Airport and access to the national motorway puts Clare in an ideal position to capitalise on this growing market. The forthcoming plan should continue to support and encourage the marketing of County Clare as a conference location at national and international level.

4.2 Economy and Economic Development

Doonbeg Golf Resort opened in 2002 and is one of the largest direct employers in the West Clare region. In 2006 *Shannon Development* stated that Doonbeg Golf Resort is;

“The single largest tourism project ever to have been undertaken in the west of Ireland. The Doonbeg project is the equivalent of getting a major international industry such as Intel or Dell to set up in West Clare. It represents an investment of €150 million in the area, which will generate the same again in additional indirect tourism investment, giving an estimated total tourism investment of up to €300 million along the West Clare coast and surrounding area”².

The population of the area has increased significantly since the opening of the Doonbeg Golf Resort and this is reflected in the population figures from the time. The population of the Doonbeg Electoral Division within which the golf resort is located increased by 17.6% between 2002 and 2006; and by 7.6% between 2006 and 2011. This is significantly above the County, Regional and National population changes during that period as indicated below. The hotel employs 270 full and part-time staff in peak season, and this does not take into account indirect employment associated with the hotel and resort including tour operators and food suppliers. Around 90% of the workforce live within a 35km radius. This employment helps to sustain the local population by providing career opportunities for young people.

Table 1 Census of Population Comparison

Census Period	Doonbeg DED	Co. Clare	Munster	Ireland
2002-2006	17.6%	7.4%	6.6%	8.2%
2006-2011	7.6%	5.6%	6.2%	8.2%
2011-2016	0.5%	1.3%	2.7%	3.7%

² <http://www.shannondevelopment.ie/News/NewsReleases2006>

The hotel and resort act's as both a tourism hub and a stimulus for other services and facilities in the area.

Golf tourism is an extremely lucrative and growing sector of Irish tourism and golfers are among the highest revenue generating visitors to Ireland. Fáilte Ireland has recorded that over 200,000 overseas visitors take part in golf during their visit to Ireland every year, contributing almost €270 million to the economy and driving over 1.7 million bed nights across the country. With Tourism Ireland, Fáilte Ireland is focused on growing these numbers by targeting those markets with greatest potential. One fifth of overseas golf visitors to Ireland play golf in the Shannon Region. The Clare links golf product offering, and nearby air transport infrastructure strongly position the county as an accessible quality destination supported by the marketing of the region through the Wild Atlantic Way brand strategy. Doonbeg Golf Resort is the only links course on the Wild Atlantic Way with hotel accommodation. The quality and international reputation of neighbouring Lahinch Golf Club combined with Doonbeg provides visitors to the county with a strong rationale to extend their stays in the area and the basis for the wider destination marketing approaches.

Tourism sustains much of the economy in West Clare and this is especially the case for Doonbeg. The economic benefits of the hotel are evident in Doonbeg and West Clare due to the spending of guests.

Hotel guests are encouraged to experience local facilities, including pubs, restaurants, and shops. Trips to Lahinch, Ennis and other destinations are arranged for guests to sight-see or shop at destinations such as the Kenny's Bar in Lahinch, the Burren Perfumery, the Burren Smokehouse and Hazel Mountain Chocolate to name but a few. The hotel runs a bus into the village (every 30 minutes from 6pm) where the turnover of several pubs and restaurants has a high dependence on the expenditure of people staying at the hotel. Outdoor activities are also encouraged, including horse-riding, clay pigeon shooting, archery, surfing, paddle boarding and kite or wind surfing, and are managed through independent specialist operators. These activities are supported by the hotel.

In 2019, TIGLH secured planning permission for a significant planned investment that includes the construction of a ballroom/ function room building; leisure facility including swimming pool; a restaurant and 53 no. dwellings for short term tourist accommodation.

The proposed new accommodation and development will further widen the hotel's appeal to non-golfing guests, including out-of-season visitors and weddings (including overseas weddings).

The sustainable and successful development of the tourism sector is essential to the economy of Clare and the wider region and can perform a role in economic recovery within the region. The Council has a key role in protecting existing tourism assets and continuing to grow the sector within County Clare to maximise the development of a high-quality tourism product.

As noted above, tourism has an integral role in economic recovery, and this was apparent during the last recession. The emerging county development plan must continue to recognise and support the role of tourism as an economic driver within Clare and the wider region and include specific planning policies and objectives that will stimulate tourism development that will ensure Clare's international competitiveness as an attractive tourist destination.

The emerging plan must also consider the impacts of the COVID 19 pandemic on how people work. There are many thousands of people working remotely as a result of the pandemic. This is going to irreversibly change how and where people work. The way in which workplaces have adapted to home working has demonstrated that generally a fulltime presence in the office is not necessary. Many people have left the larger cities and returned home to towns, villages, and rural areas around the country. Some people have used remote working as an opportunity to move to rural parts of the country for a cleaner, greener quality of life with easy access to recreation and amenities.

In the long term, we submit that remote working will have positive impacts regionally. Rural areas of the country will have an increased year round population to sustain local services and create increased opportunities for new businesses, services, and facilities. Clare County Council must be commended for their response to the new ways of working. In an effort to make Clare the remote working capital of Ireland, the Council have set a goal of opening an additional six digital hubs by the end of year.

The availability of excellent high-speed internet connectivity and improved road and public transport link (discussed in Section 4.3) are essential to the long-term successful operation of remote working in County Clare. It is imperative that the infrastructure is put in place and that this is reflected in the emerging County Plan.

The way in which people work was already changing prior to the pandemic. The current county development plan (objective CDP6.12) sought *“to support the development of a network of digital hubs in order to attract new business to locate in County Clare and to support the further growth and development of the digital and media industries in the County”*.

The emerging county development plan will have to consider what policies and objectives need to be implemented to cater for a significant amount of remote working. The emerging plan should include policies and objectives to support and develop the rural economy to enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries.

It is submitted that digital strategies are critical for the towns and rural areas in promoting and guiding new economic opportunities where peripheral locations can interact more successfully with larger urban centres and the metropolitan area.

The increased population in rural areas of Clare will also need to be carefully considered in the context of the emerging Core Strategy and land use zoning requirements within the settlements over the period of the county development plan.

4.3 Connectivity and Transport

A good quality transport network and transport infrastructure are essential to the tourism sector.

Shannon Airport

A competitive, well-resourced, and well-functioning Shannon Airport is a main principle of the vision for the Limerick Shannon Metropolitan Area Strategic Plan (MASP).

The MASP recognises the role of Shannon airport as a national and international driver of economic, social and tourism growth. It is a specific objective of the MASP to develop and enhance the strategic role of the airport and to advocate for a policy environment that supports a regional distribution of air traffic and for a greater regional focus by national agencies. The MASP notes that it is imperative that the connections from Shannon Airport are maintained and improved. Clare County Council must work with the relevant stakeholders to ensure year-round connectivity to transatlantic and European hubs and the introduction of new destinations as this will be vital to support both business and tourism within Clare and the wider region.

Enhancing connectivity from Shannon International Airport to drive economic development along the entire west coast of Ireland, the Region and the Midlands is a priority for the Limerick Shannon MASP.

The upgrade of the N19 Airport access road and the development of a high-quality public transport network that serves the airport and improved regional connections is essential to enhancing the airports level of connectivity.

Placemaking in Doonbeg Village

The current county development plan supports improved facilities for pedestrians in Doonbeg such as footpath linkages between key areas of the village to encourage safe and efficient pedestrian movement and improve amenities in the areas. This must be maintained in the emerging plan with a focus on high quality placemaking within the village in accordance with national and regional planning policy objectives.

Key principles of the RSES are the need to invest and deliver infrastructure to improve the liveability and quality of life of urban and rural areas and the need to use quality urban design to enhance the character of a place and to ensure development is respectful of the existing physical, social, environmental and cultural context.

COVID-19 has highlighted and increased the need and demand for good quality walking and cycling routes and access to attractive public spaces in all areas and research by Failte Ireland suggests that tourists too are looking for more meaningful activity based experience when visiting Ireland.

The Council should prioritise the enhancement of the public realm within Doonbeg Village to improve the quality of life of residents and the visitor experience.

Improvements that are required include:

- Enhancement of the entrances to the village;
- Access to and improvement of the designated amenity area to the east bank of the Doonbeg River (currently zoned OS1). This would form a good connection with the amenity space on the opposite side of the road;
- There are significant gaps in the footpath network and poor quality paths that need to be upgraded;

- Planting and benches at appropriate locations that would extend peoples dwell time in the village;
- Removal of the overhead cabling and the installation of high-quality public lighting such as lamps;
- Improved signage for tourist amenities and attraction sin the area e.g. the Doonbeg Loop.

Figure 2 Extract of Existing Doonbeg Zoning Map

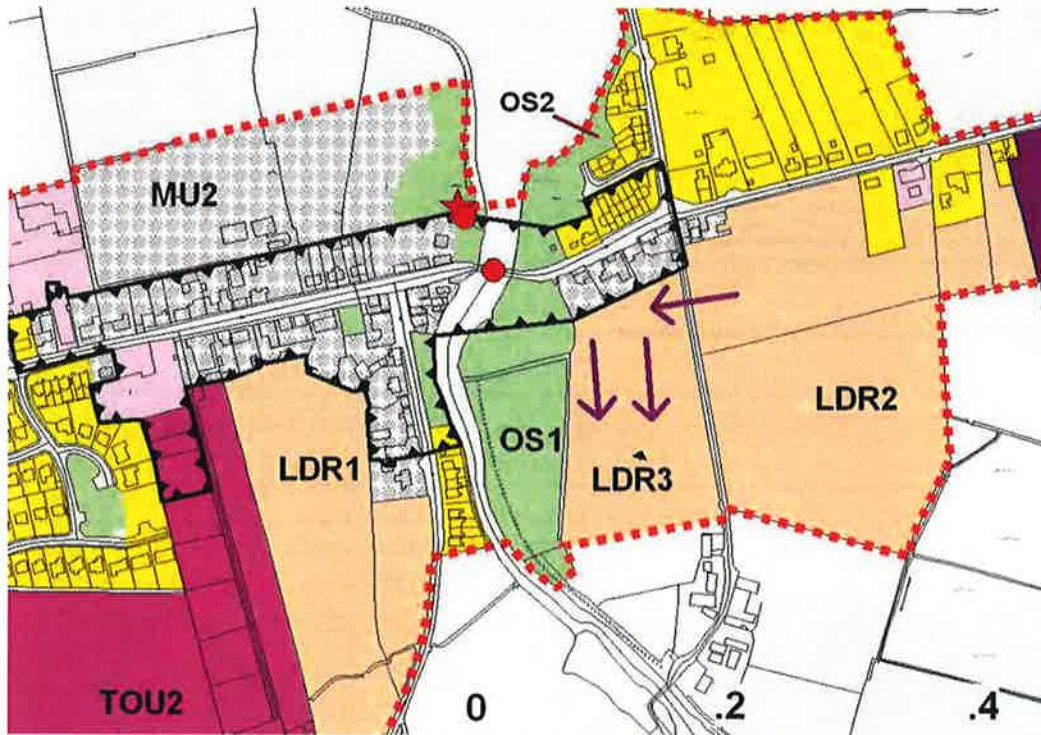
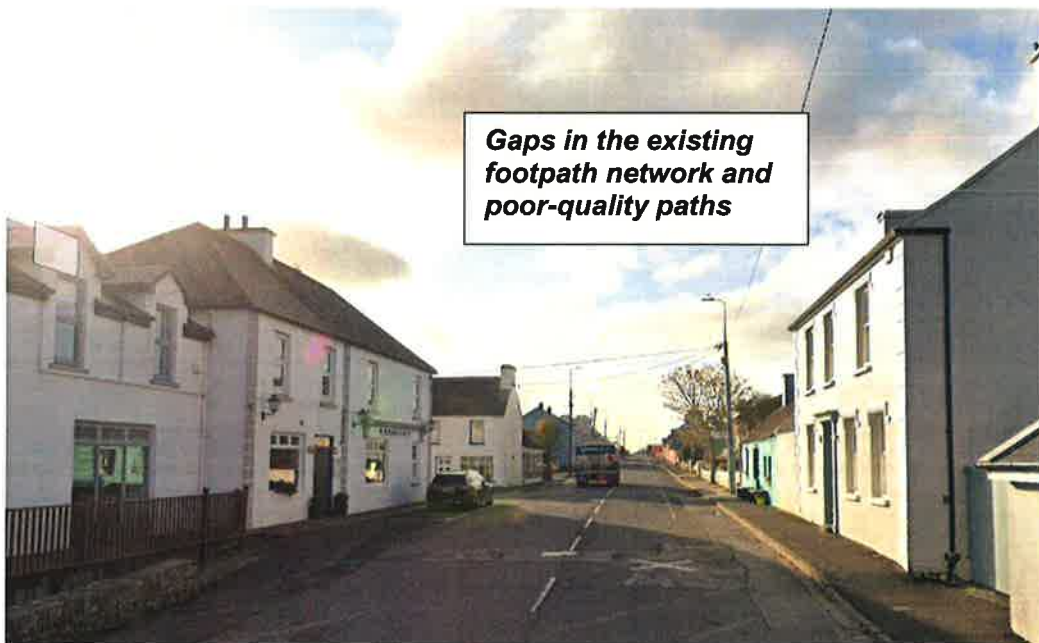


Figure 3 Access to and upgrade of OS1 lands required



Figure 4 Centre of Doonbeg Village



Roads Infrastructure

Enhanced regional connectivity is a key objective of the Regional Spatial and Economic Strategy (RSES) for the Southern Region. The RSES further highlights that investment in the quality of the road network along tourism corridors is important to ensure that visitors, both domestic and international, are assured a safe and good standard of connectivity, helping to generate economic activity across our urban and rural tourism locations. Regional Policy 173 relates:

"It is an objective to invest in the sustainable development of infrastructure and service improvements on the transport networks along our region's key tourism corridors, subject to robust feasibility studies to reduce impacts on the environment and required appraisal, planning and environmental assessment processes, including the Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartland Corridors".

Our client submits that the regional roads within Clare need to be upgraded to accommodate tourism traffic. The N67 from Ennis to Kilkee, Doonbeg, Lahinch, and Cliffs of Moher should be upgraded as a matter of priority with improved surfaces and signage to create a safe visitor route that matches the quality of the destinations themselves.

Public Transport

Doonbeg is currently served once daily Monday to Saturday by bus route no. 333 that serves Ennis-Doonbeg-Kilrush. The bus services Doonbeg at 7.45 am on route to Ennis and 5pm on return from Ennis. The infrequency of the existing bus services is resulting in an over dependence on private transport amongst both residents and tourist to Doonbeg.

Increasing the use of public transport and increased walking and cycling underpins sustainable tourism. It is requested that Clare County Council in collaboration with the NTA prioritise the delivery of a high quality, frequent and reliable bus service to service Doonbeg. This we submit is in accordance with Regional Policy Objective 172 which states

"It is an objective to expand the development and expansion of the Local Link Rural Transport Programme by the NTA in the following manner:

- *Seek further integration with other public transport services, including HSE and school;*
- *Better linkage of services between towns, villages, and rural areas.*
- *Ensure fully accessible vehicles operate on all services;*
- *Enhance the customer experience;*
- *Increase patronage among children and young people; and*
- *Encourage innovation in the service".*

4.4 Utilities Infrastructure

Water Supply Infrastructure

The economic development of towns and villages is directly connected to investment in infrastructure such as water supply. Water outages in Doonbeg and surrounding areas result in significantly disruptive impacts. Clare County Council should as a matter of prioritise highlight the need for these upgrades.

4.5 Environmental Considerations and Climate Change

Coastal Protection

The settlements along the coast of West Clare are particularly exposed to the impacts of climate change including an increased frequency of extreme weather events that is resulting in significant flooding and coastal erosion. The development at Doonbeg is one such area that is at particularly high risk and a number of weather events over the last number of years have resulted in significant flooding and ultimately economic losses to the resort as a result of course closures.

The current Clare County Development Plan recognises the importance of coastal protection. It notes that County Clare is particularly susceptible to the impacts of these coastal changes and predicted rises in sea levels will compound these issues in the future. It is increasingly important therefore to actively manage the coastal environment and the risks associated with these anticipated changes.

Policy objective CDP12.12 relates, which states that it is an objective of Clare County Council:

- *To engage with the OPW to develop appropriate strategies for the management of identified coastal flood and erosion hazards and associated risks;*
- *To seek funding for coastal defence works based on the outcome of detailed Coastal Erosion and Flood Risk Management Studies undertaken in areas identified as being at risk from coastal flooding.*

The National Planning Framework notes the importance of Ireland's coastal areas as a key driver for the tourism sector. It is stated that the coast is a fragile resource that needs to be managed carefully to sustain its character and attributes in physical environmental quality and biodiversity terms. The NPF notes that as result of climate change, sea levels and patterns of accretion and erosion are key issues for planning and flood risk assessment, especially in managing the ongoing development of our cities and towns.

The following national policy applies to coastal management:

NPO 41a – Ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality.

NPO41b –In line with the collective aims of national policy regarding climate adaptation, to address the effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.

The importance of coastal protection is also highlighted in the RSES. Regional Policy Objective 120 states that

“It is an objective to support measures (including Integrated Coastal Zone Management) for the management and protection of coastal resources and communities against coastal erosion, flooding, and other threats. Statutory land use plans shall take account of the risk of coastal erosion”.

Since the current development plan was published, Clare County Council Climate Change Adaptation Strategy 2019-2024 has been adopted in 2019. This document outlines the proposed Adaptation Strategy that Clare County Council will implement to adapt to the effects of climate change and to safeguard the biophysical infrastructure and wellbeing of the people and communities of County Clare. It is noted that the strategy will be standalone document, but its goals and objectives will be incorporated into all future plans and policies of Clare County Council to ensure climate adaptation is at the forefront of our service delivery. **The emerging County Plan must take full account of this important document.**

The Strategy outlines how Clare County Council will address its climate adaptation responsibilities through a schedule of objectives and actions. The actions and objectives were developed from local authority directorates workshop, guidance documents and research conducted on a national level.

G4 Drainage and Flood Management Objective 4 seeks to *undertake measures to reduce coastal flooding and to proactively react to incidences of coastal flooding in County Clare.* This objective requires the following action:

(a) Engage with the Office of Public Works to develop appropriate strategies for the management of identified coastal flood and erosion hazards and associated risks.

(b) Seek funding for defence works based on the outcome of detailed Coastal Erosion and Flood Risk Management Studies undertaken in areas identified as being at risk.

Figure 5 Extract from Clare County Council Climate Change Adaptation Strategy

G4 DRAINAGE AND FLOOD MANAGEMENT			
OBJECTIVE 4: To undertake measures to reduce coastal flooding and to proactively react to incidences of coastal flooding in County Clare.			
No	Action	Lead	Timeframe S/M/L
1.	(a) Engage with the Office of Public Works to develop appropriate strategies for the management of identified coastal flood and erosion hazards and associated risks. (b) Seek funding for defence works based on the outcome of detailed Coastal Erosion and Flood Risk Management Studies undertaken in areas identified as being at risk.	Physical Development	Short 1- 2 years Medium 2-5 years Long > 5 years

As noted the emerging plan must have full regard to the adopted Climate Adaptation Strategy and include policies and objectives within the emerging County

Development Plan that prioritise the issue of coastal erosion in Clare to safeguard existing and future developments in high risk areas.

Delays in the delivery of coastal protection works in Clare are going to result in impacts on economic and tourism development within the region. For example, the permitted significant expansion of TIGLH will not occur until the significant risks associated with coastal erosion are addressed.

Wind Farm Developments

Our client acknowledges the benefits of wind farm development. However, it is submitted that the area around Doonbeg is at capacity and beyond in terms of wind farm development and given the importance of the tourism industry to the area it must be a priority to protect the existing and proposed important tourism assets of the area which are founded on the largely unspoilt character with expansive uninterrupted views.

Tourism in the West of County Clare is bolstered by its coastal environment, attractive scenic landscapes, vibrant towns and villages and recreational amenities. In particular, beaches and golf courses attract significant tourism to this area. Research by Fáilte Ireland confirms that within coastal environments, visitor's response to windfarm development is significantly negative as these landscapes are perceived as being the most sensitive. Our client has serious concerns that the incremental increase in wind farms in this area is resulting in cumulative negative visual impacts and detracting from the tourism assets and Wild Atlantic Way route.

The Clare Wind Energy Strategy will have to be revised in accordance with the soon to be published National Wind Energy Development Guidelines. The Draft Wind Energy Guidelines 2019 recommended that

“The effect of wind energy development on tourism and recreational activities must also be assessed by the local authority in the preparation of their landscape character assessment. In this regard, it is desirable that the relevant national and/or regional tourist authority should be consulted. In many areas in Ireland, tourism and recreation underpin the local economy and can depend to varying degrees on the quality of the environment. Wind energy developments are not incompatible with tourism and leisure interests, but care needs to be taken to ensure that insensitively sited wind energy developments do not impact negatively on tourism potential”.

We submit that a balance must be struck between the apparent benefits of wind farm developments and other competing development against the potential economic loss to the tourism industry in the area.

Wave Energy Opportunities

The Clare Renewable Energy Strategy recognises that County Clare is ideally placed for the delivery of pre-commercial wave energy projects, with a number already active off the Clare coast. The County has several advantages for wave energy including an excellent wave resource, strong grid connection and proximity to existing maritime infrastructure located on the Shannon Estuary. This Strategy seeks to ensure that the advantages County Clare has with excellent infrastructure such as ports and electricity grid together with the Shannon Estuary are maximised.

The following current objectives apply to wave energy:

It is an objective of Clare County Council:

- a. *To facilitate the attainment of 20MW from wave energy by 2020 in line with national policy, proper planning and sustainable development;*
- b. *To facilitate the attainment of 20MW from tidal energy by 2020 in line with national policy, proper planning and sustainable development;*

Our client is supportive of the development of wave energy projects off the coast of Clare and submits that Clare County Council should continue to facilitate and support such development through planning policy objectives in the forthcoming development plan.

5.0 Conclusion

On behalf of our client TIGLH, we request that the contents of this submission are given careful consideration in the preparation of the Clare County Development Plan 2022-2028. Our client looks forward to the publication of the Draft Plan and would be happy to discuss the contents of this submission further with the Local Authority.

We ask that we are included on any mailing list that is created to provide updates on the plan making process (info@csrlandplan.ie).

