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**To:** [Development Plan](#)  
**Subject:** Submission to Variation No.1 to the Clare County Development Plan 2023-2029  
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**Attachments:** [REDACTED]

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Dear Sir, Madam,

On behalf of our clients, Mary de Courcy and Owen O'Meara, please find attached submission including map and schematic site layout plan at appendices 1 and 2 in regard to Variation No. 1 to the Clare County Development Plan 2023-2029. This is being submitted in regard to their land at Knockballynameath, Athlunkard, County Clare.

I would be grateful if you could confirm receipt of this submission please?

Thank you.

Kind regards,  
Michelle

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# Submission on Proposed Variation No. 1 to the Clare County Development Plan 2023-2029

For Lands at Knockballynameath, Athlunkard, County Clare  
on behalf of Mary de Courcy & Owen O'Meara

April 2026



# Document Control Sheet

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# 1. Introduction

This submission has been prepared by McCutcheon Halley Planning Consultants on behalf of Mary de Courcy and Owen O'Meara in response to public notices inviting submissions from interested parties on Proposed Variation No. 1 to the Clare County Development Plan 2023-2029.

Our client welcomes the publication of the Variation and the opportunity to participate in the plan making process which will inform the future development of County Clare and align with the NPF Implementation: Housing Growth Requirement' Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act 2000, as amended (2025).

In summary, this submission requests the following provisions as part of the proposed variation to the Development Plan in respect of the subject lands at Knockballynameath, Athlunkard, County Clare:

- **Zone the subject lands for 'Residential'; and**
- **Amend the settlement boundary to include the subject lands.**

This submission demonstrates that the **subject lands are suitable for residential development** for the following reasons:

- **It is a fully serviced site and there is capacity within the water and wastewater network.**
- **It will contribute to sustainable, compact and sequential growth.**
- **Located in an area with good public transport and will benefit from planned future Bus Connects Works.**
- **Athlunkard is located within a short commuting distance of a strong employment base and services within Limerick city.**
- **The site is located within c. 200 metres of local commercial services.**
- **The site provides alternative options for managing access and flow of traffic.**
- **There is a market demand for housing in the area from both locals and commuters to Limerick City as acknowledged in Volume 3b of the Clare County Development Plan on the settlement of Athlunkard.**

It is therefore submitted as part of this submission that these lands are **demonstrably deliverable in the short-term** and we would ask the Council to zone for residential use as part of the need to zone additional residential lands in support of accelerated housing delivery. The structure of this report is as follows:

- Section 1 Introduction
- Section 2 Site Context
- Section 3 Planning History
- Section 4 Planning Policy Context
- Section 5 Rational for Submission Request

- Section 6 Conclusion

A high-level schematic site layout plan accompanies this report and is appended at Appendix 1. This layout has been submitted to demonstrate how residential can be delivered on the site and how it has regard to the key urban design principles and planning considerations as per the Clare County Development Plan.

## 2. Site Context

The subject site comprises of 3.01 hectares and is a greenfield site located to the west of the R463 Corbally Regional Road, within the townland of Knockballynameath, Athlunkard, Co. Clare. It is bounded to the north by the Clonard Road and a two-storey dwelling with outbuildings and mature boundary planting. It adjoins the settlement boundary to the immediate east along the Corbally Road and is located just north of the built-up residential area to the south, with lands to the south-east zoned for residential and having been granted planning permission for 101 houses in May 2025. Beyond that are the existing residential estates of Shannon Banks to the south and Westbury to the south-east. The full extent of the site is bounded by an existing footpath.

The site also benefits from proximity to a mix of commercial uses within the Corbally Shopping Centre approximately 200 metres to the south including supermarkets, eateries, shops and crèche as well as filling stations to the south and east.

Athlunkard is situated in the Limerick City suburbs and forms part of the Limerick-Shannon Metropolitan Area. It is therefore within close proximity to Limerick City and is suburban in character and form.



Figure 1 Site Context (Source: Google Maps)

## 3. Planning History

### 3.1 Subject Site

A desktop search of Clare County Council's planning register indicates there is no history of planning applications for the site.

### 3.2 Surrounding Sites

It is important to note that planning permission (25/60108) was granted for 101 houses in May 2025 for land to the south-west.

The layout included for a future vehicular connection to our client's site in the north-eastern corner of the permitted development. In the Council's assessment, they concluded that:

*"Having regard to the residential land use zoning on this site, the design of the proposed development and the details and particulars as submitted, the development as proposed is considered acceptable and in keeping with the proper planning and development of the area."*

The main reason for granting permission was as follows:

*"Having regard to the 'Residential' zoning of the site, the policies and objectives of the Clare County Development Plan 2023-2029, the nature, scale and design of the development, the provisions of the Ministerial Guidelines, 'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities', Department of Housing, Local Government and Heritage, 2024, and the pattern of development in the area, it is considered that, subject to conditions, the proposed development would not seriously injure the amenities of the area or of property in the vicinity, would be acceptable in terms of traffic and pedestrian safety and convenience, and would be in accordance with the proper planning and sustainable development of the area."*

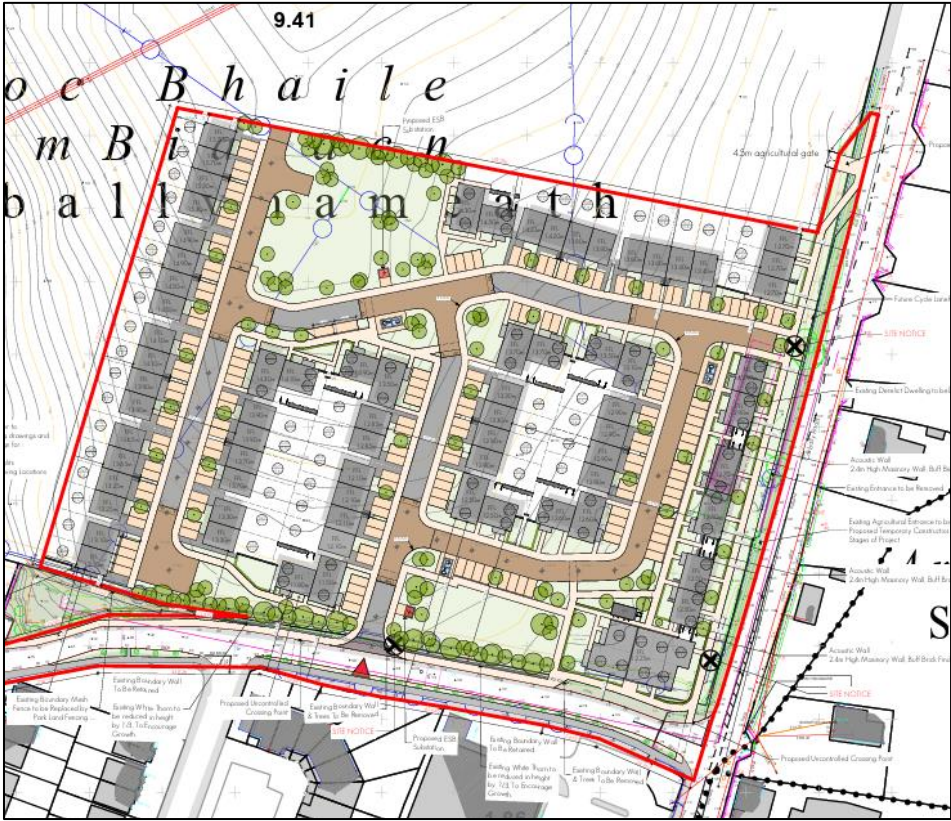


Figure 2 Permitted Site Layout under Planning Ref. 25/60108 for land to south of subject site (Source: Clare County Council Planning Register)

## 4. Planning Policy Context

### 4.1 National Policy Context

#### 4.1.2 Revised National Planning Framework

On April 8th, 2025, the Government approved the Revised National Planning Framework (RNPF). 2025.

Since the publication of the NPF in 2018, a number of changes have occurred in Ireland, which the revised framework addresses.

The key drivers of change in the revised NPF include the following:

<p><b>Population growth and the associated housing requirement:</b></p>	<p>The need to plan for a population of between 6.1 to 6.3 million people people<sup>1</sup> by 2040, and plan for approximately <b>50,000 units per annum</b> over that period, to meet additional population and employment growth over and above the original 2018 NPF projections.</p> <p>The Revised NPF, with the subsequent provision of updated planned housing requirements at a local authority level, aims to ensure that <b>housing supply meets both new demand and addresses existing need</b>, creating a sustainable future for housing in Ireland.</p>
<p><b>Infrastructure Delivery</b></p>	<p>In order to ensure that the revised population projections and related housing requirements can be delivered on, service provision will also require co-ordination and prioritisation to ensure that the necessary infrastructure is in place, both to support and enable housing development to take place, and to <b>ensure that housing delivery is aligned with the provision of services and facilities for communities</b>. This includes the provision of education, childcare, healthcare and recreational facilities to support the expansion of existing settlements and the creation of new sustainable communities.</p>

The Revised NPF sets new housing targets and updated population projections following recent demographic trends. The population targets within the document correlate closely with those of the original NPF. National Policy Objective 4 targets *“half (50%) of future population and employment*

<sup>1</sup> In addition to accounting for the ESRI's baseline projection of 6.1m people by 2040, the NPF also includes provision for strategic planning for up to 6.3 million people by 2040 (the ESRI high migration scenario).

*growth will be focused in the existing five cities and their suburbs". However, National Policy Objective 42 projects a requirement "to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040". This national housing target of **50,000 homes per annum** set by the revised NPF is substantially larger than the 33,000 homes per annum set in the original NPF.*

The revised NPF also requires an uplift of 50% in housing output and need for additional **zoned land for residential development** across Clare, but especially in the main metropolitan suburbs such as **Athlunkard**.

This uplift in the housing target is due to a lack of housing supply since the NPF was initially published. Additionally, the uplift underlines the need to deliver more homes at scale, especially within established urban areas. This uplifted national housing target necessitates that planning authorities review their development plans as soon as possible. To this end, the Minister of Housing, Local Government and Heritage has instructed local authorities as follows: *"It will be necessary for your teams to consider at pace the most suitable locations and opportunities for new housing development in your administrative areas, taking into account where delivery is most likely to occur and where infrastructure and services are available, or may be readily available."*

The RNPF further states that **"city and county development plans will need to relate these targets to the quantum and location of future land use zoning"**

The NPF outlines a methodology to be put in place for core strategies within Development Plans which will address issues between zoned lands which are available for development and zoned lands that require significant further investment in services for infrastructure for development to be released. In accordance with the NPF, National Policy Objective 101 states the following:

*"Planning Authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned lands that are **serviced** and ii) **zoned land that is serviceable within the life of this plan"***

In order to match the revised NPF housing target, the 2023 Clare County Development Plan must be reviewed and updated to align with the Revised Framework and identify lands that are the most suitable locations and opportunities for new housing development, where infrastructure and services are available, or may be readily provided in locations where *"housing delivery is in **high demand**"* – Athlunkard is within the metropolitan area of Limerick and as acknowledged by Volume 3b of the Development Plan, its proximity to Limerick City provides the settlement with a significant advantage for employment opportunities within short commuting distance as well as demand for residential demand in Athlunkard coming from both locals and Limerick commuters.

### 4.1.3 Guidelines on National Planning Framework Implementation – Housing Growth Requirements 2025

Further to approval of the Revised NPF in April 2025, which sets out a need to plan for the delivery of approximately 50,000 additional housing units per annum to 2040, Guidelines on the National Planning Framework Implementation – Housing Growth Requirements 2025 were published to facilitate the review and variation of city and county development plans.

The Guidelines set out the housing demand scenario to 2040 for each local authority, based on ESRI modelling of population growth and structural housing demand and assumptions relating to unmet demand. Local Authorities can now begin the process of assessing their existing development plans in order to reflect the revised figures in their development plans.

Policy and Objective 1 of the Guidelines state that:

*“It is a policy and objective of these Guidelines that the **housing growth requirements for each planning authority set out in Appendix 1 are reflected in the relevant City or County Development Plan**, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.”*

Appendix 1 of the Guidelines provide new annual housing growth requirement figures for each Local Authority, which are provided in the form of an annualized estimated housing figure for two time periods (2025 to 2034 and 2034 to 2040). The new housing growth requirement for Clare County Council is outlined below:

Table 1: Extract from Appendix 1 of the 2025 Guidelines on National Planning Framework Implementation

			2025 to 2034	2035 to 2040
Local Authority	Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual New Housing Growth Requirement to 2034	New Annual New Housing Growth Requirement 2035 to 2040
Carlow County Council	406	518	518	507
<del>Cavan County Council</del>	<del>479</del>	<del>666</del>	<del>666</del>	<del>509</del>
Clare County Council	550	960	985	687
<del>County Council</del>	<del>2,092</del>	<del>2,706</del>	<del>2,706</del>	<del>2,539</del>
Cork County Council	2,437	3,769	3,837	3,045
Donegal County Council	965	1,280	1,283	1,206

While the Guidelines do not significantly increase the housing growth requirement for the County, the Guidelines state that planning authorities should address the scope for additional provision of up to 50% in excess of

the baseline housing growth requirement, in light of the urgent need to increase housing delivery and to optimise the ability to deliver on the housing requirements of the Revised NPF. The Guidelines state that *“additional provision recognises the fact that, for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan.”*

Policy and Objective 2 of the Guidelines state that:

*“It is a policy and objective of these Guidelines that **‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan**, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.”*

As previously noted, the Guidelines do not significantly change the housing targets/requirements for Clare. However, and setting aside the additional provision, as demonstrated in Section 5.1 of this submission, Clare County Council are not meeting current requirements. The reasons for this vary but what is clear is that the subject lands have capacity and demand to accommodate additional housing that can be delivered in the short term.

#### **4.1.4 Sustainable Residential Development and Compact Settlement Guidelines 2024**

The “Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities” was published in 2024. These Guidelines built on and updated the previous policy recommendations that were published in 2009, “Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)”.

The Compact Settlement Guidelines set out policy and guidance in relation to residential development and the creation of sustainable and compact settlements. With regards to Cities and Metropolitan Areas, the Guidelines set out that the NPF sets ambitious growth targets for cities and metropolitan areas to 2040. The strategy for all cities is to support consolidation and intensification within and close to the existing built-up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport.

Athlunkard is situated in the Limerick City suburbs and forms part of the Limerick-Shannon Metropolitan Area. While it is defined as a Large Village in the Clare County Development Plan, the Core Strategy sets out that its population in 2016 was 3,486 and that the population target increase to 2029 is 395. The Development Plan Core Strategy Table also sets a density provision of 35 units per hectare for Athlunkard.

Having regard to the population and density requirements in the Development Plan, it is considered that Athlunkard sits within the 'Metropolitan Towns (> 1,500 population) – Suburban / Urban Extension' Area.

The Compact Settlement Guidelines sets out density ranges for Metropolitan Towns Suburban / Urban Extension areas as follows:

*“Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guideline that residential densities in the range of 35 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Metropolitan Towns, and that densities of up to 100 dph (net) shall be open for consideration at ‘accessible’ suburban / urban extension locations (as defined in Table 3.8).”*

#### **4.1.5 Development Plans - Guidelines for Planning Authorities (2022)**

Settlement Capacity Audits (SCA's) were introduced as part of the Development Plans Guidelines (DPG's) for Planning Authorities (2022) and accords with Appendix 3 to the NPF, which distinguishes between lands that are 'Serviced' (Tier 1) and those that are 'Serviceable' (Tier 2). This is to ensure that an informed decision can be made as to whether or not to zone land or sites in particular settlements for residential development and to inform the core strategy of the relevant Development Plan.

According to the DPG's, the SCA will comprise of:

- (i) a table providing, for each settlement >1500 people, or where lands are zoned in settlements of <1,500, existing population, potential housing estimates for
  - a. Tier 1 Serviced Lands
  - b. Tier 2 Serviced Lands
- (ii) accompanying maps that identify Tier 1 and Tier 2 lands or sites with potential for residential development in the individual settlements, with the existing built-up footprint (i.e. CSO Urban Settlement boundary) also indicated.

The DPG's advocate a sequential test<sup>2</sup> for residential zoning in settlements based on identifying lands situated within or closest to the settlement core (including brownfield, infill and redevelopment sites). The DPG's also state that where it is necessary to zone serviced or serviceable less central lands

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<sup>2</sup> The DPG's identify the following exceptions to the sequential approach where it is not possible to achieve sequential objectives e.g. physical or environmental constraint; where Tier 2 lands are positioned spatially closer to the core of a settlement than identified Tier 1 lands.

(i.e. 'Tier 2' lands), these shall be identified and prioritised on a spatially sequential basis i.e. with those most proximate to the core, given preference and first zoned for development.

The Guidelines also state that an SCA requires an infrastructural assessment of lands based on the following infrastructure categories:

- Road, footpath and cycle access including public lighting provision
- Foul sewerage drainage capacity at a settlement level and access of sites to the network
- Water supply capacity at a settlement level and access of sites to the network
- Access to surface water drainage.

## 4.2 Local Policy Context

The Clare County Development Plan 2022 (CDP) states that the population target for the county arising from the NPF is 7,231 people with a housing supply target of 4,500 provided by the Housing Supply Target Methodology.

Athlunkard is designated as being in the Limerick – Shannon Metropolitan Area and is designated as a 'Large Village'. The target increase in population for this settlement between 2023 and 2029 is 395 and the housing units target is 112 houses.

The Core Strategy notes the following in respect of being informed by the Housing Strategy and the Housing Need and Demand Assessment.

- The allocation of population growth to the settlements on a sustainable tiered approach based on the settlement hierarchy, the infrastructure services, demand, past delivery, jobs to resident workers ratio and potential growth. This means that settlements will grow at an appropriate rate and at a more self-sufficient level, thereby reducing the need to commute.
- The consolidation of settlements and the distribution of many land use types within settlement boundaries including a mix of uses in the centre of settlements will facilitate reduced travel demand and also increase usage of sustainable modes of transport.
- The quantum, location and distribution of new development has had regard to the capacity of existing and planned wastewater services infrastructure.
- The capacity of settlements to grow in the absence of necessary infrastructure, i.e. the Limerick Northern Distributor Road (LNDR) and geographical constraints such as the River Shannon, the Ardnacrusha Headrace, Parteen Bridge and flood zones in the Limerick suburbs; • Ennis 2040 An Economic and Spatial Strategy; and, • Environmental considerations have been taken into account in the preparation of the Core Strategy.

The focus of the Core Strategy is on developing and strengthening the role of the Key Town of Ennis, the Metropolitan Town of Shannon, the Limerick-Shannon Metropolitan Area, the Service Towns, Small Towns and villages and the sustainable development of our rural areas. The focus is on achieving

compact growth of our urban settlements thereby decreasing the distance that people must travel from their home to work and highlighting the importance of integrating land use and transportation planning. The plan seeks to develop the Town Centre First approach and the concept of a 10-minute town, which will make our towns and neighbourhoods better places to live, work and visit, improving the alignment of population and employment growth, sustainable mobility and climate action.

While the purpose of the Core Strategy is to identify locations across the county where future development is likely to take place it is not intended that an overly rigid approach to development would be employed by consenting authorities. The growth projections are to be viewed as targets rather than caps or limitations to growth within those individual settlements. Where there is scope within settlements and appropriately zoned land available, planning decisions which may include growth over and above the stated target as set out in the Core Strategy will be considered.

The Core Strategy includes 'Additional Provision' as per Section 4.4.3 of the Development Plan Guidelines, 2022. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing through inactivity on a particular landholding or site. Therefore, the use of the additional provision mechanism increases the probability of achieving the housing supply targets in the first instance.

In terms of development strategy, the policies of this Development Plan support the delivery of key growth for the Limerick Shannon Metropolitan Area in the NPF, RSES and MASP, having regard to the constraints in place, particularly in the Limerick suburbs area of Clare, in relation to wastewater and road infrastructure.

To achieve appropriate growth in the Clare LSMA area, the Core Strategy identifies a population growth target of 2,279 people and 1,406 housing units for the plan period. It is acknowledged that the population figure is slightly under that set out in the RSES, however the Limerick Suburbs area is currently constrained by a lack of wastewater treatment in Ardnacrusha, the lack of commitment on the LNDR and severe traffic congestion in Athlunkard, and also by the need to maintain the identity of Parteen as a separate settlement from Athlunkard. The population and housing allocation to the Limerick suburbs is deemed the maximum possible allocation, given the constraints in place for this plan period. The population allocation will be reviewed in future plan cycles.

The emphasis for the development of the Limerick-Shannon Metropolitan Area is on compact growth, which requires the provision of higher densities and mixed-use developments in urban settlements, in order to ensure a sufficient use of zoned lands and to optimise public investment in infrastructure. This requires the integration of land use and transportation planning, the intensification of use of existing underutilised land and the consolidation of the built environment through the development of

brownfield and infill lands, as well as the reuse of vacant and derelict properties.

Volume 3b of the Development Plan on 'Shannon Municipal District' covers the area of County Clare which lies within the Limerick-Shannon Metropolitan Area and includes maps for the relevant settlements including Athlunkard.

As shown in the zoning map at Figure 3, our client's site is located just north and to the immediate west of the existing settlement boundary and built-up residential area of Athlunkard.

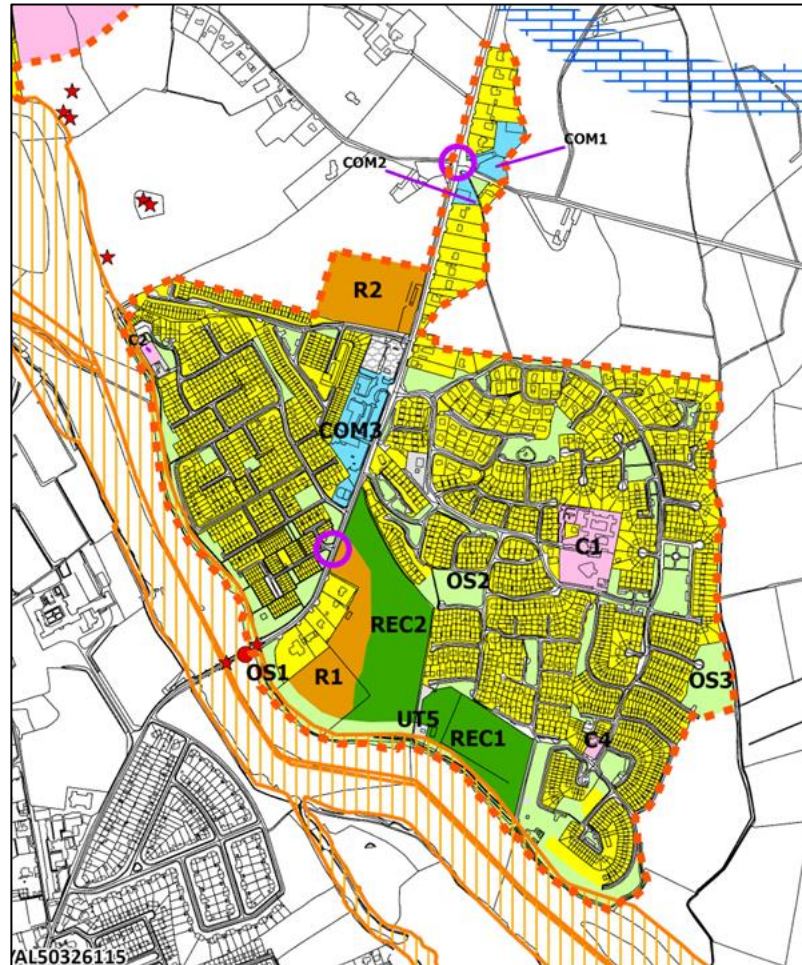


Figure 3 Zoning Map (Source: Clare County Council Planning Register)

The Development Plan sets out that the aim for Athlunkard is to strengthen the role of the Limerick-Shannon Metropolitan Area as an international location of scale and a primary driver of economic growth in the Southern Region.

The Development Plan also states that the village is served by a public water main (Limerick City) and is connected to the Limerick Main Drainage public wastewater treatment system which has sufficient capacity to cater for the target populations.

In terms of 'Housing and Sustainable Communities' the Development Plan sets out that:

*“The village contains two large housing estates, Shannon Banks and Westbury. The two residential areas are separated by the R463 regional road which bisects the settlement. As with the other Parteen villages, demand for residential development has come from both locals and Limerick commuters.*

*Constraints identified across the Parteen villages such as poor road infrastructure, limitations of available services infrastructure and lack of social infrastructure for the community may impact on the achievement of the population targets. Future development is strictly contingent on achieving a satisfactory resolution to these issues. In particular, there are capacity issues along the R463 due to high traffic volumes at peak times and this is exacerbated by the bottleneck at Athlunkard Bridge.*

*All sites zoned for residential development should incorporate sustainable urban drainage systems and shall include detailed proposals for landscaping/tree retention. Development proposals for housing shall also ensure the preservation of existing adjoining residential amenities and ensure a high overall standard of design, materials and finishes. Development proposals shall consider the pedestrian, walking and cycling network in tandem with the implementation of Limerick Bus Connects to prioritise multi-modal travel at the centre of its design and layout.”*

## 5. Rationale for Submission Request

### 5.1 Assessment of Existing Zoned Land / Housing Output

The 2023 CCDP's target and revised NPF housing targets for Clare County are **960** units and **985** units per annum respectively. However, the actual delivery of units since 2023 has fallen significantly short from the CCDP and NPF requirements. The actual housing completions for 2023, 2024 and 2025 on the CSO website for Clare County Council, were 403, 534 and 164 units respectively. This is approximately **over half of the CCDP/NPF targets** and is a shortfall of over 54% for the CCDP targets and over 55% for the NPF housing targets.

While it would appear that the Council zoned sufficient land for residential development, the reality is that the existing lands zoned for residential development are not delivering the required housing output.

While the reasons for this shortfall are varied, it would appear that the Council's current allocation doesn't allow for a 50% maximum headroom, which would bring the annual target from 960 units to 1,440 units. Infrastructural constraints across certain suburbs, are also a key factor contributing to shortfall. In this context, it is important to point out that Athlunkard has significant capacity in terms of social and physical infrastructure. There is capacity within the water and wastewater networks to accommodate additional loading, and the site can connect into Clonard Road to the north, adjoins existing footpaths and will facilitate improved pedestrian and cycle connections as part of future development as well as aligning with future bus connects works. The site can also facilitate connections to lands to the south to allow integration and permeability.

### 5.2 Need for Additional Residential Zoned Land in Athlunkard

As part of the Proposed Variation, the Core Strategy Table (Table 3.6) has been updated to reflect the housing unit target for Athlunkard as being 146 units from Quarter 1 2026 to Quarter 1 2029. Furthermore, it considers that 69 units have the potential to be delivered on residential zones within the settlement.

It states that no 'newly identified residential land' has been included as part of the variation, however, 10.13 hectares of land have been allocated as 'Newly Identified Long Term Strategic and Sustainable Development sites' with the potential to bring forward 355 housing units.

The land allocated for this long-term development in Athlunkard is identified as LT1 in Proposed Amendment No.'s 3b-7 and 3b-8 in Volume 3b of the Development Plan. It relates to a large parcel of land to the east of the Corbally Road and to the north of Westbury residential estate.

These amendments define 'Long Term Strategic and Sustainable Development sites' as:

*"These sites have been identified for the long-term strategic and sustainable expansion of the settlement and indicate where future infrastructure upgrades and capital investment is required to meet the needs of the settlement **beyond this plan period.**"*

While the allocation of land for long term strategic is a positive for Athlunkard, it does not make provision for development to be brought forward within the lifetime of the current Development Plan period.

Therefore, notwithstanding the important role Athlunkard plays in terms of its proximity to Limerick and employment opportunities as well as the demand from locals and commuters for residential development, no land has been zoned specifically for new residential within the current plan period.

As part of the Development Plan, there are two sites zoned for residential, R1 Riverside Site in the south-eastern part of the settlement and R2 lands to the immediate south of our client's site. The R2 lands already benefit from a permission for c. 101 houses, however, from a desktop search of the planning register, there is no record of any planning applications for the R1 lands.

There do not appear to be any infill or greenfield sites within the existing built-up area of Athlunkard so this leaves no options for residential development to be brought forward anywhere else in the settlement beside the R1 lands. The R1 lands have also benefited from longstanding residential zoning as they were zoned for R1 residential in the 2017-2023 Clare County Development Plan. As there is no guarantee when the R1 lands will be brought forward, this further emphasises the need to provide additional residential zoned land in order to allow for alternative options to facilitate housing growth in line with the NPF Implementation: Housing Growth Requirement Guidelines.

Our client's site is located just to the north of the R2 residential zoned lands and immediately adjoins the settlement boundary to the east so will form a natural extension of the settlement. Furthermore, given the requirement to provide a 50% uplift of residential units, the strategic importance of the subject site has increased significantly based on the NPF review.

### 5.3 Suitability of Site for Residential Development

#### 5.3.6 Compact, Sustainable and Sequential Growth

The site is located on the edge of the settlement of Athlunkard and would form a natural sequential development of this established residential area. It would benefit from both existing infrastructure and planned infrastructure as part of future planned infrastructure works as a result of Bus Connects and LSMATS. It is within walking distance of key village services (c. 220 metres) and within a short commuting distance of established employment bases within Limerick City. It will therefore result in sustainable and

sequential growth of the village and will provide an opportunity to provide compact growth. This is consistent with the RSES which notes that “*where practicable, development within the metropolitan area should be carried out sequentially, and lands which are, or will be, most accessible by walking, cycling and public transport*”.

National guidelines place a focus on prioritising residential development on lands that are served by existing and / or planned high quality public transport corridors and that also contribute to the development of compact towns and villages. The site benefits from access to frequent bus services and is therefore vital to ensuring consolidated growth is achieved.

The site will provide the opportunity to manage the sustainable growth of Athlunkard, in line with the NPF and support an integrated land use and transport system, by maximising the potential of the site's proximity to future bus connects public transport corridors. This will ensure that Athlunkard will play a key role in promoting more sustainable led transport development. The proposed development will deliver on the objectives of the LSMATS to significantly intensify and consolidate future housing, employment and educational development along public transport corridors. The CMATS also places a particular emphasis on enhancing the bus and cycle routes to encourage future residential development to integrate and align with public transport services in order to achieve compact growth and more sustainable travel led developments.

### 5.3.7 Supporting Infrastructure

#### Services Infrastructure

There is a proposed amendment as part of the variation to Volume 1 of the Development Plan which is as follows:

*“To achieve appropriate growth in the Clare LSMA area, the Core Strategy revised by Variation No.1 to this plan in 2026 (on foot of the ‘NPF Implementation: Housing Growth Requirements’ of July 2025) identifies a ~~population~~ growth target of ~~2,279 people and 1,406~~ 1,318 housing units for the remainder of the plan period. ~~It is acknowledged that the population figure is slightly under that set out in the RSES, however the~~ The Limerick Suburbs area is currently constrained by a lack of wastewater treatment in Ardnacrusha, the lack of commitment on the LNDR and severe traffic congestion in Athlunkard, and also by the need to maintain the identity of Parteen as a separate settlement from Athlunkard. The ~~population and~~ housing allocation to the Limerick suburbs is deemed the maximum possible allocation, given the constraints in place for this plan period. The population and housing allocation will be reviewed in future plan cycles.”*

While it is acknowledged that there are a number of infrastructure issues across the Clare LSMA, it is important to note that Athlunkard does not have any water or wastewater capacity issues. Indeed, Volume 3b of the Development Plan states the following:

*“The village is served by a public water main (Limerick City) and is connected to the Limerick Main Drainage public wastewater treatment system which has sufficient capacity to cater for the target populations.”*

It is therefore considered that there is adequate capacity within the network to accommodate our client’s site and that it is therefore fully serviceable. Furthermore, the Uisce Éireann website confirms that capacity is available for both water supply and wastewater treatment.

#### Roads and Public Transport Infrastructure

In Volume 3b of the Development Plan, there are two junctions identified on the zoning map for Athlunkard for upgrade, one to the north of the settlement and one to the south of the settlement. The Core Strategy also sets out that Athlunkard is currently constrained by severe traffic congestion.



Figure 4 Zoning Map (Source: Clare County Development Plan 2023-2029)

The client’s site presents a unique opportunity within Athlunkard as it has dual frontage onto both the Corbally Road and Clonard Road. As part of the permitted development to the south, there is also a future connection provided as part of that development to lands to the north so our client’s site has the potential to connect in with these lands. The site doesn’t rely exclusively on the Corbally Road for access and can therefore offer alternative options to manage traffic flow and reduce traffic congestion. For example, a schematic layout has been prepared for the site and demonstrates that access can be gained via Clonard Road and that the development has also been designed to facilitate future access from lands to the south. It will also promote walking and cycling and use of public transport options as well as link in with existing and future planned pedestrian and

cycling infrastructure in order to increase modal shift and provide a more sustainable development.

In respect of the permitted development (25/60108) to the south, a Traffic and Transportation Assessment by MHL Consulting Engineers was submitted in support of the application. It assessed overall cumulative impact of the permitted development on the adjoining local road network including allowing for existing traffic and associated growth rates to 2041. It states that the overall impact of the proposed development will increase traffic Ratio of Flow to Capacity (RFC) by a maximum of 9% at Junction 1, 19% at Junction 2 and 2% at Junction 3 (refer to figure 5 for location of junctions). This shows that junctions 1 and 2 are operating below capacity for all design years up to 2041 and that Junction 3 is currently operating over capacity at an RFC of 91% in the 2024 PM and in 2041 AM and PM would have a RFC of 65.4% and 107.2% respectively with the development and a max RFC of 63% and 105.2% with the permitted development.

The report states that the percentage increase in RFC on the surrounding road network falls below 5% for Junction J3 as a result of the proposed development and that a full Traffic and Transport Assessment is not warranted at these junctions as the 5% threshold set out by the NRA Traffic and Transport Assessment Guidelines 2014.

Overall, the report concludes that the permitted development would cause a negligible impact on the analysed junctions and road network.



Figure 5 Extract from Traffic and Transport Assessment Submitted with Planning Ref. no. 25/601608 (Source: Clare County Council Planning Register)

In the Clare County Council Planner's Road, it is noted that as part of pre-planning discussions, the Applicant was advised by the Road Design Office that direct access from the development onto Corbally Road would not be suitable. While this was taken on board in terms of the final layout, the generated traffic from the development still filtered into the Corbally Road and the traffic report by MHL still concluded that traffic from the permitted development would have a negligible impact on the road network. The Road

Design Office also noted that in the overall context of the proposal and its location, the development will have a minimal impact on the R463.

It's also important to note that in the traffic report submitted for the permitted development to the south, a worst-case scenario was adopted in the terms of the modelling and didn't allow for any modal shift in the analysis.

This is important for our client's site as it demonstrates that there is capacity within the road network to accommodate additional traffic. Notwithstanding this, it is considered that the subject site can facilitate alternative access points to manage traffic flow. Furthermore, any potential future planning applications would be subject to the relevant traffic assessments and consultation would be undertaken with the Council's Road Design Office to ensure traffic flow is managed appropriately.

The Development Plan acknowledges that:

*"Athlunkard is situated within the Limerick-Shannon Metropolitan Area and the area for the Limerick-Shannon Metropolitan Area Transport Strategy 2040 (LSMATS). The strategy seeks to deliver a high quality, accessible, integrated and more sustainable transport network that supports the role of the Limerick-Shannon Metropolitan Area as the major growth engine of the Mid-West Region, as an internationally competitive European city region and the main international entry point to the Atlantic Corridor.*

*The Limerick city bus network provides services to and from Athlunkard, providing a valuable alternative to the private car, and encouraging a shift towards more sustainable transport options. Walking and cycling should be promoted as part of linked trips with public transport. The pedestrian and cycling environment and permeability within and connectivity between residential areas, retail and community facilities should be strengthened."*

Athlunkard already benefits from established public transport services linking the settlement with Limerick City and services. There is a bus stop on the Corbally Road opposite the Shannon Banks estate, and 650 metres to the south of the subject lands. This serves the 301-bus route from Athlunkard to Limerick City and the University Hospital. It has a typical frequency of 20-30 minutes and operates daily. Under Bus Connects proposals, the frequency of the bus service to Athlunkard is to provide a more frequent daily service of every 15 minutes. There are also bus service routes proposed within the existing residential estates of every 30 minutes.

Bus route 313 also travels via Athlunkard from the city centre to Ardnacrusha with a stop on the Corbally Road. This bus provides five services a day. As part of Bus Connects, the frequency will move to every 60 minutes 7 days a week.

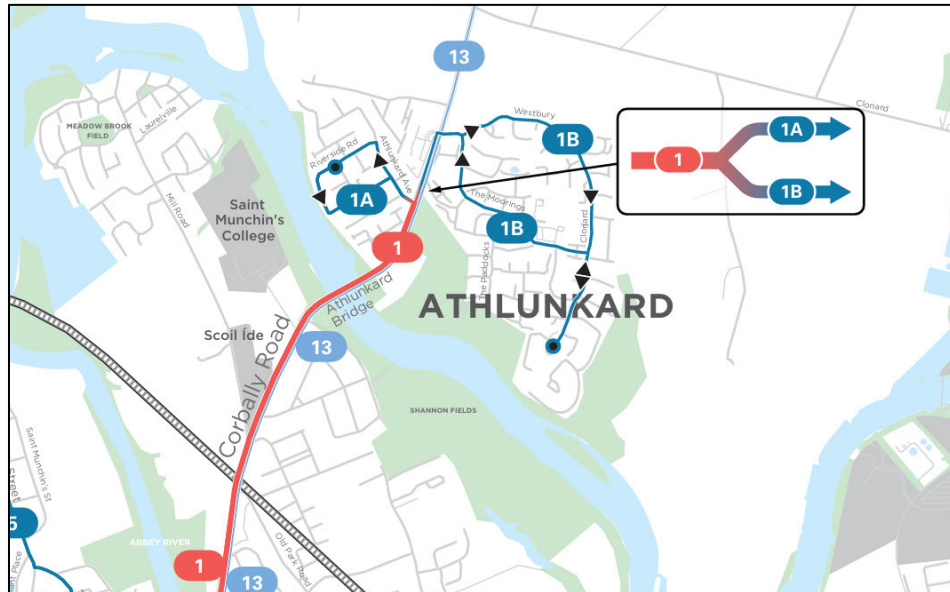


Figure 6 Bus Connects Proposals for Athlunkard (Source: Bus Connects Website)

The permitted development to the south of the subject site has included for provision of new pedestrian and cycle connections including a footpath along the Corbally Road which has been set back to allow provision for future bus connects works and also works to be delivered under LSMATS. Our client's site will be able to link in with these works adjoining the Corbally Road.

As part of LSMATS, a primary cycle route is proposed connecting Limerick with Parteen and which travels directly through Athlunkard along the Corbally Road.

The subject lands, as illustrated in the accompanying schematic layout, demonstrate that a focus has been placed on promoting walking and cycling and promoting use of public transport options in order to increase modal shift and provide a more sustainable development.

### 5.3.8 Social Infrastructure and Employment Opportunities

The settlement of Athlunkard is strategically located within a short distance of Limerick city where there is a strong employment base and frequent daily bus connects. The site is located just north and immediately west of established residential areas and also located approximately 200 metres to the north of a mix of commercial uses within the Corbally Shopping Centre including supermarkets (Lidl and Tesco Express), eateries, shops and crèche as well as filling stations to the south and east. There are established third level educational facilities in Limerick as well as a hospital and extensive range of commercial shops and professional services.

There is a primary school (Scoil Íde) and a secondary school (St. Munchin's College) approximately 1.4 metres to the south-west of the site along Corbally Road along with amply recreational facilities including riverbank walks along the River Shannon and Abbey Sarsfield GAA close to Scoil Íde.

Having regard to the sites existing and future public transport works, it will provide the opportunity to provide a well-connected and walkable neighbourhood that will create a positive experience for future residents and will provide a quality of life that enriches everyday life.

Given its strategic location, strong infrastructure base, public transport links, and proximity to existing residential lands and Limerick city, the subject site will contribute towards sustainable consolidation and compact urban growth.

### **5.3.9 Density**

This site can deliver a density of between 35 to 50 units per hectares as per the CCDP and Compact Guidelines. The schematic site layout plan that accompanies this submission demonstrates that the site will create a liveable, integrated residential development with a mix of house types, tenures and sizes linked to active and public transport. The site has access to amenities, services and community/cultural facilities and will deliver an inclusive and sustainable neighbourhood. The site layout plan also demonstrates that community services such as a creche can be accommodated on the site.

## 6. Conclusion

This submission is made on behalf of Mary de Courcy and Owen O'Meara and relates to land at Knockballynameath, Athlunkard, County Clare.

The subject site represents an opportunity for the Council to zone lands for residential development that are demonstrably deliverable.

As part of this submission, it is requested that the **subject lands be zoned for residential use** and that **the settlement boundary of Athlunkard be amended to include the subject lands.**

It is concluded that the subject lands are suitable for residential development for the following reasons:

- **It is a fully serviced site and there is capacity within the water and wastewater network.**
- **It will contribute to sustainable, compact and sequential growth.**
- **Located in an area with good public transport and will benefit from planned future Bus Connects Works.**
- **Athlunkard is located within a short commuting distance of a strong employment base and services within Limerick city.**
- **The site is located within c. 200 metres of local commercial services.**
- **The site provides alternative options for managing access and flow of traffic.**
- **There is a market demand for housing in the area from both locals and commuters to Limerick City as acknowledged in Volume 3b of the Clare County Development Plan on the settlement of Athlunkard.**

The subject site is located on the edge of the settlement of Athlunkard and immediately adjoins the existing built-up footprint to the east with residential development located to the south. The site has good accessibility to existing public transport and will benefit from planned infrastructure under LSMATS and Bus Connects. This will result in a well-connected and walkable site that will create a sustainable and compact neighbourhood. In order to optimise the development potential and infrastructure capacity in this strategic location within a short commuting distance to Limerick City, it is considered that the lands should be zoned for residential development as they are well-positioned to contribute significantly to meeting the housing targets in alignment with the revised NPF and CCDP policy objectives.

Furthermore, our client's site is fully serviceable, immediately adjoins the settlement to the east and can facilitate delivery of housing in the short to medium term and is within walking distance of the village services.

This site is well-positioned to contribute significantly to meeting local housing needs in alignment with established policy objectives. The development potential of this site supports the delivery of a substantial number of

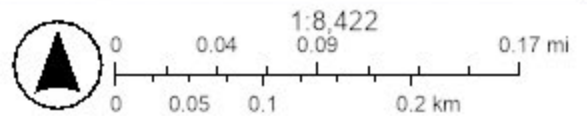
residential units, consistent with strategic planning goals for sustainable housing growth.

## Appendix 1 Location Map

# ArcGIS Web Map



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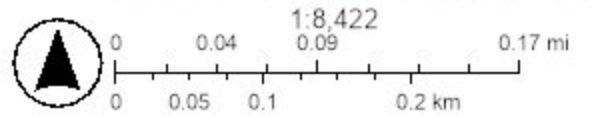


Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, Intermap, NASA, NGA, USGS

# ArcGIS Web Map

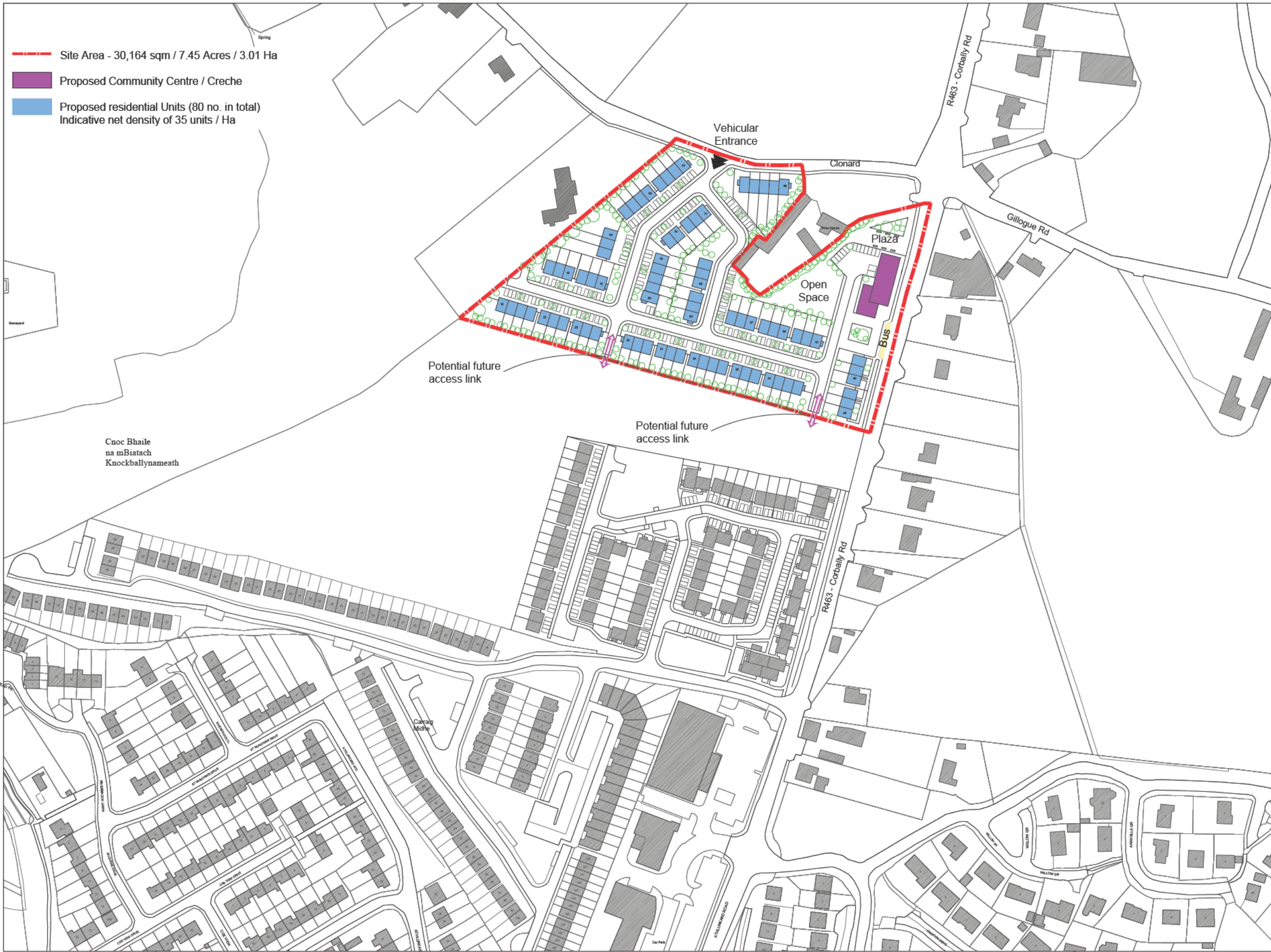


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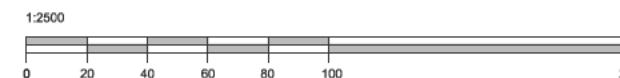
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## Appendix 2 Schematic Site Layout Plan



# INDICATIVE SITE LAYOUT PLAN

SCALE 1 : 2,500



- NOTES:
1. All dimensions are in millimeters.
  2. Dimensions are not to be scaled directly from this drawing, except for planning purposes.
  3. All references to drawings refer to the current revision of that drawing.
  4. Structural and services information shown is indicative only. Refer to Consultants drawings for details and setting out.

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drawing title  
 Indicative Site Layout Plan

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