

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029
Date: Saturday 4 April 2026 11:19:26
Attachments: [Map of Kilrush – Proposed Variation No 1 Markup R12.pdf](#)
[Submission on NPF Housing Growth – Additional Residential Lands.pdf](#)

Dear Sirs

I wish to make a submission in respect of Proposed Variation No. 1 to the Clare County Development Plan 2023–2029, and in particular the proposed Residential Zoning R12, West of the Town Centre, Shanakyle Road (PA 3d–8e).

Matter of the Submission

While the proposed Variation includes lands along Shanakyle Road within the R12 residential zoning, a portion of lands forming part of the same folio, for which a submission was previously made, has been excluded from the zoning. This excluded area is contiguous with the R12 lands and shares identical locational, physical and planning characteristics.

Planning Considerations

The excluded lands:

- Form part of the same landholding and are immediately adjacent to the proposed R12 zoned lands and established residential development at Beal an Inbhir / Estuary View and Carrig Dónaun;
- Are located within the same gateway setting at the entrance to the town and enjoy similar aspect and outlook towards the marina and Shannon Estuary;
- Are accessible from Shanakyle Road and Beal an Inbhir and are capable of being integrated into a coherent and comprehensive residential layout.

The omission of this parcel creates an arbitrary zoning boundary which leaves a small parcel of land unzoned while all surrounding it is zoned and some already developed.

Deliverability

The owners of the lands are willing and in a position to develop the site, subject to the granting of planning permission. The lands are capable of accommodating residential development consistent with the stated R12 zoning objectives, including:

- High-quality design and layout appropriate to the gateway location;
- Retention of existing hedgerows and mature trees where feasible;
- Provision of safe and attractive pedestrian and cycle connectivity to the town centre.

Policy Context

The inclusion of the omitted lands would support:

- A coherent zoning pattern along Shanakyle Road;
- The efficient use of well-located land adjoining the town centre;
- The objectives of compact growth, sustainable settlement patterns and housing

delivery underpinning the Development Plan and Proposed Variation No. 1.

Request

It is respectfully requested that Proposed Variation No. 1 be amended to include the excluded portion of lands on the same folio within the R12 Residential Zoning, subject to the same development standards and objectives applicable to the remainder of the R12 lands.

I am attaching a copy of the Map for Proposed variation No 1 marked up for ease and also a copy of the original submission where the subject lands were included as can be seen on page 4.

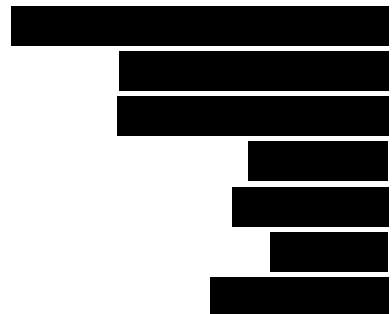
If you have any queries in relation to the above please do not hesitate to contact me.

Yours faithfully

Richard Maguire



Submission on NPF Housing Growth – Additional Residential Lands



December 2025

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1.0 INTRODUCTION

Leadmore West Partnership have prepared this submission to Clare County Council in respect of the Clare County Development Plan 2023–2029, as varied under the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025).

Leadmore West Partnership’s landholding comprises 2.13 hectares located west of Kilrush town centre on Shanakyle Road, adjoining Beal an Inbhir, Shanakyle Road, Kilrush. The land straddles the defined settlement boundary, with 0.45 hectares previously zoned residential under the Clare Development Plan 2017–2023. The Development Plan of 2023 – 2029 removed all zoning from the landholding.

This submission requests the reinstatement of the residential zoning on the 0.45 hectares and the zoning of the remaining 1.68 hectares for residential use, consistent with the new Section 28 Guidelines which require planning authorities to provide for housing growth requirement additionality of up to 50% and to prioritise serviced, sequentially located lands.

2.0 BACKGROUND

2.1 Location & Characteristics of Site

The subject land is located 820m west of the town centre on the Shanakyle Road, neighbouring the existing town graveyard and immediately adjoining recently constructed residential units, 18 of which were purchased by Clare County Council. The land is undulating, falling towards the public road and are fully serviceable with water and sewerage connections available from adjoining lands. Shanakyle Road is currently served with public footpaths and lighting to a point immediately east of the subject land. Refer to Figure 1.0.

Measuring 2.13 hectares in area, the land is defined by existing housing to the east, greenfield land to the north and west and by the Shanakyle Road to the south. The northern extremity of the site is very much brownfield in nature, having previously been used for storage purposes.

Kilrush is identified as a ‘Service Town’ in the County Development Plan 2023 to 2029, intended to act as an important service centre, an attractive place to reside and do business and as a driver of growth, serving a wide catchment area. With a population of 2,650 persons as per the Census of Population 2022, the Plan envisages the town to grow by 355 persons over the plan period, between 2023 and 2029. The subject lands are ideally positioned to contribute to this growth in a sustainable manner.






-  Landholding
-  Kilrush Town Centre
-  Kilrush Settlement Boundary

Figure 1.0 Location of the Subject Lands

2.2 Planning History

Outline planning permission was previously granted on part of the subject land in 2010 (planning file reference no.10/05) to construct 6 no. detached units. That part of the landholding granted planning permission adjoined the existing residential development to the east of the site which has recently been completed.

This historic permission, although now withered, confirms that residential development on the subject land, must be deemed acceptable in principle.

3.0 NEED FOR A REVISED APPROACH

3.1 Existing & Previous Development Plan

The Clare County Development Plan 2017 contained the West Clare Municipal District Settlement Plan and zoned part of the subject land (0.45 hectares) for residential purposes as detailed in Figure 2.0. The zoning formed part of the overall development of lands identified as R2 and the Council in its Development Plan clearly stated that “the Council favours the completion of the Beal an Inbhir estate”, which is the estate adjoining the subject lands to the east. The current Plan, however, removed this zoning, notwithstanding the continued objectives of balanced population growth and housing provision. In addition previously in 2017 the town boundary was moved from the centre of the 1.68 hectares to bound the Beal an Inbhir Estate. This was undertaken at a different time from which we find ourselves now with an urgent need for residential housing.

In the current Development Plan, it is stated that,

“Residential use shall be taken to primarily include the use of land for domestic dwellings. It may also provide for a range of other uses particularly those that have the potential to foster the development of new residential communities e.g. schools, crèches, open spaces etc.”

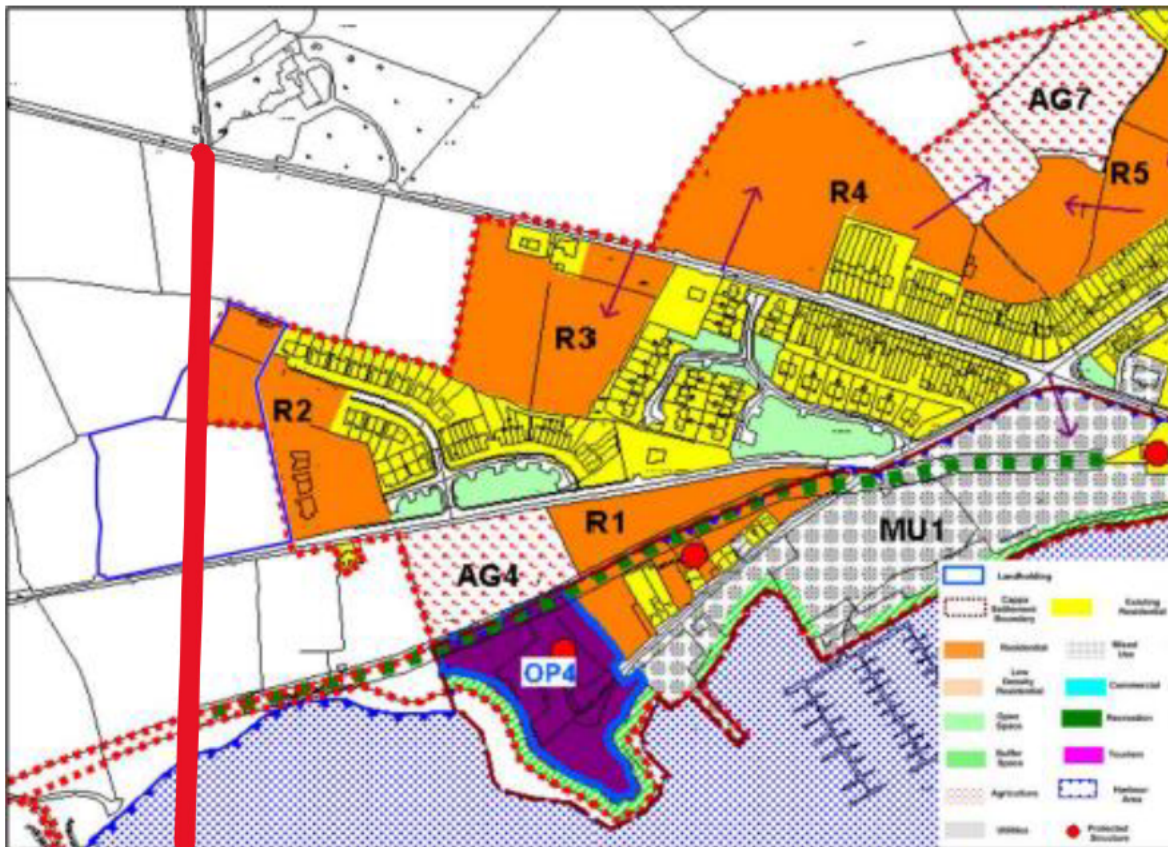
The settlement of Kilrush is identified as a Service Centre in the existing Development Plan with clear objectives in the Plan,

“to ensure that Kilrush town, Cappa and the rural hinterland achieve a sustainable and balanced population increase by providing a high quality and mix of housing for all members of the community whilst conserving the distinctive character of the settlement area”.

The Development Plan also seeks,

“to develop Kilrush as a key location in West Clare for industry, employment, enterprise, renewable energy and maritime research and development based on the availability of a vibrant working population and a high quality environment in which to work and do business”.

These objectives have been included in the previous development plan also and carried forward into the current Plan and demonstrate the importance of promoting residential growth in the town to facilitate a vibrant working population whilst conserving the distinctive character of the settlement area.



 Original Town Boundary to 2017

Figure 2.0 - Previous Zoning 2017 to 2023



Figure 2.1 - Current Land Use Zoning 2023 - 2029

3.2 Development Plan

The current Development Plan has changed the zoning on part of the land such that none of the land is now zoned for a development purpose. See Figure 2.1. This change has occurred notwithstanding continued objectives in the current Plan to ensure that Kilrush town achieves a sustainable and balanced population increase and that a high quality and mix of housing is provided for all members of the community.

The Development Plan envisages the town to grow by 355 no. persons over the plan period, between 2023 and 2029 and has zoned 11.9 hectares of land to facilitate such growth. The 11.9 hectares is intended to accommodate circa 180 no. residential units, equating to a density of circa 15 units per hectare, assuming all land is available for development and is developable. In this regard, it is noted that the Plan has not made any provision for lower density sites, commensurate with the national strategy to facilitate New Homes in Small Villages and Towns, all in accordance with Policy Objective RPO26(g) of the RSES and the new NPF Guidelines. The national strategy promotes balanced regional development ensuring that rural communities remain viable and well-served.

The subject site, located on the fringe of the town, but within a 10 minute walking distance of the town centre (820m) would be particularly suited to lower density housing provision and further would facilitate greater connectivity between the town centre and the neighbouring graveyard which serves the town and surrounding rural area.

The Development Plan Guidelines 2021 recognised that there was a need for some degree of competition and choice in the residential development land market. In this regard it is submitted that the supply of residential zoned land in the town needs to be reconsidered to provide for market choice and to diversify future delivery and different house types and models over the plan period 2023 – 2029, now 2026 to 2029.

4.0 POLICY CONTEXT

The National Planning Framework (First Revision 2025) requires the delivery of 50,000 homes per annum to 2040, with at least 40% of new homes located within existing settlement footprints. Compact growth, sequential development, and the “10-minute town” concept are central to this approach.

4.1 National Planning Framework (NPF)

The NPF Implementation Guidelines (2025) set Clare County Council’s housing growth requirement at 985 units per annum between 2025 and 2034, and 687 units per annum between 2035 and 2040. The Guidelines also permit additional provision of up to 50% above baseline to ensure activation of serviced lands. Planning authorities are required to undertake Settlement Capacity Audits and prioritise serviced, centrally located lands.

It is considered that a viable, alternative approach to housing is required in towns such as Kilrush, with a balanced approach to density necessary to ensure a practical alternative to living in the countryside. The subject land can deliver such an approach, providing lower density housing on serviced land, within a 10 minute walk of the town centre, but yet within a more rural landscaped setting.

4.2 Regional Spatial Economic Strategy (RSES)

The RSES for the Southern Region supports serviced sites in small towns and villages, promotes “build your own home” opportunities, and identifies Kilrush as an economic driver linked to Moneypoint’s green energy hub renewable energy potential.

The strategy for the Southern Region as set out in the RSES is to build a strong, resilient, sustainable region with eleven ‘Statements of the Strategy’ identified including Compact Growth. Strengthening and growing our cities and metropolitan areas; harnessing the combined strength of our three cities as a counterbalance to the Greater

Dublin Area, through quality development; regeneration and compact growth; building on the strong network of towns and supporting our villages and rural areas. The Strategy focuses on 'Key enablers' including 'Revitalising Rural Areas' through readapting our small towns and villages and increasing collaboration between networks of settlements to seek higher value, diversified jobs for a higher quality of life.

The RSES has built on these principles and has included an objective to promote the "10- minute" town concept, whereby community facilities and services are accessible within short walking timeframe

In Section 5.0, the RSES recognises that the NPF acknowledges that there is a need for more proportionate and tailored approaches to residential development. This means that it is necessary to adapt the scale, design and layout of housing in towns and villages, to ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village.

5.0 DEVELOPMENT INTENT

It is proposed to advance a low-density, high-quality residential development on the subject lands, providing a viable alternative to one-off rural housing. There is immediate market interest in serviced sites for private homes, and the development would support Kilrush's economic role by attracting and retaining skilled workers.

In addition to housing, the proposal includes public realm improvements such as extending the footpath and lighting towards the graveyard. These measures would enhance community connectivity and amenity.

It should be noted that the owners of the land are intent on developing the subject lands in the short term and will deliver development outcomes on the subject land.

6.0 SEQUENTIAL APPROACH TO DEVELOPMENT

The subject lands are located entirely within the 1,500-metre walk-time boundary from Kilrush town centre, making them more centrally located than other zoned lands. They are fully serviced and capable of immediate activation.

The NPF strategy incorporates National Strategic Objectives which seek to have zoned lands and sites within the settlement consistent with sequential development patterns, town centre first principles, proximity to services and facilities and the need to reduce carbon emissions set out in SPPR DPG 7 and NPO 101 of the NPF.

SPPR DPG 7 of the Draft Development Plan Guidelines states that,

“Planning authorities shall adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently”.

7.0 THE REQUEST

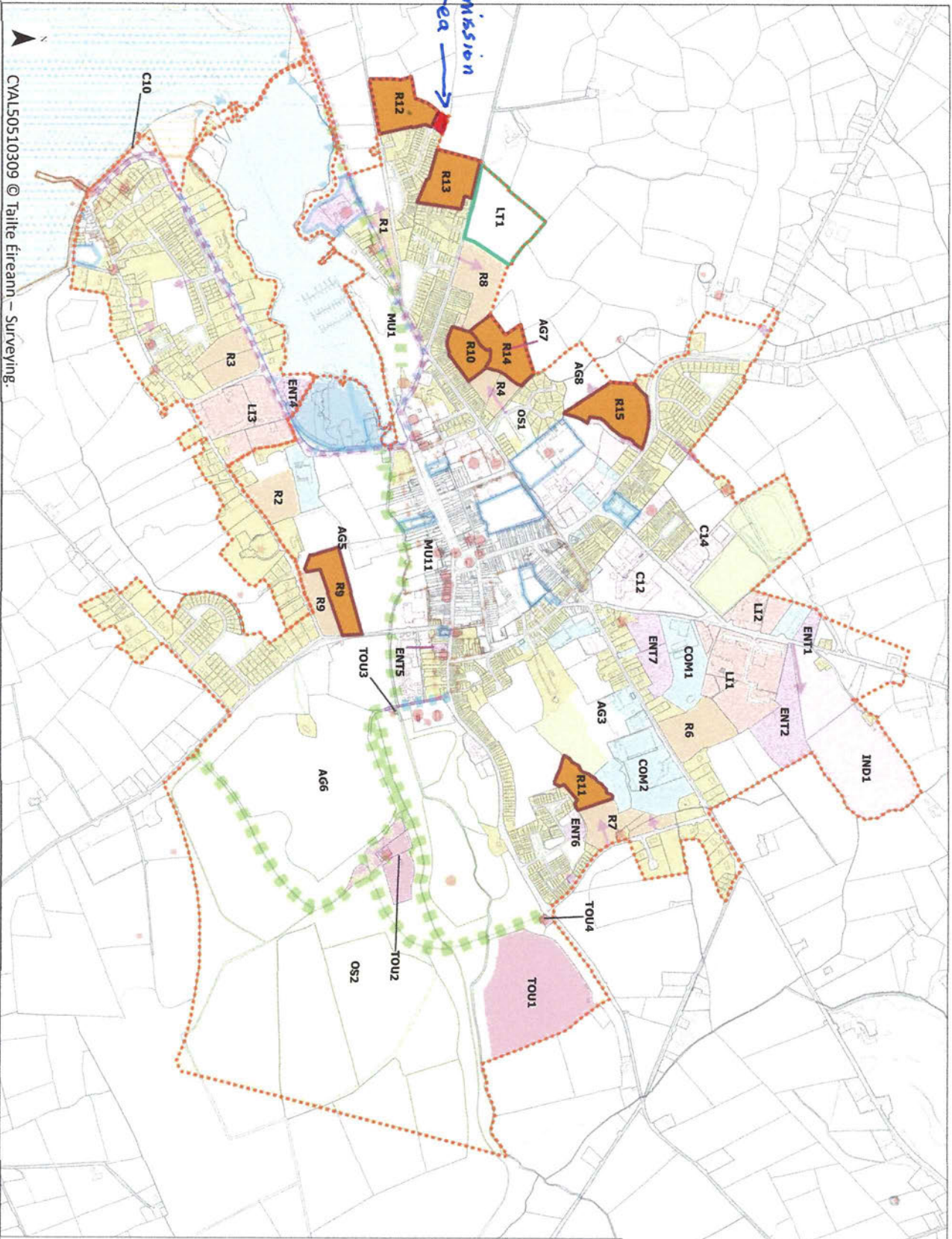
In light of the above, it is requested that Clare County Council:

1. Extend the settlement boundary to fully incorporate the subject lands.
2. Reinstate residential zoning on the 0.45 hectares currently proposed as agriculture.
3. Zone an additional 1.68 hectares for residential use, consistent with the NPF Guidelines (2025) which allow up to 50% additional provision.

This approach will activate serviced, sequentially located lands, deliver immediate housing outcomes aligned with national housing growth requirements, and support compact growth, the “10-minute town” concept, and Kilrush’s role as a Service Town.

8.0 CONCLUSION

The removal of residential zoning from the subject lands is inconsistent with the NPF Implementation Guidelines (2025), the NPF First Revision, and the RSES. The subject lands are serviced, centrally located, and capable of immediate delivery. Their rezoning will directly contribute to Clare County Council’s housing growth requirements, provide market choice, and support the sustainable development of Kilrush.



Submission Area

CVA150510309 @ Tailte Eireann – Surveying

Legend	
	Settlement Boundary
	Proposed Zoning
	Long Term Strategic and Sustainable Development Sites
	Residential
	Current CDP Land Use
	Existing Residential
	Residential
	Strategic Residential Reserve
	Mixed Use
	Commercial
	Tourism
	Enterprise
	Light Industry
	Industry
	Community
	Recreation
	Open Space
	Agriculture
	Buffer Space
	Maritime / Harbour
	Opportunity Site
	Protected Structure
	Recorded Monument
	Architectural Conservation Area
	Special Protection Area
	Special Area of Conservation
	Indicative Access
	Public Right Of Way
	Walkway Cycleway Greenway
	Indicative Route of the West Clare Railway Greenway
	Water Bodies
	Town Centre Area
	Kilrush Harbour
	Utilities

Clare County Development Plan 2023 - 2029 - Proposed Variation No. 1

Kilrush