

From: [REDACTED]
To: [Development Plan](#)
Cc: [REDACTED]
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029
Date: Tuesday 7 April 2026 12:29:39
Attachments: [REDACTED]

Submission to Variation No.1 to the Clare County Development Plan 2023-2029 – Kilrush

On behalf of our client Gary Egan (landowner), please find attached submission prepared by MKO to request the rezoning of lands from existing zoning of 'Agriculture' to proposed zoning of 'Residential' as part of the proposed Variation No. 1 of the *Clare County Development Plan 2023-2029* (CCDP). The subject lands are located in the townland of Leadmore East, Kilrush, Co. Clare.

Please also find attached on a separate sheet to the content of the submission/ observation, MKO contact details as requested.

We would appreciate confirmation of receipt of the submission at your earliest convenience.

Enclosures:

- Submission to Variation No.1 to the CCDP 2023-2029 Kilrush
- Organisation contact details on a separate sheet

Best regards,
Aideen

Aideen Gough
Project Planner

MKO
Tuam Road, Galway, H91 VW84
Offices in Galway and Dublin



JOIN OUR TEAM

One of our goals is to be the company that the best people in our fields aspire to work and grow with. Explore our open roles today.

[Click here for further details](#)





McCarthy Keville O'Sullivan Ltd t/a MKO. Registered in Ireland No: 462657. VAT No: IE9693052R

MKO Water Limited t/a MKO. Registered in Ireland No: 338589. VAT No: IE6358589Q

MKO Estates & Project Management Ltd. Registered in Ireland No: 613029. VAT No: 3497897JH

This email and any attached files or emails transmitted with it are confidential and intended solely for the use of the individual(s) or entity to whom it is addressed. If the reader is not a representative of the intended recipient(s), any review, dissemination or copying of this message or the information it contains is prohibited. If you have received this email in error please notify the sender of the email and delete the email. MKO does not represent or warrant that any attachment hereto is free from computer viruses or other defects. The opinions expressed in this e-mail and any attachments may be those of the author and are not necessarily those of MKO.

Contact details regarding a submission made by MKO to the Variation No.1 to the Clare County Development Plan 2023-2029 on behalf of landowner Mr Gary Egan. The subject site is located in in the townland of Leadmore East, Kilrush, Co. Clare.

As requested by Clare County Council the name and contact details (and where relevant, details of any organisation, community group or company etc., which you represent), is submitted on a separate sheet to the content of your submission/ observation.

Planning Agent / Organisation: MKO

Address: Tuam Road, Galway, H91 VW84

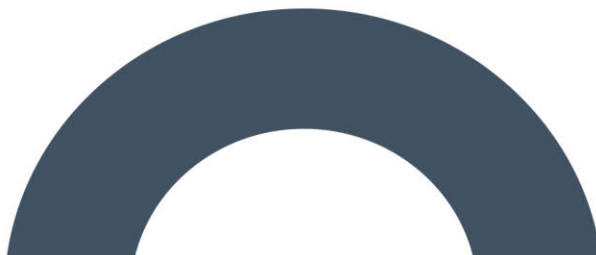
[REDACTED]

[REDACTED]

[REDACTED]

Rezoning Submission to Variation No. 1 of the Clare County Development Plan 2023-2029

Rezoning request for lands
located in Kilrush, County
Clare





DOCUMENT DETAILS

Client: **Mr Gary Egan**

Project Title: **Rezoning request for lands located in Kilrush, County Clare**

Project Number: **251239**

Document Title: **Rezoning Submission to Variation No. 1 of the Clare County Development Plan 2023-2029**

Document File Name: **251239 Egan - Kilrush - V1 DPS - F1 - 2026.04.06**

Prepared By: **MKO
Tuam Road
Galway
Ireland
H91 VW84**



Rev	Status	Date	Author(s)	Approved By
01	Draft	31/03/2026	RM	AG
02	Draft	01/04/2026	RM/AG	PH
03	Final - Client Review	01/04/2026	AG	PH
04	Final	06/04/2026	AG	PH

Table of Contents

EXECUTIVE SUMMARY	2
1. INTRODUCTION.....	3
1.1 Site Location.....	3
1.2 Proposed Zoning.....	5
2. RATIONALE FOR REZONING.....	7
2.1 Item 1: Housing Targets and Requirements for Rezoning of New Residential Land	7
2.2 Item 2: Previous Zoning of Subject Site.....	7
2.3 Item 3: Principle of Development	8
2.4 Item 4: Criteria for Re Zoning	8
2.5 Item 5: Suitability of the Subject Lands for Residential Use	9
2.6 Infrastructure and Investment in Kilrush	10
2.7 2.7 Suitability and Assessment of the Subject Lands	10
3. CONCLUSION	12
TABLE OF TABLES	
<i>Table 1: Current and Proposed Land Use Zonings of the subject site.....</i>	<i>6</i>
<i>Table 2: Settlement Capacity Audit of subject lands.....</i>	<i>10</i>
TABLE OF FIGURES	
<i>Figure 1: Indicative Site Location Map prepared by MKO. Subject site shown in red.....</i>	<i>4</i>
<i>Figure 2: Detailed indicative Site Location Map prepared by MKO. Subject site shown in red.....</i>	<i>4</i>
<i>Figure 3: Rezoning Map of Subject Site, prepared by MKO.....</i>	<i>5</i>
<i>Figure 4: Extract from the Clare County Development Plan 2023 - 2029 Kilrush Map. Indicative lands marked with a black star.....</i>	<i>5</i>
<i>Figure 5: Previous Residential zoning on site. Kilrush Map Clare County Council Development Plan 2017-2023. Indicative subject site shown with black star.....</i>	<i>7</i>
<i>Figure 6: Site Constraints Map prepared by MKO.....</i>	<i>9</i>

Appendix 1 - Planning Policy Context

Appendix 2 - Land Map Folio Number CE46444F

EXECUTIVE SUMMARY

On behalf of our client Mr Gary Egan (landowner), MKO wishes to make this submission to request the rezoning of lands from existing zoning of 'Agriculture' to proposed zoning of 'Residential' as part of the proposed Variation No. 1 of the *Clare County Development Plan 2023-2029* (CCDP). The subject site is located in the townland of Leadmore East, Kilrush, Co. Clare. This submission sets out justification as to why the subject site is appropriate for rezoning for residential use.

This submission has been prepared by MKO of Tuam Road, Galway, H91 VW84, on behalf of our client Mr Gary Egan (the landowner).

- This submission requests for the subject site located in Leadmore East, Kilrush, Co. Clare, shown in Figure 1 below, to be rezoned from the current 'Agriculture' zoning to the proposed 'Residential' zoning. This submission is made to *Variation No.1 to the Clare County Development Plan 2023-2029*
- The subject site is located within the Kilrush Settlement Boundary.
- The NPF Implementation Plan published in July 2025 notes that the new Annual Housing Growth Requirement to 2034 for Clare County Council (CCC) has been set at c. 985 units, which is an increase from the adopted development plan Annual Housing Requirement of 960 units.
- Further to this the new Housing Growth Requirement from 2035 to 2040 for County Clare include an additional 687 units to meet projected demand.
- The subject site was previously zoned as 'Residential' within the previous *Clare County Development Plan 2017-2023*, establishing that residential use on the site has been previously deemed as an appropriate zoning.
- The site is located in an area of existing residential developments and therefore is in keeping with the character of the surrounding area and would be considered appropriate for residential development in principle, if the site was rezoned as 'Residential'.
- There is a previous grant of planning permission on the subject site for the development of 19 no. dwellinghouses establishing that residential use was acceptable in principle on the site. (Planning Reference 09/31019).
- The subject site meets the criteria set out by Clare County Council during the Call for sites in December 2025 regarding the appropriate lands for rezoning.

1.

INTRODUCTION

We note that Clare County Council has prepared a proposed Variation No. 1 of the extant *Clare County Development Plan 2023-2029* (CCDP) to vary the plan following the recent publication of the [National Planning Framework's First Revision 2025](#) and the [Guidelines on NPF Implementation - Housing Growth Requirements](#) published under Section 28 of the *Planning and Development Act 2000 (as amended)*. Variation No.1 of the *Clare County Development Plan 2023-2029* aims to ensure that there is a plan-led, co-ordinated approach to housing delivery that aligns with national policy, supports the ongoing response to the housing crisis and to ensure consistency with updated national planning policy and Section 28 Ministerial Guidelines.

MKO have been appointed by our client, Gary Egan, to prepare this submission regarding the subject site located in the townland of Leadmore East, Kilrush, County Clare, as shown in Error! Reference source not found. to be rezoned from the current zoning 'Agriculture' to the proposed zoning 'Residential'. **Appendix 2** of this report includes a copy of the Folio Map for the lands, Folio Number CE46444F.

The NPF Implementation: Housing Growth Requirements Guidelines sets out the housing demand scenario to 2040 for each local authority based on ESRI modelling of population growth, structural housing demand and assumptions relating to unmet demand. The Guidelines also outline that Planning Authorities should address the scope for additional provision of up to 50% over and above the housing growth requirement as outlined below:

Policy and Objective 2:

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.

The new annual housing growth requirement for Clare County is 985 units per annum up to the year 2034, which is an increase of 25 units per year.

Public consultation on Proposed Variation No.1 to *Clare County Development Plan 2023-2029* is open from Friday 6th of March to Tuesday 7th April 2026. This submission is duly made on the Proposed Variation No.1 prior to the closing date.

An overview of the relevant National and Local Planning Policy is provided in **Appendix 1** of this report.

1.1

Site Location

The subject site is located along the N67 Fahy's Road approximately 900 metres northwest of Kilrush town, within the townland of Leadmore East. **Figure 1 and Figure 2** provide the indicative location of the site within the context of Kilrush Town, with the indicative lands delineated with a red boundary.

The subject site is located within the Kilrush settlement boundary. The lands directly adjacent to the site are zoned Existing Residential and Open Space in the *Clare County Development Plan 2023-2029* (CCDP).

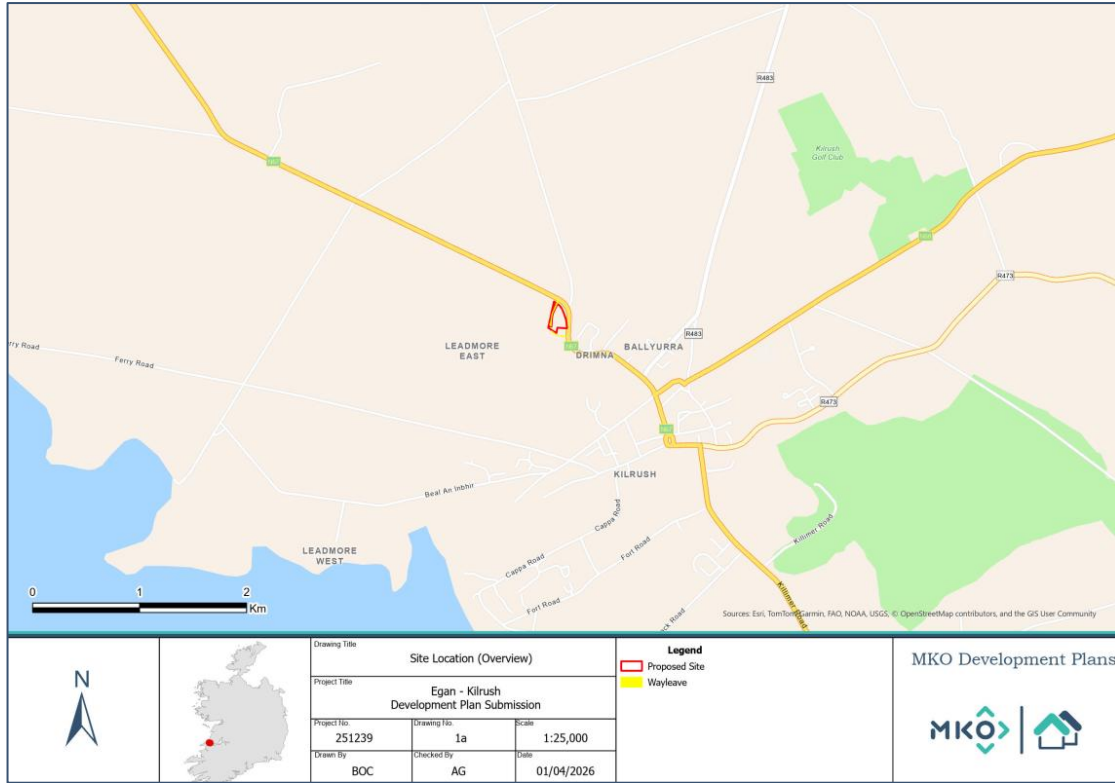


Figure 1: Indicative Site Location Map prepared by MKO. Subject site shown in red.

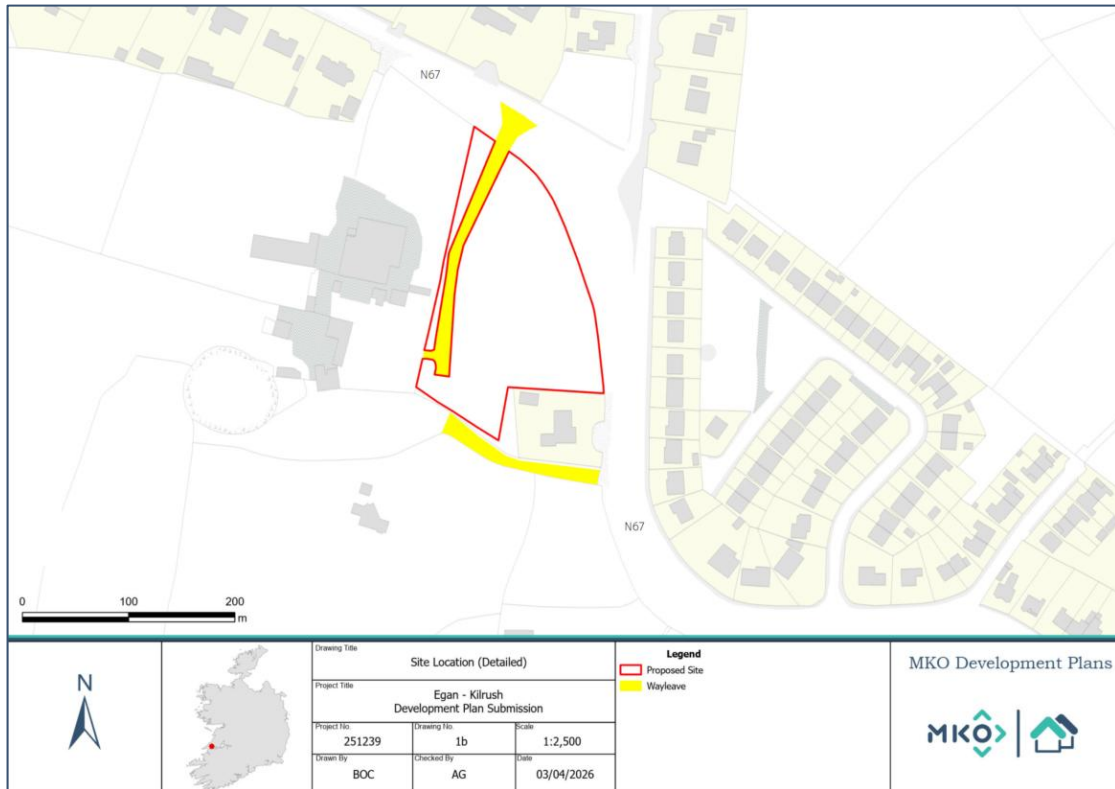


Figure 2: Detailed indicative Site Location Map prepared by MKO. Subject site shown in red.

1.2

Proposed Zoning

The subject site is located within the Kilrush settlement boundary, on lands currently zoned ‘Agriculture’ under the current CCDP. **Figure 3** below shows the current land use zoning ‘Agriculture’ on the left and the proposed zoning ‘Residential’ on the right. **Figure 4** shows the indicative lands located within the Kilrush settlement boundary.



Figure 3: Rezoning Map of Subject Site, prepared by MKO.



Figure 4: Extract from the Clare County Development Plan 2023 - 2029 Kilrush Map. Indicative lands marked with a black star.

Table 1 below outlines the current land use zoning type of ‘*Agriculture*’ for the subject site and the objectives of the proposed ‘*Residential*’ land use zoning.

Table 1: Current and Proposed Land Use Zonings of the subject site.

Current Land Use Zoning	Objective
Agriculture	<p>This zone is for the use of land for agricultural purposes and farming-related activities and to preserve the amenity of the town or village setting. Individual dwellings for permanent occupancy of established landowners (i.e. within family ownership for the preceding 10 years) and their immediate family members will be open for consideration subject to normal site suitability considerations.</p> <p>Immediate family members would include:</p> <ul style="list-style-type: none"> • Parents • Children • Siblings
Proposed Zoning: Residential	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 and open spaces

The key items we wish to raise in this submission are as follows:

1. Suitability of the subject lands for residential development.
2. The Criteria for rezoning as set out by Clare County Council.
3. The subject site previous zoning as well as the established principle of development on site.

2. RATIONALE FOR REZONING

The subject site is located within the Kiltrush Settlement Boundary. The site is located in an area of existing residential developments and therefore is in keeping with the character of the surrounding area and would be considered appropriate for residential development in principle, if the site was rezoned from the current zoning of ‘Agriculture’ to proposed zoning of ‘Residential’.

2.1 Item 1: Housing Targets and Requirements for Rezoning of New Residential Land

Following the adoption of the Revised NPF and the publication of the Section 28 Guidelines (2025) on the *NPF Implementation: Housing Growth Requirements*, Clare County Council is required to review and vary its Development Plan to update the Housing Allocation for the period up to 2034 in line with Policy and Objective 1 of the Guidelines (2025). This subsequently results in the requirement to identify additional lands that would be suitable to residential zoning. The Guidelines (2025) also notes that planning authorities should address the scope for additional provision of up to 50% in excess of the baseline housing growth requirement.

The NPF Implementation Plan published in July 2025 sets out the housing growth requirements. The plan notes that the new Annual Housing Growth Requirement to 2034 for Clare County Council has been set at c. 985 units, which is an increase from the adopted development plan Annual Housing Requirement of 960 units. This represents an increase of **an additional 25 residential units in the county** than what had been originally anticipated when the 2023-2029 plan was established. Further to this the new Housing Growth Requirement from 2035 to 2040 for County Clare include an additional 687 units to meet projected demand.

2.2 Item 2: Previous Zoning of Subject Site

The subject site was previously zoned as ‘Residential’ within the previous Clare County Development Plan 2017-2023, establishing that residential use on the site has been previously deemed as an appropriate zoning. Please see **Figure 5** below shows the previous ‘Residential’ zoning on site within the *Clare County Development Plan 2017-2023*.

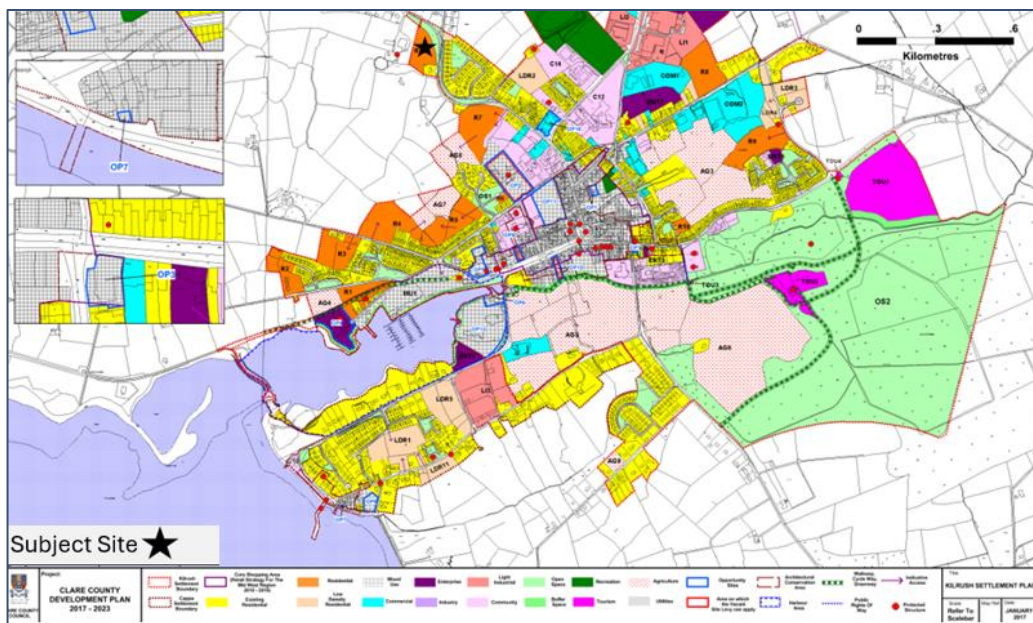


Figure 5: Previous Residential zoning on site. Kiltrush Map Clare County Council Development Plan 2017-2023. Indicative subject site shown with black star.

2.3 Item 3: Principle of Development

The subject site is located within the Kilrush settlement boundary. The site is located in an area of existing residential developments and therefore is in keeping with the character of the surrounding area and would be considered appropriate for residential land use zoning. As noted above, the site was previously zoned for residential use, and therefore the rezoning to residential and principle of development can be considered as acceptable in principle.

In addition to this, there is a previous grant of planning permission on the subject site (Planning Reference 09/31019) for the following development:

“Permission for development to construct 19 no. dwellinghouses, consisting of (i) 18 no. semi detached dwellinghouses and (ii) 1 no. detached dwellinghouse, together with associated site development works and connection to public services at Leadmore east, Kilrush, Co Clare”.

This grant of permission for 19 no. residential units also confirms that the principle of residential developments on site has been established and has been considered as acceptable in principle in the past.

Core Strategy

Table 3.1 of the CCDP sets out the Settlement Hierarchy for County Clare, which sets out the settlement typology for each settlement. Kilrush is identified as a Service Town along with Cappa to the south of the town.

Table 3.4 of the CCDP sets out the ‘Core Strategy Table’ which identified that in 2016 Kilrush had a population of 2,489 persons, with the population target estimated to increase to 2,975 by 2029. The 2022 census data shows an increase in the population of Kilrush to 2,649 persons representing an increase of 160 persons. This increase in population will directly increase the need for additional housing units in Kilrush.

2.4 Item 4: Criteria for Re Zoning

As part of the initial call for sites in December 2025 Clare County Council had set out a number of criteria in relation to the rezoning of lands within towns and villages. In our opinion the site which is subject of this submission meets the criteria set out by the local authority and is appropriate for rezoning.

The criteria and our response to each are set out below;

- a. *align with the strategic objectives for growth as set out in the Clare County Development Plan 2023-2029*

Response: The rezoning of the subject site to from the current zoning of ‘Agriculture’ to the proposed zoning of ‘Residential’ would align with the strategic objectives for growth as set out in the Clare County Development Plan 2023-2029.

- b. *are serviced, due to be serviced or serviceable over the remaining life of the Clare County Development Plan i.e. 2026-2029, or in the long term 2029-2039*

Response: The subject lands are within the Kilrush settlement boundary, are adjacent to existing residential developments can be considered as serviceable over the remaining life of the Clare County Development Plan i.e. 2026-2029, or in the long term 2029-2039.

- c. *would contribute to sustainable, compact and sequential patterns of growth*

Response: The subject lands are located adjacent to existing residential developments within the settlement boundary and would be considered to constitute sequential patterns of growth in order to achieve compact growth.

- d. *would support the development of infill housing, housing on brownfield land or address vacancy and dereliction.*

Response: The subject site is on greenfield lands. Clare County Council have invited the public to put forward suggestions for lands in December 2025 and noted “that are suitable for zoning for residential use (**greenfield** and brownfield/infill/regeneration sites)” including greenfield sites.

- e. *are located in towns and villages with good social infrastructure and capacity in schools and community facilities.*

Response: The CCDP notes Kilrush has a significant green infrastructure network connected by walking trails and connecting town amenities. Kilrush marina is a significant tourism and leisure resource situated within walking distance of the vibrant town centre.

2.5

Item 5: Suitability of the Subject Lands for Residential Use

The subject site is an appropriate location for new residential development, particularly given its location in close proximity to an established residential area and key transport routes. The CCDP Strategic Flood Risk Assessment (SFRA) indicated that the subject land is located outside any flood zones and has not previously been flooded. There are no cultural heritage or ecological designations directly on the subject land, including no Recorded Monuments or Protected Structures.

It is evident that the lands are not physically constrained and therefore, there is an opportunity to successfully deliver residential development subject to proper planning and sustainable development (See **Figure 6** showing the Site Constraints Map).

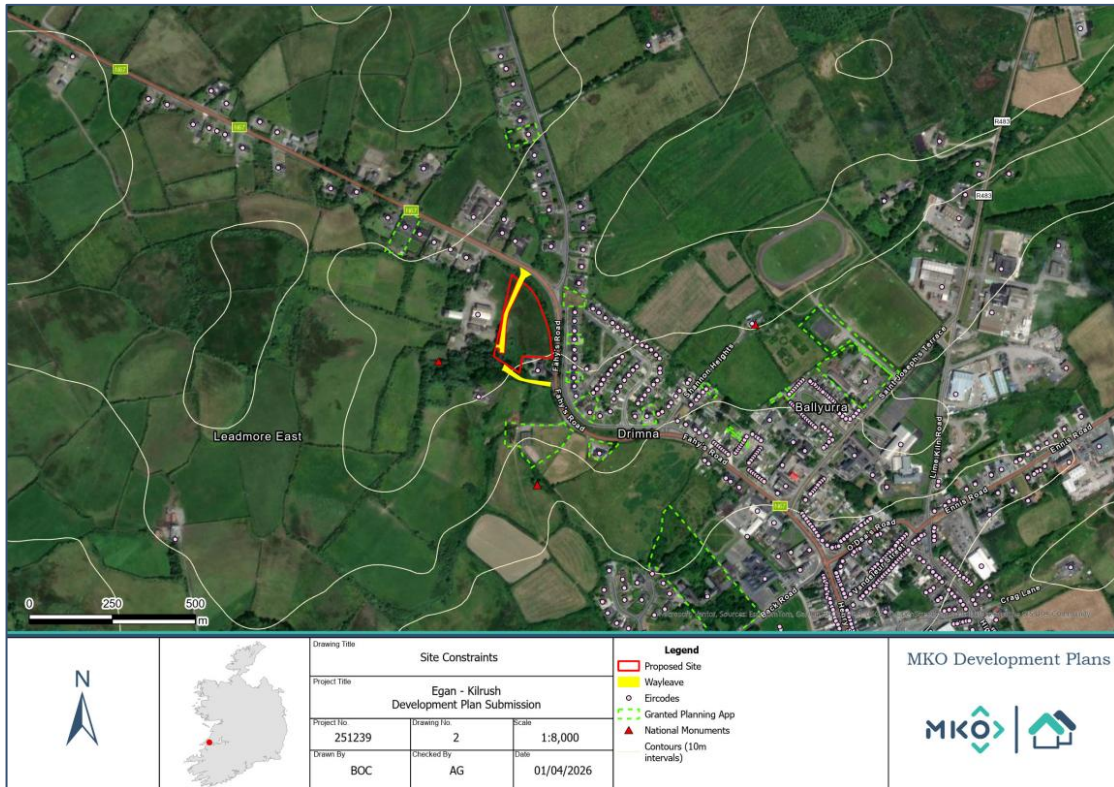


Figure 6: Site Constraints Map prepared by MKO.

2.6

Infrastructure and Investment in Kilrush

Infrastructure

Wastewater: According to the Uisce Éireann website, Uisce Éireann have completed the Kilrush Sewerage Scheme Wastewater Project. The project was completed in 2024 and involved the following;

- “construction of a new wastewater treatment plant (WWTP) that will serve a population equivalent of over 7,500.
- Upgrade of the existing Frances Street pumping station including pumps, mechanical plant, and a storm water storage tank.
- Sewer pipelines to bring untreated wastewater to the WWTP and treated water to the existing outfall tidal tank at Skagh Point.
- The existing outfall pipe will safely discharge the treated wastewater to the lower Shannon Estuary.”

Water: According to Uisce Eireann 10-Year Water Supply Capacity Register for Clare, Kilrush is located within the West Clare Water Resource Zone (WRZ) where it is identified that capacity is available to support 2034 population target.

Investment

Volume 3d of the CCDP notes that Council successfully secured €3.5million through the Rural Regeneration and Development Fund, and €1.78 million through the Enterprise Ireland Regional Enterprise Development Fund, to establish a Maritime Training Centre in Kilrush. This will be a key economic driver for the town.

In addition to this, the ESB plans to establish a green energy hub, known as ‘Green Atlantic @ Moneypoint’ which seeks to shift Ireland’s primarily coal-burning plant into a renewable energy hub, helping Ireland to become a leader in green energy production. Green Atlantic @ Moneypoint is a multi-billion Euro programme with significant investment on the site over the next decade and will have the capacity to power 1.6 million homes.

2.7

2.7 Suitability and Assessment of the Subject Lands

This submission contends that the subject lands have the ability to deliver new residential development in the coming years. The *Development Plan Guidelines for Planning Authorities (2022)* sets out criteria for conducting a ‘Settlement Capacity Audit’ which provides an evidence-based assessment of the subject lands. **Table 2** provides an assessment of the subject lands against these criteria.

Table 2: Settlement Capacity Audit of subject lands.

Settlement Capacity Audit	Subject Lands
Road Access	<ul style="list-style-type: none"> • The subject site is located within the Kilrush settlement boundary. • There is access from the site to the N67 Fahy’s Road through a right of way. • Any future planning application would be appropriately supported by a Traffic and Transport Assessment and a Road Safety Audit.
Water Supply and Infrastructure	<ul style="list-style-type: none"> • As noted in Section 2.6 above Uisce Eireann have completed the Kilrush Sewerage Scheme Wastewater Project.

	<ul style="list-style-type: none"> • Kilrush is located within the West Clare Water Resource Zone (WRZ) where it is identified that capacity is available to support 2034 population target.
<p>Social Infrastructure</p>	<ul style="list-style-type: none"> • The subject lands are approximately 900 metres from Kilrush town. • Kilrush serves as the main retail, and service centre to for the town and the wider community in West Clare. • Kilrush has a strong green infrastructure network of walking trails for community use. • Kilrush Community Hospital, Kilrush Physiotherapy and Sports Injury Clinic are located south of the subject site. • There are a variety of shops in Kilrush including Tesco and Supervalu. • Kilrush Community School, St Senans Primary School and Gaelscoil Ui Choimin are located approximately 900 metres from the subject site. • Kilrush marina is located approximately 2 kilometres from the subject site.

3.

CONCLUSION

This submission has been prepared by MKO on behalf of Mr Gary Egan for the Proposed Variation No.1 of the *Clare County Development Plan 2023-2029* for the subject site located in the townland of Leadmore East Kilrush, Co. Clare. This submission has set out justification for the subject site to be rezoned from the current '*Agriculture*' zoning to '*Residential*' zoning.

The subject site was previously zoned as '*Residential*' within the previous Clare County Development Plan 2017-2023, establishing that residential use on the site has been previously deemed as an appropriate zoning. Further to this, the site is located in an area of existing residential developments and therefore is in keeping with the character of the surrounding area and would be considered appropriate for residential development in principle. The principle of residential development has also been previously established on the site with a grant of planning permission for the development of 19 no. dwellings (PL Ref 09/31019). Given the site planning history, it is submitted that it would be appropriate for the subject lands to be zoned for residential use.

In our professional opinion, rezoning the subject site from '*Agriculture*' to '*Residential*' should be supported as it would facilitate the delivery of residential development in a highly accessible location and directly contribute to meeting the housing targets set out the *Clare County Development Plan 2023-2029*.

APPENDIX 1 - PLANNING POLICY CONTEXT

Project Ireland 2040: Revised National Planning Framework

The Department of Housing, Planning, Community and Local Government published the National Planning Framework in 2018 (NPF) entitled 'Project Ireland 2040' to succeed the National Spatial Strategy (NSS). The NPF is a high-level document which provides a framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy.

The first revision seeks to update the NPF to reflect changes to the government policy that have taken place since the first publication six years ago. The First Revision of the National Planning Framework (NPF) was published in April 2025.

The Revised NPF, amongst other important updates, *reflects the urgent need to accelerate housing delivery further intensified by an increase in the Population targets*, which is projected to grow to 5.7 million by 2030 and 6.1 million by 2040, up from the original 5.8 million (to 2040). This is because of a rapid population growth of 5.15 million recorded during Census 2022, which was a 9% increase since 2016. As a result, the Revised NPF sets out a national goal of 50,000 homes per annum to 2040, reinforcing the need to prioritise the delivery of homes at locations that can support sustainable development in the following National Policy Objectives:

National Policy Objective 32: To target the delivery of 550,000 additional households to 2040.

National Policy Objective 33: Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. [our emphasis]

This is supported by the high-level principles, with increased emphasis on compact growth and sustainable communities in both brownfield and greenfield locations, to accommodate this increased population.

National Strategic Outcome (NSO) 1 on Compact Growth outlines the importance of the coordinated development of urban areas to create more attractive spaces to live and work in. Housing is a core part of this NSO, promoting residential development within existing built-up areas. The importance of housing is further reflected in Strategic Investment Priority 1: Housing and Sustainable Urban Development.

NPF Implementation: Housing Growth Requirements

Following on from the publication of the First Revision to the NPF, the Department of Housing, Local Government and Heritage (DHLGH) published the *National Planning Framework Implementation: Housing Growth Requirements (2025)* in July 2025 which is the Section 28 Ministerial Guidelines and is based on updated research and modelling on population growth and structural housing demand presented by the ESRI. This Section 28 Guidelines replaces the Housing Supply Target Methodology, Guidelines for Planning Authorities, published in December 2020.

The Guidelines sets 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. The housing growth requirements therefore incorporates a calculation for unmet demand and unmet need. In that regard, **it is highlighted that the new Annual Housing Growth Requirement to 2034 for Clare County Council has been set at c.985 units, which is an increase of 25 units from the adopted development plan Annual Housing Requirement of 960 units.**

To account for the revised housing growth requirements, the Government has directed planning authorities to commence the process of revising and varying their development plans, to reflect the new annual housing growth requirements as outlined in the following policy and objective:

Policy and Objective 1:

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. [our emphasis]

In the 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 notes that planning authorities should address the scope for **additional provision of up to 50% over and above the housing growth requirement for each local authority**. This is outlined in the following policy and objective:

Policy and Objective 2:

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. [our emphasis]

It is noted that the additional provision of up to 50% in this Guideline is above the 25% additional provision for housing targets, previously outlined in the Housing Supply Target Methodology for Development Planning (2020). ‘Additional provision’, as per the Guidelines, recognises the fact that, for a variety of reasons, **a relatively significant portion of zoned lands are not activated over the period of a development plan**. This process will involve consideration of the potential need to identify additional lands suitable for residential zoning, in addition to the need to develop infill housing, housing on brownfield lands and address vacancy and dereliction.

The provisions of Policy and Objectives 1 and 2 will require planning authorities to reconsider how to address zoning and phasing over a 12 year plus period. This will be done through the undertaking of a Settlement Capacity Audit. In that regard, the Guidelines notes the following:

Notwithstanding that the recommended quantum of ‘additional provision’ over and above the baseline housing growth requirements set out in these Guidelines is up to 50%, the justification for this additionality and the criteria for the selection of land and sites should be carried out in accordance with the existing provisions of the “Development Plans - Guidelines for Planning Authorities” (2022), as set out in Section 4.4.3 thereof - “Ensuring Sufficient Provision of Housing Lands/Sites”. [our emphasis]

Development Plans: Guidelines for Planning Authorities

The Development Plan: Guidelines for Planning Authorities (2022) are the Section 28 Guidelines on the preparation, making variation and implementation of development plans. These Guidelines (2022) outline the Sequential Approach to Zoning required under the NPF.

The Sequential Approach to Zoning is a key factor in sustainable development. It contributes to compact growth and thus reducing urban sprawl and car dependency and ensures the best use of existing infrastructure in urban areas. Sequential development can avoid the decline of urban centres by avoiding

the development of lands far from the centre over undeveloped or vacant brownfield sites closer to the centre. These principles are summarised in the following Policy Objective:

It is a policy and objective of these Guidelines that planning authorities 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. [our emphasis]

The Guidelines state that “Proposals to facilitate housing development through zoning must be grounded in the knowledge that appropriate services **are/will be available to enable development** within the plan period in order for the core strategy to be realisable in practice.”

Regional Spatial and Economic Strategy for the Southern Region 2019-2031

The Regional Spatial & Economic Strategy (RSES) for the Southern Regional Assembly was adopted in January 2020. Its principal purpose is to support the implementation of the National Planning Framework (NPF) and national economic policies by providing a long-term strategic framework for balanced regional development. County Clare, forming part of the Mid-West Strategic Planning Area, is a key focus of the RSES. Ennis is designated as a Key Town, with strategic importance in driving regional growth. The RSES emphasises the importance improving the quality of life of cities, towns and rural areas – particularly in the context of housing and infrastructure – as a way to support compact growth, strengthen rural economies and communities and create strong economies, all of which aligned with the National Strategic Outcomes set out in the Revised NPF.

The RSES aims to deliver this by promoting residential development and investment within the footprint of existing towns and villages as identified in RPO 26:

“RPO 26 Towns and Villages: It is an objective:

e. To support the development of guidelines for cluster housing development within the existing footprint of our rural settlements

g. To seek investment in the sustainable development of a “New Homes in Small Towns and Villages” initiative in the Region and the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create “build your own home” opportunities within the existing footprint of rural settlements. Local authorities identify and prioritise the provision and implementation of serviced sites within towns and villages as an objective of development plans. These programmes shall ensure a sustainable and appropriate spread of development between towns and villages within their areas.”

Sustainable Residential Development and Compact Settlement Guidelines 2024

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* constitute Ministerial Guidelines under Section 28 of the *Planning and Development Act 2000* (as amended). These Guidelines replace the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* issued as Ministerial guidelines under Section 28 of the Act in 2009. There is a renewed focus in the 2024 Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

Chapter 3 focuses on ‘Settlement, Place and Density’ which states that there is “*even greater urgency now in respect of the need for more diverse and affordable housing to meet the needs of a growing and more diverse population and for settlement*”.

Section 3.3.4 Small and Medium Sized Town (1,500 – 5,000 population) sets out key priorities for compact growth which includes the following; “*deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.*”

Clare County Development Plan 2023 – 2029

The current statutory planning policy document for the subject site is the Clare County Development Plan (CCDP) 2023-2029, which was adopted by Elected Members of Clare County Council on the 9th March 2023, and came into effect on 20th April 2023.

The Plan provides the framework for sustainable development across the county and promotes balanced growth by supporting economic development while protecting the unique rural character and natural environment of Clare. Emphasis is placed on fostering vibrant rural communities through the promotion of local employment opportunities and sustainable infrastructure. To accommodate population growth and enhance the local economy, the plan encourages development that strengthens key towns and rural areas without contributing to urban sprawl.

Section 3.4.2 of the plan sets out the Core Strategy Statement which priorities the development and strengthening of 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 through the provision of sustainable tiered approach to residential development and ensuring sufficient lands is allocated to ensure unmet demand is addressed as stated in CDP 3.2:

“It is an objective of Clare County Council: To ensure that sufficient land continues to be available to satisfy the housing requirement of the County over the lifetime of the plan.”

Volume 3d *The West Clare Municipal District Settlement Plan*, which is found within Clare County Development Plan 2023-2029 (CCDP) identifies Kilrush as a **Service Town**. Kilrush been designated as a service town, due to its role as important service centres in their respective Municipal Districts and due to their role as drivers of growth for their surrounding hinterlands. It is also noted in the CCDP that Kilrush is well served by National (N67 and N68), Regional (R483 and R473) roads and local routes which link the town to the Key Town of Ennis and the Mid West Region. Section 4.2.3 of the CCDP outlines the key policies for Service Town stating;

“CDP 4.5 It is an objective of Clare County Council:

a) To ensure that the Service Towns are individual drivers of growth and prosperity for their respective catchments, by consolidating their administrative, retail and service bases, protecting and enhancing their distinctive town centre characteristics and natural landscape settings, and maximising their role for sub-regional growth;

b) To work with the relevant bodies and to seek investment for the timely and sustainable delivery of holistic infrastructures, to enhance the levels of amenity and design quality, and to regenerate and rejuvenate the Service Towns throughout the County; and

c) To monitor the cumulative effect of grants of planning permission on available wastewater capacity, where connection to a public wastewater treatment plant is included as part of a development proposal.”

“To ensure that Kilrush town, Cappa village 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.”



APPENDIX 2 - FOLIO MAP FOR THE LANDS, FOLIO NUMBER CE46444F

