

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029
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[Outlook-5ab5jvza.png](#)
[Doonbeg-Comerford-Proposed Variation to Development Plan Submission - April 2026.pdf](#)
Importance: High

Dear Sir/Madam,

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission in response to Proposed Variation No. 1 of the Clare County Development Plan 2023-2029 on the foot of the Section 28 Ministerial Guidelines to local authorities in respect of the requirement to increase zoned land provision for housing.

This submission is made on behalf of our client, Mr. George Comerford, in relation to the zoning objective of his lands at Main Street, Doonbeg, Co. Clare. Our client [REDACTED] owns lands on the northern side and southern side of Main Street (please refer to Fig. 1). In the current Clare County Development Plan, The lands to the north are partly zoned Mixed Use (MU2) and the remainder of the northern lands are not currently zoned. The lands to the south are zoned Mixed Use (MU1) and Tourism (TOU2).

In this regard, please find attached a formal report/submission on behalf of our client. Please confirm receipt of same and address all correspondence on this matter to DOWNEY, 29 Merrion Square, Dublin 2.

Kind regards,
Donal

Donal Duffy MIPI
Director

[REDACTED]
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29 Merrion Square, D02RW64



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D O W N E Y

SUBMISSION TO VARIATION NO. 1 OF

THE CLARE COUNTY DEVELOPMENT PLAN
2023-2029

Lands at Main Street, Doonbeg, Co. Clare

Client: Mr. George Comerford

April 2026

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Downey Planning Document Control			
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Prepared by	Donal Duffy MIPI Director	07/04/2026	V1_DRAFT
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1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission in response to Proposed Variation No. 1 of the Clare County Development Plan 2023-2029 on the foot of the Section 28 Ministerial Guidelines to local authorities in respect of the requirement to increase zoned land provision for housing.

This submission is made on behalf of our client, Mr. George Comerford, in relation to the zoning objective of his lands at Main Street, Doonbeg, Co. Clare. Our client owns [REDACTED] and also owns lands on the northern side and southern side of Main Street (please refer to Fig. 1). In the current Clare County Development Plan, The lands to the north are partly zoned Mixed Use (MU2) and the remainder of the northern lands are not currently zoned. The lands to the south are zoned Mixed Use (MU1) and Tourism (TOU2).

Our client welcomes that Clare County Council are reviewing the current Development Plan and is broadly supportive of the Proposed Variation No. 1. However, it is considered that more appropriate uses could be developed on the subject lands and it is submitted that the lands be rezoned from Tourism to Residential as part of Variation No. 1. This submission shall set out the grounds of this rezoning proposal.

2.0 SITE DESCRIPTION

The lands are located in the centre of Doonbeg, Co. Clare. Doonbeg is designated as a Tier 1 Large Village under the County Development Plan. The lands to the south comprise 2 no. buildings that front onto Main Street and then undeveloped lands to the rear, which extend as far back as the L2030 road. The undeveloped part of the site measures approximately 2.4 hectares and contains both Mixed Use (0.9 hectares) and Tourism (1.5 hectares) Zonings.

The lands to the north extend to a total of 9.71 hectares. Of this, approximately 2.7 hectares is zoned as Mixed Use and the remainder of the lands (c. 7 hectares) is unzoned.



Figure 1. Aerial View of the Application Site (approximate boundaries of the subject site filled in red and ownership in blue)

3.0 PLANNING HISTORY

DOWNEY have carried out a detailed examination of the planning history of the subject lands. There was 1 planning application pertaining to the lands to the south of Main Street, which shall be outlined below:

Reg. Ref. 08/245 – By Order dated 10th November 2008, the Planning Authority refused permission to Graigue Properties Ltd., for a development comprising the demolition of 3 no. existing properties on Main Street and the construction of 53 no. dwellings. The permission was primarily refused due to design issues and the demolition of existing buildings on Main Street.

4.0 JUSTIFICATION & GROUNDS OF SUBMISSION

As noted previously, our client owns a landbank on the southern side of Main Street, and another bank of land on the northern side of Main Street in Doonbeg (please refer to Fig. 1 above). Our client is in the house building industry and would seek to develop the lands in the future, subject to the necessary zoning and planning permission being obtained. However, under the current land use zonings, Tourism does not permit permanent housing to be granted permission, while there may be a limitation as to residential led developments on Mixed Use Zones.

This submission is proposing that Variation No. 1 be amended to facilitate the rezoning of our client's land at Main Street, Doonbeg, Co. Clare from 'TOU 2' – Tourism and 'MU 1' and 'MU 2' – Mixed Use to '**Residential Use**'.

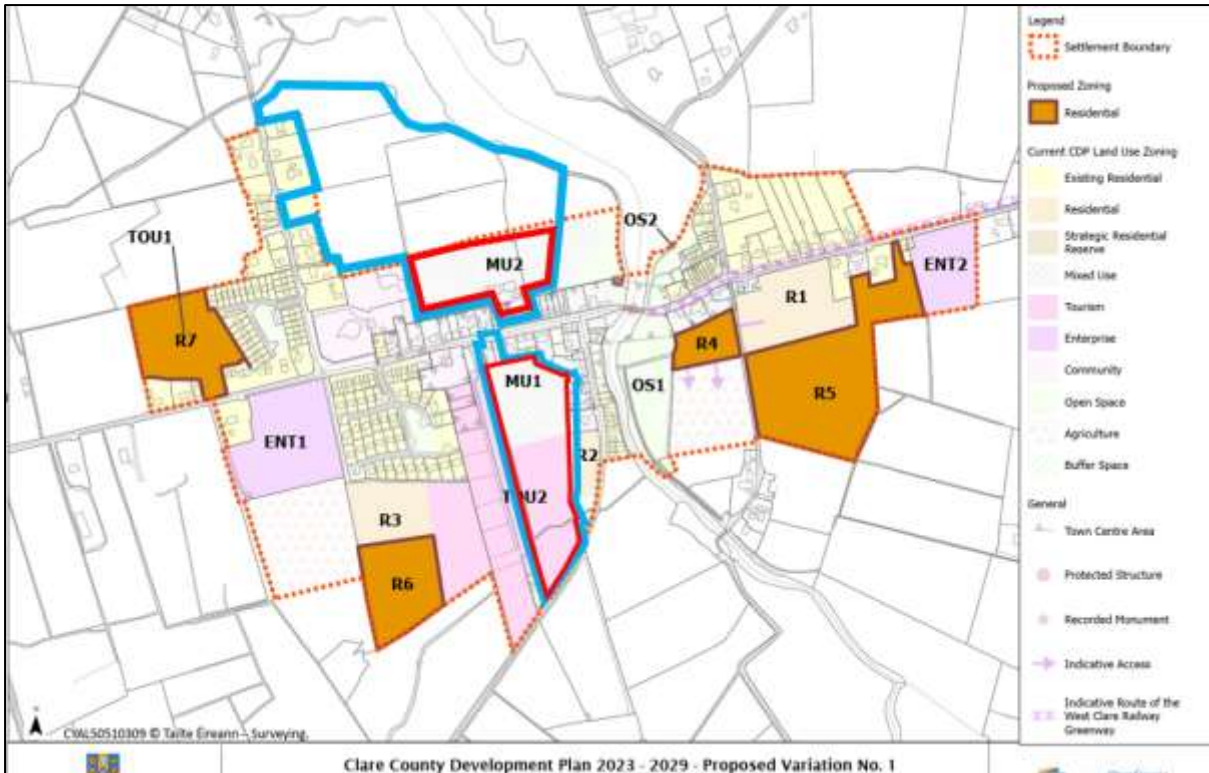


Figure 2. Proposed Variation No. 1 Zoning Map (lands outlined in red and blue)

Having set out the ground of this submission, the justification for the proposed rezoning shall be set out below.

Compact Growth

It is important to note that the lands are located centrally in the heart of the village of Doonbeg and therefore the provision of housing on these lands is fully consistent with the principal of compact growth and the Sustainable Residential and Compact Settlement Guidelines for Planning Authorities (2024).

The current Tourism zoning will not be developed, noting that our client (the landowner) is not in the tourism business and has no intention of delivering tourist accommodation on the lands. Furthermore, there is sufficient lands in the village that are zoned and capable of accommodating tourism spaces, including at the adjoining caravan park to the west. However, our client would be in a position to submit a planning application for a residential development and to deliver such a scheme, subject to the necessary consents being obtained. This could deliver approximately 30 homes for Doonbeg and assist the Planning Authority in meeting their revised housing targets as set out under the updated Core Strategy.

Serviced Land

DOWNEY have carried out a review of Uisce Eireann’s Wastewater and potable Water Capacity Register and confirm that there is capacity in the Doonbeg plant for some additional housing. We would also highlight that further upgrades to the plant are planned by Uisce Eireann. Therefore, the lands are serviced by the necessary Uisce Eireann infrastructure.

There is also a footpath and public lighting at the front of the site and as it is located within the centre of the village, it is within walking distance of local shops and facilities.

Environmental Considerations

The lands are not affected by any significant environmental, ecological or archaeological constraints, as confirmed by the composite zoning map below. The infrastructure to serve the housing on the lands is already in place from an earlier permission. There is no flood risk associated with the lands subject to this submission either. Thus, subject to being zoned and planning permission being granted, they are ready for the delivery of housing.

5.0 PLANNING CONTEXT

5.1 Project Ireland 2040: National Planning Framework First Revision (2025)

The National Planning Framework (NPF) is *“the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040”*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the NPF to deliver *“at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.”*

The NPF states that, *“the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, villages and rural areas good places to live now and in the future.”* The NPF acknowledges the unique and complex nature of urban structure and suggests accordingly the need for a range of complementary strategies in the context of planning for future growth.

The policy document continues that settlements require a combination of employment, infrastructure and residential growth, and all will require a tailored approach that can be appropriately linked to investment. The NPF sets out the following key requirements:

5.2 Delivering Homes, Building Communities 2025-2030

Published on 13th November 2025, the Government has introduced a new housing plan to replace Housing for All. The new plan “Delivering Homes, Building Communities”, aims to speed up the delivery of new homes and tackle homelessness, building on the progress of the Housing for All plan. The Plan aims to deliver 300,000 new homes by the end of 2030, which includes 72,000 social homes and 90,000 affordable housing supports. The Plan is also backed by an unprecedented investment in water, energy, and transport infrastructure to assist in the delivery of these houses, with a total of €9 billion capital funding for housing in 2026 alone.

The Plan is based on two key pillars:

1. Activating the supply of 300,000 more homes; and
2. Supporting people to have a home of their own.

Pillar 1 *“will be achieved through activating more land, providing more housing-related infrastructure, securing more development finance for home building, addressing viability challenges particularly those seen in apartment delivery, increasing the adoption of Modern Methods of Construction, increasing the skills in the residential construction sector and working toward ending dereliction and vacancy.”*

The Plan also identifies four key priorities to activate Pillar 1, which are as below:

1. Ensure a strong pipeline of zoned and serviced land is available.
2. Create the conditions to attract the required investment.
3. Increase skills and support the adoption of Modern Methods of Construction in the residential construction sector.
4. Work toward ending dereliction and vacancy.

With regards to Pillar 2, the Plan *“details how Government will support people. It sets out a series of key actions that work towards ending homelessness, support affordability and address the housing needs of people as they progress through life. In partnership with local authorities, the LDA and AHBs, the Plan will address the needs of the most vulnerable in our communities, make buying and renting homes more affordable and support the development of villages, towns and cities across the country.”*

The four key priorities to activate Pillar 2, are as follows:

1. Focus on ending homelessness, deliver homes for older people and support social inclusion.
2. Deliver an average of 12,000 new social homes every year over the lifetime of the Plan.
3. Promote affordable homeownership, protect renters and make buying and renting homes more affordable.
4. Invest in the built environment of towns, villages and cities across the country to enhance community well-being.

The Plan concludes noting that in order to achieve the objective set out, a *“joined-up, long-term national effort”* is required, noting that it is a shared responsibility to deliver on these targets.

While the Proposed Variation No. 1 of the Development Plan seeks to rezone lands, our client is seeking an amendment to the proposed Variation to include his lands at Main Street, Doonbeg so as to more fully reflect the objectives and housing delivery targets set out in *Delivering Homes, Building Communities 2025–2030*.

Such an extension would facilitate the increased supply of homes in a sustainable and planned manner through the acquisition and development of appropriately rezoned land. It would also provide essential housing to facilitate the growth of Doonbeg and West Clare.

6.0 CONCLUSION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission in response to Clare County Council publishing the proposed Variation No. 1 of the Clare County Development Plan 2023-2029, on foot of the Ministerial Guidelines to Local Authorities in respect to

the requirement to increase zoned land to provide for housing. This submission is made on behalf of our client, Mr. George Comerford, in relation to the zoning objective of the lands at Main Street, Doonbeg, Co. Clare.

Given the recent developments regarding the First Revisions of the National Planning Statement and the Letter to the Chief Executives of the Local Authorities and the Office of the Planning Regulator, it is a priority for City and County Councils to undertake reviews of their Development Plans and respond to the new national housing requirements. It is therefore assessed that the proposed rezoning of the subject lands would positively contribute to the Section 28 Ministerial Guidelines to achieve the new housing targets.

This submission is proposing that Variation No. 1 be amended to facilitate the rezoning of our client's land at Main Street, Doonbeg, Co. Clare from 'TOU 2' – Tourism and 'MU 1' and 'MU 2' – Mixed Use to **'Residential Use**.

The lands form a natural, logical extension to the village of Doonbeg and would support the principal of Compact Growth. Furthermore, there are no infrastructural or environmental impediments to the rezoning and subsequent future development of the lands for housing.

With this said, DOWNEY respectfully request that Clare County Council consider the grounds and justifications of this submission to have the lands at Doonbeg rezoned to *Residential*' by way of an amendment to the proposed Variation No. 1 of the Clare Development Plan 2023-2029.