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Date: 28<sup>th</sup> March 2022

RE: Draft Clare County Development Plan 2023-2029

SRA File Ref: 20/009

A Chara,

The Southern Regional Assembly (SRA) welcomes the opportunity to comment on the Draft Clare County Development Plan 2023-2029. This plan marks a significant step on the pathway to the transformative change identified in Project Ireland 2040. We acknowledge and commend the work that has been undertaken in the preparation of the Draft Plan and the alignment of its principles with the National Planning Framework (NPF), Regional Spatial Economic Strategy (RSES) and Limerick-Shannon Metropolitan Area Strategic Plan (LSMASP).

The Draft Plan provides a comprehensive basis for addressing the opportunities and challenges for Clare and the observations and recommendations set out in this submission are intended to assist and support the Plan in its final preparation stages through successful alignment with the RSES and National Policy Objectives. The submission addresses:

- A: Context & Legislation
- B: Regional Spatial and Economic Strategy (RSES)
- C: Regional Priorities for Clare
- D: Observations & Recommendations on the Draft Development Plan
- Conclusion
- Appendix 1: List of Recommendations

## A CONTEXT & LEGISLATION

The SRA makes this submission in accordance with Section 27 B of the Planning and Development Act which states that the regional assembly “shall prepare submissions and observations”... on “whether, in the opinion of that assembly, the draft development plan and, in particular, its core strategy, are consistent with the regional spatial and economic strategy in force in the area of the development plan”.

To assist analysis key observations and recommendations are identified by number (and are appended to the submission) however the submission should be considered in its totality.

## B REGIONAL SPATIAL AND ECONOMIC STRATEGY (RSES)

The RSES came into effect on 31<sup>st</sup> January 2020 and seeks to make the Southern Region one of the most Liveable, Greenest, Creative and Innovative Regions in Europe based on 11 Strategy Statements, Regional Policy Objectives and MASP Policy Objectives.



Figure 1: Three Overarching Outcomes of the RSES aligned with 11 RSES Strategy Statements

## C REGIONAL PRIORITIES FOR CLARE

Key regional priorities for Clare include:

- The Limerick-Shannon Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region.
- Within the Limerick-Shannon Metropolitan Area:
  - Shannon as a significant regional strength and employment centre. Improve and enhance Shannon as an attractive residential location through placemaking and regeneration initiatives.
  - Shannon International Airport as a national and infrastructural driver of economic, social and tourism growth.
  - Supporting an application for the designation and subsequent development of the lands zoned as University in the Clare County Development Plan 2017-2023 as an Economic Strategic Development Zone (SDZ), subject to the provisions of the Planning Act and all environmental considerations.
  - Integrated transport and land use through the development of a Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS).
  - Realising opportunities for social and physical regeneration.
  - Metropolitan scale amenities through the provision of regional parks and blue green infrastructure.
  - Building economic resilience and addressing social disadvantage through enhanced human capital, lifelong learning and the enhancement of linkages between enterprise and Higher and Further Education.
  - Transitioning to a climate resilient society.
- Supporting Ennis as a self-sustaining regional economic driver and as a key location for investment and choice in the Region. Ennis is one of six Key Towns in the Region which are described by the RSES as self-sustaining regional drivers and have a comparable structure to the five regional growth centres identified in the NPF.
- Support and promote the delivery of the Strategic Development Locations as set out in the SIFP for the Shannon Estuary
- The potential network of North Kerry/ West Limerick/Shannon Estuary/Clare recognises the potential economic role of settlements including Listowel, Abbeyfeale Newcastle West (Key Town), Kilrush as economic drivers connected with the Shannon Estuary and Shannon Foynes Port.
- The potential network of Galway-Ennis-Shannon-Limerick Economic recognises the potential collaboration of Key Towns and Metropolitan Areas that share assets on the Atlantic Economic Corridor.
- The RSES also identifies the economic role played by smaller scaled settlements for their surrounding rural hinterlands and the opportunities for sharing assets and opportunities (see RPOs 28, 29 and 30) between different settlements to drive rural economic growth. The Clare Rural Development Strategy, which is recognised as an exemplar approach to rural development in the RSES, has also taken this approach. The SRA supports initiatives through the Development Plan to harness the potential of such networks.

- Compact growth and regeneration are cross-cutting themes for settlements of all sizes. The RSES and MASP seek a dynamic Development Plan approach to achieve Core Strategy growth targets.
- The Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary is cited as a good practice in the RSES. The RSES states that there are significant opportunities to grow the Blue Economy through offshore wave and wind renewable energy in the Shannon Estuary and the west coast of County Clare, reflecting the key natural assets of wave and wind energy, together with the presence of grid connections

## D OBSERVATIONS & RECOMMENDATIONS ON THE DRAFT DEVELOPMENT PLAN

### D1 Core Strategy

The key principles underlying the RSES spatial strategy are that:

- No place or community are left behind. In addition to cities and metropolitan areas as growth engines of scale, the RSES supports our strong network of towns, villages and rural areas.
- The need to supply an adequate supply of housing to meet existing and future demand.
- The need to invest in and deliver infrastructure to improve liveability and quality of life in urban and rural areas.
- The need for regeneration and delivering sustainable compact growth.
- The need to tackle legacy issues with equitable social, economic, recreational, cultural, environmental and physical infrastructure regeneration.

The RSES seeks a tailored approach to the achievement of NPF and RSES growth targets, with RPO 3 requiring that in preparing Core Strategies, Local Authorities shall determine a hierarchy of settlement and appropriate growth rates in accordance with guiding principles in Section 3.3 of the RSES.

The SRA's submission at the Issues Paper stage highlighted the following:

- The new Development Plan will require a strong and distinct focus and emphasis on the Metropolitan Area.
- Promoting a collaborative intra-regional partnership approach between Limerick-Shannon, Cork, Waterford and Galway should be a key priority.
- The distribution of future growth needs to align with the principles of integrated land use and transport planning, especially under the emerging Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) and through Local Transport Plans.
- The RSES includes specific objectives in relation to compact growth and for Metropolitan Areas e.g., *RPO 10: Compact Growth for Metropolitan Areas*.
- Shannon is central to delivering the ambition for the Limerick-Shannon Metropolitan **Area's** economic development and success.
- The Draft Plan and Core Strategy should reflect RSES priorities by positioning Ennis to develop its role as a self-sustaining regional driver within the Southern Region.
- The Planning Authority will have regard to the RSES settlement typology and apply guiding principles as per *Section 3.3: A Tailored Approach*.
- Include appropriate guidance for new homes in small towns and villages and renewal initiatives.
- Identify areas under strong urban influence in the hinterlands of settlements. See *Section 3.7: Rural Areas* of the RSES
- The regeneration and development of urban brownfield and infill sites to achieve higher density populations needs to be a priority.
- Chapter 3 and 4 of the RSES identifies the importance of networks in sharing assets and collaborating to drive economic growth.
- Collaboration is required between Irish Water and local authorities to agree phasing, water and wastewater services to accommodate growth in a phased, sustainable manner.

- Appropriate account should be taken of National Climate Policy to ensure appropriate local level policy/objectives enable the achievement of sectoral targets that will work towards the broader national transition objectives.
- The transition to a low carbon economy can offer significant opportunities to achieve sectoral diversification.
- The integration of Blue Green Infrastructure (BGI) and Nature-Based Solutions (NBS) into policy formulation offers opportunities to reduce costs, enhance utilisation of existing infrastructure while creating a climate resilient economy.
- Provide policy support for the work of the Climate Action Regional Offices (CAROs).
- The five economic principles of the RSES should be reflected and integrated into the Development Plan
- The delivery of actions under Mid-West Regional Enterprise Plan and Mid-West Regional Skills Forum should be supported.
- The RSES requires phased growth targets in tandem with infrastructure.
- The integration of ecosystem services into the preparation of the Draft Development Plan as per RPO 110.
- Building and expanding on the UNESCO Learning City concept to deliver a Learning Region can develop pillars of inclusive and sustainable development that will benefit all. In preparing policy responses in the Draft Development Plan, reference should be made to *RPOs 186: Lifelong Learning* and *RPO 190: Lifelong Learning and Healthy Cities*.

It is important to reiterate the important role of the Core Strategy to set a framework for the delivery of quality housing, infrastructure and services to meet existing and future housing demand sustainably, deliver on NPF and RSES objectives at the local level and in achieving growth targets, improve the liveability and quality of life in urban and rural areas.

By 2040, the population of the Region is projected to rise to almost two million, requiring new homes and jobs. RSES Appendix 1, page 347 sets out local authority population projections to 2031, which combined deliver a projected uplift between 280,000 to 343,500 in the Region to 2031.

To accommodate this growth, the RSES recognises the strategic role played by all areas in achieving regional and national targets outlined in the NPF. Achieving such ambitious targets will require an equally ambitious alignment in funding priorities, infrastructure and service delivery.

This Core Strategy is therefore a fundamental element in setting Clare on the path to transformational change by 2040 in its guidance for the quantum and location of development. This must be done in a sustainable, infrastructure led manner to achieve national and regional policy targets for accelerated growth in the Region.

## D1.1 Settlement Strategy

Appendix 1 of the RSES, using the figures from the NPF Implementation Roadmap from July 2018, confirms transitional local authority population projections to 2031, which for Clare County are between 10,500 to 12,500 (2016 to 2026) and 15,000 to 18,000 (2016 to 2031).

Chapter 3 of the Draft Plan details the Core Strategy Methodology. The Core Strategy table (Table 3.4) sets out the settlement typology, population allocation and housing units for the plan period.

An overall 11,637 population growth is allocated to 2023 to 2029 and is distributed as follows:

- 23% is allocated to the Key Town of Ennis.
- 49% is allocated to the Metropolitan Area. When taken separately:
  - 30% to the proposed South Clare/University of Limerick (UL) Strategic Development Zone (SDZ).
  - 9% to Shannon.
  - 2% to Limerick City and Suburbs (Athlunkard and Parteen).
- 6% to Service Towns.
- 6% to Small Towns.
- 4% to Large Villages – Tier 1.
- 14% is allocated Unserviced: Tier 2 Large Villages and Small Villages.

From 2023 to 2029 the following population growth projections are indicated in the Core Strategy:

- The Key Town of Ennis is projected to increase by 11%.
- Shannon is projected to increase by 11%.
- The Metropolitan Area of Clare is projected to increase by 25%. This includes a population projection of 3,500 for the proposed South Clare/ UL Economic SDZ.
- Athlunkard and Parteen are each projected to grow by 6%.
- Service Towns are projected to grow by 14%.
- Small Towns are projected to grow by 11%.
- Large Villages-Tier1 are projected to grow by 9%.
- Unserviced: Tier 2 Large Villages and Small Villages are projected to grow by 3%.

The following points are noted in relation to the Settlement Strategy:

- While existing and required zoning is shown on Table 3.4, it is considered that the table should show details of excess and deficit in residential zoned land.
- The Core Strategy table presents figures for Athlunkard and Parteen, however aggregate figures for the Limerick City and Suburbs portion of Clare should also be included.
- The Core Strategy table refers to **"Brownfield 30%"** as per the Draft Development Plan Guidelines. Minimum Compact Growth targets of 50% for cities and suburbs and 30% for other settlements are contained in *NPO 3* and *RPO 35: Support for Compact Growth*. Clarity on how these minimum Compact Growth targets will be achieved is requested.

There is a notable difference in the population allocations provided for in the NPF/RSES and those contained in the Core Strategy Table. To ensure that the population growth is aligned with national and regional policy further clarity and analysis is required in relation to the following points:

- An additional provision of 25% has been applied to the Core Strategy housing allocation but it is not clear where it has been provided, the basis for the allocation or how it accords with the NPF/RSES.
- The Core Strategy table is not consistent with the population projections identified in the Section 5.0 of the Limerick-Shannon MASP. Based on the LSMASP the population increase for the Limerick City and Suburbs between 2016 to 2031 is 1,629 or 109 per annum. This equates to 652 over a 6-year plan period. The Draft Plan proposed an increase of 44 per annum or 265 over the 6-year plan period. Section 5.0 of the LSMASP outlines the criteria for any proposed reallocation of population from Limerick City and Suburbs. From information provided in the Draft Plan, it is unclear how this criteria has been met.
- The Draft Plan position in relation to the proposed South Clare/ UL Economic SDZ is unclear. The Core Strategy Footnotes state that the project *"has the potential to be in place during the lifetime of this Plan"* but acknowledges that the project is above and beyond the scope of the population allocation and has yet to be designated. At the same time the Core Strategy includes an additional allocation of 3,500 for the proposed South Clare/ UL Economic SDZ within the Core Strategy table.
- In addition to the above, it appears that an additional year has been incorporated into the Draft Plan calculations. The Planning Authority is requested to clarify the timeline included in the plan.
- The Draft Plan provides a population allocation for the plan period 2023 to 2029. From information provided, it is not possible to ascertain the projected population increase from 2016 to 2029. The Planning Authority should address this point as it will provide greater clarity on alignment with NPF Roadmap projections. Consideration should be given to additional information to assist this alignment. For example, the addition of the projected population figures for 2031 could be provided for information purposes.

A range of RSES Objectives are relevant to the SDZ proposal including *RPO 3: Local Authority Core Strategies* and Limerick Shannon MASP Policy Objective 14 which states the objective to:

*"support an application for the designation and subsequent development of the lands zoned as University in the Clare County Development Plan 2017 – 2023 as an Economic Strategic Development Zone (SDZ), subject to the provisions of the Planning Act and all environmental considerations"*.

Section 8.4.2 of the LSMASP details the positive economic proposition of this proposal and states that its impact on the Metropolitan Area would be significant as its enterprise focus would be on an international scale. The RSES recognises the Limerick Northern Distributor Route (LNDR) as a key enabler to transform the Region and it specifically cited in *RPO 167: National Road Project*. The SRA therefore fully supports an application for the proposed South Clare/ UL Economic SDZ in accordance with the RSES and for the Council to pursue this



economic proposition. However, the following points are relevant to this Section 27 submission:

1. The relevant statutory provision for the Designation of Strategic Development Zones is Part IX of the Planning and Development Act which provide a process for the consideration and potential designation (including the type of development) by the Government of sites for strategic development zones and a further process to consider matters such as the extent of any development should the Government decide to designate a site for Strategic Development Zone. The Government has to date not made an order under Part IX regarding the proposed South Clare/ UL Economic SDZ.
2. There is no other statutory provision available to support the inclusion of additional population allocations in the Draft Plan in relation to the proposed South Clare/ UL Economic SDZ or specific allocations over and above that set out in the NPF Roadmap or RSES.
3. The footnotes to the Core Strategy table appear to infer that the proposed SDZ could **be regarded as a 'Long-Term Strategic and Sustainable Development Sites' as per the Draft Development Plan Guidelines**. However, the exact proposals are unclear and from information provided, it is difficult to determine if the criteria of the Draft Guidelines are met.
4. The Draft Plan states that pending the completion of the masterplanning exercise, the exact number of housing units to be provided is unclear. It is noted that the Draft Plan does not include details of how and when these lands will be serviced by necessary infrastructure.

Section 3.3 of the RSES refers to compliance with NPO 72 of the NPF on a standardised, tiered approach that differentiates between zoned land that is serviced and that which is serviceable within the life of the plan, and the provision of cost estimates to deliver services and infrastructure.

Section 3.4.1 of the Draft Plan states that all lands identified for development are in **accordance with the "Tiered Approach to Land Use Zoning" as set out in the NPF and identified in Appendix 1 of the Volume 3's**. Scores have been applied to individual infrastructure requirements but the overall tier in which this is to occur is not cited. It is therefore unclear how the local authority has differentiated between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan. In addition, the Serviced Land Assessment **has not been correlated to the land use zoning in the Volume 3's**. Zoning which includes residential use has been provided for the Small Villages in the Ennis, West Clare and Killaloe Municipal District Areas. However, these settlements have not been included in the Serviced Land Assessment.

Other points:

- Additional lands are zoned **in some settlements to cater for the 'net need' as per the Clare County Council's Housing list. However, the methodology for the application of NPF population and housing projections into local authority plan processes, as per Department Guidelines<sup>1</sup>, already incorporates "homeless households and unmet demand"**.

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<sup>1</sup> "Housing Supply Target Methodology for Development Planning" Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act, 2000 (as amended). December 2020.

- Details including quantification of area, units and extant permissions are not included in the majority of existing zonings/ residential development or areas proposed for residential development in the Volume 3's.

### Recommendation 1: Settlement Strategy

- a) The Core Strategy figures for Limerick City and Suburbs and the Metropolitan Area are inconsistent with Table 1 of the Limerick-Shannon MASP. As a result, there are concerns with the overall County figures and their alignment with the RSES and NPF Implementation Roadmap. The Planning Authority is requested to revisit the Core Strategy population figures, clarify calculations and make any appropriate amendments to the Core Strategy to ensure alignment with the NPF Implementation Roadmap and consistency with Table 1 of the Limerick-Shannon MASP.
- b) Limerick Shannon MASP Policy Objective 14 supports an application for the designation and subsequent development of the lands zoned as University in the Clare County Development Plan 2017 – 2023 as an Economic Strategic Development Zone (SDZ) subject to the provisions of the Planning Acts and all environmental considerations. Section 8.4.2 of the LSMASP details the positive economic proposition of this proposal. The Regional Assembly supports an application for the proposed South Clare/ UL Economic SDZ in accordance with the RSES and for the Council to pursue this proposition. However, the Regional Assembly considers that additional clarity is required in order to demonstrate that the pathway pursued supports the delivery of the project in accordance with the RSES. The Draft Plan acknowledges that the project **is 'above and beyond the scope of the population allocation' nonetheless** the Core Strategy contains specific population allocations relating to the project. In this regard it is noted that no order has been made to date under the Part IX process of the Planning Acts and pending the completion of this process the inclusion of specific allocations within the Core Strategy would appear to be premature. The Planning Authority is requested to respond to the above points and to provide additional clarity and analysis to demonstrate that the approach followed is consistent with the RSES. It is considered that an alternative approach could be examined to ensure that the Planning Authority can pursue and advance the proposed South Clare/ UL Economic SDZ subject to the provisions of the Planning Act.
- c) The Draft Plan states that **'Additional provision' of 25% has been applied to the Core Strategy**. It is unclear where this 25% is derived from, where it is to be applied or how it complies with the NPF, RSES or national guidelines. To ensure that the approach taken is consistent with the NPF and RSES it is recommended to set out the methodology on the figures were derived and only those consistent with the NPF, RSES RPO 3, RPO 11 and the Guiding Principles under *Section 3.3: A Tailored Approach* should be included.
- d) The Draft Plan states that additional lands are zoned in some settlements to cater for **the 'net need' as per the Clare County Council's Housing list**. However, the methodology for the application of NPF population and housing projections into local authority plan processes, as per Department Guidelines, already incorporates **"homeless households and unmet demand"**. The Planning Authority is requested to address this point and to make changes accordingly.

- e) The Planning Authority is requested to incorporate extant planning permissions in undertaking an analysis of the area of land in hectares zoned for residential development in each settlement and the proposed number of housing units to be included in the area.
- f) The Planning Authority is requested to clarify information on the prioritisation of zoned land to be services for development including service status, i.e., whether classified as **'Tier 1 Serviced Lands' or 'Tier 2 Serviceable Lands', as well as potential housing yield estimates**. Accompanying maps, that identify Tier 1 and Tier 2 lands in relation to land use zonings would provide a better visual explanation to the reader. When considering zoning lands that require investment in service infrastructure, the Planning Authority should include the reasonable cost estimates of delivering required services.
- g) The Draft Plan provides a population allocation for the plan period 2023 to 2029. From information provided, it is not possible to ascertain the projected population increase from 2016 to 2029. The Planning Authority should address this point to demonstrate alignment with NPF Roadmap projections. The addition of the projected population figures for 2031 could be provided for information purposes.
- h) In addition to the above, it appears that an additional year has been incorporated into the Draft Plan calculations. The Planning Authority is requested to clarify the timeline used for the Draft Plan calculations and to ensure that the timeline is consistent with the Development Plan.

## D1.2 Limerick-Shannon Metropolitan Area

The NPF has presented a unique opportunity for the accelerated growth and transformational development of the Limerick-Shannon Metropolitan Area. **The Southern Region's three Metropolitan Areas** are primary economic engines for the Region. It is a national and regional priority that Limerick-Shannon Metropolitan Area achieves its full potential. The SRA submission on the Issues Paper recommended that the MASP should find a strong expression in the new Development Plan. The submission acknowledged that the Issues Paper presented the opportunities for Shannon but noted a lack of emphasis on the Limerick City and Suburbs component of County Clare and the remainder of the Metropolitan Area within Clare.

Volume 3(b) contains the Shannon Municipal District and includes the Limerick-Shannon Metropolitan Area. The following comments are made in relation to the MASP:

- Details of the Limerick-Shannon Metropolitan Area are found in various parts of the Draft Plan rather than in one distinctive location. It is considered that the Draft Plan should provide a coherent and distinct expression for the MASP to capitalise on the clear priority given through national and regional policy.
- The Clare component of the Limerick City and Suburbs should be represented consistently within the plan.
- **LSMATS Policy Objective 1 states that it's an objective to promote the Limerick-Shannon Metropolitan Area as a cohesive Metropolitan Area**. It is considered that the Draft Pan should be strengthened by additional content (or chapter) to set out how the vision for the Limerick-Shannon MASP will be implemented. It is considered that this should include a shared section developed with Limerick City and County Council and the SRA relating to the MASP and which could be included in both Development Plans.

- The relationship to the wider Limerick City and Suburbs is not presented, lacks discussion and the policy approach is not clear.

It is noted that a Draft Shannon Town Centre Masterplan is currently being prepared as a separate process. This is a welcomed initiative that will assist in enhancing placemaking as per LSMAPS Policy Objective 21. In addition, the Draft Plan states that a new Shannon and Environs Local Area Plan will be prepared for Shannon Town and Environs during the life of this plan.

Section 2.2 of the LSMATS states that Shannon is identified for significant population growth i.e., greater than 30% population increase by 2040 (from a baseline of Census 2016). This would provide Shannon with a population of circa 12,869 by 2040 or an increase of 2,970 from 2016. The Draft Plan Core Strategy indicates that Shannon is projected to increase in population by 11% or 1,060 people from 2023 to 2029. From information provided in the Core Strategy, it is not possible to ascertain the projected population increase for Shannon from 2016 to 2029. In this regard, recommendation 1(g) of this submission should be addressed.

Section 4.4. of the RSES promotes a co-ordinated, co-operative, and collaborative intra-regional partnership between the Regions three Cities and their Metropolitan Areas and Galway in the Northern and Western Region. It would be beneficial if the promotion of this collaborative intra-regional partnership approach between Limerick-Shannon, Cork, Waterford and Galway was referenced in the Development Plan. Within the context of the ongoing reviews of Development Plans, the Planning Authority is encouraged to develop this collaborative intra-regional partnership approach as a priority.

#### Recommendation No 2: Limerick-Shannon Metropolitan Area

- LSMASP Policy Objective 1 states that it's an objective to promote the Limerick-Shannon Metropolitan Area as a cohesive Metropolitan Area.** It is recommended that the Development Plan and Core Strategy table provide additional content on the Metropolitan Area to reflect its identification in the NPF and RSES settlement hierarchy as a priority location for significant housing and employment growth and develop the **Limerick Shannon MASP Vision for the Metropolitan Area 'to exert critical-mass leverage at an international level'.** In recognition of the significant role which Clare County Council plays in the implementation of the LSMASP, it is recommended that a distinct section/ chapter is provided to address the challenges and opportunities which the Metropolitan Area provides for the Region. This should include a shared section developed with Limerick City and County Council and the SRA relating to the MASP which could be included in both Development Plans. The Regional Assembly are happy to assist in the development of this content.
- The Regional Assembly considers that greater clarity and analysis on the population projections in relation to the Limerick City and Suburbs and Metropolitan Area is required to strengthen the Core Strategy and to demonstrate that the approach is consistent with the Limerick-Shannon MASP. This should be expressed in a revised Core Strategy and should include the population categories referenced for the Limerick Shannon MASP in the NPF Roadmap and Section 5.0 of the MASP
- Section 2.2 of the LSMATS states that Shannon is identified for significant population growth i.e., greater than 30% population increase by 2040. From information provided in the Core Strategy, it is not possible to ascertain the projected population increase

for Shannon from 2016 to 2029. In this regard, recommendation 1(g) of this submission should be addressed. It is recommended that the Draft Plan should promote a collaborative intra-regional partnership approach between Limerick-Shannon, Cork, Waterford and Galway reflecting their priority status within the NPF.

## D1.2 Key Town of Ennis

The SRA welcomes *Volume 3a: Ennis Municipal District Settlement Plans* and the positive section on Ennis. It is noted that a new Ennis and Environs Local Area Plan will be prepared during the lifetime of this Plan. The policy approach provides a commitment to compact growth in Ennis and Section 1.4 of this submission details how this can be strengthened.

As one of six large-scale Key Towns in the Region, Ennis (see RPO 13) plays a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. *Section 3.5: Key Towns* of the RSES states:

*"These Key Towns are self-sustaining regional drivers and have a comparable structure to the five regional growth centres identified in the NPF. Given their considerable scope for growth, it is envisaged that local authorities should plan for population growth of more than 30% by 2040."*

This means that Ennis should plan for a population of in excess of 32,859 by 2040 or an increase of 7,583 from 2016. It is noted that Ennis 2040 strategy envisages that the population of Ennis will grow on average by 1.6% per annum to approximately 37,000 people by 2040. The Draft Plan Core Strategy indicates that Ennis is projected to increase in population by 11% or 2,780 people from 2023 to 2029. It is noted that Ennis 2040 strategy envisages that the population of Ennis will grow on average by 1.6% per annum to approximately 37,000 people by 2040. However, from information provided in the Core Strategy, it is not possible to ascertain the projected population increase for Ennis from 2016 to 2029. In this regard, recommendation 1(g) of this submission should be addressed. Consideration should be given to the addition of the projected population figures for 2031 for information purposes.

### Recommendation No 3: Key Town of Ennis

Key Towns play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. *Section 3.5: Key Towns, RPO 11: Key Towns* and *RPO 13: Ennis* provide a significant policy platform for the role and future development of Ennis. From information provided in the Core Strategy, it is not possible to ascertain the projected population increase for Ennis from 2016 to 2029. In this regard, recommendation 1(g) of this submission should be addressed.

### D1.3 Towns, Villages, Clusters and Open Countryside

The RSES is committed to supporting people and places throughout the Region – all communities both urban and rural. Rural towns and villages are the local drivers for their surrounding areas and a sustainable, infrastructure-led growth approach is encouraged at the appropriate scale for all these settlement types. In addition, the RSES reflects the position of **the NPF, that our countryside** *"is and will continue to be, a living and lived-in landscape focusing on the requirements of rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise, while at the same time avoiding ribbon and overspill development from urban areas and protecting environmental qualities."*

RSES RPO 3: Local authority Core Strategies requires that local authorities shall **"determine a hierarchy of settlement and appropriate growth rates in accordance with the guiding principles and hierarchy of settlement in the RSES"**. The Core Strategy contains a category titled **"Unserviced: Tier 2 Large Towns & Small Villages"**. It is unclear if this category includes Clusters and open countryside which appear in *Table 3.1: Settlement Hierarchy* but are unaccounted for in the Core Strategy.

It is evident that many of the Tier 2 Large Villages and Small Villages have a Census settlement population. Many of these settlements are sizeable and benefit from physical infrastructure, local services, education, social and community facilities. These settlements include lands for residential use however, it is not clear what housing and population allocations have been provided to each settlement. Further detail and consideration should be given to these tiers to identify villages with capacity to absorb development, and to support rural regeneration within these areas. These settlements should be expressed in a revised Core Strategy.

The Core Strategy defines Cratloe and Ardnacrusha (populations of 692 and 1,383 respectively) as **'Small Villages'**. Both appear in the Core Strategy table under Metropolitan Area but no population allocation or housing units have been assigned to these settlements. The Planning Authority is requested to address this issue and provide associated details.

The Settlement Hierarchy proposes 94 Clusters which appear to be included in the **"Unserviced: Tier 2 Large Towns & Small Villages"** category in the Core Strategy table and the associated projected growth is unclear. The Planning Authority is requested to clarify the relevant allocations and to review if the number of Clusters is consistent with modal shift to more sustainable transport, availability of social and physical infrastructure and the viability and vitality of towns and villages in the higher tiers. The Planning Authority is requested to clarify the approach proposed to ensure there is not an imbalance in the settlement strategy approach and that there is consistency with climate and sustainable transport related objectives, in particular Section 2.7.2:

*"The Core Strategy of the Development Plan as set out in Chapter 3 outlines the parameters for the settlement strategy in Clare in terms of the consolidation and planned growth of existing settlements and the sustainable development of rural areas and communities. The Core Strategy also facilitates the further reduction of greenhouse gas emissions through compact growth and the acceleration of the shift to sustainable mobility."*

#### Recommendation 4: Towns, Villages, Clusters and Open Countryside

- a) The Planning Authority is requested to clarify if the “unserviced” category includes Clusters and open countryside. These appear in *Table 3.1: Settlement Hierarchy* but are unaccounted for in the Core Strategy.
- b) The Planning Authority is requested to clarify the individual population and housing projections for the Tier 2 Large Villages and Small Villages. These settlements should be expressed in a revised Core Strategy.
- c) The Small Villages of Cratloe and Ardnacrusha appear in the Core Strategy table but no population allocation or housing units have been assigned to these settlements. The Planning Authority is requested to address this issue and provide associated details.
- d) The Settlement Hierarchy proposes 94 Clusters which appear to be included in the “*Unserviced: Tier 2 Large Towns & Small Villages*” category in the Core Strategy table, however the projected growth for these is unclear. The Planning Authority is requested to review if each of Clusters referenced are consistent with effective Climate Action, modal shift to more sustainable transport, availability of social and physical infrastructure and the viability and vitality of towns and villages in the higher tiers and to revise the Core Strategy accordingly.
- e) Prior to finalisation of the Draft Plan, it is recommended that the Council should ensure that policies and objectives relating to housing in the open countryside is consistent with RPO 27, national policy (NPO 17), Circular Letter PL Circular letter PL 2/2017 Re: Sustainable Rural Housing Guidelines for Planning Authorities and is also consistent with other objectives in the Draft Plan for Climate Action and environmental management.

#### D1.4 Compact Growth

Compact growth and regeneration are cross-cutting themes for settlements of all sizes. *Section 3.11: Regeneration* of the RSES states that the regeneration and development of urban brownfield and infill sites to achieve higher density populations will need to be a priority for local authority plans, with a focus given to mixed-use developments for vibrant living and working urban centres. *Section 7.2: City Centre Consolidation and Regeneration* of the Limerick-Shannon MASP states that as regeneration issues in Shannon are similar to Limerick City, there are opportunities for both local authorities to work together to overcome challenges. This should be explored further through the Development Plan process.

RPO 34: Regeneration, Brownfield and Infill **Development states that, in pursuit of the NPF’s NPO 3a, 3b and 3c, the Development Plan Core Strategy should be accompanied by specific objectives setting out the achievement of urban infill/ brownfield development. Considerations for brownfield site remediation are provided by RPO 34.**

For Ennis, Shannon and other towns and settlements, RPO 35 (c) states:

***“Development Plans shall set out a transitional minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs, within their existing built-up footprints in accordance with NPF National Policy Objective 3c.*”**

In relation to the Limerick City and Suburbs, this minimum requirement is 50%. In all cases RPO 35 requires an evidence-based approach on availability and deliverability of lands within the existing built-up footprints.

Section 18.3.1 of the Draft Plan is welcomed as it supports the delivery of compact growth. The role compact growth has in supporting Climate Action is also recognised in *Table 1: Five Strategic Development Plan Principles*. Compact growth is also supported in Objectives CDP 4.3: Compact Growth in the Limerick-Shannon Metropolitan Area, CDP 4.6: Small Towns CDP 4.7: Large Towns, CDP 4.8: Small Villages, CDP 4.13: Planned Growth of Settlements and CDP 11.1: Regional Spatial and Economic Strategy. However, these objectives do not identify mention compact growth targets and this should be addressed in the plan.

As previously referenced, the Core Strategy table refers to **“Brownfield 30%”** as per the Draft Development Guidelines. Minimum Compact Growth targets of 50% for cities and suburbs and 30% for other settlements are contained in NPO 3 and *RPO 35: Support for Compact Growth*. Clarity on how these minimum Compact Growth targets will be achieved on this point is requested.

The settlement boundaries of Parteen and Athlunkard are within the existing built-up footprint of Limerick City and Suburbs and it appears that a compact growth target of 100% is achievable. Therefore, high levels of compact growth may be achieved. The ongoing master plan for Shannon and the strong regeneration focus for Ennis also present an opportunity to set high compact growth targets.

It is considered that further clarities **and amendments to the Core Strategy and Volume 3’s** would assist the achievement and monitoring of compact growth targets. This could be achieved by the identification of the number and percentage of units targeted for greenfield development and those targeted for the existing built-up footprint within the maps and details **presented in the Volume 3’s**. Inclusion of the yield of residential units from zoned sites within the built-up footprint would assist Development Plan monitoring on how each settlement is performing successfully under NPF and RSES compact growth objectives, including RPO 35 and NPO 3. This would provide a beneficial visual indication to the reader of where in the settlement new housing will achieve compact growth targets.

*Section 3.9: Placemaking* of the RSES states that increasing residential densities can deliver a Sustainable Place Framework (as per RPO 31) and 10 Minute Towns. It is considered that the Draft Plan has not optimised the density approach. For example, the density assumptions for Ennis are between 35 to 15. However, the relevant Government Guidelines<sup>2</sup> state that within centrally located sites, densities of 30-40+ dwellings per hectare may be appropriate. The Planning Authority should reconsider the Core Strategy density approach to align with Section 3.9 of the RSES, RPO 31, and national Guidelines. The Planning Authority should also demonstrate how the density assumptions for the Limerick City and Suburbs component of Clare align with the rest of the settlement.

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<sup>2</sup> Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages). May 2009.

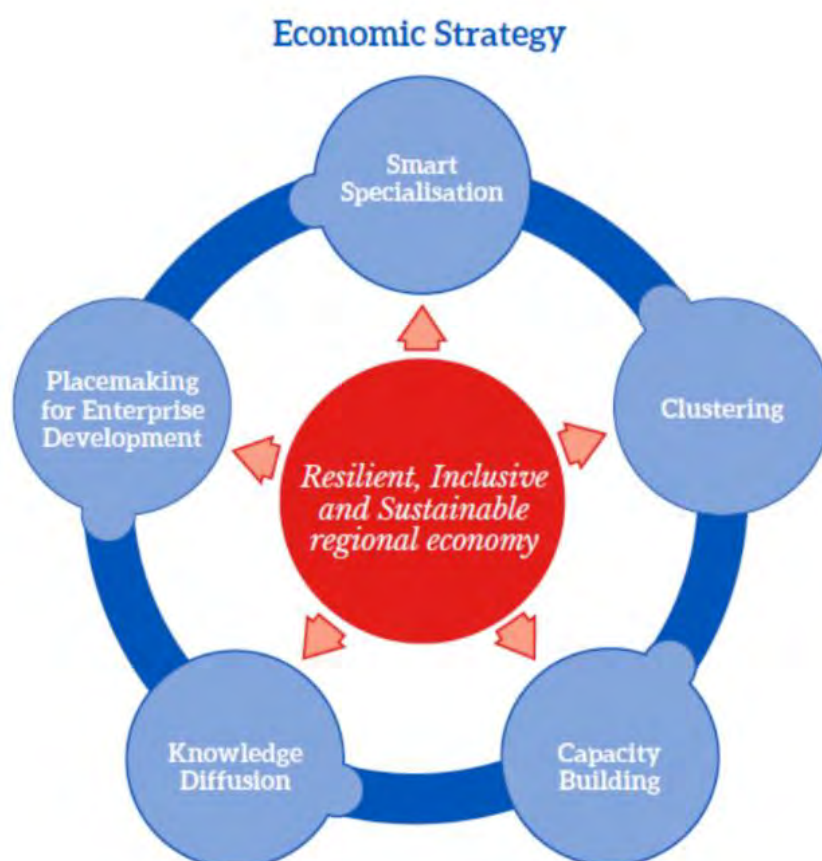


## Recommendation 5: Achieving Compact Growth Targets

- a) The Draft Plan contains a positive commitment to achieving compact growth through objectives, regeneration and active land management initiatives. To build on this commitment it is recommended that the Plan demonstrate how targets for compact growth, as per RPO 35 (Support for Compact Growth), are being met within the existing built-up footprints of settlements. This could be achieved by the identification of the number and percentage of units targeted for greenfield development and those targeted for the existing built-up footprint within the maps and details presented in **the Volume 3's**. Inclusion of the yield of residential units from zoned sites within the built-up footprint would assist Development Plan monitoring on how each settlement is performing successfully under NPF and RSES compact growth objectives, including NPO 3 and RPO 35.
- b) The Core Strategy table refers to **"Brownfield 30%"** plan as per the Draft Development Plan Guidelines. Minimum Compact Growth targets of 50% for cities and suburbs and 30% for other settlements are contained in NPO 3 and *RPO 35: Support for Compact Growth*. Clarity on how these minimum Compact Growth targets will be achieved on this point is requested.
- c) The Planning Authority should reconsider the Core Strategy density approach to align with Section 3.9 of the RSES, RPO 31, and Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages). The Planning Authority should also demonstrate how the density assumptions for the Limerick City and Suburbs component of Clare align with the rest of the settlement.

## D2 A Strong Economy

*Chapter 4: A Strong Economy Innovation and Smart* of the RSES provides a 'regionalisation' of national economic policy. The RSES states that our Region needs to transform our enterprise base through diversification and innovation for longer term resilience while managing potential vulnerabilities. The SRA submission on the Issues Paper recommended that the five economic principles underpinning the RSES economic strategy should be reflected and integrated into the Development Plan.



*Chapter 6: Economic Development and Enterprise* of the Draft Plan presents the economic strategy. This is complemented by *Chapter 8: Rural Development and Natural Resources*. In relation to the five RSES economic principles, placemaking is well represented in *Chapter 18: Design and Placemaking*. However, it is not clear of how the other economic principles of the RSES have been reflected and integrated into the economic strategy. The Draft Plan would benefit from addressing this issue as these principles were identified in the RSES as the underlining conditions to increase the economic performance and resilience of locations. In this regard the SRA request that the Economic Strategy 5 be reviewed to incorporate the **5 principles of the Region's Economic Strategy**.

It is considered that this would strengthen the overall chapter on economic development and provide additional policy focus in areas such as Clustering, Smart Specialisation, Capacity Building and Knowledge Diffusion alongside Placemaking which is addressed in Chapter 18 and elsewhere in the Draft Plan.

The approach taken to rural economic development is positive and, taken in conjunction with *Chapter 12: Shannon Estuary* and *Chapter 13: Marine and Coastal Zone Management*, has strongly committed to Climate Action as a significant part of a sustainable economic growth model. To strengthen this approach the Planning Authority should include a section on Climate Action and Job Creation/Economic Development. (see Section D3 of this submission).

#### Recommendation 6: RSES Economic Principles

It is recommended that the Draft Plan economic strategy be reviewed to incorporate the 5 **principles of the Region's Economic Strategy as set out in** Chapter 5 of the RSES including Clustering, Capacity Building, Smart Specialisation and Knowledge Diffusion.

### D3 Climate Action

Climate Action is a clear priority for the Draft Plan and Table 2.1 provides details of how it has been mainstreamed in the Draft Plan.

The Climate Action and Low Carbon Development (Amendment) Act 2021 means that Ireland is now on a legally binding path to net-Zero emissions no later than 2050, and to a 51% reduction in emissions by 2030. EU legislation will be updated with a view to implementing the new proposed target of reducing net greenhouse gas emissions by at least 55% by 2030. Climate Action policy, internationally and nationally, is evolving rapidly and the Planning Authority should consider how to respond and quantify its Climate Action policies and objectives.

This may include, for example, the inclusion of appropriate existing baseline figures for modal share for travel to work, school, inter alia, and realistic targets for modal change against the baseline figures provided. This would assist the implementation of *RPO 163: Sustainable Mobility Targets* which states that targets and actions will help achieve higher performance in modal shift to sustainable mobility. RPO 163 states that significant progress is sought for the Southern Region to reduce the modal shift of private car travel and increase the modal share of travel by walking, cycling, public transport and car sharing.

The RSES advocates for greater economic and sectoral diversification, particularly in rural areas where it has been shown that many towns and villages are vulnerable to the effects of economic changes and shocks such as COVID-19 restrictions. The transition to a low carbon economy can offer significant opportunities to achieve sectoral diversification in these areas. It is considered that the Draft Plan should include a section on Climate Action and Job Creation/Economic Development. Climate change mitigation and adaptation open up new opportunities to promote sustainable local development including building inclusive, climate resilient and energy efficient communities. This should be further explored in the Draft Plan. *RPO 56: Low Carbon Economy*, and Section 1 of Chapter 5 of the RSES are particularly relevant.

The settlement strategy, achieving compact growth and the provision of sustainable land use zoning are key to **in securing the Plan's** ambition for Clare to be a national leader in Climate Action (as per *Section 1.5: A Vision for Clare*). In this respect, responding to Recommendations 1, 2, 3, 4, 7 and 8 will also contribute to Climate Action.

## Recommendation 7: Climate Action

- a) The transition to a low carbon economy can offer significant opportunities to achieve sectoral diversification, particularly for rural areas. It can also promote sustainable local development including building inclusive, climate resilient and energy efficient communities. It is recommended that this should be further explored in the Draft Plan by the inclusion of a section linking climate action, job creation and economic development. *RPO 56: Low Carbon Economy*, and Section 1 of Chapter 5 of the RSES is particularly relevant.
- b) Having regard to the important leadership role played by the local authority, the evolving and highly ambitious Climate Action legislative and policy platforms at national and EU level, the Planning Authority should strengthen the Climate Action policies and objectives. *RPO 163: Sustainable Mobility Targets* is particularly relevant in this regard as it calls for targets and actions which will help achieve higher performance in modal shift to sustainable mobility. In addition to addressing implementation and consistency with RPO:163, the Planning Authority should consider how Climate Action targets could be applied to other areas of the Draft Plan.

### D4 Sustainable Mobility and Transport

*Section 11.2: Access and Movement* of the Draft Plan focuses on integrating land use and transport. The SRA also notes the focus on the integration of the implementation of the Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS), Active Travel Towns programme, Local Transport Plans (LTP) and on the 10 Minute Town Concept to support active travel and modal change to use of green travel modes. The MATCH-UP Interreg Project on 10 Minute Towns is mentioned by the Draft Plan and it will be a useful reference for practical implementation of the concept. The final report – 10 Minute Towns - Accessibility and Framework Report published in July 2020 is available at <http://www.southernassembly.ie/eu-projects/MATCH-UP>.

*Section 6.0: Integrated Land Use and Transport* of the Limerick-Shannon MASP states the principles underpinning the MASP include the effective integration of transport planning with spatial planning policies, from regional to local level and the alignment of associated transport and infrastructure investment. The LSMATS will be instrumental in the regeneration and transformation of Limerick City and the wider Metropolitan Area. It is noted that the LSMATS is currently at draft stage and that the Draft Plan transport policy may evolve with future iterations.

Policy Objective 6 (b) of the Limerick-Shannon MASP states that the Development Plan will identify public transport corridors and nodal points on corridors in the Metropolitan Area arising from the LSMATS which have potential to support high density development/regeneration. In addition, the Development Plan shall identify the appropriate land use zonings for these nodal points and demonstrate the effective alignment between land use and transport infrastructure planning and delivery of the NPF Compact Growth targets as they apply to the Limerick-Shannon Metropolitan Area. Policy Objective 6 (d) states that it is an objective to seek sustainable higher densities where practicable at public transport nodal points.

Reference to public transport corridors in made in Objective CDP10.16 of the in relation to Primary and Secondary Education. However, it is considered that the incorporation of the provisions of Policy Objective 6 (b) and (d) of the Limerick-Shannon MASP into a specific objective, for example Objective CDP11.3, would further strengthen the policy commitment **to sustainable transportation and enhanced alignment with Guiding Principle “Integrated transport and land use” as contained in Section 3.2 of the Limerick-Shannon MASP.**

The Section *"A Smart Metropolitan Area and Strengths in Attracting FDI"* of the Limerick-Shannon MASP discusses the autonomous vehicle industry in the Metropolitan Area and in particular the development of a Connected and Autonomous Vehicle (CAV) testbed in Shannon. It is considered that further alignment with Section 8.3 and Policy Objective 12 of the Limerick-Shannon MASP can be achieved by elaborating on the opportunities for the Metropolitan Area as a whole. Section D1.2 and Recommendation 2 of the submission refers to a shared section developed with Limerick City and County Council and the SRA relating to the MASP and which could be included in both Development Plans. This may offer an opportunity to focus on this particular subject matter.

#### Recommendation 8: Sustainable Mobility and Transport

- a) It is considered that the incorporation of the provisions of Policy Objective 6 (b) and (d) of the Limerick-Shannon MASP into a specific objective, possibility Objective CDP11.3, would further strengthen the policy commitment to sustainable transportation **and enhanced alignment with Guiding Principle “Integrated transport and land use” as contained in Section 3.2 of the Limerick-Shannon MASP.**
- b) Further alignment with *Section 8.3: A Smart Metropolitan Area and Strengths in Attracting FDI* and Policy Objective 12 of the Limerick-Shannon MASP can be achieved by elaborating on the digital and Smart City opportunities for the Metropolitan Area as a whole. This will assist in developing a positive business ecosystem which is essential to the achieving the vision of the Limerick-Shannon MASP.

#### D5 Infrastructure

The introduction to *Chapter 8: Water and Energy Utilities* of the RSES states that the sustainable growth of the Region requires the planned provision of services and infrastructure which is central to the strategy of the RSES and Regional Strategy Statement 9: *Sustainable Planned and Infrastructure-led Development*. RPO 208 states that Core Strategies shall demonstrate phased infrastructure led growth to meet demands on the water supply. RPO 212 states that for the management of wastewater, increasing population growth should be planned on a phased basis in collaboration with Irish Water.

When considering zoning lands that require investment in service infrastructure, Planning Authorities are required to include the reasonable cost estimates of delivering required services at both the Draft and final plan stages. Recommendation 1 (f) of this submission should be noted in this regard.

## D6 Environment

The inclusion of Green Infrastructure and Nature Based solutions across the Draft Plan is welcomed. It is recommended that Green Infrastructure is expanded to Blue Green Infrastructure. This will assist alignment with Section 3.2 Guiding Principles of the LSMASP, Section 2 of Chapter 5 of the RSES and RPO 123. Blue Green Infrastructure Strategies are currently underway for Cork City and Limerick City and the Planning Authority should consider the preparation of Blue Green Infrastructure Strategies for the county or settlements during the lifetime of the Plan.

**The RSES promotes the recognition of 'services' provided by the natural environment in Section 5.2, where the term 'ecosystem services' is applied to the benefits derived from our ecosystem.** The integration of ecosystem services into the preparation of the Draft Development Plan as per RPO 110 is an important tool in this regard. Section 6.20 of the Draft Plan highlights the importance of agriculture to the rural economy. Ecosystem Services can play an important role in developing the capacity of this sector to realise climate and environmental targets. Agriculture in the Region has displayed that it has considerable adaptability to respond to Climate Action and environmental imperatives. This includes examples of agri-environmental schemes such as the Burren Programme, Mulkear River Catchment Project, BRIDE project and the River Allow Catchment Management Group. These are innovative local solutions to global problems and are positive examples of payments for Ecosystems Services.

The Flood Maps are provided in the Strategic Flood Risk Assessment in Volume 10. However, these are not overlaid on the land use zoning maps in the **Volume 3's**. It is therefore difficult to understand the implication and impact on land use zoning. The Planning Authority is requested to address this issue.

### Recommendation 9: Environment

- a) It is recommended that reference to 'Green Infrastructure' is expanded to include 'Blue Green Infrastructure'. This will assist alignment with Section 3.2 Guiding Principles of the LSMASP, Chapter 5 of the RSES and RPO 123.
- b) Having regard to *RPO 110: Ecosystem Services* of the RSES and NPO 58 of the NPF, the Planning Authority is requested to clarify how ecosystem services have been incorporated into the preparation of the Draft Plan.
- c) The Planning Authority is requested to provide greater clarity in the Volume **3's** in relation to flooding implications for land use zoning. Consideration should be given to overlaying relevant maps contained in the Strategic Flood Risk Assessment on the land use zoning maps.

## D7 Sustainable Communities

*Chapter 10: Sustainable Communities* of the Draft Plan presents the strategic aims and objectives required to support community development, enhance social infrastructure, promote social inclusion and support physical, social and cultural integration as well as addressing deficits.

Placemaking and regeneration of towns and villages is supported and more detail on these issues are provided in Chapters 17 and 18. The Draft Plan is particularly strong in its policy approach to sustainable communities and has provided a wide-ranging framework in seeking to achieve a good quality of life.

## D8 Environmental Assessment

We note the preparation of a Strategic Environmental Assessment Environmental report, Natura Impact Report (Appropriate Assessment) and Strategic Flood Risk Assessment (SFRA) published alongside the Draft Plan.

The RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Clare County Council review these documents to inform the **Council's own environmental assessments and to ensure that mitigation measures identified** to address environmental sensitivities and constraints are included in the Draft Development Plan where relevant.

## CONCLUSION

The SRA welcomes the public consultation on the Draft Development Plan. The preparation of this Development Plan comes at a critical stage in the implementation of the RSES and the Limerick-Shannon MASP. These observations are therefore provided to assist and strengthen policies and objectives and to strengthen alignment between the Draft Development Plan and RSES Strategy and MASP. However, the submission should be read in its totality.

In overall terms, the SRA consider that the Draft Development Plan, and its Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy for the Southern Region by addressing the recommendations and observations set out above.

Further engagement between the SRA as a key stakeholder and the local authority in the next phases of the Draft Development Plan is encouraged. The RSES team are available for future consultation and for any clarification required regarding this submission.

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A handwritten signature in blue ink that reads "David Kelly". The signature is written in a cursive style with a large, looped 'D' and 'K'.

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David Kelly

Director Southern Regional Assembly



## Appendix 1: List of Recommendations

### Recommendation 1: Settlement Strategy

- a) The Core Strategy figures for Limerick City and Suburbs and the Metropolitan Area are inconsistent with Table 1 of the Limerick-Shannon MASP. As a result, there are concerns with the overall County figures and their alignment with the RSES and NPF Implementation Roadmap. The Planning Authority is requested to revisit the Core Strategy population figures, clarify calculations and make any appropriate amendments to the Core Strategy to ensure alignment with the NPF Implementation Roadmap and consistency with Table 1 of the Limerick-Shannon MASP.
- b) Limerick Shannon MASP Policy Objective 14 supports an application for the designation and subsequent development of the lands zoned as University in the Clare County Development Plan 2017 – 2023 as an Economic Strategic Development Zone (SDZ) subject to the provisions of the Planning Acts and all environmental considerations. Section 8.4.2 of the LSMASP details the positive economic proposition of this proposal. The Regional Assembly supports an application for the proposed South Clare/ UL Economic SDZ in accordance with the RSES and for the Council to pursue this proposition. However, the Regional Assembly considers that additional clarity is required in order to demonstrate that the pathway pursued supports the delivery of the project in accordance with the RSES. The Draft Plan acknowledges that the project **is 'above and beyond the scope of the population allocation' nonetheless the Core Strategy contains specific population allocations relating to the project.** In this regard it is noted that no order has been made to date under the Part IX process of the Planning Acts and pending the completion of this process the inclusion of specific allocations within the Core Strategy would appear to be premature. The Planning Authority is requested to respond to the above points and to provide additional clarity and analysis to demonstrate that the approach followed is consistent with the RSES. It is considered that an alternative approach could be examined to ensure that the Planning Authority can pursue and advance the proposed South Clare/ UL Economic SDZ subject to the provisions of the Planning Act.
- c) **The Draft Plan states that 'Additional provision' of 25% has been applied to the Core Strategy.** It is unclear where this 25% is derived from, where it is to be applied or how it complies with the NPF, RSES or national guidelines. To ensure that the approach taken is consistent with the NPF and RSES it is recommended to set out the methodology on the figures were derived and only those consistent with the NPF, RSES RPO 3, RPO 11 and the Guiding Principles under *Section 3.3: A Tailored Approach* should be included.
- d) The Draft Plan states that additional lands are zoned in some settlements to cater for **the 'net need' as per the Clare County Council's Housing list.** However, the methodology for the application of NPF population and housing projections into local authority plan processes, as per Department Guidelines, already incorporates **"homeless households and unmet demand".** The Planning Authority is requested to address this point and to make changes accordingly.
- e) The Planning Authority is requested to incorporate extant planning permissions in undertaking an analysis of the area of land in hectares zoned for residential

development in each settlement and the proposed number of housing units to be included in the area.

- f) The Planning Authority is requested to clarify information on the prioritisation of zoned land to be services for development including service status, i.e., whether classified as **'Tier 1 Serviced Lands' or 'Tier 2 Serviceable Lands', as well as potential housing yield estimates**. Accompanying maps, that identify Tier 1 and Tier 2 lands in relation to land use zonings would provide a better visual explanation to the reader. When considering zoning lands that require investment in service infrastructure, the Planning Authority should include the reasonable cost estimates of delivering required services.
- g) The Draft Plan provides a population allocation for the plan period 2023 to 2029. From information provided, it is not possible to ascertain the projected population increase from 2016 to 2029. The Planning Authority should address this point to demonstrate alignment with NPF Roadmap projections. The addition of the projected population figures for 2031 could be provided for information purposes.
- h) In addition to the above, it appears that an additional year has been incorporated into the Draft Plan calculations. The Planning Authority is requested to clarify the timeline used for the Draft Plan calculations and to ensure that the timeline is consistent with the Development Plan.

#### Recommendation No 2: Limerick-Shannon Metropolitan Area

- a) **LSMASP Policy Objective 1 states that it's an objective to promote the Limerick-Shannon Metropolitan Area as a cohesive Metropolitan Area**. It is recommended that the Development Plan and Core Strategy table provide additional content on the Metropolitan Area to reflect its identification in the NPF and RSES settlement hierarchy as a priority location for significant housing and employment growth and develop the **Limerick Shannon MASP Vision for the Metropolitan Area 'to exert critical-mass leverage at an international level'**. In recognition of the significant role which Clare County Council plays in the implementation of the LSMASP, it is recommended that a distinct section/ chapter is provided to address the challenges and opportunities which the Metropolitan Area provides for the Region. This should include a shared section developed with Limerick City and County Council and the SRA relating to the MASP which could be included in both Development Plans. The Regional Assembly are happy to assist in the development of this content.
- b) The Regional Assembly considers that greater clarity and analysis on the population projections in relation to the Limerick City and Suburbs and Metropolitan Area is required to strengthen the Core Strategy and to demonstrate that the approach is consistent with the Limerick-Shannon MASP. This should be expressed in a revised Core Strategy and should include the population categories referenced for the Limerick Shannon MASP in the NPF Roadmap and Section 5.0 of the MASP.
- c) Section 2.2 of the LSMATS states that Shannon is identified for significant population growth i.e., greater than 30% population increase by 2040. From information provided in the Core Strategy, it is not possible to ascertain the projected population increase for Shannon from 2016 to 2029. In this regard, recommendation 1(g) of this submission should be addressed. It is recommended that the Draft Plan should promote a collaborative intra-regional partnership approach between Limerick-Shannon, Cork, Waterford and Galway reflecting their priority status within the NPF.

### Recommendation No 3: Key Town of Ennis

Key Towns play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. *Section 3.5: Key Towns, RPO 11: Key Towns* and *RPO 13: Ennis* provide a significant policy platform for the role and future development of Ennis. From information provided in the Core Strategy, it is not possible to ascertain the projected population increase for Ennis from 2016 to 2029. In this regard, recommendation 1(g) of this submission should be addressed.

### Recommendation 4: Towns, Villages, Clusters and Open Countryside

- a) **The Planning Authority is requested to clarify if the “unserviced” category includes** Clusters and open countryside. These appear in *Table 3.1: Settlement Hierarchy* but are unaccounted for in the Core Strategy.
- b) The Planning Authority is requested to clarify the individual population and housing projections for the Tier 2 Large Villages and Small Villages. These settlements should be expressed in a revised Core Strategy.
- c) The Small Villages of Cratloe and Ardnacrusha appear in the Core Strategy table but no population allocation or housing units have been assigned to these settlements. The Planning Authority is requested to address this issue and provide associated details.
- d) The Settlement Hierarchy proposes 94 Clusters which appear to be included in the **“Unserviced: Tier 2 Large Towns & Small Villages”** category in the Core Strategy table, however the projected growth for these is unclear. The Planning Authority is requested to review if each of Clusters referenced are consistent with effective Climate Action, modal shift to more sustainable transport, availability of social and physical infrastructure and the viability and vitality of towns and villages in the higher tiers and to revise the Core Strategy accordingly.
- e) Prior to finalisation of the Draft Plan, it is recommended that the Council should ensure that policies and objectives relating to housing in the open countryside is consistent with RPO 27, national policy (NPO 17), Circular Letter PL Circular letter PL 2/2017 Re: Sustainable Rural Housing Guidelines for Planning Authorities and is also consistent with other objectives in the Draft Plan for Climate Action and environmental management.

### Recommendation 5: Achieving Compact Growth Targets

- a) The Draft Plan contains a positive commitment to achieving compact growth through objectives, regeneration and active land management initiatives. To build on this commitment it is recommended that the Plan demonstrate how targets for compact growth, as per RPO 35 (Support for Compact Growth), are being met within the existing built-up footprints of settlements. This could be achieved by the identification of the number and percentage of units targeted for greenfield development and those targeted for the existing built-up footprint within the maps and details presented in **the Volume 3's**. **Inclusion of the yield of residential units from zoned sites within the built-up footprint** would assist Development Plan monitoring on how each settlement is performing successfully under NPF and RSES compact growth objectives, including NPO 3 and RPO 35.
- b) **The Core Strategy table refers to "Brownfield 30%" plan as per the Draft Development Plan Guidelines.** Minimum Compact Growth targets of 50% for cities and suburbs and 30% for other settlements are contained in NPO 3 and *RPO 35: Support for Compact Growth*. Clarity on how these minimum Compact Growth targets will be achieved on this point is requested.
- c) The Planning Authority should reconsider the Core Strategy density approach to align with Section 3.9 of the RSES, RPO 31, and Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages). The Planning Authority should also demonstrate how the density assumptions for the Limerick City and Suburbs component of Clare align with the rest of the settlement.

### Recommendation 6: RSES Economic Principles

It is recommended that the Draft Plan economic strategy be reviewed to incorporate the 5 **principles of the Region's Economic Strategy** as set out in Chapter 5 of the RSES including Clustering, Capacity Building, Smart Specialisation and Knowledge Diffusion.

### Recommendation 7: Climate Action

- a) The transition to a low carbon economy can offer significant opportunities to achieve sectoral diversification, particularly for rural areas. It can also promote sustainable local development including building inclusive, climate resilient and energy efficient communities. It is recommended that this should be further explored in the Draft Plan by the inclusion of a section linking climate action, job creation and economic development. *RPO 56: Low Carbon Economy*, and Section 1 of Chapter 5 of the RSES is particularly relevant.
- b) Having regard to the important leadership role played by the local authority, the evolving and highly ambitious Climate Action legislative and policy platforms at national and EU level, the Planning Authority should strengthen the Climate Action policies and objectives. *RPO 163: Sustainable Mobility Targets* is particularly relevant in this regard as it calls for targets and actions which will help achieve higher performance in modal shift to sustainable mobility. In addition to addressing implementation and consistency with RPO: 163, the Planning Authority should consider how Climate Action targets could be applied to other areas of the Draft Plan.

### Recommendation 8: Sustainable Mobility and Transport

- a) It is considered that the incorporation of the provisions of Policy Objective 6 (b) and (d) of the Limerick-Shannon MASP into a specific objective, possibility Objective CDP11.3, would further strengthen the policy commitment to sustainable **transportation and enhanced alignment with Guiding Principle "Integrated transport and land use" as contained in Section 3.2 of the Limerick-Shannon MASP.**
- b) Further alignment with *Section 8.3: A Smart Metropolitan Area and Strengths in Attracting FDI* and Policy Objective 12 of the Limerick-Shannon MASP can be achieved by elaborating on the digital and Smart City opportunities for the Metropolitan Area as a whole. This will assist in developing a positive business ecosystem which is essential to the achieving the vision of the Limerick-Shannon MASP.

### Recommendation 9: Environment

- a) **It is recommended that reference to 'Green Infrastructure' is expanded to include 'Blue Green Infrastructure'. This will assist alignment with Section 3.2 Guiding Principles of the LSMASP, Chapter 5 of the RSES and RPO 123.**
- b) Having regard to *RPO 110: Ecosystem Services* of the RSES and NPO 58 of the NPF, the Planning Authority is requested to clarify how ecosystem services have been incorporated into the preparation of the Draft Plan.
- c) **The Planning Authority is requested to provide greater clarity in the Volume 3's in relation to flooding implications for land use zoning. Consideration should be given to overlaying relevant maps contained in the Strategic Flood Risk Assessment on the land use zoning maps.**