

Town & Country

RESOURCES LIMITED

PLANNING AND DEVELOPMENT CONSULTANTS

Senior Administrative Officer,
Planning Department,
Clare County Council,
New Road,
Ennis,
County Clare,
V95 DXP2.

24th March 2022

**Re: Draft Clare County Development Plan 2023-2029
Draft Stage Submission re Lands at Kilmore, County Clare**

Dear Sir/Madam,

Town & Country Resources Limited, Planning & Development Consultants, Hawthorn, Breskamore, Clarina, Limerick are instructed by John and Ann Clogan, [REDACTED] to make this submission in response to the Draft Clare County Development Plan 2023-2029, published by Clare County Council on 10th December 2021.

1.0 The Subject Lands

John & Ann Clogan own greenfield lands comprising 11.97 hectares approx. at Kilmore, County Clare, as indicated by red shading on Figure 1 below. There are 2 dwellings on the lands, occupied by members of the Clogan family.

The County Clare Settlement Hierarchy is outlined at section 3.4 of the Draft Plan. Clusters are the smallest type of settlement in the hierarchy. Kilmore, County Clare is designated as a 'Cluster', as shown on Map No. 144 of the Killaloe Municipal District Settlement Plans, see Figure 2 below.

Kilmore is situated to the north of Limerick, some 10km from the city centre, on the R465 Limerick – Broadford regional road. There is no particular village centre at Kilmore, the main focal point being St. Joseph's Church and adjacent Graveyard to the west of the R456. The southern extent of the Kilmore Cluster commences at the former Wuthering Heights public house, and it extends for some 400 metres to the north along the R465 encompassing St. Joseph's Church and its curtilage, and lands in active agricultural use to the west of the regional road. To the east of the R465, the boundary encompasses one-off detached dwellings.

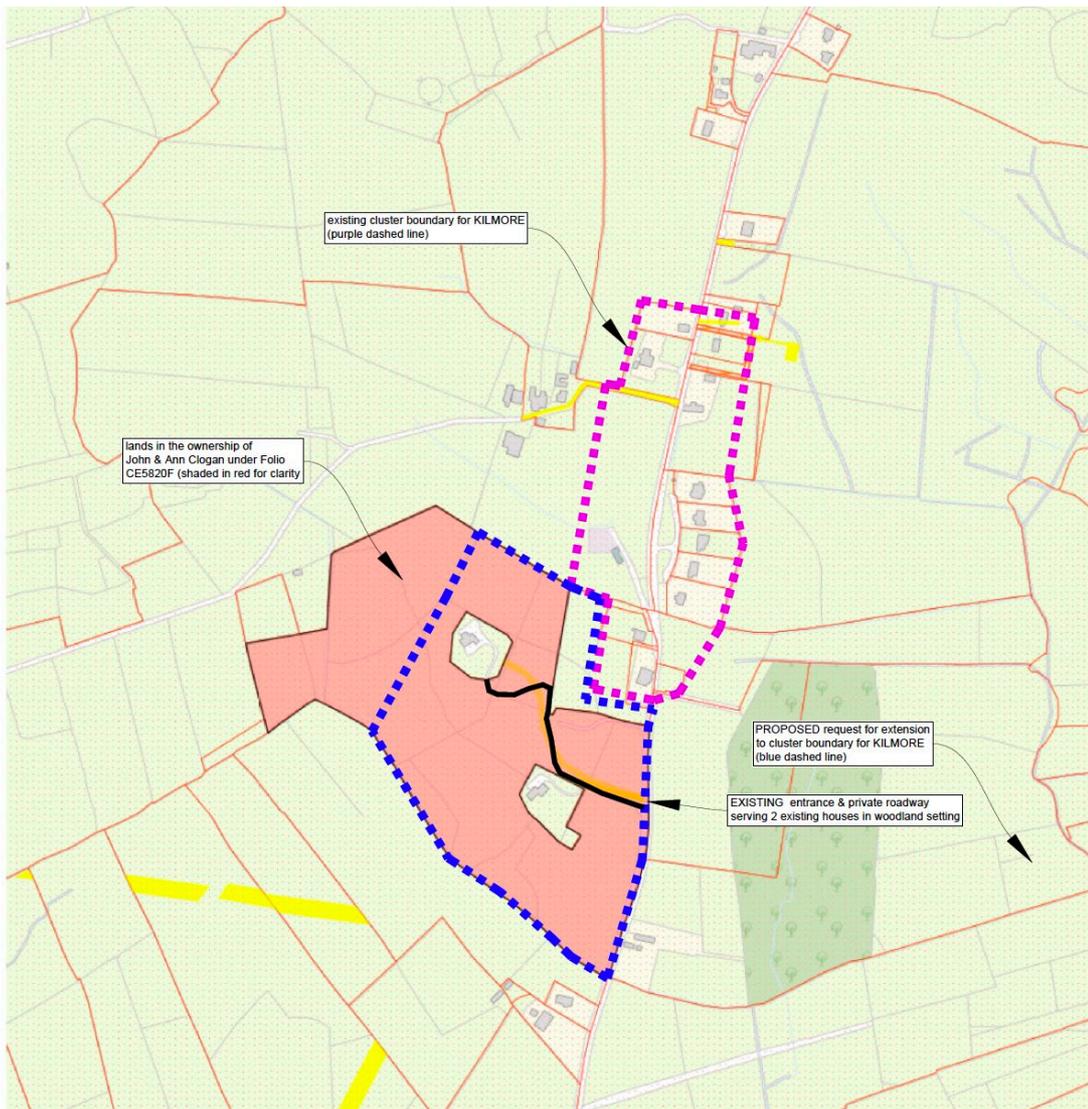


Figure 1 Subject Lands and Draft Kilmore Cluster Boundary

Section 4.2.2 of the Draft Development Plan notes that ‘Clusters’ are the smallest type of settlement in the hierarchy, and their character reflects traditional building patterns with a loose collection of rural dwellings clustered around one or more focal points. The Draft Plan states :

‘The strategy for these settlements is to facilitate a small number of additional dwellings and/or small enterprises to consolidate the existing pattern of development around the focal points and utilise existing services in the area.’

To confirm the Planning Authority’s intention for the future development of the Clusters across the County, Objective CDP 4.9 states :

*‘It is an objective of Clare County Council :
To ensure that clusters throughout the County maintain their existing character providing only for very small scale growth of dwellings and/or small*

enterprises where they can be suitably integrated with respect to setting and context.

Each cluster in County Clare is allocated a boundary, within which small scale growth of dwellings and/or enterprises is given positive consideration by the Planning Authority. This submission requests Clare County Council to amend the Kilmore Cluster Boundary, as shown on Figure 1 above.

2.0 Grounds for Alteration of Kilmore Cluster Boundary

2.1 Demand for Rural Housing in the Area

There is increasing demand for sites for one-off housing in the rural hinterland of Kilmore. This is confirmed by the landowners, who have been approached on several occasions by people wishing to purchase sites on their lands in order to build their family home. However, there are no sites for sale in the Kilmore Cluster, and therefore no prospect that demand can be met in the short-medium term. This situation is hindering the consolidation and sustainable growth of the rural community of Kilmore.

2.2 Kilmore Sequential Test

Having regard to the extent of demand locally for sites for residential purposes, we have undertaken a close review of the current cluster boundary in order to establish if there are any sites within the boundary that can respond to the development plan objective for the cluster and therefore accommodate demand for new residential accommodation or small scale enterprise development over the lifetime of the new county development plan.

Figure 2 below presents a sequential test of the vacant sites in Kilmore and the likelihood of these sites coming forward to the planning process over the new plan lifetime. Information for this assessment is gathered from local knowledge and from the online land directory, Land Direct.ie.

A cursory glance at the cluster boundary map might suggest that there are good opportunities for new development on vacant lands to the east and west of the R465 in Kilmore. However, closer scrutiny of the boundary, combined with a review of the planning register and local knowledge confirms that there is just one vacant site in Kilmore, which is to the south of and to the rear of an existing dwelling. We submit that this site will not meet the level of demand for new residential accommodation for the local community of Kilmore and its rural hinterland, over the lifetime of the new Development Plan.

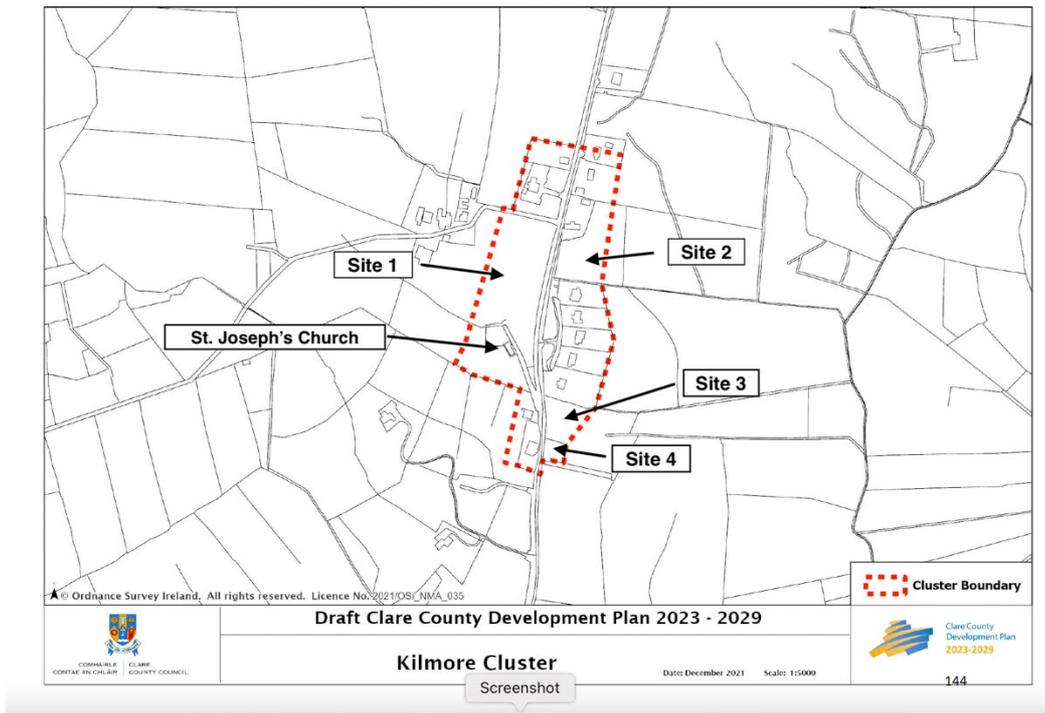


Figure 2 Sequential Test, Kilmore

Site 1 Agricultural Lands, west of R465

The owner of the lands has been approached by prospective purchasers, but does not wish to sell and does not intend to sell. This land is in active agricultural use and is being reserved in the long-term for sites for immediate family members.

Site 2 – Adjacent Existing 2-Storey Dwelling, east of R465

The owner of the lands resides adjacent to this site. They do not have a need to build on the lands currently. There is potential that in the future, a family member may build their own home on the site. There is no certainty that this site will come forward to the planning process over the life-time of the new Development Plan.

Site 3 – Under Construction, Planning Register Reference 21186

Permission for a dwelling house, garage, entrance, wastewater treatment plant.

Site 4 – Under Construction, Planning Register Reference

Permission for a dwelling house, garage, entrance, wastewater treatment plant.

2.3 Alternative Cluster Boundary

In this context, we request the Planning Authority to refer to the lands outlined in Figure 3 below in the context of the Kilmore Cluster and we request the Planning Authority to revise the cluster boundary to encompass these lands. The new Cluster boundary now requested is as shown on Figure 1. The alternative cluster boundary presented in this submission encompasses the village focal point at St. Joseph’s Church, but now extends to the south of the village, rather than to the north, in order to encompass lands that are available for development in the short-term.

A small-scale cluster housing scheme of 6 houses on lands to the south of Kilmore is shown on Figure 3, for the information of the Planning Authority. This scheme benefits from an established entrance and service road on the R465.

There are no Natura 2000 sites on or immediately adjacent to the subject lands and the lands do not overlap with the boundaries of any proposed Natural Heritage Area. No part of the lands are located within or close to an identified zone of archaeological potential or architectural interest. The subject lands do not include any protected structures and are not situated within an Architectural Conservation Area. The lands do not contain and are not bounded by any protected trees.

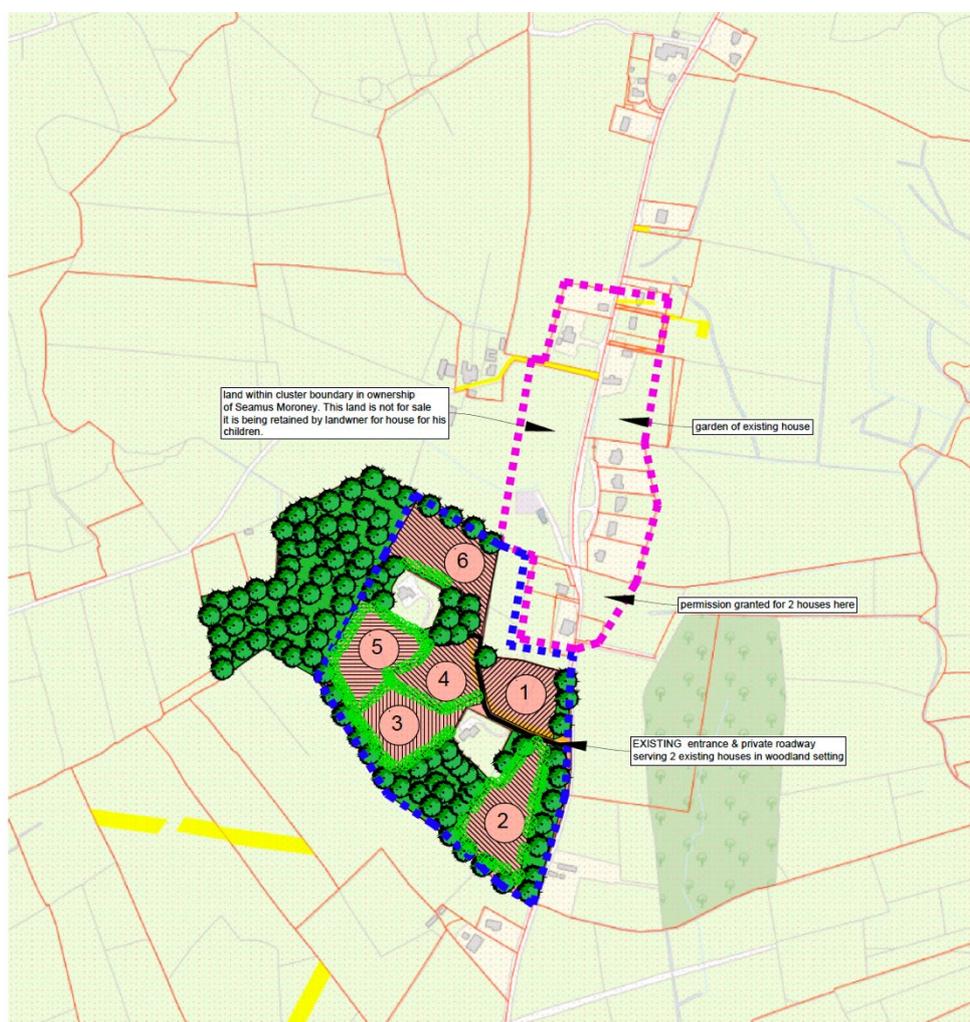


Figure 3 Site Layout Plan and Revised Cluster Boundary

2.4 Site Layout Plan Key Development Principles

A series of development principles would underpin development of the rural cluster at Kilmore, as follows :

- The low-density cluster housing scheme would be planned and designed as a complete development, but could be developed on a phased basis, with one or a number of units built at any one time.
- Scheme density, plot areas, site-subdivision and dwelling scale to be influenced by natural site features and established through the planning process.
- Given the elevated nature of the lands, an assessment of site topography to provide for maintaining existing site levels where possible and maintaining the natural landscape as a backdrop on all sites, and natural features, eg mature hedgerows and trees. This will also allow for shelter from prevailing winds.
- A design statement shall be prepared to assist future home owners in designing their own homes.
- As Kilmore is not serviced by a public wastewater treatment plant, individual on-site septic tanks or proprietary treatment systems will be required, to be designed, constructed and maintained in accordance with the 'EPA Code of Practice Wastewater Treatment and Disposal Systems for Single Houses', in place at the time of the planning application.

2.5 Justification for Alteration of Kilmore Cluster Boundary

The former Wuthering Heights pub has been closed for a number of years. This was once a vibrant business serving a strong local community. It served as the heart of a community and a meeting place for locals, and its absence has been felt in the continued lack of an important meeting place. The cluster exists from a planning perspective in the first instance to create a node within a rural hinterland. With the sustainable development of a rural housing scheme as outlined in this submission, the cluster at Kilmore has the potential to generate viability for the public house business once more by providing a local and important catchment area adjacent to the village. This would not only be a focal point of the cluster but it would also provide employment, opportunity for the public house to grow commercially ,and become an amenity for the cluster once more. Nearby in Broadford, we have seen the demand for café/restaurant services within the village, and the public house at Kilmore could also provide services similar in nature to the cluster community if the demand was there.

Similarly, Kilmore Church has been a very important gathering place for the community of Kilmore over a number of decades. The services have been cut in recent years which continues to dilute the cluster at Kilmore. Expanding the cluster will allow the potential for the Church to once again open its doors regularly and serve the community. Currently, the community

will sometimes meet at the Church should the need arise to bring people together to discuss community issues. This further demonstrates the lack of a viable focal point within the cluster. Allowing sustainable growth of the cluster will help to counteract this.

There is significant demand for housing in the nearby townlands of Clonlara, Killaloe, Broadford, Parteen and Ardnacrusha. A cursory look at planning applications, including refusals and approvals, around those townlands clearly depicts this demand. There have been discussions within the community of Ardnacrusha regarding the need for a school to meet the significant demands of that community, which coincides with the large population growth of that area. Kilmore is strategically located within 2 miles of Ardnacrusha, 2 miles of Clonlara, 5 miles of Broadford, 10 miles of Killaloe. All of these areas have seen large growths in population over the past number of years. Kilmore (inclusive of Aherinabeg and Aherinamore) has seen 25 planning applications in the last 4 to 5 years. The expanded Kilmore cluster has the potential to meet some of this overspilling demand that has been clearly present in the wider area for some time and continues to grow. Meeting some of this demand by providing an expanded cluster at Kilmore provides numerous benefits to the immediate and wider area by promoting cluster development.

The proposed Wind Farm development in Formoyle, Kilmore is yet another contributory factor to the need for housing on the R465. This development will undoubtedly require a housing need to be met through its construction phase but also through the ongoing operation of the Wind Farm. The plans for the expansion of the University of Limerick to the Clare side and the construction of the Coonagh to Knockalisheen Distributor Road will bring much greater connectivity to the north-Limerick/south-Clare area. The demand for housing in the area due to all of these factors is undoubtedly present and is continuing to rise significantly. The Kilmore cluster cannot meet any forthcoming demand currently and the proposal to expand the perimeter seems a logical response to a growing need in the area.

2.6 Conclusion

This submission sets out a justification for the inclusion of lands within the Kilmore Cluster. The vitality and vibrancy of the county's villages is dependent on people continuing to live and work within them. A low density residential development proposal at the subject lands is an appropriate response to the need to accommodate those wishing to settle in the rural area, whilst also contributing to the growth of the village. We submit that this scheme would meet demand for new one-off housing in the immediate hinterland and could facilitate growth and development of the village at a scale that is appropriate to the role of Kilmore in the settlement hierarchy.

In conclusion, the landowners formally submit the following request :

That Clare County Council amend the Draft Clare County Development Plan 2023-2029 to change the boundary of the Kilmore Cluster as shown on Figure 1 of this submission.

We trust that the points raised in the submission will be taken into account by Clare County Council in its review of the Draft Clare County Development Plan 2023-2029, and we look forward to further consultation with the Planning Authority in relation to this matter, in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. McDonogh', with a long horizontal flourish extending to the right.

Dianne McDonogh
Town & Country Resources Limited
Planning & Development Consultants