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CUNNANE STRATTON REYNOLDS

Planning Department,
Clare County Council,
New Road,
Ennis,
Co Clare.
V95 DXP2

28th March 2022

Online Submission

Re: Submission on the Clare Draft County Development Plan 2023-2029 for Lands at Killaloe Designated as TOU2

Dear Sir / Madam

We make this submission on behalf of Mr. Michael McHale, Killaloe, Co. Clare on the Clare Draft County Development Plan 2023 - 2029 as it referred to lands designated TOU2 on the Killaloe zoning map for Killaloe, Co. Clare contained within Appendix 3 of the emerging Plan.

We request that the Council consider rezoning approx. 10 acres adjacent to the northern side of the site of these lands zoned TOU2, for conventional residential uses.

This would:

- Allow for continuous use of the site outside the seasonal period to which a single tourism activity would operate.
- Allow a transition of uses across the site from the established town to the tourism facilities that may be developed to the south.
- Support commercially the development of the overall site for tourism related uses.

We submit that despite the general economic recovery, challenging economic conditions still exist and a mix of uses on the lands will enhance the overall benefit to the local economy.

Pages 20 & 21 of Volume 3 of the Draft Plan states that infrastructural constraints are going to be alleviated or resolved over the short term and likely within the 6-year period following adoption of the emerging plan:

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'Wastewater from Killaloe is treated in Ballina and the existing wastewater treatment plant is currently operating at hydraulic capacity and cannot accommodate any further significant development. The planned upgrade of the Ballina WWTP is scheduled for completion in 2024 as set out in the Irish Water Capital Investment Programme. Until such time as the upgrade has been undertaken any future residential development is constrained. (underlining is our emphasis).

Killaloe and Ballina suffer from significant traffic congestion on the old bridge. A new Shannon river crossing, Killaloe by-pass and upgrade of the R494 was approved by An Bord Pleanala in 2012 to alleviate this problem. Advance works have now started on the project and the main construction period is expected to take approx. 3 years to complete. This Plan provides an Infrastructure Safeguard for the approved route of both the by-pass and the new river crossing. Completion of this project will transform Killaloe and Ballina by reducing travel time, improving the flow of traffic, reducing noise and pollution, improving environmental quality and providing opportunities for enhanced access. (Underlining is our emphasis)

The infrastructure and traffic management upgrades will provide considerable scope for future development in both settlements to meet the needs of current and future residents. Such development will include residential, community and employment-generating use to ensure the sustained future growth of the linked settlements. The By-pass also presents an opportunity to revitalise and reconnect the town by re-imagining public spaces and connecting key landmarks with a strong focus on the pedestrian and cycle environment

The above provisions clearly indicate that lands can and have been zoned in Killaloe with infrastructure constraints in place. The proposed residential lands have the capacity to assist development of tourism as envisaged within the TOU 2 lands. A range of uses and activities in this location will make for more sustainable development where the principle of development has already been accepted on the other side of the bypass. Opportunities for uses to be cross financing or cross subsidising will be promoted if 10 acres are zoned as requested on the northern extremity of the TOU 2 lands. Consolidation of services and infrastructure can also be achieved subject to appropriate statutory approvals.

The town has been designated in Chapter 3 of the Draft County Development Plan (the "Core Strategy Chapter as a "Small Town". The Goal of the Core strategy for Clare is:

Goal 1: *A County Clare that drives local and regional sustainable growth by harnessing the potential of its unique location, quality of life, natural resources and other competitive advantages.*

Demand for single rural housing may be reduced if sufficient supply of attractive and affordable homes in rural towns and villages is available. We suggest the provision of residential land in this area will increase housing supply and choice, thereby reducing the demand for single rural dwellings. We believe this location close to the town centre with capacity for mixed development will offer a controlled and sustainable option to those who do not meet rural housing needs criteria in Killaloe.

Section 5.2.7 of the Draft Development Plan relates to Sites for Independent Development. The Council in this section state:

Sites for independent development allow applicants to design and build their own homes tailored to their specific needs within the towns and villages of the County and provide an alternative to single houses in rural areas. These sites provide opportunities for compact growth, placemaking and the development of housing in close proximity to amenities and services. Housing developments of this nature also have the potential to increase the number of people living in towns and villages across the County. The Council will require development proposals for 'sites for independent development' housing schemes to be accompanied by a detailed design brief setting out the parameters for architectural form, plot ratios, external finishes and boundary treatments.

The following objective CDP5.9 of the Draft Development Plan reflects and guides this type of development.

It is an objective of the Development Plan:

- a) To support the development of housing schemes of 'sites for independent development' in the settlements of County Clare on lands that have been zoned for residential or low density residential development or sites that have been designated as Village Growth Areas;*
- b) To prepare a guidance document on the preparation of housing schemes of 'sites for independent development' during the lifetime of this Plan*

Given the location and capacity for varied residential development at this site in a sustainable manner, we request the council consider the opportunities available in recognising the potential these lands offer to fulfilling overall housing delivery in the Killaloe area.

Table 3.4 of the Core Strategy Chapter allocates a proposed population increase of 148 persons for the period of the emerging 2023-2029 development plan for which the Council proposes an additional 77 housing units on 5.78ha. This is a relatively minor allocation inversely proportionate to the tourism potential of Killaloe. If tourism and leisure activities are to grow, then housing opportunity needs to grow with that otherwise there will be unsustainable levels of commuting and travel to the town and insufficient support to existing

services and amenities the viability for which must be questioned. In addition, it is projected that enhanced water and foul services will be available in the area by 2024.

Part 3.2 on Strategic Aims from the core strategy section of the Draft Development Plan says that the aims of the core strategy are:

- *To provide the policy framework for settlement plans and local area plans (LAPs), particularly in relation to land-use zoning, and to ensure a strategic approach to zoning that allows an appropriate level of development throughout the plan area.*
- *To set the context for the key infrastructure of the County and its role;*
- *To provide a framework within which the provision of sustainable infrastructure, amenities, economic investment and development can take place to maximise the use of resources in the County, for current and future generations;*

Our client's land is strategically located within the development boundary, near recreational amenities, key infrastructural services, and areas of economic opportunity allowing for a soft transition of development between the urban and rural areas as opposed to the current hard buffer set in place by the Killaloe bypass.

I trust that you will have regard to the above in your deliberations on the emerging plan.

We ask that we are included on any mailing list that is created to provide updated on the plan making process (ccostello@csrlandplan.ie).

We trust the above will be taken into account in your further deliberations on the emerging County Draft Development Plan.

If further elaboration is required, please do not hesitate to contact us.

Yours sincerely,

Cathal Costello

CUNNANE STRATTON REYNOLDS

LAND PLANNING & DESIGN

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