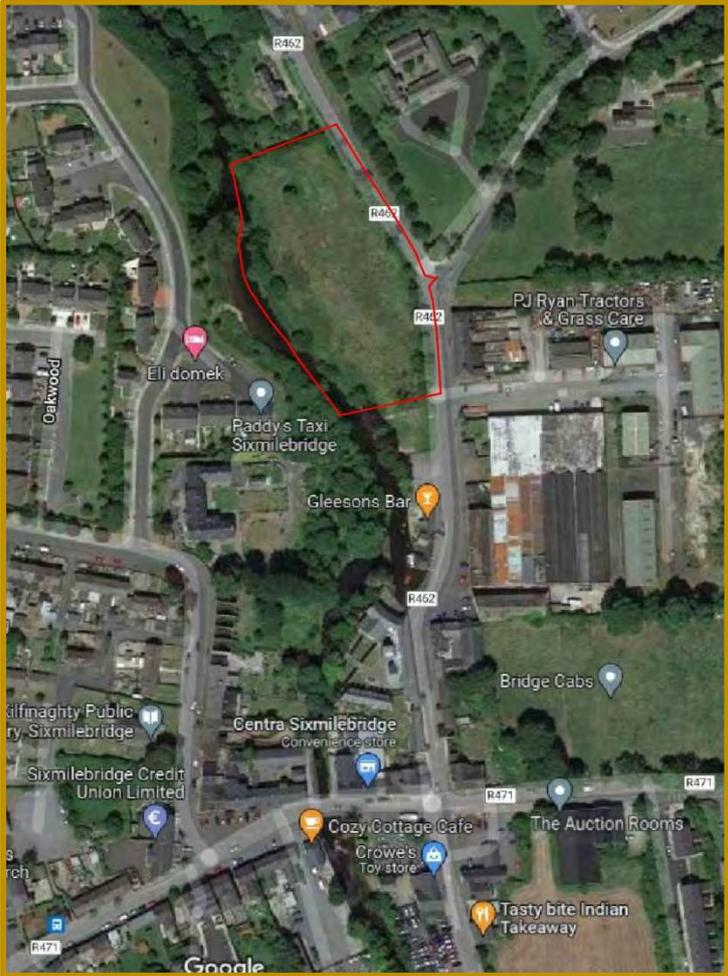




Chartered Engineers, Planning Consultants & Property Surveyors

# Submission to the Draft Clare County Development Plan 2023-2029



<b>Client</b>	Ruth Gleeson & Pat Monahan
<b>Project Title</b>	Lands at Iverstown, Sixmilebridge, Co. Clare.
<b>Project Number</b>	CDP/RG 010122
<b>Prepared by</b>	Brian Foudy & Associates LTD
<b>Date</b>	25th March 2022

## INTRODUCTION

We note that Clare County Council are in the review process of the existing Clare County Development Plan 2017-2023 and preparation of a new development plan for the period 2023 - 2029 is underway. On behalf of our client, we wish to make a submission in respect of the Stage 2 (Draft) of the Clare County Development Plan 2023-2029 (hereinafter referred to as the Draft Plan).

Brian Foudy & Associates Ltd have been appointed to prepare this submission on behalf of the above named clients. In response to the contents of the Draft Clare County Development Plan 2023-2029, and in particular Volume 3b - Shannon Municipal District, this submission will support the request for a change in zoning from Open Space to Residential in respect of lands located at Iverstown, Sixmilebridge, Co. Clare.

## SITE LOCATION:

The subject lands are located in within the settlement boundary of Sixmilebridge, on the R462. The subject lands have an area of approximately 0.91ha with approximately 140 metres of frontage onto the R462 Road. The lands are contained within Folio CE12862



Extract from Land Direct showing lands contained in Folio CE12862

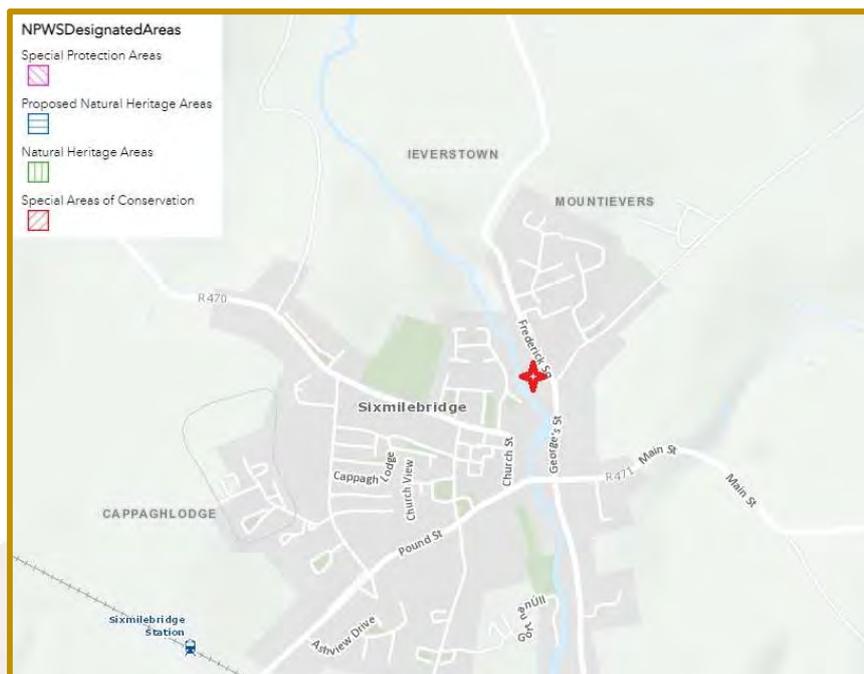
## SERVICES

- Sewers:** The Site is serviced by both Foul & Surface water sewer located in the R462 which runs the length of the Site to the East, There is capacity in the sewer network to accommodate a development as proposed on these lands.
- Water:** The Site as also serviced by an Irish Watermain connection located in the R462.
- Electricity:** Existing poles and ESB wires are adjacent to these lands.
- Telecoms:** Telecom poles and infrastructure currently exist adjacent to these lands.
- Public Lighting:** Public lighting poles and infrastructure currently exist on the footpath opposite the subject site.

## ENVIRONMENTAL

The Subject site is **not** within or close to;

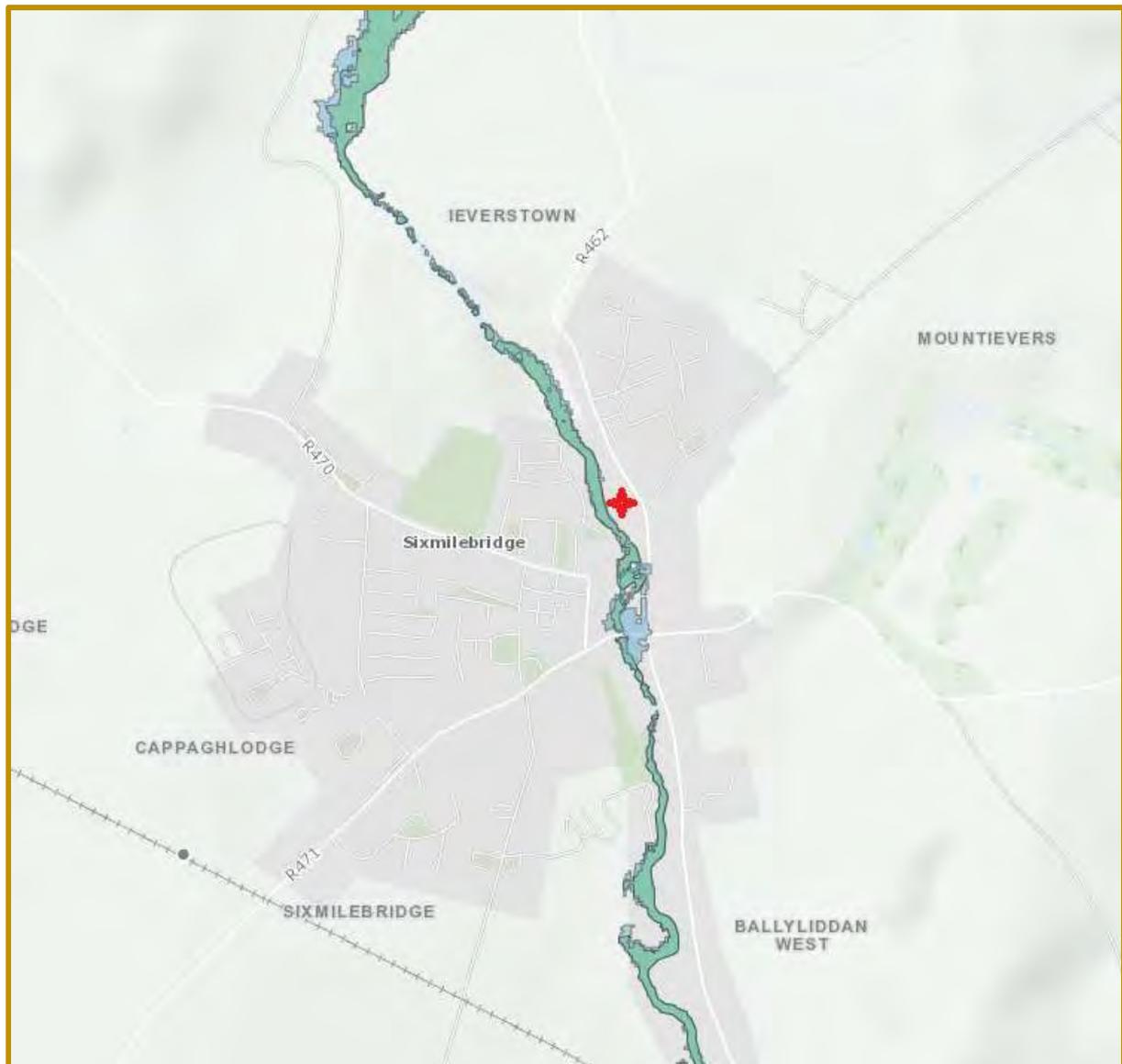
- Special Protection Areas (SPA)
- Proposed Natural Heritage Areas (pNHA)
- Natural Heritage Areas (NHA)
- Special Area of Conservation (SAC)



Extract from NPWS Protected Sites Maps \_ Subject Site Marked in **RED**

## Flood Risk

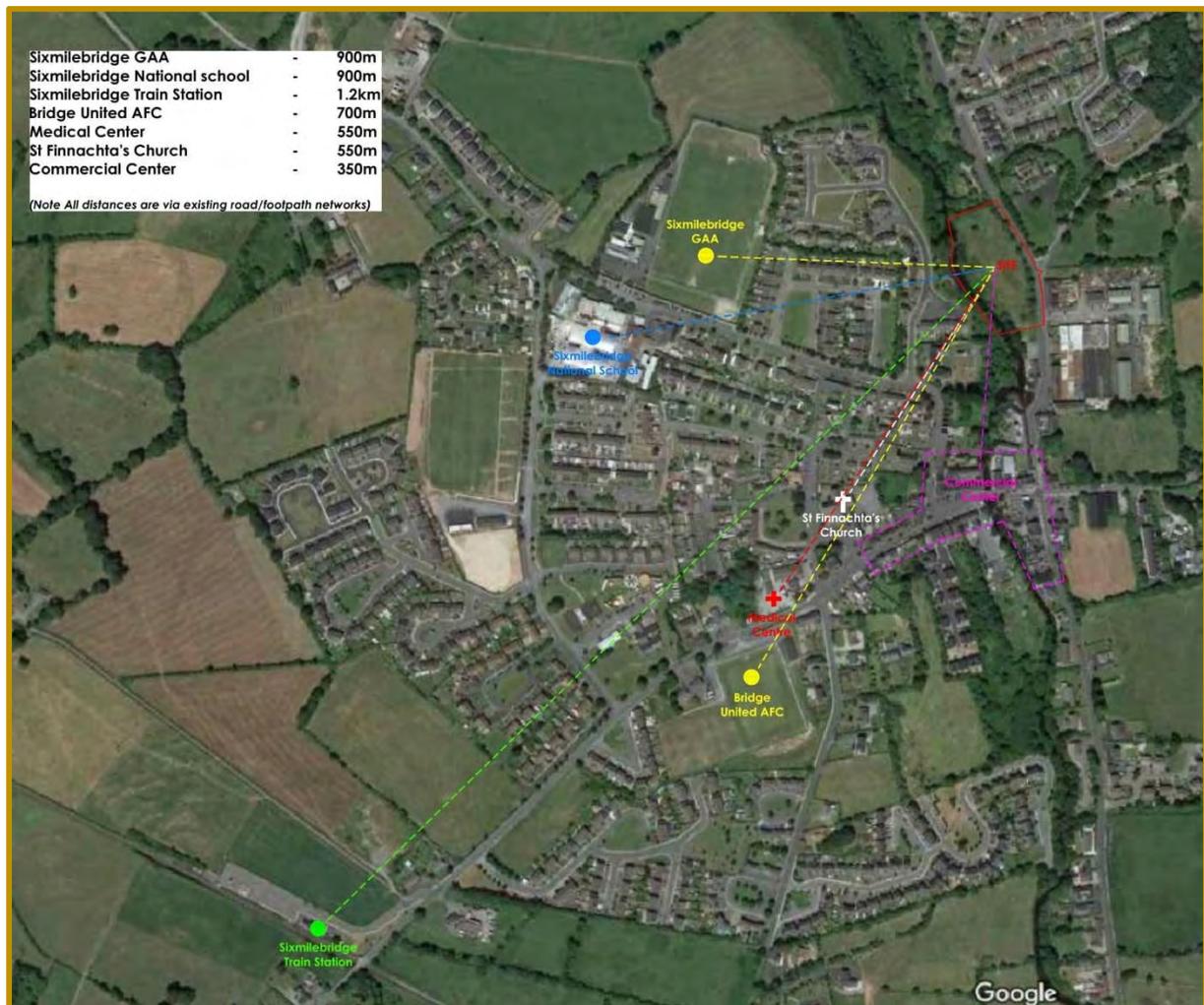
Although the subject site backs onto the Bunratty River, there is **no** flood risk in this area and the owner has confirmed that the subject land has **never** flooded.



Extract from Flood Maps \_ Subject Site Marked in **RED**

## CONNECTIVITY & COMMUNITY FACILITIES

The subject lands are located in close proximity to a wide variety of amenities and community facilities and the Figure below provides an illustration of this. There are a wide range of amenities and community facilities located within walking distance of the subject lands. These amenities and community facilities are listed below (*this list is not exhaustive*):



## PLANNING POLICY CONTEXT

This submission has been prepared with cognisance to the following planning policy documents.

- National Planning Framework: Project Ireland 2040
- Regional Spatial & Economic Strategy for the Southern Regional Assembly 2020-2032
- Clare County Development Plan 2017-2023 & Draft Clare County Development Plan 2023-2029



*Extract from Project Ireland 2040 – Clare is designated as within the southern region*

### **National Planning Framework: Project Ireland 2040**

In 2018, the Government of Ireland adopted the National Planning Framework (NPF) entitled Ireland 2040 to succeed the National Spatial Strategy. The NPF comprises the Government's proposed long-term strategic planning framework to guide national, regional and local planning and investment decisions over the next 25 years. It is intended that the NPF will be a strategic document that will provide the framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy. The NPF has a number of National Policy Objectives (NPOs) that articulate delivering on a compact urban growth programme and are relevant to the proposed rezoning of the subject lands. In the southern Region the targeted growth is 340,000 to 380,000 additional people by 2040. Sixmilebridge would be described as a small town within a Metropolitan Area. The following are some relevant National Policy Objectives;

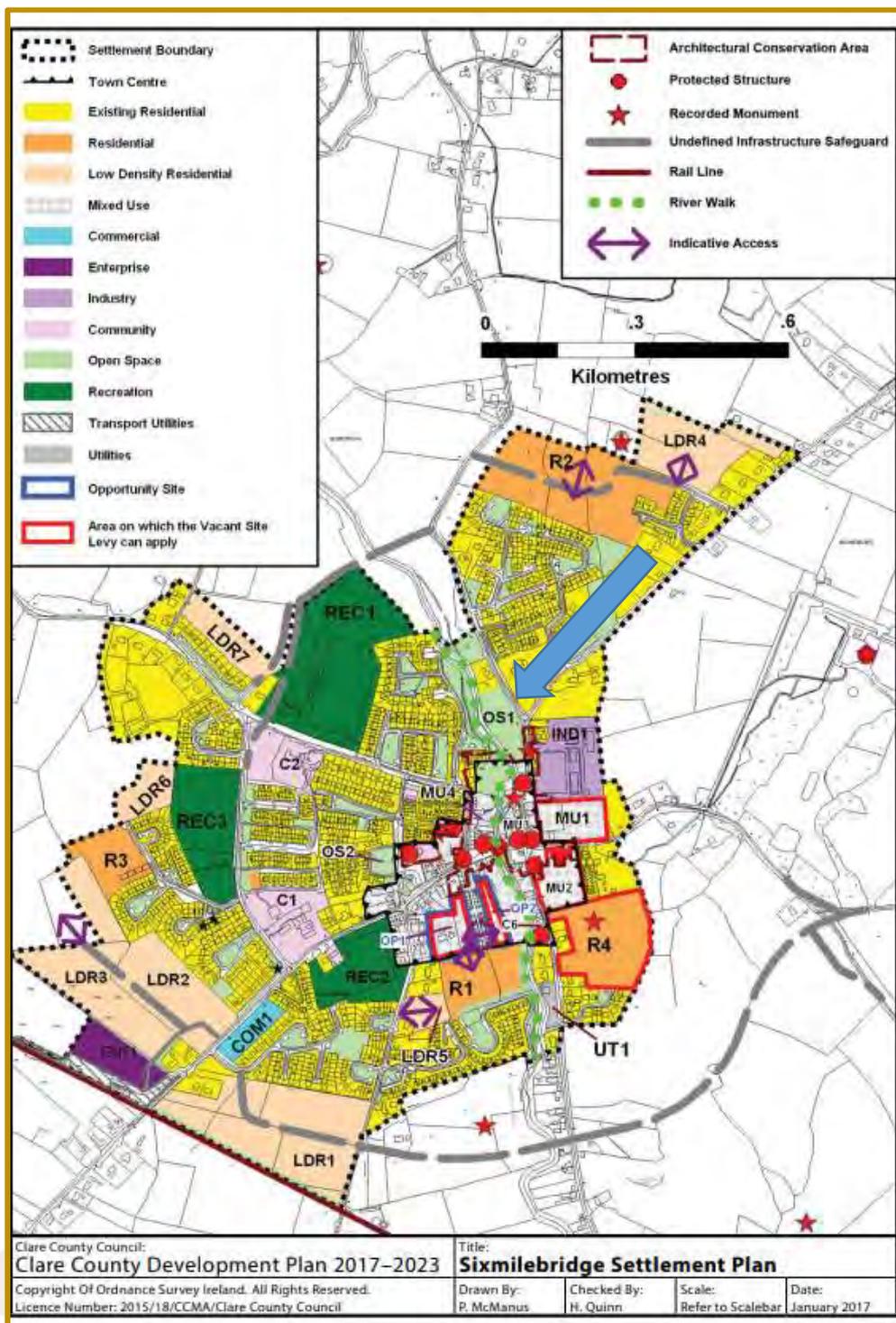
- NPO 3a deliver at least 40% of all new homes within the built-up footprint of existing settlements.
- NPO 4 relating to attractive, well-designed liveable neighbourhoods;
- NPO 5 relating to sufficient scale and quality of urban development;
- NPO 6 Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area
- NPO 11 In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth
- NPO 27 Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.
- NPO 33 prioritise provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location

### **Clare County Development Plan 2017-2023**

The subject lands are zoned as Open Space (OS1) in the current Sixmilebridge settlement Plan. Sixmilebridge is identified as a small town in the settlement Hierarchy. The objective for small towns is to ensure that their existing role is maintained and strengthened. This will be achieved through adequate zoning of lands and the promotion of appropriately scaled and well-designed urban development.

- **CDP 3.4** – Small Towns: To ensure that the small towns throughout the County continue to act as important local service centres that maintain sustainable

communities, help to ensure a good quality environment, provide public transport to the main centres, ensuring a high quality of life for those who live in the vicinity.



Existing Sixmilebridge Settlement Plan 2017 -2023

**Draft County Development Plan 2023 - 2029**

Based on the draft settlement plan, the subject lands are proposed to remain zoned “Open Space” within the town boundary. These lands are in private ownership and although submissions were made before the adoption of the existing development plan to have these lands rezoned to “Residential” the Council refused this request.

If this plan is adopted and the lands remain zoned as “Open Space”, it is our belief that the current zoned lands will not meet the targets set out in the proposed core strategy Table 3.4, the core strategy 2023-2029 having only allowed a population allocation of 357 for Sixmilebridge.

**CDP 4.6** Small towns:

a) To ensure that the small towns throughout the County continue to act as important local service centres that maintain sustainable communities, help to ensure a good quality environment, provide public transport to the main centres, and provide a high quality of life for those who live in the vicinity;

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

c) To ensure that future growth is incremental and balanced in nature, and is relative and appropriate to the scale, size and character of the small towns and to seek to achieve centre out compact growth;

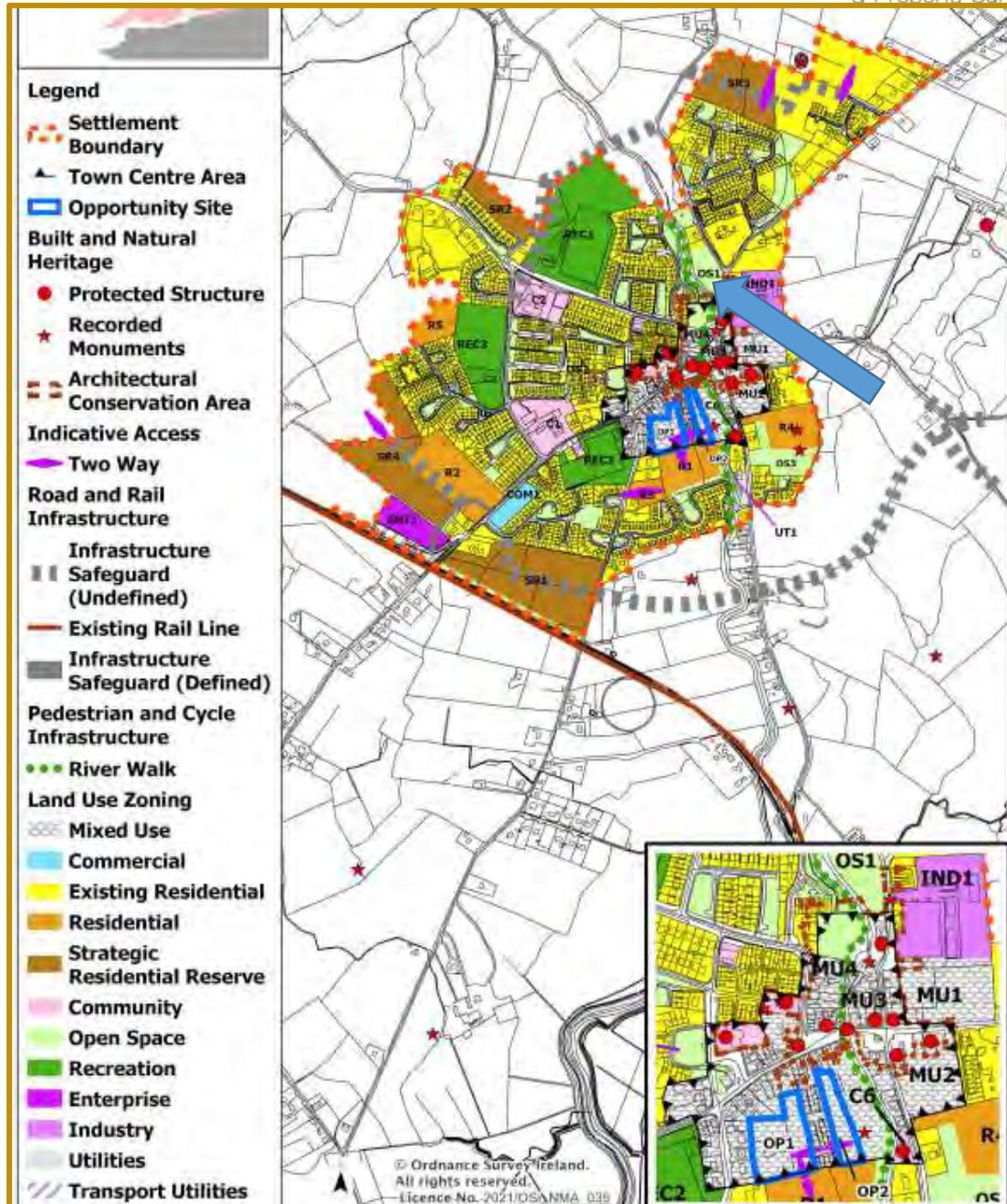
d) To seek investment in the sustainable development of a “New Homes in Small Towns and Villages” initiative in the County and the provision of services and serviced sites to create “build your own home” opportunities within the existing footprint of small towns; and

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

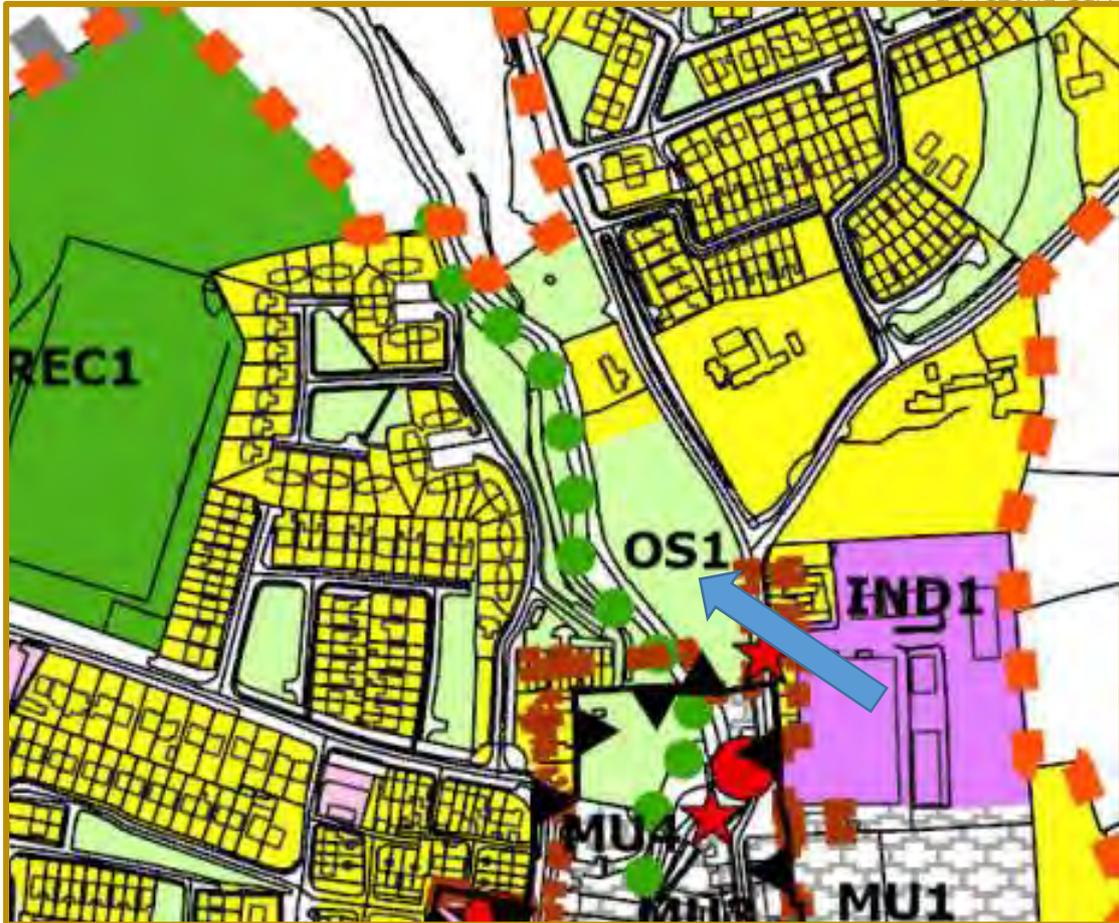
A few general objectives of the draft plan for Sixmilebridge as contained in Volume 3b is to:

- To support the role of Sixmilebridge within the Limerick Shannon Metropolitan Area in accordance with the Metropolitan Area Strategic Plan;
- To ensure that Sixmilebridge continues to act as an important local service centre that maintains a sustainable community, a good quality environment, providing public transport to key centres and a high quality of life for those who live in the town and its hinterland;

- To provide for zoning that will facilitate the sustainable expansion of the existing town centre and promote the development of residential lands to provide an appropriate mix of housing types and densities, together with complementary land uses such as community facilities and public transport facilities, to serve the current and future residential population of Sixmilebridge;
- To ensure that future growth is balanced and sustainable and is relative and appropriate to the scale, size and character of the existing town;



*In the Draft Clare County development it is proposed to zone the subject lands "Open Space-OS1"*



Extract from Draft Plan 2023 - 2029

### **CLARE COUNTY DEVELOPMENT PLAN 2023-2029 - OS1**

*This is an area straddling the O'Garney River to the north of the town centre, lying partly within the designated Architectural Conservation Area (ACA). The larger portion lies on the eastern riverbank and fronts Frederick Square/Kilmurry Road to the east. The southern section of OS1 lies wholly within the ACA and adjoins residential developments to the north and west. The low boundary treatment on the Kilmurry Road and the vegetation pattern within the area affords open views across the river and to the west. This area presents an opportunity for a riverside amenity park, providing an important recreational facility and contributes to the green infrastructure network. The creation of a footbridge linking the two open space areas on either side of the river, whilst being a feature, would facilitate pedestrian connectivity between the newer residential areas to the north and the established town centre and older residential areas to the south and west. The design and construction of any footbridge shall adhere to the guidance stipulated within "Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters" (IFI 2016) and "Guidelines for the crossing of watercourses during the construction of national road schemes" (TII 2008) or any subsequent updates.*

The draft plan has three different zonings for residential development for Sixmilebridge:

- Existing residential (yellow)
- Residential (orange)
- Strategic residential reserve (brown)

The draft plan omits Low Density Residential from the proposed Sixmilebridge Settlement Plan. We would propose to have these lands zoned as;

- **Low Density Residential**
- **Residential**
- If the above two are unsuccessful – **Strategic Residential Reserve**

#### **Low density residential:**

This zoning refers to the use of lands to accommodate a low-density pattern of residential development, primarily detached family dwellings. The underlying priority shall be to ensure that the character of the settlement/area is maintained and further reinforced by a high standard of design. Proposed developments must also be appropriate in scale and nature to the areas in which they are located.

#### **Residential:**

Residential use shall be taken to primarily include the use of land for domestic dwellings. It may also provide for a range of other uses particularly those that have the potential to foster the development of new residential communities e.g. schools, crèches and open spaces.

#### **Strategic Residential Reserve:**

It is acknowledged that not all lands within the settlement boundaries of the serviced settlements will be required to 2029. In these cases some lands have been included as a strategic residential reserve, where they comprise infill or contiguous sites or have a planning history of residential use and can form part of the long-term sequential expansion of the settlement where considered appropriate. In addition to protecting these lands for the long term expansion of these settlements, consideration may be given to the development of some of the strategic residential reserve before the end of the current plan period where the Planning Authority is satisfied that the development of zoned land is progressing faster than expected and a shortage of available lands may arise or residential zoned land may not be delivered as expected and a shortage may arise during the plan period. The development of such lands will only be considered from the beginning of year four of the Plan (April 2027) in order to give an opportunity for zoned land to be brought forward for development, and where it can be clearly demonstrated to the satisfaction of the planning authority that a zoned parcel of land will not be brought forward for development due to infrastructural or other demonstrable constraints during the remaining period of the Plan. It will also be a requirement that the proposed strategic residential reserve lands can be serviced and offer a reasonable substitute in terms of being delivered within the lifetime of the plan and are sequential development with good connectivity and access to services and amenity.

## PLANNING HISTORY

### County Development Submissions:

A Submission was made to Clare County Council to have these lands zoned residential/commercial for the existing Development Plan (2017-2023).

*Based on a review of ePlan, No previous application appear to have been lodged on these lands.*

## CONCLUSION

In summary, the main considerations for the proposed rezoning of the subject lands from 'Open Space' to 'Residential' are as follows:

- The subject lands are located within the settlement boundary of Sixmilebridge.
- There is a significant shortage of houses in Sixmilebridge, By zoning these lands as proposed, the site could easily accommodate approximately **10 new dwellinghouses**. See design proposal attached.
- The zoning of this site would help meet the zoning objectives of National Planning Framework: Project Ireland 2040, Regional Spatial & Economic Strategy for the Southern Regional Assembly 2020- 2032 and & Draft Clare County Development Plan 2023-2029
- There are several significant established multi-unit residential developments in the vicinity.
- Road infrastructure and potential vehicular access locations are satisfactory and would accord with relevant development plan provisions such as sight distances etc.
- The lands benefit from excellent pedestrian connectivity to the surrounding area.
- There are a range of amenities and community facilities located within easy walking distance of the subject lands.
- The lands benefit from proximity to services i.e. Water, ESB, Telecoms and Sewer.
- Residential development at this location will consolidate existing residential development in the area and help contribute to the compact growth of Sixmilebridge.
- These lands will not be developed into Open Space while in "Private Ownership". It is misguided to zone lands suitable for development as "Open Space" especially when the subject lands are not in the Councils ownership.
- The amenity as envisaged by the council for these lands will not materialise and continue to be unusable by the public if zoned as Open Space.
- Our clients would be willing to engage with the council to establish pedestrian connectivity via the subject site using a footbridge if residential zoning is adopted for these lands in the 2023 – 2029 County Development Plan.

We trust that the above submission will be given due consideration in the preparation of the Clare County Development Plan 2023-2029 and we look forward to the rezoning of these lands to residential.

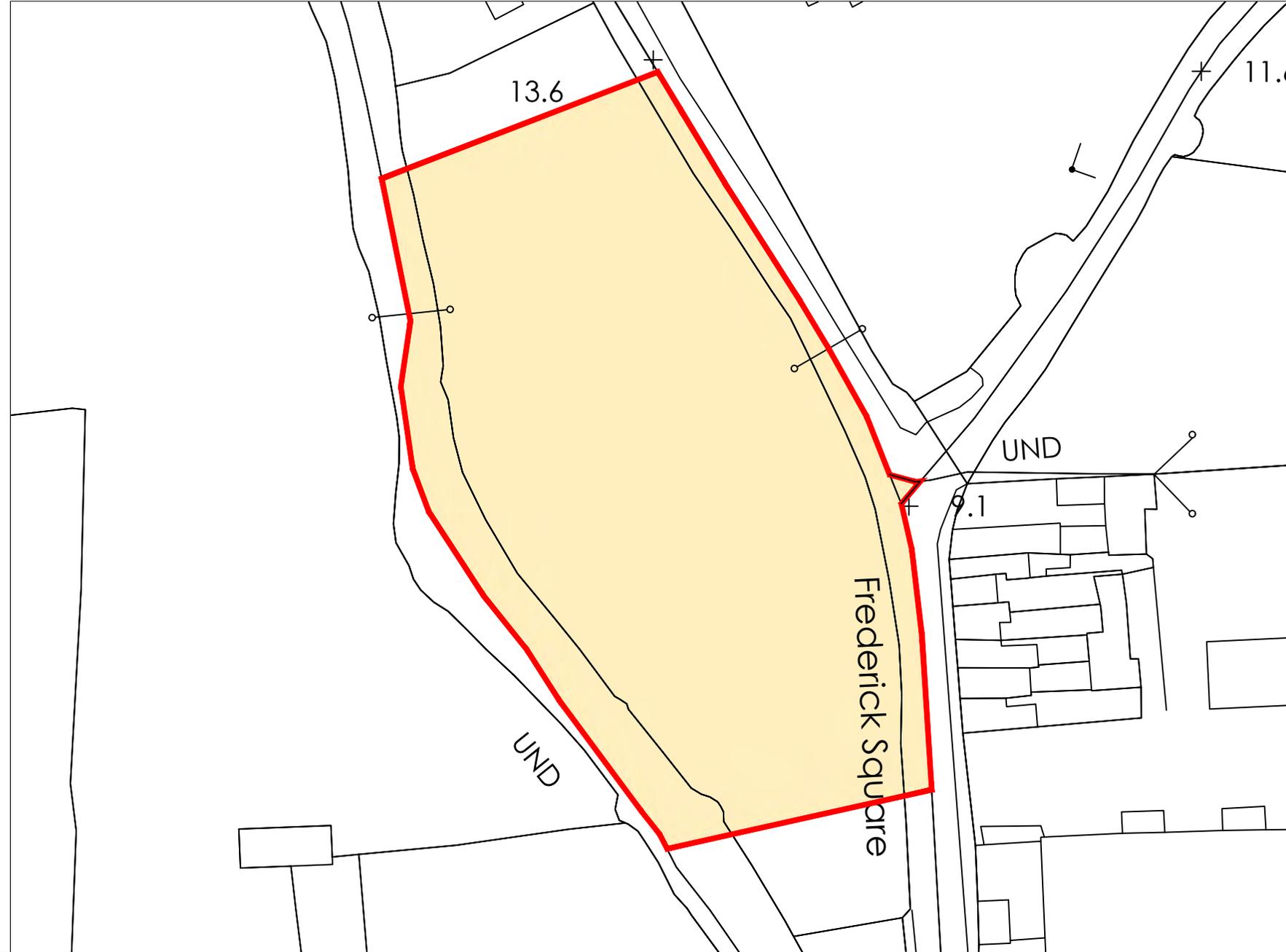
**Signed:**



**Brian Foudy**  
**B.E. C.Eng. MIEI.**  
**Chartered Engineer,**  
**Dip E.I.A & S.E.A Mgt**  
**Approved Site Assessor**

# ZONING SUBMISSION

147955mE, 166230mN



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 Site to which this  
application refers  
outlined in **RED**



Map Series: 1:2500      Map Sheets: 4500-D

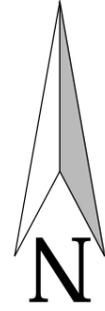
Output Scale: 1:1,000



147722mE, 166058mN

This Map is based on National Grid

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**SITE LAYOUT PLAN**  
Scale 1:500

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Client: **RUTH GLEESON**  
Address: Sixmilebridge, Co. Clare  
Title: **ZONING SUBMISSION  
PROPOSED SITE LAYOUT PLAN**

Scale	1:500 @ A3
Stage/Drawn	ZONING
Check	M.D.
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