

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

Client	The O'Neill Family
Project Title	Lands at Gowlaun, Lisdoonvarna, Co. Clare
Project Number	CDP/GON 010122
Prepared by	Brian Foudy & Associates Ltd
Dated	25/03/2022

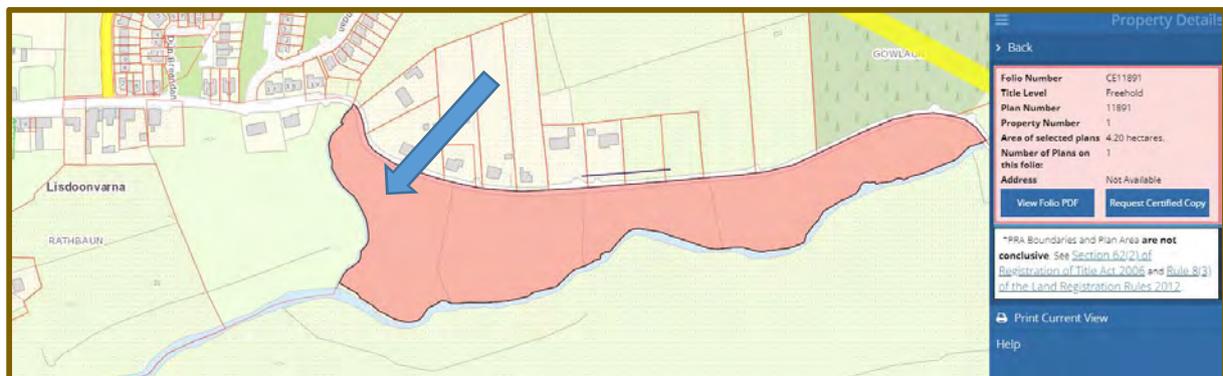
## INTRODUCTION

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 Development Plan) 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 O'Neill Family. In response to the contents of the Draft Clare County Development Plan 2023 - 2029, and in particular Volume 3d – West Clare Municipal District Shannon Municipal District, this submission will support the request for to retain the existing Low Density Residential Zoning on lands located at Gowlan, Lisdoonvarna, Co. Clare.

## SITE LOCATION:

The subject lands are located within the current settlement boundary of Lisdoonvarna along St Brendan's Road in the townland of Gowlaun, The lands have an area of approximately 0.565 ha currently zoned as low density residential with approximately 120 metres of frontage onto the local road. The lands are contained within Folio CE11891.



Extract From Land Registry – Folio CE11891

## SERVICES:

### Sewers:

These lands can be serviced by an Irish Water foul sewer which is located on St Brendans Road. There is ample capacity in the Lisdoonvarna sewer network and the waste water treatment plant to accommodate development on these lands. The Lisdoonvarna W.W.T.P is running at approximately 50% capacity. A foul sewer pump station exists across the road to the north of the subject lands

### Water:

These lands can be served by the Irish Water main supply which is laid along St Brendans Road.

### Electricity:

Existing poles and ESB wires are adjacent to these lands.

### Telecoms

Telecom poles and infrastructure currently exist at both sides of these lands

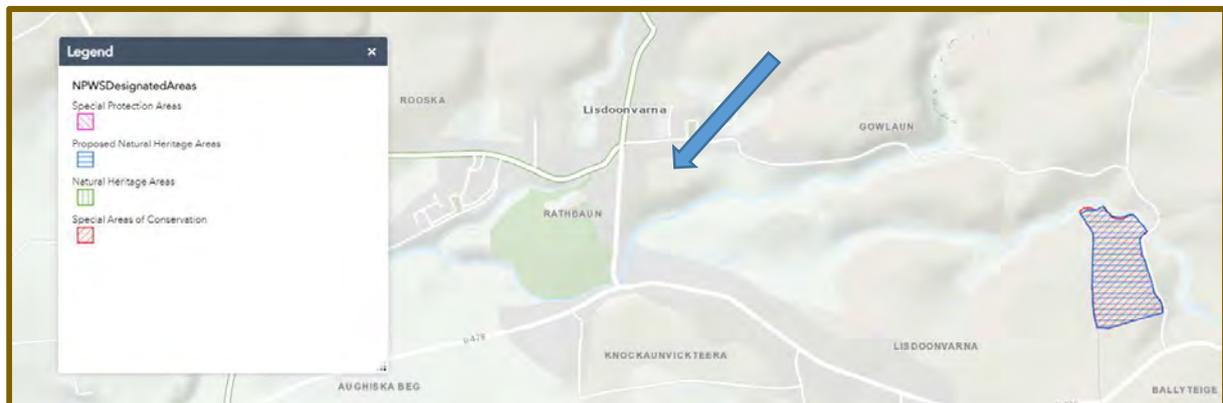
### Public Lighting

Public lighting currently exists as far as the bridge to the North of the subject lands, this could easily be extended.

## ENVIRONMENTAL:

The Subject site is **not** within or close to any of the below protected areas;

- 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 lands are close to the Gowlaun River to the south and a stream to the West, The existing zoned section is elevated above both the river and stream and does not flood. Flood risk is not an issue on these lands.



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 in the town of Lisdoonvarna such as Shops, Restaurants, Hotels, Church, Creche, National School, Secondary School, Chemist, Community Centre, Spa Wells and GAA Field all within walking distance of the subject lands. The existing public footpath is less than 30m from the subject lands and can easily be extended.

### **PLANNING POLICY CONTEXT:**

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

- National Planning Framework: Project Ireland 2040
- 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**

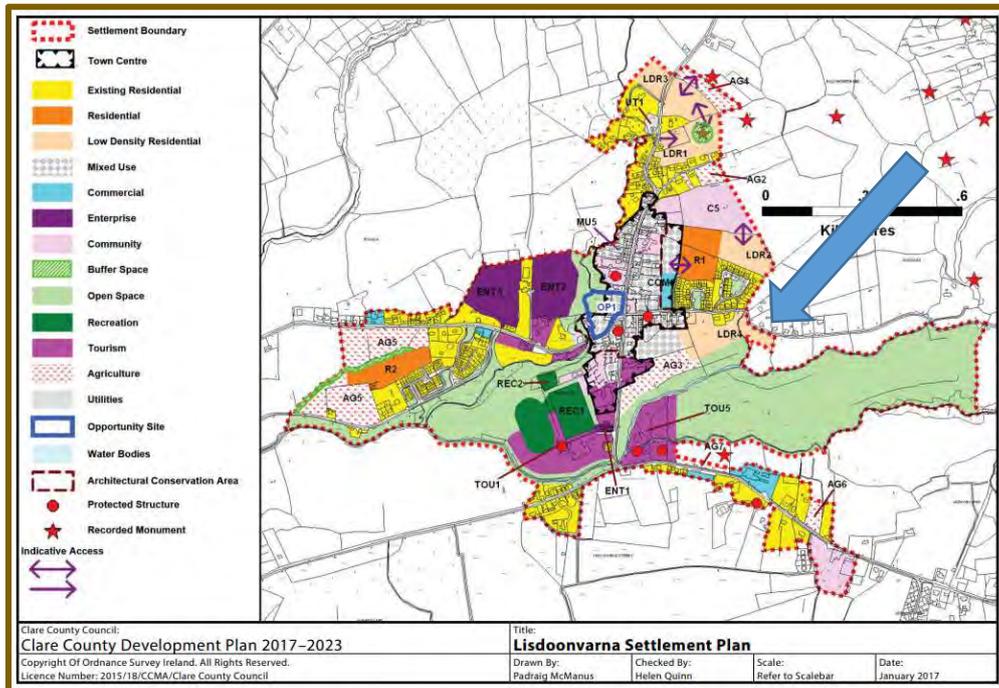
In 2018, the Government of Ireland adopted the National Planning Framework (NPF) entitled Ireland 2040 to succeed the National Spatial Strategy. The NPF comprises the Government's proposed long-term strategic planning framework to guide national, regional and local planning and investment decisions over 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. Lisdoonvarna would be described as a small rural town within this region. 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. The subject lands are within the current settlement plan of Lisdoonvarna.
- NPO 4 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being. This can be achieved on the subject lands. Lisdoonvarna has for many years taken in refugees in the direct provision centre (King Thomond) and more recently a significant number of Ukrainians fleeing the invasion of their country have sought refuge in Lisdoonvarna.
- NPO15: Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.
- NPO 18a: Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.
- NPO 18b: Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.
- NPO 33 prioritise provision of new homes at locations that can support sustainable

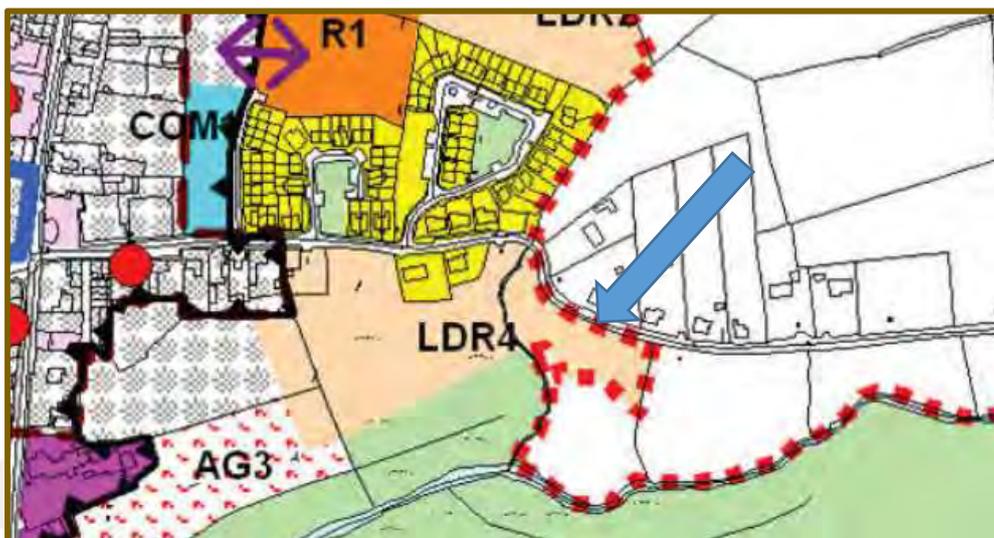
### **Clare County Development Plan 2017-2023**

The subject lands are zoned as Low Density Residential (LDR 4) in the current Lisdoonvarna settlement Plan. Lisdoonvarna 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 Lisdoonvarna Settlement Plan 2017-2023



Extract of Existing Lisdoonvarna Settlement Plan 2017-2023

### **Draft County Development Plan 2023 - 2029**

Based on the draft settlement plan, the proposed town boundary has been reduced and the subject lands are now shown outside the town boundary in open countryside. If this plan is adopted the lands will be de-zoned. In the core strategy Table 3.4, The core strategy 2023-2029 has only allowed a population allocation of 85 for Lisdoonvarna.

#### **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 Lisdoonvarna as contained in Volume 3d is to:

- To make provision for the sustainable growth of the town which will support existing services and encourage further expansion of the service base, whilst retaining its distinctive character.
- To support the provision of infrastructure to allow for future growth.
- To provide for the growth and diversification of the local economy including the promotion of the town as a base for visitors wishing to explore the Wild Atlantic Way.

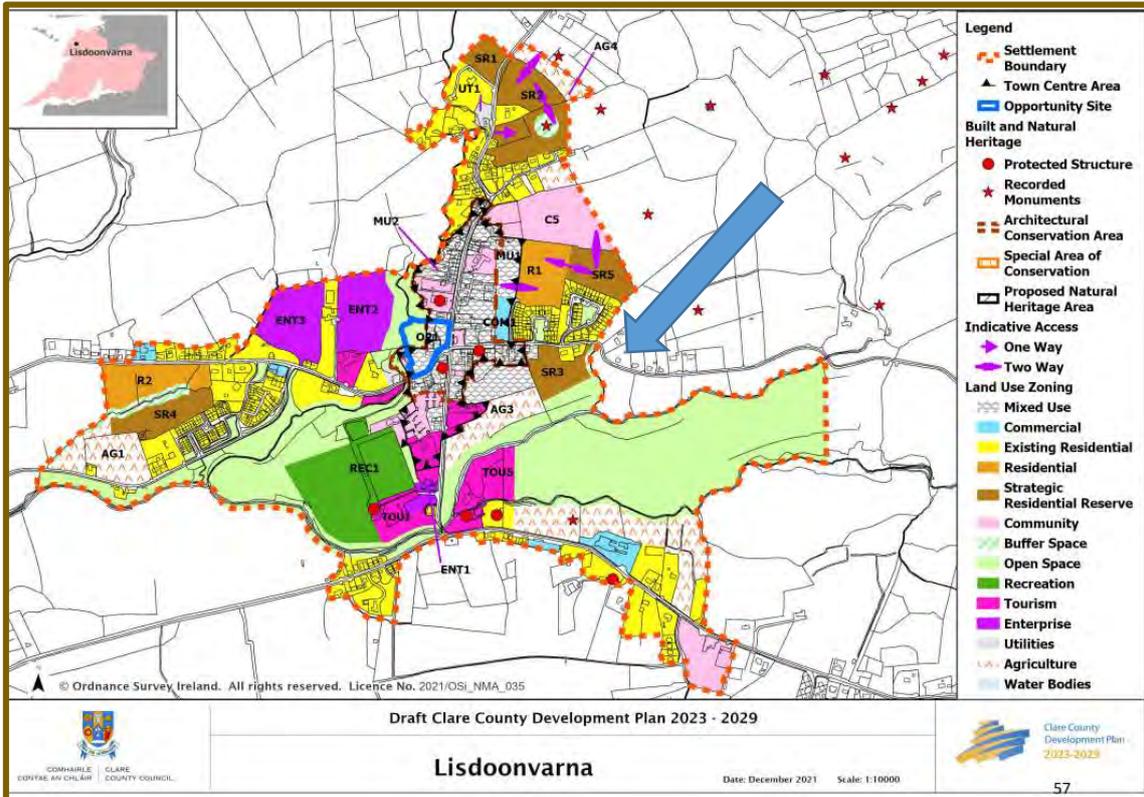
### **Housing & Sustainable Communities:**

Lisdoonvarna offers a high-quality rural environment, situated close to all the amenities of the Burren, in which to live and work. Future developments on Residential zoned lands shall provide for an appropriate housing mix and shall have regard to the density, character, and form of existing residential development in Lisdoonvarna.

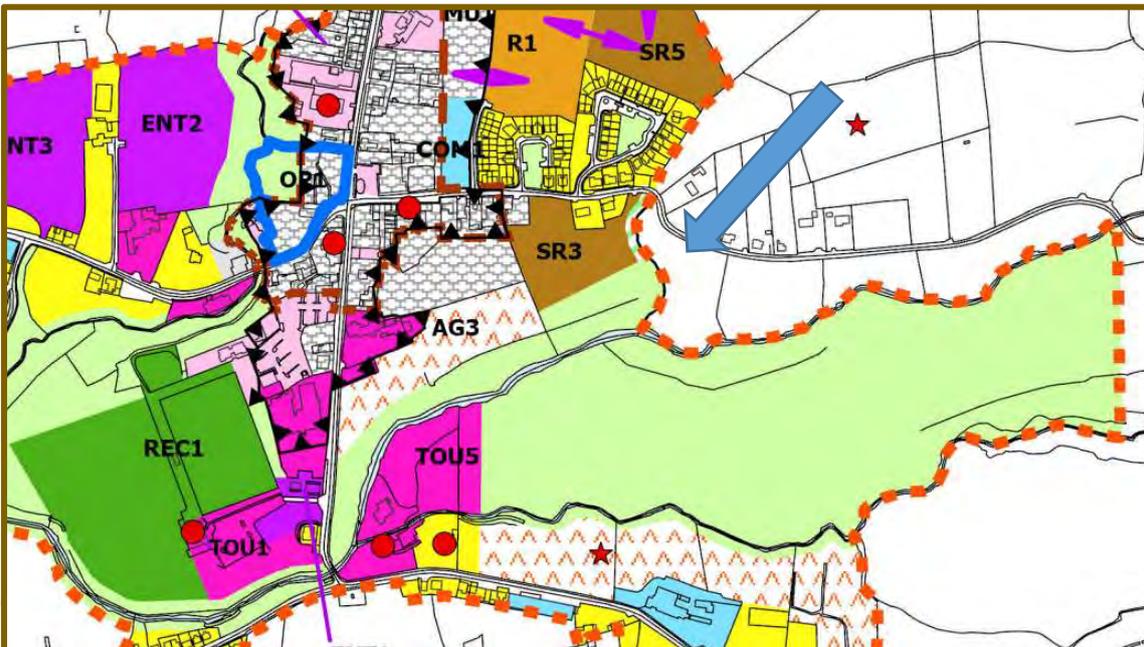
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Director: B. Foudy Comp Secretary: J. Reynolds



*Draft Lisdoonvarna Settlement Plan 2023-2029*



*Extract from Draft Lisdoonvarna Settlement Plan 2023-2029*

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

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

The draft plan omits Low Density Residential from Lisdoonvarna. We would propose to either keep the lands zoned as;

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

**Low density residential** is defined as follows;

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.

#### **Tourism:**

Land zoned for tourism development shall be used for a range of structures and activities which are primarily designed to facilitate tourism development and where uses are mainly directed at servicing tourists/holiday makers and visiting members of the public.

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## Planning History:

### County Development Submissions:

A Submission was made to Clare County Council to have these lands zoned residential for the previous Development Plan (2017-2023). *Ref 466.*

### Planning Application:

A planning application was submitted to Clare County Council on behalf of Mr John O'Neill under planning ref number P04-2691 for construction of 29 holiday homes, reception, offices and ancillary services. The application was withdrawn on 30<sup>th</sup> May 2005.

## Conclusion:

In summary, the main considerations for the retaining zoning on the subject lands are as follows:

- The subject lands are currently located within the settlement boundary of Lisdoonvarna and we feel they should be retained within the new settlement boundary as zoned land.
- The zoning of these lands would comply with policies in both the National Planning Framework: Project Ireland 2040 & Draft Clare County Development Plan 2023-2029
- Unlike many small towns, Lisdoonvarna has adequate foul sewer and water capacity in its infrastructure which are adjacent to the lands.
- The lands benefit from excellent vehicular and pedestrian connectivity to the town.
- There are a range of amenities and community facilities located within easy walking distance of the subject lands.
- Residential development at this location will consolidate existing residential development in the area and help contribute to the compact growth of the town rather than spreading out to R2, SR4, SRI & SR2. The subject lands are more central.
- Finally, it was John O' Neill's wish to develop these family lands, he had often discussed this with the author. You may be aware that Jack was murdered in January of this year in Lisdoonvarna. In my opinion it would be a fitting tribute to retain the zoning and let his sons fulfil his wish to develop these family lands.

We trust that this submission will be given due consideration in the preparation of the Clare County Development Plan 2023-2029 and we look forward to a successful outcome in retaining the residential zoning on the subject lands.

### Signed:



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

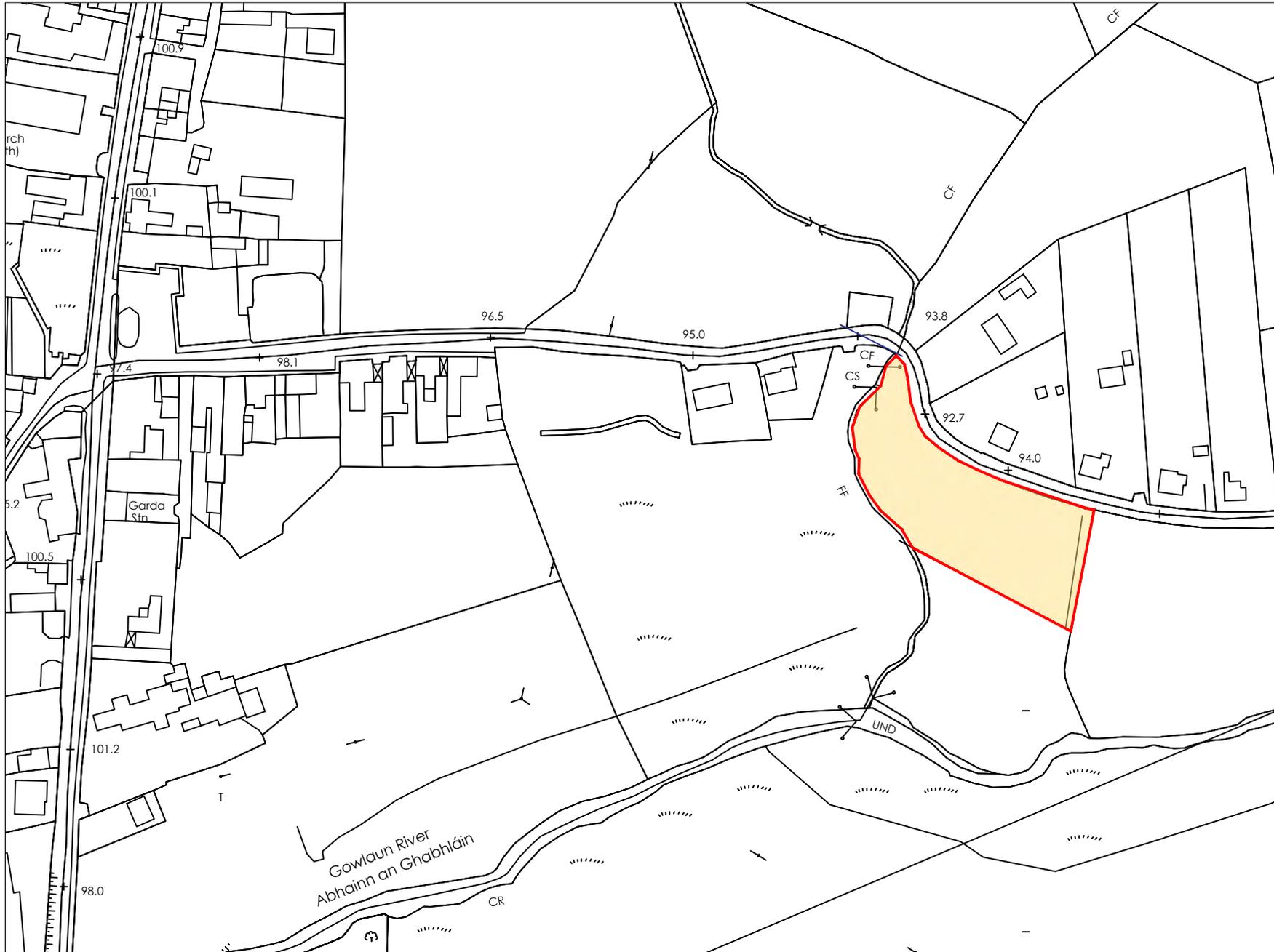
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# ZONING SUBMISSION

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— Site to which this  
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