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CSR Ref: 21437/CC/150322

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

28th March 2022

Online Submission

Re: Submission on Clare County Draft Development Plan 2023-2029 in relation to policy surrounding Coastal Erosion, Designated Sites, Tourism and Recreation.

Dear Sir/Madam,

This submission to the Draft Clare County Development Plan 2023-2029 has been prepared by Cunnane Stratton Reynolds in accordance with section 12(2)(b) of the Planning and Development Act 2000, as amended. This submission is made on behalf of our client, Trump International Golf Links and Hotel (TIGLH), and focuses on policy and objectives for Coastal Erosion, Designated Sites and Tourism and Recreation.

Introduction

On behalf of our client, we would like to congratulate the County Council on the preparation of a thorough and comprehensive Draft County Development Plan that is positively disposed towards development, investment and job creation whilst seeking to ensure that the proper planning and sustainable development of the county is achieved over the plan period.

TIGLH welcome the opportunity to engage in the plan making process and would be happy to discuss the contents of this submission further with Clare County Council.

Background

The Doonbeg Golf Resort was established in 2002 and has become one of Ireland's premier golf and visitor destinations. The owners of the resort have invested heavily in it to create a high quality tourist facility that attracts visitors from all over the world. The links golf course attracts a significant proportion of the visitors to the resort. However, visitors are also attracted by the resort's location, setting and excellent reputation.

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This submission further informs the County Council of the economic and tourism benefits of Doonbeg Hotel and Golf Resort to both the County and the Mid-West Region providing some background to its development and outlining the intentions of our client in maintaining and upgrading the facility so to enhance its status as a world renowned golfing and tourism destination with benefits to the local community, the county, the region and the State. In this regard, please see our introductory comments in regard to national and regional planning policy and guidance.

The National Planning Framework (NPF) – Project Ireland 2040

The NPF is the Government's high level strategic plan for shaping the growth and development of the country to 2040. There is a clear focus on more balanced regional growth with 75% of the growth to be targeted outside of Dublin and its suburbs signalling a shift towards Ireland's regions and cities other than Dublin.

Clare forms part of the Southern Region for which the NPF projects that the population will increase by between 340,000 and 380,000 people with an additional 225,000 in employment by 2040.

The NPF is based on 10 no. National Strategic Outcome (NSO's). The following NSO's are of particular relevance in the context of this submission.

NSO 1 Compact Growth

NSO 2 Enhanced Regional Accessibility

NSO 3 Strengthened Rural Economies and Communities

NSO 4 Sustainable Mobility

NSO 5 A Strong Economy supported by Enterprise, Innovation and Skills

NSO 6 High Quality International Connectivity

NSO 7 Enhanced Amenity and Heritage

NSO 8 Transition to a Low Carbon and Climate Resilient Society

NSO 9 Sustainable Management of Water, Waste and other Environmental Resources

The NPF recognises that the Southern Region is supported by a strong rural economy and a variety of towns and villages. It is noted that "future growth in the region will be based on leveraging national and international connectivity, higher education capacity and quality of life to secure strategic investment. This must be underpinned by sustainable employment and housing development, focused on the broader Limerick- Shannon Metropolitan area and a strengthening of the urban cores of the county towns and principal settlements, as well as in rural areas".

The NPF sets out the key future planning and development and place making policy priorities for this region including:

- *Measures to support the integrated development of remoter parts of this region, particularly rural peninsular areas and towns on its western seaboard, including the ongoing investment in the transport and communications areas, particularly in the roll-out of the national broadband scheme and further promotion and development of attractions to capitalise on underutilised potential in the tourism and local enterprise areas.*

- *Integrated planning, management and development of the areas traversed by the Wild Atlantic Way to maximise both the quality and integrity of the visitor experience and the added benefit in economic terms, especially for rural and local communities.*
- *Developing a more integrated network of greenways, blueways and peatways to support the diversification of rural and regional economies and promote more sustainable forms of travel and activity based recreation.*

The NPF requires that Local Authorities must therefore consider the varied growth potential of different settlement types as well as rural areas and tailor a strategy to balance this accordingly.

NPO6 seeks to “*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*”.

Building on the 2017 Government Action Plan for Rural Development, the NPF places a major focus on strengthening Ireland's rural fabric and supporting the communities that live there by planning for the future growth and development of rural areas with a special focus on activating the potential for the renewal and development of the smaller towns and villages and addressing connectivity gaps.

The role of Ireland's natural resources is recognised and through the development of the agriculture, food, forestry, tourism and renewable energy sectors, these assets will sustain rural employment and contribute to driving the national economy.

NPO 21 seeks to “*Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability*”. This is supported by our client.

The Regional Spatial and Economic Strategy for the Southern Region (RSES)

The RSES identifies the high-level requirements and policies of the Southern Region. It sets out the framework for Local Authorities and relevant stakeholders to implement the NPF within the context of the RSES.

The Regional policies of the RSES align to the NPF and seek to achieve 10 stated strategic outcomes as follows:

1. Compact growth
2. Enhanced regional accessibility
3. Strengthened rural economies and communities
4. Sustainable mobility
5. A strong economy supported by enterprise, innovation, and skills
6. High quality international connectivity
7. Enhanced culture, amenity, and heritage
8. Transition to a low carbon and climate resilient society

9. Sustainable management of water, waste, and other environmental resources
10. Access to quality childcare, education, and health services

The RSES supports the Department of Rural and Community Development's Action Plan for Rural Development which seeks to increase tourist numbers to rural Ireland, support sustainable jobs through targeted tourism initiatives, develop activity tourism and leverage natural and built heritage assets.

In relation to the development of tourism in the region, RPO53 includes the following objectives:

- *'Enhance provision of tourism and leisure amenity to cater for increased population in the Region including recreation, entertainment, cultural, catering, accommodation, transport and water infrastructure inter alia.*
- *Sustainably develop the road network and public transport services and facilities for improved visitor access, longer dwell times due to improved connectivity to ports and airports and tourism growth.*
- *Sustainably develop walking and cycling trails opening greater accessibility to the marine and countryside environment by sustainable modes and promote the sustainable designation and delivery of Greenway and Blueway Corridors.*
- *Facilitate appropriate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, prioritising sustainable projects that achieve maximum impact and connectivity at national and regional level.'*

Guiding our Journey to a Vibrant New Future in Tourism County Clare Tourism Strategy 2030

Our client supports the County Clare Tourism Strategy 2030 and its importance to the preparation of the Draft County Development Plan.

The Strategy Overview 2030 Vision is as follows:

'Clare is a globally renowned sustainable and vibrant destination, recognised for its compelling array of adventure activities and its remarkable experiences portraying our rich culture-scape of age-old spirituality, power and influence; our contemporary vitality arising from our deep-rooted traditions in music, sport and innovation; our dynamic rural towns and villages where our hospitality excels – all set within our stunning backdrop of unique and varied living landscapes.'

County Clare Tourism Strategy 2030 goals are to work collaboratively:

1. *To deliver compelling quality experiences that reflect and leverage our unique identity.*
2. *To be globally recognised as a sustainable destination.*
3. *To create a smart destination that reflects our strong commitment to sustainability, connectivity, innovation and new approaches to doing business.*
4. *To be regarded as 'the gateway to the west'.*
5. *To spread the benefits of tourism across the county and throughout the seasons in a way that enriches our communities while maintaining our distinctive identity and the integrity of our landscapes.*

This Strategy identifies the fundamentals for success as:

- Working collaboratively;
- Elevating the principles of sustainability;
- Strengthening local aspirations;
- Adding value to the offer; and
- Pursuing innovation and longevity.

Throughout this Strategy there is a requirement for all those involved in the tourism sector to work collaboratively to leverage Clare's world class golf resorts. We submit that the County Clare Tourism Strategy 2030 should be incorporated into the emerging County Development Plan so as to strengthen the ability to deliver on its goals. In that regard, in relation to strategic priorities, it is a stated aim of the Strategy to support the sustainable growth of tourism in Clare through promoting, encouraging and facilitating the development of supporting infrastructure, and working collectively to enhance the critical knowledge base of the industry and all partners. In particular it states:

'Supporting Infrastructure

18. Undertake a comprehensive assessment of hotel and visitor accommodation and develop an accommodation strategy to support the growth of overnight visitation.

20. Work with community partners to strengthen the role of towns and villages elsewhere as destination hubs, through identifying infrastructural issues that constrain tourism and encouraging an ongoing improvement of infrastructure and enhancement of the public realm.

Knowledge and Capacity

23. Explore opportunities to network with new partners, including non traditional partners and academic institutions, to engage in knowledge sharing and the identification of innovative thinking.'

The Vision of the Draft County Development Plan 2023-2029

The emerging vision for Clare as set out in the Draft County development Plan 2023-2029 is as follows:

- *'That County Clare would develop as a place to be part of and proud of, where urban and rural communities enjoy a high quality of life, work practice choice, inclusivity and service access and so that the county is a dynamic, resilient, connected and internationally competitive location for innovation and investment and is a national leader in climate action, creativity, culture, heritage, tourism and environmental management.'*

Our client wholeheartedly endorses the vision of Clare County Council and we look forward to seeing policies and objectives in the County Development Plan when adopted that enable this vision to be achieved over the period of the emerging plan.

Our client supports the following goals expressed in section 1.6 of the Draft Development Plan which relate to their existing properties and facilities within the county.

Goal I: A county that is resilient to climate change, plans for and adapts to climate change and flood risk, is the national leader in renewable energy generation, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy.

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

Goal III: A county with strong and balanced urban and rural areas providing key services and a good quality of life and where people with social or economic requirements to live in the countryside are accommodated.

Goal V: A county in which jobs and people are brought together and where the sustainable growth of employment, indigenous enterprise and economic activity is pursued proactively across all economic sectors throughout the county.

Goal VII: A county with diverse and strong rural communities and economy, where its natural resources are sustainably managed in a manner that is compatible with the fragility of rural areas and the existing quality of life.

Goal IX: A county where healthy and sustainable communities are developed and integrated with the timely delivery of a wide range of community, educational and cultural facilities and where, through a commitment to equality, participation, accessibility and social inclusion, the county develops as a unique location with an enhanced quality of life for its citizens and visitors.

Goal X: A county that supports strong economic growth and a high quality of life for all residents through the provision of efficient and robust physical infrastructure whilst having regard to environmental responsibilities and complying with European and national legislation.

Goal XIX: A county that manages and monitors the county level implementation of the National Planning Framework, Regional Spatial Economic Strategy, national plans and guidelines to ensure that quality of life, sustainability, climate action, resilience and inclusivity are the fundamental principles of the future sustainable development of the county.

Our client sees the above as key elements in harnessing the potential of the county's unique location, quality of life, natural resources and other competitive advantages that must be developed and encouraged. This is particularly important in the context of tourism and economic development, where the county's natural resources require to be sustainably managed in a manner that is compatible with the fragility of rural areas, and has regard to environmental responsibilities (including compliance with European and national legislation) on the one hand, while still supporting strong economic growth on the other.

Chapter 9 – Tourism

Clare Tourism Strategy CDP9.1

Clare Tourism Strategy CDP9.1 states that it is an objective of Clare County Council to support the implementation of the County Clare Tourism Strategy 2030 which establishes a vision for the development of tourism in County Clare and provides for the sustainable and efficient provision and management of Clare's tourism resource. This Strategy is also supported by our client.

Section 9.2.3 Tourism Developments and Tourist Facilities

In this section it is recognised that infrastructure development must meet the needs of both the resident and visitor populations in order to ensure that County Clare continues to be a high quality place in which to live, work and visit. A wide range of facilities are required to support the tourism industry and to attract visitors to the County. Many of these facilities can also be used by local residents. These include visitor attractions/interpretive centres, wellness and self-development facilities, equestrian, water-sports and outdoor adventure activities, facilities for boat rental and inland cruising, and family amenities such as playgrounds and woodland walks. In addition, long-term projects such as the Wild Atlantic Way are essential to the economic growth derived from the tourism offering in the County. We submit that golf be included in the list of facilities required to support the tourism industry in the County, in recognition of the important role many golf courses already provide in the County including that operated by our client. It is noted that the Council will promote the development of tourism in a manner that is compatible with the conservation and enhancement of the environment and that commitment is fully supported by our client.

Tourist Developments and Tourist Facilities CDP9.4

It is an objective of Clare County Council:

- a) To permit tourism-related developments and facilities inside existing settlements where the scale and size of the proposed development is appropriate and in keeping with the character of the settlement, subject to normal site suitability considerations.
- b) To permit tourism-related developments outside of settlements where there is a clear need for the specific location and the benefits to the local community are balanced with any potential environmental impact;
- c) To ensure that development of new or enhanced tourism infrastructure and facilities include an assessment of the environmental sensitivities of the area including an Environmental Impact Assessment (EIA); Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) if required in order to avoid adverse impacts on the receiving environment; and
- d) To work with the relevant authorities to develop specific monitoring protocols for visitor pressure on the County's natural, archaeological and built heritage asset and to ensure that tourism activities are maintained within sustainable limits for the European sites in the County.

Items (b) and (c) above are supported by our client. Item (d) is also supported and we note in particular the emphasis on seeking to maintain tourism activities.

9.2.5 Wild Atlantic Way

Section 9.2.5 promotes the advantages of Wild Atlantic Way to tourism and investments in the County. There needs to be an emphasis in this section that locations on the Wild Atlantic Way that are not declared as signature or discovery points need to be promoted as important and significance given to their role as attractions within the way. Exploration of the wider geographic area is mentioned however greater emphasis is required for areas within the Way.

9.2.8 Business Tourism

Within this section the fact that the Council will continue to work with hotels that offer conference facilities so that opportunities to partake in this growing market are maximised, is welcomed. It is our view that business tourism can and should be attracted to the county with a range of amenities and facilities and not just conferencing, as conferencing is likely only one element of a business trip.

Within this section our client fully supports the following:

'The combined business and leisure sector 'Bleisure' where professionals are increasingly adding extra leisure days onto a business trip has the potential to bring significant additional revenue to the local area. It is important to ensure that conference and business tourism facilities are integrated with other areas of the tourist economy such as through promotion of local activities and attractions on hotel websites.'

Development Plan Objective: Business Tourism CDP9.7

Our client fully supports the following development plan objective CDP9.7.

'It is an objective of Clare County Council:

- a) To promote, encourage and facilitate the provision of new conference facilities and the expansion/upgrade of existing conference facilities throughout the County at appropriate locations and in full compliance with all relevant environmental legislation in particular the requirements of the Habitats Directive;*
- b) To support the work of the Shannon Region Conference and Sports Bureau;*
- c) To encourage the development of a new internationally branded hotel and convention facility in Ennis to enhance the tourism product; and*
- d) To support and encourage the marketing of County Clare as a conference location at national and international levels.'*

9.2.9 Activity and Adventure Tourism

Our Client fully supports the emphasis placed on golf within this section and recognises that there is significant potential that exists to further develop these forms of tourism in a sustainable manner. Furthermore, our client wholeheartedly supports Development Plan Objective CDP9.8.

Development Plan Objective CDP9.8 states that:

'It is an objective of Clare County Council which is to work with local communities and relevant agencies to achieve the sustainable development of County Clare as a world-class destination for sports and recreation-related tourism development'

9.2.13 Coastal Tourism

We support the Development Plan Objective: Coastal Tourism CDP9.12. It states that:

'It is an objective of Clare County Council, a) To encourage the development of coastal tourism such as water-sports and water-related activities subject to normal planning and environmental criteria. . . .'

We ask that golf links courses be added to the list of Coastal Tourism Developments that will be encouraged, as they are a unique feature of the county and a key attraction for coastal tourism.

9.2.18 Sustainable and Responsible Tourism

Our client supports Section 9.2.18 where the County Council state:

'The NPF and RSES for the Southern Region recognise that in order to develop a sustainable tourism industry in Ireland, infrastructural investment is required to enhance amenities including the built, cultural and natural heritage assets in both urban and rural areas. Investment in developing a well-designed public realm in settlements, recreational infrastructure and rural amenities including activity-based tourism and trails, such as greenways and blueways will significantly contribute to the sustainable growth of the tourism sector. County Clare is well positioned to progress sustainable and responsible tourism initiatives. . . . In accordance with the requirements of the RSES for the Southern Region specific monitoring protocols for visitor pressure are required to ensure that tourism activities are maintained within sustainable limits.'

9.2.19 Niche Tourism

We support the acknowledgment of the importance of niche tourism markets including the higher end golf market.

9.3.5 Tourism in West Clare

We support the recognition of hotels, golf courses, numerous amenities and a unique culture and landscape within the county as set out in Section 9.3.5 and acknowledge that *"Significant potential exists to further promote key settlements such as Doonbeg, from a tourism perspective, building on the existing amenities and events in these areas"*.

Our client also supports Development Plan Objective: Tourism in West Clare CDP9.25 which seeks the following specifically in relation to our client's resort in Doonbeg:

- 'b) To promote and market the area, building on the cultural amenities and entertainment facilities of Doonbeg; and,*
- j) To promote and further develop the Shannon Estuary Way and the Wild Atlantic Way;'*

Chapter 13 – Marine, Coastal and Island Management

Our Client supports Section 13.4 of the draft development plan which states:

'At present management of the coastal zone is the responsibility of various different authorities including the Department of Agriculture, Food and the Marine, the Department of Housing, Local Government and Heritage, the Department of Environment, Climate and Communications and the local authorities. Reforms to the management of the foreshore and

offshore areas and the consenting process associated with developments in these areas are currently underway. It is envisaged that these reforms under the Marine Planning and Development Management (MPDM) Bill 2021 will simplify the management structure and expedite the consenting process. Local authorities, including Clare County Council, will also play a stronger role in the management of their coastal areas. In addition the Council will support the Maritime Area Regulatory Authority (MARA) in fulfilling their functions which will include maritime area consents and licences, compliance and enforcement and the management of the existing State Foreshore portfolio of leases and licenses.'

Our client as the owner of a coastal land resource looks forward to liaising with the relevant parties to promote protection of the coastal area as set out in the above paragraph. Our client suggests additional wording be added to the effect that: *'Landowners and the relevant agencies will work within existing and prospective reforms to the management of the foreshore and off shore areas to address ongoing natural forces impacting coastal erosion.'*

13.6 Integrated Coastal Zone Management (ICZM)

This section acknowledges that human impacts, resulting from coastal developments coupled with the impacts of global climate change, place continuous pressure on County Clare's coastal environments. Coastal areas are among the areas most vulnerable to climate change and the impact of climate change on the coastline of County Clare is already evident. These areas will be increasingly susceptible to impacts such as inundation and erosion due to further sea level rise and the increasing regularity and intensity of extreme weather events. Such impacts are far reaching and are already changing the lives and livelihoods of coastal communities. In order to effectively adapt to climate change in coastal areas, a high level of understanding of the coastal system is required, supported by effective monitoring of vulnerable locations and the identification of when/where remedial action is required.

We strongly believe that the sentiment expressed in the paragraph above should form the basis of policy in the emerging Plan. We would respectfully suggest therefore that a specific Development Plan Objective be generated from the above paragraph as follows with some additional wording suggested in bold below to what is contained above:

Development Plan Objective: Integrated Coastal Zone Management CDP13 states:

'It is an objective of Clare County Council to encourage greater understanding of the coastal system, to encourage effective monitoring of vulnerable locations and the identification of where, when and what specific remedial action is required.'

Our client supports Development Plan Objective: Protection of Beaches and Sand Dunes CDP13.13 which states that:

'It is an objective of the Development Plan:

- a) *To permit maritime development on sites either on or adjacent to any beach area, only where such developments would not significantly interfere with the recreational use of the area or would not cause damage or degradation of the beaches or sand dune system;*

- b) *To assist all relevant stakeholders to proactively monitor and manage the dune systems in the County in full compliance with the EU Habitats Directive; and*
- c) *To protect the structure and function of sand dunes within the County, (which include Annex I habitats and Annex II species), and to ensure that any permitted development would support the integrity (ecological and visual) of these areas and comply with the requirements of the Habitats and Birds Directives.'*

13.14 Coastal Erosion and Flood Defence

Coastal erosion is recognised as a significant issue within the county.

Section 13.14 states that:

'The rising sea levels, increased storm frequency and wave energy associated with climate change can increase the rate of erosion, wave damage, coastal flooding amongst other impacts. County Clare is particularly susceptible to the impacts of these coastal changes and predicted rises in sea levels will compound these issues in the future. To assist in building climate resilience in coastal areas it is necessary to actively manage the coastal environment and the risks associated with these anticipated changes. It is also necessary to ensure that new developments take account of future risk from coastal erosion, storm surges and sea level rise and, where possible, employ ecosystem-based adaptation actions to manage climate risk and build resilience to climate change.'

13.14.2 Coastal Protection in County Clare

This section states that:

'The Office of Public Works (OPW), as part of their Coastal Protection Strategy Study has carried out an assessment of erosion hazard and potential risk in coastal areas around Ireland. A series of erosion maps were produced which facilitate a strategic assessment of erosion hazard and provides valuable information on the economic value of assets at potential risk from erosion. The erosion mapping also facilitates consideration of the hazard and potential risks to future proposed development near the coastline (both strategic and non-strategic) at the planning stage. The erosion maps were produced primarily as a tool to identify any assets likely to be affected by coastal erosion by 2030 and 2050. It should be noted that the assessment did not include a consideration of future climate change scenarios and the likely impact on erosion hazard and potential risk. The outcome of the assessment was taken into consideration in the preparation of this Plan.'

Our client supports Development Plan Objective: Coastal Erosion and Flooding CDP13.11. This objective states that:

'It is an objective of Clare County Council:

- a) *To engage with the OPW so it develops appropriate strategies for the management of identified coastal flood and erosion hazards and associated risks;*
- b) *To have regard to the Clare County Strategic Flood Risk Assessment, CFRAM Flood Risk Management Plans, the OPW Coast Protection Strategy Study, and any updated version/more detailed local studies, in the assessment of development applications in coastal areas;*

- c) *To permit developments only where the Council is satisfied that they will not be at risk from coastal erosion or inundation in the future;*
- d) *To permit developments only where the Council is satisfied that it will not result in an increase in coastal erosion or increase the risk of inundation, either at the subject site or at another location in the vicinity;*
- e) *To only permit development outside the boundaries of existing settlements where such development can be adequately defended over the lifetime of the development without the need to construct additional or new coastal defences;*
- f) *To support and facilitate the carrying out of coastal defence works based on the outcome of detailed Coastal Erosion and Flood Risk Management Studies undertaken in areas identified as being at risk from coastal flooding;*
- g) *To ensure full compliance with the requirements of the Habitats Directive, Water Framework Directive and overarching environmental Objective CDP3.1 of this plan with regard to development in the coastal area;*
- h) *To have regard to any future adopted Integrated Coastal Zone Management Plan for the coastal and estuarine areas of the County, undertaken in accordance with the Habitats and SEA Directive.'*

13.15 Coastal Squeeze

Our client supports Development Plan Objective: Coastal Squeeze CDP13.12 which states:

'It is an objective of the Development Plan: To ensure that coastal squeeze is taken into consideration in formulating and assessing coastal development proposals.'

13.16 Beaches, Sand Dunes, Reefs and Shorelines

This section states that:

'The Council will review the status of important dune systems in the County as part of a wider programme of coastal management. It is important, not only to the economy of coastal areas, but also in the interest of protecting natural amenities, that the beaches and sand dunes of the County are protected and proactively managed.'

Our client supports Development Plan Objective: Protection of Beaches and Sand Dunes CDP13.13.

This objective states that:

'It is an objective of the Development Plan:

- a) *To permit maritime development on sites either on or adjacent to any beach area, only where such developments would not significantly interfere with the recreational use of the area or would not cause damage or degradation of the beaches or sand dune system;*
- b) *To assist all relevant stakeholders to proactively monitor and manage the dune systems in the County in full compliance with the EU Habitats Directive; and*
- c) *To protect the structure and function of sand dunes within the County, (which include Annex I habitats and Annex II species), and to ensure that any permitted development would support the integrity (ecological and visual) of these areas and comply with the requirements of the Habitats and Birds Directives.'*

Our client would encourage Clare County Council to insert the following objective in respect of dunes under the heading dune protection:

'Protection of Dune Systems

'The County Council recognizes that dune system damage can be caused by overuse and insensitive activities and will seek to limit the extent, frequency, duration, and nature of such harmful activity. Where damage has been caused, the County Council will work with the appropriate State agencies and stakeholders to ensure appropriate rehabilitation, remediation measures and suitable management practices are put in place. The County Council will assist in seeking to ensure that such damage is appropriately repaired so that there is a stable dune system in place to ensure protection of important natural heritage.'

Chapter 15 - Biodiversity, Natural Heritage and Green Infrastructure

Our client supports Development Plan Objective: European Sites CDP15.3. This objective states:

'It is an objective of Clare County Council:

- a) To afford the highest level of protection to all designated European sites in accordance with the relevant Directives and legislation on such matters;*
- b) To require all planning applications for development that may have (or cannot rule out) likely significant effects on European Sites in view of the site's Conservation Objectives, either in isolation or in combination with other plans or projects, to submit a Natura Impact Statement in accordance with the requirements of the EU Habitats Directive and the Planning and Development Act, 2000 (as amended); and*
- c) To recognise and afford appropriate protection to any new or modified SPAs or SACs that are identified during the lifetime of this Development Plan through the planning application process bearing in mind proposals for development outside of a European site may also have an indirect effect.'*

Our client also supports Development Plan Objective: Natural Heritage and Infrastructure Schemes CDP 15.9. This objective states that:

'It is an objective of Clare County Council: To be responsive to environmental challenges and to ensure the protection of natural heritage when considering proposed service infrastructure and proposed road works (both realignments and new roads) located in, in close proximity to, or nearby protected species or sites of importance in terms of biodiversity.'

Our client suggests an additional objective as follows:

'Designated Sites

It is acknowledged that the designation of Natura 2000 sites seeks to ensure their protection from natural and human generated forces both direct and indirect and in these circumstances protection will be provided against such naturally occurring and dynamic processes. The County Council will encourage appropriate management of Designated Sites to ensure that degradation and diminution of such environmental and ecological assets does not occur.'

Recreation – Chapter 10 Sustainable Communities

Our client supports Development Plan Objective: Physical Recreation and Active Living CDP10.10 where it is a stated objective to:

- a) *'a) To support the implementation of the National Sports Policy 2018-2027 (both the vision and objectives), the National Sports Capital Programme, the Healthy Ireland initiative, the National Physical Activity Plan and the Healthy Clare Strategic Plan 2019-2021 and any subsequent policies, strategies, plans or programmes;*
- b) *To promote Active Living as a means of enhancing health, wellbeing and social inclusion;*
- c) *To work with local community groups to support and expand the Slí na Sláinte network in County Clare, in compliance with all relevant legislation;*
- d) *To work with Clare Sports Partnership, local communities, clubs and relevant bodies to support local groups that promote/organise walking, cycling and other recreational activities and to increase sport and physical activity participation in the County;*
- e) *To support the coordinated development of new indoor and outdoor recreational facilities in County Clare, based on need;*
- f) *To support investment in the sustainable development of larger sports projects in the region under the Large-Scale Sports Infrastructure Fund;*
- g) *To work in coordination with all relevant stakeholders to ensure that the necessary facilities and infrastructure are in place to support Active Living and increased levels of physical recreation;*
- h) *To support the development of cycle-parking facilities at appropriate locations in all urban areas in the County;*
- i) *To ensure that new recreation facilities/amenities are based on the principles of sustainable development and incorporate efficient heating systems, lighting etc;*
- j) *To ensure that sufficient lands are zoned for recreational uses to meet the needs of the projected population during the lifetime of this Plan; and*
- k) *To ensure that future development, zoning or recreational facilities are in compliance with all relevant legislation as outlined in Objective CDP3.1.'*

Our client suggests that an additional arm of policy be inserted as follows:

'(l) to support the extension and modification of existing sports, social, cultural and leisure facilities where these are consistent with the proper planning and sustainable development of an area.'

Additional Matters

Heritage Landscapes

Our client supports Development Plan Objective: Heritage Landscapes CDP14.5. This objective seeks:

'To require that all proposed developments in Heritage Landscapes demonstrate that every effort has been made to reduce visual impact. This must be demonstrated for all aspects of the proposal - from site selection through to details of siting and design. All other relevant provisions of the Development Plan and the RSES must be complied with. All proposed developments in these areas will be required to demonstrate;

- I. That sites have been selected to avoid visual prominence;*

- II. *That site layouts avail of existing topography and vegetation to minimise visibility from scenic routes, walking trails, public amenities and roads;*
- III. *That design for buildings and structures minimises height and visual contrast through careful choice of forms, finishes and colour and that any site works seek to reduce the visual impact of the development.'*

Whilst this objective is supported by our client, we would respectfully suggest that the following objective be added or incorporated into the above objective:

'Heritage Landscapes

The County Council will assist statutory agencies and landowners to ensure that these lands of heritage landscapes and high amenity value are secure and protected from natural forces and processes, and change including that which relates to climate, and proposed development as defined by the Planning and Development Act 2000 as amended.'

Our client proposes the following objective for areas of landscape and amenity value.

'Areas of Landscape and Amenity Value

'Where there is a landscape of high visual and amenity value that requires to be protected, in particular an area of ecological significance that provides both a habitat resource and an amenity with tourism and leisure potential, the County Council will take such steps as are appropriate to protect those areas and features in consultation with both Statutory Authorities and Landowners.'

Access to National Roads

We support the reference in Section 11.2.9.3 (Access onto National Roads) to Hotel and Golf Links, at Doonbeg and any intensification of existing uses there being considered an exception to the presumption of new or enhanced access directly onto national roads on grounds of being of a strategic nature and importance.

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,



CUNNANE STRATTON REYNOLDS

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