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Draft Clare County Development Plan 2023-2029,
Planning Department,
Clare County Council,
New Road,
Ennis, Co Clare.
V95 DXP2

By email: devplan@clarecoco.ie

25th March 2022

Re: Submission on the Draft Clare County Development Plan 2023-2029 on behalf of Lough Derg Football Club.

Dear Sir/Madam,

I refer to the submission prepared by HRA PLANNING Chartered Town Planning Consultants on behalf of Lough Derg Football Club and submitted to Clare County Council dated 12th November 2020 in respect to its publication of the Stage 1 Pre-Draft Issues Paper in advance of preparing its Draft Clare Development Plan 2023-2029.

The Council will be mindful that the submission focused on the spatial land use requirements of Lough Derg FC based in Killaloe Co. Clare, and demonstrated that there is currently insufficient suitable land identified and provided for active recreational use and specifically land suitable for football playing pitches within the existing Killaloe Settlement Plan in the Clare County Development Plan 2017-2023. The Club had respectfully requested that the new development plan provided for additional open recreational space to meet the needs of the local community, and expressly, the provision of additional playing pitches as a recognised open space typology, which would be accessible for club/community and/or public use.



Upon review of the Chief Executive's Report on the Pre-Draft Public Consultation Process published in January 2021, Lough Derg FC welcomed the recommendations of the Chief Executive which indicated a clear and express intention "*to consider the issues outlined in the submission* " in the preparation of the land-plan and settlement statement for Killaloe.

Further to the submission and upon review of the Draft Killaloe Settlement Plan contained in Volume 3c of the Draft Clare County Development Plan 2023-2029, it is evident that no additional land has been zoned for 'Recreational' use and specifically land suitable for football playing pitches compared to the land zoned within the existing Killaloe Settlement Plan as requested in the submission. As this would appear at odds with the indication and recommendations of the Chief Executive in its report, Lough Derg FC would welcome that this matter would be addressed in the final plan and that sufficient and additional land is provided for 'football playing pitches' to meet the existing demand for such facilities in Killaloe as requested.

For your convenience, I enclose a copy of the original submission.

Yours sincerely,



Gary Rowan MRTPI MIPI
Director HRA | PLANNING

'Development Plan Review' Submission

Prepared on behalf of Lough Derg Football Club

Submitted to Clare County Council
forwardplan@clarecoco.ie



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Title:	Development Plan Review Submission	
Project:	2042 Lough Derg FC Development Plan Submission	
Prepared by:		
Signed:	Gary Rowan Director	
Date:	November 2020	
Issue:	1	
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TABLE of CONTENTS

1.0	Introduction	4
2.0	Policy Context.....	4
3.0	Background Context - Lough Derg FC Land Use Requirements.....	6
4.0	Demand Analysis	7
4.1	<i>Existing 'Recreation' Zoning Provision & take-up.....</i>	<i>7</i>
4.2	<i>Recommended Guidance for Playing Pitches.....</i>	<i>12</i>
4.0	Recommendations	13

1.0 Introduction

HRA PLANNING Chartered Town Planning Consultants has prepared this submission on behalf of Lough Derg Football Club (Lough Derg FC) in respect to the review by Clare County Council of the existing Clare County Development Plan 2017 – 2023 and preparation of a new County Development Plan.

This submission focuses specifically on the spatial landuse requirements of Lough Derg FC based in Killaloe Co. Clare and, the review by Clare County Council of **the Killaloe Municipal District Plan Written Statement** and **Settlement Plan** which currently forms Appendix 3c of the current County Development Plan.

The purpose of the submission is to demonstrate to Clare County Council that there is currently insufficient suitable land identified and provided for active recreational use and specifically land suitable for football playing pitches within the existing Killaloe settlement plan. Furthermore, Lough Derg FC will demonstrate that there is a demand for additional playing pitches within Killaloe together taking into account also, its neighbouring village of Ballina (Co. Tipperary) and their immediate hinterland from where the membership of Lough Derg FC club is based.

Securing a second natural turf pitch in the least is a priority for the club to meet the current and projected demand for soccer and physical activity in the area.

On this basis, Lough Derg FC respectfully request that Clare County Council in preparing its new settlement plan for Killaloe, will identify and safeguard additional sufficient land suitable for club playing pitches within the new settlement plan. This submission includes a number of suggested recommendations in Section 4.0 which should inform the new settlement plan.

Approach

This submission is based upon evaluation of existing provision of 'Recreation' space and playing pitches, and demand analysis for same in the context of various National, Regional and local spatial development objectives.

2.0 Policy Context

At a National level, **The National Planning Framework (NPF) under Project Ireland 2040**, sets out the overarching policy and planning framework for the social, economic and cultural development of Ireland. The NPF sets out at a strategic planning and development guide for the country over the next 20+ years, so that as the population grows, that growth is sustainable (in economic, social and environmental terms).

In its guidance to local authority, the NPF places emphasis on addressing local community and amenity facility provision. Section 6.2 of the NPF ('Heathy Communities' states that health and environment "*are inextricably linked*" and that specific health risks can be influenced by spatial planning. In response to greater car dependency, the NPF sets out specific policy objectives which include:

National Policy Objective 26

Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, though integrating such policies, where appropriate and at the applicable scale, with planning policy.

And:

National Policy Objective 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.

The 'National Physical Activity Plan' referred to in NPO 26 above; seeks to encourage the population to get active and to raise awareness of the benefits of living an active lifestyle, not just for health but in a wider socio-economic context. Action area four of that Plan, reviews how the natural and built environment can influence physical activity behaviour, and it includes a number of actions set out to ensure that the built environment provides and encourages opportunities for physical activity and other health-related activities. Further to that, Action 36 of that Plan, seeks to 'prioritise the planning and development of walking and cycling and general recreational/physical activity infrastructure.'

At a regional level, the **Regional Spatial and Economic Strategy (RSES)** for the Southern Region acknowledges that the quality of recreational facilities can contribute the quality of life of local communities and 'supports the development of new and upgraded local sporting facilities'.

At the local level, the existing **Clare County Development Plan 2017-2023** reaffirms that physical activity and active living can have a positive effect on health and well-being and acknowledges the critical role that the Local Authority plays in creating environments and opportunities for physical activity. In order to support and encourage physical recreation and active living in the county the CDP sets out a number of specific policy objectives, which include:

County Development Plan Objective 5.11 (F)

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.

And

County Development Plan Objective 5.11 (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.

The CDP objectives for the provision and enhancement of community facilities for physical recreation are further supported by a number of Local Authority documents including the Clare Local Economic and Community Plan 2016-2021 and the Limerick and Clare Sport and Physical Recreation Strategy 2013 for example, one of the key themes relevant in the strategy is 'The need to maximise the use of facilities that already exist in the community, to upgrade and enhance them where necessary as well as to provide new facilities.'

Thus, in collective consideration of the spatial planning framework from the National to local level, it is clearly evident that there is increased emphasis and intent placed upon the Planning system facilitating 'quantity' and 'quality' of open space as a component part of social infrastructure for the purpose of supporting strong communities, and for personal health and well-being.

3.0 Background Context - Lough Derg FC Land Use Requirements

Established in 2002, Lough Derg FC is a soccer club catering for boys, girls & adults from the Ballina/Killaloe and surrounding areas. The club comprises numerous age group profiles ranging from the underage 'Academy' players ranging from U6-U10 age groups, U12-U16, and an Adult 'junior' team. Whilst the club is based currently in Clarisford Park, Killaloe, Co. Clare, the Club serves the communities of Killaloe, Ballina and their surrounding hinterland. This, like the Ballina Killaloe Rugby club, is an example of the unique integrated relationship that exists between both communities on either side of the River Shannon.

Figure 1 illustrates the location of Lough Derg FC within Clarisford and within the context of both Killaloe and Ballina settlement areas. In addition, Figure 1 illustrates a 10-minute drivetime catchment to Lough Derg at Clarisford which is a reasonable reflection of its membership base. Within the 10-minute catchment area the population is 6,437, 23% of this population is aged between 0-14years, this is the primary age-group served by the football club.

The club has 480 players from age 4 to adult, of which 100 are female and growing, all of whom are supported by 55 local coaches. The club plays in the North Tipperary School children's Football League and the recent establishment of the junior Adult team has saw the club promoted to the premier division within its first two seasons.

The football club has undertaken further analysis of the registration figures for 2016 in comparison to the Census 2016 population figures for the Killaloe and Ballina. The findings conclude that 17% of the total population for Killaloe and Ballina (4116) are within the 5-14 years age group, this is the primary age group of members registered with the club. In Killaloe 32% of the population aged between 5-14, and in Ballina 32% of the population aged between 5-14 are registered members of the Lough Derg Football Club. This information demonstrates that the Lough Derg Football Club serves both of the communities within its catchment area.

In 2014 the club secured its first long lease in Clarisford Park, a Sport Ireland recognised community sports hub in Killaloe, with rugby, athletics and scouts facilities alongside each other in a beautiful wooded parkland setting by the lake with a 1km track perimeter for recreational use.

The Club has the benefit of one full size competition soccer pitch through a long-term lease arrangement with 'Ballina/Killaloe Sports and Community Facilities Development Company' within the Clarisford Park estate in Killaloe. Separate from that, the club has access to an additional (non-regulation size) pitch and smaller training area offered by Ballina/Killaloe Sports And Community Facilities Development Company' within the Clarisford Park and at the neighbouring Clarisford Park '3G' pitch at additional cost to the club. In addition, the Club also uses the pitch in the local secondary school (St. Annes Community College) for the Saturday morning soccer academy for ages 4-11years to meet demand.

The pitch and facilities offered by 'Ballina/Killaloe Sports And Community Facilities Development Company' is not just an incredible resource to the club, the local community and other sporting organisations in the village, but it is an exemplar model of investment and development of sporting infrastructure. It is on this basis that Lough Derg FC has and will continue to work closely with Clarisford sports company for the benefit of the club and the local community.

That said, demand by Lough Derg FC for playing pitch and training space has and continues to outstrip current club assets and availability of existing local options. The current club training regime which occurs through the week and the weekend for all age groups, has on occasion, required teams to share pitch space, thus reducing the technical space necessary to conduct comprehensive and recommended soccer training programmes.

Consequent to that, and as a short term option, the club has recently entered into an agreement with Birdhill FC to lease its soccer pitch situated some 5.5km from Killaloe on the old N7 in order to fulfil Lough Derg FC home fixtures and to undertake some junior training. This arrangement is not an ideal nor sustainable long-term solution as it requires players and parents of junior players to travel outside of both Killaloe and Ballina to partake in local Club sporting activities.

4.0 Demand Analysis

4.1 Existing 'Recreation' Zoning Provision & take-up

In support of this submission, a land use analysis was undertaken of existing 'Recreation' zoned land and playing pitch spaces within the current Killaloe settlement plan.

The existing Killaloe settlement Plan (County Development Plan 2017-2023, Volume 3) indicates a provision of circa 15 hectares of land zoned specifically for 'Recreation' use. This 'Recreation' zoning objective is in principle, the only suitable landuse zoning objective that would support the provision of playing pitches and formal active openspace use.

However, upon detailed analysis of this zoning provision, it is clearly evident that there is no surplus provision of 'Recreation' zoned land or open space areas which could be utilised by Lough Derg FC for their immediate Club requirements.

The landuse zoning objectives are illustrated in Figure 2 which identified the specific areas of 'Recreation' landuse zoning. All of the existing 'Recreation' zoning land is committed for specific sporting club uses and activities. Aside from Clarisford, those specific areas of zoned 'Recreation' (identified in Figure 2 and Figure 3) include, Smith O'Brien GAA, Killaloe/Ballina Tennis Club (the latter club has approval for a large expansion plan of its facility at that location). Furthermore, the 15 hectares of zoned 'Recreation' land in the existing Killaloe Settlement Plan, is not an accurate reflection of the current provision of actual space which might be used for playing pitches. For example, whilst Clarisford Park measures a total of 5.85ha, only a smaller part of the Park is available for pitches as the remainder forms part of the Derg Athletics club facilities and the mature parkland setting.

A detailed examination of the 'Recreation' zoning confirms that circa 7.3 ha of the 15 ha is used as 'active openspace, but of which, only 3.9ha accounts for playing pitches. This 3.9ha of 'playing pitch is based on the following facilities; the existing Lough Derg pitch at Clarisford (0.63ha), Smith O'Brien GAA pitch (1.5ha), Clarisford Rugby pitch (1.0ha) and, the 3G all-weather pitch (0.78ha). In addition to Killaloe, the only formal playing pitches in the neighbouring village of Ballina, are the Ballina GAA pitch which measures 2.8 hectares. Thus, Killaloe has 3.9ha of playing pitch space, whereas both villages combined provide for a total of 6.7ha.

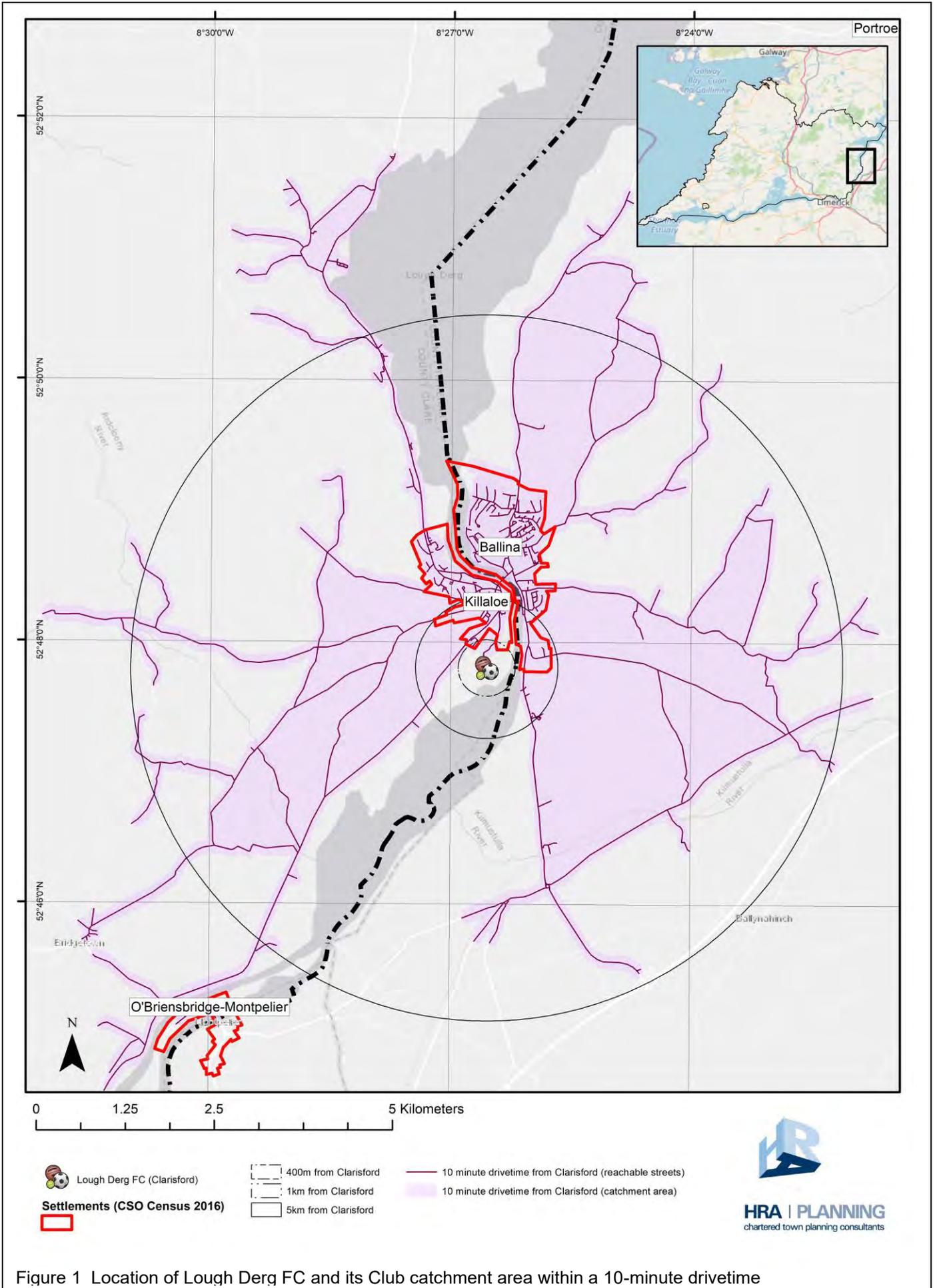


Figure 1 Location of Lough Derg FC and its Club catchment area within a 10-minute drivetime

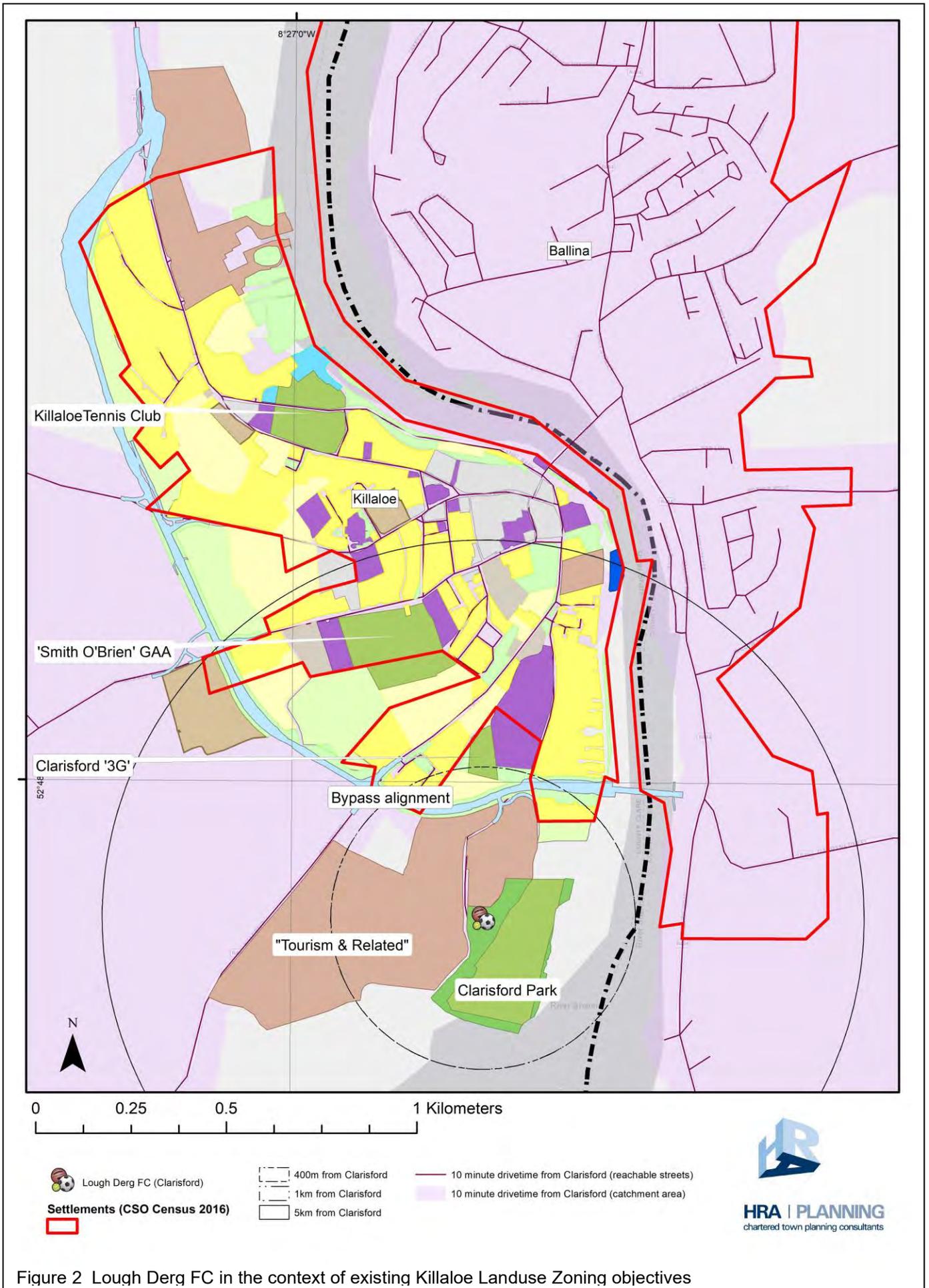


Figure 2 Lough Derg FC in the context of existing Killaloe Landuse Zoning objectives

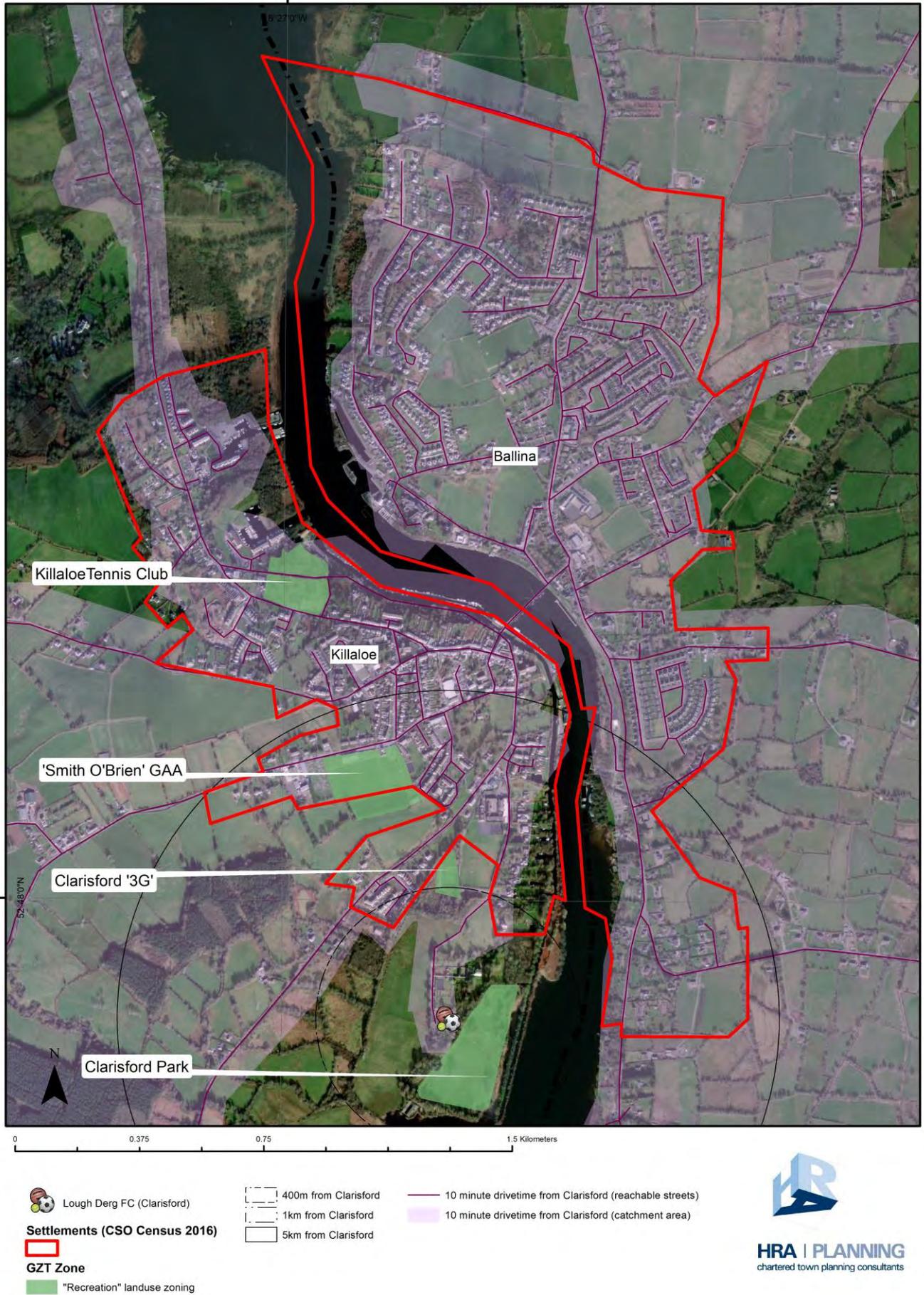


Figure 3 Lough Derg FC in the context of existing 'Recreation' landuse zoning.

4.2 Recommended Guidance for Playing Pitches

At present, there is no relevant guidance available for sports facilities in Ireland. Therefore, consideration has been given to a relevant UK publication – ‘Guidance for Outdoor Sport & Play’ published by Fields in Trust (FIT). This publication is used in the UK to set out benchmark guidance for the provision of open space and amenity for urban planning and design and it has been referenced by other local authorities in Ireland¹.

The FIT guidance provides quantitative guidance for openspace which is classified under several different open space typology types of which, ‘Playing pitches’ are described as a defined typology type. The guidance sets out recommended minimum standards for playing pitches based at a recommended minimum of 1.2 ha per 1,000 population.

Applying this standard to Killaloe would suggest a minimum requirement of 1.7 ha of playing pitches based on a settlement population of 1484². However, the actual provision and availability of playing pitches available to Lough Derg FC in Killaloe is much less than the recommended minimum requirement at 1.41ha. This calculation of 1.4ha is based on the existing soccer pitch (0.63ha), and the 3G pitch (0.78ha). (The sand-based training pitch as well as other sporting facilities is discounted from this calculation as they are either below the recommended pitch size, or they are committed for express use of different sports clubs).

This analysis is limited to the immediate population of Killaloe. It does not take account of the combined population of Killaloe and Ballina, or, the combined population of both settlements and the rural hinterland that the existing club membership serves as illustrated in Figure 1. Taking into account the combined requirements of both towns (combined population of 4116), the combined minimum recommendation for playing pitches based on the FIT recommended standard would be 4.9ha. Taking into account the combined requirements of both settlements and the 10-minute catchment population (total population of 6437), a minimum of 7.2ha of playing pitches would be required to meet best practice FIT minimum playing pitch standards.

Based on this analysis, there is a clear requirement for additional playing pitches to serve the operational requirements of Lough Derg FC, and, there is a clear deficiency of appropriately identified land for active open space within the existing settlement plan to meet existing and future population demand.

¹Leixlip Social Infrastructure Audit, 2018, Kildare County Council

² ² The population of the defined CSO settlement’ area for Killaloe illustrated on Figure 2 is 1484

4.0 Recommendations

In light of the demand analysis above and, consistent with National and Regional planning framework which emphasises the importance of the function of open space to community, Lough Derg FC respectfully request that the new settlement Plan acknowledges and provides for additional open recreational space to meet the needs of the local community, and expressly, the provision of additional playing pitches as a recognised openspace typology and, which is accessible for club/community and/or public use.

Quantity

Consistent with best practice recommended minimum pitch sizes, an area of at least 1.5ha is required to facilitate at least two full size playing pitches necessary for Lough Derg FC to fulfil fixture annual obligations and training requirements in addition to its existing club infrastructure. The provision of the new pitches can be sub-divided to provide additional training areas for underage levels. The requirement for additional land, in excess of the identified 1.5ha must be considered where the Council seek to identify communal 'playing pitches' which are accessible to the general public.

Location

In order to build on the current sports hub model and to capitalise on the existing pavilion changing rooms and car parking that is already there, the site for such a pitch would ideally be situated within the Clarisford park area which is familiar and highly accessible to communities on both sides of the River Shannon. The Council will be mindful that this area will become increasingly accessible upon construction of the new River Shannon bridge and Killaloe bypass.

Whilst the existing Killaloe settlement Plan suggest that parts of the area adjacent to Clarisford Park (currently zoned TOU2 Clarisiford/Killestry Tourism Site) "*shall be retained for open space or other water compatible uses*", Lough Derg FC submit that that zoning objective does not lend itself to any automatic and presumptive primary use of that land as active open space or for express use of playing pitches. The Council will be mindful that any 'openspace' use of that adjacent land, under the current development plan provisions, are considered to arise in instances ancillary or surplus to commercial development of that property, and only where such commercial development proposal fails the flood risk management test.

Implementation

It is anticipated that new County Development Plan in its consideration of community infrastructure and open space provision, will recognise the deficiency in open space playing pitches in Killaloe, and, that the development plan will include both strategic and local spatial development and landuse policy objectives that seek to facilitate redress of the deficiency in active open space provision through appropriate landuse planning provisions in its written statement and in the Killaloe settlement plan.

At a strategic level, Lough Derg FC suggest that the provisions of the new Development Plan in its redress of 'Community Development and Social Infrastructure' (Chapter 5 of the current Clare County Development Plan) would; (i) recognise the value and importance of all active and passive 'openspace' typology types, including the provision of playing pitches to the physical and mental well-being of the local community; and (ii) seek to provide for same proportionate to recognised demand,.

At a local level, Lough Derg FC respectfully suggest that specific landuse objectives should be provide which seek to identify, facilitate and/or encourage the provision of such uses in response to demand in Killaloe.