



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

28th March 2022

Re: Submission on draft Clare County Development Plan 2023-2029 with specific regard to lands at Ballyellery, Liscannor, Ennis, Co. Clare.

Dear Sir / Madam,

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our client, Stephanie MacGrath, [REDACTED] to make a submission on the proposed Draft Clare County Development Plan 2023-2029 with respect to lands at Ballyellery, Liscannor, Ennis, Co. Clare. This submission is made in response to the public notice dated 24th January 2022, inviting submissions up until 28th March 2022, in relation to the Draft Clare County Development Plan 2023-2029.

The lands subject to this submission comprise c. 14.5 Hectares of unzoned lands within the countryside of Clare County, as outlined in the below figures, of which 3.06 Ha are under the ownership of our client. The lands are located within undeveloped backlands which are bound by existing residential dwellings. In summary, this submission requests that Clare County Council considers the following:

- We would request that the Planning Authority considers designating the submission lands surrounds as a 'Rural Cluster' within the development plan.

The submission lands are located to the north of Lahinch, Co. Clare. The lands are currently vacant and are adjoined by residential dwellings at each boundary. The lands are considered optimal for residential development. The lands are located within an area which currently accommodates over 40 no. dwellings of various style and design. The lands are located less than 300m north from Lahinch's settlement boundary and approximately 1.5km north from Lahinch town centre. Lahinch is a mid-sized town which provides services, amenities and employment for the immediate area. The town is also a well-established tourisi-destination within West Clare. The lands are also located approximately 2.5km east of Liscannor village, a smaller settlement which also offers a range of tourism-activities.

We request that the recommendations of this submission be given full consideration in the preparation of the forthcoming Clare County Development Plan 2023-2029.



Figure 1.0 Aerial image showing immediate context of submission lands, outlined in red.

The lands are located within an attractive, tourist destination which is within close proximity to a number of tourist hotspots, services and recreational amenities.



Figure 2.0 Drone image showing the context of the submission lands as approached from Lahinch.



Figure 3.0 Drone image showing the submission lands located within undeveloped lands to the rear of several properties.



Figure 4.0 Drone image showing the submission lands located within undeveloped lands to the rear of several properties.

Submission Request

The Clare County Development Plan 2023-2029 seeks to support the orderly and sustainable development of urban and rural areas within the county. In light of these objectives of the development plan, we would like to make a formal submission on the draft plan as follows:

- We would request that the Planning Authority considers designating the submission lands as a 'Rural Cluster' within the development plan.

Basis of Submission

The following section will set out the basis for the submission request. From the outset, it is submitted that the submission lands do not fall within the category of '*open countryside*' due to the large number of existing residential dwellings in the area. Approximately 40 no. dwellings are located within the submission lands, as illustrated below.



Figure 5.0 Aerial image of submission lands which contain a cluster of residences.

As indicated above, the existing residential units result in a cluster of dwellings within a rural area. Due to this, the submission lands are unique and distinct from the typical countryside character which are guided by strict planning guidelines including limiting entrances to sites and ribbon development. The lands have developed a unique character and sense of place. Despite the large number of dwellings clustered in this area, there are several potential development sites which could accommodate additional residential units, particularly backland sites which are located to the rears of dwellings.



Figure 6.0 Aerial image of submission lands which contain a cluster of residences.

As per the draft Clare County Development Plan 2023-2029, the submission lands maintain the previous zoning objective of ‘Countryside’ lands under Strong Urban Pressure.

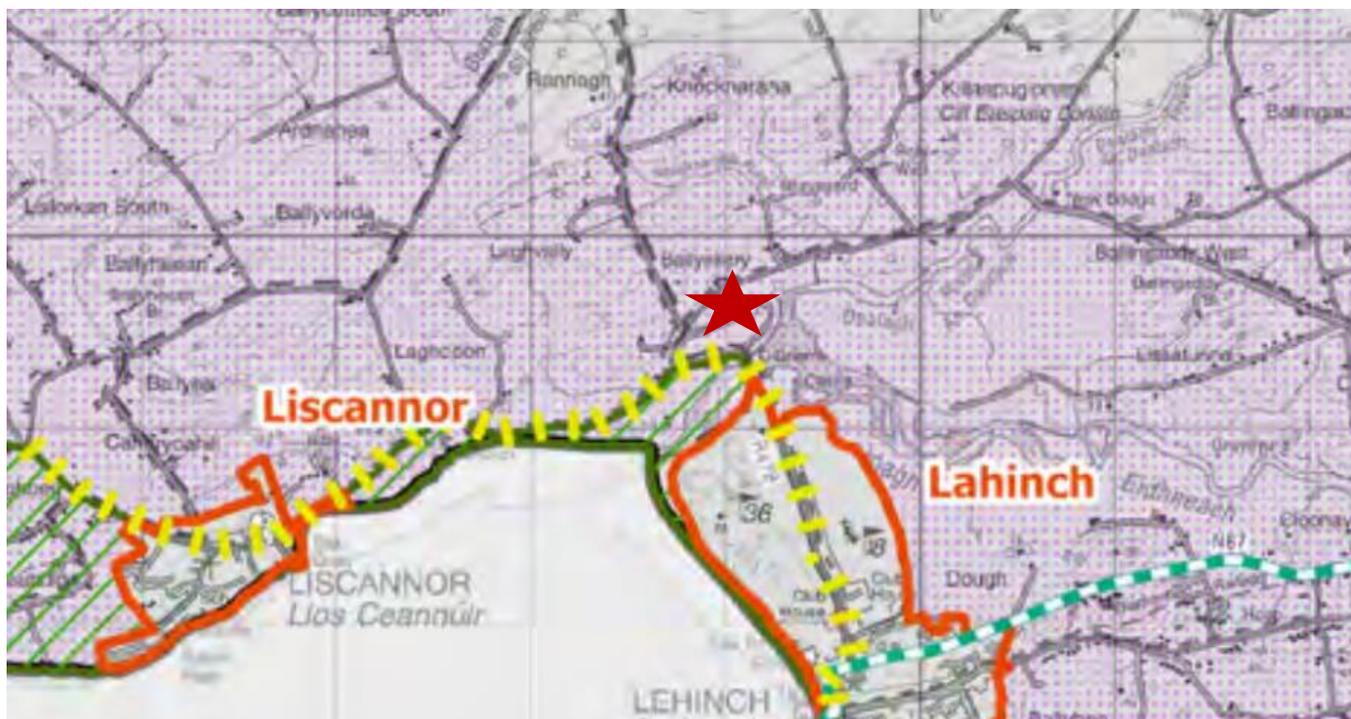


Figure 7.0 Extract from Map H3 ‘Areas of Special Control’ in the draft Clare County Development Plan 2023-2029, showing the application site, denoted by a red star, located within a ‘Rural area under strong urban pressure’.



In addition to maintaining the existing zoning provision, the submission lands also continue to be designated under the Settlement Hierarchy as the 'countryside'. The draft Clare County Development Plan also prescribes a list of 'rural clusters' which are settlements smaller than a village but contain groups of residential dwellings. The draft plan states that:

'These are the smallest type of settlement in the hierarchy and their character reflects traditional building patterns with a loose collection of rural dwellings clustered around one or more focal points.'

'The strategy for these settlements is to facilitate a small number of additional dwellings and/or small enterprises to consolidate the existing pattern of development around the focal points and utilise existing services in the area. To meet the needs of those wishing to settle in rural areas, the provisions of Objective CDP 4.14 (i.e. Social or Economic Housing Need requirement) will not apply to applicants for single houses within the designated cluster boundaries.'

In relation to clusters, the following objective of Clare County Council is noted:

CDP 4.9 *To ensure that clusters throughout the County maintain their existing character providing only for very small scale growth of dwellings and/or small enterprises where they can be suitably integrated with respect to the setting and context*

The following figure demonstrates the proposed clusters as per the provisions of the draft Clare County Development Plan 2023-2029:



Figure 8.0 Extract of draft Clare County Development Plan 2023-2029 demonstrating the list of Clusters contained within the Settlement Hierarchy.

The draft Clare County Development Plan introduces commentary on 'Settlement Networks' and recognises that the development of inter and/or multi settlement relationships presents opportunities for collaborative projects with shared benefits so as to fully harness the potential of opportunities and the management of challenges.

The draft plan defines settlement networks as the following:

'groupings of towns and villages (including cross boundary) which share geographic location, economic assets and other resources and which contribute specialisms which if combined can provide a strategic opportunity to drive the regional economy.'

The following policy is noted:

CDP 4.11 *It is an objective of Clare County Council: To support the concept of settlement networks, to assist collaborative projects and the sharing of assets and strengths, to enhance the viability of County Clare's towns, villages and rural communities in order to facilitate the maintenance and expansion of existing population levels, services and roles.*

The submission lands contain a cluster of dwellings which are closely entwined with the settlement of Lahinch. Accordingly, it is considered that there is capacity to provide for additional residential development on the submission lands at an appropriate scale which encourage a settlement network. It is also considered that the recognition of the existing rural cluster at Ballyellery and its designation as a 'cluster; under the next Clare County Development Plan 2023-2029 accords with the principles of proper planning and sustainable development.

Conclusion

This submission is prepared in response to the Draft Clare County Development Plan 2023-2029 in preparation for a new development plan for the county. In summary, this submission requests that Clare County Council considers the following:

- We would request that the Planning Authority considers designating the submission lands surrounds as a 'Rural Cluster' within the development plan.

The submission lands are located within a rural area which contain a large number of one-off residential dwellings. Over 40 no. houses are within the immediate setting with additional dwellings being located in the wider area. The lands are not considered to fall within the category of 'open countryside' due to the level of existing dwellings and their location at the settlement boundary of Lahinch. It is considered that the designation of Ballyellery as a rural cluster under the Clare County Development Plan 2023-2023 is an appropriate consideration.

We trust that the Planning Authority will have regard to the contents of this submission in the adoption of the Clare County Development Plan 2023-2029.

Regards,



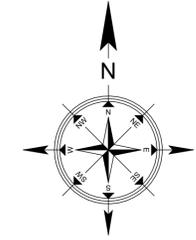
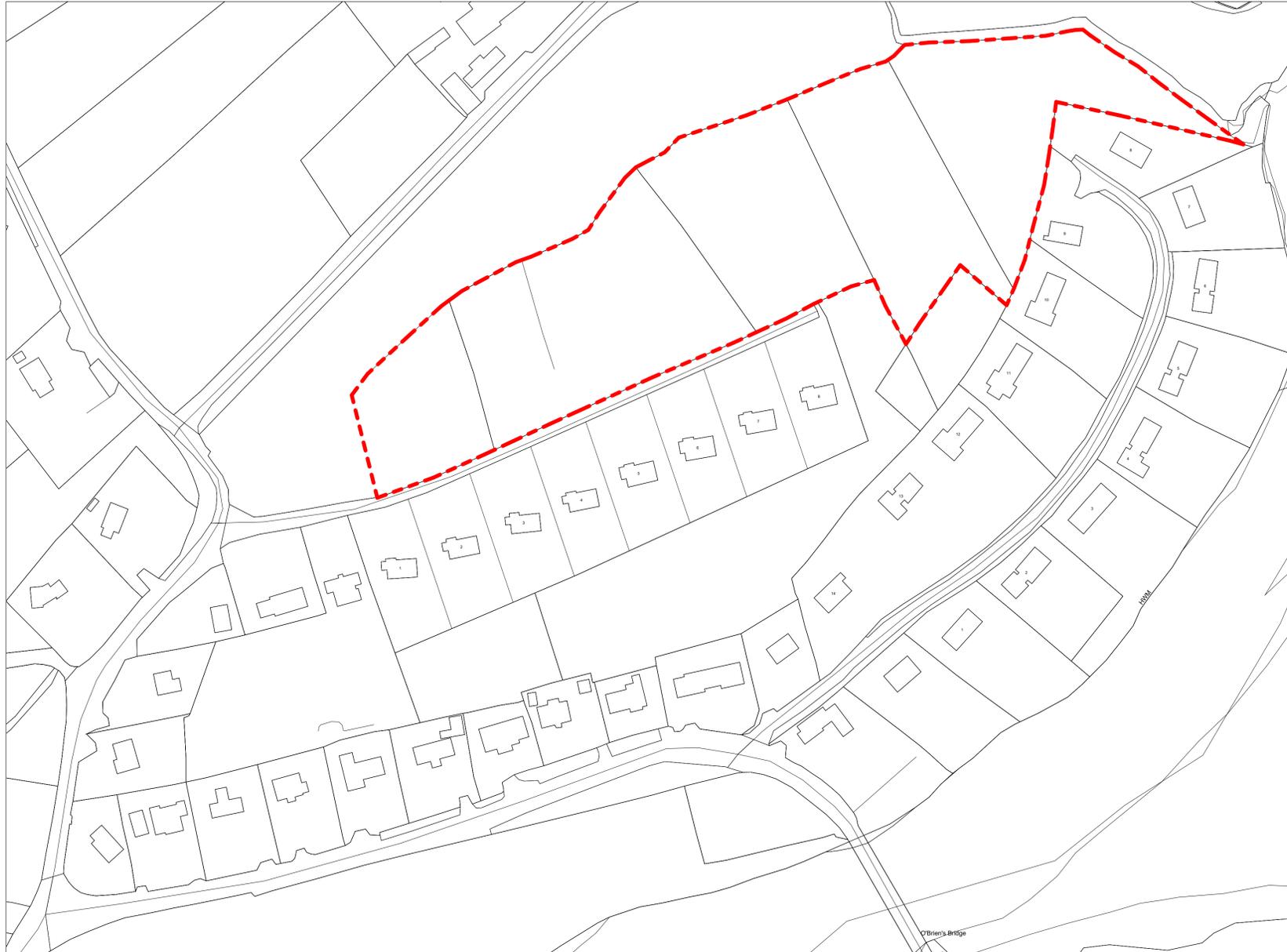
Kevin Hughes MIPI MRTPI
for HPDC Ltd.

Appendix A

Site Location map demonstrating the lands within the submission lands which are owned by our client.

SITE PARTICULARS

**TOTAL SITE AREA EDGED IN RED = 3.06 HECTARES
DIGITAL OS MAP SHEET : 4083-A**



PL00 SITE LOCATION MAP
SCALE (@ A1): 1 : 1250 / SCALE @ A3 = 1 : 2500
PRELIMINARY
DATE: MARCH 2022

OS MAP OF SITE AT
BALLYELLERY, LISCANNOR, Co. CLARE

	DAVID H. LEAHY ARCHITECTS	
<small>No. 1, RIVERPOINT, LOWER MALLOW St., LIMERICK TELEPHONE: +353 (0)61-404400 E-MAIL: info@dhlarchitects.com</small>		