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CUNNANE STRATTON REYNOLDS

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

28th March 2022

Online Submission

**Re: Submission on the Draft Clare County Council Development Plan 2023-2029
Submission on Lands Zoned TOU2 in respect of mobile homes**

Dear Sir / Madam

We make this submission on behalf of Mr Michael McHale, Killaloe, Co. Clare to the Clare County Council Draft Development Plan 2023 - 2029 in relation to lands zoned TOU2 on the zoning map for Killaloe, Co. Clare.

We request that the Council consider expanding the criteria for visitor accommodation under Tourism in the Draft County Development Plan to include provision for long- and short-term stays relating to mobile home parks.

Our client's land is located on the northern shores of the River Shannon just south of Killaloe town in Co. Clare. The core strategy designates our client's land as TOU2 which is identified for tourism development having regard to its strategic location adjoining the town of Killaloe and its proximity to the River Shannon and Lough Derg. The zoning recognises the potential of these lands to accommodate development that will significantly contribute to the tourism industry at both a local and regional scale. The location of our Client's land designated as TOU2 in the Core Strategy within the Draft Development Plan is illustrated in Figure 1 below:

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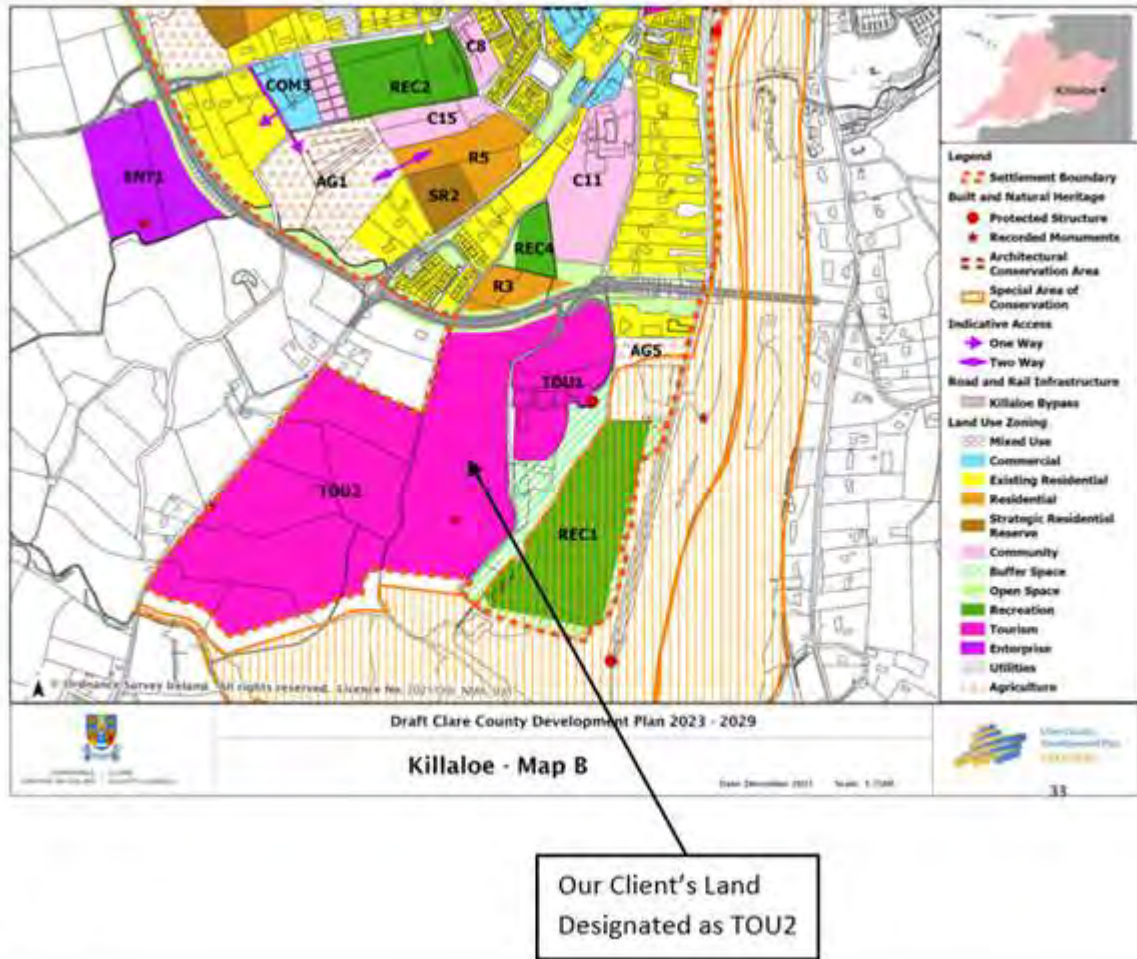


Figure 1- Our client's land designated at TOU2 from Clare Draft Development Plan 2023-2029

Our client is considering the establishment of a long term mobile home park on their site designated as Tourism and we would request that a revised objective in the County Draft Development Plan state the following:

'The land zoned for tourism is suitable for a range of tourism uses including a mobile home park for short- and long-term stays'.

The reason for our client's submission is that The Clare County Draft Development Plan 2023-2029 does not refer to long term stays in emerging Development Plan Objective 9.5 under the visitor accommodation section on tourism. Development Plan Objective 9.5 states:

'It is an objective of Clare County Council to:

- a) To promote, encourage and facilitate the provision of new visitor accommodation and the expansion/upgrade of existing hotels, guesthouses, B&Bs and other tourist accommodation at appropriate locations throughout the County;*
- b) To support the redevelopment of brownfield sites, both in settlements and in rural areas, for the provision of tourist accommodation; and*

c) To support the development of new camping and glamping facilities and facilities for campervans/motor homes/touring caravans both within settlements and in rural locations at a variety of locations across the County. Sites in rural locations should be located in close proximity to, and have good connectivity to existing tourism assets.'

The allowance for short- and long-term stays would bring benefits and would have a positive knock-on effect to the local economy and tourism in particular in proximity to our client's site. This would allow for:

- Minimal maintenance associated with the running of these mobile homes,
- An ideal location in close proximity to the amenities on this part of the River Shannon and to Killaloe.
- Longer Term stays in this area which would guarantee the regular return of visitors a number of times throughout the peak season.
- A community of long-term holidaymakers would help build up a sense of community within the site.
- The re-occurring return of long-term stays would have a positive effect on the local economy as many of these holidaymakers would spend their money in the local economy such as restaurants, shops.
- Furthermore, a continuous and regular flow of residents would result in tourism-based activities such as water sports on the river being used on a regular basis and would potentially allow for the provision of further services being set up to accommodate a demand accumulated by regular holidaymakers to the area.

Furthermore, the minimal maintenance associated with a mobile home park would be compliant with the following criteria of the TOU2 of the Core Strategy:

- *The lands zoned TOU2 are adjacent to the Lower River Shannon SAC (Site Code 2165). Given the extent of the area zoned for 'Tourism' at Killestry, it is imperative that there are no significant impacts on the adjacent ecologically sensitive shoreline. adjoining Lower River Shannon SAC (Site Code 2165).*
- *Proposals for development on the site must demonstrate that suitable services and infrastructure, particularly relating to water supply and wastewater infrastructure, can be provided to serve the proposed development.*

In respect of mobile home development an additional requirement could be added namely that landscape and visual assessments will be required to support mobile home developments.

Furthermore, a long-term mobile home park would also be compliant with the previously mentioned Draft County Development Plan Objective 9.5 Part (c) as this will provide for a new mobile home

facility in a rural location in close proximity to a number of tourist facilities along this part of the River Shannon and Lough Derg as well as connectivity to Killaloe town.

In summary, we would request that Clare County Council recognize the provision of long-term mobile home park stays in support of emerging development plan objectives on visitor accommodation.

We ask that we are included on any mailing list that is created to provide updated on the plan making process (ccostello@csrlandplan.ie).

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,



Killian Whyte

CUNNANE STRATTON REYNOLDS

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