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Planning Department  
Clare County Council  
New Road  
Ennis  
County Clare

28<sup>th</sup> March 2022



**RE: Submission on proposed revisions to development plan, 2023 through 2029.**

Dear Sir/Madame,

I wish to make the following submission in respect of the proposed revisions to the Clare County development plan for 2023 through 2029.

**1. Core Strategy, Chapter 3.**

- 1.1. I wish to propose that in respect of all smaller towns and villages, where the core strategy allocation of the previous plan 2017 through 2023 in respect of those towns and villages has not been achieved either in terms of house completions or in terms of planning permissions extant, that the previous allocation be added to the upcoming allocation.

This should also apply to the allocation of housing to the rural areas of the county in the Core Strategy.

The procurement of housing in smaller towns can be very difficult to achieve, particularly where the number of sites that have been zoned for residential use is small in number. In order to achieve sustainable growth in smaller centres, it is necessary to ensure that they do not fall behind, and very often the six-year term of a development plan can be too short a period to achieve the development of a zoned site. Therefore it is appropriate that the previously zoned land, if it has not been developed under the previous housing allocation, should continue to be zoned in addition to other lands

zoned to accommodate the proposed population growth over the forthcoming 6 years.

- 1.2. I also wish to suggest in respect of the smaller towns and villages, where it can be difficult to ensure that land is brought forward for planning permission applications, and where if even one portion of a small amount of land zoned is not brought forward for development this can preclude the achievement of the core strategy target, that the amount of land zoned in each case be increased so that a minimum of twice the estimated necessary land is actually zoned, and secondly that each individual site zoned should be examined in advance by the planning authority to determine whether there are any issues which would preclude development at the densities suggested in the Core Strategy.

It can frequently happen that while an adequate quantum of land has been zoned to accommodate proposed population growth, that during an application process, difficulties may arise with a particular site either from a technical point of view or from the point of view of protection of third-party amenities, and thus the land zoned is not granted planning permission, possibly because of the refusal by the Board. Frequently such difficulties cannot be anticipated at the zoning stage. This has often led to bottlenecks in smaller towns whereby population targets cannot be met due to a failure to zone a sufficient amount of suitable land.

## **2. Housing, Chapter 5.**

The facilitation of increased housing within central town areas is stressed in several specific policy proposals of the proposed plan. (See also CDP 17.7). The development of brownfield sites and the conversion within existing buildings of upper areas over commercial premises is also stressed. Many towns have a target of 30% of the Core Strategy allocation being provided within the central areas of those towns.

- 2.1. One of the difficulties in providing for the conversion of existing commercial premises or in converting upper floors over existing ground floor and offices is that of providing private open space in accordance with government guidelines for new apartments and also in providing car parking spaces as required under the development guidelines section of the proposed plan. Frequently, commercial buildings will have no access to open space, and certainly rarely at a level sufficient to enable conversions to take place if the open space standards are applied. Similarly, they may not be able to provide levels of car parking required within the development plan. For these reasons

I would suggest that development contributions would be made in lieu of provision of private open space and of car parking spaces where site and building constraints do not allow for such provision. This is standard procedure in many planning areas and I believe it should be specifically referenced in the proposed plan.

- 2.2. Another alternative in respect of the conversion of existing buildings to residential use would be to seek that the proposed apartments are provided above minimum standards of floor area, with the excess area being regarded as a private recreation though not an open- space recreation area.

### **3. Tourism, Chapter 9.**

Outside of Wild Atlantic Way the largest concentration of scenic Routes in the county is in the area of the Burren stretching down from Ballyvaughan to the north Clare Lake-lands area around Corofin. I suggest that a specific effort be made to introduce a tourism route bringing tourists from the Wild Atlantic Way through this area.

### **4. Development Management Guidelines, Appendix 1.**

- 4.1. I suggest that a target be set for the provision of rapid charging for electrical plug-in points in public car parks to provide 50% coverage for all public car spaces by the end of the plan period.
- 4.2. I also suggest that the car park standards, particularly for town centre areas, are still very high when one takes into account, for example, the proposed 10-minute-town strategy proposal under the Ennis 2040 Spatial and Economic Strategy.
- 4.3. I point out, under A1 6.3, that the requirement for 2.5 m wide car parking bays is above that recommended under DMURS, and that this can create difficulties in terms of ensuring adequate car park provision and achieving required housing densities.
- 4.4. In regard to lifetime adaptability for housing the plan suggests a requirement of providing a level accessible shower and toilet to the ground floor of all houses. This is quite a substantial requirement and is well in excess of part M of the building regulations. It is in particular a somewhat onerous requirement when one is dealing with the provision of low-cost housing or housing for

example below 50 m<sup>2</sup> area on the ground floor. The requirement for both a level access shower and a fully accessible toilet can have the impact of significantly increasing the ground floor footprint and have a knock-on effect on the overall house cost. Can I suggest that in a situation where the ground floor is less than 60 m<sup>2</sup>, that this requirement be replaced with the requirement which would indicate how an accessible shower could be accommodated by the provision of a future extension to the ground floor area. This is, after all, a matter of long-term adaptability and it is something which is generally not necessary where a young couple are seeking to house themselves in a starter-home without incurring undue cost.

## **5. Brownfield and Infill Site Development. (Page 446).**

- 5.1. Can I suggest that in the last sentence of the first paragraph indicating that a flexible approach will be taken by the planning authority in regard to single uses for sites zoned as mixed-use would be extended to include infill sites as well as brownfield redevelopment so that the initial part of the sentence would read

*"due to the potential additional issues associated with brownfield redevelopment and development of infill sites relative to the development of other locations, a flexible approach may be taken by the planning authority....."*

It is often the case that small infill sites face the same difficulties as brownfield sites in terms of development and that achieving the separate uses required of mixed use zoning can be difficult.

- 5.2. Can I also suggest that the term "brownfield" be defined and that it include reclaimed land in town Centre locations? Frequently, small sites were reclaimed from riverbanks or from former floodplains and these should be considered as brownfield.

## **6. Mixed-Use (Page 429).**

Under the description of "mixed-use" I suggest the following paragraph be added:

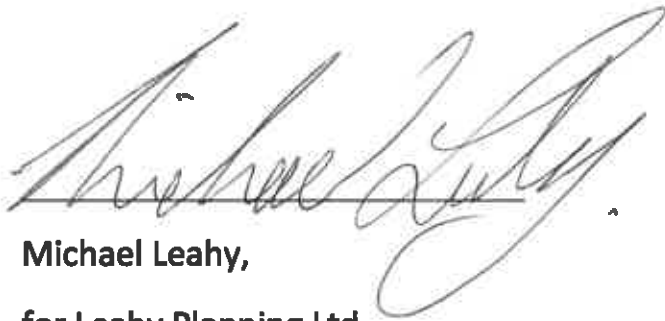
"The Planning Authority recognises that in smaller sites at edge of town locations a variety of uses may not be possible or economically feasible and

where single use is justified by the applicant/developer the Planning Authority may take a flexible approach on this matter."

Particularly in smaller sites, the development of commercial space at a feasible level as required by modern usage and legislation can be difficult to achieve. The adoption of a more flexible approach on this matter is likely to see a greater level of uptake on these sites where zoned for mixed use.

I trust that you will take this submission into account, and I would be obliged if you could acknowledge receipt of this submission quoting the relevant reference number to the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Leahy', written over a horizontal line. The signature is fluid and cursive.

Michael Leahy,

for Leahy Planning Ltd.