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

3<sup>rd</sup> January 2023

**RE: Proposed Amendments to the Draft Clare County Development Plan  
2023-2029.**

**SRA File Ref: 20/009**

A Chara,

I refer to your Notice of the publication of Proposed Material Alterations to the Draft Clare County Development Plan 2023-2029 received on 28<sup>th</sup> November 2022.

The Southern Regional Assembly (SRA) welcomes this opportunity to comment on the Proposed Amendments.

The SRA commends the continued work undertaken in the preparation of this Draft Plan and the amendments to strengthen its policies and objectives. The observations set out below are focused on the published material amendments and are intended to assist the Council in achieving successful alignment of the Development Plan with the Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy (RSES), Limerick-Shannon Metropolitan Area Strategic Plan (LSMASP) and National Policy Objectives of the National Planning Framework (NPF).

It is noted that a large number of the Proposed Amendments relate to additional references or considerations which are relatively minor edits. Therefore, the following comments focus on the more significant Material Alterations.

## 1.0 Core Strategy and Municipal District Settlement Plans

The following comments relate primarily to the amendments to *Chapter 3 Core Strategy* and the *Municipal District Settlement Plans* set out in *Volume 3*. However other sections of the *Proposed Amendments* document may also be referenced, where they relate to these objectives.

### 1.1 Proposed Amendments Impacting the Achievement of Compact Growth Targets

The primary concern of the Regional Assembly is to ensure that the principles set out in the Development Plan align with the NPF, RSES and LSMASP in order that Clare can maximise its potential and investment under Project Ireland 2040 and the National Development Plan, and to ensure its transition to a more sustainable settlement pattern based on these principles.

There is concern that the amended Core Strategy Table in *Chapter 3 Core Strategy*, the associated additional land zoned for residential purposes as well as the expanded settlement boundaries set out in *Volumes 3 (Municipal District Settlement Plans)* do not address:

- *Recommendation 1: Settlement Strategy* and *Recommendation 5: Achieving Compact Growth Targets* of the SRA's submission to the Draft Plan,
- would be contrary to the principle of Compact Growth, and
- would not accord with *RPO 3 Local Authority Core Strategies* of the RSES.
- *RPO 34 Regeneration, Brownfield and Infill Development* is also relevant and states that *in pursuit of the NPF's NPO 3a, 3b & 3c, the Development Plan Core Strategy should be accompanied by specific objectives setting out the achievement of urban infill/brownfield development. RPO 35 Support for Compact Growth* outlines how development plans shall set out a transitional minimal requirement to deliver at least 50% of all new homes in the region's three cities and suburbs within their existing built-up footprint and 30% in settlements other than cities and suburbs.

The following points are noted:

- The overall population target for County Clare between 2023-2029 has been revised to 7,391 from 11,637 shown in the Draft Plan, in order to show better alignment with the NPF/RSES. However the number of housing units proposed appears to remain the same at 4,500 resulting in a reduction in average household size from 2.6 to 1.6. The rationale for this is unclear.
- An additional figure of 9,231 (identified as population target to include *Unmet Population*) and housing target of 5,760 units (identified to cater for this *Unmet Demand*), is also included. The rationale for the inclusion of this figure is unclear and it is noted that the methodology for the application of NPF population and housing projections into local authority plan processes, as per Department Guidelines, already incorporates provision for unmet demand. It is noted that the table also includes additional provision for zoned land at 25% across the county. Section 5.0 *Population Projection* of the LSMASP, allows for 25% headroom within the County Clare portion of the Limerick-Shannon Metropolitan Area, and Section 4.4.3 *Ensuring Sufficient Provision of Housing Land/Sites* of *Development Plans Guidelines for Planning Authorities (DoHLGH, June 2022)* does recognise that it may be necessary to zone more land than precisely required for that settlement subject to certain criteria. It is unclear therefore why this additional land has been included in addition to the 25%

headroom already applied or what criteria and evidence base has been applied for the additional headroom used as required by the Guidelines. The Planning Authority is requested to address this point.

- The amount of greenfield land stated as being required including the additional provision is 166 hectares, while the land requirement provided for including *Unmet Demand* is 215 hectares, however 258 hectares is stated as the actual amount of land zoned. Therefore it appears there is a mismatch between the population targets used, the level of land indicated as required and the amount of land provided for.

Based on these points, there is a concern in relation to the proposed amendments to the Core Strategy by reference to:

- A mismatch between the proposed population targets, housing units proposed and associated level of zoning allocation which will impact on the achievement of the compact growth targets set out in the NPF and RSES.
- The inclusion of unmet demand and additional zoning where the rationale is not clear and where the relevant guidelines already account for unmet demand.
- Provision of additional zoned land well in excess of the population targets without a demonstrated evidence base.
- Reduction in compact growth targets.

There is concern that the amendments have not strengthened the Core Strategy and have the potential to undermine the intended sustainable impact of the Development Plan. The amendments as outlined above appear not to be fully aligned with RPO 3 *Local Authority Core Strategies*, RPO 34 *Regeneration, Brownfield and Infill Development* and RPO 35 *Support for Compact Growth* of the RSES.

## **1.2 Limerick-Shannon Metropolitan Area**

In terms of the Metropolitan Area (which includes the Clare portion of Limerick City and Suburbs), the LSMASP contains a shared ambition and purpose for the Metropolitan Area as provided for in the NPF, which benefits both Clare and Limerick City and County Councils. The ambition for the Metropolitan Area is set out in *Limerick-Shannon MASP Policy Objective 1, to strengthen its role as an international location of scale, complement to Dublin and a primary driver of economic and population growth in the Southern Region.*

The following points are noted:

- The SRA notes and welcomes the addition of the title *Limerick-Shannon Metropolitan Area* to *Volume 3b Shannon Municipal District Settlement Plans*, as well as the additional text provided within this volume describing the area, to address *Recommendation No. 2: Limerick-Shannon Metropolitan Area* of the SRA's Draft Plan submission. In order to give better expression to the importance of the MASP, to reflect its statutory status and to provide a platform for Clare County Council to maximise its potential for investment under the NDP, the local authority are encouraged to give greater emphasis in the final plan to the MASP and the opportunities it presents for Clare. This could be undertaken as non-material amendments.
- The population target for the plan period has been revised to 1,971 with 31.42ha. of greenfield land stated as being required to meet this target. With the addition of the 25% headroom, this land requirement is stated as 40.97 ha. and 47.30 ha. including *Unmet Demand*. However the amount of land zoned is stated as 28.56 ha. It is unclear

why the amount of land zoned for the Metropolitan Area is lower than the stated requirement. The resulting density figures appear to be low in this context, particularly in areas which are serviced by public transport, such as Shannon Metropolitan Town and Sixmilebridge. The Planning Authority should therefore consider if the amount of land zoned is sufficient to meet RSES/MASP objectives and if Compact Growth considerations have been appropriately applied in terms of the land zoned for residential use.

- A key priority for the Metropolitan Area is the planning and sustainable development of Limerick City and Suburbs. While it is located in two functional areas, it shares services such as schools and infrastructure. An aggregate figure for the Clare portion of the Limerick City and Suburbs has not been included in the amended table, which contains additional area to the defined centres of Athlunkard and Parteen shown. This makes full assessment of the figures difficult. The population projection for Limerick City and Suburbs (Clare portion), based on the LSMASP would be circa 652 over the 6-year plan period. However the population projection for Athlunkard and Parteen shown in the amended table is: 221 (176 and 42 respectively); or 317 (227 for Athlunkard and 90 for Parteen) including *Unmet Population*. The Regional Assembly notes the rationale given for not applying this target, and accepts that there are currently physical constraints. However given the strategic priority given to the development of the Limerick City and Suburbs (including that within Clare) within the NPF and the RSES and the priority given to the achievement of compact growth, it is considered that there should be greater recognition given to the future development of this area . There is also concern that all of the housing units are shown to be delivered on greenfield land with none identified through *Compact Growth/Infill/Brownfield*. The Planning Authority is advised to investigate further the potential for infill or brownfield development within this area. The *Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)* is also relevant and Section 12.1 *LSMATS Land-Use Priorities* of the Strategy outlines how *Clare County Council must look to target higher densities and mixed-use developments in areas where opportunities exist for sustainable transport provision and in a manner that better aligns the provision of transport with demand. This will entail the implementation of Public Transport Oriented Development (PTOD) principles.*

## 1.5 Ennis

Ennis is one of six Key Towns in the Southern Region defined as having a very significant population scale and playing a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. *Section 3.5 Key Towns* of the *RSES* states that *these Key Towns are self-sustaining regional drivers and have a comparable structure to the five regional growth centres identified in the NPF. Given their considerable scope for growth, it is envisaged that local authorities should plan for population growth of more than 30% by 2040.*

The following points are noted in this regard:

- The population target for Ennis between 2023 and 2029 is 2,480 or 3,456 including *Unmet Demand*. It is difficult to ascertain if population projections are in line with the

30% growth envisage by 2040 as this has not been set out in the Table. The Planning Authority are requested to address this point.

- In terms of compact growth, RPO 35 (c) requires a minimum of 30% of all new homes to be located within the existing built-up footprint. The green field land requirement including the additional 25% headroom is stated as 58.9 ha. The requirement including *Unmet Demand* rises to 77.44 ha. However the total amount zoned is stated as 99.67 ha. It is unclear how this additional, zoned land could fulfil the criteria of meeting the 30% compact growth criteria for Ennis if it could be adequately serviced or would be serviceable within the six-year plan period if it would be served by public transport or is in proximity to services and facilities. The Planning Authority should review the extent of land proposed to be zoned for residential in this context.
- The density figures provided also appear low and appropriate locations for increased densities could be considered further in the town centre, other brownfield sites and along public transport corridors. Overall there is concern regarding the extent of land zoned for residential use in peripheral locations in Ennis, which would make it difficult to achieve its compact growth targets.

## **2.0 Climate Action**

The SRA notes and welcomes the proposed amendments in relation to Climate Action which strengthen policy in this area. This includes an additional goal in Chapter 1 *Introduction and Vision* regarding the transition from a linear to a circular economy and the additional text on *the Just Transition Approach* in Chapter 2 *Climate Action*. RPO 38 *EU Action Plan for the Circular Economy* of the RSES supports the work of local authorities to implement the Action Plan at local level and sets out policy context in this regard.

## **3.0 Economic Development and Enterprise**

The additional text to Chapter 6 *Economic Development and Enterprise* acknowledging the principles set out in the *Regional Economic Strategy* of the RSES, is welcomed including the text on smart specialisation, clustering, placemaking for enterprise development, knowledge diffusion and capacity building, which was mentioned in *Recommendation 6: RSES Economic Principles* of the SRA's submission on the *Draft Plan*. The amended text on the *Regional Enterprise Plan to 2024 for the Mid-West* and section on *Higher Education Institutes, the Knowledge Economy and Access to Talent* is also noted and welcomed.

## **4.0 Sustainable Mobility and Transport**

Section 6.0: *Integrated Land Use and Transport* of the *LSMASP* sets out the principles underpinning the MASP including the effective integration of transport planning with spatial planning policies, from regional to local level and the alignment of associated transport and infrastructure investment. The amended text to Chapter 10 *Sustainable Communities* strengthening policy in relation to sustainable transport including the requirement of access by walking, cycling and public transport for primary and secondary schools is welcomed. The amended text to Chapter 11 *Physical Infrastructure, Environment and Energy* in relation to the 10-minute town concept, increasing densities, consolidating development around existing and proposed public transport facilities and pedestrian permeability in new development areas is also noted. The additional text on the *Five Cities Demand Management Study*, support for expansion of the bus network including Limerick BusConnects and updated text in relation to the *Limerick-Shannon Metropolitan Area Transport Study (LSMATS)* as well as the updated text on the Shannon Rail Link, identified in RSES is welcomed.

## **5.0 Environment and Blue Green Infrastructure**

Amendments to *Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure* including reference to *Blue* as well as *Green Infrastructure*, helps to address the issue outlined in *Recommendation 9: Environment* of the SRA's Draft Plan submission, by assisting alignment of the Plan with Chapter 5 *Environment* and *RPO 123 River Basin Management Plan and Spatial Planning* of the RSES and Section 3.2 *Guiding Principles* of the LSMASP.

## **6.0 Environmental Assessment**

We note the preparation of *Volume 10a&b Addendum to Environmental Assessments*, as well as *Volume 10c Strategic Flood Risk Assessment* published alongside the proposed Material Alterations to the Draft Plan.

The Planning Authority should note that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Clare County Council review these documents to inform the Council's own environmental assessments of proposed material alterations and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final County Development Plan where relevant.

## **7.0 Section 12(5)(aa) Notice- Response**

The SRA notes the notice prepared in accordance with Section 12(5)(aa) of the Planning and Development Act 2000, as amended, in which Clare County Council has decided not to comply with the following recommendations of the SRA's submission on the Draft Plan:

- *Recommendation 1* relates to the Core Strategy population figures for Limerick City and Suburbs and the remainder of the Metropolitan Area. The Council cites infrastructural deficiencies and physical constraints as to why these areas cannot facilitate the growth envisaged by the RSES. Unforeseen challenges including the humanitarian response to persons arriving in Ireland, fleeing the conflict in Ukraine and subsequent accommodation requirements, as well as the preliminary CSO 2022 Co. Clare population figure, which is higher than the NPF target for 2022 are reasons given, as to why housing demand is over and above the NPF, RSES and HST methodology. The Regional Assembly acknowledges these constraints, however it is considered that due recognition should be given to the priority given to the development of Limerick City and Suburbs (including that portion within County Clare) in the NPF and hence provide a platform to maximise the public investment to the area and that this would be to the benefit of the local authority.
- In relation to *Recommendation 4* of the SRA's submission on rural clusters, the Council states that it is proposed to extend the boundary of a number of clusters, which have historically been included in the Clare County Development Plan. The SRA retains its concerns regarding this approach in so far as it relates to the Proposed Amendments and the achievement of Compact Growth targets.
- *Recommendation 5*: In terms of density standards for Limerick City and Suburbs, the Planning Authority states that Athlunkard has severe infrastructural constraints and the maximum appropriate land has been zoned at this location, while Parteen Village cannot facilitate a very high density of development considering its nature as a

traditional village settlement. In terms of Ennis and Shannon a broad-brush approach to growth in population and associated density requirements is also considered unreasonable and that zoning for low density at appropriate locations within both towns will provide a real alternative to the rural housing option.

- *Recommendation 7:* the Council states that in terms of setting out Sustainable Mobility Targets, the current modal share data is used as a baseline and that the share of travel by non-car modes of transport would increase during the lifetime of the plan. Once the relevant results of the 2022 Census and subsequent Census are available, the Council will be in a much better position to set realistic mode share targets in the next development plan.
- *Recommendation 8:* the Council states that in terms of public transport network planning, the LSMATS Implementation Plan includes the design phase of BusConnects Core Bus Corridors and Services, as well as the development of the Phase 1 Rail Network and that it is not possible for the CDP Core Strategy to pre-empt the implementation of LSMATS in that regard.

The SRA notes the response of the Planning Authority to the issues set out and recommends that the comments outlined above to the proposed amendments are given full consideration, in order to achieve greater alignment with national and regional policies in this regard. It is considered that this approach will optimise the potential for the local authority to achieve investment under the NDP.

## **8.0 Conclusion**

The SRA welcomes the publication of proposed material alterations to the Draft Development Plan and commends the Planning Department on the inclusion of Amendments which address key RSES Strategy policy objectives through their inclusion in the Draft Plan.

These observations are provided to assist and strengthen policy objectives and to strengthen alignment between the Draft Development Plan and RSES Strategy.

Further engagement between the SRA as a key stakeholder and the Planning Department of Clare County Council in the final phase of the Draft Development Plan is encouraged.

The RSES team is available for further consultation and for any clarification required regarding this submission.

**Mise le meas,**



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David Kelly

Director, Southern Regional Assembly

