



COMHAIRLE | CLARE  
CONTAE AN CHLÁIR | COUNTY COUNCIL

Mr David Kelly,  
Director,  
Southern Regional Assembly  
Assembly House  
O'Connell Street  
Waterford X91 F8PC

11th October, 2019

**Re: Clare County Council's Submission on the Proposed Material Amendments to  
the Draft Regional Spatial and Economic Strategy**

Dear David,

I welcome the opportunity to comment on the Proposed Amendments to the 'Draft Regional Spatial and Economic Strategy for the Southern Region' (RSES). Clare County Council has consulted with our Elected Members and the comments below reflect the detailed and considered input of the Elected Members and Executive of Clare County Council.

Clare County Council welcomes the inclusion in the Draft RSES of supporting text and objectives to key national enablers and strategic assets - projects in County Clare which have the potential to unlock significant economic opportunities for Ireland - in particular the RSES support for the Ennis 2040 Strategy, the planned South Clare Economic Strategic Development Zone (SDZ); the early delivery of Limerick Northern Distributor Road (LNDR); the support for the Moneypoint and Cahercon through the SIFP for the Shannon Estuary; the maximising opportunities for Shannon Town and Shannon International Airport; and the vision for County Town of Ennis through Ennis 2040, all set within a County which has a spectacular heritage and quality of life.

The Council sees the Regional Spatial and Economic Strategy as heralding a new era of developing public planning policy in Ireland and the merging of economic and spatial planning in a visionary plan-led manner. Noting also that the RSES will form the basis for implementation structures and mechanisms, Clare Council considers the final RSES document should be ambitious, positive and realistic, enabling Counties and regions achieve their ambition whilst also being capable of achieving 'early-wins'. The comments from Clare Council on the proposed amendments to the Draft RSES herein attached reflect this approach. The comments are set out in the order as they appear in the proposed Amendments:

**Material Amendment No. 4** – Clare County Council welcomes the reference to Galway Metropolitan Area in the New PRO B having regard to the close ties and links Co. Clare has with Galway City and County.

**An Roinn Pleanála  
An Stiúirtheacht Forbairt Gheilleagrach**

Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

**Planning Department  
Economic Development Directorate**

Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2

Material Amendment No.6 – Clare County Council welcomes the distinction between the large Key towns of scale such as Ennis, Kilkenny, Carlow, Tralee, Clonmel and Wexford and other key towns, and the reference that these are “self-sustaining regional drivers”.

Material Amendment No.7 – The identification of Ennis as one of the six Key Towns to be given “comparable structure to the five regional growth centres identified in the NPF” is very welcome. This corresponds with the development aspirations that the Local Authority have for Ennis and which are evident in the Ennis 2040 Economic and Spatial Plan.

Material Amendment No.8 – in generally supporting the proposed amendments, we request the reference to “including historic growth levels” be omitted. For a variety of reasons, in particular recent downturn in economic climate/recession and the restrictions due to availability of wastewater/water services, some key towns may not have achieved their development opportunity and potential to date. Reference to historic growth levels, may unnecessarily inhibit growth potential.

Material Amendment No.11 – The RSES support for the implementation of Ennis 2040 is very welcome in RPO 14.

Material Amendment No.21 – Given the predominant rural nature of County Clare the issue of developing a sustainable rural housing policy within the Planning Authority is critical. In this regard it is requested that the publication of the National Guidelines relating to Rural Housing would be prioritised in the coming months. It is hoped that these Guidelines will give planning authorities guidance on the criteria with which planning assessments must now comply.

Material Amendment No.61 - Clare County Council welcomes the amended text which recognises the potential of the deep water ports at Moneypoint and Cahiracon and the support of the RSES in realising their development potential is very positive.

Material Amendment No.65 - It is requested that all reference to the airport at Shannon would be referred to as “Shannon International Airport”.

Material Amendment No.74 – Clare County Council supports the inclusion of the Limerick Northern Distributor Road (LNDR), the New Interchange M18 Quin Road, Ennis, the N67/N85 Blakes Corner Ennistymon and the N85 Kilnamona Road Improvement Scheme as projects of strategic regional priority. These schemes should be included in the RSES infrastructure priority list.

Material Amendment No.75 – It is requested that the list of projects include the “Link Road from Tulla Road (R351) to Quin Road ( R469) in Ennis

Material Amendment Nos.120/121- The proposed amendment to expand and alter the Limerick-Shannon MASP boundary is noted. The proposed amendment provides the MASP boundary to include areas of County Tipperary extending northwards from the Limerick Shannon metropolitan area to include Mountpellier, Birdhill and Ballina. It should be noted also that these settlements are contiguous and immediately across the River Shannon from County Clare, which are not within the MASP. Of significance Mountpellier is a linked settlement with O’Briensbridge and Ballina is a linked Settlement with Killaloe. Thus the exclusion of these County Clare Settlements will disfavour their development into the future and does not reflect the functional, spatial and socio-economic relationships between the settlements and Limerick - Shannon.

Material Amendment No.126 – The proposed new table including population projections for the MASP area is noted. As previously conveyed to you via previous Clare submissions and informal discussions held in the process of drafting the RSES, Clare County Council has very significant concerns regarding the restricted population allocations for Co. Clare on foot of both the Roadmap document and the draft RSES proposed. The population allocation does not correspond with the level of growth that Co. Clare has experienced historically and we maintain the concern that the population allocations as now indicated in the RSES will limit development potential across the county into the future. From a practical viewpoint the information presented below is an indication of the extent of changes to the settlement profile across the county that will be required should the RESES population projections be adopted in their current format.

**Zoning calculations for the County based on the Draft RSES population allocation**

<b><u>Total residentially zoned land in CDP to 2023</u></b>	<b>661.67ha</b>
Total zoned land in CDP to 2023 MASP settlements	109.11ha
Total zoned land in CDP to 2023 excluding MASP setts.	552.56ha

**Estimated change in residential land zoning required between CDP and Draft RSES based on population allocation**

CDP population for County to 2023	143,699
RSES population for County to 2023*	129,363
Difference between RSES and CDP population above	-14,336
<b><u>Amount of land required to be de-zoned</u></b>	<b>264 ha</b>

\*Calculated on the basis of a reverse compound formula derived population allocated from Draft RSES 2026 allocation

It is worth noting that the Clare County Development Plans 2011 - 2017 and the 2017-2023 have taken a responsible, sustainable and evidenced-based Core Strategy approach to the quantum of land use zoning. We are extremely concerned that the first act required incorporating the RSES – in its proposed form - into Clare County economic and land use policy will be to require the de-zoning of over 260 ha of lands – some 40% of total zoning - in County Clare.

In seeking however to provide a solution, Clare County Council notes the statement in the NPF Roadmap that *“Scope for [further] headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline (i.e. Cork (City and County), Dublin (all four local authorities), Galway (City and County), Kildare, Limerick, Louth, Meath, Sligo, Waterford, Westmeath, and Wicklow.”*

Whilst we note that Clare County is not explicitly included in this list, it is noted on page 83 of the proposed Amendment document that Department have agreed that the 25% headroom can apply to County Clare area of the Limerick-Shannon Metropolitan Area. Consequently, we hold the view that it is reasonable (given that Clare has exhibited a higher level of growth than Limerick) to provide for the further 25% headroom in the Clare part of the Limerick-Shannon Metropolitan Area, which comprises a number of fast growing urban settlements. This is particular relevant in the context of

the focus of economic and population growth in urban centres along the Limerick- Shannon-Ennis-Galway corridor and Atlantic Economic Corridor (AEC).

In this regard Clare County Council requests that the RSES explicitly states that the additional 25% population headroom stated in the NPF Roadmap is specifically, and solely, assigned to the County Clare area of the Limerick-Shannon Metropolitan area. It is this discretionary population allocation which Co. Clare requires to ensure that there is ample opportunity to realise the ambitious growth envisaged for the County as a whole. We believe that this statement would provide the clarity required in the RSES for future Core Strategies, zoning provisions and critically would redress to an extent the restrictive allocation for County Clare in the NPF Roadmap. Moreover, the assignment of the total 25% headroom to County Clare would have no impact on the ambitious population allocation of Limerick City and County and would achieve the outcome and ambition for compact urban growth in the Metropolitan areas as envisaged by the NPF.

Having reviewed the Proposed Material Amendments to the Draft RSES Environmental Report the following points are noted.

New RPO C It is considered that the **Limerick Northern Distributor Road** should be mentioned in the new PRO C as this is a critical regional driver of growth.

New RPO H The inclusion of this new PRO H will have a significant impact along the County Clare coastline and the Shannon Estuary in particular as it seeks to *“avoid new development in areas at risk of coastal erosion to the greatest extent practicable”*. Significant work will be needed at the Development Plan making stage to implement this objective in terms of identifying vulnerable areas. Given much of this area is heavily reliant on tourism and the development of associated spin offs to this sector it could be contracted as a result of this objective in addition to housing and other developments.

Finally, Clare County Council would like to take this opportunity to thank the staff involved in putting together this Proposed Material Amendments document and all the previous RSES's documents, for their engagement and co-operation throughout the process. We look forward to continuing to work in a positive manner in the drafting of the final RSES document over the coming months.



Liam Conneally

Director of Services