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Planning Department,
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Ennis,
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V95 DXP2

11th May 2023

RE: Submission to the Draft Direction on the Clare County Development Plan 2023-2029

A Chara,

Further to the notice of a Draft Direction on the Clare County Development Plan 2023-2029 dated 28th April 2023, the Southern Regional Assembly (SRA) sets out below its observations on the Section 31 Draft Ministerial Direction.

In the SRA's response to the Proposed Material Alterations to the Draft Clare County Development Plan 2023-2029, concern was expressed that the additional land zoned for residential purposes as well as the expanded settlement boundaries set out in Volumes 3 (Municipal District Settlement Plans) would be contrary to the principle of Compact Growth.

The SRA notes that Item 2 (a) of the Draft Direction seeks to reinstate and amend the specified zoning objectives and associated text consistent with the recommendation of the Chief Executive's Report dated 10th July 2022. In support of achieving compact growth and an appropriate response to flood risk, the *Regional Spatial & Economic Strategy for the Southern Region* (RSES) Regional Policy Objectives (RPOs) 35 *Support for Compact Growth* and 116 *Planning System and Flood Risk Management* are of note for Points (I) and (III) of the Draft Direction's Statement of Reasons:

RPO 35 Compact Growth

a): Local Authorities, through Development Plan and Local Area Plan policies, shall identify rejuvenation priorities within our region's settlements which demonstrate achievement of National Strategic Outcome: Compact Growth.

b): Development Plans shall set out a transitional minimum requirement to deliver at least half (50%) of all new homes that are targeted in the region's three Cities and suburbs of Cork, Limerick and Waterford, within their existing built up footprints in accordance with NPF National Policy Objective

3b. This will be evidence based on availability and deliverability of lands within the existing built up footprints.

(c): Development Plans shall set out a transitional minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs, within their existing built-up footprints in accordance with NPF National Policy Objective 3c. This will be evidence based on availability and deliverability of lands within the existing built up footprints.

RPO 116 Planning System and Flood Risk Management

Consideration must be given to future appropriate land-use policies in accordance with the requirements of the Guidelines, “The Planning System and Flood Risk Management 2009”. Strategic and local flood risk assessments and plans should be prepared where appropriate, which should include consideration of potential impacts of flood risk arising from climate change. It is an objective to avoid inappropriate development in areas at risk of flooding and integrate sustainable water management solutions (such as SUDS, non-porous surfacing and green roofs) to create safe places in accordance with the Guidelines.

Item 2 (b) of the Draft Direction seeks to delete subsection ‘Existing Accesses onto National Secondary Roads’ under ‘Exceptional Circumstances’ of section 11.2.9.3 of the Plan consistent with the recommendation of the Chief Executive’s Report dated 10th July 2022. RSES RPO 140 *International Connectivity* is of note for Point (II) of the Draft Direction’s Statement of Reasons:

RPO 140 International Connectivity

It is an objective to:

a. Sustainably maintain, support and enhance the Region’s International Connectivity Transport Network including the Trans European Transport Network (TEN-T) which seeks the development of a Europe wide network of railway lines, roads, inland waterways, maritime shipping routes, ports, airports and railroad terminals.

b. Sustainably maintain the strategic capacity and safety of the national roads and rail network including planning for future capacity enhancements to ensure effective land transport connections to the major ports, airports and markets.

c. Support the role of our strategic road and sustainable transport networks including connectivity to the TEN-T Core and Comprehensive Network, connecting the Region’s metropolitan areas, key towns, ports and airports with the Atlantic Economic Corridor, extended Dublin-Belfast Eastern Corridor and other urban networks as identified through Section 3.8 of the RSES and City and County Development Plans.

d. Sustainably support infrastructure for electric and low carbon fuel infrastructure along TEN-T Core and Comprehensive Network.

These objectives of the RSES should be taken into consideration in the Direction and Statement of Reasons

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David Kelly
Director Southern Regional Assembly