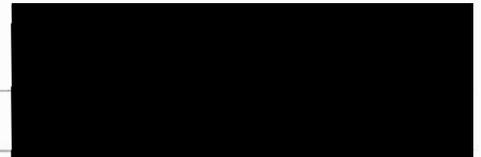


Submission ref: S2-118



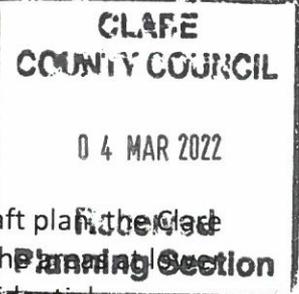
1-3-2022

RE. COUNTY DRAFT
DEVELOPMENT PLAN

DEAR SIR/MADAM,

PLEASE KIND ENCLOSED,
SUBMISSION IN REGARD TO THE
LAND AT BALLYBEG ENNIS, ZONED
LOW DENSITY IN PRESENT DEVELOPMENT
PLAN TOGETHER WITH MAP SHOWN SAME.

YOURS SINCERELY
Colm Keating



Dear Sir/ Madam,

I would suggest that rather than being rezoned agricultural as per the draft plan in the Clare County Development Plan 2023-2029 would be better served in leaving the Ballybeg (outlined in black, and green on the attached map) zoned as residential development, as per the Clare County Development Plan 2017-2023, for the reasons set out below.

Section 1.14.1 *Strategic Aims for Infrastructure in volume-3a-ennis-municipal-district-settlement-plans-45165.pdf*, lists one of the strategic aims which the Council will proactively pursue as "Water and wastewater infrastructure for planned growth".

The Core Strategy of this draft County Development Plan, according to section 1.14.3 *Water and Wastewater Infrastructure*, seeks to "grow Ennis in line with its Key Town designation in the National Planning Framework and its local and regional importance". With a rise in population of greater than 30% above 2016 population levels expected by 2040, "the expansion and maintenance of this service infrastructure is critical in order for Ennis to fulfil its role as key town and provide for projected growth in population".

In *volume-8-clare-housing-strategy-45174.pdf*, it states that "KPMG Future Analytics have calculated a total Housing Supply Target of 4,500 households for the Clare County Development Plan 2023-2029..." which "...will be pursued by Clare County Development Plan 2023-2029 in its Core Strategy and related land use zoning".

Irish Water have committed in writing to carrying out all necessary upgrades to the treatment plant at lower Ballybeg to accommodate a connection to the existing sewerage network, subject to

- planning permission being obtained for a wastewater solution at this location;
- all existing properties being accommodated by the wastewater solution.

An emphasis has been placed, by both the Council and other Agencies at a national level, on the potential environmental detriment to Killone lake posed by all development (existing and proposed) where suitable wastewater services are not in place. Regarding the current wastewater treatment solutions in place at the existing housing cluster,

- many septic tanks pre-date the 1970's;
- the most modern septic tank solution in use was installed circa 2004, and is based on standards acceptable at the time.

Other aims and objectives of the draft County Development Plan include Water Infrastructure and Environmental Protection. In this context, it is worth considering that Killone lake is used as a source of drinking water for a population outside of the Ennis town environs, including the Barntick area.

The area which is proposed to be rezoned agricultural also includes multiple <0.5 acre sites (highlighted in green on the attached map), located in the middle of the existing housing

cluster. It makes no sense to designate properties in the middle of a housing cluster as agricultural, especially given the total unsuitability of those sites for agricultural purposes.

The development of a wastewater solution in the area will require collaboration between the various existing majority landowners and a property developer, forming part of a wider application to develop a low-density housing scheme in the surrounding area to make investment worthwhile. Based on the draft County Development Plan 2023-2029, such a development would enable the Council to meet many of its stated aims and objectives at the same time, so rezoning the area as agricultural would not be constructive.

In summary, the development of a wastewater solution which solves an existing and ongoing environmental problem, lends itself to the development of additional much needed housing in the area, while contributing to the stated aims and objectives of the draft Clare County Development Plan 2023-2029 should be actively encouraged by the Council, rather than discouraged.

I believe that it would be counter-productive for the Council to obstruct (through this proposed rezoning), rather than facilitate, at least three stated aims and objectives in relation to Water and Wastewater infrastructure, Housing Supply Target, and Environmental Protection, in its own draft County Development Plan.

Your sincerely,

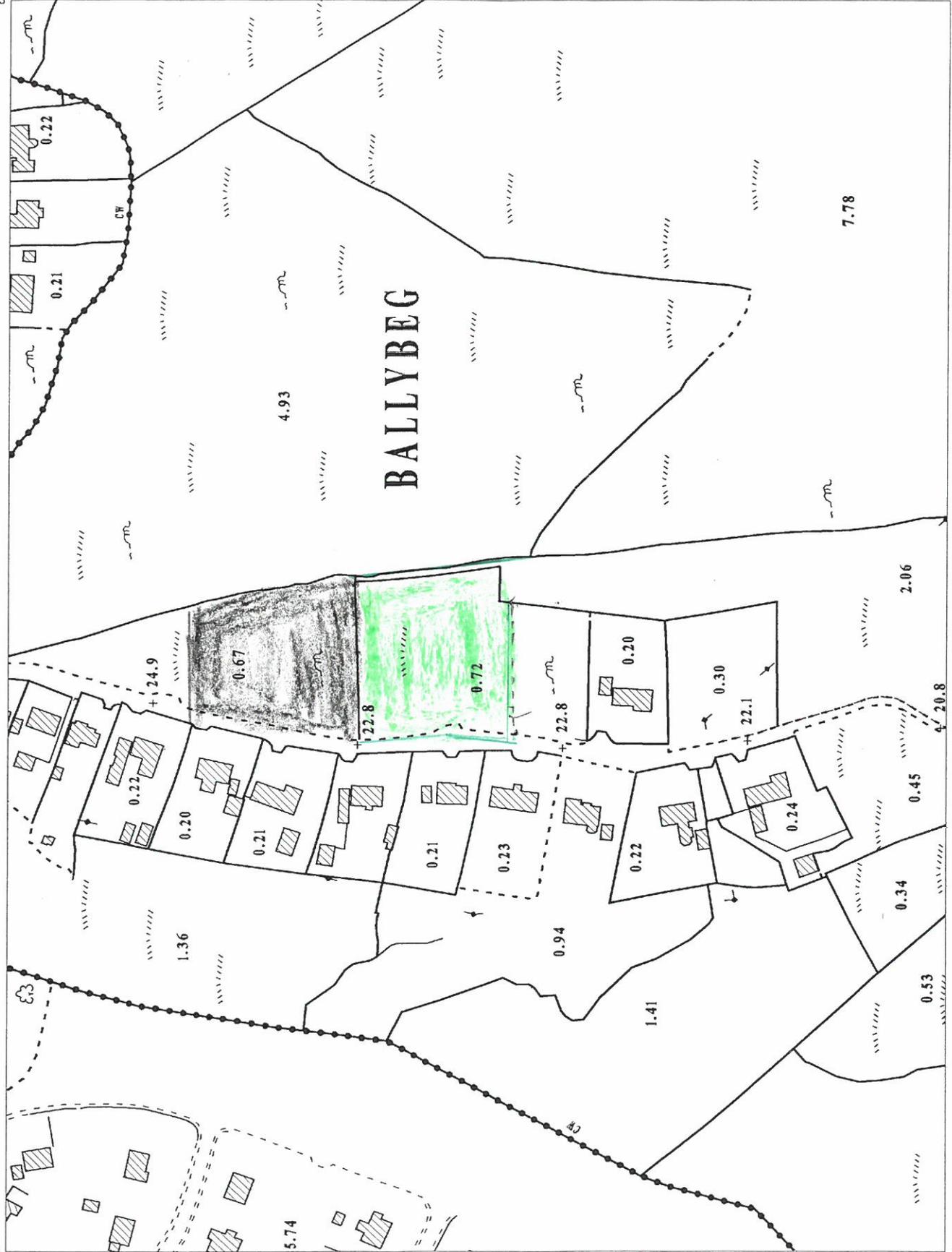
A handwritten signature in black ink that reads "Colin Keating". The signature is written in a cursive style with a large, looping 'C' at the beginning and a long, sweeping tail at the end.

Surveyed 2001
Revised 2001
Levelled 0

Rural PLACE Map



133523
174947



DESCRIPTION

MAP SCALES

1:2500
4380-A



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174522
133523

Plot Ref. No. 19644_1_3
Plot Date 08-OCT-2004



Scale:— 1:2500
Scála:— 1:2500

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