

Town & Country

RESOURCES LIMITED

PLANNING AND DEVELOPMENT CONSULTANTS

Our Ref : 21134

24th March 2022

Senior Administrative Officer,
Planning Department,
Clare County Council,
New Road,
Ennis,
County Clare,
V95 DXP2.

**Re: Draft Clare County Development Plan 2023-2029
Draft Stage Submission re Lands at Beechpark, Ennis, County Clare**

Dear Sir/Madam,

Town & Country Resources Limited, Planning & Development Consultants, Hawthorn, Breskamore, Clarina, Limerick are instructed by Thomas and Assumpta Murray, [REDACTED], to make this submission in response to the Draft Clare County Development Plan 2023-2029, published by Clare County Council on 10th December 2021.

We trust that the points raised in the submission will be taken into account by Clare County Council in its review of the Draft Clare County Development Plan 2023-2029, and we look forward to further consultation with the Planning Authority in relation to this matter, in due course.

Yours sincerely,



Dianne McDonogh
Town & Country Resources Limited
Planning & Development Consultants
Encl./....

Town Planning Submission

Draft Clare County Development Plan 2023-2029

Draft Stage Submission on behalf of Thomas and Assumpta Murray

Lands at Beechpark, Ennis, County Clare

March 2022

Prepared by

Town & Country
RESOURCES LIMITED

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1.0 Introduction

Town & Country Resources Limited, Planning & Development Consultants, are instructed by Thomas and Assumpta Murray, [REDACTED], to make this submission in response to the Draft Clare County Development Plan 2023-2029, published by Clare County Council on 10th December 2021.

In summary, this submission requests the following :

- i. **That Clare County Council amend the Draft Ennis Settlement Plan to extend the Ennis Plan Boundary westwards at Beechpark, Ennis, see Figure 5.**
- ii. **That Clare County Council allocate the *Agriculture* Land Use Zoning Objective to lands at Beechpark, Ennis within the new extended Plan Boundary area, see Figure 5.**
- iii. **That Clare County Council allocate the *Enterprise* Land Use Zoning Objective to 7.9 hectares of land at Beechpark, Ennis, see Figure 5 and Figure 6.**

2.0 The Subject Lands

Thomas and Assumpta Murray own greenfield lands comprising 15.55 hectares to the west of Ennis, located to the west of the roundabout junction of the N85 with the R474 Ennis to Kilmaley Road, and to the south of the R474, see Figure 1-3 below. The lands are in agricultural use; there is a derelict house with ancillary farm buildings on the lands fronting immediately onto the R474. 4 detached houses fronting onto the R474 adjoin the north-western corner of the lands. There are lands in third party ownership adjoining the subject lands.

There are no Natura 2000 sites on or immediately adjacent to the subject lands and the lands do not overlap with the boundaries of any Natural Heritage Area. No part of the land is located within or close to an identified zone of archaeological potential or architectural interest. The subject lands do not include any protected structures and are not situated within an Architectural Conservation Area. The subject lands do not contain and are not bounded by any protected trees.

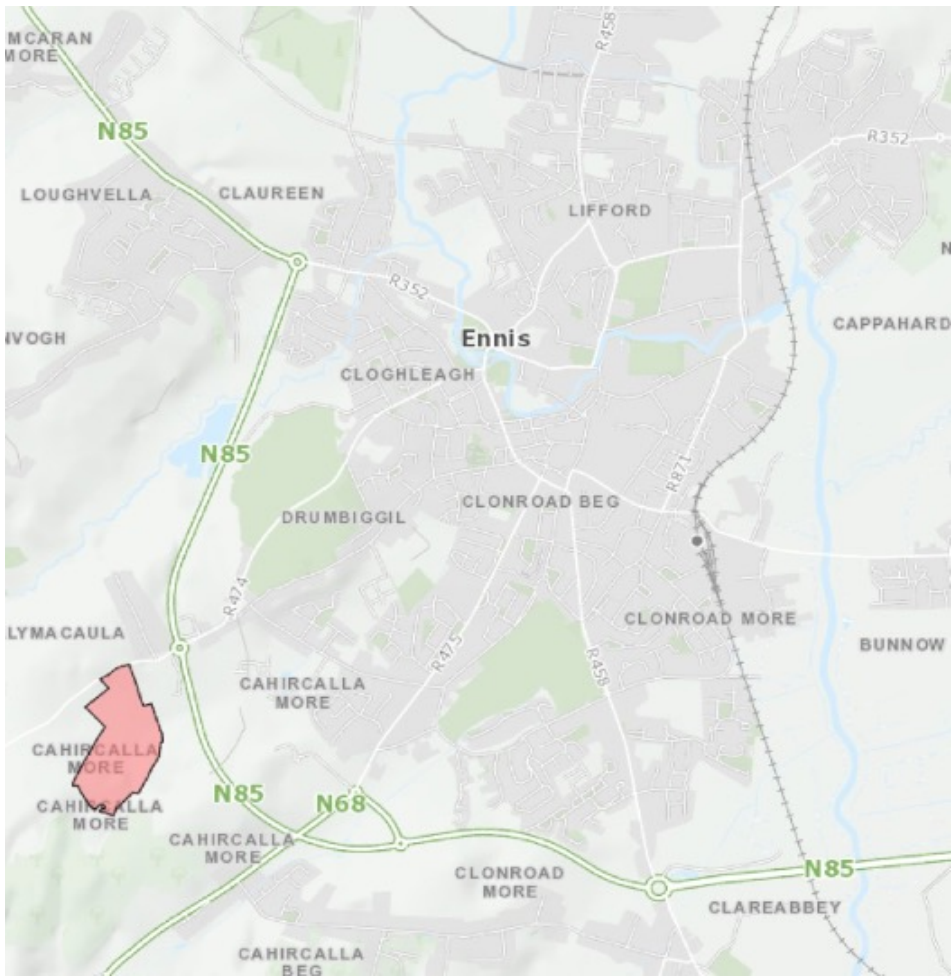


Figure 01 Location of Subject Lands Source: OSI with TCR Overlay (Approximate).

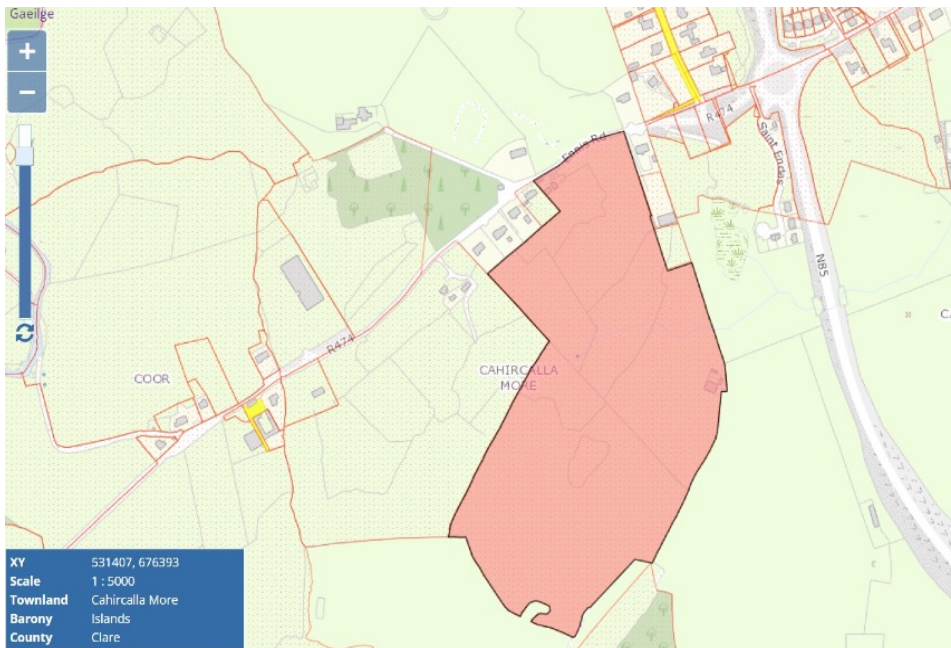


Figure 02 Subject Lands outlined in Red. Source: OSI with TCR Overlay (Approximate).



Figure 03 Subject Lands outlined in Red. Source: Google Maps with TCR Overlay (Approximate)

3.0 Draft Clare County Development Plan 2023-2029

3.1 Draft Ennis Settlement Plan

The written statement and maps for Ennis are contained in Volume 3(a) of the Draft Development Plan 2023-2029. The Municipal District of Ennis with a population of 30,910, encompasses the 'Key Town' of Ennis, Clarecastle, and the surrounding villages of Barefield, Kilnamona and Toonagh and a network of clusters and countryside areas. Ennis, as the County Town is the administrative and service centre of the County. It is also the significant employment and primary residential centre in the County.

The town and its environs is located in an identified *Working Landscape* and is centrally located on the main economic growth corridor in the Mid-West Region forming part of the Atlantic Economic Corridor.

Ennis is designated as a 'Key Town' in the '*Regional Spatial and Economic Strategy for the Southern Region*' (RSES). The RSES identifies Ennis for significant population growth of greater than 30% above 2016 population levels by 2040. The Draft Plan written statement states :

Ennis has an important role to play, both locally and within the wider region as a self-sustaining, regional economic driver and as a key location for investment choice in the region. Its enhanced development will build on its strategic location relative to Limerick and Galway Cities and Shannon International Airport as well as its role as a centre of employment and economic activity within the region. Ennis will continue to build on its service provision and amenities for the surrounding network of rural villages.

3.2 The Subject Lands in the Context of the Draft Ennis Settlement Plan

The subject lands are outside (to the west) of both the 'Settlement Boundary' and the 'Plan Boundary' for Ennis as set out Draft Plan. Thus, the lands are currently designated 'Countryside', by reference to the County Settlement Hierarchy as set out in Table 3.1, Volume 1 the Draft Plan, see Figure 4.

In addition, section 14.3.3.2 of Volume 1 confirms that the lands are situated within the 'Western Corridor Working Landscape'.

Relevant to this designation, *Draft Development Plan Objective CDP14.3* states:

It is an objective of the Development Plan:

- a) To permit development in these areas that will sustain economic activity, and enhance social well-being and quality of life - subject to conformity with all other relevant provisions of the Plan and the availability and protection of resources;*
- b) That selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design, are directed towards minimising visual impact;*
- c) That particular regard should be given to avoiding intrusions on scenic routes and on ridges or shorelines.*

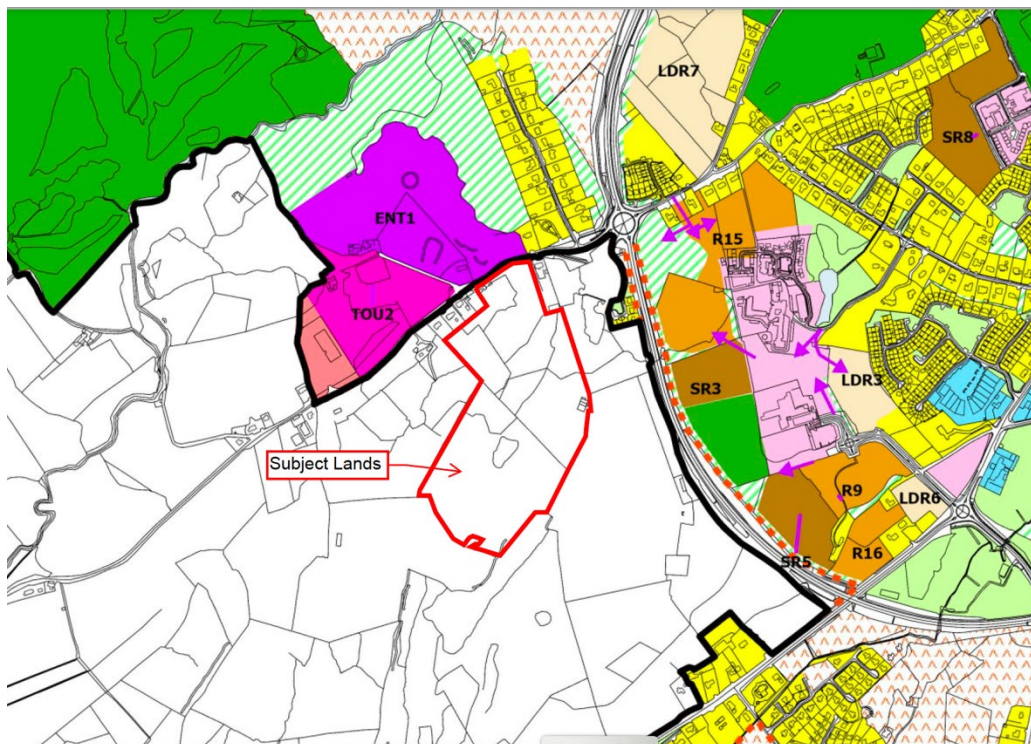


Figure 04 Subject Lands outlined in Red in Context of Ennis Settlement Plan Zoning Map.
Source: Clare County Council with TCR Overlay (Approximate)

There are other lands zoned for 'Enterprise' development purposes (ENT1 ref. Draft Plan Volume 3a Section 2.13.1) and 'Tourism' development purposes (TOU2 ref. Draft Plan Volume 3a Section 2.13.1) to the north of the R474, opposite the subject lands, see Figure 4.

These lands are identified by the Planning Authority as suitable for development of an Enterprise Park and a Tourism Activity Park, respectively and are described at section 2.13.1 of the Draft Plan as :

***‘strategically located lands to east of the junction of the N85 with the R474’; and
‘readily accessible from the N85’.***

These lands are also zoned ENT1 and TOU2 in the current Ennis Settlement Plan 2017, however there is no planning history in respect of these lands, and no record of any development proposal coming forward for these lands for any development purpose since the 2017 Plan was adopted.

In the vicinity of the subject lands to the east, both the ‘Settlement Boundary’ and the ‘Plan Boundary’ run along the N85. The boundaries encompass the Beechpark Halting Site, and at the Beechpark Roundabout, the boundary extends west along the R474 for c800m to encompass the aforementioned lands to the north of R474, namely lands zoned *Existing Residential*, the *Enterprise* (lands ENT1), *Tourism* (lands TOU2) and the Clare County Council Machinery Yard, zoned *Light Industry*.

Our client wishes to put forward additional lands for consideration by the Planning Authority for employment generating land use on the basis that the lands are of equal strategic importance, when compared with the adjacent ENT1 and TOU2 lands to the north of the R474 Ennis to Kilmaley Road.

4.0 Draft County Development Plan Amendment No. 1 and No. 2

The Planning Authority is requested to amend the Draft Ennis Settlement Plan to (i) extend the Ennis Plan Boundary westwards at Beechpark, and (ii) allocate the *Agriculture* Land Use Zoning Objective to lands at Beechpark, as shown on Figure 5 below.

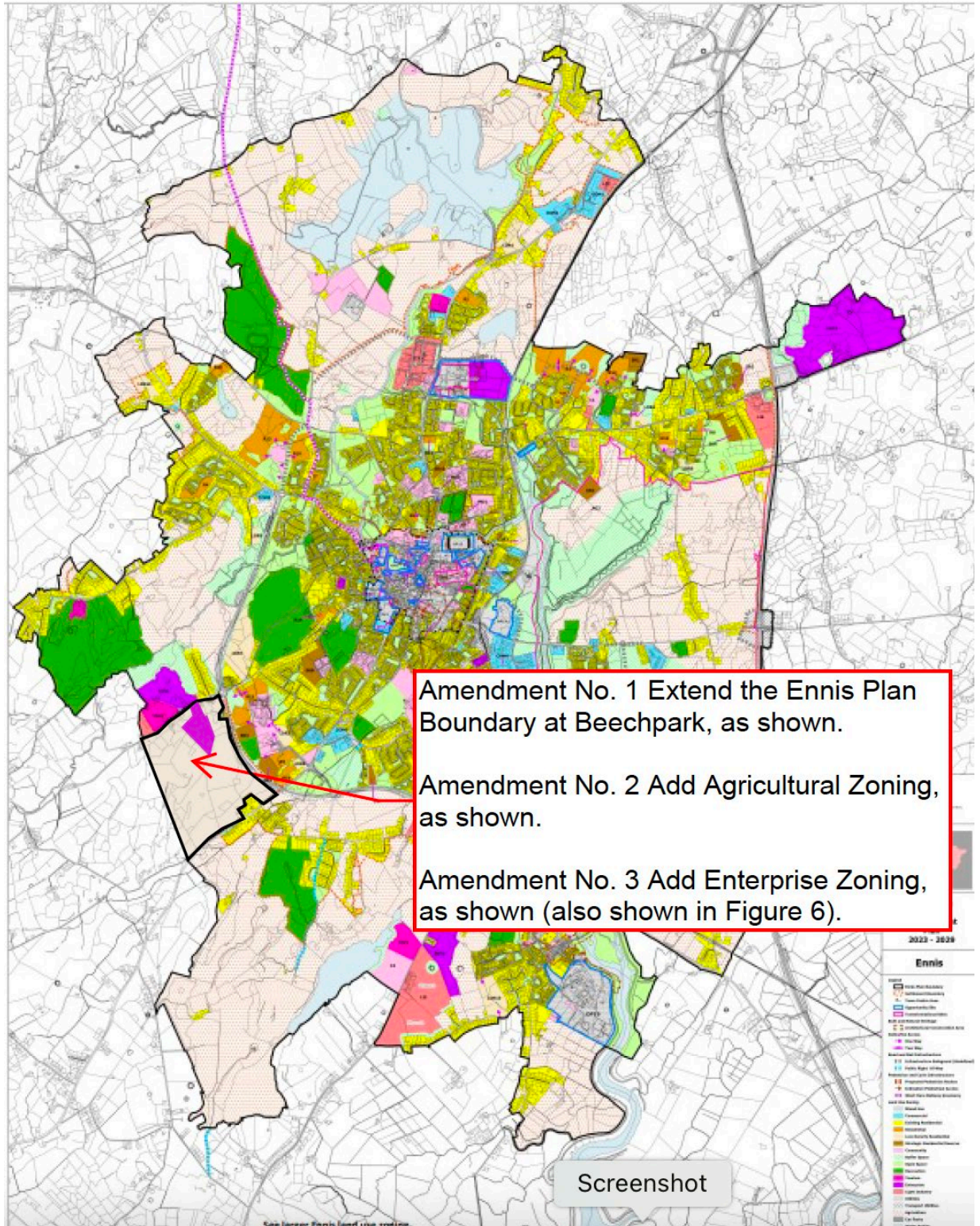


Figure 05 Proposed Amendment No. 1, Amendment No. 2 & Amendment No. 3.
Source: Clare County Council with TCR Overlay (Approximate)

The lands at Beechpark, Ennis surrounding the subject lands to the west of the N85 and south of the R474 road are exclusively in agricultural use. Thus, we request the Planning Authority to amend the Plan Boundary to the west of the town to encompass these lands, and to allocate an *Agriculture* zoning to the lands, as shown on Figure 5.

This change in the Draft Ennis Settlement Plan Boundary would represent a positive change by acknowledging the relevance of including these strategically located lands at the edge of the urban area within the Settlement Plan area, and furthermore by reflecting the subsisting land use status of the lands in a relevant zoning categorisation, *Agriculture*.

Currently, this landbank is designated '*Countryside*', despite its strategic location to the immediate west of the town and with immediate access to good quality road infrastructure. The Planning Authority itself has stated that the Beechpark area of the town is a 'strategic location', in its referencing to the ENT1 and TOU2 landbanks to the north of the R474 road, immediately adjacent to the subject lands, ref. Draft Plan section 2.13.1.

We believe that this landbank adjoining the urban area and adjoining a key road corridor to the west of the town should benefit from the full range of strategic goals, policies and objectives set out in the Ennis Settlement Plan, as opposed to the rural area policies and objectives as detailed in the County Development Plan. Thus, we request the Planning Authority to formally amend the Draft Plan by changing the designation of the lands from *Countryside* status as per the County Development Plan to the *Agriculture* land use zoning as provided for in the Ennis Settlement Plan.

5.0 Draft County Development Plan Amendment No. 3

The Planning Authority is requested (iii) to amend the Draft Ennis Settlement Plan at Beechpark to allocate the 'Enterprise' land use zoning objective to 7.9 hectares of land, as shown on Figure 6.

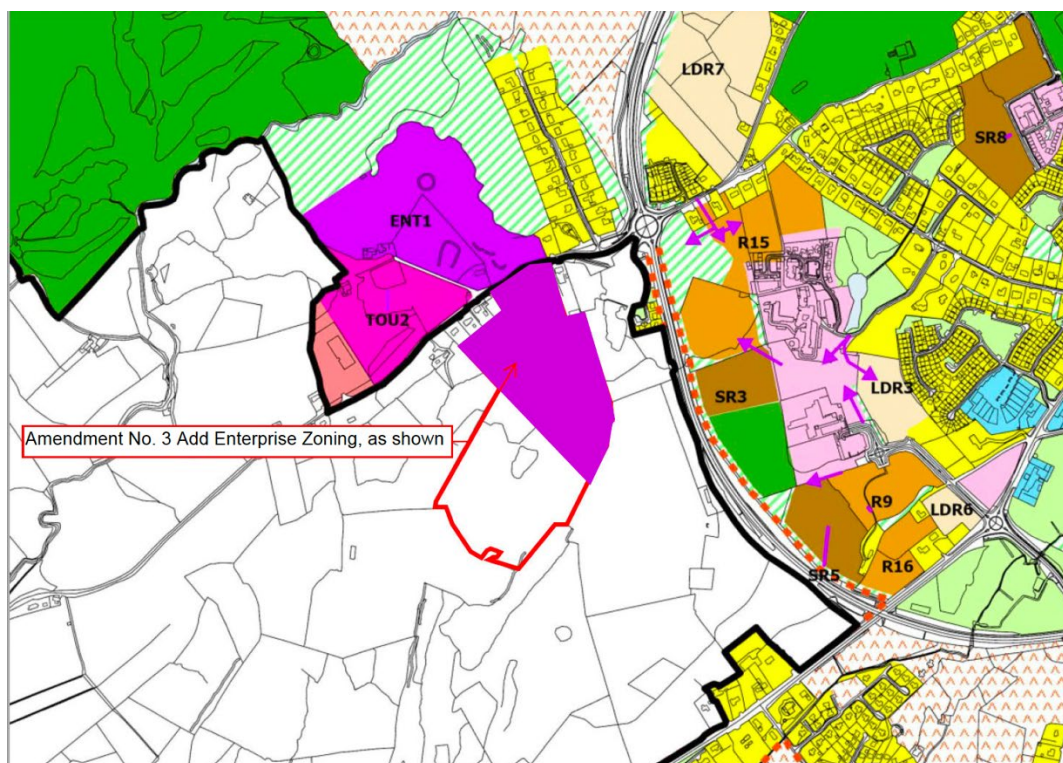


Figure 06 Proposed Amendment No. 3 Source: Clare County Council with TCR Overlay (Approximate)

Our analysis finds that the objective for a new *Enterprise* land use zoning at the subject site complies with national and regional strategic planning policy objectives confirmed in recent years, primarily as the lands are strategically situated and can comprise new employment generating land adjacent to the existing built-up footprint of the urban area of Ennis.

Section 19.4 of the Draft Plan defines the Enterprise land use zoning, as follows :

'Enterprise

Lands zoned for 'enterprise' shall be taken to include the use and development of land for high end research and development, business science and technology-based industry, financial services, call centres/telemarketing, software development, data centres, enterprise and incubator units, small/medium manufacturing or corporate office in high quality campus/park type development. It is intended that such developments will have high quality architectural design and landscaping. This zoning allows for 'walk to' support facilities such as canteen, restaurant or crèche services which are integrated into employment units and are of a nature and scale to serve the needs of employees on the campus. This zoning also allows for associated power generating infrastructure as well as transportation infrastructure such as car and bicycle parking and bus stop shelters. This zoning excludes general retail, retail park outlets, motor sales/servicing activities and heavy industrial undertakings'.

It is an objective of Clare County Council to ensure that an adequate supply of land is zoned in Ennis and its environs to facilitate the creation of new sustainable employment and enterprise developments and stimulate inward investment. Ennis is designated as a 'Key Town' in the 'Regional Spatial and Economic Strategy for the Southern Region' (RSES). The RSES identifies Ennis for significant population growth of greater than 30% above 2016 population levels by 2040.

The *Ennis 2040 Economic and Spatial Strategy* provides a long-term strategy for the sustainable development of the Key Town and sets out the measures required to manage economic, infrastructural, environmental and physical challenges, including transportation, demographic and population change, retail vitality and viability, availability of modern office and employment accommodation and environmental considerations.

The *Ennis 2040 Strategy* envisages that the population of Ennis will grow from 25,276 to 37,000 by 2040 (1.6% per annum). According to the Strategy, Ennis currently caters for 10,000 jobs and will need to provide for/accommodate 5,000 additional jobs over the period to 2040 to achieve sustainable population growth. For the purposes of the strategic analysis, Ennis is divided into 'inner', 'intermediate' and 'outer' opportunity areas. Figure 7 below taken from the Strategy generally outlines those areas; the approximate location of the subject lands is identified by the red dot.



Map 2 Opportunity Areas

Figure 07 Opportunity Areas – Inner, Intermediate and Outer Opportunity Areas

(Source: Ennis 2040 An Economic and Spatial Strategy, Map 2)

According to the Strategy it is anticipated that: the inner opportunity sites will provide at a minimum 20,000sq.m of commercial floorspace and accommodate 1,500 – 1,800 jobs; the intermediate sites will provide at a minimum 30,000 sq.m of commercial floorspace supporting 2,000 – 3,000 jobs; and the outer sites will provide a minimum of 20,000 sq.m of commercial floorspace in a less intensive campus style layout.

Whilst the Draft County Development Plan provides no statement or estimate of the quantum of undeveloped employment zoned land in Ennis, and no indication that an analysis of the employment generating possibilities of undeveloped employment zoned land as provided for in the Draft Plan has been undertaken, a reference to the new Dun Laoghaire Rathown Development Plan 2022-2028 indicates that an estimate of 20sq.m. of commercial floorspace per employee is a reasonable assumption in assessing the need for employment land in the context of a land use zoning review.

Taking this estimate into account, it is evident that the quantum of future commercial floorspace identified for the 'opportunity areas' in the Ennis 2040 Strategy (70,000sq.m.) would provide for 3,500 new jobs approx., a figure that is well short of the 5,000 additional jobs in the period up to 2040 as outlined in the Strategy.

As such, it is our clients' position that additional employment zoned land is required to meet projected demand taking account of targeted and projected population growth over the plan period, by reference to the requirements of the NPF and the RSES. Thus, our client requests that their land shaded purple on Figure 6 is re-zoned to zoning objective '*Enterprise*' use.

In support of this proposal, we submit that there are no special designations or environmental sensitivities pertaining to the subject lands.

In terms of accessibility, the subject lands adjoin the existing built-up area of Ennis and at approximately 2km from the town centre, the lands are within 30 minutes walking distance and under 10 minutes cycling to the social and commercial infrastructure and services of Ennis town.

In line with planning policy, the provision of *Enterprise* zoning at the subject lands constitutes the orderly and efficient extension of the urban area and is preferable to disorderly haphazard development of rural land to meet commercial development requirements.

An *Enterprise* zoning at the subject lands would ensure that sufficient land continues to be available for employment generating land use of all possibilities.

6.0 Summary

To conclude, Clare County Council is requested to have regard to the content of this submission in its preparation of the new Clare County Development Plan 2023-2029. Our client is seeking consideration of the following amendments to the Draft County Development Plan as follows :

- i. **That Clare County Council amend the Draft Ennis Settlement Plan to extend the Ennis Plan Boundary westwards at Beechpark, Ennis, see Figure 5.**
- ii. **That Clare County Council allocate the *Agriculture* Land Use Zoning Objective to lands at Beechpark, Ennis within the new extended Plan Boundary area, see Figure 5.**
- iii. **That Clare County Council allocate the *Enterprise* Land Use Zoning Objective to 7.9 hectares of land at Beechpark, Ennis, see Figure 5 and Figure 6.**

We trust that the points raised in the submission will be taken into account by Clare County Council in preparing the new Local Area Plan, and we look forward to further consultation with the Planning Authority in relation to this matter, in due course.