



Clare County
Development Plan
2023-2029

Draft Clare CDP 2023-2029 - Public Consultation Portal

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Volume 1

Core Strategy, Settlement Strategy and Housing

Volume 3(a) Ennis Municipal District Written Statements and Settlement Maps

Ennis/Clarecastle

Volume 3(b) Shannon Municipal District Written Statements and Settlement Maps

Volume 3(c) Killaloe Municipal District Written Statements and Settlement Maps

Volume 3(d) West Clare Municipal District Written Statements and Settlement Maps

Associated Documents

Volume 8 Clare Housing Strategy

Environmental Reports

None of the above

Your Submission

See attached.

Location Map



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2-1221 ClareAbbey CDP Submission - FINAL.pdf, 3.31MB



Submission to Draft Clare County
Development Plan 2023-2029
In Respect of Lands at Clareabbey, Clarecastle,
Ennis, Co. Clare

On behalf of Marram Properties Ltd

KPMG-FA
March 2022



Submission to Draft Clare County Development Plan 2023-2029
On behalf of Marram Properties Ltd

Document review and approval

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Executive Summary

This submission to the *Draft Clare County Development Plan 2023-2029* has been prepared by KPMG Future Analytics on behalf of Marram Properties Ltd in respect of lands at Clareabbey, Clarecastle, Ennis, Co. Clare.

Under the current *Clare County Development Plan 2017-2023* the lands are predominantly zoned as 'Agriculture', with pockets of land to the north zoned as 'Utilities' and 'Open Space'. The *Draft Clare County Development Plan 2023-2029* proposes to maintain the existing zoning for the subject site. The purpose of this submission is to **propose that the lands be rezoned as 'Residential'**.

The review of the demographic profile has demonstrated that there is a current need for housing as a direct response to population growth that has occurred over the last decade. The demand for housing is likely to be compounded by a projected increase in population over the course of the development plan period, and beyond.

The settlement of Ennis is well served by social infrastructure, with 175 facilities identified within the settlement and a total of 34 no. facilities identified within 2 km of the subject site. New residential development would be supported by a wealth of community infrastructure that already serves the settlement and the immediate environs.

An increase in the delivery of housing in Ennis is directly supported by national, regional and local planning policy. It is respectfully submitted that in order to deliver upon these objectives and to ensure that an adequate supply of housing is provided to meet demand, the subject lands, which are development ready, should not be precluded from providing much needed housing for the area.

From a sequential development perspective, the subject site is better positioned than many of the proposed residential zoned lands to come forward in the short to medium term due its contained and coherent landholding within single party ownership. The strategic location of the lands and the direct cycle linkages to the settlement centre supports the implementation of the '10 minute town concept' through the delivery of housing at such locations.

Furthermore, this assessment has demonstrated that a significant amount land that has been identified for residential development has been inactive for quite some time and shown no visible signs of development since the commencement of the current plan in 2017. The failure to address this issue and ensure that development ready lands such as the subject site will impede upon the Authority achieving its housing targets for the area and ultimately put Ennis' status as a Key Town and driver of regional growth at risk.

It is considered that delivery of housing on the subject site would contribute to achieving the housing targets for the area to cater for projected growth in population and would align with the following policy objectives:

- The NPF Implementation Road Map (2018) provides that Clare is projected to experience a population uplift of 10,500-12,500 persons between 2016-2026 and an

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uplift of 15,000-18,000 persons between 2016-2031. **As Clare's Key Town, Ennis will play a pivotal role in meeting this target.**

- As outlined in Housing for All, there is national target of building an average of **33,000 new homes every year from 2021 to 2030**. Housing for All seeks to support homeownership and increase new housing supply.
- At a regional level, the RSES suggest that the southern region is likely to grow by 380,000 by 2040. Key Towns such as Ennis play a critical role in ensuring the consolidated spread of growth beyond cities. **Key Towns are intended to be a focus for significant growth (more than 30%).**
- Ennis 2040 sets out the following estimates of capacity for Ennis: Inner area could deliver 45-50 units/ha, which would equate to an additional 1,350-1500 homes in the town centre by 2040; Intermediate area could deliver 30 units/ha, which would equate to an additional 3,500-4000 units by 2040; **and the Outer area (where the subject site is located) could deliver at least 15 units/ha, which would equate to an additional 700-800 units by 2040.**
- Delivery of much needed housing at this location would contribute to compact growth by providing housing in the existing built-up footprint of Ennis

On this basis, it is respectfully requested that the zoning designation of the lands be changes from 'Agriculture', 'Utilities' and 'Open Space' to 'Residential'.

1 Introduction

KPMG Future Analytics (KPMG FA) have been instructed by Marram Properties Ltd to make this submission to Clare County Council (CCC) in respect of the *Draft Clare County Development Plan 2023-2029* (Draft Plan) and the zoning of approximately 7.15 ha, located on lands at Clareabbey, Clarecastle, Co. Clare, as identified in Figure 1.1.



Figure 1.1: Aerial Imagery showing location of subject lands (outlined in red)

As indicated in Figure 1.1 above, the subject site is located to the south of the Ennis settlement centre and south of the N85 and west of Clare Road offering excellent connectivity opportunities. The lands are advantageously positioned in terms of their strategic location and proximity to Ennis town centre. The site further benefits from its contained and coherent landholding owned by a single-party and adjoins an established residential setting further highlighting the opportunity to tie with an existing residential community.

It is worth noting that while the subject site is greenfield in nature, the surrounding area comprises existing residential development, particularly to the west of the subject site. The subject lands present an opportunity to physically connect to an established residential community and represents a logical and coherent response to underutilised lands. The provision of residential development at this location would add to the existing cluster of compatible uses in this area.

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The following submission will demonstrate why the subject site should be included on the list of 'Residential' zoned sites. Furthermore, this submission will demonstrate why the subject site is more suitable than some of the sites currently zoned for residential development.

The following submission will demonstrate why the subject site should be included on the list of 'Residential' zoned sites. Furthermore, this submission will demonstrate why the subject site is more suitable than some of the sites currently zoned for residential development and should therefore be prioritised for residential development.

1.1 Current Zoning and Zoning Sought

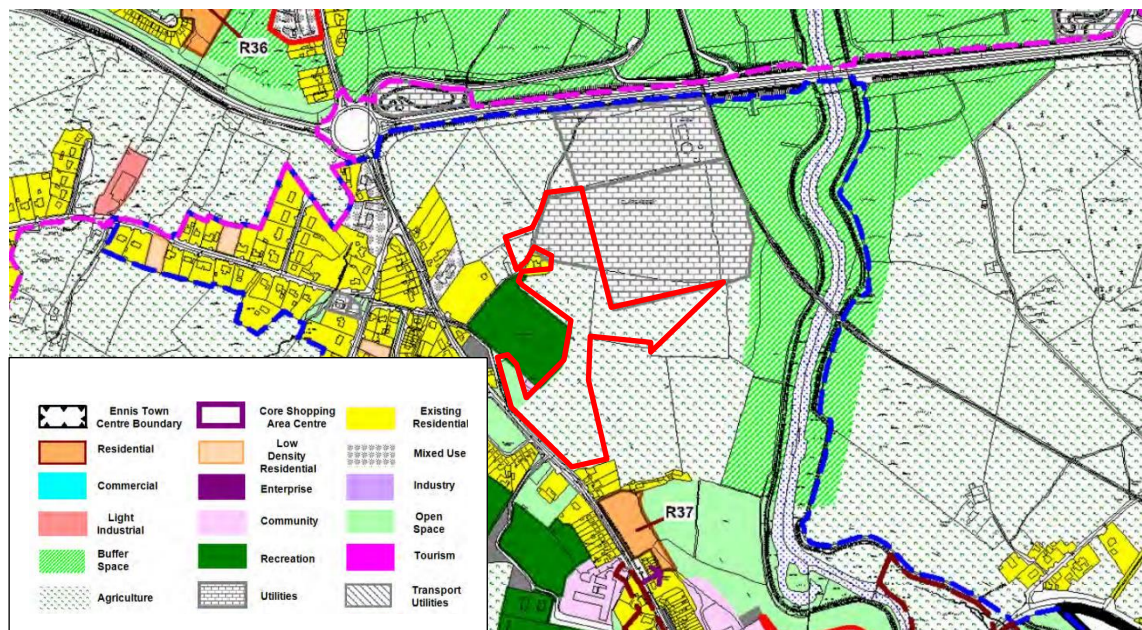
LAND USE ZONING SOUGHT

From: 'Agriculture', 'Utilities' and 'Open Space'

To: 'Residential'

The subject site is presently zoned as 'Agriculture', with some smaller areas of land to the north of the site zoned as 'Utilities' and 'Open Space' in the current *Clare County Development Plan 2017-2023* (Figure 1.2).

The *Draft Clare County Development Plan 2023-2029* proposes to maintain the existing zoning for the subject site (Figure 1.3). This submission respectfully seeks the lands to be rezoned as 'Residential', as per Figure 1.4.





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Figure 1.2 Current Zoning in the Clare County Development Plan 2017-2023

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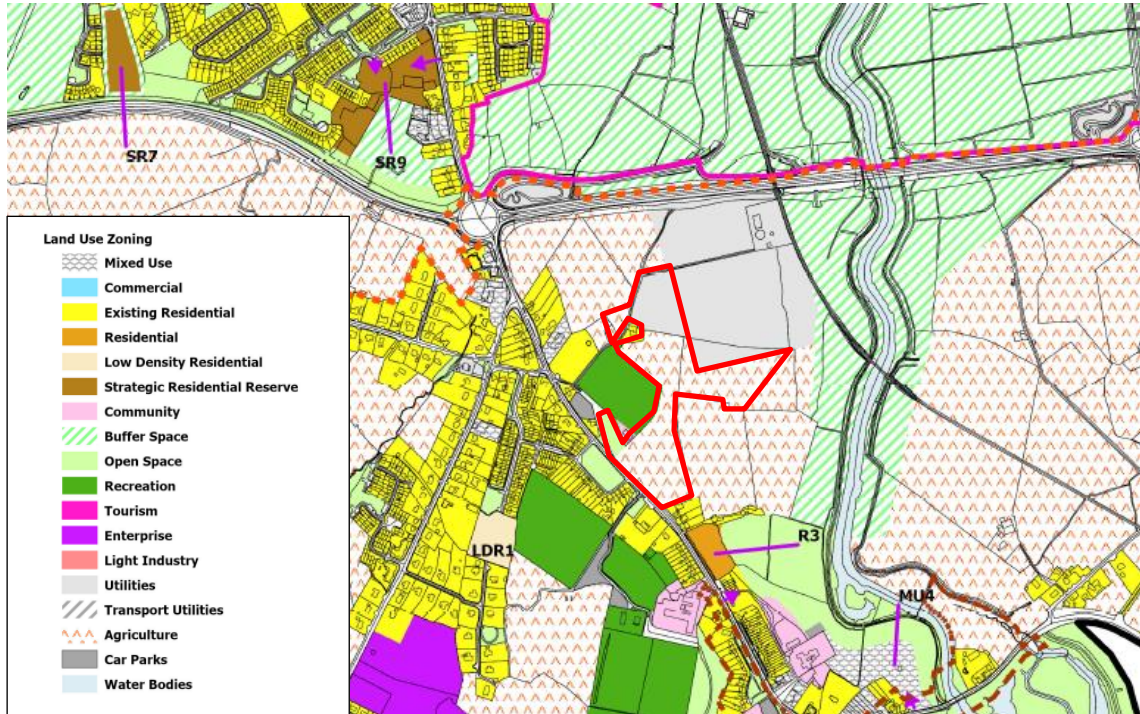


Figure 1.3 Zoning proposed by the Draft Clare County Development Plan 2023-2029

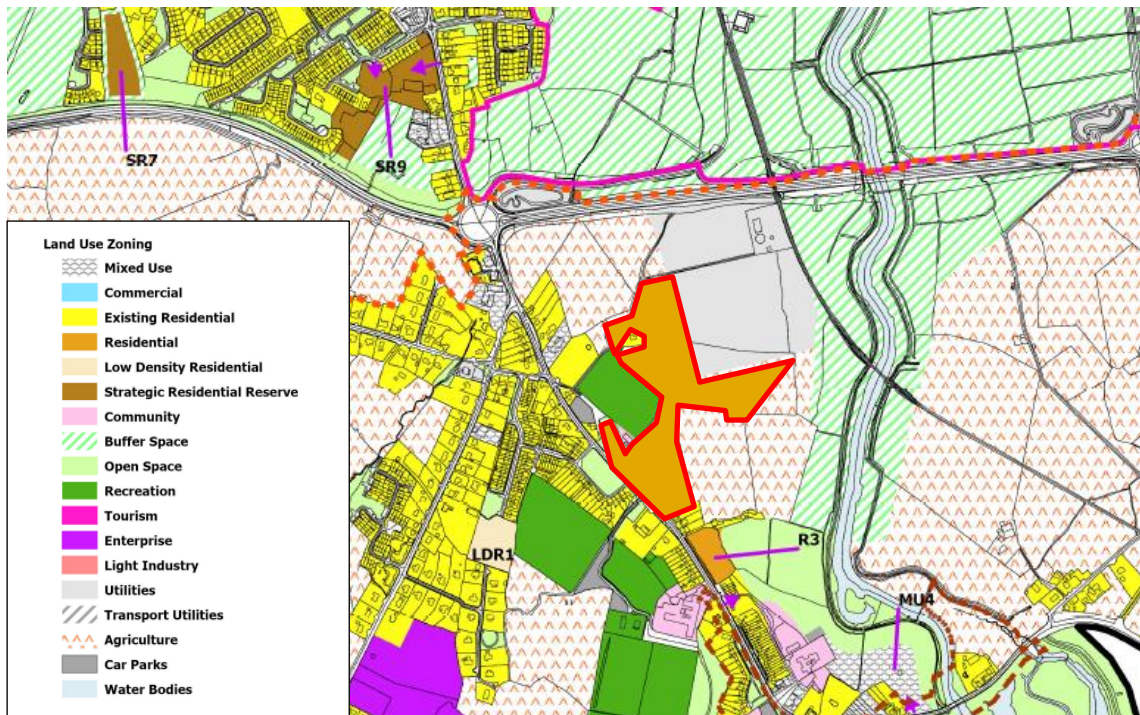


Figure 1.4 Zoning change proposed by this submission to the Draft Clare County Development Plan 2023-2029

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It is acknowledged that part of the subject site and the lands to the north are zoned as 'Utilities' which are intended for the following:

“land zoned ‘utilities’ and ‘infrastructure safeguard’ will be reserved for the existing and future provision of key infrastructural services and the upgrading of existing services and infrastructure relating to road, rail, air, electricity, telecommunications, gas, water and wastewater treatment services.”

It is noted that the rezoning of the subject lands will not prejudice the implementation of the above zoning objective and any future development proposals on the subject lands will be subjected to the standard assessment criteria as part of the development management process ensuring appropriate provision of infrastructural services.

1.2 Purpose of this Submission

The purpose and objective of this submission is to demonstrate to CCC the merits of rezoning the subject lands to 'Residential' in Draft Plan and to illustrate the potential opportunities that they present to deliver much needed housing during the Plan period.

To justify the rezoning of the subject lands to 'Residential', an analysis of the relevant core strategy is provided in Section 5, as well as a residential site comparison demonstrating the appropriateness of zoning and developing the subject site for residential uses.

2 Site Context

The subject site, comprising c. 7.15 ha, is located approximately 3 km south of Ennis town centre. The lands are bounded to north by Clare GAA lands, agricultural lands, and residential development, to the east by agricultural lands, to the south by agricultural lands and residential development and to the west by the R458.



Figure 2.1 Indicative location of the subject site (red star) in the context of the Ennis settlement (Source KPMG FA, 2022).

The subject site is located adjacent to the Clareabbey bus stop which is served by the 343 (Designation: Limerick Train Station), 51 (Destination: Cork) and the 343X (Designation: Limerick Train Station) bus routes.

The site is approximately a 10 minute cycle from the town centre, as demonstrated in Figure 2.2 below.

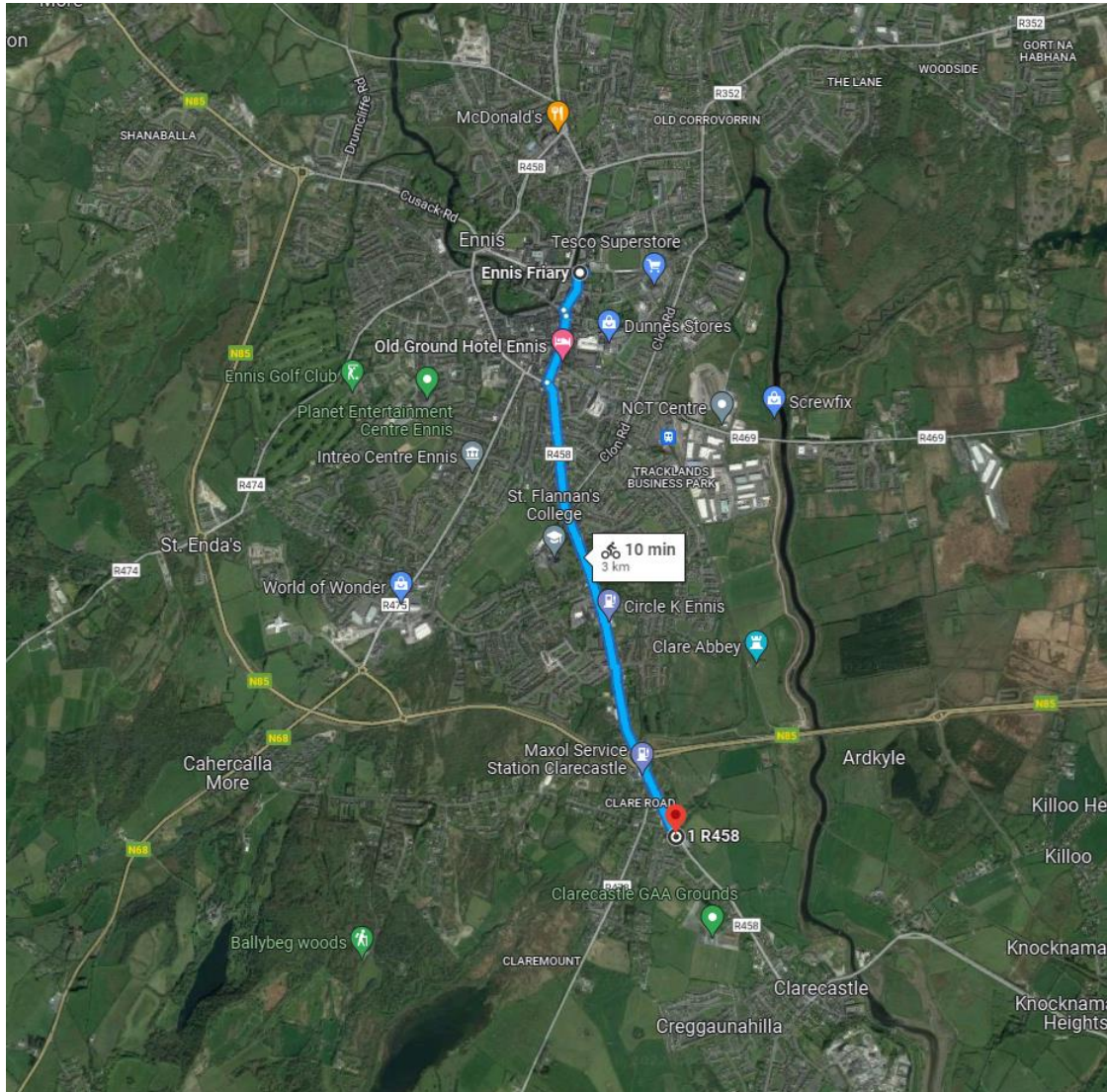


Figure 2.2 – Cycle distance from subject site to town centre (Source: Google Maps)

Ennis is a gateway to County Clare and to international attractions such as the Cliffs of Moher and the Burren. It is served by an excellent network of motorway, national, secondary, regional and local roads. There are bus and rail services to all major cities and towns in Ireland and Ennis’ proximity to Shannon International Airport also confers a unique advantage on the Town.

Ennis is set to become a University Town following the designation of a new Technological University in the Mid-West and Midlands. Athlone Institute of Technology and Limerick Institute of Technology (LIT) has been identified as Ireland’s next technological university. LIT’s Ennis Campus on Bindon Street will fall under the remit of the new educational institution.

2.1 Planning History

The subject site was previously zoned as 'Residential', 'Open Space' and 'Infrastructureal Safeguard' in the *Ennis & Environs Development Plan 2003*. These zonings were incorporated into the succeeding *Ennis & Environs Development Plan 2008-2014*. However, the subject site was not included amongst the lands identified as 'Phase 1'. The subject site was later rezoned to 'Agriculture', 'Utilities' and 'Open Space' via the current *Clare County Development Plan 2017-2023*

Below is a review of the relevant planning history for the subject site.

Reg Ref: 06642

In April 2007, permission was granted on the subject site for (a) construction of an entrance and roundabout and re-alignment of the existing N18, (b) the erection of two ESB masts (c) construction of 22 no. townhouses, 21 no. terraced dwellings, 72 no. semi-detached dwellings, and 104 no. apartments in 3 no. blocks (Block 1 is 2-storey and consists of 32 no. apartments and Blocks 2 and 3 are 3-storey and consist of 36 no. apartments each) (d) 2-storey creche, and (e) all associated site works.

Reg Ref: 12249

In June 2012, permission was sought to Extend the Appropriate Period of Planning Permission P06/642. This application was refused for the following reasons:

1. The proposal to extend the appropriate period of the grant of permission Ref 06/642 is not in accordance with Section 42 of the Planning and Development Acts 2000-2010, as per section 42 (1) (a) (ii) (II), having regard to the significant changes in the Development Objectives of the development plan for the area (2008-2014 Ennis and Environs Development Plan, as amended), with regard to the phasing of developments as outlined in 'Policy SS6 Phase 1' of the Plan. As such, it is considered that there have been significant changes in the development objectives in the development plan for the area of the Planning Authority since the date of the grant of permission such that the development would no longer be consistent with the proper planning and sustainable development of the area.
2. The proposal to extend the appropriate period of the grant of permission ref 06/642 is not in accordance with Section 42 of the Planning and Development Acts 2000-2010, as per section 42 (1) (a) (ii) (III), having regard to the Ministerial Guidelines as issued under Section 28 of the Planning and Development Acts (2000 – 2010), with regard to apartment design standards, namely "Sustainable Urban Housing: Design Standards for New Apartments (2007). As the apartments which were previously granted permission do not now meet the recommended minimum requirements for balcony space and storage space, it is considered that the proposal to extend the appropriate period would be inconsistent with the proper planning and sustainable development of the area having regard to any guidelines issued by the Minister under section 28.
3. ~~An extension of the appropriate period of validity~~ ^{The proposal to extend} of planning permission Reference 06/642 is ~~refused as~~ ^{not in accordance with} the requirements of Article 42 of the Planning and Development Regulations 2001, as amended by Article 6 of the Planning and Development Regulations 2010 ~~have not been met~~, as the following have not been submitted:

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It is worth noting that residential development was once considered to be appropriate at this location and a significant quantum of residential development was permitted. It is acknowledged that this land was later rezoned as 'Agricultural' in an effort to direct development towards the town centre. However, it is submitted that as the settlement of Ennis expanded, and continues to expand in terms of population and footprint, the subject lands are now considered to be strategically positioned within the settlement boundary and within an established residential setting. Furthermore the dezoning of the lands from residential to agriculture coincided with the economic crash and the collapse of the housing and property market. It is submitted that the lands should be considered in the current climate of a housing shortage, sustained population growth and a buoyant property and employment market.

The lands present a viable and tangible opportunity to deliver residential development that can tie in with and connect to the existing residential communities to the west of the R458. The lands straddle a GAA pitch and the Clare GAA Head office, a community facility reliant on residential development to maintain participation rates and represent a suitable land bank to deliver an appropriate land use for the site's context and surrounding environment.

3 A Socio-Economic Profile and Social Infrastructure Audit

A Socio-economic profile of the area surrounding the subject site has been prepared to provide an evidenced based justification in support of the key arguments pertaining to the proposed rezoning of subject site to residential land use. This section presents the findings of this profile with a specific focus on demand for housing. An audit of existing social infrastructure has been undertaken to demonstrate that there is sufficient provision of social infrastructure within the Ennis settlement to cater for additional demand generated by future housing.

3.1 Study Area

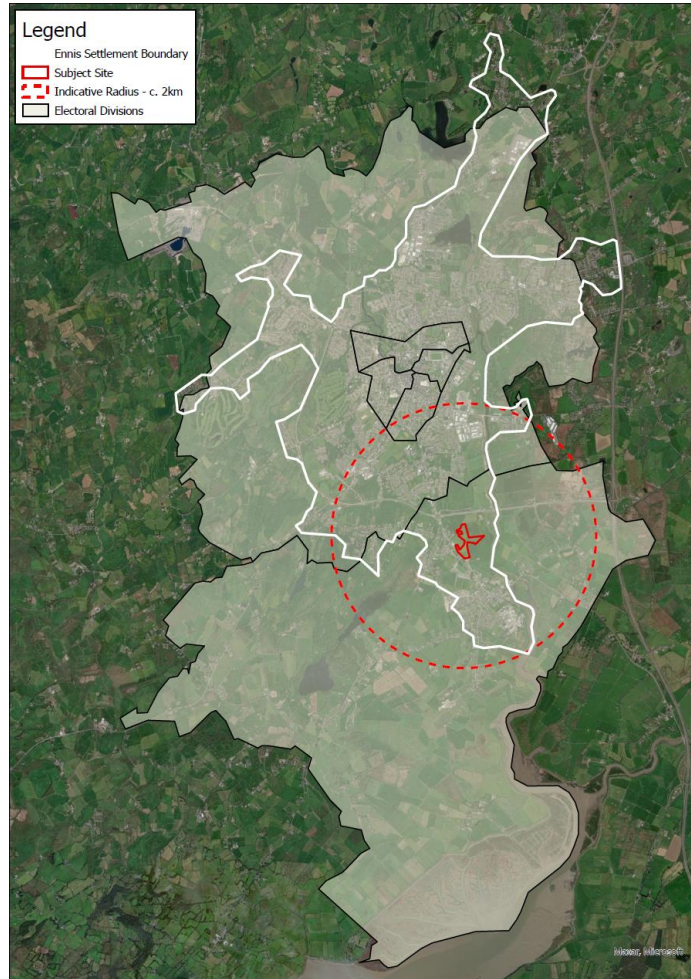


Figure 3.1 Extent of Demographic Study Area comprised of 6 no. Electoral Divisions Source: CSO 2016/KPMG -FA

The study area has been defined using 6 no. Electoral Divisions (Eds) which are considered to provide the most accurate representation of the Ennis Settlement (Figure 3.1) as they include the vast majority of residential settlement within Ennis within their collective boundaries. The Ennis settlement boundary as defined by the CSO is shown via a white line in Figure 3.1.

This report considered the socio-economic profile status of the surrounding area in order to assess the suitability of changing the land use zoning of the subject site to 'Residential'.

3.2 Demand for Housing in Clare and the Study Area

3.2.1 Population Change

The population of the study area has grown by 1.6% over a 5 year period (2011-2016) and by 3.3% over a 10 year period (2006-2016). The population growth between 2011 and 2016 was slightly higher than the overall county, which saw a growth of 1.4%.

Table 3.1 – Population Change

	2006	2011	2016	Pop Change 11-16 (%)	Pop Change 06-16 (%)
Study Area	24,837	25,246	25,655	1.6%	3.3%
Clare County	110,950	117,196	118,817	1.4%	7.2%

3.2.2 Current Housing Supply

As shown in Table 3.2, the number of private households has steadily increased over the last 10 years. In 2016, the average household size in the Study Area was 2.56.

According to the 2016 census, a total of 98 houses were built within the Study Area between 2011-2016, which is quite a low figure for a settlement with an overall population of 25,655 people (2016). Considering that the target increase for housing units within Ennis as outlined in the current Development Plan was 3,166 units between 2011 and 2023, it estimated that this target will not be met. This projection is based on historic housing delivery trends and the fact that zoned residential lands are not being brought forward expeditiously for development. Such inactivity should be prevented which further emphasises the need for encouraging housing provision on the development ready subject lands facilitated by their rezoning as sought under this submission.

Table 3.2 – Number of Private Households

	2006	2011	2016
Study Area	8,864	9,649	9,849

As illustrated in Table 3.3, in terms of occupancy, the number private households that are owner occupied with a mortgage experienced a decrease in the 5 year period of 2011-2016. The number of private households that are owner occupied without a mortgage experienced an increase during this period. The number of private households renting either from a Local Authority or a Voluntary Body also increased during this period.

Table 3.3 – Permanent private households by type of occupancy

	2011	2016
Owner occupied with mortgage	3,312	2,914
Owner occupied no mortgage	2,834	3,204
Rented from Private Landlord	2,361	2,265
Rented from a Local Authority	803	922
Rented from a Voluntary Body	86	101
Occupied free of rent	107	117
Not Stated	143	322
Total	9,646	9,845

In respect of the types of accommodation within the Study Area, the largest group in 2011 and 2016 were those residing in houses, with the second largest group residing in apartments. Notably, between 2011-2016, there was a small decrease in groups residing in housing (0.2%) and an increase in the group residing in apartments (1%).

Table 3.4 – Private households by type of accommodation

Private households by type of accommodation	No. Households 2011	(%)	No. Households 2016	(%)
House/Bungalow	8,636	89.5	8,794	89.3
Flat/Apartment	826	8.6	950	9.6
Other	187	1.9	105	1
Total	9,649	100	9,849	100

3.2.3 Residential Rental Market

Residential Tenancies Board (RTB) data published by the CSO for the period 2010-2020 has been analysed to identify the rental market profile in Clare. The average rent has significantly increased over the last decade from €583 in Ennis to €734 (26%), which is higher than the county average of €725.

This would indicate that there is a growing demand for rental accommodation in the area. The subject site has the capacity to respond to this demand by providing residential units as part of an integrated scheme, across a variety of tenure types.

All Unit Types

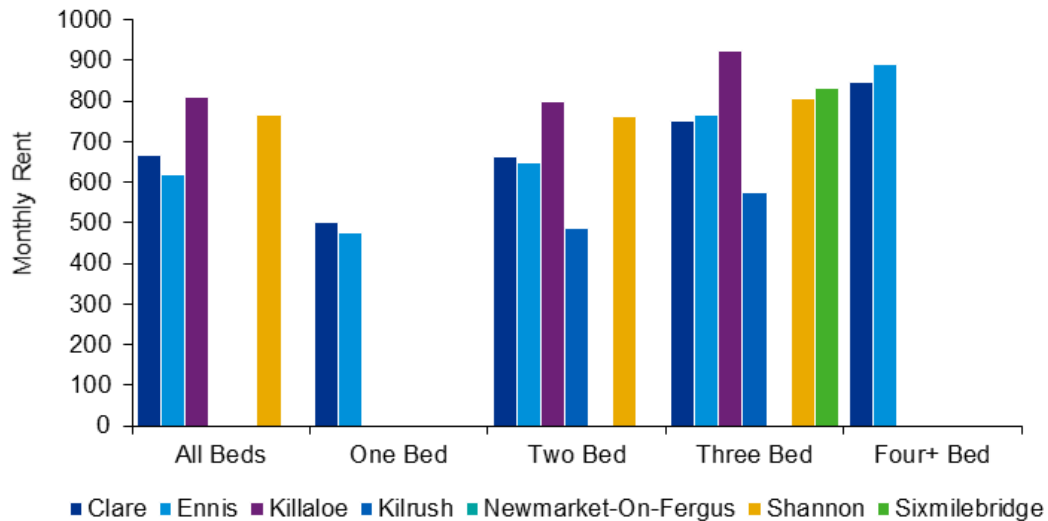


Figure 3.3 Average Monthly Rent 2010-2020 (Source RTB)

3.2.4 Income

In terms of income, the “weighted average” income for Co. Clare based on the 2016 Median was €43,824, while the “weighted average” income for Ennis based on 2016 Median was €42,476.

3.2.5 Projected Population Change

According to the NPF Implementation Road Map (2018), Clare is projected to experience a population uplift of 10,500-12,500 persons between 2016-2026 and an uplift of 15,000-18,000 persons between 2016-2031.

In respect of Ennis, the Core Strategy provides that the population allocation for the life of the plan is 2,705 persons.

3.2.6 Housing Need According the Clare Housing Strategy

According to the Clare County Housing Need Demand Assessment¹, the Housing Supply Target for County Clare in the Clare County Development Plan 2023 2029 will plan for 4,500 new households over the plan period. The HNDA analysis indicates that over the (seven) years 2023-2029, approximately 19% of new households will require social housing and approximately 5% will require affordable housing. A further 51% of

¹ Clare Housing Strategy – Volume 8 Draft Clare County Development Plan 2023-2029

households will be able to purchase a home, while approximately 25% will fall into the private rented sector. **Of the 4,500 new dwellings required over the life of plan, a total of 1,550 have been allocated to Ennis.**

3.2.7 Future Housing Supply

A review of the planning pipeline was undertaken in Ennis. In terms of pipeline permissions, there is a total of 585 no. units. Of these units, a total of 225 no. units have commenced.

Table 3.5 – Planning Pipeline

Reg Ref:	No. Units Permitted	Status
16758	61 no. housing units	Commenced
17237	39 no. housing units	Commenced
17400	14 no. housing units	Commenced
17977	51 no. housing units	Not Commenced
18137	25 no. housing units	Appeal Withdrawn – Not Commenced
181007	25 no. housing units	Commenced
18811	99 no. housing units	Site currently on the market
199005	40 no. housing units	Commenced
19167	14 no. apartment units	Not Commenced
19196	68 no. apartment and housing units	Commenced
19244	27 no. housing units	Not Commenced
20158	22 no. housing units	Not Commenced
20172	16 no. housing units	Not Commenced
20618	18 no. housing units	Commenced
21135	35 no. housing units	Not Commenced
21153	21 no. housing units	Not Commenced
21211	10 no. housing units	Not Commenced
Total Units	585 units	

Assuming that all of the units in the planning pipeline came forward, they would have the potential to generate a population of 1,498 persons (calculated using no. units 585 average household size in the Study Area, 2.56).

As illustrated in Table 3.5, there are a significant number of extant permissions on zoned land that have yet to commence development with some permissions approaching their expiration date. There is a real and genuine concern that failing to permit residential development on the subject lands, which are development ready with an active promoter

keen to commence construction, would result in housing supply continuing to lag behind demand in Ennis thereby exacerbating the current housing crisis.

3.2.8 Estimated Future Housing Profile

A projection of the future housing profile of the Study Area was undertaken by KPMG Future Analytics. According to this review, in respect of housing composition, the number of 1 person households is to increase by 1.9% (Figure 3.2). The second largest group in terms of household composition is the 2 person household.

Forecast Household Composition 2023-2028

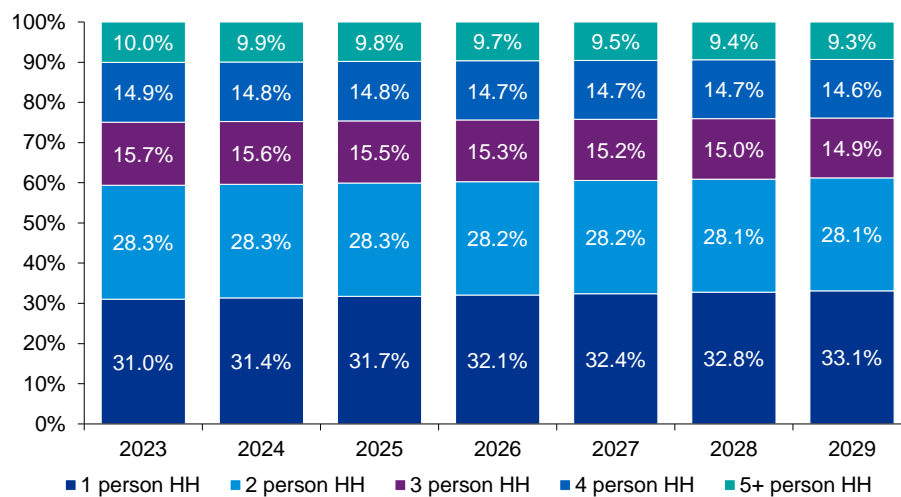


Figure 3.4 Household Composition (Source: KPMG-FA)

In regard to dwelling type, the percentage of households residing in houses is projected to stay the same up to 2029, while the percentage of households residing in apartments is projected to decrease very slightly.

Table 3.5 – Forecasted Dwelling Type

Forecasted Dwelling Type	2023	2024	2025	2026	2027	2028	2029
House/Bungalow	90.3%	90.3%	90.3%	90.3%	90.3%	90.3%	90.3%
Flat/Apartment	9.7%	9.7%	9.7%	9.7%	9.7%	9.6%	9.6%

3.2.9 Social Infrastructure to Support Future Housing

As part of this report, a high level review of the existing social infrastructure in the area has been undertaken in order to demonstrate the suitability of the site for residential

zoning. Having regard to the rural nature of the lands surrounding Ennis town centre, the settlement boundary of Ennis² was considered to be the appropriate catchment area for the social infrastructure audit. A 2km buffer around the subject site was also examined. In total, 175 facilities were located within the settlement boundary of Ennis, 34 no. of which were located within a 2km radius of the subject site. A breakdown of each social infrastructure category is provided below.

Education & Childcare

As illustrated in Figure 3.5 below, there are total of 45 educational facilities within the settlement boundary of Ennis. These include 30 no. childcare facilities, 4 no. post-primary schools, 9 no. primary schools and 2 no. special needs facilities. Of the 45 no. facilities identified, a total of 8 no. were located within 2km of the subject site. These include 6 no. childcare facilities, 1 no. primary school and 1 no. primacy school.

A full list of these facilities is provided in Section 8 Appendix.

Open Space

As illustrated in Figure 3.6 below, there are a total of 45 no. Open Space facilities were identified within the settlement boundary of Ennis. These include 2 no. golf courses, 3 no. parks, 10 no. pitches, 6 no. playgrounds, 12 no. sports facilities, 5 no. sports ground, 5 no. sports centres, 1 no. stadium and 2 no. tracks. It is worth noting that 3 no. of these facilities are located in close proximity to the subject site.

A full list of these facilities is provided in Section 8 Appendix.

Community & Civic Services

As illustrated Figure 3.6 below, a total of 15 no. Community and Civic Services were identified within the settlement boundary. These include 2 no. community centres, 1 no. community centre, 1 no. court house, 1no. fire station, 3 no. libraries, 2 no. museums, 1 no. Garda station, 1 no. post office and 1 no. theatre. There is a post-office located within 2 km of the subject site. The remainder of the community and civic services are focused in the core of the town centre but are a short distance from the subject site.

A full list of these facilities is provided in Section 8 Appendix.

Retail

As illustrated in Figure 3.6 below, a total of 7 no. convenience retail facilities were identified within the settlement boundary. Of these 7 no. facilities, 1 no. (Centra) is located within 2 km of the subject site.

² Settlement Boundary defined by the CSO

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On behalf of Marram Properties Ltd

A full list of these facilities is provided in Section 8 Appendix.

Health Facilities

As illustrated in Figure 3.7 below, a total of 50 no. Health Facilities were identified within the settlement boundary. These include 13 no. general practitioners, 4 no. health centres, 2 no. hospitals, 9 no. mental health facilities, 4 no. nursing homes and 18 no. pharmacies. It is worth noting that 7 no. of these facilities are located within 2km of the subject site. These include 1 no. nursing home, 3 no. pharmacies and 3 no. general practitioners.

A full list of these facilities is provided in Section 8 Appendix.

Places of Worship

As illustrated in Figure 3.7 below, a total of 12 no. Places of Worship were identified within the settlement boundary. These include 3 no. burial sites/cemeteries and 9 no. churches. Of these facilities, 3 no. are located within 2 km of the subject site.

A full list of these facilities is provided in Section 8 Appendix.

SIA Conclusion

As demonstrated above, the area is well served by social infrastructure, both at a settlement level and at an individual site level. The excellent provision of social infrastructure that presently exists within the area further highlights the suitability of the subject lands for redevelopment. It is considered that any future development on the subject lands will be adequately supported by existing social infrastructure and any notable gaps could be addressed as part of an integrated residential led scheme on the lands. Furthermore, in order to fully capitalise on these amenities and to ensure that there remains a critical mass to support their continued function and operation, it is respectfully suggested that the subject lands represent an appropriate location to guide future residential development.

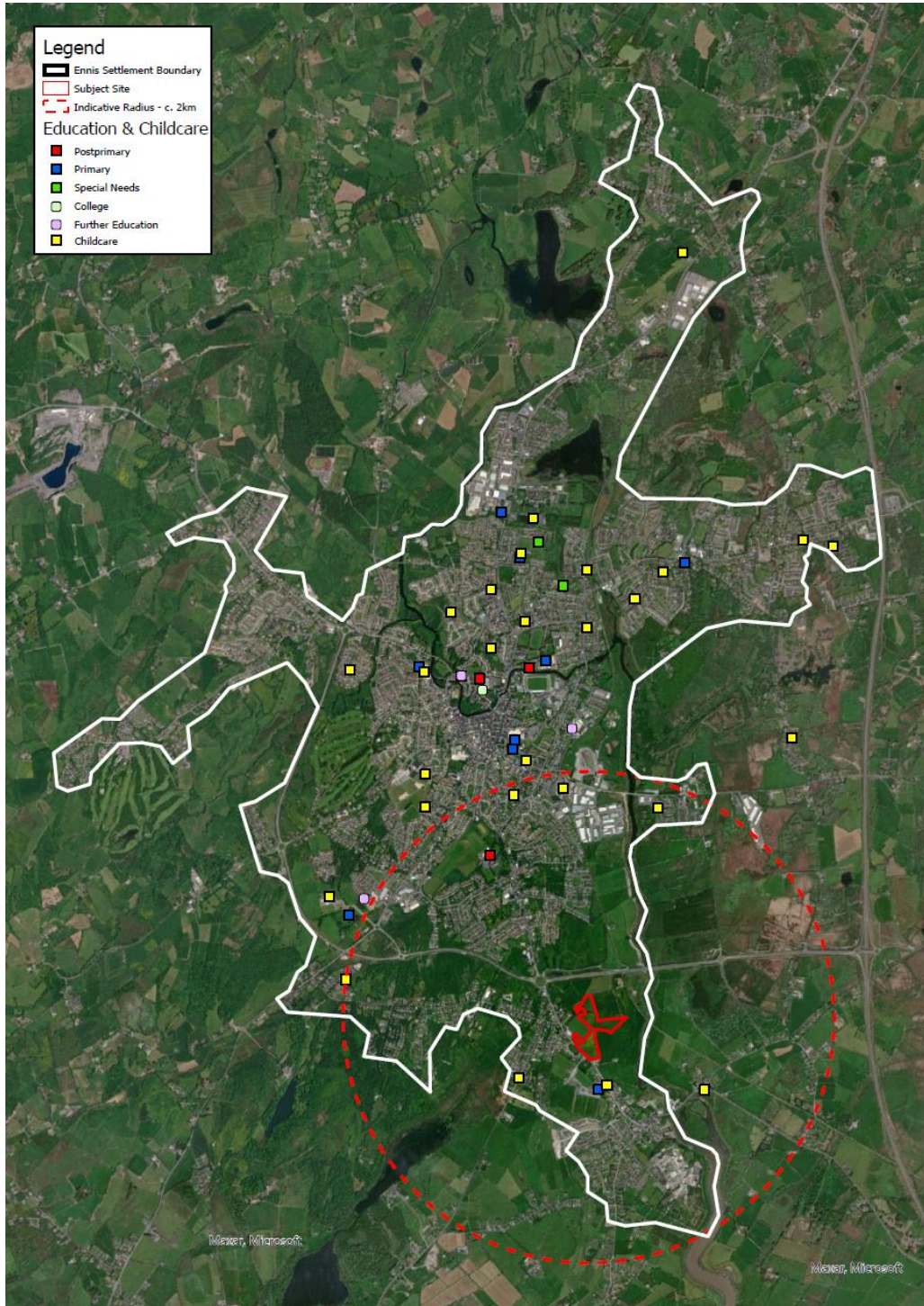


Figure 3.5 Education & Childcare Facilities within the Ennis Settlement Boundary. Facilities within a 2km buffer of the subject site are also indicated in red.

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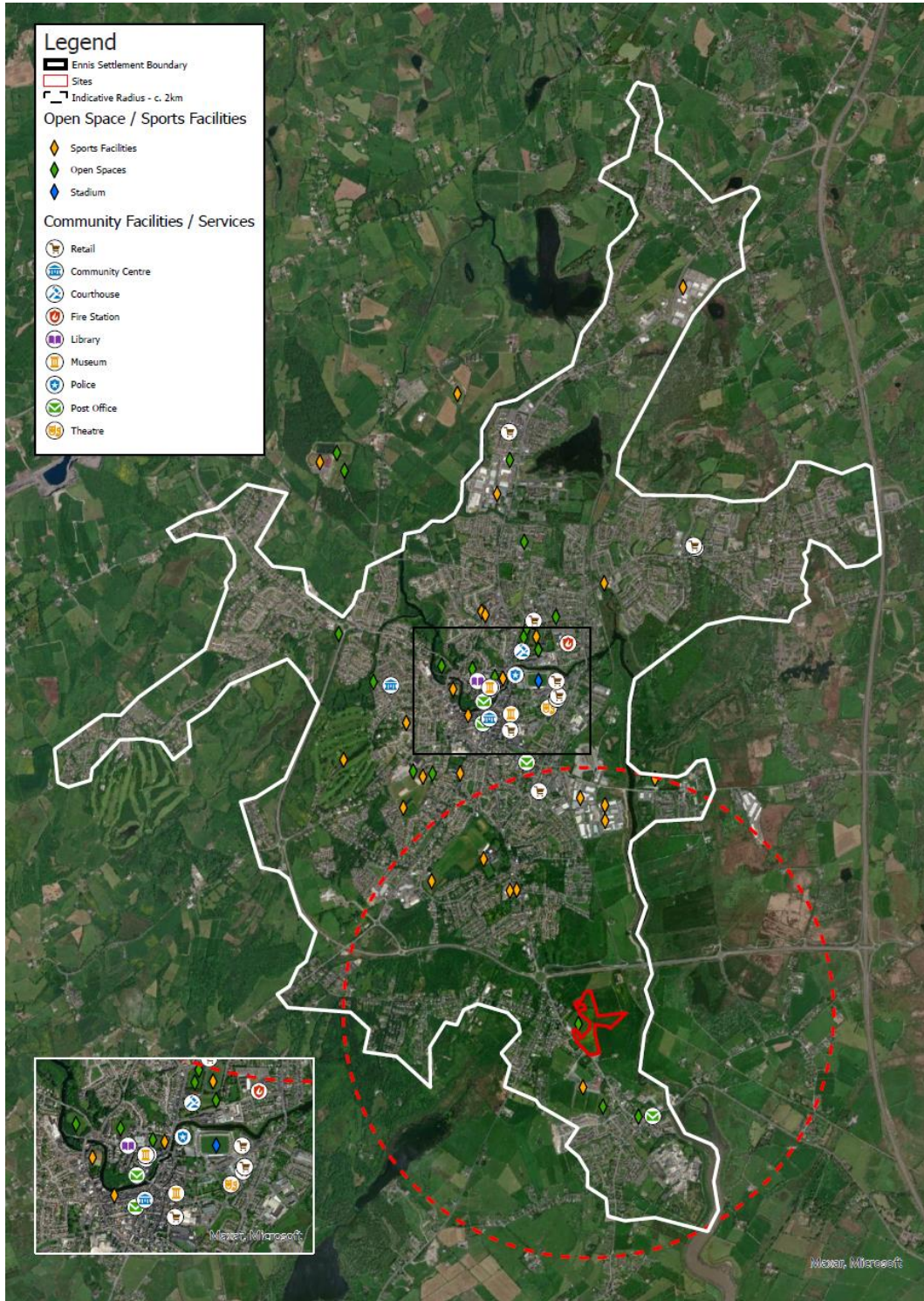


Figure 3.6 Community Facilities and Services within the Ennis Settlement Boundary. Facilities within a 2km buffer of the subject site are also indicated in red.

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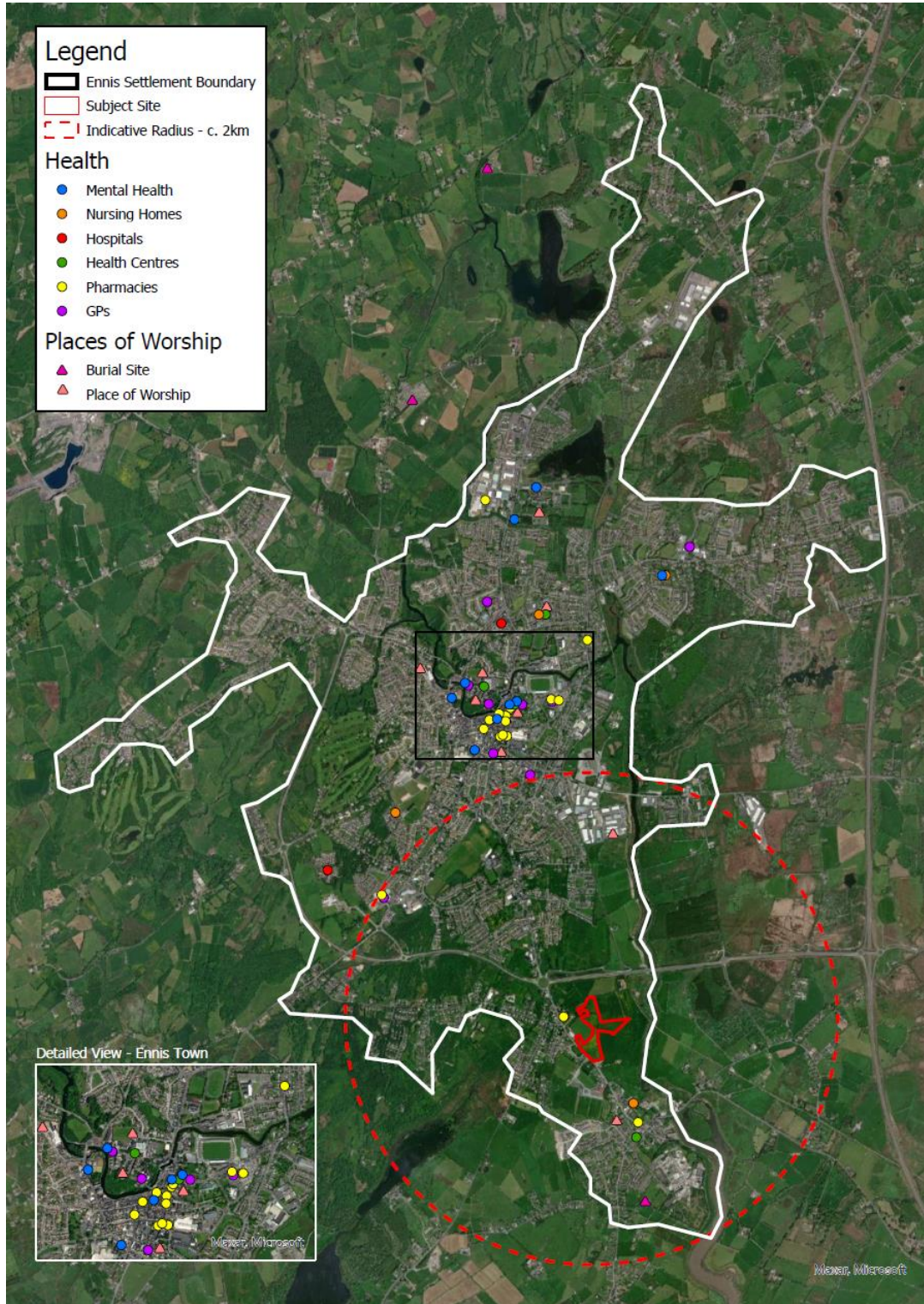


Figure 3.7 Health Facilities and Places of Worship within the Ennis Settlement Boundary. Facilities within a 2km buffer of the subject site are also indicated in red.

3.2.10 Conclusion

This socio-economic profile and social infrastructure audit demonstrated the following:

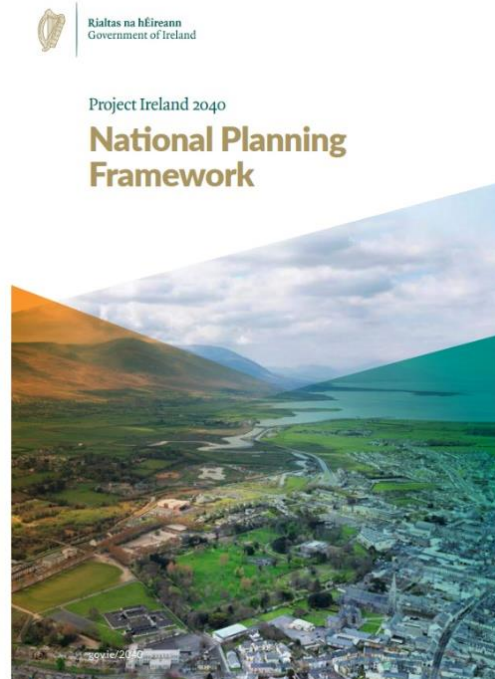
- The Study Area has experienced growth in population over a 5 and 10 year period. The growth in population over the last 5 years was slightly higher than the increase at county level.
- Population is projected to increase by 2,705 within the life of the Draft Plan in order to meet the requirements of the Core Strategy. Ennis could also see an increase of 1,498 persons, should all 585 pipeline units come forward.
- The average rent price in Ennis period for all unit types has significantly increased over a 10 year by approximately 26%.
- The average income in the settlement is €42,476, which is similar to that at county level (€43,824).
- The review of the demographic profile has demonstrated that there is a current need for housing which is compounded by an increase population that has occurred over the last decade and a projected increase in population that is expected over the life of the development plan.
- The settlement of Ennis is well served by social infrastructure, with 175 facilities identified within the settlement and a total of 34 no. facilities identified with 2 km of the subject site.

4 Policy Context

This section sets out the planning and development policies and objectives at national level that are relevant to this submission.

4.1 National Planning Framework: Project Ireland 2040

The National Planning Framework: Ireland 2040 Our Plan (NPF) defines the future planning and development of Ireland, replacing the former National Spatial Strategy for Ireland 2002–2020: People, Places and Potential (NSS). The NPF, alongside the recently published National Development Plan (2021-2030), combine to guide strategic development and infrastructure investment at national level. The NPF with the National Development Plan will also set the context for each of Ireland’s three regional assemblies to develop their Regional Spatial and Economic Strategies taking account of, and co-ordinating with, Local Authority, County and City Development Plans in a manner that will ensure national, regional and local plans align.



The NPF strives to prioritise urban areas as the preferable location in which to accommodate the State’s future population and to drive enterprise and employment opportunities. In this regard, National Policy Objective (NPO) 5 seeks to,

“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”

Such areas allow for the creation of critical mass that allows services and infrastructure to be more effectively and easily provided. Targeting development in urban areas also reduces negative impacts on the natural environment and the loss of valuable, scarce land resources and the emission of greenhouse gases. To achieve this, the NPF includes NPO 9 which allows for select settlements to be *“identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages”*. As Clare’s capital, Ennis will play a key role in driving the growth of the county over the plan period and has been identified for significant growth. Such growth will require the provision of housing substantially above recent historical patterns of delivery and as such the subject lands present a viable opportunity to realise these objectives on the ground.

NPOs 3a and 3c place further emphasis on strengthening critical mass and urban consolidation by identifying the aim to *“Deliver at least 40% of all new homes nationally,*

within the built-up footprint of existing settlements” and “Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints”.

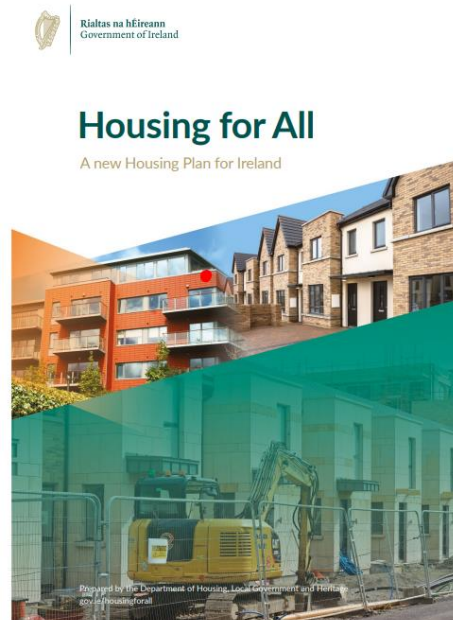
The NPF refers to the need to create places that can foster enterprise and innovation and attract investment and talent. National Strategic Outcome 5 seeks to deliver ‘A Strong Economy, supported by Enterprise, Innovation and Skills’. Clearly, the NPF is seeking to drive increasing levels of employment opportunities, population growth and residential development into urban areas, as the most sustainable and resilient locations in which to secure Ireland’s future.

The NPF Implementation Road Map (2018) provides that Clare is projected to experience an population uplift of 10,500-12,500 persons between 2016-2026 and an uplift of 15,000-18,000 persons between 2016-2031. As outlined above, such growth will require the accelerated delivery of much needed housing both within and in close proximity to urban centres. The redevelopment of the subject lands which are strategically located within the Ennis settlement boundary should be encouraged to positively contribute to the Authority delivering upon the aims and objectives of the NPF in terms of accommodating projected population growth in existing built up areas.

4.2 Housing for All

‘Housing for All: A New Housing Plan for Ireland’ was published in 2021. It represents the Government’s housing plan to 2030, replacing Rebuilding Ireland. It reiterates a national target of building an average of 33,000 new homes every year from 2021 to 2030, including approximately 10,000 social homes and 6,000 affordable homes for purchase or rent. It provides a comprehensive strategy and action plan across all tenures and elements of the Irish housing system, guided by four main ‘pathways’ to improving the housing system:

- Supporting home ownership and increasing affordability
- Eradicating homelessness, increasing social housing delivery and supporting social inclusion
- Increasing new housing supply
- Addressing vacancy and efficient use of existing stock



Housing for All has the largest ever housing budget in the history of the State to support these pathways, with in excess of €20bn in funding through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years. Local Authorities will play a key role (in partnership with Approved Housing Bodies) in delivering new social and affordable homes under Housing for All. Each Local Authority

will produce a Housing Delivery Action Plan by December 2021 to translate national targets into clear local targets and actions, underpinned by an evidence-based assessment of local housing need. The strategy reiterates the importance of compact growth and sustainable development, with national housing policy committed to delivering town centre and rural regeneration. For rural towns and villages, a new ‘Croí Cónaithe’ Fund will be established to deliver serviced sites for housing (subject to available infrastructure) to attract people to build their own homes and refurbish vacant properties, enabling sustainable housing delivery in small towns and villages.

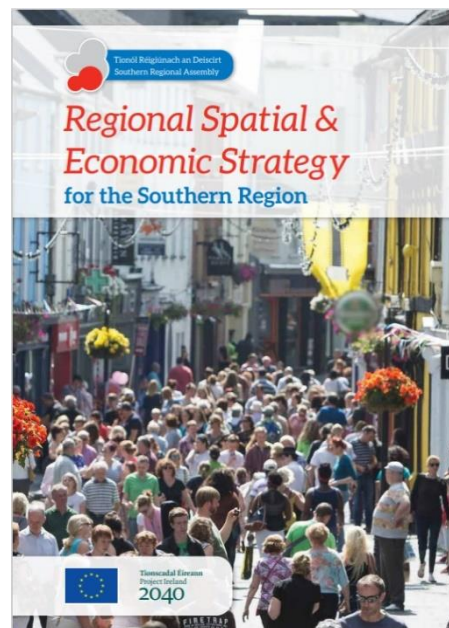
4.3 Regional Spatial & Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategy for the Southern Region (RSES) – is a 12-year strategic regional development framework to guide this change. The RSES primarily aims to support the delivery of the programme for change set out in Project Ireland 2040, the National Planning Framework (NPF) and the National Development Plan 2018-27 (NDP). As the regional tier of the national planning process, it will ensure coordination between the City and County Development Plans and Local Enterprise and Community Plans of the ten local authorities in the Region.

An innovative approach is taken to securing long-term transformational and rejuvenation-focused city growth through Metropolitan Strategic Area Plans (MASPs) for Cork, Limerick-Shannon and Waterford Metropolitan Areas and the identification of Key Towns, such as Ennis.

The RSES vision for the Southern Region is led by the need for transformative change. By 2040, the population of the Region will most likely grow by 380,000 people to reach almost two million. This growth will require new homes and new jobs. It also raises questions as to where our future population will live and work, what kind of quality of life will we enjoy and how we can adapt to the challenges we face such as climate change, regional disparity and global uncertainty. An unchecked “business as usual” scenario will diminish our quality of life, our environment, erode our competitiveness and compound regional disparity. There is a need for a different approach to planning for the future.

Key Towns were identified in accordance with NPF. They each play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. It is envisaged that the Key Towns will be a focus for significant growth (more than 30%).



As a Key Town, Ennis is described in the RSES as having a **“Large population scale urban centre functioning as self-sustaining regional drivers”**, and as **being “Strategically located urban centres with accessibility and significant influence in a sub-regional context.”**

Ennis, with a population of 25,276 in 2016, is the largest town in Munster and the fifth largest settlement in the Region. The triangle of Limerick-Shannon-Ennis is recognised as the economic engine of the Mid-West. The M18 has created a greater synergy and connection between Ennis and Galway and there is potential to attract economic drivers/ infrastructure such as data centres. In this context, Ennis should build on its current talent and skills offer and attract a higher level education campus. The preparation of the ‘Ennis 2040 Economic and Spatial Strategy’ offers an opportunity to create a long-term strategy for the sustainable development of the town. The implementation of these objectives and visions for Ennis will further heighten demand for housing with the subject lands representing a viable option to address this issue and ensure supply keeps pace with demand.

In order to sustain Ennis’ position as a regional driver, it is imperative that projected population growth can be readily accommodated within the settlement boundary. Recent inactivity in terms of housing completions accentuates the need for development ready lands in strategic locations with active promoters such as the subject site to be zoned accordingly to permit residential land use.

4.4 Ennis 2040: Spatial and Economic Strategy

‘Ennis 2040’ is a strategy that sets out a long-term vision for Ennis to 2040 and beyond. The strategy aims to deliver economic investment and benefits which will extend to all parts of the County and make housing, jobs, amenity and services easier to access for all. The strategy aims to build communities and make Ennis one of the best places to live, work and visit. The strategy will aim to make the urban core more liveable for young and old alike, and as attractive as suburban and more peripheral locations.

Ennis 2040 seeks to increase and diversify the local employment base. It targets employers seeking to locate in more urban settings with a focus on employees’ access to housing, amenity areas, transport, shopping, and public services. This recognises the global shift towards urban centres, a trend supported by national and regional spatial planning.

The strategy sets out how Inner area could deliver an average gross density of 45-50 units/ha, and that this would result in a capacity for an additional 1,350-1,500 homes in the town centre by 2040. These units would primarily be two-bed in size, with some one-bedroom and three-bedroom units. In the Intermediate area the gross densities are anticipated to be approximately 30 units/ha, which would have the capacity to provide 3,500-4,500 units by 2040 with a higher proportion of three bedroom units than in the town centre area. In the Outer area residential development is expected to deliver a lower density at approximately 15 units/ha, this has the potential to deliver an additional 700-800 units by 2040. While Ennis 2040 will inform the new and future County Development Plans, it is a long-term, non-statutory strategy and it will be the responsibility of the County Development Plan to provide land use zoning to deliver new housing in accordance with overall County housing targets.

The subject site is capable of supporting the Ennis 2040 strategy by bringing forward housing in the outer area of Ennis and in turn contributing to the overall County housing targets. An integrated development proposal at this location with a mix of tenures would deliver on the objective of Ennis 2040 to make the suburban and peripheral locations more attractive and liveable for all age groups.

4.5 Clare County Development Plan 2017-2023 & Ennis Municipal District Written Statement & Settlement Plans

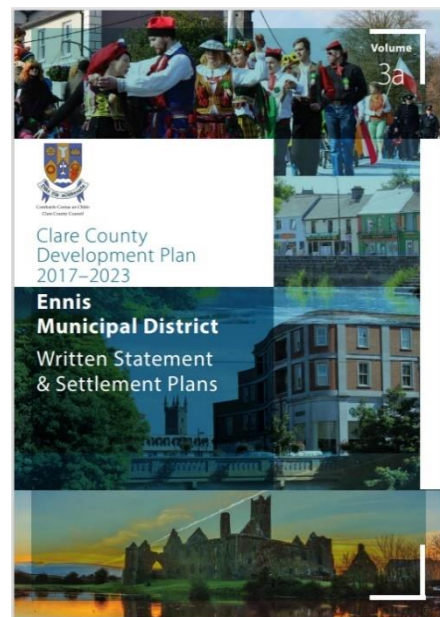
In terms of settlement hierarchy, Ennis is designated as the 'County Town/Hub', as per the National Spatial Strategy (NSS).

The Development Plan's focus on the delivery of housing in the county is reflected in the following policies.

CDP4.2 Development Plan Objective: Facilitating the Housing Needs of the Population: A It is an objective of Clare County Council: a To facilitate the housing needs of the existing and future population of County Clare through the management of housing development throughout the County in accordance with the Settlement Strategy

CDP4.3 Development Plan Objective: Living in our Towns and Villages: C To encourage the development of new residential accommodation in or adjoining town centres and to ensure that such developments provide a range of accommodation types and tenures and a high level of residential amenity

CDP4.7 Development Plan Objective: Housing Mix A To secure the development of a mix of house types and sizes throughout the County to meet the needs of the likely future population in accordance with the guidance set out in the Housing Strategy and the Guidelines on Sustainable Residential Development in Urban Areas



4.6 Draft Clare County Development Plan 2023-2029 & Volume 3a Ennis Municipal District Settlement Plans

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The Draft Clare County Development Plan 2023-2029 (Draft Plan) is now at **Stage 2** of its process, having gone on public display on 24 January 2022. The Draft Plan has placed an emphasis on supporting the delivery of the '10 minute town concept'. The 10 Minute Town Concept seeks to have all community facilities and services accessible within a 10 minute walk or cycle from homes or are accessible by public transport services connecting people to larger scaled settlements. Ennis has the characteristics and potential to lead the way as Ireland's first '10 Minute Town'. **It is worth noting that the subject site is positioned within a 10 minute cycle distance from the town centre**, as illustrated in Figure 2.2 above and further illustrated in Figure 4.1. Furthermore, part of the route from the subject site to the town centre has a designated cycle path, providing a safe connection for residents.

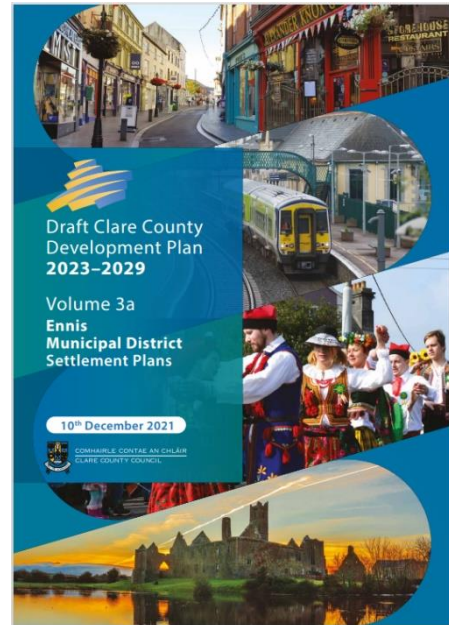


Figure 4.1 Section of R458 adjacent to the subject site with designated cycle lane.

The Draft Plan notes that Ennis is designated as a 'Key Town' in the RSES, and as both the County Town for Clare and a University Town it is an important residential, educational, service and commercial centre which provides significant levels of employment.

The Ennis 2040 Spatial and Economic Strategy has a town centre first focus and also looks to prioritise sites outside the town centre that will support compact growth and realise economic opportunities for Ennis and Clare into the future. The subject site is capable of delivering on these objectives as serviced land that is

strategically located with direct cycle linkages to the settlement centre. The development of these lands supports the implementation of the '10 minute town concept' through the delivery of housing at such locations.

In Ennis, the aim is for each neighbourhood to be a high-quality place to live, with essential services provided in close proximity to residential areas. In order to meet the overall goal for the future development of housing and sustainable neighbourhoods, the following strategic aims will be pursued in the settlement area:

- To plan for a population growth in Ennis in excess of 30% by 2040.
- To ensure that sufficient lands are zoned for residential use in the settlement of Ennis to accommodate population growth targets To promote the development of residential serviced lands to provide for a high-quality urban environment to create sustainable residential communities with an appropriate mix of housing types and densities, together with complementary land uses such as community facilities, and public transport linkages to serve the current and future residential population of Ennis
- To deliver up to 30% of all new homes targeted for Ennis within the existing built-up footprint.
- To promote the creation of strong, vibrant neighbourhoods in the Ennis area, each with a range of services and amenities which are easily accessible to local residents and attractive for growth.
- To ensure delivery of the physical and social infrastructure necessary to facilitate population growth and community development.
- To support the delivery of the '10 Minute Town' Concept.

The following is a Goal of the Draft Plan:

Goal 12 Accessible Housing and Sustainable Neighbourhoods

An Ennis which achieves a sustainable and balanced population increase by providing a high quality and mix of housing for all members of the community, whilst achieving sustainable neighbourhoods and improving place making.

4.6.1 Core Strategy

As Clare's key town, Ennis has been allocated the largest number of units in the Core Strategy. A total of 1,550 units have been allocated to Ennis, which equates to 58.90 ha of housing land.

The rezoning of the subject site would result in the development of residential units within the existing built-up settlement of Ennis, contributing to the Core Strategy allocation for the town.

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Settlement Typology	Settlement	2016 as a % of County	2016 Population	Core Strategy 2023-2029 Population Allocation	Housing Units	Brown Field (30%)	Density Units/ha	Housing Land Required in Ha	Zoning as per map in Ha
Key Town	Ennis	21.3	25,276	2,705	1,550	465	35/15	58.90	90.39

Further discussion in regard to the Core Strategy is provided in Section 5.1 below.

5 Residential Land Requirement

The Ennis settlement area is an important residential, service and commercial centre providing significant levels of employment. As the County **Key Town it is therefore at the top of the Settlement Hierarchy for the County.**

The Draft Plan identifies Greenfield lands to provide new housing and associated facilities. This approach aims to regenerate and ensure vibrancy in the Town with a broad choice of housing options for the diverse needs of the Town’s population profile.

The following section will discuss the requirement for the residential zoned land in Ennis and the alignment with the Core Strategy.

5.1 Extent of Residential Zoned Lands – Draft Plan

A total of 90.39 ha of land is zoned for residential development in the Draft Plan, of which 58.90 ha of land is required to meet the Core Strategy population allocation of 2,705 no. people. As Clare’s Key Town, Ennis has been identified as a key focus for the delivery of housing.

5.1.1 Clare County Council Serviced Land Assessment (SLA)

A Serviced Land Assessment was undertaken by Clare County Council and is included in the Draft Plan. A total of 20 no. sites have been identified for ‘Residential’ development and 11 no. sites were identified for ‘Low-Density Residential’ development within Ennis in the Draft Plan. This equates to 31 no. sites in total. All sites identified were also zoned for residential development via the current development plan. Section 5.2 below sets out the quantum of land associated with a granted planning application versus those that show no development activity.

As demonstrated in Figure 5.1 below, the majority of residential zoned land is concentrated to the west and east of the town centre, with very little in the south around Clarecastle. The subject lands represent a viable opportunity to directly address this imbalance.

Table 5.1 below provides a review of the sites, noting their current and draft zoning, and their current status.

Table 5.1 Serviced Land Assessment Sites

Draft Plan Site Ref	Site Areas	Draft Zoning	Current Zoning	Planning Pipeline	Status
R1	2	Residential	Residential	No extant applications	No visible dev activity
R2	14.92	Residential	Residential	Ref. 20172	Access roads visible
R3	0.79	Residential	Residential	No extant applications	No visible dev activity

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R4	2.17	Residential	Residential	Ref. 17977	<i>Site clearance</i>
R5	0.43	Residential	Residential	Ref. 21153 (adj)	<i>No visible dev activity</i>
R6	0.53	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R7	0.58	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R8	0.67	Residential	Residential	No extant applications	<i>Site clearance</i>
R9	2.29	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R10	3.15	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R11	0.68	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R12	3.62	Residential	Residential	Ref. 18137, 19196	<i>Site clearance, activity</i>
R13	12.81	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R14	0.95	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R15	6.01	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R16	1.6	Residential	Residential	No extant applications	<i>No visible dev activity</i>
R17	1.2	Residential	Residential	Ref 181007	<i>No visible dev activity</i>
R18	1.63	Residential	Residential	Ref. 21135	<i>Site clearance</i>
R19	1.3	Residential	Residential	Ref. 17400 (adj)	<i>No visible dev activity</i>
R20	0.42	Residential	Residential	Ref. 21153	<i>Floor plates visible</i>
LDR1	1.01	Low Density Residential	Low Density Residential	No extant applications	<i>No visible dev activity</i>
LDR2	2.33	Low Density Residential	Low Density Residential	No extant applications	<i>No visible dev activity</i>
LDR3	1.97	Low Density Residential	Low Density Residential	Ref. 198005 (adj)	<i>No visible dev activity</i>
LDR4	3.96	Low Density Residential	Low Density Residential	No extant applications	<i>No visible dev activity</i>
LDR5	1.28	Low Density Residential	Low Density Residential	Ref. 19244	<i>Floor plates visible</i>
LDR6	0.77	Low Density Residential	Low Density Residential	No extant applications	<i>No visible dev activity</i>
LDR7	10.12	Low Density Residential	Low Density Residential	Ref. 18811, 17237 (adj)	<i>No visible dev activity</i>
LDR8	0.94	Low Density Residential	Low Density Residential	Ref. 20158 (On Appeal)	<i>No visible dev activity</i>
LDR9	1.02	Low Density Residential	Low Density Residential	No extant applications	<i>No visible dev activity</i>
LDR10	6.54	Low Density Residential	Low Density Residential	No extant applications	<i>No visible dev activity</i>



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LDR11	2.67	Low Density Residential	Low Density Residential/Agriculture	No extant applications	<i>No visible dev activity</i>
Total	90.36				

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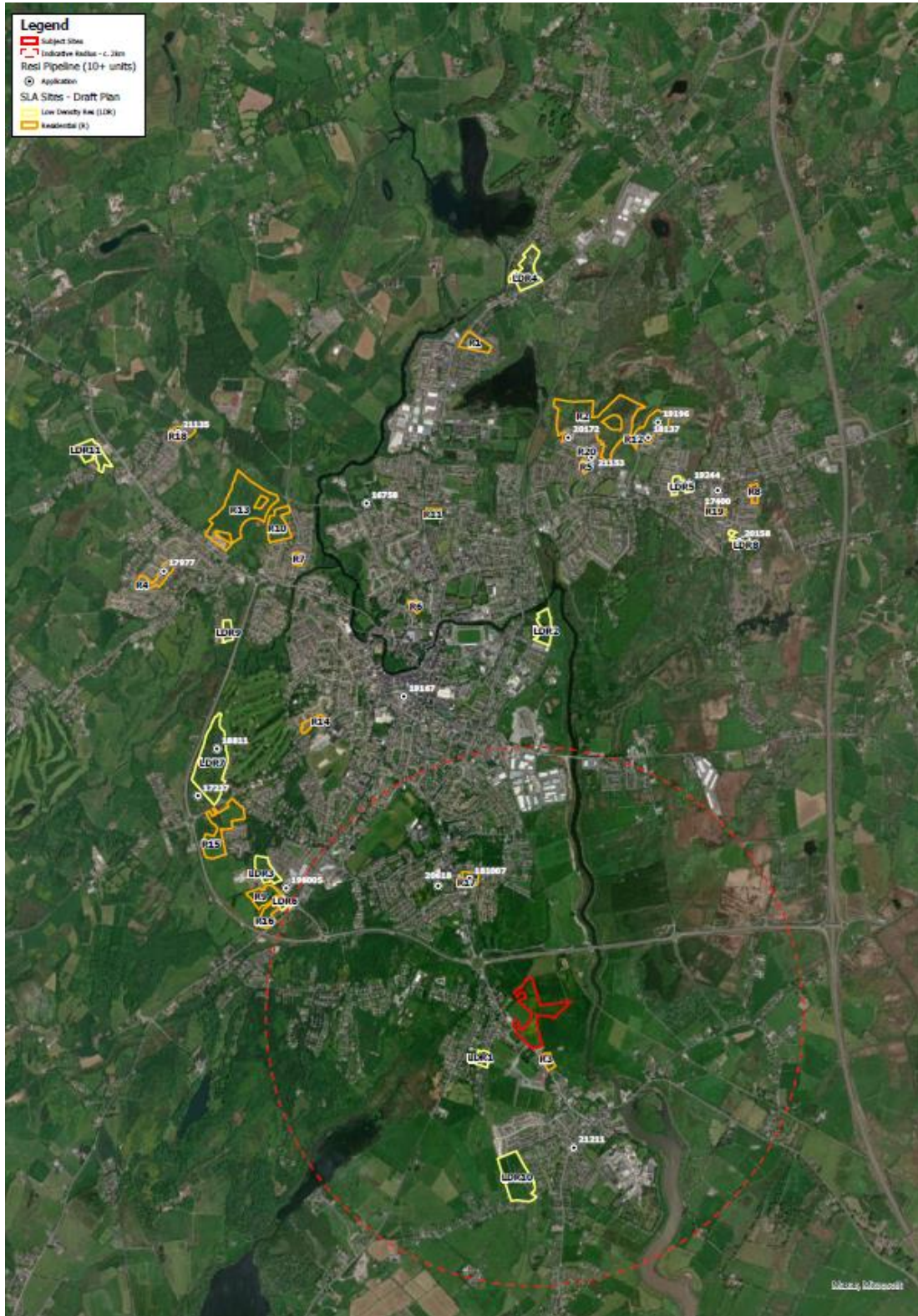


Figure 5.1 Serviced Land Assessment Sites shown with the subject site outlined in red

5.2 Suitability of Identified Sites for Future Housing Delivery

In Appendix 1 Introduction SLA, these sites were assessed against the following headings; Footpath, Water Supply, Waste Water, Compact Growth, Public Transport, Co-Ordinated Development.

As noted in Table 5.1 the 31 no. identified sites in the SLA equate to 90.36 ha in total. KPMG FA have carried out a desktop review of the status of each of these sites. The sites which currently are associated with a granted planning application equate c. 40.7 ha with of total of 489 units permitted.

Of the total 31 no. sites zoned for residential development in the current plan a total of 18 no. sites show no visible development activity and have no extant permissions associated with them. This equates to a total of 49.7 ha of residential zoned land that has seen no activity since the commencement of the current plan. Over 50% of the sites identified in the SLA show no signs of coming forward. **If current trends of inactivity continue, the Draft Plan will not deliver upon its housing targets to meet population growth of 1,550 units and 2,705 people in Ennis.**

5.3 Comparison of Subject Site to Remaining Zoned Lands

While the SLA has identified sites deemed to be suitable for residential development, it is considered that based on their status since the commencement of the current plan, they are unlikely to be forthcoming for development in the short to medium term. In comparison, the subject site further benefits from its contained and coherent landholding owned by a single-party who is eager to progress with the redevelopment of the lands for residential use imminently. On this basis, it is considered that the subject site should not be prejudiced from being brought forward for development in the near term.

Of the sites identified via the SLA, 3 no. are located in close proximity to the subject site. These sites are LDR 1, R3 and LDR 10. The close proximity of these sites to the subject sites demonstrates the suitability of the subject site in terms of location. According to the Draft Plan (Appendix 1 Introduction SLA), the development of these sites would be considered as delivering compact growth in Ennis and so a similar appraisal of the subject lands should be adopted.

Table 5.2 below assesses the subject site against the criteria used in the Serviced Land Assessment. These included the roads and footpaths serving the site, the water services serving the site, the site ability to achieve compact growth, access to public transport and the sites ability to provide co-ordinated development. Responses are indicated based on the results for the site R and LDR sites located adjacent to the subject site.

Table 5.2 – Subject Site Assessed Against the SLA Criteria

Area (ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-ordinated development
7.15	1	1	1	1	✓	✓	✓

This assessment indicates that the subject site is just as suitable, if not more suitable than more than half of the sites identified in the SLA. The 18 no. of the 31 no. sites that were originally identified via the current development plan, that show no signs of coming forward in the short to medium term were presented with the same opportunity to deliver housing and have not. Furthermore, the fact that only 98 houses were built within the Study Area between 2011-2016³ is further evidence that the target increase for housing units within Ennis as outlined in the current Development Plan was 3,166 units between 2011 and 2023, will not be met. **If current trends of inactivity continue, the Draft Plan will not deliver upon its housing targets to meet population growth of 1,550 units and 2,705 people in Ennis.**

The subject site shares many of the characteristics of these sites, as demonstrated in Table 5.2 and is a position to deliver housing in the short to medium term. On this basis, it is our opinion that the subject site should be added to the list of residential zoned sites, by replacing an existing site on the list that shows no prospect of coming forward.

³ CSO, 2016

6 Concluding Comments

The subject site is presently zoned mainly as 'Agriculture', which some smaller areas of land zoned as 'Utilities' and 'Open Space' in the current *Clare County Development Plan 2017-2023*. The *Draft Clare County Development Plan 2023-2029* proposed to maintain the existing zoning for the subject site. **It is now proposed for the site to be rezoned as 'Residential'**.

6.1 Demographic Need

A review of the demographic profile of the area has demonstrated that there is an apparent need for housing in Ennis and that as a Key Town, Ennis has the capacity to absorb additional housing. In order to maintain Ennis' status as a regional driver in a sub-regional context it is imperative that future growth can be accommodated and that a sufficient supply of housing is delivered in a timely fashion.

As demonstrated in the socio-economic profile for the area, the Study Area has experienced growth in population over a 5 and 10 year period. The growth in population over the last 5 years was slightly higher than the increase at county level.

Population is projected to increase by 2,705 persons within the life of the Draft Plan. In order to meet this projected growth, the Core Strategy has allocated a planned housing target of 1,550 units for the settlement of Ennis. If recent historic trends of inactivity in housing delivery on residential zoned lands in Ennis are permitted to continue over the course of the new Plan, there is a realistic risk that the projected population growth will be unable to be accommodated within the settlement boundary. This in turn could jeopardise Ennis' status as a Key Town and hinder the ambitions for the consolidated and expanded growth of the town. The subject lands present a tangible opportunity to deliver upon local, regional and national aspirations for Ennis and ensure housing targets are achieved.

The review of the demographic profile has demonstrated that there is currently a need for housing which is compounded by an increase in population that has occurred over the last decade and a projected increase in population that is expected over the life of the development plan, and beyond.

The average rent price in Ennis for all unit types has significantly increased over a 10 year period by approximately 26%. This would indicate that there is currently pressure on the existing supply of rental properties, which in turn is driving up rental prices.

The settlement of Ennis is well served by social infrastructure, with 175 facilities identified within the settlement and a total of 34 no. facilities identified within 2 km of the subject site. New residential development would be supported by the wealth of community infrastructure already available in the settlement and the immediate context.

6.2 Grounding in Planning Policy

An increase in the delivery of housing in Ennis is directly supported by national, regional and local planning policy. It is considered that delivery of housing on the subject site would assist with the delivery of the following policy objectives:

- The NPF Implementation Road Map (2018) provides that Clare is projected to experience a population uplift of 10,500-12,500 persons between 2016-2026 and an uplift of 15,000-18,000 persons between 2016-2031. **As Clare's Key Town, Ennis will play a key role in meeting this target.**
- As outlined in Housing for All, there is national target of building an average of **33,000 new homes every year from 2021 to 2030**. Housing for All seeks to support homeownership and increase new housing supply.
- At a regional level, the RSES suggest that the southern region is likely to grow by 380,000 by 2040. Key Towns such as Ennis play a critical in ensuring the consolidated spread of growth beyond cities. **Key Towns are to be a focus for significant growth (more than 30%).**
- Ennis 2040 sets out the following estimates of capacity for Ennis: Inner area could deliver 45-50 units/ha, which would equate to an additional 1,350-1500 homes in the town centre by 2040; Intermediate area could deliver 30 units/ha, which would equate to an additional 3,500-4000 units by 2040; **and the Outer area (where the subject site is located) could deliver at least 15 units/ha, which would equate to an additional 700-800 units by 2040.**
- Delivery of much needed housing at this location would contribute to compact growth by providing housing in the existing built-up footprint of Ennis and would complement the '10 minute town' concept.

6.3 Sequential Development for Ennis

As noted in Section 5 above, of the 90.36 ha of land that has been identified for residential development since the adoption of the current development plan, a total of 49.7 ha of the this shows no signs of visible development activity and have no extant permissions associated with them.

While the SLA has identified sites deemed to be suitable for residential development, it is considered that, based on their status since the commencement of the current plan, they are unlikely to be forthcoming for development in the short to medium term. In comparison, the subject site further benefits from its contained and coherent landholding owned by a single-party and is ready to come forward for development. On this basis, it is considered that the subject site should not be prejudiced from coming forward in the near term and should therefore be zoned accordingly to facilitate residential development at an appropriate location.

The subject site has substantial development potential for a residential scheme. This assessment indicates that the subject site is just as suitable, if not more suitable than some of the sites identified in the SLA. The 18 no. sites that were originally identified via the current development plan, that show no signs of coming forward in the short the medium term have had opportunity deliver housing and have not. The subject site shares many of the characteristics of these sites, as demonstrated in Table 5.2 and is a position to deliver housing in the short to medium term. On this basis, it is our opinion that the subject site should added to the list of sites suitable for Residential sites.

6.4 Compatibility of Surrounding Uses

It is worth noting that while the subject site is greenfield in nature, the surrounding area comprises existing residential development, particularly to the west of the subject site. The subject lands present an opportunity to physically connect to an established residential community and represents a logical and coherent response to underutilised lands.

As identified in the social infrastructure audit in section 3.2.9, there were 34 no. facilities identified within 2 km of the subject site. These included educational facilities, health care facilities, convenience retail and sports and recreational facilities, such as Clarecastle GAA grounds to the south. The subject site is considered to be well served by social infrastructure.

The provision of residential development at this location would add to the existing cluster of compatible uses in this area.

6.5 Implementation and Delivery

The land owner of the subject site is committed to working with Clare County Council to deliver housing on this site. Following the rezoning of these lands, the land owner is prepared to commence engagement with the Planning Authority in terms of delivering a design solution that delivers on the objectives of national, regional and local policy. **With the above considered, it is respectfully requested that the zoning designation of the lands be changes from 'Agriculture', 'Utilities' and 'Open Space' to 'Residential'.**

This submission has presented a strong and robust case for the rezoning of the subject lands to 'Residential' on the grounds set out above. It should also be noted that the residential zoned lands contain permissible density bands that would ensure the Authority retain sufficient comfort in relation to the intensity of development proposals for the lands and this can be appropriately controlled at planning application stage. The default position should not be the reversion of lands to agriculture and should the Planning Authority feel that the site is more suited to 'Low Density Residential', it is strongly considered that this submission should not prejudice that outcome.

7 Appendix

Table 1 Facilities identified in Section 3.2.4

Facilities Audit	
Childcare	ABC Nursery
Childcare	Cairde Early Learning Centre
Childcare	Castlerock Montessori
Childcare	Clare Family Resource Centre
Childcare	Clare Haven Services Ltd.
Childcare	Clarecastle Community Playgroup
Childcare	Connolly Pre-School
Childcare	Deirdre McGrath
Childcare	Educare Montessori Centre
Childcare	Ennis Montessori School
Childcare	Holy Family Kids Club
Childcare	Kathy's Montessori and Childcare
Childcare	Lifford Childcare Centre
Childcare	Little Ducks Creche
Childcare	Little Einsteins Montessori Preschool
Childcare	Little Scholars Pre-school
Childcare	Majella Nolan
Childcare	Miss Grainnes Holy Family Montessori School
Childcare	Naionra Ceimeanna Beaga Teo
Childcare	Nurture Childcare and Early Learning Centre
Childcare	Realta Draiochta Pre-School (Ennis National Preschool)
Childcare	Redeemers Preschool
Childcare	Rockmount Montessori
Childcare	Room to Bloom Kids Care
Childcare	Stone Court Childcare Initiative/Cuddles Community Pre-School
Childcare	Teach Abhaile
Childcare	Tiny Tots Montessori
Postprimary	Coláiste Mhuire Ennis
Postprimary	Ennis Community College
Postprimary	Rice College Ennis
Postprimary	St Flannan'S College
Primary	An Daingin National School

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Primary	CBS. Bunscoil Na Mbraithre
Primary	Chriost Ri Ns Ennis
Primary	Clarecastle National School
Primary	Ennis Educate Together Ns
Primary	Ennis N S
Primary	Gael Scmhichil Inis
Primary	Holy Family Junior School
Primary	Holy Family Snr
Special Needs	St Annes Special School
Special Needs	St Clares Special School
Gol Course	Ennis Golf Club
Park	Claureen Community Orchard
Park	Kincora Park
Park	People's Park
Pitch	6-a-side Soccer Pitch
Pitch	Clare GAA county Board pitch
Pitch	Coláiste Mhuire multiuse pitch
Pitch	College road Pitch
Pitch	Ennis Skatepark
Pitch	Glenina Pitch
Pitch	John O'Sullivan Park Pitches
Pitch	Lifford Pitch
Pitch	Marian Athletic Club
Pitch	Pearse Avenue All Weather Pitch
Playground	Clarecastle Playground
Playground	Cloughleigh Community Centre playground
Playground	Coote Park Playground
Playground	Funkidz Klub
Playground	Lifford Road Playground
Playground	New Rd Playground
Sports Facility	Active Ennis Leisure Complex
Sports Facility	Active Ennis Pool
Sports Facility	CrossFit Ennis
Sports Facility	Educogym
Sports Facility	Ennis Gymnastics Club
Sports Facility	Fitness Solutions Studio
Sports Facility	Heart Health and Fitness
Sports Facility	Hustle Fitnes Gym
Sports Facility	Ozone Health & Fitness
Sports Facility	Spartan Fitness Ennis
Sports Facility	Vr Fitness

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Sports Facility	West County Leisure Club
Sports Ground	Clarecastle G.A.A & Pitches
Sports Ground	Coote Park Football Pitch
Sports Ground	Éire Óg Inís GAA Academy
Sports Ground	Ennis Rugby Football Club & Pitches
Sports Ground	Lifford FC Cassidy Park
Sports Centre	Clare Camogie Board : Fr McNamara Park
Sports Centre	Coláiste Mhuire sports facility
Sports Centre	Ennis Lawn Tennis and Badminton Club
Sports Centre	St Flannan'S College sports facility
Sports Centre	TC Fitness & Self Defence Centre
Stadium	Cusack Park
Track	John O'Sullivan Park Track
Track	Lifford Track
Community Centre	Cloughleigh Community Centre
Community Centre	Ennis Community Centre
Courthouse	Ennis Court House
Fire Station	Ennis Fire Station
Library	Clare County Library Local Studies Centre
Library	County Library
Library	De Valera Public Library and Gallery
Museum	Clare County Museum
Museum	Clare Museum
Police	Ennis Garda Station
Post Office	Bank Place Post Office
Post Office	Clarecastle Post Office
Post Office	Ennis Post Office
Post Office	Station Road Post Office
Theatre	Glór
Supermarket	ALDI
Supermarket	Centra
Supermarket	Dunnes Stores
Supermarket	Kavanagh's Spar
Supermarket	Liddy's
Supermarket	Lidl
Supermarket	Tesco
General Practitioner	Ardlea Medical Practice
General Practitioner	Buglers Medical Practice

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General Practitioner	Doctors365
General Practitioner	Dr. Colum Gavin
General Practitioner	Ennis Family Medical Centre
General Practitioner	Ennis Medical Centre
General Practitioner	Fergus Medical Centre
General Practitioner	Francis Street Medical Centre
General Practitioner	O'Connell's Medical Hall
General Practitioner	Roslevan Medical Practice
General Practitioner	Saffron & Blue Medical Centre
General Practitioner	The Abbey Medical Centre
General Practitioner	The Elm Medical Centre
Health Centres	Clarecastle Health Centre
Health Centres	County Clinic
Health Centres	Museum House
Health Centres	St. Josephs Hospital
Hospital	Cahercalla
Hospital	Ennis Hospital
Mental Health	Cappahard Lodge
Mental Health	Clara Slattery
Mental Health	Clare Flynn Counselling Services
Mental Health	Clement Counselling & Psychotherapy
Mental Health	Ennis Counselling
Mental Health	Ennis Day Hospital
Mental Health	Ennis Therapy Centre
Mental Health	Spectrum Counselling and Supervision
Mental Health	Teach de Paor
Nursing homes	Cappahard Lodge Nursing Home
Nursing homes	District Daycare Centre
Nursing homes	Ennis Nursing Home
Nursing homes	St. Josephs Hospital
Pharmacies	Boots
Pharmacies	C&F Pharmacy
Pharmacies	Clarecastle Pharmacy
Pharmacies	Fennell's Pharmacy
Pharmacies	Fennell's Pharmacy Clare Abbey

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Pharmacies	Flynn's Life Pharmacy
Pharmacies	Haven Pharmacy Holly's
Pharmacies	Mary Jo Duffy Pharmacy
Pharmacies	McLoughlin's Pharmacy
Pharmacies	Murphy's Pharmacy
Pharmacies	Normoyle's Allcare Pharmacy
Pharmacies	O'Connell's Medical Hall
Pharmacies	O'Sullivan's Pharmacy (Bank Pi)
Pharmacies	O'Sullivan's Pharmacy (O'Connell Street)
Pharmacies	Pharmacy Department, UL Hospitals, Ennis Hospital
Pharmacies	Rochford's Pharmacy (Parnell St)
Pharmacies	Rochford's Pharmacy (Westgate Business Park)
Pharmacies	Rochford's Pharmacy (Francis St)
Burial Site	Clarehill Burial
Burial Site	Drumcliffe Cemetery
Burial Site	Templemaley Graveyard
Place of Worship	Chapel
Place of Worship	Christ the King Church
Place of Worship	Clarecastle Church
Place of Worship	Ennis Cathedral
Place of Worship	Ennis Evangelical Church
Place of Worship	Franciscan Friary
Place of Worship	Our Lady
Place of Worship	Saint Columba's Church
Place of Worship	Saint Joseph's Church

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