

SUBMISSION TO DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Parcels F Lands at Ashline, Kilrush Road, Ennis

Harnett Homes & Estate Developers Limited

Issue: A

Customer Project Number: 4951

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Document Sign Off

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| CURRENT ISSUE | | | | | | |
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| Issue No: A | Date: 26.03.22 | Reason for issue: Submission to Draft Clare County Development Plan 2023-2029 | | | | |
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| Print Name | Mandy Coleman | Paddy Coleman | | Mandy Coleman | | |
| Signature | Authorised Electronically | | | | | |
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| PREVIOUS ISSUES | | | | | | | |
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1.0 INTRODUCTION

P. Coleman & Associates, Architects, Engineers and Planners have been appointed by Harnett Homes and Estate Developers Limited to prepare a submission to the Draft Clare County Development Plan 2023-2029 (Draft Plan) with specific reference to the land-use zoning proposed for Ennis town. Our Client is seeking to change the proposed 'Community' zoning on the subject site marked F to 'Commercial'.

The submission will be outlined as follows:-

Section 2: Subject Site

This section provides a description of the site and its context.

Section 3: Planning Policy Framework

This section outlines the proposed national and regional planning policies guiding the Draft Plan and current zoning for the subject site.

Section 4: Zoning Objective of the Draft Plan

This section outlines the proposed land use zoning for the subject site as defined in the Draft Plan.

Section 5: Requested Amendments

This section sets out the case for the change of the proposed 'Community' zoning objective to 'Commercial'

Section 6: Conclusion

This section provides a summary of this submission.

2. SUBJECT SITE

2.1 The Site

The subject site is outlined in red in Figures 1 and 2 below and identified as Parcel F. The subject site is located in the townland of Cahircalla More, Ashline on the western side of Ennis town. The subject land forms part of a larger landholding owned by our Client which was split by the development of the N85 Western Relief Road

Parcel F is located on the eastern side of the new access road serving the Ennis National School at Ashline. The subject site has extensive road frontage onto the access road to the school and onto the N68 which forms its full southern boundary. The northern boundary is bound by a green route/access laneway from the Kilrush road to the access road servicing the Ennis National School. The subject site is relatively flat and contains some mature trees. The subject site is considered exceptional in terms of location and also in terms of topography. The subject site has great potential and is an opportunity site to provide for a landmark building.

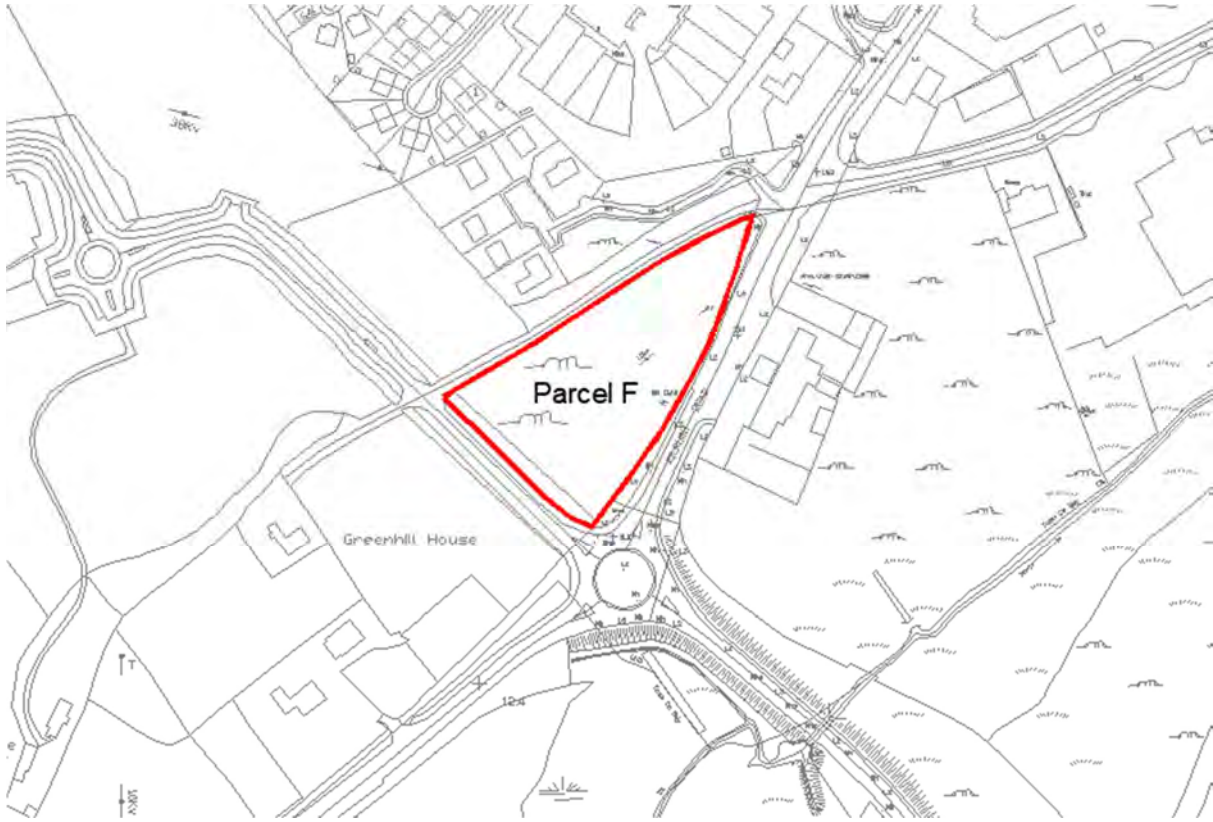


Figure 1 – Site Location Map – Subject Site outlined in Red - identified as Parcel F



Figure 2 – Aerial Image of Subject Site outlined in red - identified as Parcel F



2.2 Site Context

The subject site benefits from good access to national and secondary schools and amenities all of which are within easy walking distance. The subject site is connected to the town of Ennis by footpath.

There are a number of commercial businesses sites adjacent to the subject site including Westpoint Retail Park, Westgate business Park and O'Sullivan and Hansbury commercial development. The Outpatients department for Ennis General Hospital operates from Westpoint Retail Park.

3.0 PLANNING CONTEXT

The following section outlines the key national and regional planning policies which support the proposed amendment to the proposed zoning for the site and the current local level planning polices for the commercial zoning of the subject site.

3.1 National Planning Context

3.1.1 National Planning Framework

The National Planning Framework (NPF) entitled 'Ireland 2040' is a framework to guide public and private development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy.

A key focus of the NPF is the need for compact growth. National Strategic Outcome 1 Compact Growth states

"From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people. Combined with a focus on infill development, integrated transport and promoting regeneration and revitalisation of urban areas, pursuing a compact growth policy at national, regional and local level will secure a more sustainable future for our settlements and for our communities.....".

The various polices in the NPF are structured under National Policy Objectives (NPOs). The key NPO's of relevance to this submission are as follows:-

NPO3a seeks to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

NPO3c is to 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;



NPO6 Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

NPO11 in meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

NPO35 relating to increased residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Other relevant sections include Section 2.6 Securing Compact and Sustainable Growth which states

“An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village, has the potential to make a transformational difference. It can bring new life and footfall, contribute to the viability of services, shops and public transport, increase housing supply and enable more people to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less”.

3.2 Regional Planning Context

The Southern Regional Assembly published the ‘*Regional Spatial and Economic Strategy for the Southern Region*’ (RSES) on 31st. January, 2020. It is a 12-year, strategy development framework providing for the future physical, economic, and social development of the Southern Region. It includes Metropolitan Area Strategic Plans (MASPs) to guide the future development of the Regions three main cities and metropolitan areas, Cork, Limerick-Shannon and Waterford and strategies for Key Towns including Ennis Town. It seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – NPF.

Fourteen ‘*Key Town*’s, including Ennis, are identified in the RSES. They each play a critical roll in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities of the sub-regional level.

Six of the Key Towns have a very significant population scale, Kilkenny City, Ennis, Carlow, Tralee, Wexford and Clonmel. The RSES states:-



'These Key Towns are self-sustaining regional drivers and have a comparable structure to the five regional growth centres identified in the NPF. Given their considerable scope for growth, it is envisaged that local authorities should plan for population growth of more than 30% by 2040'

Accordingly, Regional Policy Objective 11 refers growth in the Key Towns, including Ennis, as follows:-

'a. Local Authorities are supported in targeting growth of more than 30% for each Key Town subject to capacity analysis and sustainable criteria under Section 3.3 A Tailored Approach, RPO 3 Local Authority Core Strategies and the sustainable requirements under the following sub sections of RPO 11 Key Towns The appropriate level of growth is to be determined by the Core Strategy of Development Plans'.

3.3 Local Planning Context

The subject site is located within the functional area of Clare County Council and the relevant policy document is the Clare County Development Plan 2017-2023 (CCDP).

According to the Settlement Strategy, the Settlement Plan Policy Objective for Ennis is to ensure that Ennis, designed as a Hub town in the National Spatial Strategy (now superseded) as the county town at the top of the settlement hierarchy;

- a) is a driver of economic and regional prosperity by harnessing its strategic location strong urban structure, retail service and accommodation base as well as its competitive advantages,
- b) a vibrant culturally rich town with a revitalised town centre strong economic growth balanced with enhanced social inclusion sustainable neighbourhoods and a high level of environmental quality ensuring an excellent quality of life is achieved and
- c) a local area plan for Ennis and its Environs during the lifetime of the CCDP.

The Core Strategy illustrates how the vision for the County will be achieved in a manner that is consistent with the guidance, strategies and policies at national and regional level. The Core Strategy includes a settlement hierarchy (Table 2.1). Ennis town, with a population of approximately 25,000, is the largest settlement in County Clare. It is an important residential, service and commercial centre providing significant levels of employment. It is therefore at the top of the Settlement Hierarchy for the County. See Figure 5 below.



Figure 3 – CCDP Core Strategy Map
Source - CCDP

Table 2.4 of the CCDP refers to the Core Strategy Population Targets. It identifies that Ennis has a target population increase over the plan period of 8,137 people and a target increase in the number of households of 3,166. 137.2ha is the total area of residentially zoned land required to 2023 based on a density of 30 units/ha. for residentially zoned land in Ennis.

3.3.1 Zoning

Parcel F is currently zoned as ‘Community’ in the Ennis Municipal District Plan - Volume 3a of the CCDP.

The ‘Community’ use zoning objective states as follows:-

“The use of land zoned for commercial uses shall be taken to include the use of lands for commercial, civic, health services, public or educational uses including the provision of schools, community halls, healthcare facilities and any other facility that is intended to provide some form of community service. A service may be delivered by either public, community or private body”.

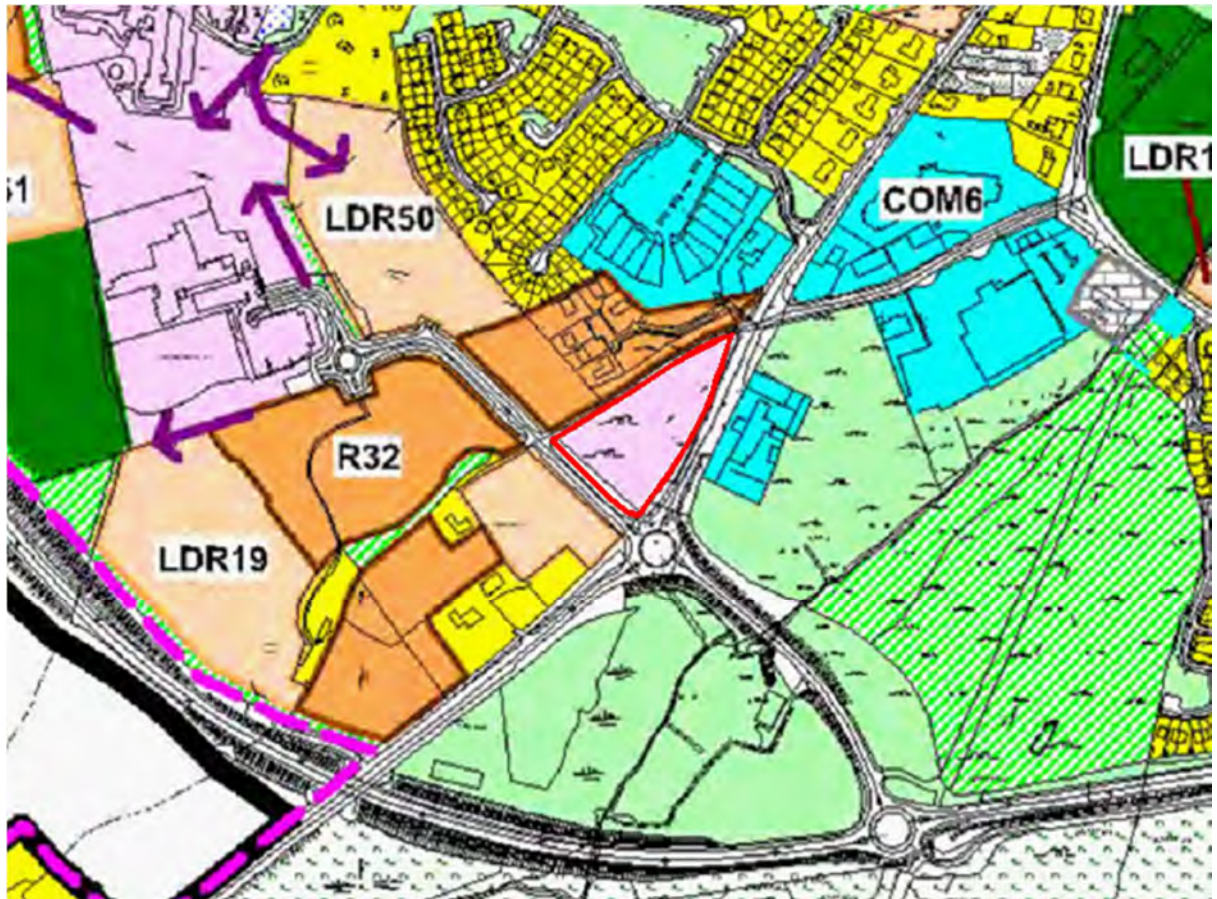


Figure 4 – Current Land Use Zoning Map - Clare County Development Plan 2017-2023.

4.0 DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

The Draft Plan proposes to no change the existing 'Community' zoning objective on the subject site - See Figure 5 below.

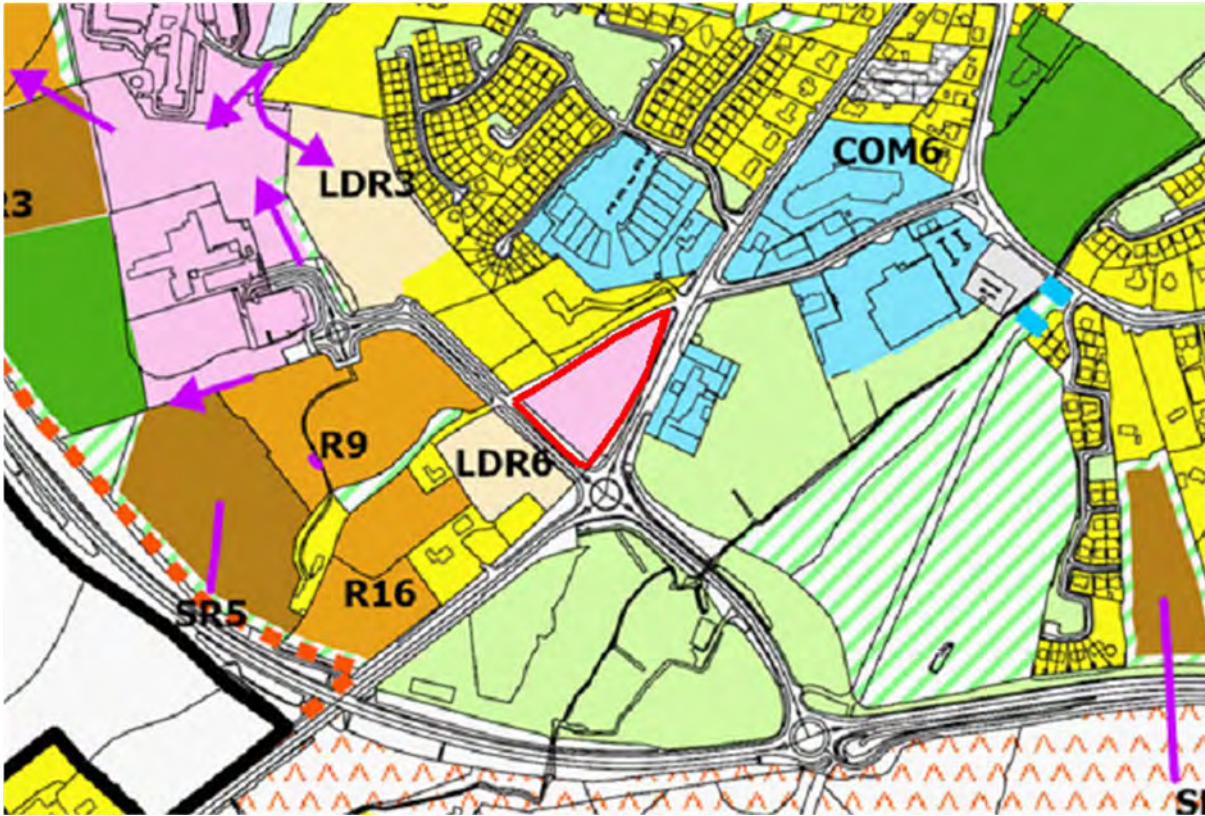


Figure 5 – Proposed zoning map Draft Clare County Development Plan 2023-2029.

The rationale for changing the zoning to *Commercial* within the subject site is set out in Section 5 below.

5.0 REQUESTED AMENDMENT

5.1 Change *Community* zoning to *Commercial* Zoning

It is requested that the *Community* zoning objective on the subject site be changed to *Commercial* as identified in Figure 6 below.

There are a number of material considerations put forward for consideration by our Client which, it is submitted, will need to be considered by the Planning Authority, including the pattern of development in the area; the strategic location of the site, the need for compact and sustainable growth; sequential approach to development and environmental considerations the existence of infrastructure such as water supply, sewers, electricity, fibre cable, roads and amenities.

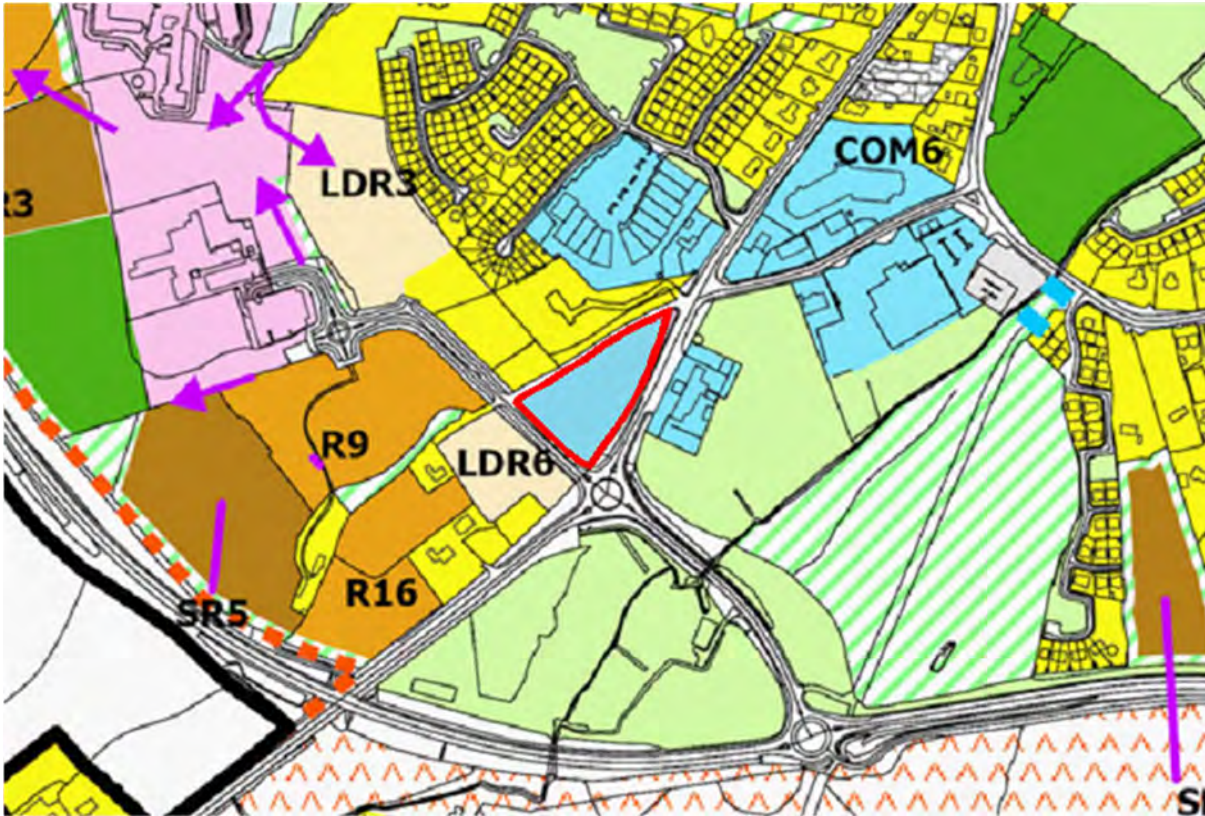


Figure 6 – Request for zoning amendment – Change ‘Community’ to ‘Commercial’ zoning.

5.2 Principle of Commercial Development.

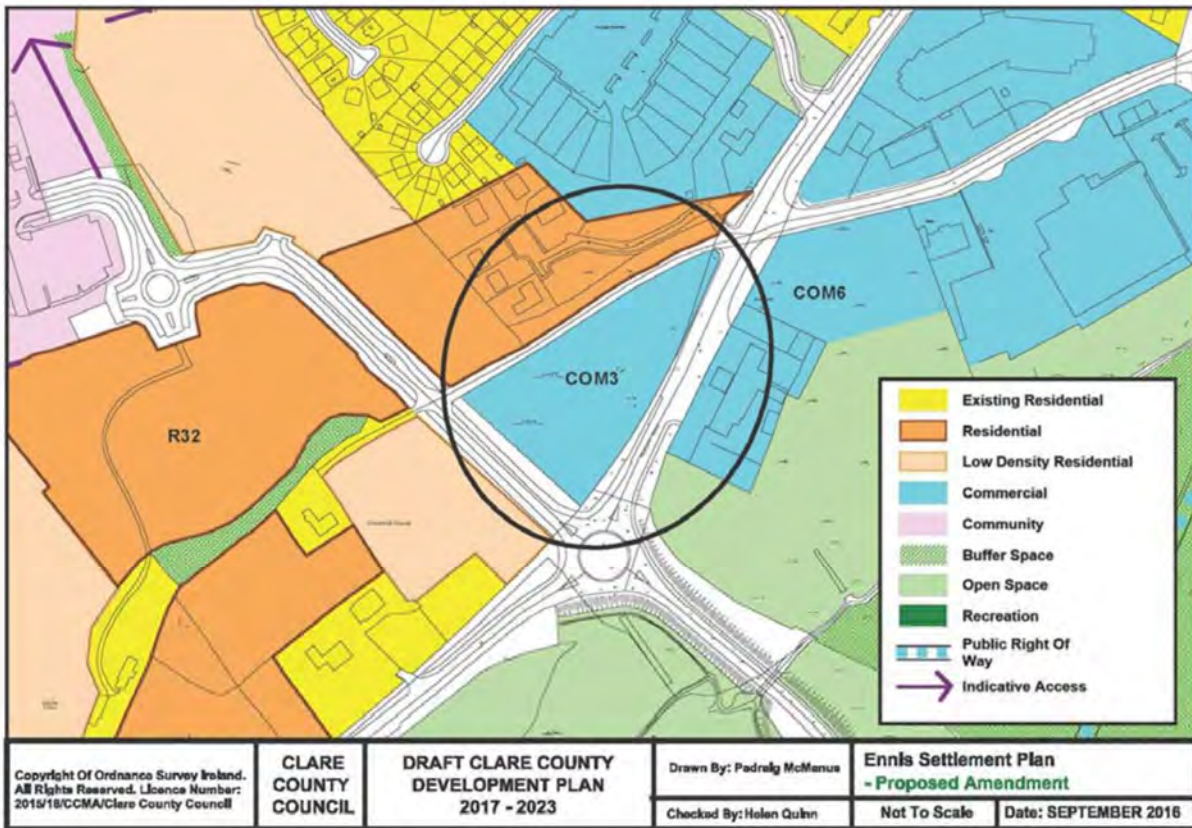
As part of the current CCDP process, our Client made a similar zoning request to the Draft CCDP 2017-2023. The proposed amendments to the Draft CCDP 2017-2023 accepted our Clients request and proposed to change the ‘Community’ zoning on the subject site to ‘Commercial’ with a specific zoning objective of ‘COM3’. See figure 7 below. The ‘COM3’ zoning objective stated as follows:-

“Site COM3 Lands at Kilrush Road Roundabout

This site has been zoned for Commercial purposes. Future development proposals must provide for the development of a landmark building that will form a strong and attractive focal point on this approach to the town.

Development proposals on this site shall include the provision of a playground to serve the surrounding community. The playground shall provide play equipment/facilities for a variety of age groups and the layout of the overall site must ensure that the playground is conveniently located and overlooked. Safe pedestrian, cyclist and vehicular access to the play facilities must be provided.

Development proposals for this site must be accompanied by a transport and traffic assessment undertaken in accordance with NRA/TII Traffic and Transport Assessment Guidelines (2014). This must also include an assessment of the cumulative impact of traffic/transport generated by planned development in area on significant junctions in the vicinity”.



Map 7 Proposed “COM3 Commercial” zoning on Parcel F

Source: Draft Clare County Development Plan 2017-2023 Proposed Amendments September, 2016

Our Client accepted this zoning and sought for it to be adopted through a written submission on the Proposed Amendments to the CCDP 2013-2017. Unfortunately, this zoning change was not carried forward to the Adopted CCDP and the final zoning adopted on the subject site was ‘Community’.

Our Client is not aware as to why the proposed ‘Commercial’ zoning was not adopted in the CCDP.

Our Client had proposals prepared a few years ago for a boutique style hotel on the subject site. A boutique style hotel would also be highly desirable that this location given the range of existing and proposed uses. The subject site is also highly accessible from the roadway network ‘Commercial’ could facilitate a proposal for this use. We note the following from the Draft Plan which would support the provision of a Hotel on the subject site.



Section 1.11.1 – Strategic Aims of Tourism states that:-

In order to support the achievement of a successful, diverse and year-round tourism industry in the settlement area, the following strategic aims will be pursued:-

- *To protect, enhance and expand the established tourist economy in Ennis in a sustainable manner;*
- *To support the development of a **hotel and conference centre within the Town;***
- *To promote Ennis as a destination and integral part of the wider tourist product in County Clare;*
- ***To encourage, facilitate and promote the development of an international brand hotel and convention facility in Ennis;***
- *To pursue Ennis as a hub for cycleways, greenways and eco-tourism; and*
- *To support the Ennis Niche Destination Plan. (Emphasis Added)*

Policy Objective CDP9.7 – Business Tourism states as follows:-

“It is an objective of Clare County Council:

- a) To promote, encourage and facilitate the provision of new conference facilities and the expansion/upgrade of existing conference facilities throughout the County at appropriate locations and in full compliance with all relevant environmental legislation in particular the requirements of the Habitats Directive;*
- b) To support the work of the Shannon Region Conference and Sports Bureau;*
- c) To encourage the development of a new internationally branded hotel and convention facility in Ennis to enhance the tourism product; and*
- d) To support and encourage the marketing of County Clare as a conference location at national and international levels (Emphasis Added)*

Ennis Settlement Plan Objective V3(a)11 states as follows:-

it is an objective of Clare County Council:

- a) To encourage and facilitate the development of a diverse, high quality tourism accommodation base in Ennis; and*
- b) To encourage a new internationally-branded hotel and convention facility in Ennis to enhance the tourist product. (Emphasis Added)***

It is submitted that the subject site would be ideally suited to provide for the principle of a hotel and conference centre in compliance with the above Draft Plan Policy objectives

5.4 Planning for Compact Growth

The NPF seeks to achieve more compact and sustainable growth through consolidation, a greater share of future development within the existing built footprint of settlements, to include new homes, businesses and amenities. The NPF sets national targets for brownfield/infill housing development in settlements (30%) to support the regeneration of existing urban areas. NPF compact growth objectives together with Town Centres first principals are focused on the reuse of previously developed buildings and land and building up ‘infill’ sites, especially those that are centrally located in settlements at all scales.

In accordance with at ‘Methodology for a Tiered Approach to Landuse Zoning’ as set out in the Draft Plan, the subject site can be classified as potential Tier 1 Zoned Land. This means that the site has all the infrastructure necessary to ensure that residential development can be applied for and constructed in the short term. Refer to Figure 8 below which shows the subject site well served in terms of infrastructure including road and footpath access, lighting, drainage connectivity and water supply all available and all of which have capacity to accommodate development thus facilitating utilization of serviced land within the existing settlement boundary without the need for settlement expansion.

| Utility | Availability | Distance from Site |
|------------------------------|--------------|--------------------|
| Surface Water | Yes | Onsite Disposal |
| Wastewater | Yes | Abutting Site |
| Broadband (Wired & Wireless) | Yes | Available |
| Electricity | Yes | Abutting Site |
| Water | Yes | Abutting Site |
| Public Lighting | Yes | Abutting Site |
| Footpath | Yes | Abutting Site |

Figure 8 – Existing Infrastructure at the subject site.

5.5 Sequential Approach to Development

The NPF strategy incorporates National Strategic Objectives which seek to tackle the damaging and inefficient pattern of urban sprawl through favouring compact forms of development that focus on consolidating the footprint of our existing settlements with new development. The location of zoned lands and sites within the settlement must be consistent with sequential development patterns, town centre first principles, proximity to services and facilities and the need to reduce carbon emissions.

SPPR DPG 7 of the Draft Development Plan Guidelines state that,

“Planning authorities shall adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritized for development first, with more spatially peripherally located development sites being zoned subsequently”.



The subject site is strategically located with direct access to N68, Ennis to Kilrush Road, and in immediate proximity to the Western Relief Road (N85) and the adjoining distributor road, footpaths and cycle paths to the Ennis National School. The subject site is an available piece of land which fulfils the sequential approach as outlined in the NPF.

5.6 Need for new ‘Community’ zoned lands

There is an amount of lands zoned for ‘Community’ use directly adjacent to the Ennis National school and Cahercalla Hospital. In addition, the subject site is within close proximity to a substantial amount of lands zoned for ‘Community’ use on the St. Flannan’s property. The zoning of this landmark site for additional ‘Community’ use would not be required in our Clients opinion and would result in a proliferation of ‘Community’ use in this area.

6.0 CONCLUSION

On behalf of our Client we request that the current zoning ‘Community’ zoning on the subject site be changed to ‘Commercial’. The subject site is not reliant on the provision of major new infrastructure and, being in single ownership, is free from complex legal ownership arrangements involving multiple parties that will delay other sites being progressed for development.

In principle, commercial use on the subject site can be considered acceptable and should be encouraged in view of the strategic policy for Ennis as the County town at the top of the county’s settlement hierarchy and a “Key Town” which is within the Limerick-Shannon-Ennis triangle, the economic engine of the Mid West.

It is submitted that the provision of a ‘Commercial’ zoning objective on the subject site is therefore in accordance with the requirements of national, regional and local Policy.

On behalf of our Client, we request that this zoning request be adopted in the Clare County Development Plan 2023-2029.