



Draft Clare County Development Plan Submission

Tulla Road, Ennis





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1.

EXECUTIVE SUMMARY

We note that Clare County Council are in the review process of the existing Clare County Development Plan 2017-2023 and the preparation of a new development plan for the period 2023-2029 is underway. On behalf of our client, Mr. James Carolan, we wish to make a submission regarding Stage 2 (Draft) of the Clare County Development Plan 2023-2029 (hereinafter referred to as the Draft Plan) which was published on the 24th of January 2022 and will be on public display until the 28th of March 2022. Our client is the owner of lands at Tulla Road, Ennis. Co. Clare as indicated on Map 01 attached.

The subject lands are located at Tulla Road, in Ennis. The site is within the Ennis and Environs Local Area Plan Boundary. The lands are zoned for *Low Density Residential*, *Open Space* and *Agriculture* use in the Clare County Development Plan 207-2023. Clare County Council proposes to re-zone the lands zoned *Low Density Residential* to *Strategic Residential Reserve (SR2)* in the Draft Clare County Development Plan.

The subject lands are an infill site for existing residential development in the area, therefore the principle of residential development for the area has been accepted by Clare County Council .

It is considered that a change of zoning from Agriculture, Open Space and Strategic Residential Reserve to Residential or indeed Strategic Residential Reserve for the remaining lands is warranted and in accordance with proper planning and sustainable development of the area.

2. INTRODUCTION

2.1 Site Location

The subject lands are located north of the Tulla Road and to the west of the M18.

The locality is largely comprised of residential development including Lios Ard, Rathban and Gort na mBlath to the west, single dwellings to the south west on the Tulla Road and the Knockanean Traveller Accommodation to the south east.

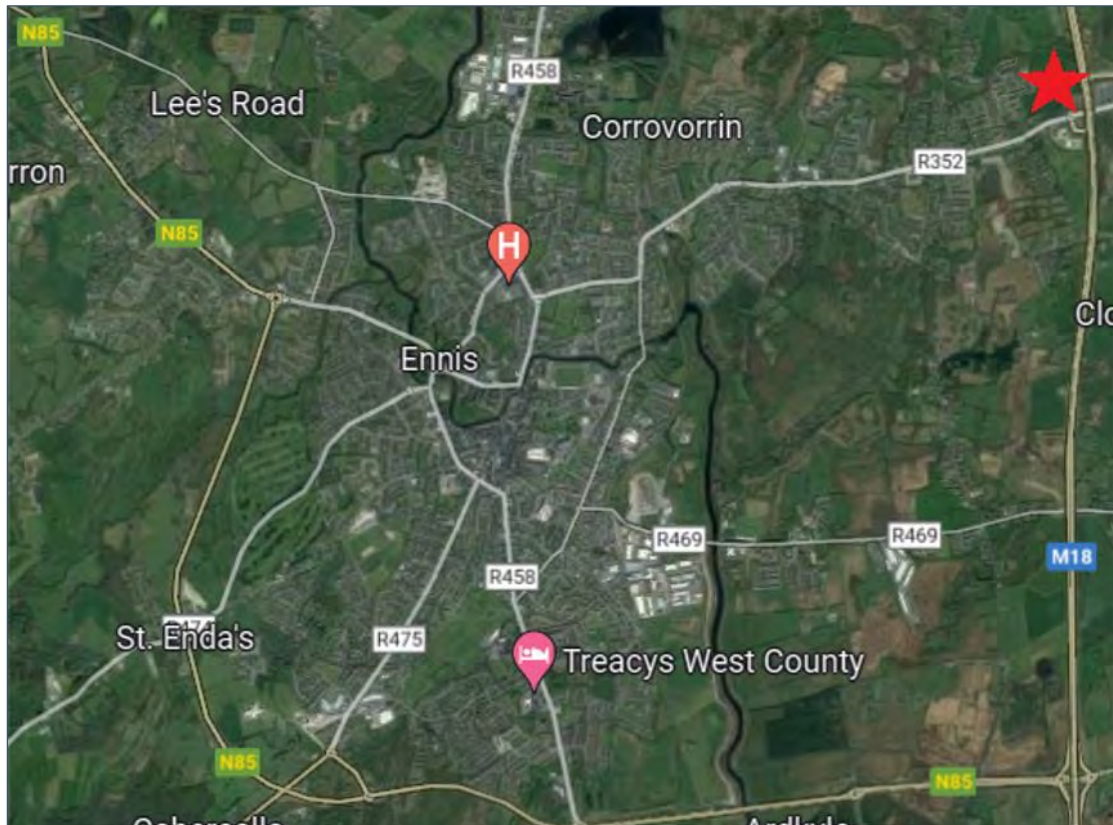


Figure 1 Location of the Subject Lands in Ennis marked with a Red Star (Source: Google Maps, Edited by MKO)

2.2 Site Description

The subject site measures approximately 9.6 Hectares (24 Acres). The site is greenfield in nature and currently not in use. The site currently consists of overgrown scrub and trees. The boundaries include a wooden fence and a brick wall. To the west the boundary is formed by the rear gardens of residential units on the Lios Ard and Rathban and the southern boundary is a gate separating the site from the existing footpath on the Tulla Road. In terms of wastewater treatment, the Ennis area is served by treatment plans at Clonroadmore and Clareabbey. Irish Water is progressing works to ensure that wastewater services are available to meet the population targets. It is stated in the Clare County Development Plan 2017-2023 that *'the existing Clareabbey WWTP will have sufficient capacity to cater for the current load from the area along with some added capacity.'*

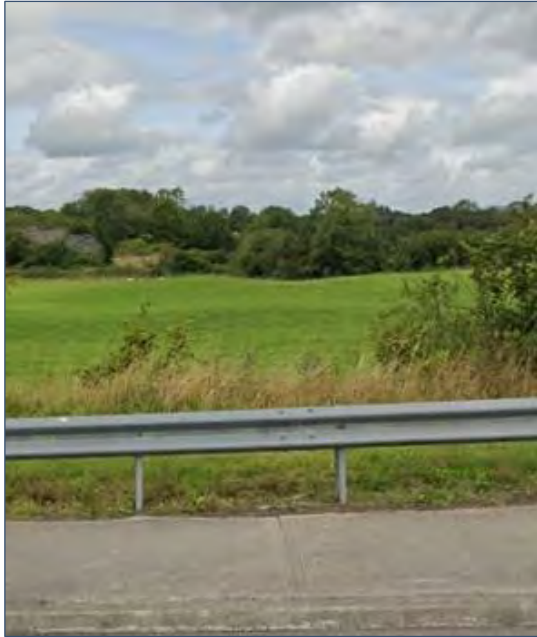


Figure 4 View of the subject lands boundary from the R352



Figure 2 View of the subject lands boundary from the M18



Figure 3 Location of the Subject Site marked with Indicative Red Line (Source: MyPlan, Edited by MKO)

2.3 Current Zoning

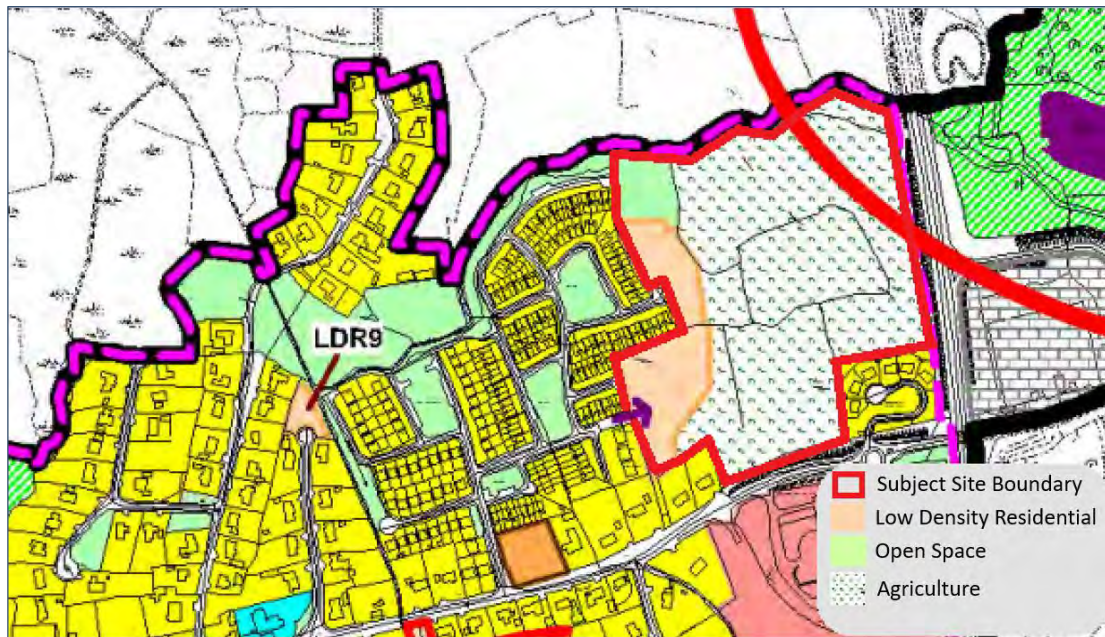


Figure 5 Current Zoning of Subject Site Source: Clare County Development Plan 2017-2023 Edited by MKO

In the current Clare County Development Plan 2017-2023 the subject lands are zoned for Open Space, Low Density Residential and Agriculture as evident in Figure 5.

2.4 Planning History

A review of the Clare County Council online planning permission application mapping system indicates that there has been one prior planning application on the subject lands.

Pl. Ref. No	Applicant	Description	Decision
061131	Reddington Construction Company Limited	To construct a housing development consisting of 99 no. dwellinghouses of various house types including associated site development works and connection of services to existing public services	Refused (06/07/2006)

2.5 Site Constraints

The northern part of the site has a small area of medium probability of river flooding; however, the site is within the boundary of an existing Ennis (Upper) Flood Relief Scheme which is *“expected to provide protection against a 100-year flood (1% Annual Exceedance Probability).”*

There are no protected structures or archaeological monuments located within the subject site. The nearest recorded monument to the subject site is Record No. CL034-051 which comprises a Ringfort-Cashel to the west of the site in the existing residential development.

The site is not located within or immediately adjacent to any EU or nationally designates sites.

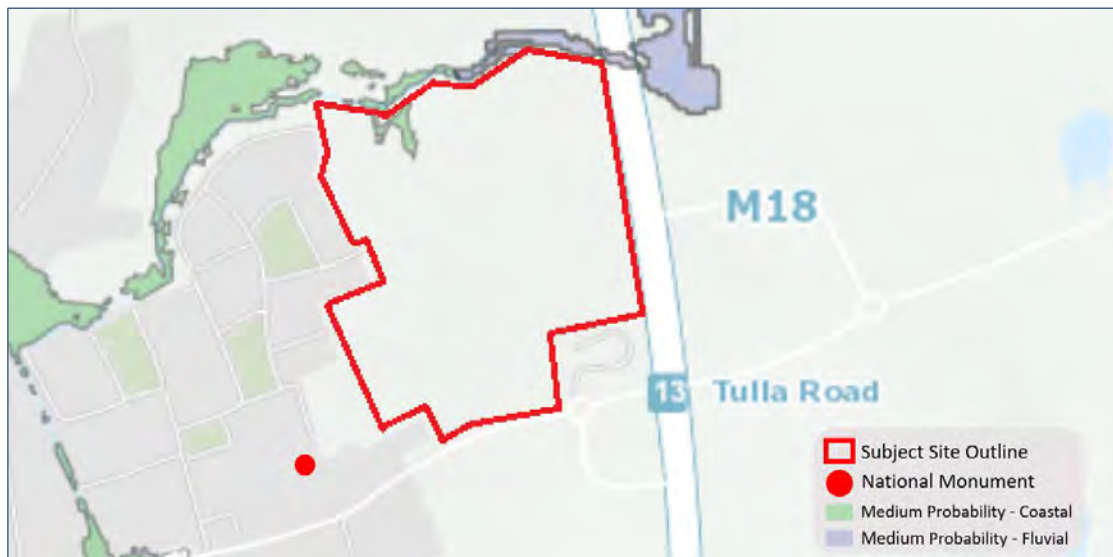


Figure 6 Flood Map (Subject Lands outlined in Indicative Red Line) Source: Floodinfo.ie Edited by MKO

3.

PROPOSED DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

The Development Plan Review for Clare County Council is currently in Stage 2. Draft Clare County Development Plan 2023-2029, published on 10th December 2021, will be on public display and open for consultation up until Monday 28th March 2022. Once adopted, it will replace the current Clare County Development Plan 2017-2023.

Section 1.4.1 titled *Strategic Aims for Housing and Sustainable Neighbourhoods* in the Draft Clare County Development Plan 2023-2029 states that ‘*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.*’

Another aim for Ennis is ‘*to promote the development of residential serviced lands to provide a for a high quality urban development 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 facilities, to serve the current and future residential population of Ennis;*’

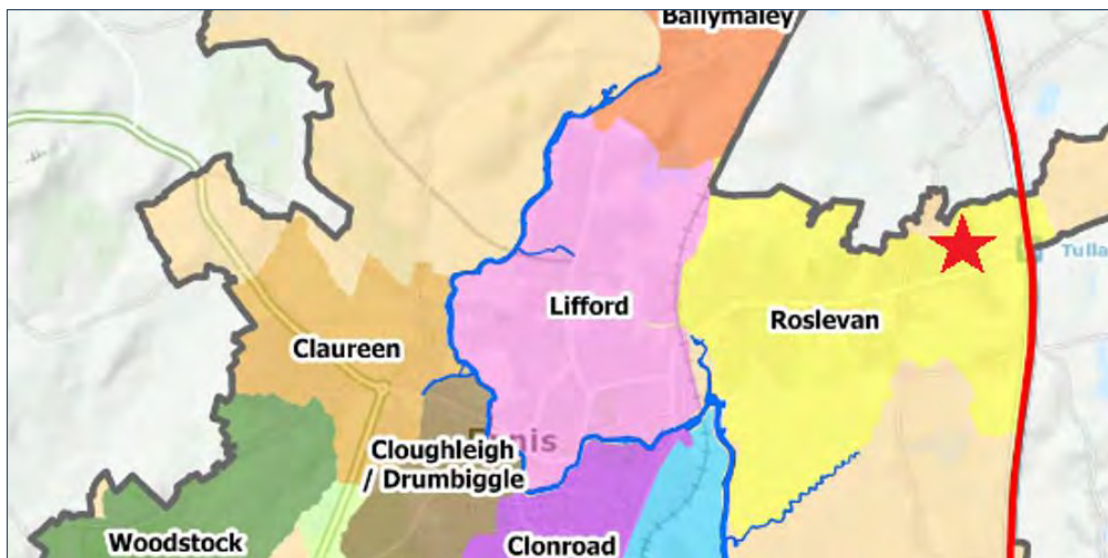


Figure 7 Map showing the neighbourhoods in Ennis (Subject Site marked with Red Star) Source: Draft County Clare Development Plan 2023-2029

The subject land is located within the dedicated lands for the Roslevan neighbourhood, see Figure 7. Volume 3a Ennis Municipal District Settlement Plan of The Draft Clare County Development Plan 2023-2029 outlines the following for Roslevan neighbourhood -

2.3.1 New Housing in the Roslevan Neighbourhood - *“Recognising the existing availability of neighbourhood services, existing and planned road infrastructure and the potential of Roslevan, lands have been zoned to accommodate the expansion of this neighbourhood in the future. A number of areas of land have been zoned in the Roslevan neighbourhood to accommodate residential growth. The proposed residential development lands are in close proximity to existing housing, shopping facilities, church and a community centre which will assist in the consolidation and appropriate expansion of the neighbourhood. Delivery of community facilities, school capacity and services should go hand in hand with the housing developments in this neighbourhood”*

The Ennis Municipal District Settlement Plan presents an overall strategy which states that to achieve population growth, ‘it is a requirement that at least 30% of all new homes that are targeted for Ennis are delivered within the existing built-up footprint’.

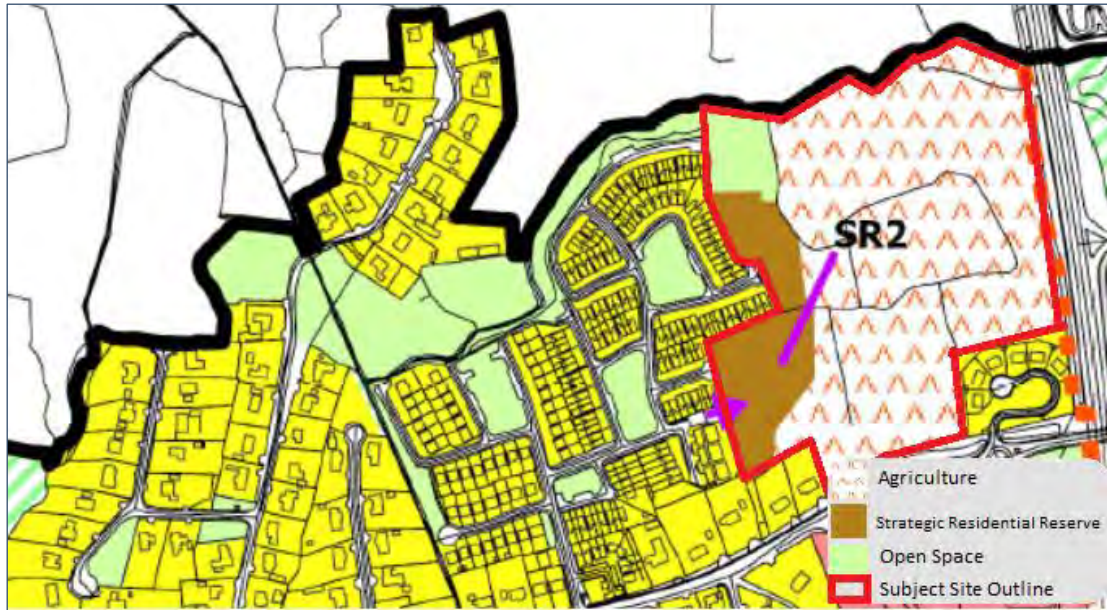


Figure 8 Zoning Map Source: Draft Clare County Development Plan 2023-2029 Edited by MKO

The subject site which is proposed to be zoned SR2 (Strategic Residential Reserve) is situated adjacent to a cluster of existing residential dwellings as evident from the Zoning Map in the Draft Plan (see Figure 8). Residential Development on the proposed site will be promoting compact and sequential growth as suggested in the overall strategy for Ennis. Draft Clare County Development Plan 2023-2029 describes the mentioned zonings as –

Agriculture - This zone is for the use of land for agricultural purposes and farming-related activities and to preserve the amenity of the town or village setting. Individual dwellings for permanent occupancy of established landowners(i.e. within family ownership for the preceding 10 years) and their immediate family members will be open for consideration subject to normal site suitability considerations.

Open Space - It is intended that lands zoned ‘open space’ will be retained as undeveloped open space, mainly for passive open space related activities. The open space/park areas could contain active play facilities such as children’s play areas but these should only be a small component of the overall areas involved.

It must be noted that over the lifetime of the Clare County Development Plan 2017-2023, the subject lands were never used as Open Space or for any passive open space related activities. Furthermore, Ennis, and the immediate surrounding area is well served by several pockets of Open Space zoning.

Strategic Residential Reserve - It is acknowledged that not all lands within the settlement boundaries of the serviced settlements will be required to 2029. In these cases some lands have been included as a strategic residential reserve, where they comprise infill or contiguous sites or have a planning history of residential use and can form part of the long-term sequential expansion of the settlement where considered appropriate.

Part of the subject lands are zoned for Strategic Residential Reserve and therefore are deemed suitable for residential development by the Planning Authority. We respectfully ask that the same consideration be given to the remaining lands on the subject site.

3.1

Physical Suitability

The Guidelines state the following in respect of Physical Suitability:

“The development plan should strive to ensure that the form and location of new development offers the best “value for money” in terms of efficient use of existing infrastructure, while minimising the need for costly new infrastructure. Where land in green-field locations is to be zoned, account should be taken, in considering the different options available, of the land’s capacity for development by way of the most cost-effective means of providing the necessary infrastructure.”

The subject site is served by the Tulla Road (R352). Additionally, indicative access to the site is marked with a purple arrow on the zoning map in the Draft Clare County Development Plan 2023-2029 (see Figure 8 and Figure 9) through the existing residential road at Lios Ard.

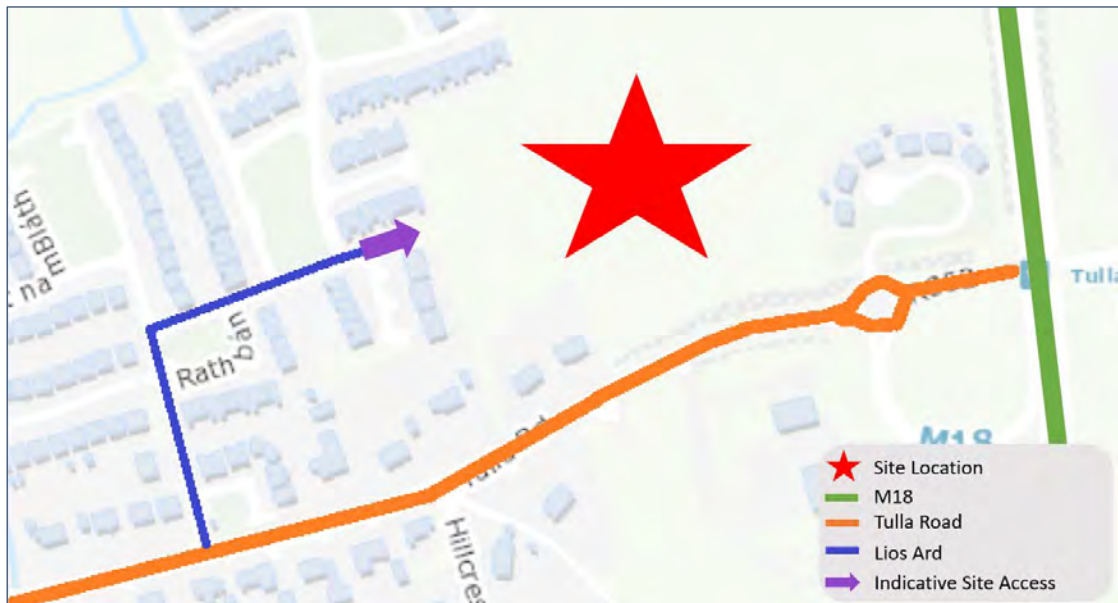


Figure 9 Showing Connectivity to the Site Source:MyPlan.ie Edited by MKO

3.2 Sequential Approach

The *Development Plans: Guidelines for Planning Authorities* state the following in respect of Sequential Approach when zoning lands -

“In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:

- (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. ‘leapfrogging’ to more remote areas should be avoided);*
- (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands;*
- (iii) Areas to be zoned should be contiguous to existing zoned development lands.”*

The subject lands are located within walking distance of two bus stops along the Tulla Road (An Sean Dun and Tulla Road). The site is surrounded by existing residential developments and would act as an infill site on lands that are currently under-utilised.

3.3 Need

Section 4.13 of the *Development Plans: Guidelines for Planning Authorities 2007* published by the Department of Housing, Local Government and Heritage states in relation to need that *“The amount of land to be zoned for any particular land-use must be clearly based on, and justified by, a realistic assessment of need. The survey and analysis stage of plan preparation should provide the baseline data to determine future land requirements. A number of factors need to be taken into consideration when determining the location and quantity of land to be zoned”*.

Table 1: Draft Plan Core Strategy for Ennis

2016 as a % of County	2016 population	Core Strategy 2023-2029 Allocation	Housing Units	Brown Field (30%)	Density Units/ha	Housing land required in ha	Zoning as per map in ha
21.3	25,276	2,705	1,550	465	35/15	58.90	90.39

As outlined in the Core Strategy included in the Draft Plan (**Table 2** above) there is an identified population growth of 2,705 people over the duration of the upcoming development plan (2023-2029) who are to be accommodated in 1,550 no. new residential units in Ennis. It is considered that there is an obvious and identifiable need for lands to be zoned for residential development at appropriate locations such as the subject lands.

4. THE PLANNING CASE

The extent of our client's landholding is pictured in Map 01 attached. This submission seeks one main outcome – for the land currently owned by our client which are zoned for Agriculture, Open Space and Low Density Residential in the current Development Plan and are proposed to be zoned for Agriculture, Open Space and Strategic Residential Reserve in the Draft Clare Development Plan 2023-2029, to be changed to Residential zoning.

The client is aware that it may not be possible to change all the lands in their entirety to residential. If that is the case, we respectfully request for the current lands zoned for Strategic Residential Reserve to remain zoned as so, and for the remaining lands which are owned by our client to be changed to Strategic Residential Reserve also.

As part of the planning case to provide Residential / Strategic Residential Reserve zoning on the client's lands, it is requested the Planning Authority note the following:

- The subject site is surrounded by clusters of residential development directly south and west of the subject lands.

The lands are located in a strategic location, approximately 3km from the Ennis Town Centre

- The Council do not appear to have demonstrated adequate justification for not zoning additional lands for residential development in this locality within the urban development boundary.
- The subject site is located within the dedicated lands for Roslevan neighbourhood (see Figure 7), which outlines the residential opportunities in the area neighbourhood.

Development potential could be fulfilled on the lands and help facilitate the housing need in Ennis which is demonstrated in **Table 2**.

- The subject site is connected to Ennis via an established pedestrian and vehicle infrastructure.
- The subject lands are directly linked to services in Ennis via an existing footpath along the road connecting the site (Tulla Road, R352)
- The subject site is serviced by two bus stops within walking distance (Tulla Road and An Sean Dun)
- The client will accept a Strategic Residential Reserve zoning on the entirety of the lands in his ownership.

Based on the assessment as outlined in this report, it is evident that the rezoning of these lands as 'Residential' is consistent with the guidance as outlined in the Development Plans: Guidelines for Planning Authorities 2007 published by the Department of Housing, Local Government and Heritage.

5.

CONCLUSION AND OUTCOMES SOUGHT

This submission has been prepared regarding the Draft Clare County Development Plan 2023-2029. This submission requests that the Planning Authority give consideration to the potential of our client's lands at Tulla Road, Ennis, Co. Clare, and to change the lands zoned Open Space, Agriculture and Strategic Residential Reserve, and change all land zoning to Residential, or Strategic Residential Reserve.

Outcome Sought

- Residential Zoning on the subject lands

or

- Strategic Residential Reserve on subject lands

It is considered the above scenario acknowledges the current zoning and specific characteristics of the subject lands. The lands are serviceable and accessible, and if appropriately zoned for Residential development, will serve to assist in the delivery of addressing the existing and future housing requirements of Ennis and County Clare.

We respectfully request that the Planning Authority give due consideration to these matters in the preparation of the forthcoming plan.



Map 1 Site Location of the Subject Site (Indicative Only)

