

SUBMISSION TO DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Lands at Knockanoura, Tulla Road, Ennis

Mr. Pat Burke

Issue: A

Customer Project Number: 2167

Customer Document Number:

Document Sign Off

SUBMISSION TO DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Lands at Knockanoura, Tulla Road, Ennis

Mr. Pat Burke
Issue A

File No: 6739

CURRENT ISSUE					
Issue No: A	Date: 21.03.22	Reason for issue: Submission to Draft Clare County Development Plan 2023-2029			
Sign Off	Originator	Checker	Reviewer	Approver	Customer Approval (if required)
Print Name	Mandy Coleman	Paddy Coleman		Mandy Coleman	
Signature	Authorised Electronically				
Date	21.03.22	21.03.22		21.03.22	

PREVIOUS ISSUES							
Issue No	Date	Originator	Checker	Reviewer	Approver	Customer	Reason for issue

1.0 INTRODUCTION

P. Coleman & Associates, Architects, Engineers and Planners have been appointed by Mr. Pat Burke 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. We are seeking to amend an area of proposed 'Buffer Space' and zone it as 'Residential'. We respectfully request that the Planning Authority take account of this submission.

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 provision of the 'Residential' zoning on the majority of the subject site.

Section 6: Conclusion

This section summarises our case for the reclassification of the majority of the *proposed 'Buffer Space'* zoning on the subject site to 'Residential'.

2. SUBJECT SITE

2.1 The Site

The subject site, outlined in red in Figures 1 and 2 below, is located approximately 1.25km from the centre of Ennis, on the northern side of the R352 Ennis to Tulla Road. The subject site measures approximately 0.463 hectares. There are two existing access points to the subject site, one directly from the R352 with a second from the Cloverhill housing estate to the north with provision for a third access onto Verdant Hill.

The subject site is bound to the south by the R352, to the north by Clover Hill Housing estate, to the east by Verdant Hill Housing estate and to the west by the River Fergus.

A stone wall with splayed entrance/exit is provided onto the R352. A concrete block plastered/capped wall measuring approximately 2m. high is provided along the eastern boundary onto Verdant Hill and Cloverhill housing estates.



Figure 1 – Site Location Map - Subject Site outlined in Red



Figure 2 – Aerial Image – Subject Site outlined in Red

The subject site is falls from the eastern side to the west and from the north to the south.

The subject site is currently in agricultural use with horses grazing in late spring/summer.

Our Client confirms that the subject site has not previously flooded.

Street view images of the subject site from Google Images from June, 2009 to October, 2021 are shown below.



Figure 3 – Google Street View – June, 2009



Figure 4 – Google Street View – January, 2010



Figure 5 – Google Street View – March, 2011



Figure 6 – Google Street View – June, 2017



Figure 7 – Google Street View – July, 2018



Figure 8 – Google Street View – October, 2021

2.2 Site Context

The subject site can be regarded as a vacant infill site located adjacent to/contiguous with the existing residential housing and the River Fergus. The surrounding contextual pattern of development this location consists of low to medium density 2-storey detached and semi-detached residential estates to the north and east with low density single housing along the northern side of the R352.

A public footpath and cycle track bounds the southern boundary and the subject site benefits from good access to amenities within easy walking distance. Figure 9 below shows at 1km and 2km. radius centres from the centre of the subject site, that parks, shops, petrol station, Roslevan Neighbourhood Centre, Avenue United Football grounds, Fairgreen, hospitals, primary schools, secondary schools are all located within 1 and 2km. of the subject site.

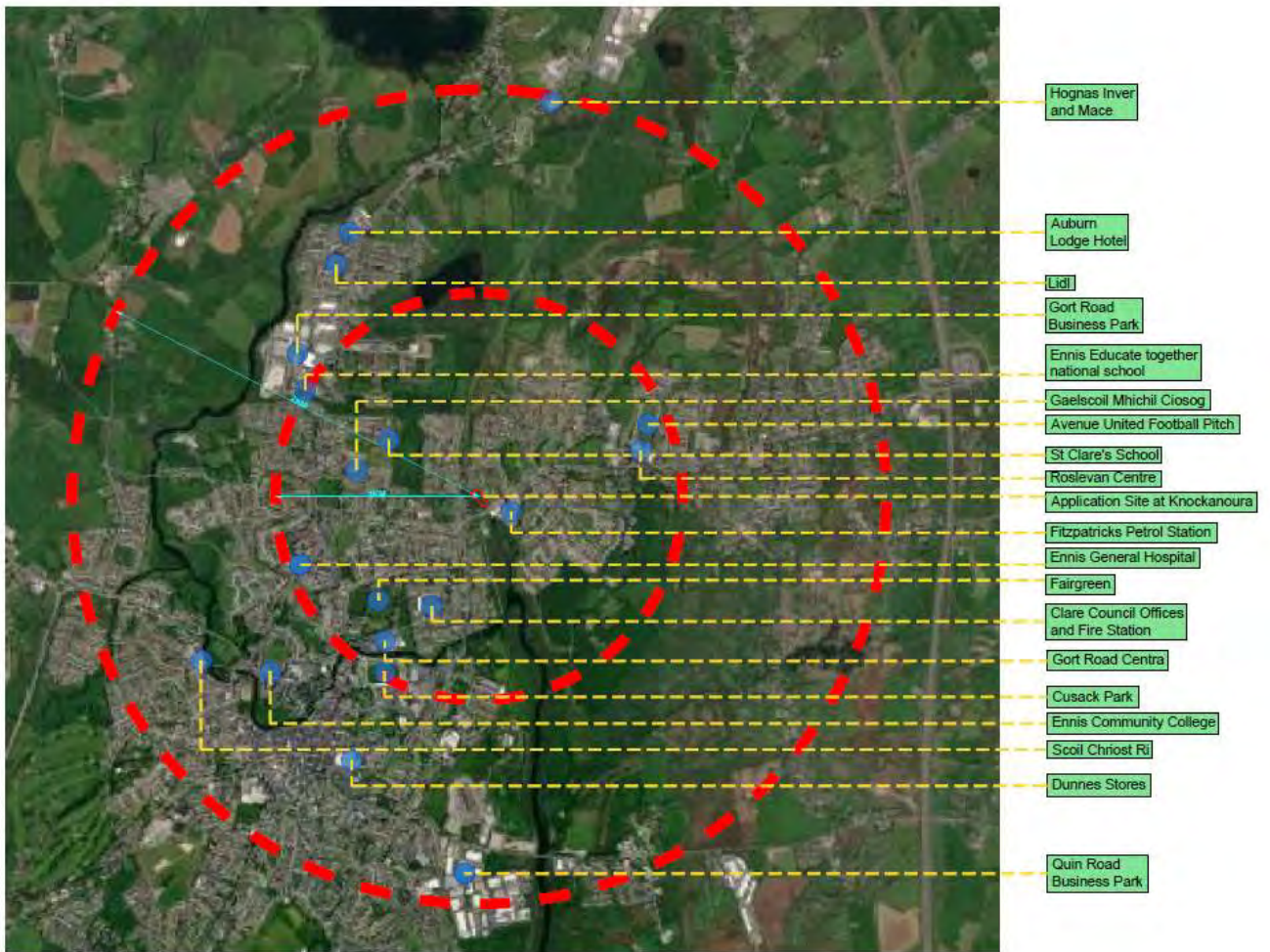


Figure 9 – Amenities map 1km and 2km from subject site showing just some of the amenities in these radius

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 residential 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. Under the concept of 'Compact Growth', which underpins much of the Strategy, the NPF is:



“Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. Making better use of under-utilised land, including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport”.

More balanced growth also means more concentrated growth. There are five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. The NPF targets these five cities for 50% of overall national growth between them, with Ireland’s large and smaller towns, villages and rural areas accommodating the other 50% of growth.

The NPF also supports making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. This ‘compact growth’ strategy is designed to counter the prevailing situation whereby the fastest growing areas are at the edges of and outside the cities and towns. This results in:

- A constant process of infrastructure and services catch-up in building new roads, new schools, services and amenities and a struggle to bring jobs and homes together, meaning that there are remarkably high levels of car dependence and that it is difficult to provide good public transport;
- A gradual process of run-down of city and town centre and established suburban areas as jobs, retail and housing move out, leaving behind declining school enrolments, empty buildings and a lack of sufficient people to create strong and vibrant places, both day and night;
- Most development takes the form of greenfield sprawl that extends the physical footprint of urban areas, and when it is the principal form of development, this works against the creation of attractive, liveable, high quality urban places in which people are increasingly wishing to live, work and invest.

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

National Policy Objective 3a seeks to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

National Policy Objective 3c 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;

National Policy Objective 6 relating to increased residential population and employment in urban areas;



National Policy Objective 11 which favours development that can encourage more people to live and work in existing settlements;

National Policy Objective 27 which prioritises walking and cycling accessibility to existing and proposed development;

National Policy Objective 33 relating to provision of new homes at locations that can support sustainable development;

National Policy Objective 35 relating to increased residential density in settlements.

3.1.2 Section 28 Ministerial Guidelines

There are various Ministerial Guidelines in respect of residential development with the most relevant to the subject site outlined below:-

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009),
- Adopted Development Plan Guidelines for Planning Authorities (2007),
- Draft Ministerial Guidelines on Development Plans for Planning Authorities (2021)

3.1.2.1 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009),

The role of the Guidelines for Planning Authorities on Sustainable Development in Urban Areas is to ensure the sustainable delivery of new development throughout the country. The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:-

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Are easy to access for all users and to find one's way around;
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;
- Provide a mix of land uses to minimise transport demand.

3.1.2.2 Adopted Development Plan Guidelines for Planning Authorities (2007)

These Guidelines on Development Plans are the adopted guidelines that are currently in place until such time as the current guidelines which are in draft form are adopted.

The Adopted Guidelines advise that development plans should anticipate future needs on an objective basis (Overview on Page 3) with needs driven assessments of future development requirements including the amount of land that needs to be zoned for particular purposes. It is stated that zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs is not consistent with established principles of proper planning and sustainable development.



Part 4.4 refers to the mandatory objective of zoning land. It is stated in Section 10(2)(2) of the 2000 Act, as amended, mandates a development plan to include objectives for:-

‘the zoning of land for the use solely or primarily of particular areas for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space or otherwise, or a mixture of these uses) and to such extent as the proper planning and sustainable development of the area, in the opinion of the planning authority, requires to be indicated’.

Section 4.4 also states that development plans perform an important task in setting out the framework within which the development needs of the economy, and society in general, can be responded to while maintaining, and where possible, improving the environment.

It is further stated in section 4.5 that *‘following the approach set out, a development plan should ensure that enough land will be available to meet anticipated development requirements and will be developed in a sequential and co-ordinated manner. This will avoid, for example, a situation where housing estates are built beyond the outer edges of existing built-up areas while intervening lands lie undeveloped resulting in deficiencies in terms of footpaths, lighting, drainage or adequate roads infrastructure’.* The suitability of these lands and the availability of infrastructure is identified and assessed below.

Crucially in the context of this submission, in addition to the above, when considering the suitability of specific land for development, within the process of preparing zoning objectives in making a development plan, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates, statutory obligations and Government policy. Matters typically relevant to ‘the proper planning and sustainable development’ of an area, inter alia, include:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

3.1.2.3 Draft Ministerial Guidelines on Development Plans for Planning Authorities (2021)

Section 1.5 of the draft Guidelines states that the development plan is now at the heart of a plan-led system whereby public capital investment programmes and priorities are aligned to support the adopted development strategy. The reverse is also set out later in the draft guidelines. This principle has been established through Project Ireland 2040 comprising both the NPF as the State’s national spatial development strategy and the National Development Plan (NDP) as the capital investment is intended to ensure a co-ordinated approach to investment in public infrastructure in a way that ties in with national and local spatial priorities. The development plan must therefore reflect and respond to programmed significant national infrastructural investment by the State.



Section 1.7 identifies Guiding Principles for the production of development plans including the following:-

- A vision for the area;
- Stakeholder engagement;
- A strategic balanced approach;
- The integration of sustainable development and climate change priorities;
- The structured management of change;

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.

Section 1.4.1 (Strategic Aims for Housing and Sustainable Neighbourhoods)

The strategic aims Goal 1, (of ten goals to be carried through into the LAP) provides for Housing and Sustainable Neighbourhoods facilitating sustainable and balanced population increases by way of land use zoning, provision for consolidation and range of social and physical infrastructure, encouragement of population growth and community development, and creation of strong vibrant neighbourhoods in the Ennis area with a high quality and mix of housing for all members of the community while achieving sustainable neighbourhoods and improving place making.

Proposals for new residential development must be in accordance with Section 28 Guidelines and be accompanied by a Design Statement. (Section 2.2) Development management standards for urban residential development are set out in Appendix 1.

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 10 – 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.

Other relevant policy objectives from the CCDP are outlined as follows:-

‘CDP4.2 Development Plan Objective: Facilitating the Housing, Needs of the Population

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’*

‘CDP4.4 Development Plan Objective: Social and Affordable Housing

A. *In accordance with the requirements of Section 94(4)(c) of the Planning and Development Act, 2000 (as amended), to reserve 10% of land zoned for residential use, or for a mixture of residential and other uses, including ‘low density residential’ for the purpose of meeting social and affordable housing need arising within the County’*

‘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;*
- B. *To require new housing developments to incorporate a variety of plot sizes to meet the current and future needs of residents;*

- C. To require the submission of a Statement of Housing Mix with all applications for multiunit residential development in order to facilitate the proper evaluation of the proposal relative to this objective’.

3.2.2 Zoning

The subject site is currently zoned as ‘Buffer Space’ in the CCDP.

The ‘Buffer Space’ zoning objective states as follows-

“Buffer spaces are intended to provide a buffer of undeveloped land for conservation of biodiversity, visual amenity or green space. Buffer spaces may include natural features such as floodplains, riparian zones, turloughs, valuable biodiversity areas including designated sites, amenity areas, woodlands, hedgerows, green spaces and archaeological features”.

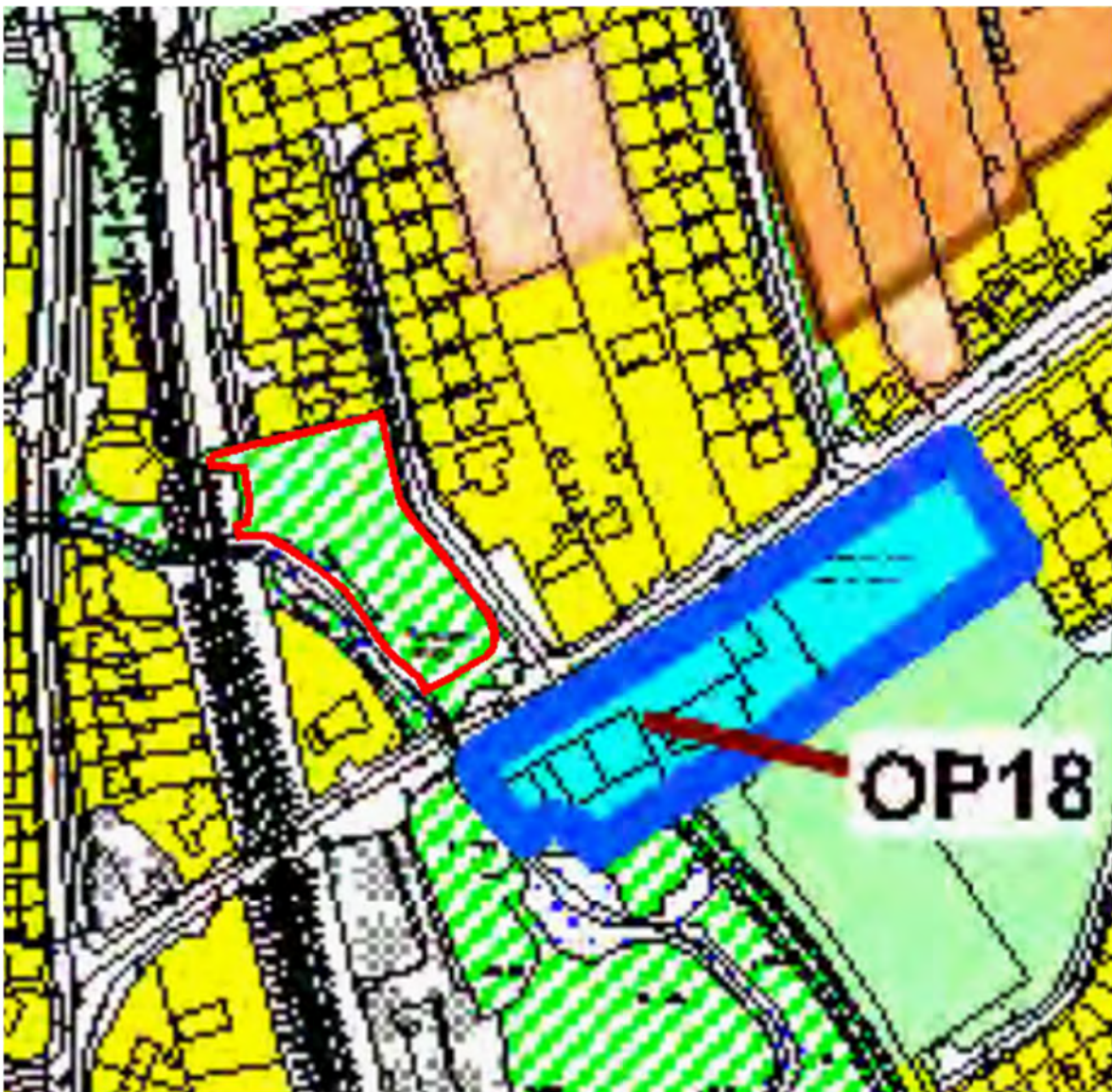


Figure 11 – Land Use Zoning Map Clare County Development Plan 2017-2023.

4.0 DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029 (DRAFT PLAN)

The Draft Plan proposes no change to the existing 'Buffer Space' zoning objective.



Figure 12 – Proposed zoning map Draft Clare County Development Plan 2023-2029.

The subject site is also located within the boundary of the Roslevan Neighbourhood – See Figure 13 below.

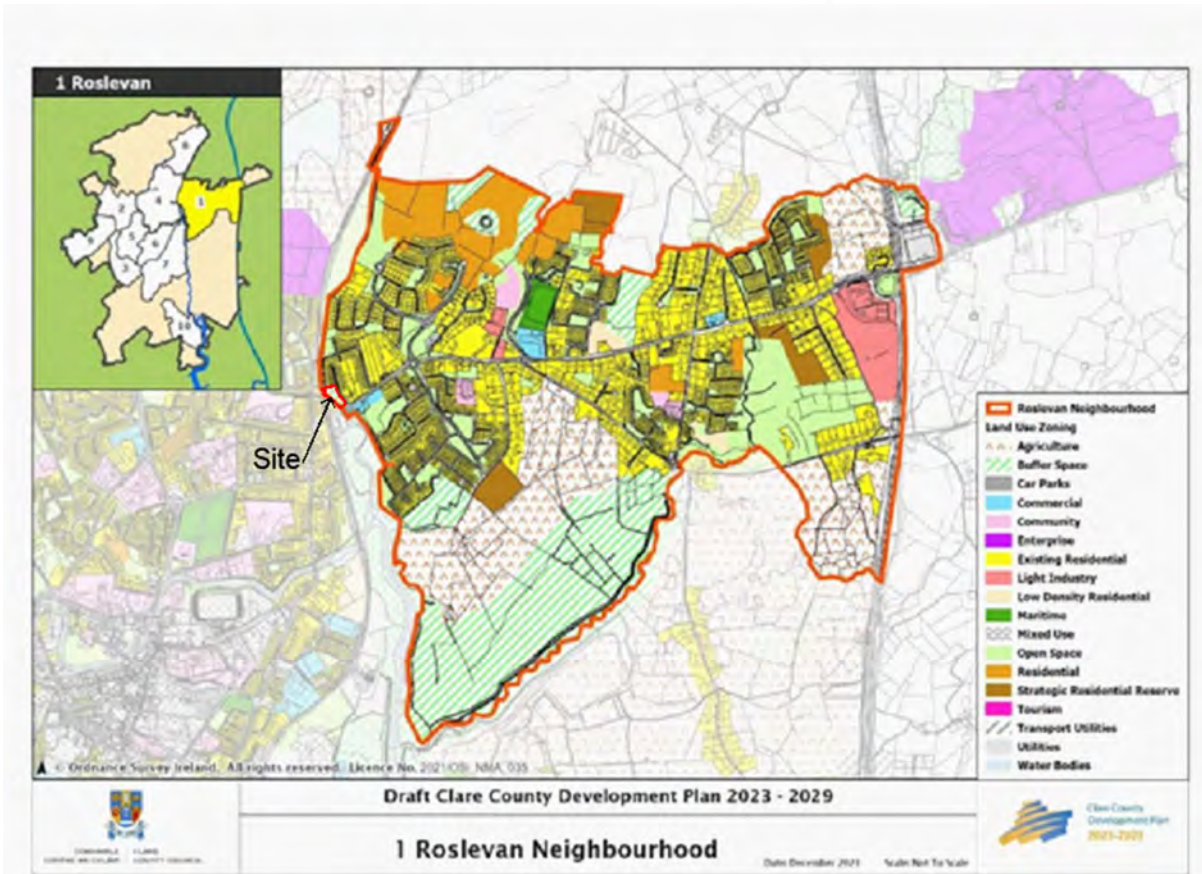


Figure 13 – Roslevan Neighbourhood - Subject Site

The rationale for requesting to amend the majority of the ‘*Buffer Space*’ zoning objective to ‘*Residential*’ is outlined in Section 5 below.

5.0 REQUESTED AMENDMENT

Amend majority of the ‘*Buffer Space*’ zoning objective to ‘*Residential*’

It is requested that the majority of the ‘*Buffer Space*’ zoning objective on the subject site be removed and reclassified as ‘*Residential*’ and to keep a portion of this subject site along the river bank as ‘*Buffer Space*’ to allow for the proposed indicative green route along the river as shown in Figure 14 below.

The proposed “*Residential*” zoning objective states as follows:-

“Residential use shall be taken to primarily include the use of land for domestic dwellings. It may also provide for a range of other uses particularly those that have potential to foster the development of new residential communities e.g. schools, crèches, open space etc.”

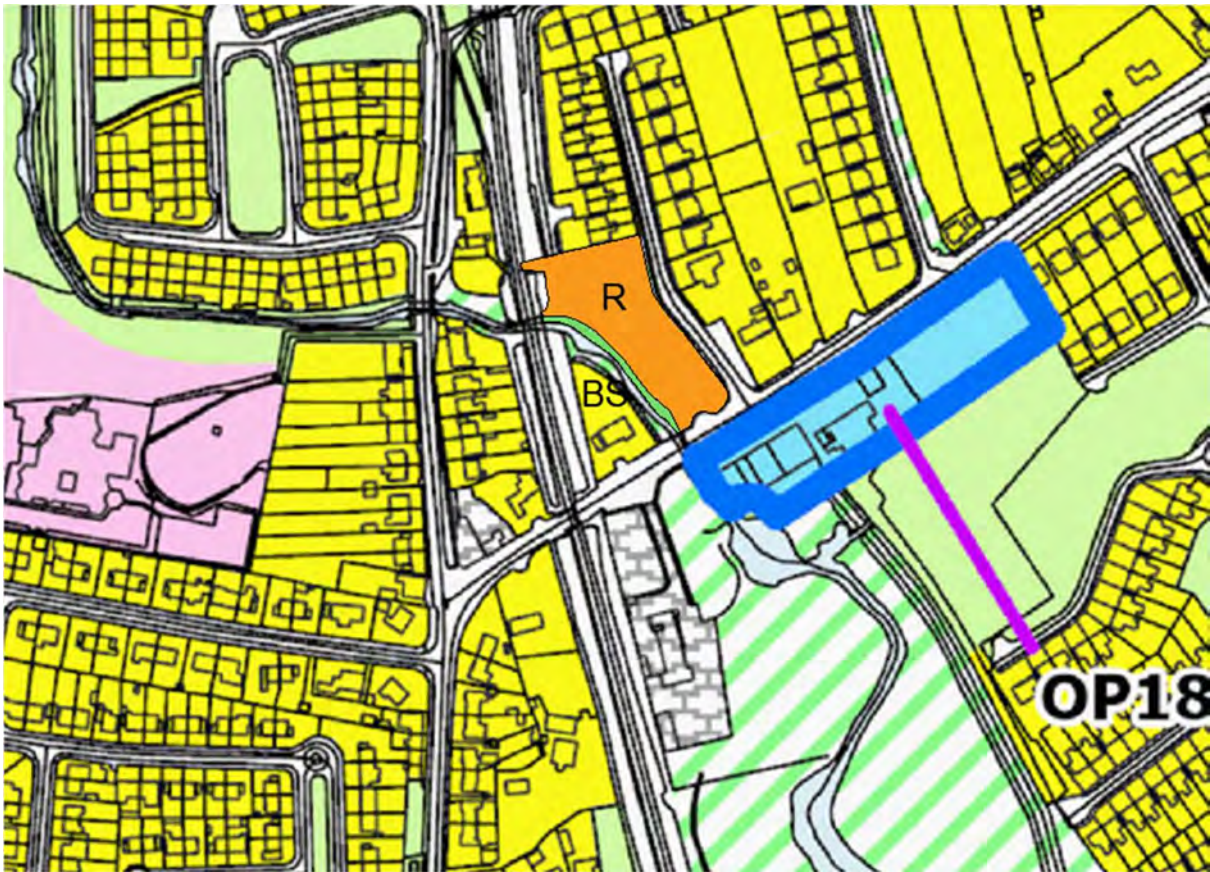


Figure 14 – Requested Amendment showing ‘Residential’ zoning objective to be applied to the majority of the subject site in Clare County Development Plan 2023-2029.

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 historic zoning and pattern of development in the area; 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.

The provision of the ‘Residential’ zoning on the majority of this site is consistent with the proper planning and sustainable development of the area for the following reasons:-

5.2 Principle of Residential Development.

The subject site was previously zoned as ‘Other Settlement Land’ in the Ennis & Environs Development Plan 2008-2014 where the objective was as follows:-

Policy SS7 – Other Settlement Land

“It is the policy of the Development plan to conserve and enhance the quality and character of the area, to protect residential amenity and allow for development that is appropriate to the sustainable growth of the settlement. Multiple units of houses or apartments will not be permitted on O.S.L. Exceptions to this include;

- (a) O.S.L. which has phase 1 status.*
- (b) O.S.L. within Barefield (phase1) and Toonagh where small scale low density residential development may be considered in line with policies SS2 and SS3”.*

The principle of residential development on the subject site has been established through the the zoning history. The proposals put forward in the Draft Plan now seeks to undermine the residential status of the site.



Figure 15 – ‘Other Land Settlement’ zoning as per Ennis & Environs Development Plan 2008-2014 (as varied)

In the midst of a serious housing crisis, it would be more appropriate to adopt a ‘Residential’ zoning on the subject site which could significantly contribute to providing much needed homes within the existing footprint of Ennis and its Environs and would be considered consistent with proper planning and sustainable development of the area.

5.3 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 16 below which shows the subject site well served in terms of infrastructure including road and footpath access (adjacent), lighting, drainage connectivity and water supply all available and all of which have capacity to accommodate development. These services have been brought to the entrance to the subject site from the north through the Cloverhill housing estate. As the subject site is fully serviced and accessible it was always intended to be developed for residential development as an extension of the Cloverhill housing estate. Adopting a ‘Residential’ zoning objective would facilitate utilization of serviced land within the existing settlement boundary without the need for settlement expansion.

Utility	Availability	Distance from Site
Surface Water	Yes	Available
Wastewater	Yes	Available
Broadband (Wired & Wireless)	Yes	Available
Electricity	Yes	Available
Water	Yes	Available
Public Lighting	Yes	Available
Footpath	Yes	Available
Cycle Path	Yes	Available

Figure 16 – Existing Infrastructure at the subject site.

The development plan process has a strategic role to play in facilitating new development and investment in settlements so that it can support the provision of new homes in areas of greatest housing demand as well as people living closer to employment, recreational opportunities and other services. The proposed development will deliver on the strategic role of the plan, providing housing within the settlement boundary of Ennis in proximity to employment, recreational opportunities and other services.

The subject site is extremely suitable for residential use being located within an established centrally located residential area and close to an established local retail and community services and wider neighbourhood centre uses including a butcher, pharmacy, off-licence, betting office, and petrol station. The subject site is also within cycling and walking distance of main town of Ennis and within close proximity to a Roslevan Neighbourhood Centre.

In addition there are a number of access points to the subject site through the existing adjoining housing estates and from the main Tulla Road making this site highly accessible.

5.4 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 sequential approach as set out in the DoEHLG Development Plan Guidelines specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands and that any exception must be clearly justified in the written statement of the development plan.

Our Clients site is sequentially preferable to other residentially zoned lands within the Roselvan Neighbourhood area. It is submitted to the Planning Authority that zoning the subject site for residential use would inherently comply with the sequential approach to development and ensure compliance with SPPR DPG7 of the Draft Development Plan Guidelines.

In addition to achieving compact growth it is a further important planning principle to adopt the so-called ‘*sequential principle*’ in the choice of development lands. This means that the ‘*leap-frogging*’ of land should be avoided, and that normally new residentially zoned land should be adjacent to existing developed lands.

Providing a ‘*Residential*’ zoning objective on the subject site would represent a sequential approach to development which would form a natural continuation of development under the sequential development principle in accordance with the proper planning and sustainable development of the area and the provisions of the recently published Draft Development Plan Guidelines for Planning Authorities (SPPR DPG 7).

5.5 Flooding

We refer to the High Probability Flood Map in Figure 17 below which shows any risk of flooding to the subject site is very minor.

The extent of the potential flood risk is limited and does not encroach significantly on the subject site.

Our Client has no issue with a specific ‘*Residential*’ zoning objective on the Draft Plan for the site stating ‘*Any development proposals must be accompanied by a Flood Risk Assessment to consider surface water management and discharge, whether this is to the River Fergus directly or into the surface water system, particularly during (but not limited to) flood events. A small area on the western side of the site is within Flood Zone A*’

Any planning application for housing on the subject site would be assessed on its own merits and on site suitability.



Figure 16 OPW High Probability Flood Risk Map

5.6 Buffer Space Zoning Inappropriate

The zoning objective for ‘*Buffer Space*’ is quoted under Section 3.2.2 above of this submission, however, its application to the full extent of the subject site is entirely unjustified. According to our Client, there is no evidence to support the zoning of the full extent of this site as ‘*Buffer Space*’. The subject site is not located in a flood plain or within a riparian zone and is not designated or of a particular specific amenity value. There are also no National Monuments on the subject site. The subject site is grazed by horses and there is little logic to the proposed ‘*Buffer Space*’ landuse zoning on the full extent of the subject site to provide an ‘*ecological*’ function. The subject site does not offer any ecological corridor or function or natural amenity.

Our Client is aware that a certain amount of a buffer area will be required between the subject site and the river. The submission seeks the retention of part of the ‘*Buffer Space*’ zoning along the river bank to allow for the proposed indicative green route along the river bank (See Figure 13 above).

6.0 CONCLUSION

We request that a ‘*Residential*’ zoning objective be applied to the majority of the subject site with a portion along by the river bank being maintaining the proposed ‘*Buffer Space*’ zoning objective. 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.

It is submitted that the use of the full extent of the subject site as ‘*Buffer*’ is irrational and presents an underutilisation of the carrying capacity of the infrastructural setting of the site which is fully suited residential use.



The development of the subject site for residential use inherently complies with the overarching policies and NPOs of the NPF to encourage '*compact growth*' and to accommodate part of the population increase projected for Ennis in appropriate locations. The subject site is ideally situated within walking distance Ennis town centre. The subject site is serviced and close to the established urban social infrastructure of the town and provides a far superior sustainable alternative to lands located in peripheral greenfield locations that are reliant on new infrastructure to become developable. The principal zoning of the subject site for Residential use will contribute to the realisation of NPF objectives in relation to population growth. The sterilization of the subject site with the 'Buffer Space' zoning objective zoning runs counter to the policy objectives of the NPF.

In principle, new residential development on the subject site within the town is acceptable and to be encouraged in view of the historic land use zoning, and 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 this submission request is therefore in accordance with the requirements of national, regional and local Policy.