

SUBMISSION TO DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Lands at Corofin, Co. Clare

The Fleming Family

Issue: A

Customer Project Number: 6848

Customer Document Number:

Document Sign Off

SUBMISSION TO DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Lands at Corofin, Co. Clare.

The Fleming Family
Issue A

File No: 6739

CURRENT ISSUE					
Issue No: A	Date: 27.03.22	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	27.03.22	27.03.22		27.03.22	

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



1.0 INTRODUCTION

P. Coleman & Associates have been appointed by the Fleming Family 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 Corofin Village.

It is noted that the land the subject of this submission is proposed to be re-zoned from '*Low Density Residential*' to two different zoning objectives as follows;-

- (i) '*Residential*' with the specific zoning objective of '*R2*' and this is welcomed and supported by our Clients and
- (ii) '*Strategic Residential Reserve*' - it is requested that this portion of subject land be rezoned to '*Residential*' and be included in the '*R2*' zoning objective.

Section 2: Subject Site

This section provides a description of the site, its context, and the relevant planning history.

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 approval of the proposed '*Residential*' '*R2*' zoning objective on part of the subject site and seek an area proposed to be zoned as '*Strategic Residential Reserve*' to be rezoned as '*Residential*' and included within the '*R2*' zoning objective.

Section 6: Conclusion

This section summarises our case for the adoption of the proposed residential zoning objective and the inclusion of an additional area.

2. SUBJECT SITE

2.1 The Site

The subject site, outlined in red in Figures 1 and 2 below, is located within the village of Corofin, north west of Ennis Town Centre. Access to the subject site is via an existing agricultural access which accesses directly onto the R476 regional route.

The subject site measures approximately 1.689 hectares and is located to the rear of the existing housings fronting onto the R476. The subject site is bounded to the north by existing housing and a vacant site, to the south and west by agricultural land and to the east by existing housing.

The subject site for the most part is level pastureland and is currently in agricultural use.

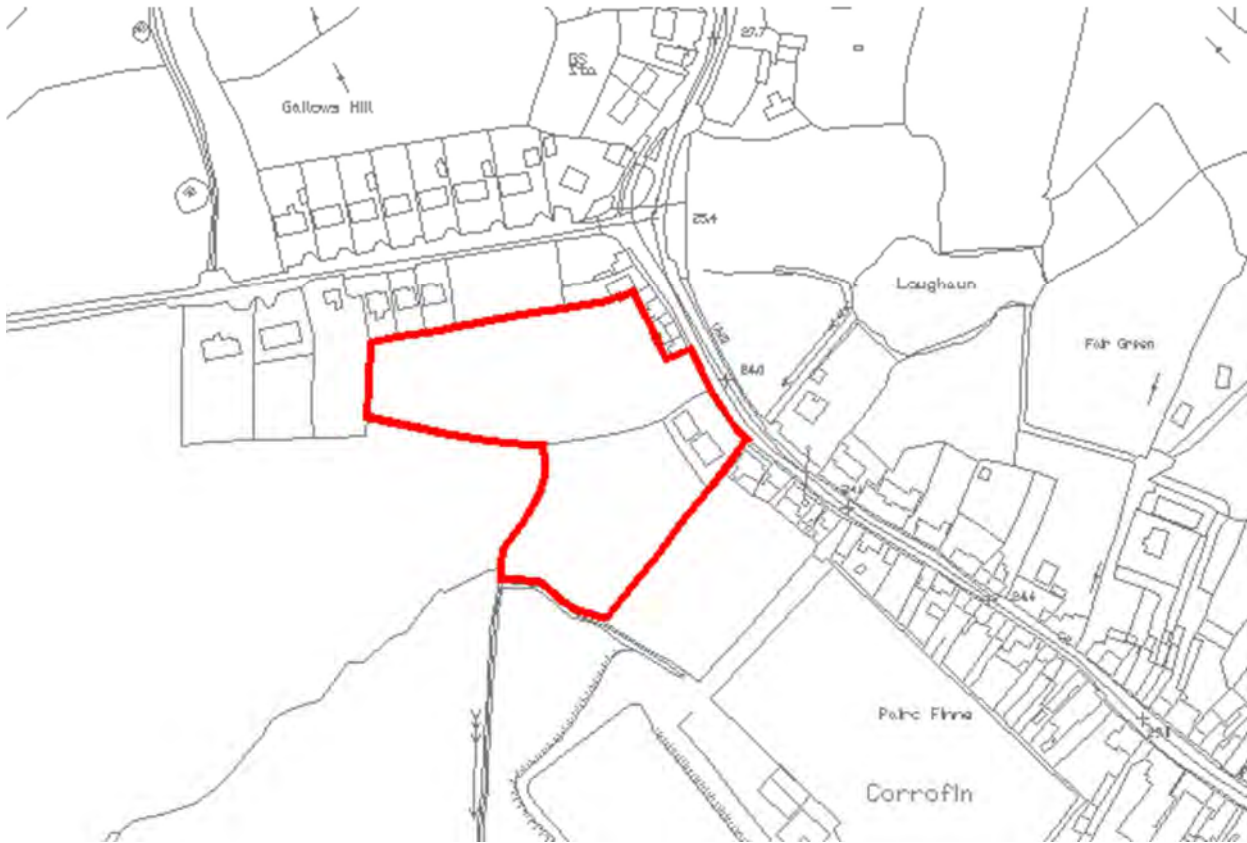


Figure 1 – Site Location Map – Subject Site outlined in Red



Figure 2 – Aerial Image of Site outlined in red

2.2 Site Context

Corofin is located approximately 12km from Ennis and is an attractive village to live in given its proximity to Ennis and is under substantial pressure for housing.

The subject site benefits from good access to amenities within easy walking distance including shops, health care centre, pitches playground, church, school, post office, Garda Station, chemist, library, heritage centre and genealogy centre, restaurants and public houses. The subject site is connected to the village of Corofin by footpath.



3.0 PLANNING CONTEXT

The following section outlines the key national and regional planning policies which support the adoption of the proposed zoning objective and the proposed minor amendment to the Draft Plan for the subject site and the current local level planning policies for the residential zoning of the 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:-

NPO3c 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, which 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.

NPO16-Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.

NPO35-Increase 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 2.5 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”*.

In Section 5.3 Planning for Future Growth and Development of Rural Areas, it is noted that the Central Statistics Office (CSO) defines rural as the areas outside settlements of fewer than 1,500 people, home to around 20% of the population of rural areas, and individual dwellings in the countryside, which together comprised approximately 37% of the population in 2016. This reflects Ireland's historical rural and village settlement pattern.



3.1.2 Section 28 Ministerial Guidelines

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

- Adopted Development Plan Guidelines for Planning Authorities (2007),
- Draft Ministerial Guidelines on Development Plans for Planning Authorities (2021)

3.1.2.1 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.

3.1.2.2 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. The strategy of the RSES is to build a strong, resilient sustainable region with eleven 'Statements of the Strategy' identified including Company Growth. Strengthening and growing our cities and metropolitan areas; harnessing the combined strength of our three cities as a counterbalance to the Greater Dublin Area, through quality development; regeneration and compact growth; building on the strong network of towns and supporting our villages and rural areas. The Strategy focuses on '*Key enablers*' including '*Revitalising Rural Areas*' through readapting our small towns and villages and increasing collaboration between networks of settlements to seek higher value, diversified jobs for a higher quality of life.



The RSES has built on these principles and has included an objective to promote the “10-minute” town concept, whereby community facilities and services area accessible within short walking timeframe.

Table 3.2 of the RSES identifies settlement types and categories and identifies Cities Metropolitan Areas as the top tier in the table. The attributes of Metropolitan Areas are “*accessible with national and international connectivity, strong business core, innovation, education, retail, heath and cultural role*”.

Section 5.0, the RSES recognises that the NPF acknowledges that there is a need for more proportionate and tailored approaches to residential development. This means that it is necessary to adapt the sale, design and layout of housing in towns and villages, to ensure that suburban or high-density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village.

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 Objectives for Corofin are

- To ensure that future development in Corofin encourages a vibrant village community, which maintains and enhances the economic and service role of Corofin village to residents, tourist and the surrounding rural area.
- To protect the built and natural heritage while allowing for balanced growth and development of the village and surrounding area.
- To make provision for additional car and bus parking facilities in the village that will contribute to an improved quality of environment and increased development potential.

The Strategy for Growth and Sustainable Communities states that it is important to ensure that growth is balanced and contributes to a thriving village community that can support a range of services. In this regard, lands have been zoned in the village to promote compact growth and support the village centre. Development proposals must ensure safe pedestrian and cycle connectivity to local services in the village centre.

It is an objective

- To support the development of facilities, amenities and services in the village that will cater for the needs of a range of users including current and future residents and will contribute to the sustainable development of the village into the future.

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'.*

'CDP8.8 Development Plan Objective: Design Manual for Urban Roads and Streets (DMURS)

To implement the requirements and recommendations contained in DMURS in the assessment of development proposals, the preparation of design schemes and their implementation in the development of streets, roads and public realm improvement schemes in the County'.

'CDP8.24 Development Plan Objective: Water Supply

- A. To ensure that adequate water services will be available to service development prior to the granting of planning permission and to require developers to consult Irish Water regarding available capacity prior to apply for planning permission;*
- B. To ensure that development proposals comply with the standards and requirements of Irish Water in relation to water and wastewater infrastructure for facilitate the proposed development.*



'CDP8.35 Development Plan Objective: Light Pollution

- A. *To require proposals for development that include the provision of external lighting, to clearly demonstrate that the lighting scheme is the minimum needed for security and working purposes;*
- B. *To ensure that external lighting and lighting schemes are designed so that the incidence of light spillage is minimised ensuring that the amenities of adjoining properties, wildlife and the surrounding environment are protected'.*

'CDP14.2 Development Plan Objective: European Sites

- A. *To require all planning applications for development that may have (or cannot rule out) likely significant effects on European sites in view of the site's Conservation Objectives either in isolation or in combination with other plans or projects, to submit a Natura Impact Statement in accordance with the requirements of the EU Habitats Directive and the Planning & Development Act, 2000 (as amended)'*

CDP14.3 Development Plan Objective: Requirement for Appropriate Assessment under the Habitats Directive

- A. *To implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European Sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011;*
- B. *To have regard to 'Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities 2009' or any updated version'.*

'CDP14.11 Development Plan Objective: Habitat Protection

- A. *To promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area;*
- B. *To ensure that there is no net loss of potential Lesser Horseshoe Bat feeding habitats; treelines and hedgerows within 3km. of known roosts.*

'CDP17.1 Development Plan Objective: Achieving Quality in the Public Realm

- A. *To require both public and private development to make a positive contribution to the public realm;*
- B. *To require proposals for development in excess of 3 residential units or 300m² to be accompanied by a design statement demonstrating how the 12 urban design principles set out in the Urban Design Manual (2009) have been addressed. A design statement may be required for smaller developments in instances where the proposed development is situated in a key location in the town or village'.*

3.2.2 Zoning

The majority of the subject site is zoned as *Low Density Residential* in the West Clare Municipal District Plan - Volume 3d of the CCDP and forms part of a block of land identified as 'LDR7'. A small corner of the subject site is zoned as 'Buffer Space'. See figure 5 below.

The '*Low Density Residential*' zoning objective states as follows-

'This zoning refers to the use of lands to accommodate a low-density pattern of residential development, primarily detached family dwellings. The underlying priority shall be to ensure that the character of the settlement/area is maintained and further reinforced by a high standard of design. Proposed developments must also be appropriate in scale and nature to the areas in which they are located.'

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".

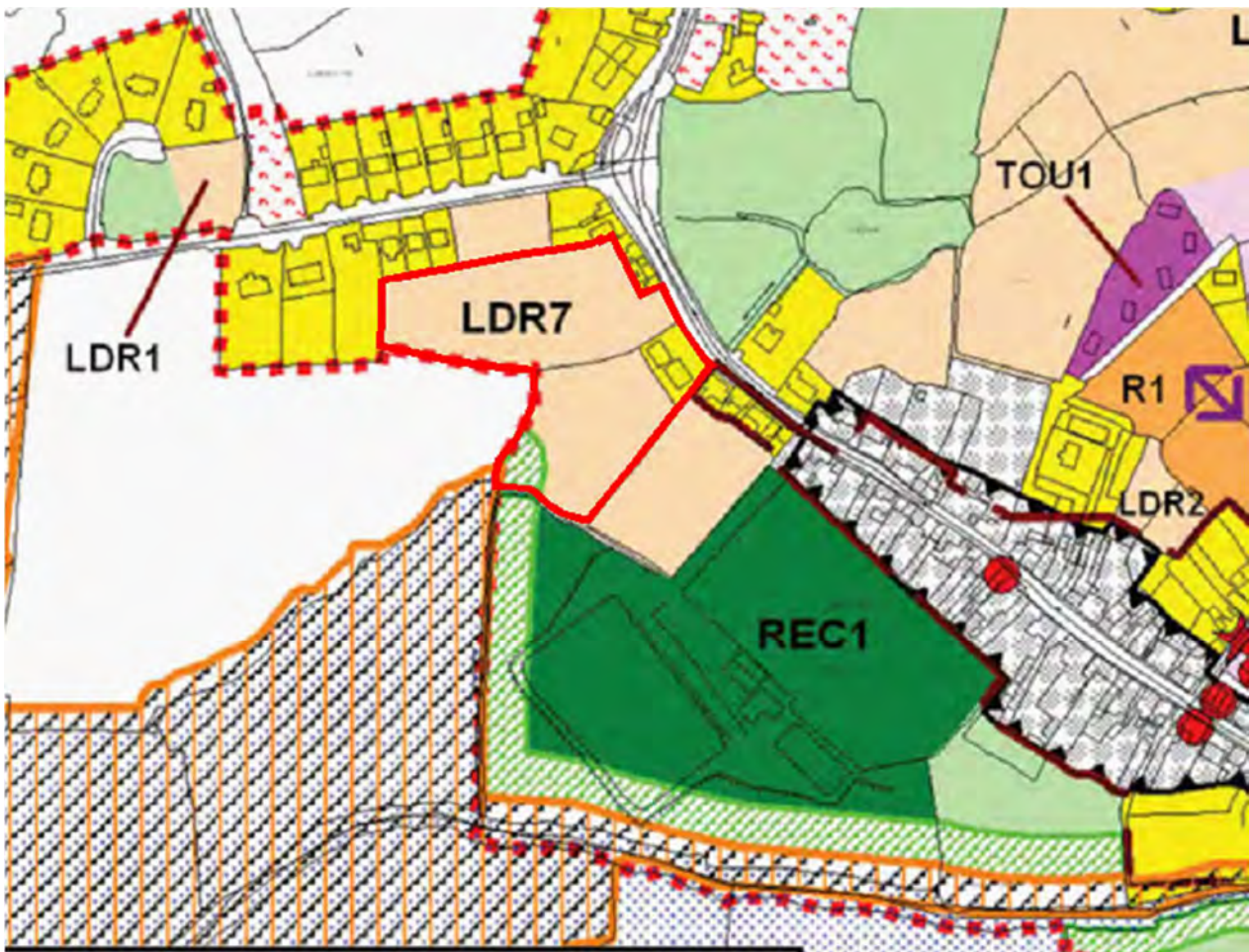


Figure 5 – Land Use Zoning Map - Subject Site outlined in Red - Clare County Development Plan 2017-2023.

4.0 DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

The Draft Plan proposes to zone part of the subject site as ‘Residential’ with the specific zoning objective of ‘R2’. The remain part of the subject site is to be rezoned as ‘Strategic Residential Reserve’ with the ‘Buffer Space’ zoning being maintained. See Figure 6 below.

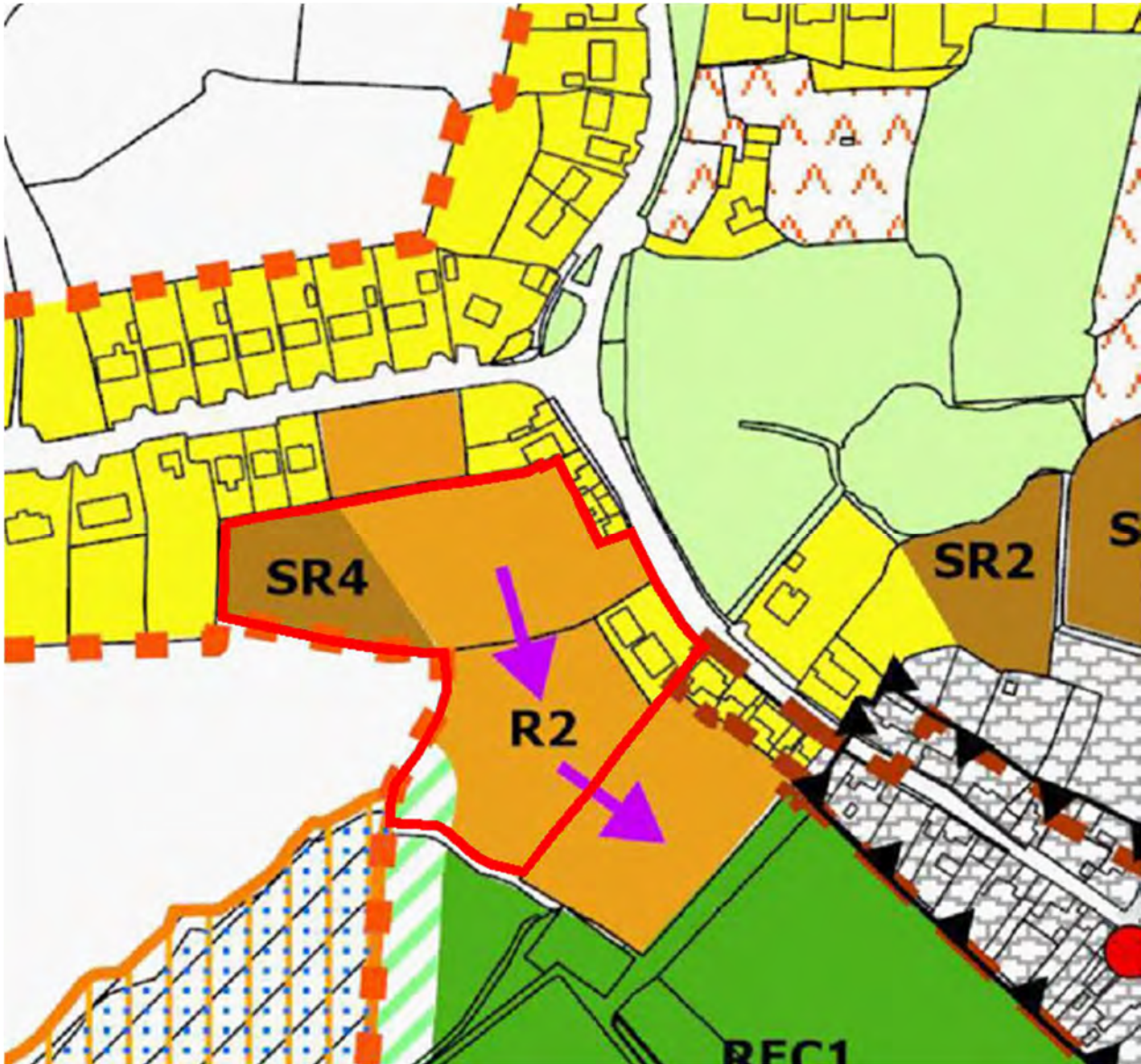


Figure 6 – Proposed zoning map – Subject site outlined in Red - Draft Clare County Development Plan 2023-2029

The '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 spaces."

The specific 'R2' zoning objective states as follows:-

This site is located directly adjacent to the Architectural Conservation Area (ACA) in the village centre. The aim is to retain the overall special historic or architectural character of an area as per CDP 16.8 of this plan (Vol.1) and in this regard any development within this zoning shall be designed in line with the overall protective objectives and mitigation measures of the development plan. In addition, any future development on these lands shall retain linkages across the landscape including existing hedgerows and treelines.

The 'Strategic Residential Reserve' zoning objective states as follows:-

"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 were considered appropriate.

In addition to protecting these lands for the long-term expansion of these settlements, consideration may be given to the development of some of the strategic residential reserve before the end of the current plan period where the Planning Authority is satisfied that the development of zoned land is progressing faster than expected and a shortage of available lands may arise or residential zoned land may not be delivered as expected and a shortage may arise during the plan period.

The development of such lands will only be considered from the beginning of year four of the Plan (April 2027) in order to give an opportunity for zoned land to be brought forward for development, and where it can be clearly demonstrated to the satisfaction of the planning authority that a zoned parcel of land will not be brought forward for development due to infrastructural or other demonstrable constraints during the remaining period of the Plan. It will also be a requirement that the proposed strategic residential reserve lands can be serviced and offer a reasonable substitute in terms of being delivered within the lifetime of the plan and are sequential development with good connectivity and access to services and amenity

The Corofin plan acknowledges that not all of the lands within the settlement boundary will be required to 2029. Lands which comprise infill or contiguous sites or have a planning history for residential use and can form part of the long-term sequential expansion of the settlement are zoned SRR. Consideration maybe given to the development of some SRR lands before the end of the plan period, in line with the provisions set out for SSR in Section 19.4 of Volume 1.

5.0 REQUESTED AMENDMENT

5.1 Adopt proposed 'Residential' 'R2' Zoning and rezone 'SSR4' parcel to 'Residential' and include within 'R2' zoning objective.

It is requested that the proposed 'Residential' 'R2' zoning objective on part of the subject site be adopted and to include the parcel subject site proposed to be zoned as 'Strategic Residential Reserve' 'SSR4' within the 'Residential' 'R2' zoning objective as identified in Figure 7 below.

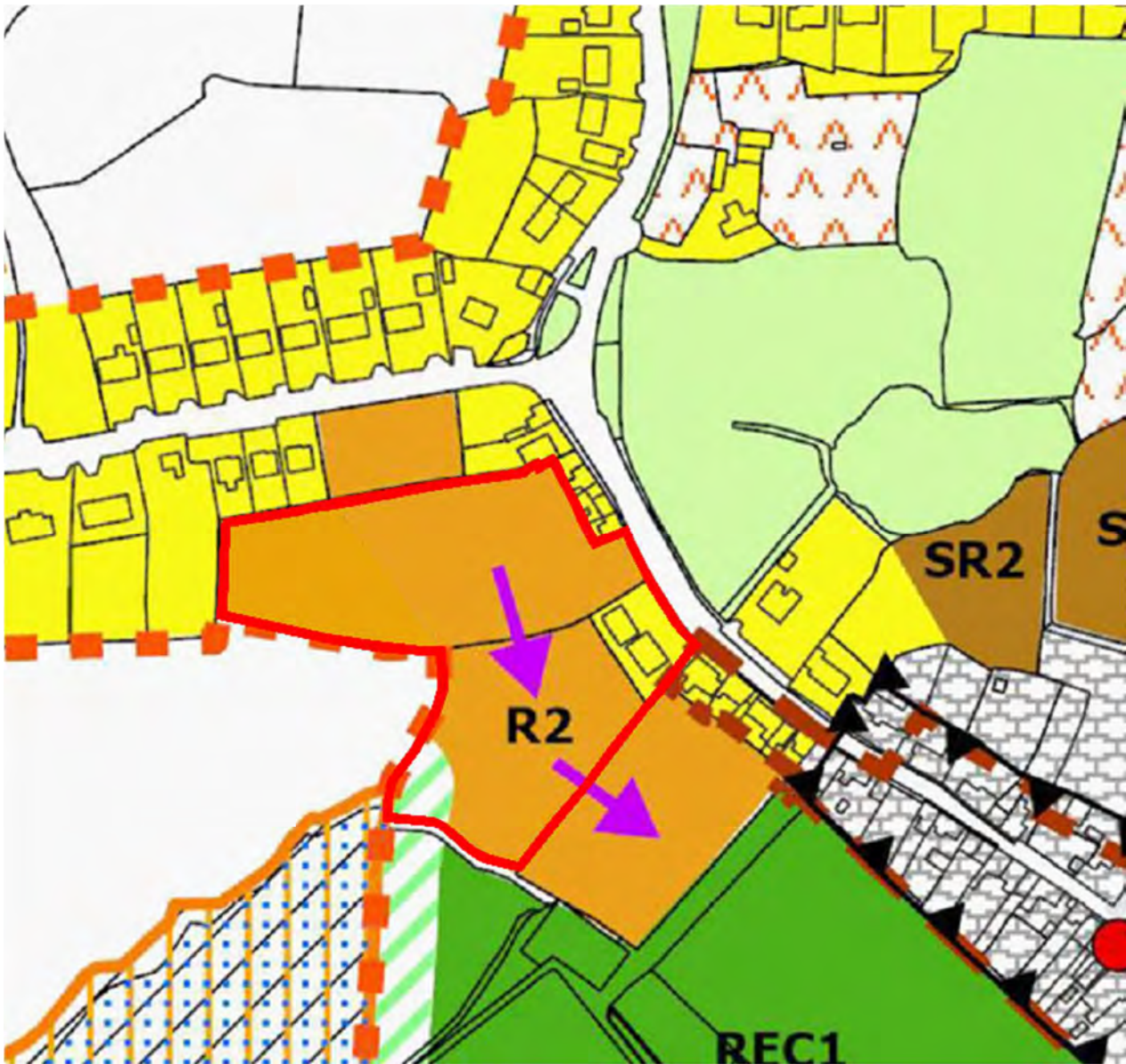


Figure 7 – Requested Zoning Map



The adoption of the 'Residential' 'R2' zoning objective with the inclusion of the 'SSR4' portion proposed to be zoned as 'Strategic Residential Reserve' is consistent with the proper planning and sustainable development of the area for the following reasons:-

5.2 Principle of Residential Development.

As identified under Section 3.3 of this submission, the subject site is zoned 'Low Density Residential' 'LDR7' in the CCDP. Its allocation was considered through the plan making process and determined to be consistent with the proper planning and sustainable development of Corofin village. The principle of residential use on the subject site has been established.

Adopting the proposed 'Residential' zoning on the subject site, and to rezone the 'SSR4' parcel within the 'R2' zoning will ensure a well-balanced approach to a housing development on the full site which is within our Clients ownership. To provide for residential use on the full subject site for development during the period of the plan is considered consistent with proper planning and sustainable development of the area.

5.3 Delivery of Residential Development.

The recently published Draft Development Plan Guidelines clearly state that the "planning authorities should approach the development plan with a clear focus on the delivery of expected development outcomes".

The Draft Plan has proposed tracts of zoned residential land which cannot be developed in the short term due to infrastructure deficiencies. Whilst it is important that such lands may form part of a long-term strategic land reserve, it is noted that they cannot be immediately developed for the provision of much needed housing. This is in stark contrast to the subject site and its ability to provided for approved housing in the immediate short term. Accordingly, it is submitted to the planning authority that the subject site should be prioritised for development and fully zoned for residential use in the short term.

5.4 Planning for Compact Growth

The NPF seeks to achieve more compact and sustainable growth through consolidation of 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. Adopting a ‘Residential’ zoning objective on the full site 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	Onsite Disposal
Wastewater	Yes	Available
Broadband (Wired & Wireless)	Yes	Available
Electricity	Yes	Available
Water	Yes	Available
Public Lighting	Yes	Available
Footpath	Yes	Available

Figure 8 – 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 Corofin in proximity to employment, recreational opportunities and other services.

Zoning the full extent of the subject site for residential purposes will ensure that a portion of new development reflects the compact growth and town centre first agenda, which is also a key dynamic in addressing climate change, through reducing dependence on car-based transport, the extent of green-field land consumption and costly and inefficient infrastructure provision and use. In this instance, the development plan is provided with an opportunity to deliver a framework for development, which ensures a close correlation between facilitating housing on land with infrastructural capacity whilst also ensuring that a substantial element of future growth contributes to the regeneration of Corofin village.



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 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.

It is submitted to the planning authority that the subject site is *‘infill and backland’* in nature having regard to its location surrounded by housing to the north and east.

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 DPG 7 of the Draft Development Plan Guidelines.

6.0 CONCLUSION

On behalf of our Client, we request that the proposed *‘Residential’ ‘R2’* zoning on the subject site be adopted and that the parcel with the subject site proposed to be zoned as *‘Strategic Residential Reserve’ ‘SSR4’* be rezoned to *‘Residential’* and form part of the *‘R2’* block in the Draft Plan. This will ensure a well-balanced approach to the development of the full site which is within our Clients ownership which is considered consistent with the proper planning and sustainable development of the area.

The development of the subject site 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 the settlement boundary of Corofin. The principal zoning of the subject lands for *‘Residential’* use will contribute to the realisation of NPF objectives in relation to population growth.

It is submitted that the adopting of the requested proposal is therefore in accordance with the requirements of national, regional and local Policy.

Our Client requests that this submission is considered during the Draft Plan process.