

SUBMISSION TO DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Lands at Ballaghboy, Doora, Ennis, Co. Clare

Clare District Soccer League

Issue: A

Customer Project Number: 6860

Customer Document Number:

Document Sign Off

SUBMISSION TO DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Lands at Ballaghboy, Doora, Ennis, Co. Clare

Clare District Soccer League
Issue A

File No: 6860

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 Clare District Soccer League 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 the settlement of Ennis. The headquarters of the Clare District Soccer League (CDSL) is at Frank Healy Park which is located at Ballaghboy, Doora, Ennis just off the R467 Ennis to Quin Road. The CDSL has ambitious plans to convert the existing grass pitch into an Astro-Turf surface and to construct three additional grass pitches to the rear of the existing facility. These new pitches will be in lands south of the existing pitch and in lands which are partly zoned Agriculture' and 'Buffer Space'. The subject lands are partly owned by Mr. John McCabe and Mr. Michael Vaughan. CDSL is seeking to extend the existing 'Recreational' use on their existing facility at Ballaghboy, Doora Ennis to allow for the provision of the 3 additional playing pitches within the period of the plan.

The submission will be outlined as follows:-

Section 2: Subject Site

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

Section 3: Current Planning Context

This section outlines the current zoning and policy objectives for the subject site together with the planning history.

Section 4: Proposed Planning Context in Draft Plan

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

Section 5: Requested Amendments

This section sets out the case to extend the existing 'Recreational' use on their existing facility at Ballaghboy, Doora Ennis to allow for the provision of 3 additional playing pitches within the period of the plan.

Section 6: Conclusion

This section summarises our case as outlined in this submission.

2. SUBJECT SITE

The subject site is located to the rear of the existing Frank Healy Park and is south of the R469 Ennis to Quin Road. The subject site comprise of green fields which are currently in agricultural use.

The surrounding lands uses consist of zoned land including the CDSL existing sports grounds, industrial estate, agricultural lands and yard and residential housing.



Figure 1 – Site Location Plan – Subject Site outlined in red existing facility shaded in green.



Figure 2 – Aerial Image - Subject Site outlined in red existing facility outlined in blue



3.0 PLANNING CONTEXT

3.1 Local Planning Context

The operative development plan for the subject site is the Clare County Development Plan 2017-2023 (CCDP). The subject site forms part of the town settlement of Ennis, which is included in the Ennis Municipal District Plan, Volume 3a of the CCDP.

The subject site has two zoning objectives (See Figure 3) as follows:-

'Agriculture' where the zoning objective is stated as follows:-

"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. Immediate family members would include:

- *Parents*
- *Children*
- *Siblings"*

'Buffer Space' where the zoning objective is stated 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 3: Land use Zoning Map – Ennis Settlement Plan

Source: Volume 3 of the 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 zoning provisions on the subject site and there is no change to these zoning objectives proposed – See Figure 4 below.

‘Recreation’ where the zoning objective is stated as follows:-

“This category of zoning provides for the use of land for the provision of sports grounds/playing pitches, golf courses, tennis courts and other active indoor and outdoor recreational facilities that contribute to meeting the leisure, recreation and amenity needs of the immediate community and/or the wider area”.

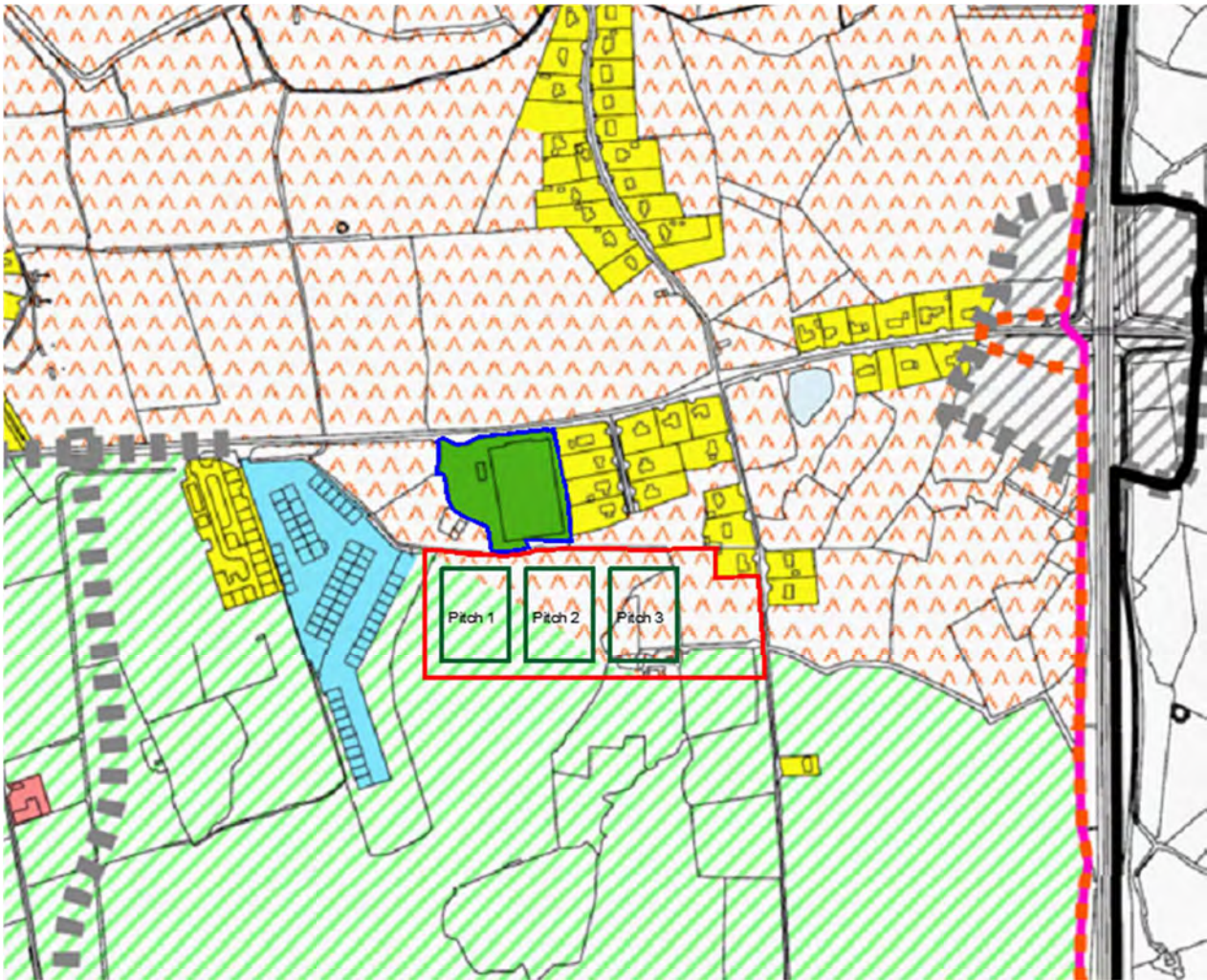


Figure 4 – Proposed zoning as per Draft Plan

The majority of the existing facility lies outside Flood Risk A. The subject land is identified as being included in Flood Risk Zone A per the Draft Plan – See Figure 5.

The following proposed policies are deemed relevant to this submission

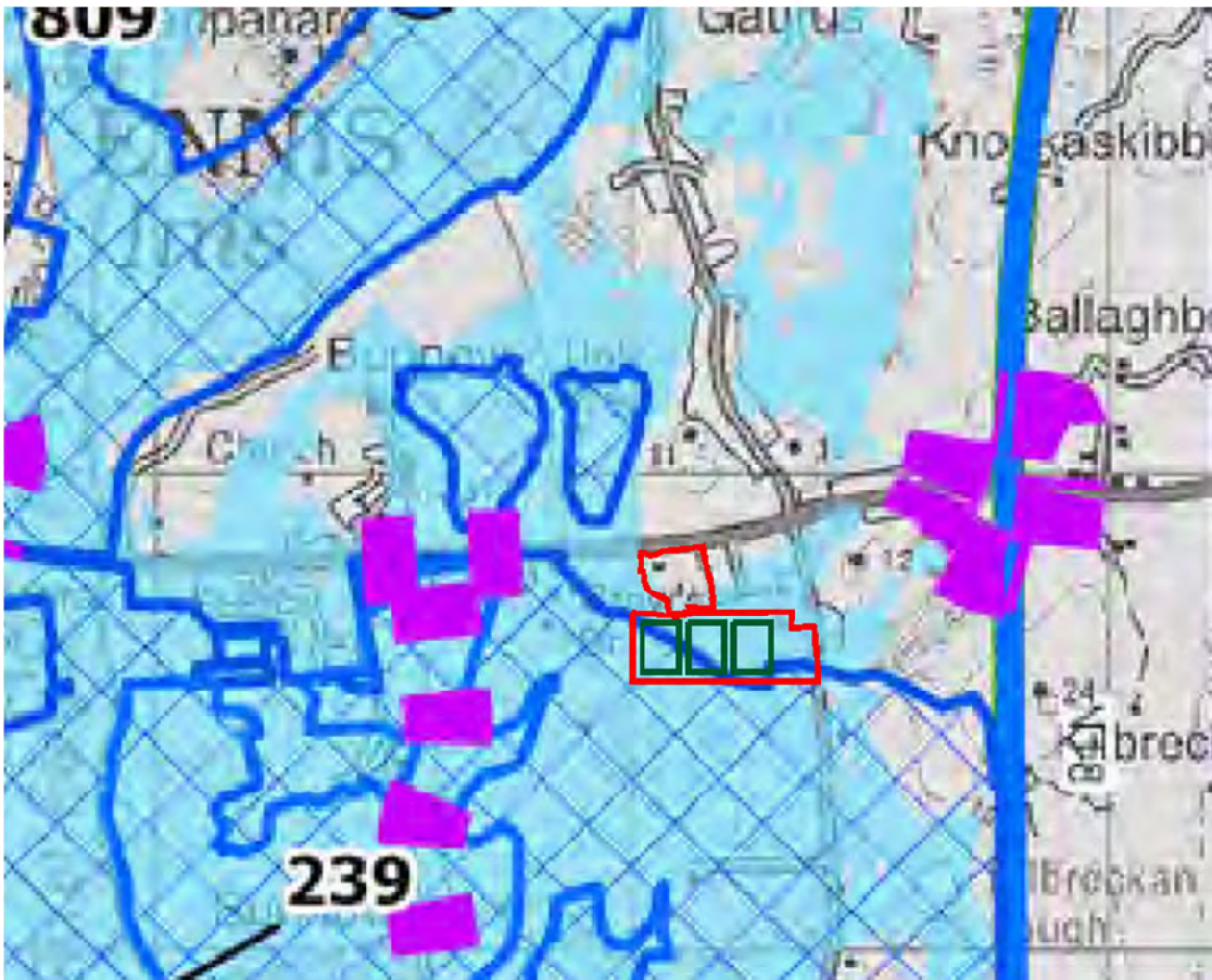


Figure 5 – Subject Site within Flood Risk A

The following proposed policies are deemed relevant to this submission

“CDP2.6 – Flood Risk Assessment and Management

It is an objective of Clare County Council:

- a) To ensure development proposals have regard to the requirements of the SFRA and Flood Risk Management Guidelines; and where required are supported by an appropriately detailed hydrological assessment / flood risk assessment.*
- b) To ensure that flood risk assessments include consideration of potential impacts of flooding arising from climate change including sea level rise and coastal erosion;*
- c) To integrate sustainable water management solutions, prioritising nature based solutions (such as SUDS, nonporous surfacing and green roofs) into development proposals;*
- d) To include Natural Water Retention Measures (NWRMS) where appropriate in consultation with the Office of Public Works (OPW) and other relevant stakeholders;*
- e) To support investment in the sustainable development of capital works under the Flood Capital Investment Programme and Flood Risk Management Plans developed under the Catchment Flood Risk Assessment and Management (CFRAM) process; and*



- f) *To ensure that potential future flood information obtained/generated through the Development Management process is used to inform suitable adaptation requirements in line with the Guidelines for Planning Authorities on Flood Risk Management (DoECLG & OPW, 2009).*

“CDP10.10 – Physical Recreation and Active Living

It is an objective of Clare County Council:

- a) *To support the implementation of the National Sports Policy 2018-2027 (both the vision and objectives), the National Sports Capital Programme, the Healthy Ireland initiative, the National Physical Activity Plan and the Healthy Clare Strategic Plan 2019-2021 and any subsequent policies, strategies, plans or programmes;*
- b) *To promote Active Living as a means of enhancing health, wellbeing and social inclusion; c) To work with local community groups to support and expand the Slí na Sláinte network in County Clare, in compliance with all relevant legislation;*
- c) *To work with Clare Sports Partnership, local communities, clubs and relevant bodies to support local groups that promote/organise walking, cycling and other recreational activities and to increase sport and physical activity participation in the County;*
- d) *To support the coordinated development of new indoor and outdoor recreational facilities in County Clare, based on need;*
- e) *To support investment in the sustainable development of larger sports projects in the region under the Large-Scale Sports Infrastructure Fund;*
- f) *To work in coordination with all relevant stakeholders to ensure that the necessary facilities and infrastructure are in place to support Active Living and increased levels of physical recreation;*
- g) *To support the development of cycle-parking facilities at appropriate locations in all urban areas in the County;*
- h) *To ensure that new recreation facilities/amenities are based on the principles of sustainable development and incorporate efficient heating systems, lighting etc;*
- i) *To ensure that sufficient lands are zoned for recreational uses to meet the needs of the projected population during the lifetime of this Plan; and*
- j) *To ensure that future development, zoning or recreational facilities are in compliance with all relevant legislation as outlined in Objective CDP3.1”*

5.0 REQUESTED AMENDMENT

Re classify part of 'Buffer Space' and 'Agriculture' lands to 'Recreation' use. This proposed amendment is outlined in Figure 6 below.

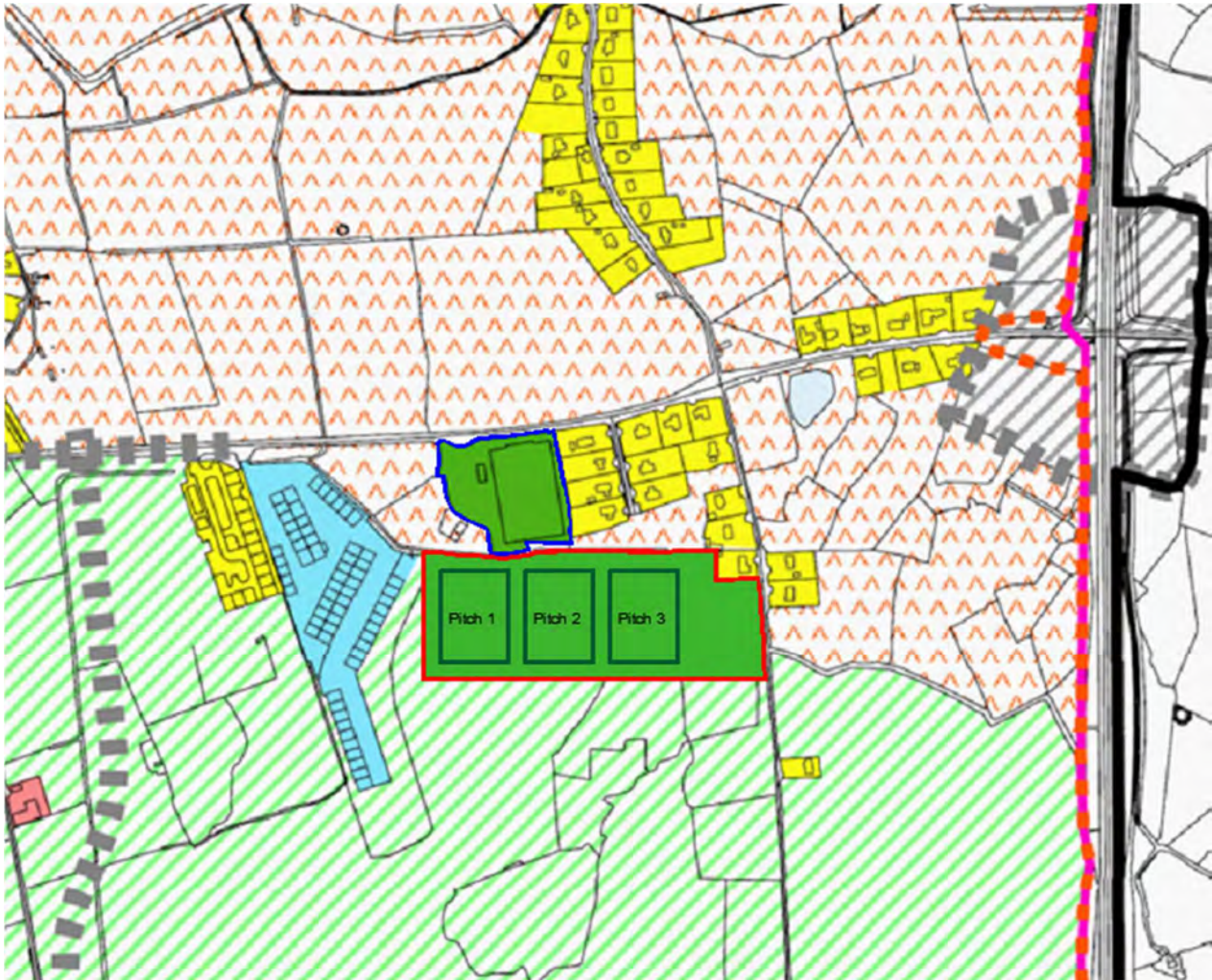


Figure 6 –Zoning Request Amendment –

5.1 Principle of Proposal

The provision of recreation and amenity facilities is an important aspect of delivering sustainable communities. It is crucial that the facilities provided cater for all age groups and are accessible by all. The role that good quality recreation and amenity facilities can play ensuring a healthy and active community is recognised in the Draft Plan.

The CDSL believe that the County possess some of the finest countryside in which to pursue outdoor recreational pursuits. Recreational opportunities are some of the County’s greatest assets and are seen by our Client not just as an enrichment of the lives of the County’s existing residents, but also as a potential to draw new residents, visitors and tourists. Figure 7 below shows a draft layout for the provision of three new pitches on the subject site overlaid onto the proposed zoning map for Ennis in the Draft Plan which shows the extent of the ‘Buffer Space’ and ‘Agriculture’ lands to be rezoned. Our Client requests that the Draft Plan provide for the expansion of the existing CDSL pitch facility at Ballaghboy, Doora, Ennis subject to the protection of the environment, health, safety and traffic issues to provide for three new pitches for their sports facility.

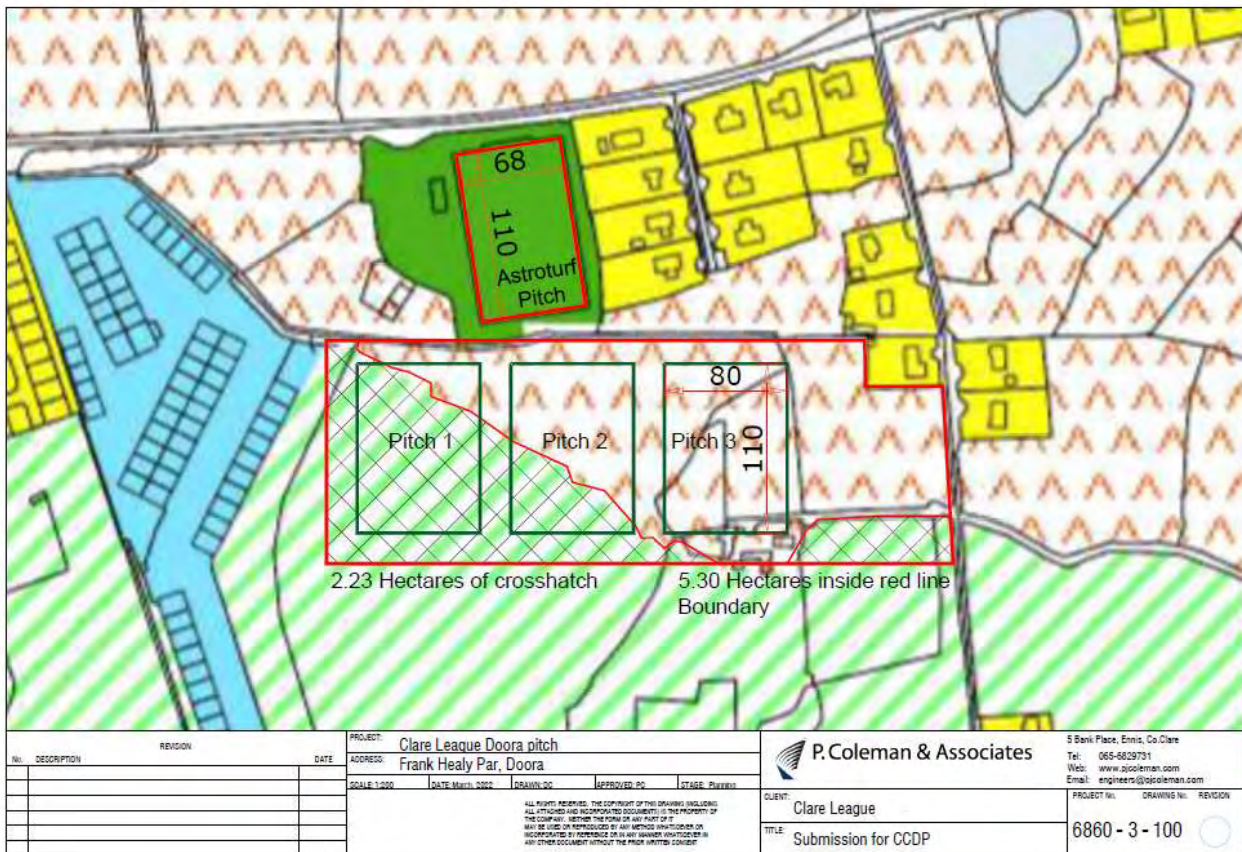


Figure 7 – Proposed layout for 3 new pitches – Option A

5.2 Flooding

The subject land is classified as being within an area identified as Flood Risk A. We refer to the High Probability Flood Map (OPW) in Figure 8 below which shows any risk of flooding to the subject site is very minor.

The Guidelines on Flood Risk state in relation to Flood Risk A lands

“Most types of development would be considered inappropriate in this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone”.

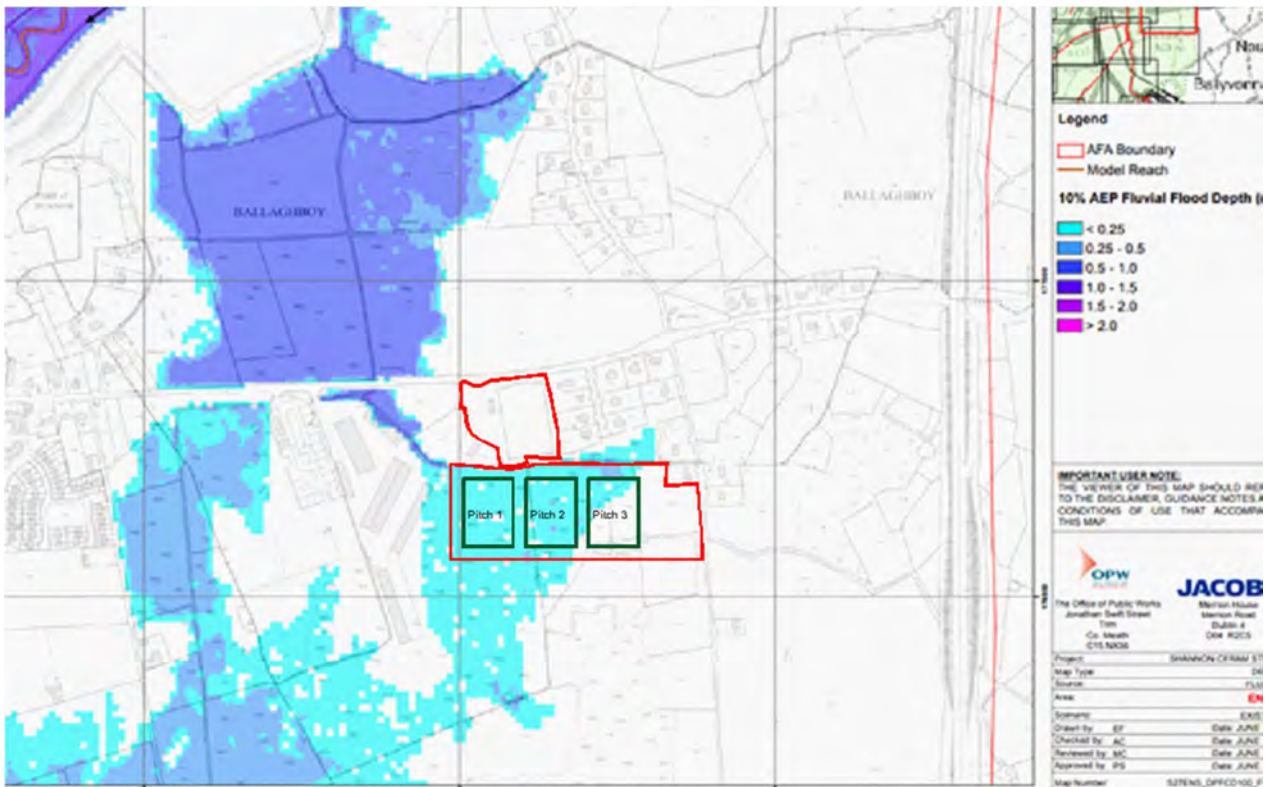


Figure 8 OPW High Probability Flood Risk Map

We submit that the proposed zoning for ‘Recreation’ use to provide for three new pitches is considered appropriate under Flood Risk A lands.

5.3 Alternative Options

Our Clients will accept a smaller area to be rezoned for 'Recreation' use to facilitate the provision of two pitches if this is considered more appropriate – see proposal for two no. pitches provided in Figures 8 and 9 below.

Option B – two x 90 x 110m size pitches (Figure 9)

Option C - two x 80 x 100m. size pitches (Figure 10)

The provision of two no. pitches instead of three pitches would reduce the amount of 'Buffer Space' and 'Agriculture' zoned areas to be rezoned for 'Recreational'.

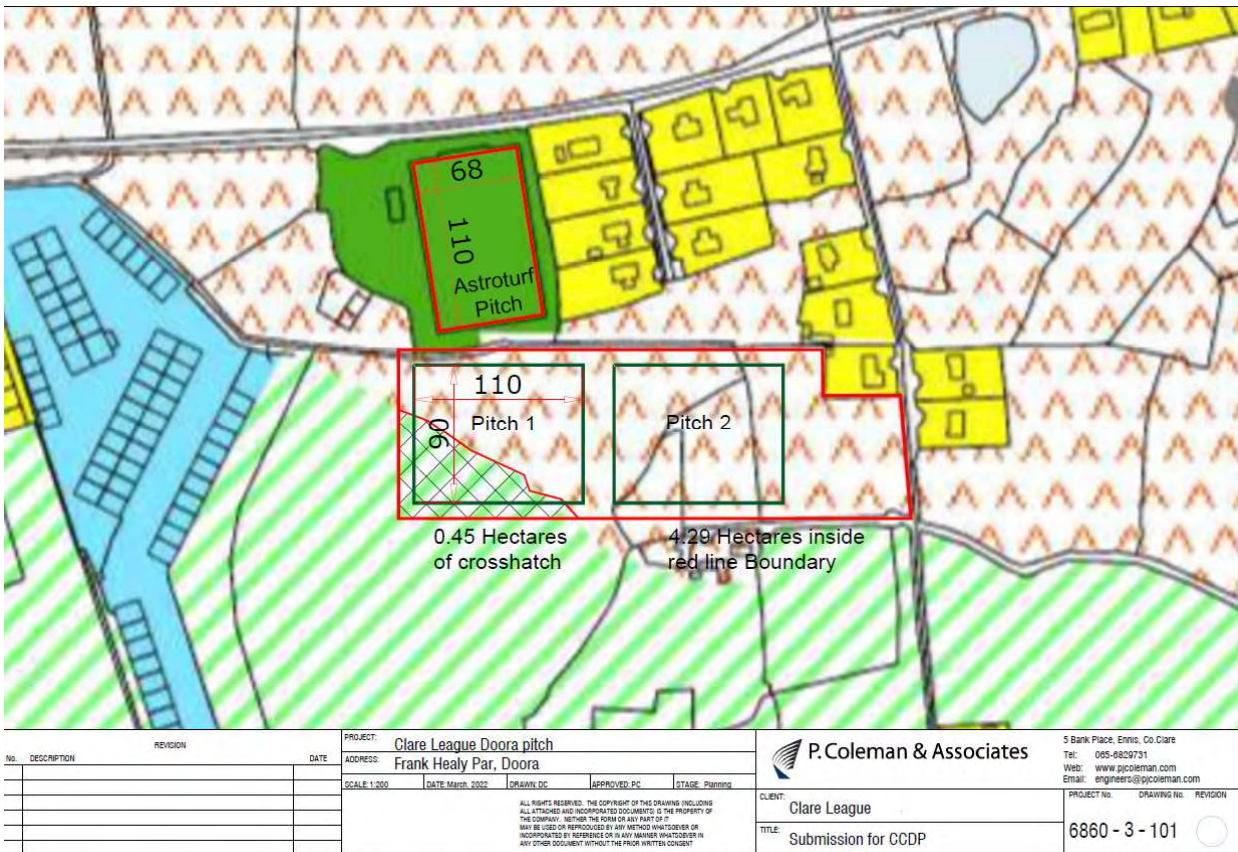


Figure 9 – Option B for two pitches (90 x 110m.)

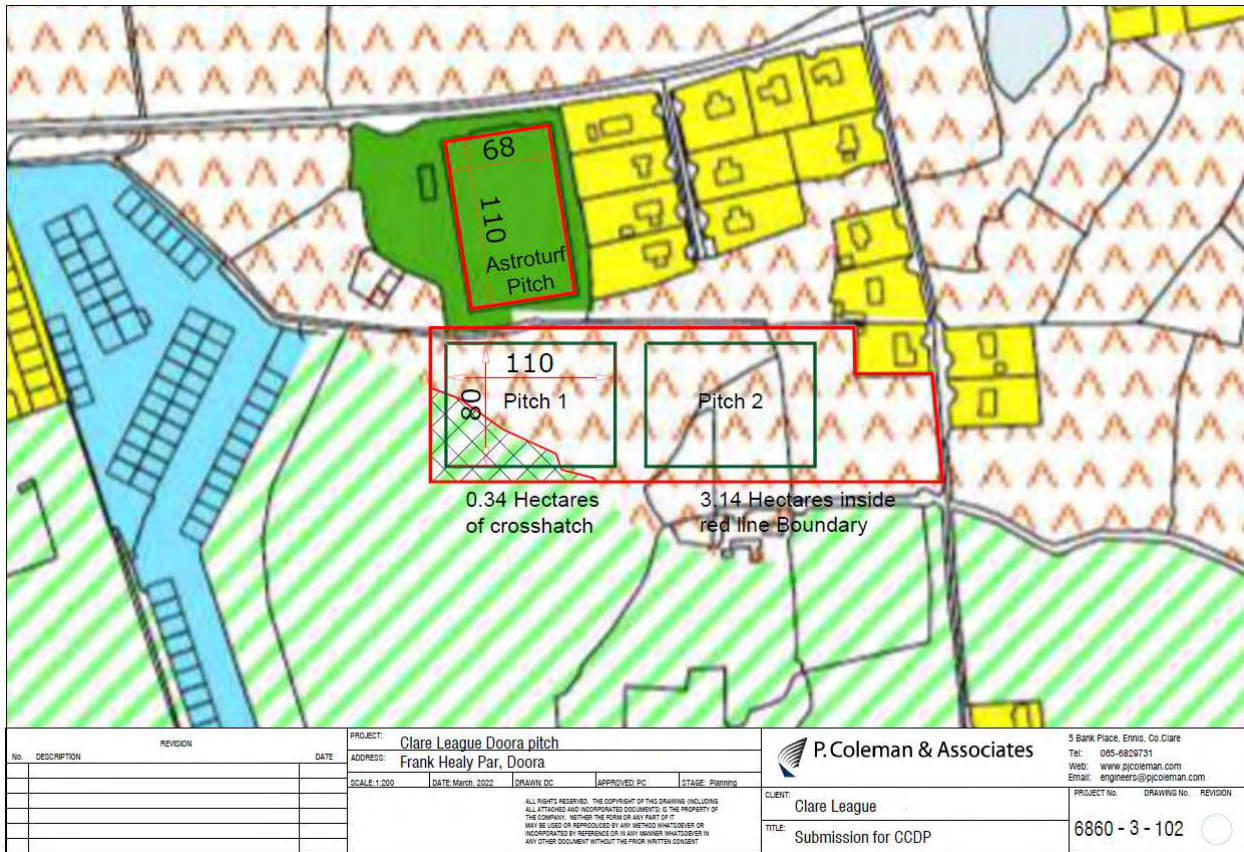


Figure 10 – Option C for two pitches (80 x 110m.)

6.0 CONCLUSION

Our Client requests that the subject site be rezoned to ‘Recreation’ to facilitate the provision of 3 new pitches (preferred option) as outlined in Figure 7 of this submission. Our Client is willing to accept a smaller area of ‘Recreation’ zoning to provide for two pitches which would reduce the amount of ‘Buffer Space’ and ‘Agriculture’ zoning to be rezoned.

Our Clients request that the Planning Authority kindly consider and adopt their preferred Option above submission in the preparation of the Clare County Development Plan 2023-2029.