

**Rafarilla Ltd
Station Road
Ennis
Co. Clare**

Submission Ref: S3-055

Planning Department
Clare County Council
New Road
Ennis
Co. Clare
V95 DXP2
By email: devplan@clarecoco.ie

22nd December 2022

**Re: Proposed Amendments to the Draft Clare County
Development Plan 2023-2029**

On Behalf Of: Marram Properties Ltd

Dear Sir / Madam,

I write in relation to the Proposed Material Amendments to the Draft Clare County Development Plan 2023-2029 and wish to make a submission in that context. This follows the submission made on our behalf by KPMG Future Analytics (ref: S2/822) to the Draft County Development Plan which outlined how, in order to maintain Ennis's status as a regional driver in a sub-regional context, it is imperative that future growth be accommodated and that a sufficient supply of housing be delivered in a timely fashion. The submission further demonstrated that if recent historic trends of inactivity in housing delivery on residential zoned lands in Ennis are permitted to continue over the course of the new Plan, there is a realistic risk that the projected population growth for the area will be unable to be accommodated within the settlement boundary. This in turn could jeopardise Ennis' status as a Key Town and hinder the ambitions for the consolidated and expanded growth of the town.

It remains our submission that the subject lands present a tangible opportunity to deliver upon local, regional and national aspirations for Ennis and ensure housing targets are achieved. These lands, which benefit from a contained and single entity ownership structure and are ready to come forward for development in the short to medium term to immediately relieve existing pressures on an already constrained local housing market, are recognised for their suitability and appropriately rezoned for residential development in that context.

Introduction / Site Context

As outlined in my previous submission to the Draft CDP, and as indicated in Figure 1.1 below, the subject lands (approximately 7.15ha) are strategically located to the south of the Ennis settlement centre, south of the N85 and west of Clare Road offering excellent connectivity opportunities. The lands are advantageously positioned in terms of their proximity to Ennis town centre. The site further benefits from its contained and coherent landholding owned by a single-party and adjoins an established residential setting further highlighting the opportunity to tie with an existing residential community. It should also be reiterated that the site's single party ownership offers a degree of certainty in terms of development intent for the lands and presents a viable opportunity to deliver an integrated plan led development response to currently underutilised lands.



Figure 1.1: *Indicative extent of subject lands*

Proposed Material Amendment

Whilst it is regrettable that the Chief Executive, in their report on the submissions made to the Draft Plan, recommended that no amendment be made to the Draft Plan, we welcome the intention of the Authority to permit residential development on the lands through the inclusion of the **SR6 Ennis Road, Clarecastle** objective and the rezoning of part of the lands to Strategic Residential Reserve as outlined in Figure 1.3 below. This decision acknowledges the suitability of these lands for development with

strong potential to deliver housing in close proximity to community and recreational infrastructure including the GAA pitches and the Clarecastle People's Park.

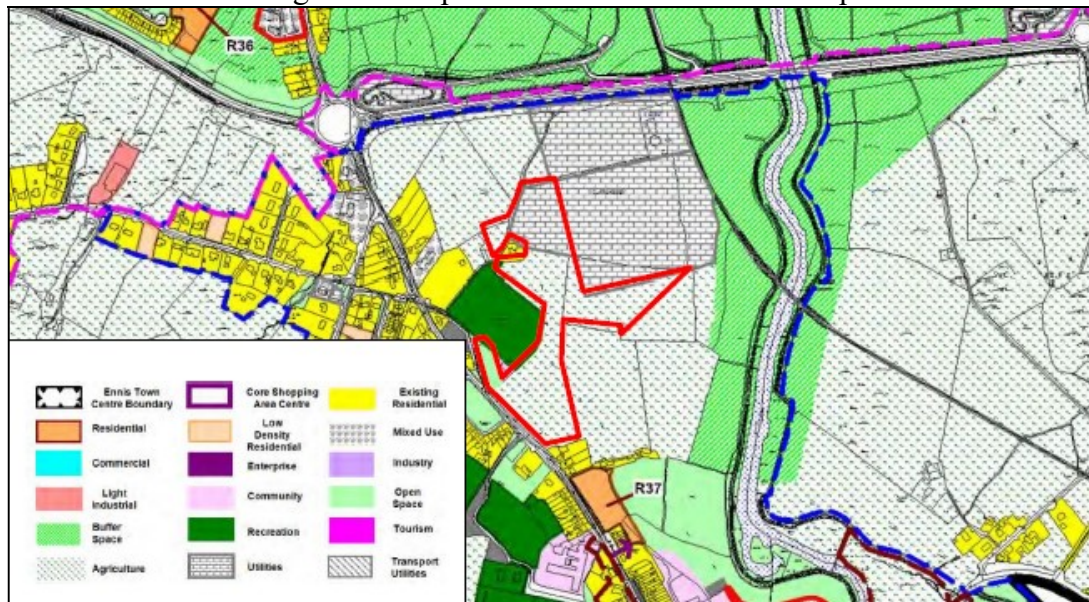


Figure 1.2 Zoning Proposed by the Draft Clare County Development Plan 2023-2029

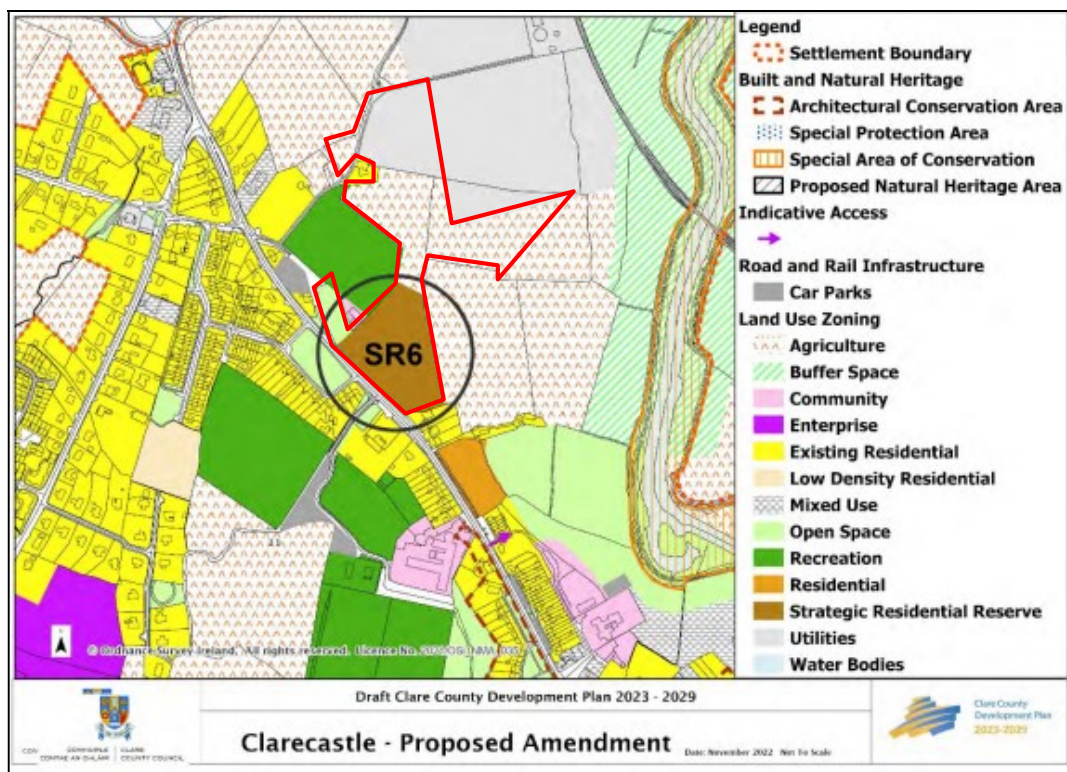


Figure 1.2 Proposed Amendment to the Draft Clare County Development Plan 2023-2029

SR6 recognises that these lands may be brought forward for development proposals but must accord with the requirements of CDP19.2 and the description of Strategic Residential Reserve. CDP19.2 states that:

CDP19.2: “It is an objective of Clare County Council: To ensure that sufficient lands are zoned at appropriate locations in the settlement plans and local area plans of the County, in accordance with the Core Strategy population and housing targets, in order to meet the envisaged land use requirements of the area during the lifetime of this development plan.”

We respectfully submit that the proposed Material Amendments represent a missed opportunity in realising the potential of the subject lands to accommodate residential development in the short to medium term and ensure the strategic vision for the

growth of Ennis can be delivered upon. Rezoning part of the lands to Strategic Residential Reserve will result limit their development potential during the Plan period and generate an unnecessary degree of uncertainty regarding our future intent for the lands.

Whilst we welcome the recognition that there may be some scope to release SRR zoned lands if residential zoned land is not being brought forward for development, a genuine and realistic risk outlined in our previous submission (informed by historic trends of continued inactivity in housing development), we remain concerned that Ennis' population growth will not be accommodated and its status as a Key Town will be in jeopardy.

Furthermore, the accessible nature of the lands with direct linkages to Shannon presents an opportunity for additional growth and should be considered in the context of the Authority's plans to develop Clarecastle Quay into a riverside walking and cycling facility, as outlined in the Draft County Development Plan. The plans to develop the Shannon Estuary have been published by the Shannon Estuary Economic Taskforce in their Interim Report which again offers an opportunity for the subject lands to accommodate development that would benefit from this significant Government investment in the Region.

We wish to reaffirm our commitment to realising the vision for Ennis through the successful delivery of a high-quality residential led development on these lands, respecting national standards with regard to density, height and overall integration with neighbouring land uses, services, and facilities. We continue to articulate that a viable opportunity exists to transform these lands from the current underutilised state and provide a vibrant new residential led development that will complement and enhance the existing offering in the settlement core.

I welcome the opportunity to continue engaging with Clare County Council in realising the full potential of these lands.

Yours sincerely,

A handwritten signature in cursive script, reading "Frances Mc Carthy", is written over a horizontal line.