



Submission Ref: S3-028

Forward Planning
Clare County Council
New Road
Ennis
Co. Clare

Our Ref: 200809
Your Ref: S2/802 &
R20

20th December 2022

Re: Submission on Material Amendments to Draft Clare County Development Plan 2023-2029 – Lands at Ballybeg on behalf of the Flanagan and Courtney Families

Dear Sir/Madam,

On behalf of our clients, the Flanagan and Courtney Families, we wish to make a submission in respect of the Material Amendments to the Draft Clare County Development Plan 2023-2029. Clare County Council will note that we made a submission on behalf of our clients at the Draft Development Plan Stage (Ref: S2/802) relating to lands in their ownership at Ballybeg, Ennis.

The submission requested that lands in our client's ownership be zoned for residential development in the adopted County Development Plan and provided an extensive justification in relation to same as well as an ecological assessment.

It is noted that amendment R20 of *Volume 3A- Ennis Municipal District* of the Material Amendments (Page 115) proposes to zone a portion of the subject lands for Residential Development (as per Figure 1 below). This proposed amendment is welcomed by our clients, and we respectfully request that it is included in the adopted Clare County Development Plan 2023-2029.

However, we would like to take this opportunity to request that the area outlined in red in Figure 2 below is also zoned for residential development in the adopted Clare County Development Plan 2023-2029. For completeness, we include below a summary of the rationale as to why the extended area warrants a residential land use zoning:

- The subject lands are located within the settlement boundary of Ennis town,
- There are several significant established multi- unit residential developments in the vicinity i.e. Rockmount Manor, Rockmount Grove, Silver Grove and Killone Grove,
- Road infrastructure and potential vehicular access locations are satisfactory and would accord with relevant development plan provisions,
- The lands benefit from excellent pedestrian connectivity to the surrounding area,
- The lands are located adjacent to the Rocky Road, a high-value amenity and pedestrian route in its own right,
- There are a range of amenities and community facilities located within easy walking distance of the subject lands,



- The lands benefit from proximity to services i.e., water and sewer and these connection points are located immediately adjacent to the site on the Ballybeg Road.
- A comprehensive ecological assessment which is based on bat survey work has been carried out to identify areas that are suitable for development and those which are not. This has determined the extent of the site suitable for development,
- As a result of this ecological assessment, a range of ecological mitigation measures have been identified which could form part of any future site-specific zoning objective for the subject lands,
- The Core Strategy set out in the Draft Clare County Development Plan identifies a very significant requirement for new homes in Ennis over the lifetime of the Development Plan,
- It is considered that there is a spatial imbalance in the location of new lands identified for residential development in the Draft Development Plan. No new development is identified in the neighbourhood of Ballybeg despite the presence of recently upgraded road and pedestrian infrastructure, services and the proximity of the area to a wide range of high-quality amenity and community facilities,
- Residential development at this location will consolidate existing residential development in the area and help contribute to the compact growth of Ennis,
- The lands are located a short distance to the north-west of the Roche Opportunity Site/Transformational site (OP19/Ts7) in Clarecastle which is designated in the draft plan as being suitable for employment generating development. The future development of this brownfield site will lead to an increase in demand for housing in the area and it is considered that the subject lands will facilitate this increase in demand.
- Residential development at this location would accord with National and Regional policy objectives and the criteria for zoning lands for residential development set out in the *Development Plans: Guidelines for Planning Authorities 2022*.

In addition to the points set out above, while the proposed zoning identified in the Material Amendments is welcomed, it results in a residual parcel of zoned land which is irregular in shape/extent. It is envisaged that the subject site will ultimately deliver a multi-unit residential development. The shape/extent of the site as proposed in the material amendments would not be conducive to accommodating an efficient and coherent residential layout with the associated requirement to facilitate an access road and a hierarchy of public open spaces. An increase in the site area (to incorporate the area outlined in Figure 2 below) would facilitate the delivery of a more coherent residential layout thereby allowing for the sustainable and beneficial development of the subject lands.

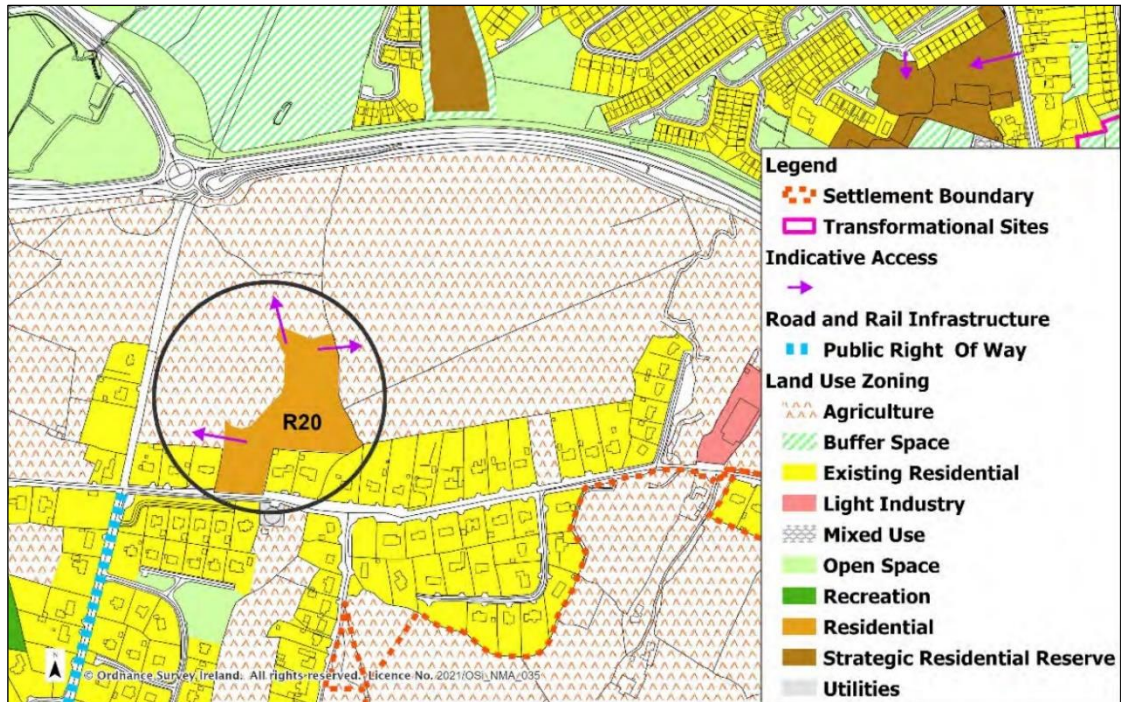


Figure 1 - Material Amendment

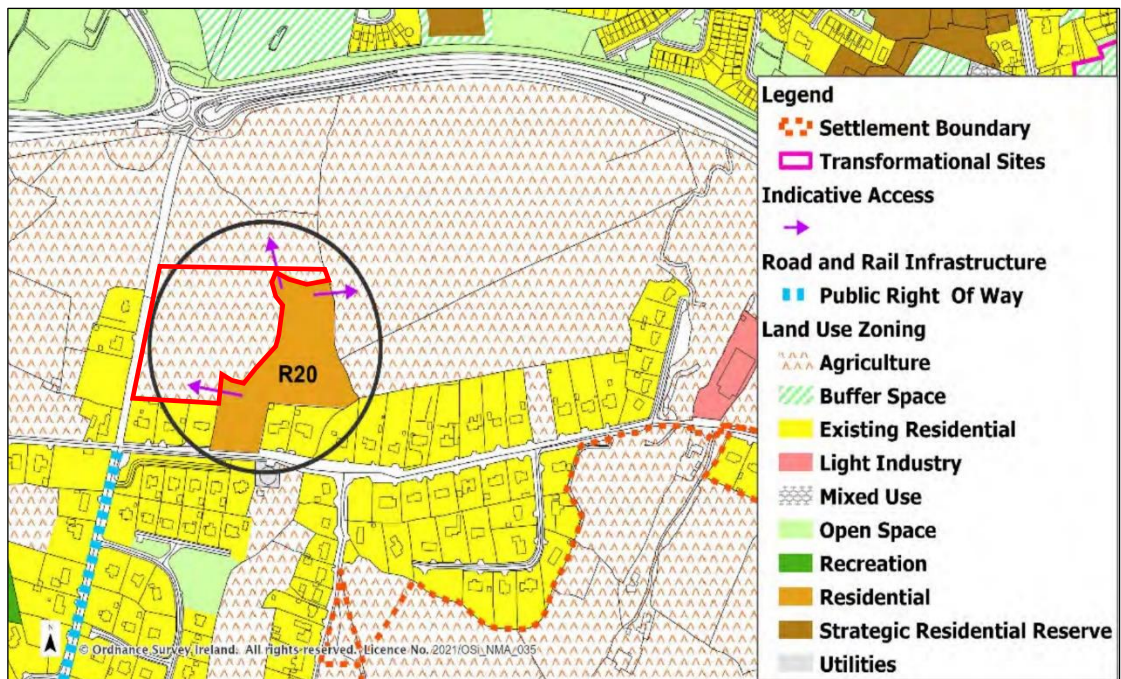
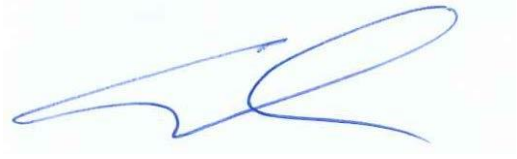


Figure 2 - Amendments Submission (Submission Area outlined in Red)

On behalf of our clients, the Flanagan and Courtney Families, we respectfully request that the proposed R20 residential land use zoning is extended to include the area identified in red in Figure 2 above in the adopted Clare County Development Plan. We trust that the content of this submission will be given due consideration in the preparation of the Plan.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'SM', is centered below the closing. The signature is fluid and cursive, with a large loop at the end.

Sean McCarthy BSc. (Hons) MURP MRTPI
Senior Planner
McCarthy Keville O'Sullivan Ltd.