

# **SUBMISSION TO PROPOSED AMENDMENT TO DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029**

**Lands at Drehidnagower, Lifford, Ennis**

**Submission Ref: S2.857**

McGann Family

Issue: A

Customer Project Number: 4994

Customer Document Number:

## Document Sign Off

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| CURRENT ISSUE |                                  |  |          |               |                                 |
|---------------|----------------------------------|--|----------|---------------|---------------------------------|
| Issue No: A   | Date: 31.12.22                   | Reason for issue: Submission to Proposed Amendments 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     | <b>Authorised Electronically</b> |  |          |               |                                 |
| Date          | 31.12.22                         | 31.12.22   |          | 31.12.22      |                                 |

| PREVIOUS ISSUES |      |            |         |          |          |          |                  |
|-----------------|------|------------|---------|----------|----------|----------|------------------|
| Issue No        | Date | Originator | Checker | Reviewer | Approver | Customer | Reason for issue |
|                 |      |            |         |          |          |          |                  |
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## 1.0 INTRODUCTION

P. Coleman & Associates, Architects, Engineers and Planners have been appointed by the McGann Family to make a submission to the Proposed Amendments to the Draft Clare County Development Plan 2023-2029 (the Draft Plan). There are two requests being made as part of this submission as follows:-

1. Submission to the Written Statement – Volume 1.
2. Submission to Ennis Municipal District Plan – Volume 3a

Our Clients lodged a submission to the Draft Plan, Submission Ref: S2.857, which requested that the subject site at Drehidnagower, Lifford Ennis which was proposed to be zoned as ‘Open Space’ & ‘Existing Residential’ would be rezoned to ‘Low Density Residential’ or as an alternative option ‘Existing Residential’.

## 2.0 PROPOSED AMENDMENTS TO THE DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

### 2.1 Written Statement – Volume 1

We note from the Land use Zoning Matrix in the Amendments to the Draft Plan that the provision of a Single Residential Dwelling for Permanent Occupation is proposed to be changed from being ‘Open to Consideration’ to ‘Will not normally be acceptable’ under the ‘Existing Residential’ land use. See screenshot from Zoning Matrix Table in Figure 1 below.

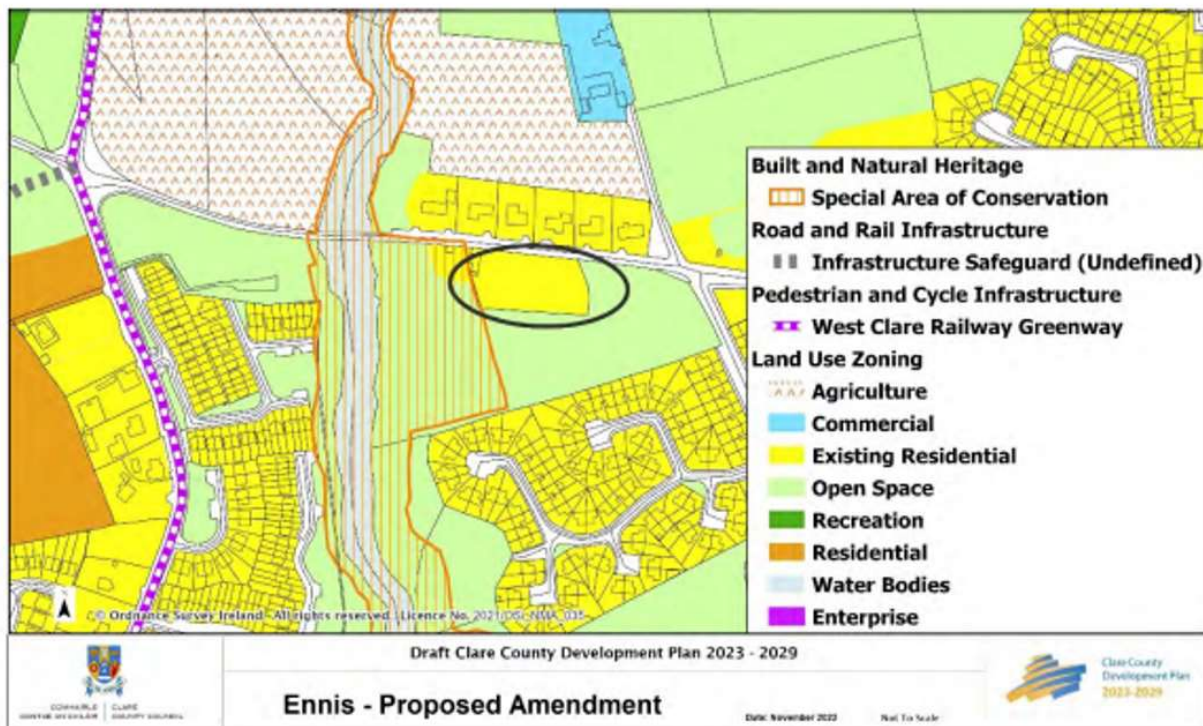
| Land Use   | Mixed Use      | Existing residential | Residential  | Low Density Residential | Commercial   | Community | Recreation | Open Space | Buffer Space | Enterprise | Tourism | Industry | Light Industry | Maritime / Harbour | Agriculture | Marine Related Industry |
|--|----------------|----------------------|--------------|-------------------------|--------------|-----------|------------|------------|--------------|------------|---------|----------|----------------|--------------------|-------------|-------------------------|
| Playing pitches  | 0              | <del>X</del>         | <del>X</del> | <del>X</del>            | 0            | ✓         | ✓          | 0          | X            | X          | X       | X        | 0              | X                  | ✓           | X                       |
| Primary Care Facility  | ✓              | <del>X</del>         | <del>X</del> | <del>X</del>            | 0            | 0         | X          | X          | X            | 0          | X       | X        | X              | X                  | X           | X                       |
| Refuse Landfill  | X              | X                    | X            | X                       | X            | X         | X          | X          | X            | X          | X       | 0        | X              | X                  | X           | X                       |
| Religious Places of Worship                                      | 0              | 0                    | <del>X</del> | X                       | X            | ✓         | X          | X          | X            | X          | X       | X        | X              | X                  | 0           | X                       |
| Research and development   | 0              | X                    | X            | X                       | <del>X</del> | X         | X          | X          | X            | ✓          | X       | 0        | 0              | X                  | X           | 0                       |
| Residential – single dwelling (Permanent Occupation)             | ✓              | <del>X</del>         | <del>0</del> | ✓                       | X            | 0         | X          | X          | X            | X          | X       | X        | X              | <del>X</del>       | 0           | X                       |
| Residential – single dwelling (short-term tourist accommodation) | 0              | 0                    | 0            | 0                       | X            | X         | X          | X          | X            | X          | 0       | X        | X              | 0                  | X           | X                       |
| Residential Institution  | 0              | 0                    | 0            | 0                       | 0            | 0         | X          | X          | X            | X          | X       | X        | X              | X                  | X           | X                       |
| Restaurant/Café  | <del>X</del> ✓ | X                    | X            | X                       | ✓            | X         | 0          | X          | X            | 0          | ✓       | 0        | 0              | 0                  | X           | X                       |
| Retail Warehousing   | 0              | X                    | X            | X                       | 0            | X         | X          | X          | X            | X          | X       | X        | X              | X                  | X           | X                       |
| School / College   | 0              | X                    | <del>X</del> | <del>X</del>            | ✓            | ✓         | X          | X          | X            | ✓          | X       | X        | X              | X                  | X           | X                       |
| Science & Technology Based Enterprise                            | ✓              | X                    | X            | X                       | 0            | X         | X          | X          | X            | ✓          | X       | 0        | 0              | X                  | X           | X                       |
| Scrap Yard   | X              | X                    | X            | X                       | X            | X         | X          | X          | X            | X          | X       | 0        | 0              | X                  | X           | X                       |
| Shops (excluding Retail)   | ✓              | 0                    | <del>X</del> | <del>X</del>            | ✓            | 0         | X          | X          | X            | 0          | 0       | X        | 0              | 0                  | X           | X                       |

**Figure 1 – Land Use Zoning Matrix with change proposed to Single Residential Dwelling under ‘Existing Residential’ zoning**

We note also in the same matrix that *‘Multiple Residential units’* and *‘Residential - Single Dwelling (short-term tourist accommodation)’* are both *‘Open to Consideration’*. This appears to be at variance with Land Use of *‘Residential – Single Dwelling (Permanent Occupation)’*.

## 2.2 Ennis Municipal District Plan – Volume 3a.

We note from the Proposed Amendments to the Draft Plan that our Clients submission request has been accepted and the subject site is proposed to be rezoned to *‘Existing Residential’*.



**Figure 1 – Proposed rezoning to *‘Existing Residential’* as per Proposed Amendments to Draft Plan.**



### 3.0 SUBMISSION

#### 3.0 SUBMISSION TO PROPOSED AMENDMENTS TO DRAFT PLAN

##### 3.1 Submission Request No. 1

Our Clients are requesting that the proposed change in the Land Use Zoning Matrix in relation to the provision of a *'Residential - Single Dwelling (Permanent Occupation)'* which is proposed to be changed from being *'Open to Consideration'* to *'Will not normally be acceptable'* under the *'Existing Residential'* land use will not be adopted in the Final Clare County Development Plan 2023-2029 and that this land use will revert back to being *'Open to Consideration'*.

We note that the provision of *'Multiple Residential Units'* and *'Residential - Single Dwelling (short-term tourist accommodation)'* will remain *'Open for Consideration'* and no change is proposed for these uses.

Our Clients submit that this proposed change to the zoning matrix is unreasonable. There are several vacant sites which are currently zoned and proposed to be zoned as *'Existing Residential'* in urban areas many of which are infill in nature or consist of left-over pieces of ground or they consist of large plots which form part of existing residential properties and which are ideally suited to the provision of a single residential dwelling particularly having regard to the nature of the adjoining residential land uses. Multiple residential units may not be suitable on these sites either because of the limited size of the site, site suitability and/or the existing pattern of development in the area and some may not be suited to a single residential unit for short-term tourist accommodation due the location. The provision of a single residential dwelling for permanent occupation on these sites would help alleviate the housing shortage as well as reduce the demand for one off housing in the countryside by providing a more sustainable alternative though the infilling of a site within the urban margin and therefore should be deemed to be *'Open Consideration'*.

We note from the Proposed Amendments to the Draft Plan that several additional sites are proposed to be rezoned to *'Existing Residential'* with some of these only being suited to the provision of a single residential unit for permanent occupation. We note from our review of some of the submissions to the Draft Plan associated with sites of this nature that the purpose of the submission was to seek an *'Existing Residential'* zoning on the site so that a single dwelling house for permanent occupation could be provided. Some of these submissions have been accepted with these sites proposed to be zoned to *'Existing Residential'* in the Proposed Amendments to the Draft Plan. The change to this Land Use Zoning Matrix would prohibit these sites from being developed as a single residential unit for permanent occupation which would therefore negate the change in the zoning objective to *'Existing Residential'*.



Providing for a single residential dwelling for permanent occupation to be '*Open for Consideration*' will still require that any proposal for such use will be considered on its own merits and be subject to particular considerations such as compatibility with adjoining uses, scale or whether or not the proposal is prejudicial to the amenities or the residential amenities of an adjoining property etc. thus ensuring it will only be permitted if it is deemed to be in accordance with the proper planning and sustainable development of the area.

### **3.2 Submission Request No. 2**

Our Clients confirm their support for the proposed change in the zoning of the subject site from '*Open Space*' to '*Existing Residential*' and formally request Clare County Council to adopt this amendment in full in the final Clare County Development Plan 2023-2029.

We trust that the points raised in this submission will be duly considered by Clare County Council in its review of the Proposed Amendments to the Draft Plan.