

From: [REDACTED]
To: [Development Plan](#)
Cc: [REDACTED]
Subject: Submission to Variation No. 1 to the Clare County Development Plan 2023-2029
Date: Thursday 2 April 2026 15:33:21
Attachments: [REDACTED]

To whom it may concern,

Please find attached a submission on behalf of our client, The Courtney Family, on Proposed Variation No. 1 of the Clare Development Plan 2023-2029.

The submission relates to lands at Ballybeg, Ennis, Co. Clare.

Please confirm receipt by return email in due course.

Thank you

Kind Regards,

David Conway
Assistant Planner

Brock McClure
Planning & Development Consultants
63 York Road
Dún Laoghaire
Co. Dublin

www.brockmcclure.ie

E: david@brockmcclure.ie T: 01 514 3279



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**Brock
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PLANNING & DEVELOPMENT CONSULTANTS

63 York Road
Dun Laoghaire
Co. Dublin

www.brockmcclure.ie

Senior Executive Officer
Planning Department
Clare County Council
Áras Contae an Chláir
New Road
Ennis
Co. Clare
V95 DXP2

By Email: devplan@clarecoco.ie

2 April 2026

**Submission to Variation No. 1
of the Clare County Development Plan 2023-2029
for Lands at Ballybeg, Ennis, Co. Clare
on behalf of The Courtney Family**

Dear Sir/Madam,

We, **Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin**, on behalf of **The Courtney Family, [REDACTED]**, wish to make a submission in respect of the Proposed Variation No. 1 to the Clare County Development Plan 2023-2029. This submission is being made in advance of the prescribed deadline on 7 April 2026 and relates to the landholding outlined in Figure 1 of this letter at Ballybeg, Ennis, Co. Clare.

Our client generally welcomes the amendments put forward in the Proposed Variation and in particular the proposals for the alignment of the Clare County Development Plan 2023-2029 with the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025). In general terms, this variation is viewed as a positive step taken by Clare County Council in seeking to respond to the national call for the urgent delivery of housing. There is now a critical government mandate to ensure that provision is made for an appropriate quantum of zoned and serviced land to meet new housing targets published by the National Planning Framework First Revision (2025) and the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025).

While the Proposed Variation is a positive step in responding to the significantly increased housing targets arising from the National Planning Framework First Revision (2025) and the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025), it is considered that the approach taken does not go far enough in unlocking realistic, deliverable residential opportunities within key growth settlements such as Ennis with opportunities missed in the approach taken. The exclusion of the site at Ballybeg, Ennis, Co. Clare for residential development is one key example.

BACKGROUND TO THIS SUBMISSION

Our client previously engaged constructively with Clare County Council through the non-statutory process in December 2025 and submitted a detailed Planning Submission (Ref. No. Plan25S1-068) in respect of lands at Ballybeg in Ennis, the extent of which are outlined in Figure 1 below.



Figure 1 – Aerial view showing subject site to be rezoned for residential development (red) and overall landholding of our client (blue)

The applicant's submission during the non-statutory process is attached to this letter as the Appendix.

This submission set out a clear and considered proposal for the positive consideration of lands at Ballybeg to come forward as a new residential zoned site in response to the NPF Implementation Guidelines (2025). In short, it was presented that this site is serviced and provides for the logical extension of the local existing built-up area and is readily available for development. The site has good accessibility to local routes, amenities, neighbourhood and town centre services and public transport. The site is located in proximity to established schools, community amenities and essential services.

It is now a fundamental requirement that all sites equipped with the necessary infrastructure and services for residential development be released as part of this variation process. The subject lands are fully serviced and are available for immediate development.

The omission of these ready-to-go lands from the Proposed Variation as a newly zoned residential site is of serious concern. Therefore, we request the Planning Authority to revisit the potential this site has to offer.

In this regard, we respectfully request that the Council amend the proposed Variation to include the zoning of the lands at Ballybeg for residential development.



KEY CONSIDERATIONS

In finalising the proposed variation to the Development Plan, this submission specifically requests that the Planning Authority take the following points into consideration:-

Missed Opportunity in Ennis

Proposed Amendment No. 1 and No. 3 of the Variation are the particular focus of this submission.

Proposed Amendment No. 1 in particular seeks to release Strategic Residential Reserve lands and to zone additional lands for residential development in order to accelerate housing delivery in the short to medium term. Long Term Strategic and Sustainable Development sites are also identified to guide future growth beyond the current Development Plan period.

Proposed Amendment No. 3 sets out the framework for the new Ennis and Clarecastle Settlement Plan (new Volume 3a(i) of the Development Plan), including the identification of new residential zoned lands and Long Term Strategic Sustainable Development sites. Notwithstanding this, the lands at Ballybeg do not feature as either a newly zoned residential site or a Long Term Strategic Sustainable Development site, which represents a significant omission and a missed opportunity in the context of the stated objectives of the Variation. This is particularly concerning given the short, medium and long term potential this variation holds in terms of unlocking and earmarking key residential sites within the context of the key town of Ennis.

We note specifically that the Ballybeg lands are located within the established suburban area of Ennis, identified in the Clare County Development Plan 2023–2029 as the only Key Town in the county intended to accommodate the majority of future population and housing growth. The surrounding area comprises a mix of mature residential estates, including Rockmount Manor, Rockmount Grove, Silver Grove, Clonroad More, and Killone Grove, alongside long-established dwellings along Clonroadbeg Road. The lands form part of the consolidated urban fabric of Ennis and do not represent isolated or peripheral greenfield lands.

The subject lands also adjoin previously permitted residential developments under Reg. Refs. 04/2702 and 07/1779. While these permissions were not implemented, they clearly demonstrate that the Planning Authority has historically accepted the principle of residential development at this location, subject to the provision of infrastructure. The Ballybeg lands therefore represent a logical and sequential extension of the existing residential area and one of the few remaining sites of sufficient scale capable of delivering housing within the established urban boundary.

The lands are well positioned in terms of accessibility and connectivity, with direct access to Clonroadbeg Road and close proximity to Ennis town centre, schools, community facilities, and local services. This ensures that future development at this location would integrate effectively with the existing neighbourhood and support sustainable patterns of growth.

National policy explicitly requires local authorities to identify well-located, serviced, and deliverable lands to meet revised housing targets, including the provision of additional lands to ensure flexibility and certainty of delivery. In this regard, the Ballybeg lands represent a clear opportunity to contribute meaningfully to housing supply in Ennis, optimising the use of existing infrastructure and reducing pressure for development in less sustainable or more peripheral locations.

It is evident from a review of the Proposed Variation, and in particular the Ennis & Environs Settlement Map, that other lands – some located at a greater distance from the town centre and with less established integration into the urban fabric – have been prioritised for residential zoning. The omission of the Ballybeg lands in this context raises concerns regarding consistency in the application of zoning criteria.

Accordingly, the Planning Authority is requested to provide a clear rationale for the exclusion of the Ballybeg lands and to reconsider their inclusion as part of the zoning framework under Proposed Variation No. 1.



Consistency of Zoning Approach

A key concern arising from a review of Proposed Amendment No. 3 and the accompanying Ennis & Environs Settlement Plan relates to the apparent inconsistency in the application of zoning principles.

Notwithstanding the stated objective of the Proposed Variation to identify and zone appropriate lands for residential development, the Ballybeg lands have not been included as a newly zoned residential site. This omission is particularly notable given the characteristics of the subject lands and their clear suitability for residential development.

Of particular concern is the fact that lands directly adjoining our client's landholding have been rezoned for residential development under the Proposed Variation. These adjoining lands are materially similar in terms of location, context, servicing potential, and relationship to the surrounding built environment, forming part of the same overall land parcel in functional and planning terms. It is also noted that a small portion of the lands subject to this rezoning falls within our client's ownership. In this context, there is no reasonable or evidence-based justification for distinguishing between the two sites. They are in effect one and the same site and field.

Furthermore, ecological considerations, including bat foraging activity, have been identified in this area. However, such considerations would apply equally – if not more so – to the adjoining lands that have been rezoned. The decision to include those lands within the zoning framework, notwithstanding these constraints, further highlights the inconsistency in the treatment of the Ballybeg lands.

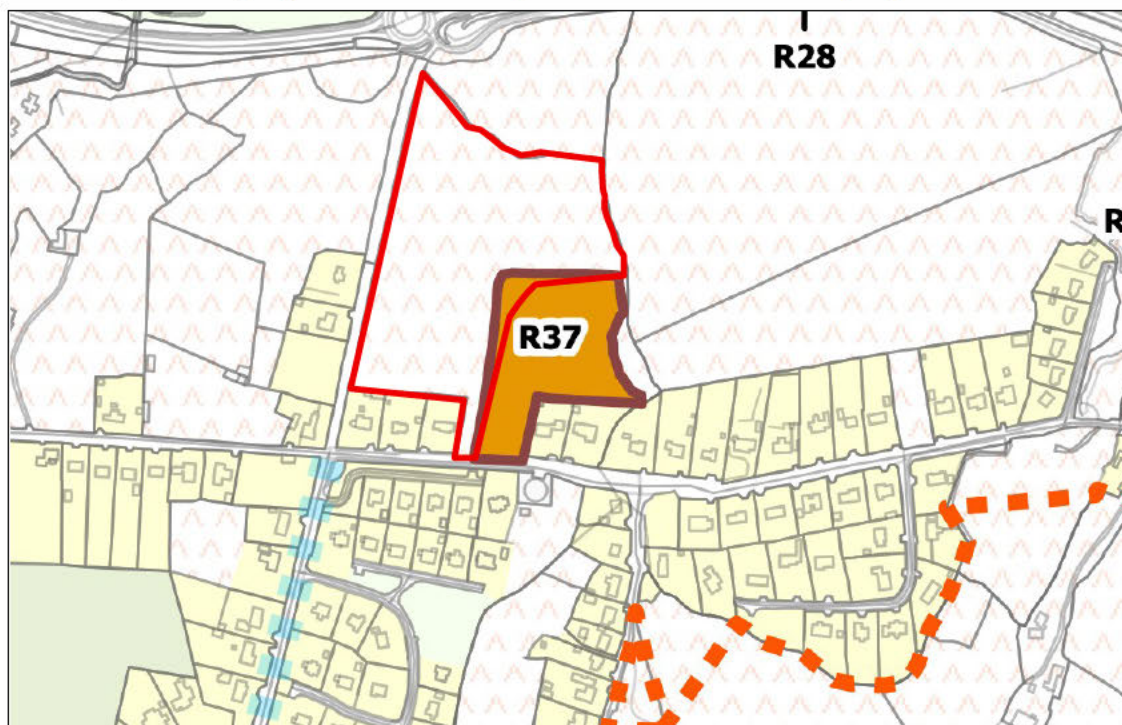


Figure 2 – Proposed Ennis & Environs Zoning Map, showing the subject site (outlined in red) and adjoining proposed rezoning

Map 2 of the Newhall and Edenvale Complex SAC [Site Code: 002091], as included in the Conservation Objectives Series, identifies potential foraging habitats (highlighted in green) associated with the SAC. A review of this mapping indicates that these areas are largely located outside the subject lands at Ballybeg.

The site (outlined in red) lies almost entirely outside the mapped potential foraging zones, indicating that it does not form part of the more sensitive ecological areas linked to the SAC. This suggests that the lands have limited ecological importance in terms of supporting SAC-related foraging activity.

Notwithstanding the above, potential impacts can be appropriately assessed and mitigated at project stage through the Appropriate Assessment process, in accordance with the EU Habitats Directive.



Accordingly, the available mapping does not provide a robust ecological basis for the exclusion of the Ballybeg lands from the proposed zoning framework.

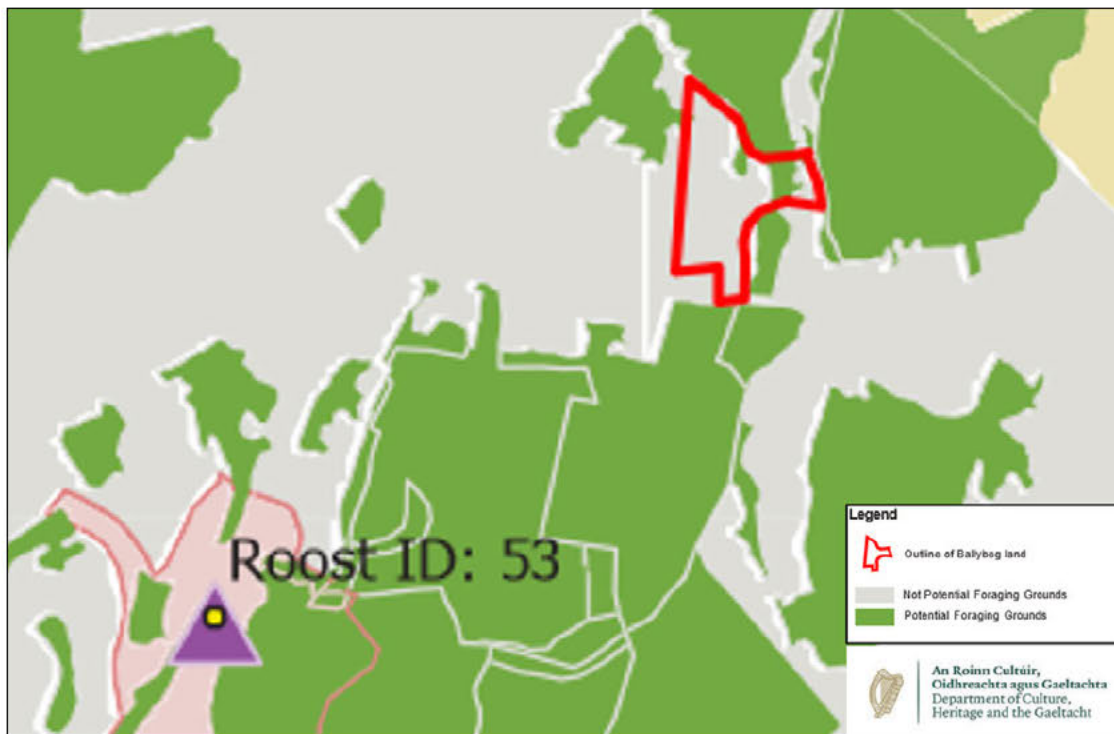


Figure 3 – Extract from Map 2 of the Newhall and Edenvale Complex SAC, showing the site outside potential foraging grounds

It is also evident from a review of the Proposed Variation, and in particular the Ennis & Environs Settlement Map, that other lands – some located at a comparable or greater distance from Ennis town centre and with less established integration into the urban fabric – have been prioritised for residential zoning, including lands identified as R22, R27, R36 and R44.

In contrast, the Ballybeg lands are well located within the established suburban area of Ennis and are directly adjacent to existing and permitted residential development, including established housing along Clonroadbeg Road. The subject site forms part of the consolidated urban fabric and represents a logical and sequential opportunity for residential development.

The subject lands therefore present a more immediate and appropriate opportunity for the consolidation of the existing urban area when compared to some of the more peripheral or less integrated sites included in the Proposed Variation.

In light of the above, the exclusion of the Ballybeg lands cannot reasonably be attributed to their location, accessibility, environmental characteristics, or relationship to the existing settlement structure. Rather, it points to an inconsistent and inequitable application of zoning criteria.

Accordingly, it is respectfully but firmly submitted that the Planning Authority should reconsider its position and include the Ballybeg lands within the zoning framework, in a manner consistent with the approach taken to adjoining and comparable lands under the Proposed Variation.

Purpose of Variation No. 1

One of the key objectives of Proposed Variation No. 1 is to ensure that the Clare County Development Plan 2023–2029 is aligned with the requirements of the Planning and Development Act 2000 (as amended), including Ministerial Guidelines issued under Section 28. In particular, the Variation seeks to give effect to the updated policy framework set out in the National Planning Framework First Revision (2025) and the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025), which emphasise the need for a plan-led approach to delivering sufficient, serviced, and

deliverable housing land.

In tandem with this, Proposed Amendment No. 3 to Volume 3 (Municipal District Settlement Plans) provides the primary mechanism for implementing these objectives at the local level. This includes the rezoning of Strategic Residential Reserve lands, the identification of additional lands for residential use, and the refinement of settlement strategies to ensure that housing delivery is directed to appropriate and sustainable locations.

In this context, the Variation must ensure not only the identification of future growth areas, but critically the inclusion of lands that are serviced, available, and capable of delivering housing within the lifetime of the Development Plan. The effectiveness of Proposed Amendments No. 1 and No. 3 is therefore dependent on the zoning of lands that can be activated in the short to medium term and that align with the principles of compact growth.

The Ballybeg lands represent a clear opportunity in this regard. The site is located within the established envelope of the settlement area for Ennis and forms a logical and sequential extension to the existing residential area. The lands are well integrated with the surrounding built environment, adjoining established residential estates and previously permitted development sites, thereby reinforcing their suitability for residential use.

The site benefits from direct access to Clonroadbeg Road and is in close proximity to Ennis town centre, as well as a range of established services and amenities including schools, childcare facilities, and community infrastructure. This ensures that future development at this location would support the creation of a sustainable and well-integrated neighbourhood, while promoting connectivity and reducing reliance on the private car.

Furthermore, the development of the Ballybeg lands would support the consolidation of the existing urban footprint of Ennis, consistent with compact growth objectives, while making efficient use of existing infrastructure and services. The lands represent one of the few remaining parcels of sufficient scale within the built-up area capable of delivering meaningful residential development in a coordinated manner.

Accordingly, the inclusion of the Ballybeg lands within the zoning framework would directly support the implementation of Proposed Amendments No. 1 and No. 3 by facilitating the delivery of housing on well-located, integrated, and serviceable lands. Their omission represents a missed opportunity to fully realise the stated objectives of the Variation and to ensure a robust and effective housing land supply in Ennis.

Compliance with Compact Growth and Settlement Strategy

The Ballybeg lands comprise a clearly defined and contiguous parcel that forms a logical and sequential extension to the built-up area of Ennis. The site is directly adjoined by established residential developments, including Rockmount Manor, Rockmount Grove, Silver Grove, Clonroad More, and Killone Grove, ensuring that development at this location would not represent isolated or leapfrogging growth into the rural hinterland. Instead, it would consolidate the existing urban form and contribute positively to the compact development of Ennis.

The lands represent one of the few remaining parcels of sufficient scale within the established suburban area capable of accommodating a coordinated residential scheme. An indicative layout demonstrates the potential to deliver a cohesive and well-integrated residential development, incorporating a mix of housing typologies, internal road networks, landscaped open spaces, and green infrastructure. Existing natural features, including boundary vegetation and woodland areas, can be retained and integrated into the development, enhancing biodiversity and contributing to the overall quality and character of the scheme.

The development of the Ballybeg lands would also provide an opportunity to strengthen permeability and connectivity within the area. Potential pedestrian and cycle linkages to adjoining residential estates and existing infrastructure along Clonroadbeg Road would promote active travel and improve accessibility to the wider town.



The site is located within close proximity to Ennis town centre, as well as a range of established services and amenities including schools, childcare facilities, community infrastructure, and recreational facilities. This level of accessibility supports reduced reliance on the private car and aligns with the creation of sustainable, inclusive, and well-connected neighbourhoods, consistent with the principles of compact growth.

In this regard, the Ballybeg lands align fully with the strategic objectives of the Clare County Development Plan, including those relating to compact growth, sustainable settlement patterns, and the consolidation of Key Towns such as Ennis.

Notwithstanding this, it is evident from a review of the Proposed Variation, and in particular the Ennis & Environs Settlement Map, that lands at R37 and other lands located at a comparable or greater distance from Ennis town centre have been prioritised for residential zoning. The exclusion of the Ballybeg lands in this context raises concerns regarding consistency in the application of settlement strategy and zoning criteria.

Accordingly, the Planning Authority is requested to clarify the rationale for the exclusion of the Ballybeg lands, particularly having regard to their clear alignment with compact growth principles and their strong integration within the existing urban fabric of Ennis.

Servicing, Infrastructure and Environmental Suitability of Subject Lands

The Ballybeg lands are fully serviceable by existing water and wastewater infrastructure. A modern public water supply is available along Clonroadbeg Road, and the Clonroadmore Wastewater Treatment Plant has recently been upgraded to increase capacity from 17,000 PE to 30,500 PE. This upgrade ensures compliance with EPA standards, protects the River Fergus, and provides sufficient capacity to serve new development. Pumped rising mains or a combination of gravity and pumped drainage solutions can facilitate connection from the elevated Ballybeg site, as demonstrated in previous servicing assessments.

In terms of ecological sensitivity, the site retains woodland and scrub along the northern and western boundaries. These natural features can be incorporated into the development, enhancing biodiversity, providing amenity value, and maintaining the landscape character of the area. The red line boundary of the submission intentionally excludes the northern woodland to ensure its protection. This approach aligns with CDP objectives for environmental management, habitat protection, and sensitive integration of development into the existing landscape.

Vehicular access is achievable via Clonroadbeg Road, avoiding the historic issues associated with Rocky Road as a vehicular route. The indicative layout demonstrates safe internal road geometry, connectivity to surrounding residential streets, and potential pedestrian linkages to existing footpaths. These measures address historic planning constraints identified in previous refusals (Reg. Ref. 08/730) and confirm the technical feasibility of development.

No flooding risk, abnormal ground conditions, or significant legal constraints have been identified. The site is therefore unconstrained and capable of supporting residential development in the short to medium term.

Readiness for Planning Application at Subject Lands

A critical consideration in planning for housing delivery is the realistic ability of lands to support development within the plan period. The Ballybeg lands are in single ownership, with full control of the site, and benefit from completed technical assessments, an indicative site layout, and alignment with existing infrastructure. These factors ensure that development can be progressed immediately following rezoning, providing a credible and near-term contribution to housing supply in Ennis.

The site's proximity to existing schools, community facilities, local shops, and recreational amenities ensures that future residents would be well integrated into the neighbourhood. The combination of serviceability, accessibility, ecological sensitivity, and sequential integration confirms that the Ballybeg



lands represent a ready-to-go opportunity for residential zoning.

Subject Lands Should be Released for Immediate Residential Development as a Priority.

The landholding which is the subject of this submission has the potential to deliver in the region of c. 10 homes – this is an opportunity which should be given significant consideration given the current mandate by government for housing delivery. These lands provide Clare County Council with real potential to allow for the natural extension of Ennis in a planned, co-ordinated and integrated manner.

The following table provides an evidence-based assessment of the subject lands in Ballybeg against deliverability, servicing and policy criteria to demonstrate their suitability for residential zoning:

Assessment Criteria	Yes	No	Commentary
Sequential & Settlement Context			
Contiguous with existing built-up area	✓		Adjoins established residential development.
Logical extension of settlement footprint	✓		Represents natural southern growth of Ennis.
Within walking distance of town centre services	✓		Less than 2.5km from Ennis Town Centre
Within reasonable walking distance of public transport	✓		TFI Links
Consistent with compact growth objectives	✓		Adjoins residential developments and avoids leapfrogging.
Accessibility & Connectivity			
Existing road frontage/access potential	✓		Located within established road network south of town. Access points available from Clonroadbeg Road.
Capable of pedestrian & cycle integration	✓		Adjoins residential areas; potential for permeability connections.
Proximity to schools and community facilities	✓		In proximity to social and community infrastructure facilities.
Servicing & Infrastructure			
Water supply infrastructure available / feasible	✓		Site is adjacent to existing and established residential neighbourhoods. Therefore, the site can be serviced by Uisce Eireann services with some upgrades which are feasible.
Wastewater infrastructure available / feasible	✓		
Surface water disposal achievable on site (SuDS)	✓		Surface water can be disposed of within the site boundary using SuDS techniques. No watercourse constraints; elevated site conditions.



Electricity & utilities accessible	✓		Adjacent to established residential infrastructure.
No reliance on major off-site strategic infrastructure	✓		Does not depend on long-term capital upgrades.
Environmental & Heritage Constraints			
Located outside Flood Zone A or B	✓		Not within identified flood zone.
Not identified as potential bat foraging grounds in Map 2 of the Newhall and Edenvale Complex SAC [Site Code: 002091] (Appendix)	✓		Not identified as potential bat foraging grounds
No Protected Structures on site	✓		None identified.
No Recorded Monuments / National Monuments	✓		None identified.
No SAC / SPA / NHA / pNHA affecting lands	✓		No ecological designations on or adjoining site.
No protected views materially restricting development	✓		None identified.
Planning & Ownership Considerations			
No conflicting land use designations	✓		Currently unzoned greenfield lands.
Single ownership / no fragmentation	✓		Under single ownership
No extant permissions restricting development	✓		No permissions restricting development
Available for immediate progression to planning	✓		No known legal or ownership barriers. The Enforcement Notice referenced by the Planning Authority is being fully complied with

Table 1 - Residential Zoning Suitability and Constraints Assessment Matrix for lands at Ballybeg

Accordingly, the lands satisfy the criteria for Tier 1 serviced / readily serviceable lands under NPO 101 and the NPF Implementation: Housing Growth Requirements (2025).

RESPONSE TO FEEDBACK

This office acknowledges the verbal feedback received from Clare County Council on 6 March 2026 in respect of the subject lands at Ballybeg, Ennis. The concerns raised relate to the following:

- Site is a bat foraging area,
- Environmental sensitivity, and
- Site is subject to Enforcement Notice.

These matters are addressed in detail below, having regard also to the stated purpose and intent of Proposed Amendment No. 1 and Proposed Amendment No. 3 of the Variation.



Site is a Bat Foraging Area

The lands are not located within any designated European site, including the Newhall and Edenvale Complex SAC, which lies approximately 800 metres from the subject site.

Map 2 of the Newhall and Edenvale Complex SAC [002091] (Appendix) clearly identifies areas of potential bat foraging habitat associated with the SAC, with such areas highlighted in green. A review of this mapping demonstrates that these identified foraging grounds are predominantly located outside the subject lands. The proposed site (outlined in red) lies almost entirely beyond these mapped areas, with little to no direct overlap evident.

This distinction is significant, as it indicates that the subject lands do not form part of the key or most sensitive foraging network associated with the SAC. Rather, the mapping suggests that the primary ecological corridors and habitats of importance are located elsewhere within the wider area. On this basis, the site can be considered to have a limited role, if any, in supporting SAC-related foraging activity, particularly when compared to lands that fall within the identified green network.

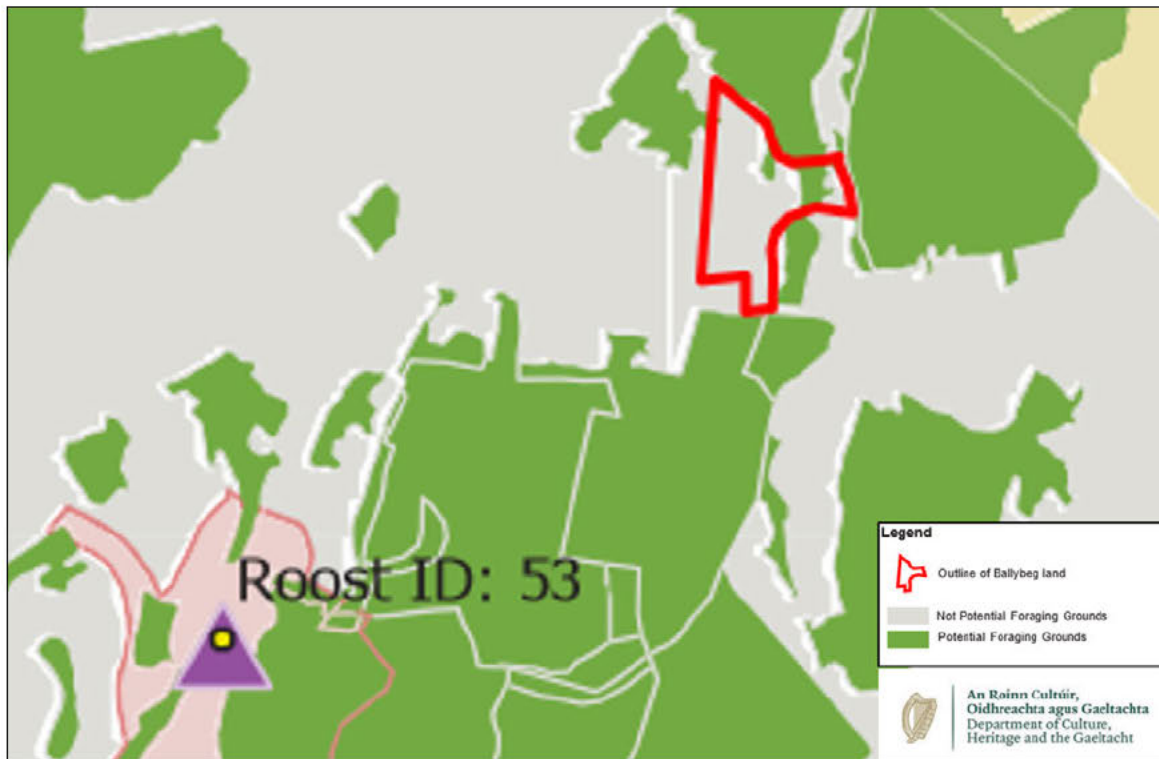


Figure 4 – Extract from Map 2 of the Newhall and Edenvale Complex SAC, showing the site outside potential foraging grounds

Importantly, the proposal has been informed by ecological considerations from the outset. The red line boundary of the subject lands has been deliberately defined to exclude areas to the north, thereby retaining habitats. In addition, the site outline demonstrates the retention and integration of boundary vegetation, treelines and green corridors, which will continue to facilitate bat commuting and foraging activity.

It is well established in national guidance and best practice that bat foraging activity can be successfully accommodated within residential development through appropriate design and mitigation measures. These may include the retention of linear landscape features, sensitive lighting design, buffering of key habitats, and the incorporation of biodiversity enhancements. Such measures would be fully explored and implemented at planning application stage, informed by detailed ecological assessment and, where required, Appropriate Assessment Screening.

Furthermore, it is noted that adjoining lands (R37), which form part of the same ecological context and are subject to similar habitat conditions, have been included within the proposed zoning framework. This further demonstrates that the presence of bat foraging activity has not been treated as a prohibitive constraint on the wider site.

It is also important to note that environmental considerations such as habitat protection, biodiversity management, and water protection are routinely and robustly addressed through the development management process. Any future planning application on the lands would be subject to detailed ecological assessment, Appropriate Assessment Screening, and compliance with all relevant environmental legislation and guidance.

In this regard, the ecological characteristics of the site do not represent a constraint to zoning, but rather a design consideration that can be appropriately managed through sensitive and informed development. The exclusion of the Ballybeg lands on this basis would therefore be disproportionate, particularly when compared to other lands included within the Proposed Variation that exhibit similar environmental characteristics.

Accordingly, the presence of potential bat foraging activity should not preclude the inclusion of the lands within the zoning framework, particularly having regard to their strategic location, serviceability, and contribution to sustainable housing delivery.

Environmental Sensitivity

The classification of the subject lands as environmentally sensitive, to an extent that would preclude their inclusion within the zoning framework, is not supported by objective evidence and is considered disproportionate.

The lands are not located within, nor do they directly adjoin, any designated European site, including the Newhall and Edenvale Complex SAC. Furthermore, there are no Natura 2000 sites, Natural Heritage Areas, or other statutory ecological designations affecting the subject lands. This indicates that the site is not subject to any overriding environmental constraints at a policy or legislative level.

While the site contains areas of vegetation, including hedgerows and peripheral woodland, such features are characteristic of lands within the wider Ennis area and do not represent an unusual or prohibitive constraint. These features can be readily retained and integrated into any future development as part of a landscape-led design approach, contributing positively to biodiversity, visual amenity, and green infrastructure.

It is also noted that the proposed development boundary has been consciously defined to exclude the more sensitive woodland areas within the broader landholding, thereby ensuring their protection. This demonstrates a proactive and design-led response to environmental considerations.

In practice, environmental sensitivities of this nature are routinely addressed through the development management process. Any future planning application would be subject to detailed environmental assessment, including Appropriate Assessment Screening where required, in accordance with the EU Habitats Directive. Standard mitigation and design measures can be implemented to ensure that potential impacts are avoided or minimised.

In this context, the environmental characteristics of the site do not represent a constraint to development, but rather standard considerations that can be appropriately managed through good design and planning. Accordingly, there is no robust basis for the exclusion of the Ballybeg lands from the proposed zoning framework on the grounds of environmental sensitivity.

Enforcement Notice

It is important to note that our client is fully complying with the requirements of this notice. The site is being actively managed in line with the directions set out, ensuring that all reinstatement works are being carried out appropriately and in a timely manner.

It is also relevant to highlight that a similar situation existed with the R37 lands that adjoin the subject site, which have been identified for rezoning under Proposed Variation No. 1. The issuance of an enforcement notice does not preclude the inclusion of lands in the zoning framework, as enforcement processes and rezoning applications are legally and procedurally distinct. Both processes operate



independently, and compliance with an enforcement notice does not restrict the Planning Authority from considering the lands for residential development.

The Council is aware of and monitoring the progress of compliance measures. The enforcement process is being actively addressed and does not constitute a barrier to the rezoning or development of the Ballybeg lands.

In conclusion, the presence of an enforcement notice should not be interpreted as a constraint to zoning. The lands remain fully capable of inclusion in the Proposed Variation, and their compliance status aligns with precedents set by adjoining or comparable sites included in the zoning framework.

Summary of Feedback

Having regard to the matters raised in the verbal feedback from Clare County Council on 6 March 2026, and in the context of Proposed Amendments No. 1 and No. 3 of Proposed Variation No. 1, it is respectfully submitted that the concerns identified do not provide a robust or evidence-based justification for the exclusion of the Ballybeg lands.

The ecological and environmental characteristics of the site are acknowledged; however, the lands are not located within, nor do they adjoin, any designated European site, Natura 2000 site, or other statutory ecological designation. Furthermore, the more sensitive woodland areas within the wider landholding have been deliberately excluded from the proposed red line boundary to ensure their protection. Vegetation features such as hedgerows, treelines, and peripheral woodland are characteristic of the wider Ennis area and can be retained and integrated into future development through standard design-led and mitigation measures, consistent with national best practice.

While the site may provide limited bat foraging habitat, it lies almost entirely outside the mapped potential foraging grounds associated with the Newhall and Edenvale Complex SAC. Retained green corridors, boundary vegetation, and sensitive landscape design can accommodate commuting and foraging activity without compromising ecological functionality. Adjoining lands (identified as R37 in the revised zoning map) with similar habitat conditions have been included in the zoning framework, demonstrating that the presence of bats is not treated as a prohibitive constraint.

The enforcement notice issued on the site is being fully complied with, with ongoing reinstatement works actively monitored by Clare County Council. Enforcement processes are legally and procedurally distinct from rezoning considerations and do not prevent the inclusion of the lands within the zoning framework. Compliance with the notice demonstrates that the site is actively managed and does not constitute a barrier to future development.

In conclusion, the Ballybeg lands represent a sequential, serviced, and deliverable extension of Ennis that can accommodate development in a manner sensitive to ecological and environmental considerations while complying with enforcement requirements. Exclusion of these lands, particularly in comparison to other lands with similar attributes included elsewhere in the Proposed Variation, would be inconsistent with the objectives of the Variation and could unduly restrict the Planning Authority's ability to meet housing delivery targets. It is therefore respectfully submitted that the Ballybeg lands should be included within the zoning framework as part of this Variation.



PROPOSED MATERIAL ALTERATION

The delivery of these lands for housing development will require their rezoning. The subject site is currently zoned 'Agriculture'. It is proposed that the subject site be rezoned to 'Residential' as part of the Ennis and Environs map under new Volume 3a(i) in the form of a Material Alteration to the variation. This proposed change is outlined in the zoning map below.



Figure 5 - Zoning Map outlining current (left) and proposed (right) zoning

This amendment would facilitate the planned and coordinated expansion of the existing urban area, ensuring that development occurs in a sequential and sustainable manner. The rezoning of these lands would unlock a serviced and readily deliverable site, capable of contributing to housing supply within the lifetime of the Development Plan.

Furthermore, the proposed rezoning would align with the objectives of compact growth, support the consolidation of the built-up footprint of Ennis, and promote the efficient use of existing infrastructure and services. It would also ensure consistency with the approach adopted elsewhere in the Proposed Variation, where settlement boundaries have been adjusted to accommodate appropriate residential development.

In this regard, the proposed Material Alteration represents a logical, evidence-based, and policy-compliant adjustment to the Variation, which would strengthen the overall effectiveness of the Development Plan in delivering sustainable residential growth.

CONCLUSION

This submission acknowledges the positive intent of Proposed Variation No. 1 in responding to national housing policy and increasing housing supply. However, it is considered that the current approach does not fully achieve its stated objectives, particularly in the context of Ennis as a Key Town. The exclusion of the Ballybeg lands represents a clear and unjustified omission in this regard.

In summary, the key points of this submission are as follows:

- The Ballybeg lands represent a logical, sequential extension of the existing built-up area of Ennis and are directly contiguous with established residential development, including Rockmount Manor, Rockmount Grove, Silver Grove, Clonroad More, and Killone Grove.
- The site is fully serviceable, in single ownership, and immediately available for development, representing a “ready-to-go” opportunity capable of delivering housing within the lifetime of the Development Plan.
- The lands benefit from access via Clonroadbeg Road and are located in close proximity to schools, childcare facilities, community infrastructure, and local amenities, supporting the creation of a sustainable and well-integrated neighbourhood.



- The proposal aligns with compact growth objectives by consolidating the existing urban footprint of Ennis and promoting the efficient use of established infrastructure and services.
- Proposed Amendments No. 1 and No. 3 explicitly seek to facilitate the zoning of additional, serviced, and deliverable lands; the omission of Ballybeg is therefore contrary to the stated purpose of the Variation.
- The Ballybeg lands comprise one of the few remaining parcels of land within this part of Ennis capable of accommodating residential development at scale, representing an efficient and sustainable alternative to more peripheral or less integrated sites.
- Historical planning permissions on the lands (Reg. Refs. 04/2702 and 07/1779) demonstrate that the principle of residential development at this location has previously been accepted by the Planning Authority.
- The ecological characteristics of the lands, do not represent a constraint to development and can be appropriately managed through design-led mitigation, including the retention of vegetation, green corridors, and sensitive lighting strategies.
- The lands are not located within any designated European site, including the Newhall and Edenvale Complex SAC, which lies approximately 800 metres from the subject site. Map 2 of the Newhall and Edenvale Complex SAC [002091] (Appendix) clearly identifies areas of potential bat foraging habitat associated with the SAC, with such areas highlighted in green. A review of this mapping demonstrates that these identified foraging grounds are predominantly located outside the subject lands. The proposed site (outlined in red) lies almost entirely beyond these mapped areas, with little to no direct overlap evident. This distinction is significant, as it indicates that the subject lands do not form part of the key or most sensitive foraging network associated with the SAC. Rather, the mapping suggests that the primary ecological corridors and habitats of importance are located elsewhere within the wider area. On this basis, the site can be considered to have a limited role, if any, in supporting SAC-related foraging activity, particularly when compared to lands that fall within the identified green network.
- The more environmentally sensitive woodland areas within the wider landholding have been deliberately excluded from the proposed red line boundary, ensuring their protection and demonstrating a proactive, environmentally responsive approach to development.
- The presence of an enforcement notice should not be interpreted as a constraint to zoning. The lands remain fully capable of inclusion in the Proposed Variation, and their compliance status aligns with precedents set by adjoining or comparable sites included in the zoning framework. The Council is aware of and monitoring the progress of compliance measures. The enforcement process is being actively addressed and does not constitute a barrier to the rezoning or development of the Ballybeg lands.
- The site is not subject to any European or national ecological designation, and environmental considerations can be appropriately addressed through the development management process, including ecological assessment and Appropriate Assessment Screening.
- The inclusion of other lands with similar ecological characteristics within the Proposed Variation highlights an inconsistency in approach and reinforces that such factors should not preclude the zoning of the Ballybeg lands.
- The exclusion of these lands represents a missed opportunity to deliver sustainable, serviced housing within the existing urban area and undermines the effectiveness of the Proposed Variation in achieving its housing delivery objectives.
- The proposed rezoning of the lands from 'Agriculture' to 'Residential' or 'Low Density Residential' is reasonable, evidence-based, and consistent with national policy and the principles underpinning the Variation.

Accordingly, it is respectfully requested that Clare County Council reconsider its position and include



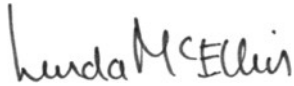
Submission to Clare Co. Co. Development Plan Variation No. 1

the Ballybeg lands within the zoning framework as part of Proposed Variation No. 1.

We confirm that we act for **The Courtney Family** and request that all future correspondence in relation to this matter be directed to this office.

If you have any queries, please do not hesitate to contact our office.

Yours sincerely,
Linda McEllin



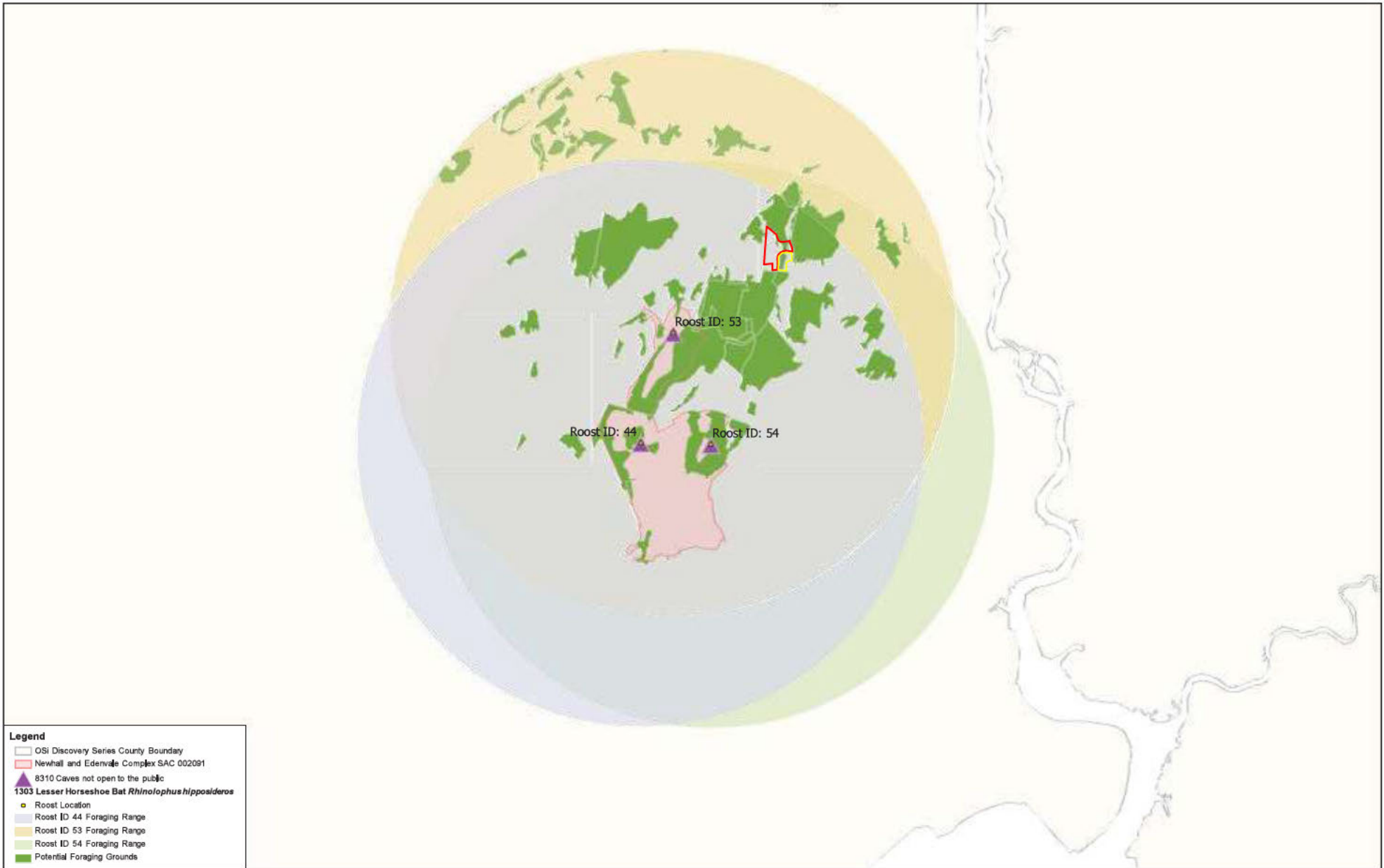
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Appendix

- **Map 2 of the Newhall and Edenvale Complex SAC (Site Code: 002091)**
- **Submission on Non-Statutory Consultation**



Legend

- OSI Discovery Series County Boundary
- Newhall and Edenvale Complex SAC 002091
- ▲ 8310 Caves not open to the public
- ▲ 1303 Lesser Horseshoe Bat *Rhinolophus hipposideros*
- Roost Location
- Roost ID 44 Foraging Range
- Roost ID 53 Foraging Range
- Roost ID 54 Foraging Range
- Potential Foraging Grounds

An Boird Cultúir,
Oidhreachta agus Geolachta
Department of Culture,
Heritage and the Gaeltacht

MAP 2:
NEWHALL AND EDENVALE COMPLEX SAC
CONSERVATION OBJECTIVES
LESSER HORSESHOE BAT

Map to be read in conjunction with the NPWS Conservation Objectives Document.

SITE CODE:
SAC 002091; version 3.0, CO. CLARE

0 0.3 0.6 0.9 1.2 Kilometers

The mapped boundaries are of an indicative and general nature only. Boundaries of designated areas are subject to revision.
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Ní sna teorainneacha ar na blioscáilleana ach nod garshuíomhach ginearálta. Féadfar athbhreithnithe a déanamh ar theorainneacha na goeantar comharthaíthe, Suirbhéarachta Ordonáils na hÉireann Ceadúnas Uimh EN 0059216, © Suirbhéarachta Ordonáils na hÉireann Rialas na hÉireann

Map Version 1
Date: June 2018

**NPF HOUSING GROWTH –
ADDITIONAL RESIDENTIAL LANDS**

**Lands at Ballybeg,
Ennis,
Co. Clare**

On behalf of

The Courtney Family

18 December 2025



Planning & Development Consultants
63 York Road,
Dun Laoghaire
Co. Dublin
www.brockmcclure.ie

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1 INTRODUCTION

We, **Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin** are writing to you on behalf of **The Courtney Family, Ballybeg, Ennis, Co. Clare**. This submission is made in response to Clare County Council’s non-statutory public consultation inviting proposals from relevant parties for additional residential lands suitable to support accelerated housing delivery and that deliver on the requirements of the *National Planning Framework First Revision (2025)* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025)*.

These Guidelines set new annual housing growth requirements for each local authority up to 2040 and have set a clear mandate for Planning Authorities to implement these revised housing growth requirements in the relevant City or County Development Plan. The Guidelines also set out that an “additional provision” of up to 50% over and above the baseline housing growth requirement must be reflected in the Development Plan, subject to consistency with the policies and objective of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issues under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

The objective of this submission is to identify lands at Ballybeg, Ennis that can contribute to meeting Clare County Council’s revised housing growth requirements and support accelerated housing delivery in the County’s key town of Ennis. Specifically, this submission puts forward a proposal for the rezoning of lands at Ballybeg, Ennis, Co. Clare from ‘agriculture’ to ‘low density residential’ or ‘residential’ (as the Planning Authority sees fit) for consideration at this time.

Within this context, Clare County Council are requesting proposals for lands or sites to come forward within towns or villages as identified within the settlement hierarchy (but excluding open rural countryside sites) that satisfy the following requirements:

- a. *Align with the strategic objectives for growth as set out in the Clare County Development Plan 2023-2029*
- b. *Are serviced, due to be serviced or serviceable over the remaining life of the Clare County Development Plan i.e. 2026-2029, or in the long term 2029-2039*
- c. *Would contribute to sustainable, compact and sequential patterns of growth*
- d. *Would support the development of infill housing, housing on brownfield land or address vacancy and dereliction*
- e. *Are located in towns and villages with good social infrastructure and capacity in schools and community facilities.*

In this context, the subject lands to which this submission relates align with Clare County Council’s criteria for accommodating future housing growth. For clarity, this site is generally located in close proximity to Ennis - identified as a key town in the settlement hierarchy – and can be positively considered as part of this non-statutory consultation process. We note specifically that:

- **The principle of residential development at this location provides for a logical extension of the local existing built-up area at Ballybeg and makes efficient use of currently underutilised, serviced and ‘ready to go’ development lands.**
- **The site directly adjoins a site, to the east, that previously secured planning permission for 76 no. dwellings outlining the support in principle for development at this general location.**
- **The site can also come forward as a masterplan approach to development incorporating lands immediately adjacent to the eastern site boundary, which are also coming forward for residential development as part of this non statutory consultation process. These lands are under separate ownership with a separate submission being made by the Flanagan Family at this time.**
- **The overall site has good accessibility to local routes, amenities, neighbourhood and town centre services and public transport contributing to sustainable, locally connected development.**
- **The site can be readily serviced in the short to medium term, ensuring deliverability without undue infrastructure constraints with appropriate connection points in place for water mains and waste water.**
- **The site is located in close proximity to established schools, community amenities and essential services.**

We trust that the Planning Authority will review the proposal before them and positively consider the proposal for the subject site in their review of appropriate locations for residential development.

This submission is made within the timeframe specified by Clare County Council, which accepts proposals from 21 November 2025 to **19 December 2025**.

We trust that due consideration will be given to the residential zoning of these lands in any future variation to the Clare County Development Plan that may come forward.

2 SITE LOCATION AND CONTEXT

The subject site comprises approximately 3.2 hectares, with roughly 60 metres of frontage onto the Clonroadbeg Road to the south. It is situated within the established neighbourhood of Ballybeg in Ennis, County Clare. The surrounding area consists of a mix of more recent residential housing estates such as Rockmount Manor, Rockmount Grove, Silver Grove and Killone Grove, as well as an older, more traditional patterns of individual dwellings that have developed in a linear arrangement along Clonroadbeg Road.

The extent of the site subject of this submission is outlined below in red. Lands within our client’s ownership are outlined in blue.



Figure 1 – Aerial view showing subject site to be rezoned for residential development (red) and overall landholding of our client (blue)

It is notable at this point that our client is only seeking a rezoning on the portion of the lands in red only as those lands further north and within their ownership are more ecologically sensitive given the wooded nature of this location.

The site’s topography slopes gently downward from the high point at Clonroadbeg Road towards the north, in the direction of the N85. Much of the central and western parts of the site consist of scrub and naturally establishing woodland. This woodland is dominated by ash trees, with hawthorn and bramble scrub. A number of semi-mature and mature sessile oak and ash trees are also present. As set out in the Teire report accompanying this submission, there is significant ash die back associated with the trees on site.

Kilrush Road, accessed from the site via Clonroadbeg Road, serves as the primary route connecting the site to Ennis Town. The site is located less than 4 km from the town centre – approximately an 8-minute drive – offering convenient and efficient connectivity to Ennis’s extensive range of services and amenities. These include a broad mix of retail and commercial facilities, such as Dunnes Stores, Intersport Elverys, the Ennis Bookshop, The Arc Cinema and Clare Museum.

Ennis Shopping Centre, situated on the eastern side of the town, accommodates well-known retailers including Penneys, Tesco Superstore, and the Ennis Medical Centre. Additionally, Aldi is positioned directly to the north of Ennis Shopping Centre. Ennis Hospital is located to the north of the town centre and is similarly accessible from the subject site, with an approximate travel time of eight minutes from the subject lands in Ballybeg.

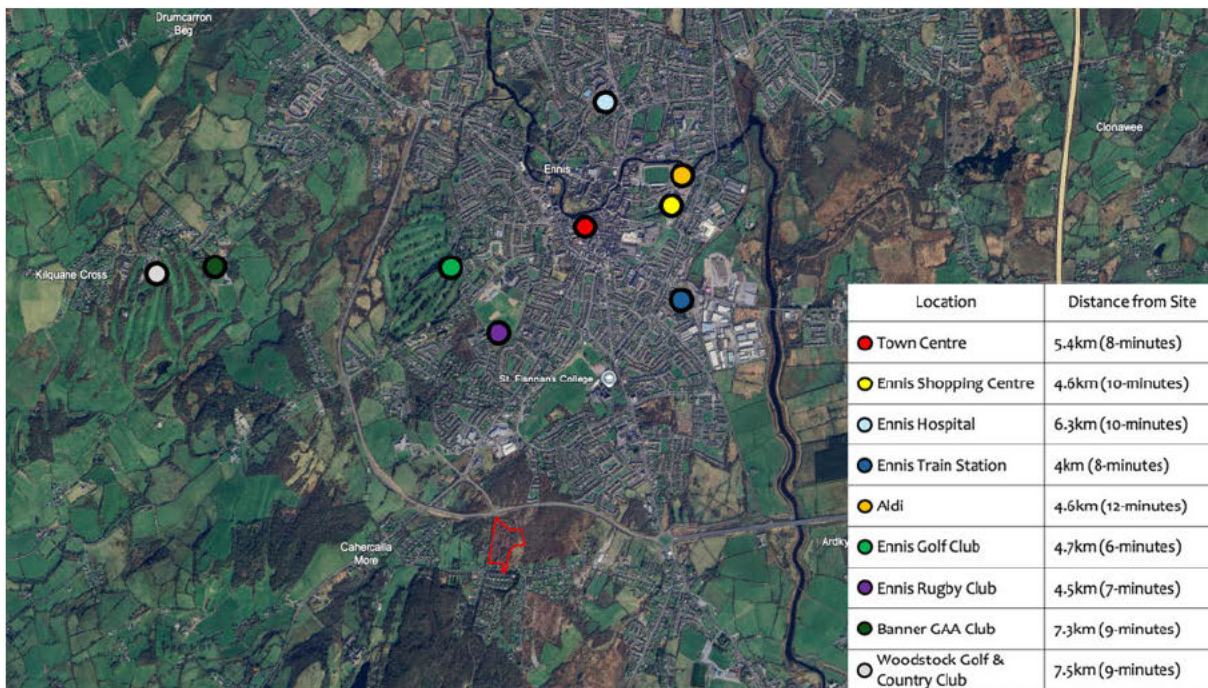


Figure 2 – Aerial view of subject site, outlined in red

The lands are in close proximity to a wide range of amenities and community facilities, many of which are within comfortable walking distance including Ballybeg Woods, Eire Og Inis GAA Club, Cahircalla Neighbourhood Centre, Ennis National School, St Flannan’s College, Clarecastle GAA Club, Clarecastle National School. The Rocky Road, which adjoins the western boundary of the site, provides an established pedestrian link between Ballybeg and St. Flannan’s Drive.

The range and accessibility of these facilities indicate that the site is well integrated within an existing residential community and is suitably located to support further development.

2.1 Public Transport Links

While Ennis does not have a comprehensive internal town bus network, the town functions as a key regional transport hub and is served by several interurban and regional bus routes. The subject site is 8km from Ennis Bus Station, which is approximately an 8-minute drive. Bus Éireann operates a number of services that link Ennis with surrounding towns and cities. Additionally, TFI Local Link provides rural connectivity to and from Ennis, offering important links to smaller settlements. These are identified in the table below.

Route No.	Connections
350	Regular daily services between Ennis and Galway, stopping at Kinvara, Doolin and other intermediate settlements.
333	Links Ennis with Miltown Malbay, Lahinch, Doonbeg and Kilkee, operating multiple services per day.
336	Connects Ennis with Limerick City and west Clare towns, providing daily services at intervals throughout the day.
343	Enhanced corridor service between Limerick, Shannon and Ennis, with buses as often as every 20–30 minutes at peak times and continued services throughout the day and night.

344	Serves Whitegate, Scariff and Mountshannon with several return journeys per day.
331	Links Ennis with Ennistymon, Lisdoonvarna and rural areas to the northwest, with multiple daytime and evening services.
337	Links Ennis with Kilrush, Knock, Moneypoint and other local areas.
318	Links Ennis with Limerick City, with 4 no. departures from Ennis Bus Station throughout the day.
51	The Bus Éireann Cork to Galway service, which calls at Shannon Airport and Ennis en route, runs several times daily connecting the south and west coasts and providing a longer-distance public transport link to and from Ennis

Table 1 – Bus routes connecting Ennis to different settlements in the region

In addition to the above, Ennis Train Station (8-minute drive from the subject site) further strengthens the town’s role as a transport hub. Located on the Limerick–Galway rail line, it provides regular services in both directions, allowing direct and reliable travel to Limerick and Galway with onward connections to the national rail network. This multimodal transport offering supports strong accessibility to employment, education, retail and leisure opportunities across the region.

2.2 Services

As set out in the images below, there is existing water supply along Clonroadbeg to the south of the site. There is also a wastewater sewer located close to the subject site.

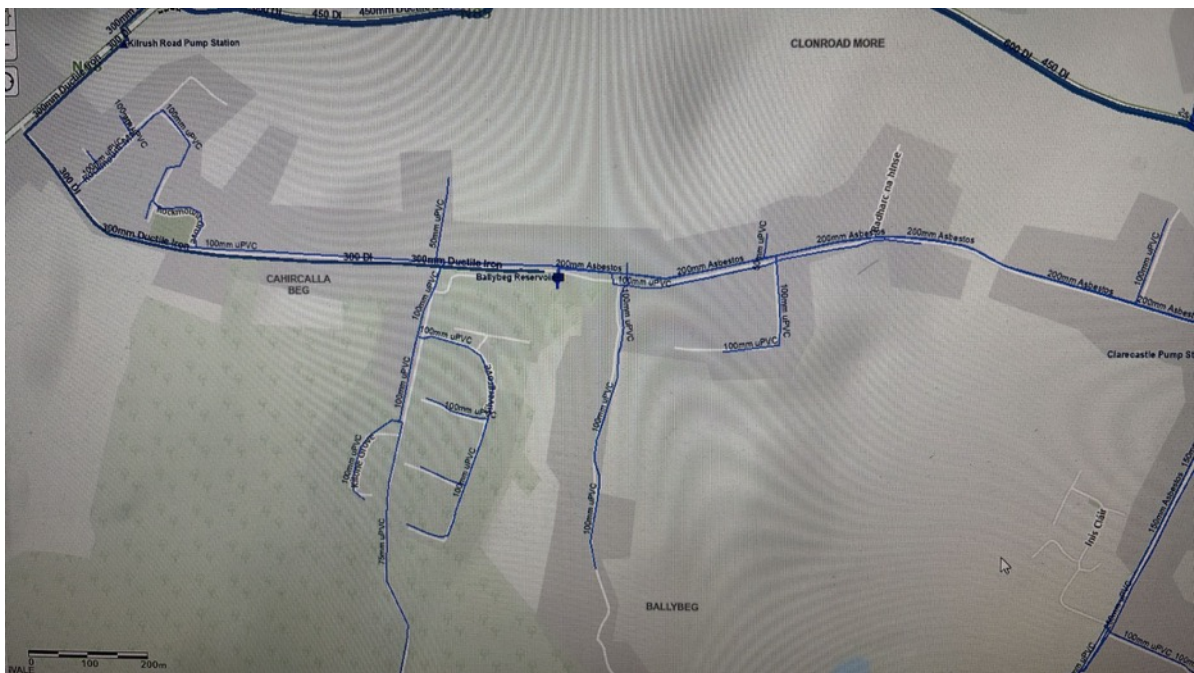


Figure 3 - Water Supply



Figure 4 - Waste Water Services

It is understood that the wider Ennis area is serviced by the Clonroadmore Wastewater Treatment Plant and the Clareabbey Wastewater Treatment Plant. Clonroadmore has undergone significant upgrades in recent years, increasing its capacity, while the Clareabbey plant is understood to be operating at or near capacity. Notwithstanding this, the availability of upgraded treatment capacity at Clonroadmore suggests that, subject to confirmation with Irish Water and the provision of suitable pipes, pumps and infrastructure, the subject lands can be appropriately serviced to support development.

3 PLANNING HISTORY

3.1 Subject Site

Reg. Ref. 08/730

Outline planning permission was refused by Clare County Council on 25 June 2008 at this site for the construction of 16 no. dwellings for the following reasons:

1. *The proposed development would be premature by reference to an existing deficiency in the provision of water supply and sewage treatment. In the absence of an overview/masterplan with regard to the comprehensive servicing of all lands along the Ballybeg Road, the proposal would therefore be contrary to the proper planning and sustainable development of the area.*
2. *The proposed development would endanger public safety by reason of a serious traffic hazard, as a result of the proposed linear internal road layout and the proposed entrance onto the Rocky Road public right of way, whose access onto the Ballybeg road is deficient, and with restricted sight visibility.*
3. *It is considered that the proposed development, by reason of its proximity to and access onto the Rocky road public right of way, would result in a negative effect on the existing amenity value of this route, identified in the Development Plan as ‘a significant feature of natural and historical heritage’. The proposal would therefore be contrary to the objectives of policies ENV 4 and ENV 6 of the Ennis and Environs Development Plan, 2003, which seek to preserve the amenity, character and appearance of local landscape features. The proposal would therefore be contrary to the proper planning and sustainable development of the area.*
4. *It is considered that the proposed development, by reason of the linear layout of housing units, the peripheral location of open space areas and the lack of open space provision within the residentially zoned part of the site, would not provide for satisfactory residential environment and would result in an unacceptably low level of residential amenity for the occupants of such dwellings. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*

It is noted that the site to which Reg. Ref. 08/730 relates is situated on the western portion of the subject lands. Since the refusal of that application in 2008, the wider Ballybeg area has undergone notable change. Additional residential development has taken place in the wider surrounding area, road and pedestrian connections have become more defined, and the servicing context has improved considerably.

In particular, wastewater and water supply infrastructure serving Ennis has been enhanced, most notably through upgrades to the Clonroadmore Wastewater Treatment Plant, which now operates with significantly increased capacity. These improvements address the infrastructure deficiencies cited in the earlier refusal and provide a more robust basis for supporting future development.

It is also noted that appropriate site access can now be achieved via Clonroadbeg Road to the south of the site, which addresses previous concerns in relation to site access.

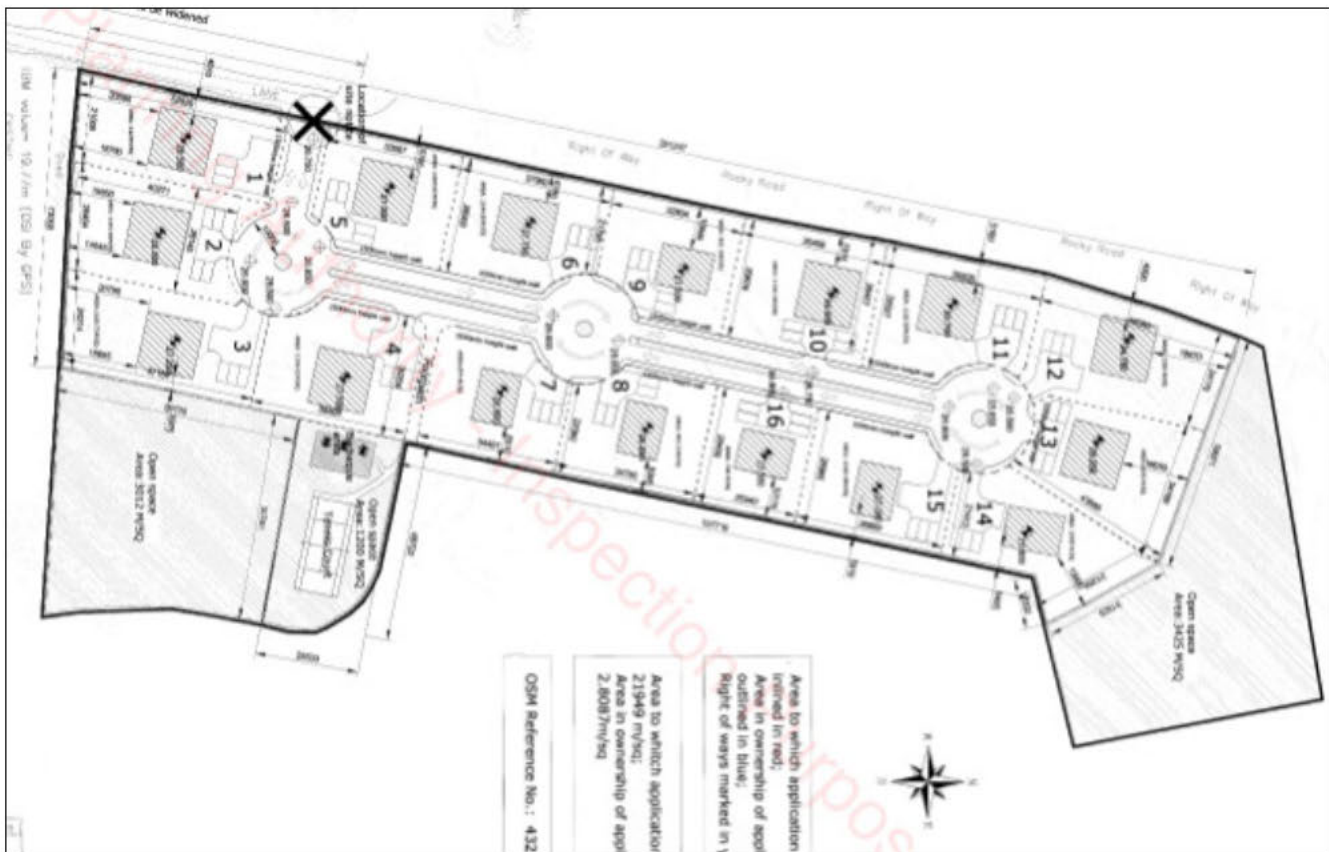


Figure 5 – Site layout Plan refused under Reg. Ref. 08/730

3.2 Surrounding Area

Before outlining the following planning applications, it is relevant to note that both permissions relate to lands directly east of the subject site. These applications demonstrate the Planning Authority’s previous acceptance of residential development in this location and provide important contextual precedent for the suitability of the wider Ballybeg area for housing.

Reg. Ref. 042702 (Ballybeg, Ennis, Co. Clare)

Planning permission granted by Clare County Council on 18 June 2006 for the construction of 120 no. residential units, consisting of 28 no. apartments and 92 houses together with an ESB substation, creche and associated site works.

Reg. Ref. 071779 (Ballybeg, Ennis, Co. Clare)

Planning permission granted by Clare County Council on 28 January 2008 for the construction of 76 no. dwellings, creche and ESB substation facility and associated site works.

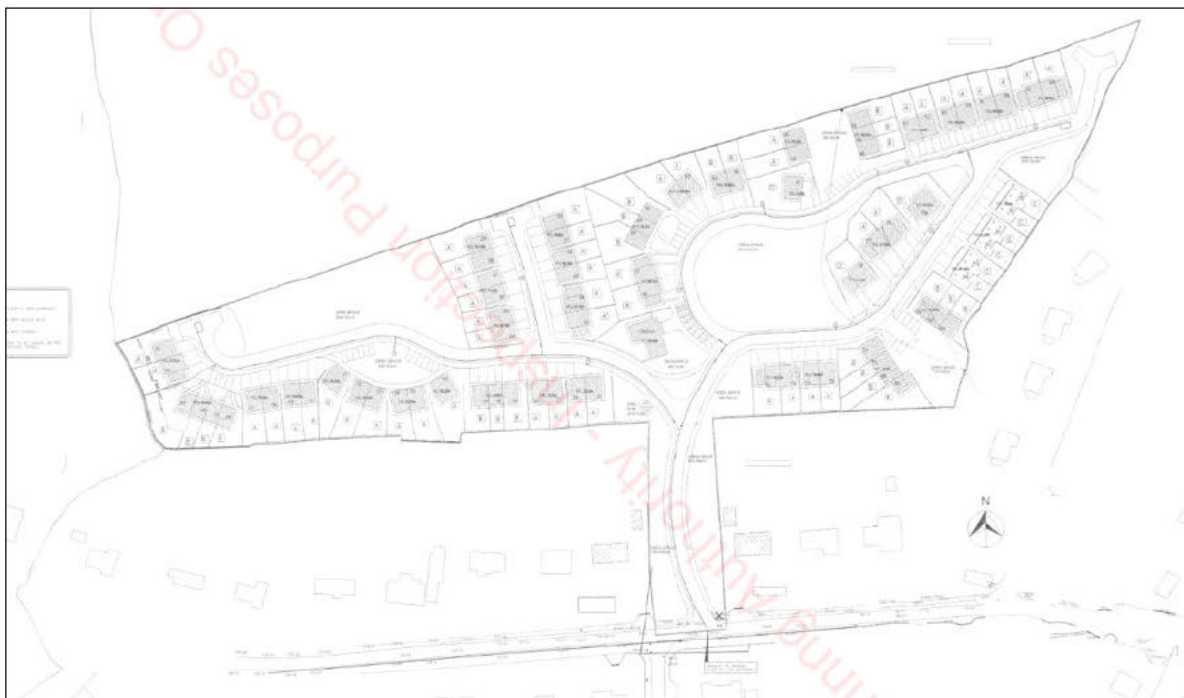


Figure 6 – Approved Site Layout Plan under Reg. Ref. 071779

It is important to note that permission was initially sought for the construction of 82 no. dwellings. However, following a request for further information and amendments made to the site layout, the approved number of dwellings was reduced to 76 no. The site layout shown above is that which was submitted to the Planning Authority on 26 November 2007 and it is noted that Condition No. 2(b) stated that a revised site layout, with the omission of 2 no. dwellings, shall be submitted to the Planning Authority prior to the commencement of the development. However, following a review of the online portal, it appears this revised site layout was never submitted to the Planning Authority. Notwithstanding this, this development never took place, as the lands are still vacant to this day.

Although the permitted development under both applications was ultimately not constructed, these approvals remain significant as they confirm that the Planning Authority previously considered this location to be suitable for residential use of a substantial scale. The fact that the adjoining lands remain undeveloped is a consequence of non-implementation rather than planning policy constraint, and the permissions provide a clear and relevant precedent supporting the appropriateness and potential of the subject lands for future residential development.

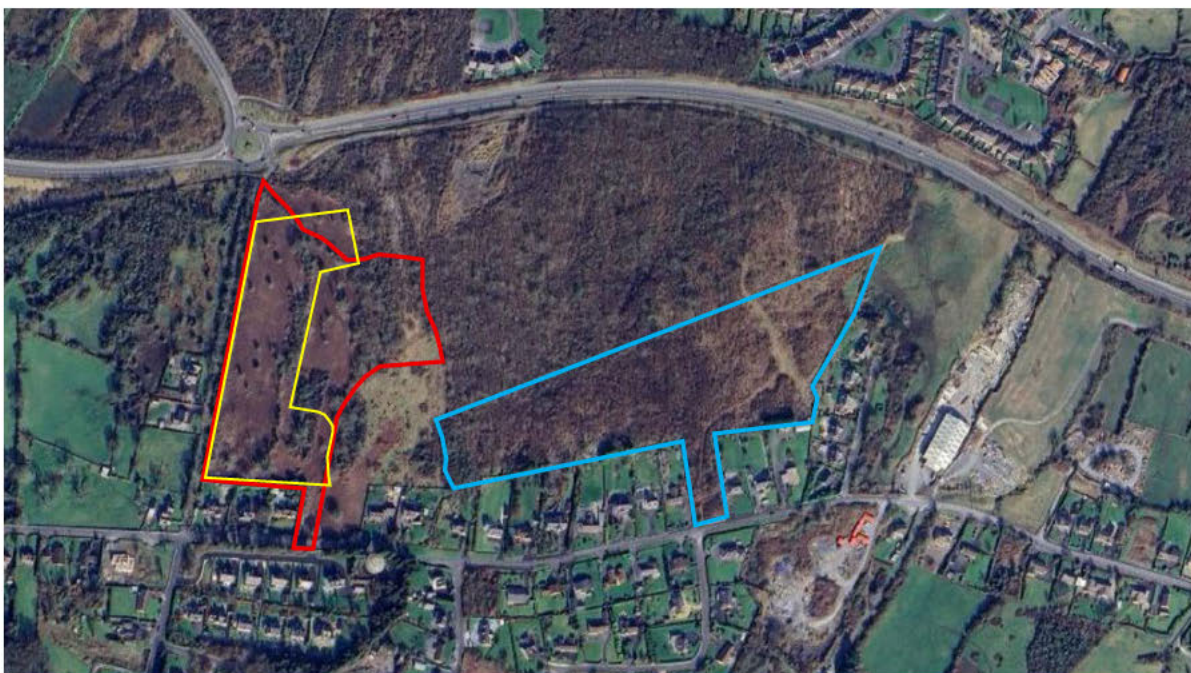


Figure 7 – Aerial view showing the subject site (red), adjoining approved Reg. Ref. 071779 (blue) and on-site refused Reg. Ref. 08/730 (yellow)

3.3 Clare County Council Development Plan Context

The lands subject of this submission were previously put forward for residential zoning under the Clare County Council Development Plan 2023-2029 review period. Concerns were raised at that time in relation to the service capacity of the site and that the development of this site would result in the loss of a mapped foraging habitat which would be contrary to the conservation objectives of the Newhall and Edenvale complex.

We note that the servicing of this site has been addressed with potential for access to services identified in this submission. There is a clear water supply network and local access to waste water facilities. The site also has the benefit of local footpaths and public lighting along Clonroadbeg.

Teire Ecological Consulting were recently appointed to prepare an ecological appraisal of the lands at Ballybeg within the context of the conservation objectives of the Newhall and Edenvale Complex SAC, which is located over 800m from the site. That appraisal noted that whilst the overall lands within the control of the Courtney Family are not located within the SAC they are within the foraging range of the species of the SAC. The appraisal goes on to state that woodland, hedgerows and treelines remain in good condition overall on site and are of particular importance as commuting and foraging corridors for Lesser Horseshoe Bat.

It is worth highlighting again at this point that the lands subject of this submission exclude the main woodland area from the red line boundary to ensure that this area remains in use for agriculture.

Our client wishes to set out that any potential residential development that may come forward at this site will be required to carry out the appropriate ecological evaluations and any relevant Appropriate Assessment screening which would be due process in the development management system. Our client remains committed to retaining any ecological value associated with the site and any proposal that comes forward will be sensitively designed in this context.

3.4 Summary

The planning history of both the subject lands and the immediately adjoining lands demonstrates that the wider Ballybeg area has long been recognised as having potential to accommodate residential development.

While an outline application for 16 dwellings on the western portion of the subject site (Reg. Ref. 08/730) was refused in 2008, the reasons for refusal were primarily based on the infrastructural and contextual circumstances of that time, including deficiencies in water supply and wastewater treatment, access concerns relating to the Rocky Road, and issues arising from the proposed layout. Since then, the area has undergone significant change. Residential development has expanded in the vicinity, local connectivity has improved, and crucially, the servicing environment has strengthened following upgrades to the Clonroadmore Wastewater Treatment Plant and broader improvements to water and wastewater infrastructure in Ennis. These upgrades directly address the core servicing constraints that contributed to the earlier refusal.

The lands immediately to the east of the site were previously granted planning permission for substantial residential development under Reg. Refs. 04/2702 and 07/1779. Although the latter superseded the former and neither scheme was ultimately constructed, the permissions themselves demonstrate that the Planning Authority accepted the principle of significant residential development on these lands. This establishes an important planning precedent and confirms that the area has long been considered suitable for housing, subject to appropriate design and servicing arrangements.

Taken together, the evolution of the surrounding area, the improved infrastructural context, and the established planning precedent on adjoining lands all indicate that the constraints which informed the 2008 refusal no longer apply in the same manner. The subject lands now sit within a more mature, serviced, and policy-aligned context, reinforcing their suitability to contribute to future residential development in Ballybeg in accordance with the strategic objectives of the Development Plan and national guidance.

4 CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Clare County Council County Development Plan 2023-2029 is the relevant statutory context for this site.

4.1 Ennis Municipal District Settlement Plans

Notably, Volume 3a of the Development Plan sets out the detail of the Ennis Municipal District Settlement Plans which provides a detailed and local level framework for land-use zoning, development, and growth management within the Ennis area and its environs. The Plans implement the broader Settlement Strategy for County Clare by defining how future population growth, housing, infrastructure, and services will be distributed in the municipal area.

Ennis is identified as the principal ‘Key Town’ – within the Clare County Council Development Plan and its role is clearly identified as being a regional driver of economic activity, service provision, and residential growth. The site is located within the Ennis settlement context and must be given favourable consideration in this non-statutory public consultation for a call for additional lands for residential zoning.

The Ennis Municipal District Plan include policies and objectives that promote sustainable, compact growth; regeneration of the town centre; mixed-use and residential zoning; integration of land-use with transport planning and public infrastructure; and balanced, plan-led development to support employment, social infrastructure, environmental quality and quality of life.

The following key points are notable in this context.

4.1.1 Current Zoning

The site is located within the Ennis Plan boundary and is currently zoned ‘agriculture’ in the Clare County Development Plan 2023-2029. Section 19.4 in the Development Plan sets out the nature of zonings in Clare County and states the following in relation to ‘agriculture’:

“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”

The following Development Plan Objective is relevant to the zoning of lands:

CDP 19.2 Zoning of Lands

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.

CDP 19.2 establishes the requirement for an adequate quantum of zoned land within settlement plans and Local Area Plans to support the population and housing targets set out in the Core Strategy. This objective is directly relevant to the subject site, as the proposed rezoning would assist in ensuring that sufficient, appropriately located land is available to accommodate planned residential growth within the Ennis area. By bringing this land within the zoning framework, Clare County Council can more effectively respond to identified housing demand, support the consolidation of existing neighbourhoods such as Ballybeg, and maintain alignment with the broader strategic goals of the Development Plan.

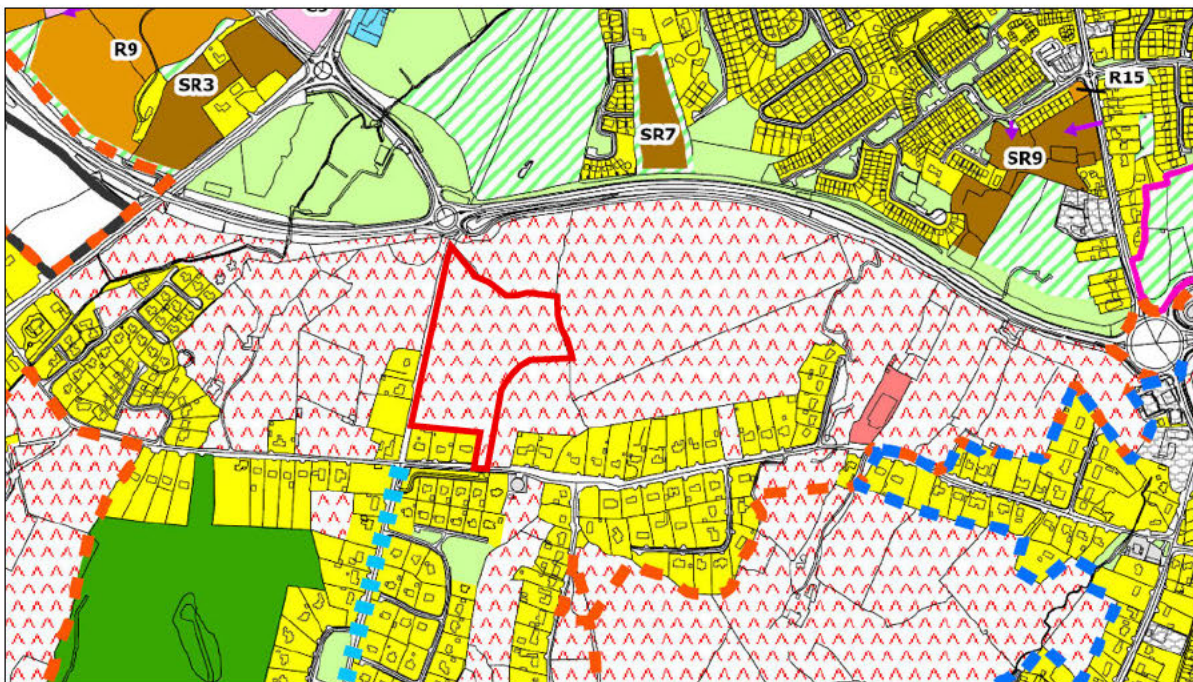


Figure 8 – Extract from Site Zoning Map, showing subject site outlined in red

It is submitted that the subject lands have the capacity to contribute to the provision of sufficient residentially zoned land within the County, in accordance with the strategic direction of the Clare County Development Plan 2023–2029. The release of these lands for residential purposes would support the implementation of Objective CDP 19.2 by ensuring that an adequate supply of appropriately located land is available to meet both current and emerging housing needs. Furthermore, the proposed rezoning of these lands would align with the population and housing projections identified at national level, particularly the National Planning Framework (NPF) Housing Requirements 2025, thereby assisting Clare County in meeting its statutory housing delivery targets.

4.1.2 Ballybeg

Volume 3a in the Development Plan contains the Ennis Municipal District Settlement Plans and Section 2 has regard to ‘Ennis and Environs Technical Guidance’. More specifically, Section 2.13.3 relates to ‘Cahircalla Beg/Ballybeg’ and states the following.

“No additional residential lands are identified in Ballybeg, and any future development in this area will relate to redevelopment of existing sites or the development of infill sites.”

This guidance indicates that the Development Plan does not envisage large-scale expansion of Ballybeg beyond its existing footprint; however, it does explicitly support the redevelopment of existing sites and the delivery of infill development where it can be appropriately integrated into the established built form. In this context, the subject lands represent a logical and policy-consistent opportunity for future residential development.

We note specifically that the site is located on the boundary of the Clonroadmore Neighbourhood.

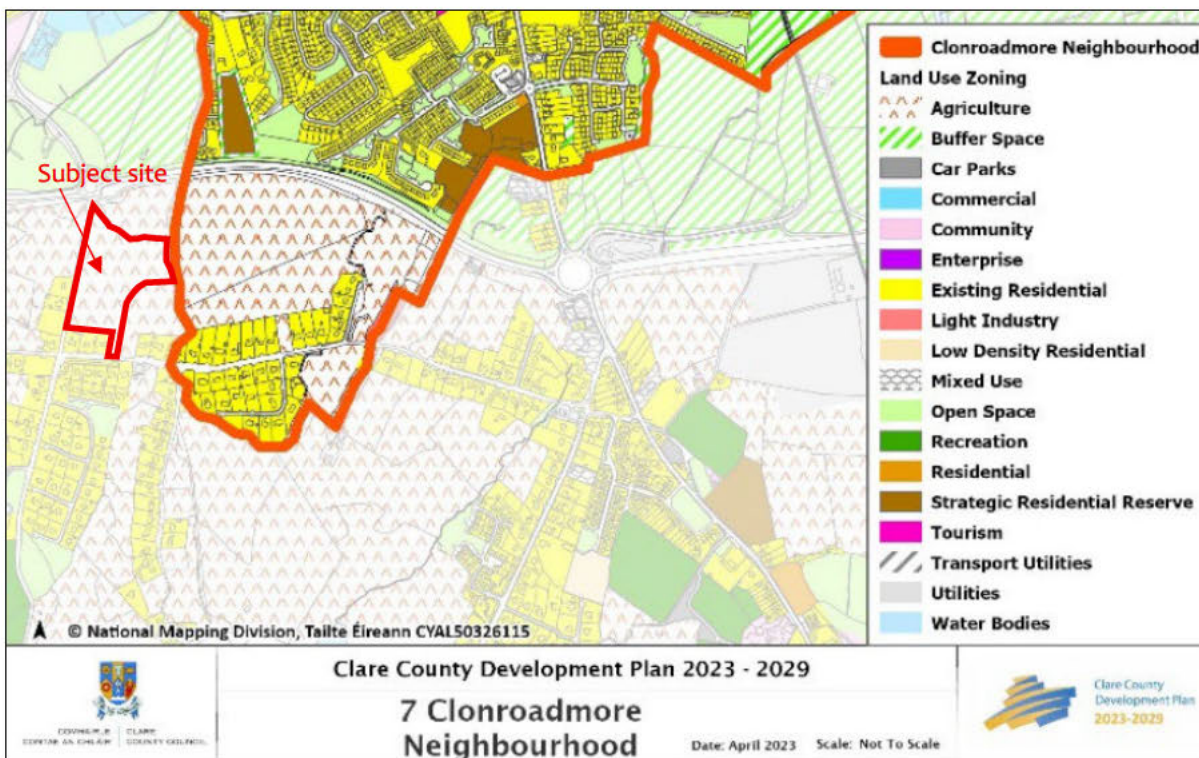


Figure 9 – Clonroadmore Neighbourhood Zoning Map

The site is located in an established residential area within this context. The site is framed by existing residential development to the east, established housing areas to the south, and long-standing residential properties extending along the Clonroadbeg Road. Moreover, there are residential neighbourhoods located further from Ennis town centre than the subject lands, meaning the site sits well within the existing settlement pattern and does not represent outward expansion into peripheral or unserved lands. Instead, the development of the site would consolidate the existing urban form and help to strengthen the structure of the Ballybeg neighbourhood.

The site benefits from proximity to community facilities, schools, established neighbourhoods and existing infrastructure, all of which support compact and sequential growth in line with national and local policy. Its development would make efficient use of serviced or serviceable lands, contribute to the sustainable intensification of the existing urban area, and deliver housing within walking distance of key amenities.

Accordingly, the subject lands in Ballybeg provide a suitable, well-located and policy-supported opportunity for infill residential development that reinforces the existing settlement structure and supports the delivery of additional housing in a sustainable manner.

4.2 Core Strategy

Chapter 3 in the Development Plan sets out the Core Strategy for Clare County. Here, Ennis is identified as a Key Town, the only one in Clare County. This chapter notes that the focus of the Core Strategy is on developing and strengthening the role of the Key Town of Ennis, among other settlements in the County.

Currently, the Core Strategy identifies where future development is expected to occur across the county, but it is not intended to restrict growth rigidly. The Plan notes that the settlement-level growth figures are to be interpreted as targets rather than strict limits. Where a settlement has capacity and suitable zoned land available, development may be supported that exceeds the stated Core Strategy targets. Table 3.4 in the Development Plan outlines the Core Strategy for Clare County and they key figure for Ennis are shown in the table below.

2016 Population	Population Target 2029	2023-2029 Population Target	Housing Units Target	Compact Growth/Infill/Brownfield (Units)	Residential Units to be Delivered on Greenfield Sites
25,276	29,629	2,480	1,550	465	1,085

Table 1 – Extract from Table 3.4 – Core Strategy Table in the Development Plan for Ennis

CDP 3.1 Core Strategy

It is an objective of Clare County Council:

To support the delivery of the Core Strategy in accordance with the Table 3.4 Core Strategy Table and the Map 3A Core Strategy.

CDP 3.2 Supply of Zoned Land

It is an objective of Clare County Council:

To ensure that sufficient land continues to be available to satisfy the housing requirement of the County over the lifetime of the plan.



Figure 10 – Map 3A Core Strategy in the Clare County Development Plan 2023-2029

Evidently, the publication of the National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025) set out the requirement for current core strategy housing figures to be updated, which is considered further in Section 6 of this report.

4.3 Settlement Strategy

Chapter 4 of Volume 1 of the Development Plan sets out the Urban and Rural Spatial Strategy for Clare County. Section 4.2 relates specifically to the Settlement Strategy for Clare, which aims to direct future development in a balanced, sustainable, and plan-led manner, recognising the role of towns, villages, and the countryside in supporting population growth, employment, and services. The Settlement Hierarchy guides the scale of growth appropriate to each settlement and informs the delivery of population targets.

Central to the strategy is compact growth, which promotes higher-density, mixed-use development, the efficient use of urban lands, and the consolidation and revitalisation of towns and villages. This includes the

development of brownfield, infill, and backland sites, as well as the reuse of vacant or derelict buildings, alongside the provision of social and green infrastructure. Compact growth aims to enhance connectivity, support sustainable transport, reduce car dependency, and optimise public infrastructure investment.

In line with the National Planning Framework, the Plan prioritises development within existing built-up areas. The Plan continues to support a sequential approach to growth, prioritising infill, brownfield, and backland sites to achieve sustainable and efficient settlement patterns.

Section 4.2.3 of the Development Plan outlines the county Settlement Hierarchy and Strategy and contains a specific section on Ennis. It states that Ennis is the largest town in County Clare and Munster, the only key town in Clare, the fifth largest town in the Southern Region, and is designated a ‘Key Town’ in the RSES.

As the County and University Town, it is a major residential, educational, service, and commercial centre with significant employment, a young and educated population, a dynamic business sector, and a strong tourism and cultural profile. Recognised as a key element of the Limerick-Shannon-Ennis economic triangle, Ennis sits at the top of Clare’s Settlement Hierarchy and is targeted for over 30% population growth by 2040. The ‘Ennis 2040 – Economic and Spatial Strategy’ provides a long-term framework to manage its sustainable development, including infrastructure, transport, housing, employment, and town centre vitality. Objective ‘CDP 4.1 Ennis’ is a key Development Plan Objective for the town. While the Planning Authority will be familiar with its full content, it can be succinctly summarised for clarity as follows:

It is an objective of Clare County Council to support Ennis as a self-sustaining regional economic driver and key investment location, leveraging its strategic position near Limerick, Galway, Shannon Airport, and the Atlantic Economic Corridor. The Council seeks to implement the Ennis 2040 Economic and Spatial Strategy, prepare a Local Area Plan, strengthen links with neighbouring towns and cities, and deliver holistic infrastructure to accommodate sustainable growth.

Objectives include promoting lifelong learning and higher education, enhancing town centre retail and mixed-use services, supporting placemaking and urban regeneration, developing tourism, integrating land use with sustainable transport, advancing climate adaptation, safeguarding grey, green, and blue infrastructure, encouraging biodiversity and low-carbon building measures, and increasing town centre living, including potential family-oriented pilot projects.

Additionally, the following Objectives are also relevant:

CDP 4.11 Settlement Networks

It is an objective of Clare County Council:

To support the concept of settlement networks, to assist collaborative projects and the sharing of assets and strengths, to enhance the viability of County Clare’s towns, villages and rural communities, in order to facilitate the maintenance and expansion of existing population levels, services and roles.

CDP 4.12 Monitoring and Implementation of Settlement Strategy

It is an objective of Clare County Council:

- a) *To achieve the delivery of strategic, plan-led, co-ordinated and balanced development of the settlements throughout the county;*
- b) *To monitor carefully the scale, rate and location of newly permitted developments and apply appropriate development management measures to ensure compliance with the Settlement Hierarchy and Strategy, including the population and housing targets for the county.*

CDP 4.13 Planned Growth of Settlements

It is an objective of Clare County Council:

- a) *To ensure compact growth through the regeneration of brownfield sites and that the sequential approach is applied to the assessment of proposals, for development in towns and villages, and to ensure that new developments are of a scale and character that is appropriate to the area in which they are planned;*
- b) *To restrict single and/or multiple large scale developments which would lead to rapid completion of any settlement within its development boundary, and in excess of its capacity to absorb development in terms of physical infrastructure (i.e. water, wastewater, surface water, lighting, footpaths, access and similar) and social infrastructure (such as schools, community facilities and similar).*

4.4 Housing Strategy

Volume 8 of the Clare County Development Plan 2023–2029 sets out the Housing Strategy and the Housing Need and Demand Assessment (HNDA), forming the statutory evidence base for determining how and where new housing should be delivered across the county. Again, the Strategy identifies Ennis as the county’s primary settlement and the key location for accommodating a significant proportion of future population and housing growth due to its established employment base, transport accessibility and strong level of social and community infrastructure.

The HNDA projects continued population growth in Ennis over the plan period and confirms a corresponding requirement for additional housing supply to support household formation, demographic change, and sustained economic development. In order to meet this demand, the Housing Strategy emphasises the need for adequate, appropriately located and serviceable residential land, with a strong focus on compact, sequential development patterns that optimise existing infrastructure and reduce outward sprawl.

In addition to the above, Chapter 5 of Volume 1 of the Clare County Development Plan 2023–2029 addresses housing policy and sets the strategic framework for meeting current and future housing needs across the county. The Plan recognises that the provision of appropriate, high-quality and accessible housing is essential to supporting the social, economic and environmental wellbeing of communities throughout Clare.

CDP5.2 Facilitating the Housing Needs of the Population

It is an objective of Clare County Council:

- 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 Urban and Rural Settlement Strategy;*
- b) *To monitor and review the effectiveness of the Housing Strategy in meeting and resolving identified housing needs; and*
- c) *To prioritise the reuse of existing housing stock in the Plan area and the renovation and re-use of obsolete, vacant and derelict homes.*

CDP5.8 Housing Mix

It is an objective of the Development Plan:

- 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, Housing Need Demand Assessment (HNDA) and the Guidelines on Sustainable Residential Development in Urban Areas and any subsequent guidelines;*
- b) *To require new housing developments to incorporate a variety of plot sizes to meet the current and future needs of residents; and*
- c) *To require the submission of a Statement of Housing Mix with all applications for multi-unit residential developments in order to facilitate the proper evaluation of the proposal relative to this objective*

Section 4.2.3 of the Development Plan outlines the county Settlement Hierarchy and Strategy and contains a specific section on Ennis. It states that Ennis is the largest town in County Clare and Munster, the only key town in Clare, the fifth largest town in the Southern Region, and is designated a ‘Key Town’ in the RSES.

The subject lands, located on the edge of Ennis and close to existing residential areas, schools, services, and transport, represent a logical and policy-compliant location for new housing. Ennis as a town is clearly earmarked for the majority of residential development across the county given its strong position within the core strategy, settlement strategy and housing strategy as the principal town.

The lands represent a natural and sequential location for residential development and have the ability to deliver on the efficient use of infrastructure while supporting Ennis’s growth. The site aligns with the Clare County Development Plan, the National Planning Framework (2025), and Housing Growth Requirements Guidelines (2025), reinforcing its suitability for residential development. Positioned within the town’s development catchment, the lands can deliver a sustainable mix of dwellings, contributing to meeting identified housing needs and supporting population growth in County Clare.

5 ENNIS 2040 – ECONOMIC, SOCIAL AND PHYSICAL DEVELOPMENT

As part of this submission, it is worth considering how the subject lands align with the core objectives of the Ennis 2040 – Economic and Spatial Strategy. This document provides a comprehensive long-term framework to guide the sustainable growth and development of Ennis to 2040. The strategy seeks to balance population growth, housing provision, economic development, infrastructure delivery, and environmental sustainability, ensuring that Ennis continues to function as a regional economic, educational, and cultural centre while enhancing quality of life for residents.

Ennis 2040 sets out a clear approach to managing growth through a combination of compact town centre regeneration, infill and brownfield development, and strategically located greenfield expansion. It recognises the need for a diversified housing supply to meet the needs of different household types and demographic groups, alongside coordinated investment in transport, utilities, community services, and green infrastructure.

The strategy also establishes Ennis as a centre for economic opportunity, climate-adaptive development, and sustainable urban living, positioning the town as a key driver within the Limerick-Shannon-Ennis economic corridor. In this context, the identification of lands suitable for residential development plays a crucial role in supporting the objectives of Ennis 2040 and ensuring that growth is delivered in a planned, sustainable, and sequential manner.

5.1 Housing

The Ennis 2040 Economic and Spatial Strategy identifies housing as a critical driver to accommodate anticipated population growth and economic development. Ennis is projected to grow from approximately 25,000 residents to around 37,000 by 2040, creating demand for a significant increase in residential units. The strategy prioritises a mix of housing types, including apartments, family homes, and single-occupancy units, to meet the needs of a diverse population. It emphasises compact growth, sequential development, and the integration of residential development with social, transport, and green infrastructure.

Rezoning the subject site to allow for residential development would provide additional residential capacity to help meet the projected housing demand in Ennis. By facilitating a range of dwelling types in a location already connected to the neighbourhood of Ballybeg and indeed the wider Ennis area. It would also contribute to balanced growth, support population targets, and align with the compact growth objectives of the Ennis 2040 Strategy.

5.2 Population Growth

The strategy anticipates population growth of more than 30% over the next two decades, which generally aligns with the vision of the County Development Plan for its principal settlement of Ennis. This growth is driven by Ennis's role as a regional economic and educational centre, its position in the Limerick-Shannon-Ennis economic corridor, and its attractiveness to families and professionals. Ennis 2040 sets out a framework to ensure population growth is managed sustainably, through a combination of town centre regeneration, infill development, and selective greenfield expansion. The strategy also highlights the need to provide supporting infrastructure and services to meet the requirements of a growing population.

Rezoning the subject site for residential development would support the strategy's population growth targets by increasing housing availability in a sustainable, sequentially expandable location. This would help accommodate projected population increases while reducing pressure on central and brownfield sites, facilitating orderly growth in line with Ennis 2040 objectives.

5.3 Infrastructure

Ennis 2040 places strong emphasis on integrated infrastructure planning, including transport, utilities, and community services, to support sustainable growth. The strategy promotes public transport accessibility, pedestrian and cycling networks, and efficient road connectivity to ensure that new residential areas are well-served and reduce reliance on private vehicles. It also identifies the importance of water supply, wastewater treatment, energy, and digital infrastructure to support population growth and economic activity.

Rezoning the subject site would complement these infrastructure objectives, as the site is within reach of existing road networks, public transport, and essential services. Its development could be efficiently serviced, ensuring that growth is supported by existing and planned infrastructure in accordance with the strategic priorities of Ennis 2040.

5.4 Economic Development

Ennis 2040 identifies the town as a key driver of regional economic growth. It seeks to support employment creation, enhance commercial and retail opportunities, and develop Ennis as a centre for education, research, and innovation. Residential growth is recognised as integral to sustaining the local workforce, enabling people to live close to employment hubs, and supporting the viability of town centre services.

Rezoning the subject site would provide housing in close proximity to employment and educational facilities, directly supporting the town’s economic development objectives. By increasing the local population, it strengthens the labour pool, encourages local spending, and reinforces the broader economic vision outlined in Ennis 2040.

6 NATIONAL PLANNING FRAMEWORK – HOUSING GROWTH REQUIREMENTS

In response to the invitation for submissions, it is important to outline the housing need and growth requirements that Clare County Council must address under the National Planning Framework First Revision (2025) and the accompanying National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025).

6.1 National Planning Framework – First Revision

At national level, the revised National Planning Framework mandates the construction of approximately 50,000 new homes per annum with this expected to increase to 60,000 by 2030 and yet there are simply not enough zoned lands to achieve this.

The National Planning Framework (NPF) strongly advocates for compact growth, the application of a sequential development approach, and the strategic servicing of sites with public infrastructure to ensure sustainable and efficient development patterns across Ireland.

Compact Growth is a core objective of the NPF with 40% of all new housing to be delivered within our key settlements. The NPF encourages increased densities and improved liveability to achieve this (live and work in our key settlements).

Equally, the NPF promotes a sequential approach to development which essentially means that key settlements should be prioritised for development with a natural move outwards in sequence.

The servicing of sites is also a key component of the direction offered by the NPF with a tiered approach to zoning i.e. prioritising lands that are serviced over others.

6.2 NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025)

The 2025 Housing Growth Requirements Guidelines direct each local authority to revise its housing targets and development plan accordingly to ensure sufficient land is available to meet both baseline housing demand and provide additional capacity to address unoccupied sites.

The Guidelines also set out that an “additional provision” of up to 50% over and above the baseline housing growth requirement must be reflected in the Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

The following policy and objectives are notable in this context:

Policy and Objective 1

It is a policy and objective of these Guidelines that the housing growth requirements for each planning authority set out in Appendix 1 are reflected in the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

Policy and Objective 2

It is a policy and objective of these Guidelines that ‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

Revised Housing Targets

For Clare County Council, the revised baseline annual housing growth requirement has been set at 985 new dwellings per annum up to 2034, reducing slightly to 687 dwellings per annum for the period from 2035 to 2040. This represents an increase from the current Clare County Development Plan (2023–2029), which was based on an annual target of 960 units per year. These figures are explained further in the table below.

Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan – Annual Housing Requirement (Housing Supply Target)	New Annual New Housing Growth Requirement to 2034	New Annual New Housing Growth Requirement 2035-2040
550	960	985	687

Table 2 – Housing Growth Requirements for Clare County Council

What is important to again note in this context, is the requirement for an additional provision of up to 50% on the baseline housing growth requirement figures set out above. This must be catered for in the current call for residential zoned lands.

The implementation of these new targets requires Clare County Council to ensure that a sufficient supply of serviced or serviceable residential land, supported by appropriate infrastructure investment and the alignment of planning and housing delivery. The inclusion of additional sites with realistic delivery potential is therefore necessary to meet both baseline and headroom requirements.

In this context, the subject lands at Ballybeg in Ennis, represent a strategic location to assist Clare County Council in meeting its revised housing growth requirements under the National Planning Framework First Revision (2025) and the 2025 Housing Growth Requirements Guidelines.

The site is readily capable of being serviced and integrated with existing infrastructure, and its location adjacent to established residential areas and key transport corridors ensures practical and timely delivery of housing. Bringing these lands forward for residential use would contribute meaningfully to addressing the identified housing deficit, support compact and sustainable growth, and provide flexibility in the supply of zoned lands to meet both baseline and headroom requirements over the plan period.

7 REGIONAL SPATIAL & ECONOMIC STRATEGY SOUTHERN REGIONAL ASSEMBLY 2020-2032

The Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly provides the strategic planning and investment framework for the Southern Region of Ireland, translating the National Planning Framework (NPF) objectives into regional-level policy. The RSES promotes sustainable settlement patterns, compact and sequential development, strengthened town cores, and the efficient use of existing infrastructure and services. All future housing delivery within the region, including in County Clare, is required to support these core principles.

Within the RSES hierarchy of settlements, Ennis is designated as a Key Town, reflecting its strategic role as the administrative and economic centre of County Clare and its function as a major driver of population and employment growth at regional level. As a Key Town, Ennis is expected to accommodate a significant portion of the region's planned growth through sustainable intensification, infill development, regeneration, and compact expansion of its existing built-up area. The RSES emphasises that such towns must act as critical anchors for balanced regional development, providing a diverse and resilient economy, robust social and community infrastructure, and high-quality transport connectivity.

Section 3.5 in the RSES for the Southern Regional Assembly has regard to Key Towns and states the following in relation to Ennis:

“Ennis, with a population of 25,276 in 2016, is the largest town in Munster and the fifth largest settlement in the Region. The triangle of Limerick-Shannon-Ennis is recognised as the economic engine of the Mid-West. The M18 has created a greater synergy and connection between Ennis and Galway and there is potential to attract economic drivers/ infrastructure such as data centres. In this context, Ennis should build on its current talent and skills offer and attract a higher-level education campus. The preparation of the ‘Ennis 2040 Economic and Spatial Strategy’ offers an opportunity to create a long-term strategy for the sustainable development of the town.”

Regional Policy Objectives (RPOs) encourage sequential and compact growth, the targeting of at least 30% of new homes within the existing built-up footprint of larger settlements, and the co-ordination of land use and transport planning to reduce car dependency and promote more sustainable travel behaviours. Ennis is specifically identified as a town with the capacity and infrastructure to accommodate future population increases in a sustainable manner, building on its established education, childcare, healthcare, retail, and employment base.

RPO 13 Ennis

- a. *To support Ennis as a self-sustaining, regional economic driver and as a key location for investment choice in the region, to support its enhanced development based on its strategic location relative to Limerick and Galway Cities and Shannon International Airport, as well as its role as a centre of employment and economic activity within the Region. The RSES recognises that this should be supported and enhanced through initiatives such as the Atlantic Economic Corridor;*
- b. *To support the implementation of Ennis 2040 to set the long-term economic strategy for the county town with an agreed focus on an economic future and spatial pattern to 2040 and beyond. The RSES recognises the higher education growth potential of Ennis and its vision to become a centre for lifelong learning;*
- c. *To support the delivery of the infrastructural requirements identified for Ennis, subject to the outcome of the planning process and environmental assessments;*
- d. *To strengthen ‘steady state’ investment in existing rail infrastructure and seek investment for improved infrastructure and services to ensure its continued renewal and maintenance to high level in order to provide quality levels of safety, service, accessibility and connectivity including improved frequency and journey times.*

In this context, the subject lands at Ballybeg align closely with the RSES. The site's proximity to schools, established residential areas, community facilities, local services, and employment opportunities, ensures that any future development would integrate seamlessly into the urban fabric of Ennis. Development at the site would support compact growth by making efficient use of serviceable and accessible lands adjoining existing residential development.

The subject lands contribute to the RSES goals of strengthening Key Towns, delivering balanced regional growth, and consolidating urban development within areas that already benefit from strong service provision and infrastructure investment. The lands therefore represent a policy-aligned, deliverable, and

strategically located opportunity to support the region’s long-term housing and settlement strategy, consistent with the RSES and the broader national framework under Project Ireland 2040.

8 CONCEPT PROPOSAL – AN OPPORTUNITY TO DELIVER HOUSING

This submission is accompanied by an indicative site layout plan of the subject site, prepared by Sam Le Bas Architecture. The objective of this site layout is to demonstrate how the development of this site could come forward for residential development.

In summary, this submission is seeking for the rezoning of the lands outlined below from ‘Agriculture’ to ‘Low Density Residential’ or ‘Residential’ as the Planning Authority sees fit as part of any proposed variation to the Development Plan that may come forward.

The site layout plan enclosed demonstrates a coherent, policy-responsive and contextually sensitive framework for potential residential development on the subject site. While indicative at this stage – given that the primary objective is securing residential zoning – the layout illustrates how the lands can be developed in a manner that aligns with national guidance, the Clare County Development Plan 2023–2029, and the principles of compact growth.



Figure 11 – Indicative Site Layout Plan

8.1 Integration with Existing Residential

The indicative layout responds positively to the established residential pattern along Clonroadbeg Road, where individual dwellings line the street frontage in a traditional linear arrangement. The proposed access point aligns naturally with this pattern, ensuring that the development integrates with the existing neighbourhood and avoids unnecessary intrusion into the informal pedestrian environment associated with the Rocky Road public right of way – an issue that contributed to the refusal of Reg. Ref. 08/730.

Instead of relying on Rocky Road for vehicular access, the plan consolidates all traffic movements through Clonroadbeg Road, addressing previous concerns regarding traffic safety, sightlines and the protection of the heritage character of Rocky Road.

8.2 Compact Development

The proposed looped internal road and perimeter housing blocks create a compact, legible and walkable layout, consistent with CDP 4.13 principles for achieving high-quality compact growth within Key Towns. The indicative plan avoids excessive road lengths, instead providing a logical extension of the residential footprint. The layout demonstrates how the site can be developed efficiently while respecting the existing topography, which slopes gently northwards.

The use of a consolidated internal green corridor and boundary tree belts – particularly on the northern and western boundaries – retains much of the naturally occurring woodland and retains the ecological value associated with the site. As set out above the red line boundary for this submission excludes this area from the submission to ensure this area remains in use as agriculture. This approach supports the Development Plan’s environmental management objectives, ensuring that mature vegetation and landscape character are incorporated into the development rather than displaced by it.

8.3 Woodland and Landscape Features

It is worth highlighting again at the main woodland area to the north of the site has been excluded from the red line boundary of this submission to ensure that these areas remain in use as agriculture.

The layout retains the wooded areas along the western and northern boundaries, integrating these natural features into the open-space network and providing an attractive green edge to the scheme. This responds directly to the site’s existing characteristics, including pockets of scrub, naturally regenerating woodland, and established ash, oak and hawthorn specimens.

By avoiding extensive clearance of the site and instead placing dwellings inward-facing toward shared open spaces, the layout reduces visual intrusion, protects biodiversity corridors and delivers a sensitive landscape-led solution. This also addresses historic concerns identified in earlier refusals relating to the protection of important local landscape features.

8.4 Connectivity and Permeability

The positioning of internal pedestrian links – particularly the potential interface with the Rocky Road walking route – strengthens connections between Ballybeg, St. Flannan’s Drive and the wider Ennis urban area. This supports active travel and reduces reliance on the private car, aligning with national and local policy for sustainable mobility.

The layout’s clear internal hierarchy improves permeability. Importantly, it avoids using Rocky Road as a vehicular access point, resolving a core issue associated with earlier planning refusals on nearby lands.

There are existing footpaths along Clonroadbeg, which the proposal can seamlessly tie into.

8.5 Servicing

The indicative arrangement of units and street network on the site demonstrates that the lands can be serviced efficiently via conventional means, including the provision of a pumped rising main or partial gravity-fed wastewater system depending on final engineering design. The plan leaves adequate space for future pumping infrastructure if required, safeguarding delivery feasibility. This directly addresses the servicing deficiencies cited in Reg. Ref. 08/730 and reflects the significantly improved capacity context created by recent upgrades at the Clonroadmore Wastewater Treatment Plant.

8.6 Overall Assessment

In summary, the proposed indicative site layout presents a development framework that:

- Aligns with strategic and local policy objectives for compact and sequential growth.
- Demonstrates clear residential zoning suitability, showing that the site can deliver housing in a sustainable, serviceable and well-integrated manner.

- Addresses historical constraints, particularly regarding access, amenity and servicing.
- Enhances natural features, retaining woodland edges to the north and providing meaningful open space.
- Integrates sensitively with existing residential environments.
- Supports sustainable travel and neighbourhood connectivity
- Retains the relevant ecological value of the site.
- Illustrates deliverability, a key requirement under the Housing Growth Requirements Guidelines (2025)

The indicative plan therefore provides strong visual and spatial justification for the rezoning of the Ballybeg lands to residential use and confirms their capacity to accommodate high-quality future development consistent with national and local planning objectives.

9 INVITATION TO PROPOSE LANDS FOR RESIDENTIAL USES

The objective of this submission is to identify lands at Ballybeg, Ennis that can contribute to meeting Clare County Council’s revised housing growth requirements and support accelerated housing delivery in the County’s key town of Ennis. Specifically, this submission puts forward a proposal for the residential zoning of lands at Ballybeg, Ennis, Co. Clare for consideration at this time. It is considered that a rezoning from ‘Agriculture’ to ‘Low Density Residential’ or ‘Residential’ (as the Planning Authority sees fit) is the most appropriate approach in this context.

The basis for this proposal vis a vis the current non-statutory consultation is outlined below.

In support of the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* (July 2025), Clare County Council has invited submissions for lands within the County that may be suitable for residential development. This initiative aims to assist in meeting the revised housing growth requirements set out in the Guidelines.

We understand that no lands will be zoned on foot of this particular consultation. Rather any lands considered suitable for residential development following assessment by Clare County Council will come forward by way of a more formal variation of the Clare County Development Plan 2023-2029 in early 2026.

Within this context, Clare County Council are requesting proposals for lands or sites within towns or villages as identified within the settlement hierarchy (but excluding open rural countryside site) that satisfy the following requirements are brought forward:

- a. **Align with the strategic objectives for growth as set out in the Clare County Development Plan 2023-2029**

Response

The subject lands at Ballybeg, Ennis, are strategically located to support the implementation of Clare County Council’s settlement, population and housing strategy as set out in the Clare County Development Plan 2023–2029. Ennis is identified as a Key Town within the county settlement hierarchy and is intended to act as the primary focus for population growth, housing delivery and employment development over the plan period and beyond. In this context, the Development Plan anticipates that Ennis will accommodate a substantial proportion of future growth in a manner that is compact, sequential, sustainable and supported by infrastructure (Objectives CDP 3.1, CDP 3.2 and CDP 4.13). All opportunities within the Ennis context should therefore be positively considered in this call for additional residential lands.

The subject lands are located within the established suburban area of Ballybeg, a location that has been consistently identified as a residential area in previous iterations of the Development Plan. The surrounding area is characterised by mature residential estates including Rockmount Manor, Rockmount Grove, Silver Grove, Clonroad More and Killone Grove, together with long-established individual dwellings along Clonroadbeg Road. The lands therefore form part of the existing urban fabric of Ennis rather than representing peripheral or isolated greenfield development.



Figure 12 – Residential estates adjacent to the subject lands

In addition, the subject lands directly adjoin lands to the east that were previously granted permission for significant residential development under Reg. Refs. 04/2702 and 07/1779. While these permissions were not implemented, they clearly demonstrate that the planning authority has historically regarded this location as suitable for residential expansion, subject to infrastructure provision. Rezoning the subject lands would represent a logical continuation of the surrounding established developments and would consolidate the settlement pattern rather than extending development into less sustainable locations.

At a national level, the National Planning Framework – First Revision (2025), together with the Housing Growth Requirements Guidelines (2025), places an explicit requirement on local authorities to ensure that sufficient, well-located and serviceable land is zoned to meet revised housing targets. This includes the identification of additional lands beyond baseline requirements to provide flexibility and ensure deliverability. The Ballybeg lands represent a suitable opportunity in this regard, offering a strategically located site capable of contributing to housing delivery in Ennis in a manner that aligns fully with both national and local policy objectives.

- b. Are serviced, due to be serviced or serviceable over the remaining life of the Clare County Development Plan i.e. 2026-2029, or in the long term 2029-2039**

Response

The subject lands are capable of being appropriately serviced and therefore meet the infrastructural criteria required for rezoning to residential use.

As set out in the images below, there is existing water supply along Clonroadbeg to the south of the site. There is also a wastewater sewer located close to the subject site.

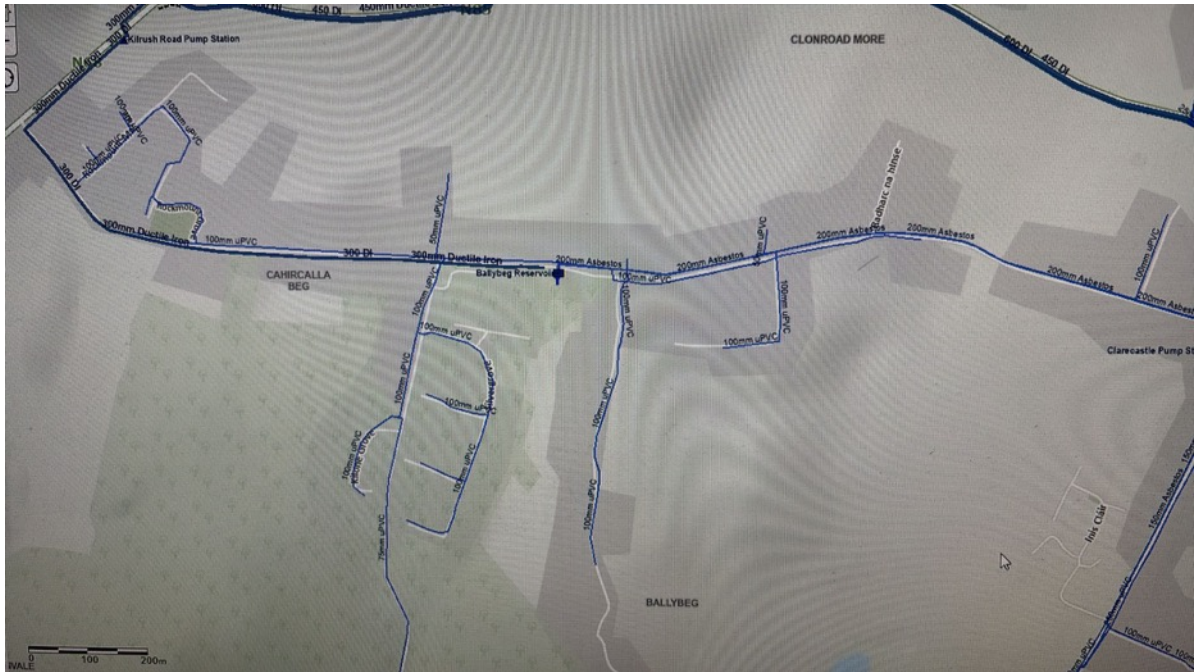


Figure 13 - Water Supply

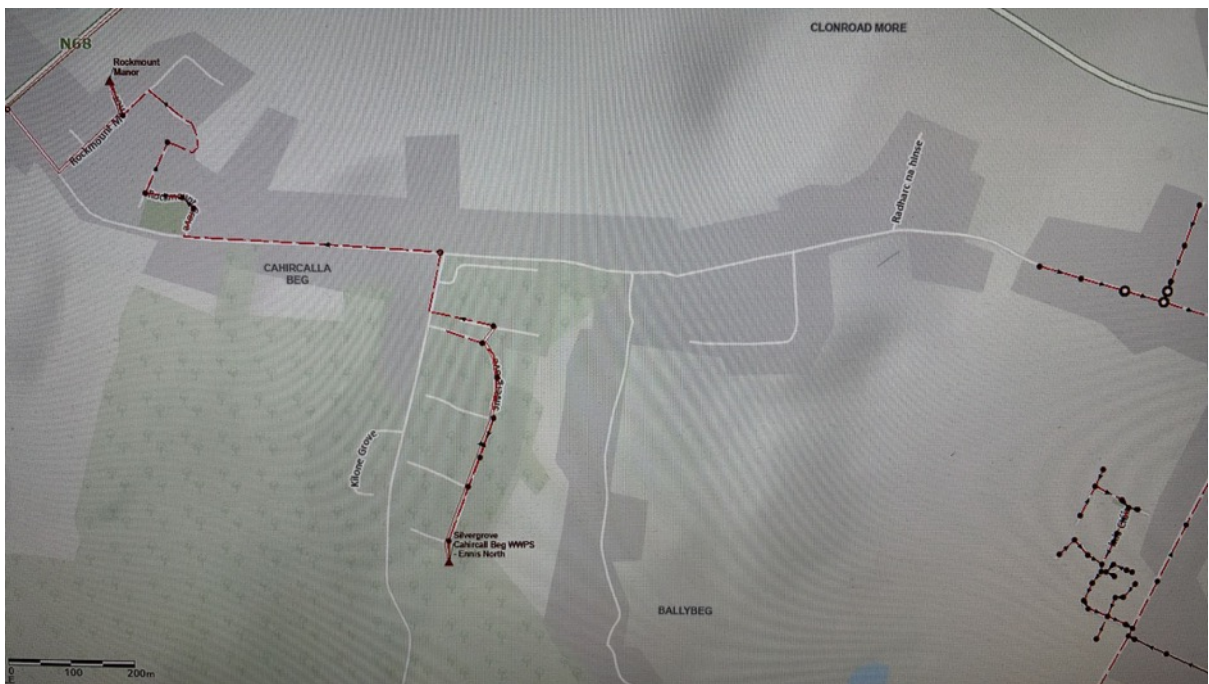


Figure 14 - Waste Water Services

The Ballybeg area benefits from an established and evolving water and wastewater infrastructure network that has undergone significant improvement in recent years. Wastewater infrastructure in the area comprises a combination of gravity sewers serving lower-lying areas, together with pumping stations at Rockmount Manor and the upper Ballybeg catchment, facilitating the transfer of flows towards the Clonroadmore Wastewater Treatment Plant.

The Clonroadmore Wastewater Treatment Plant has been upgraded in recent years, resulting in increased treatment capacity and improved environmental performance. These upgrades represent a material change in circumstances compared to the servicing context that applied at the time of earlier planning refusals in the area, including Reg. Ref. 08/730 (2008), where development was constrained primarily due to wastewater capacity limitations. The Uisce Éireann website notes that €5.2 million was invested in the Clonroadmore Wastewater Treatment Plan Upgrade and states the following in relation to this upgrade:

“The old plant served Ennis Town and operated above capacity, resulting in the plant being severely overloaded with only 30% of the wastewater it receives being treated. The remaining 70% of untreated effluent was being discharged directly into the River Fergus. The upgraded wastewater treatment plant treats all wastewater it receives to EPA standards, protecting the River Fergus and allowing for future population growth and development in the area.

Benefits

- *Ensure effluent is treated to a high standard that complies with EPA standards*
- *Reduce risk of pollution to the River Fergus*
- ***Allow for future population growth and economic development***

Steps

- ***Increasing the capacity of the plant from 17,000 population equivalent (PE) to 30,500 (PE). This will allow all wastewater to be fully treated in compliance with EPA standards.***
- *Installing preliminary treatment facilities at Tulla Road and Francis Street Pumping Stations. These facilities will help ensure a higher quality of wastewater being discharged from the Clonroadmore Wastewater Treatment Plant into the River Fergus.”*

While the subject lands occupy a relatively elevated position in relation to the nearest gravity sewer, this does not represent a constraint to development. Connection can be facilitated through the provision of a pumped rising main, or a combination of gravity and pumped drainage solutions, to be delivered as part of a future residential scheme. This approach is consistent with established practice in the Ballybeg area and is already reflected in the servicing arrangements for nearby residential estates.

Public water supply infrastructure is available along Clonroadbeg Road and is capable of serving the subject lands, subject to detailed design and confirmation at application stage. The availability of modernised water and wastewater infrastructure provides a fundamentally different context to that previously assessed and supports an infrastructure-led approach to growth in accordance with CDP Objective 5.2.

Rezoning the lands would also deliver broader environmental and public health benefits, including the opportunity to reduce reliance on individual wastewater treatment systems in the surrounding area. In light of the upgraded infrastructure and established servicing solutions in the area, the lands are considered serviceable within the remaining life of the Development Plan (2026–2029) and capable of accommodating development in the longer term (2029–2039).

The site also now benefits from the opportunity to deliver on vehicular access from the south of the site via Clonroadbeg Road.

c. Would contribute to sustainable, compact and sequential patterns of growth

Response

Rezoning the Ballybeg lands to residential use would make a positive and direct contribution to the achievement of sustainable, compact and sequential growth in Ennis. The lands are located within the existing built-up area on the edge of the town, bounded on multiple sides by established residential development and benefitting from direct pedestrian and cycling connections to surrounding neighbourhoods.

The site is situated within convenient walking and cycling distance of schools and neighbourhood centres. Kilrush Road, accessed from the site via Clonroadbeg Road, serves as the primary route connecting the site to Ennis Town. Taking this route to the town centre from the subject site is approximately an 8-minute drive – offering convenient and efficient connectivity to Ennis’s extensive range of services and amenities. These include a broad mix of retail and commercial facilities, such as Dunnes Stores, Intersport Elverys, the Ennis Bookshop, The Arc Cinema and Clare Museum. Additionally, Ennis Shopping Centre is situated on the eastern side of the town, which accommodates well-known retailers including Penneys, Tesco Superstore, and the Ennis Medical Centre. Aldi is positioned directly to the north of Ennis Shopping Centre. Ennis Hospital is located to the north of the town centre and is similarly accessible from the

subject site, with an approximate travel time of eight minutes from the subject lands in Ballybeg. This locational advantage strongly differentiates the subject lands from more peripheral greenfield sites and supports their prioritisation for development.

The lands represent a logical and sequential extension of existing residential development in Ballybeg, located immediately west of lands that were previously permitted for housing and forming one of the few remaining undeveloped land parcels of scale within the area. The presence of the Rocky Road pedestrian route along the western boundary provides a valuable active travel corridor that can be integrated into the design of future development, enhancing permeability and connectivity within the wider neighbourhood.

Rezoning would enable the comprehensive planning of the lands as a cohesive residential neighbourhood, allowing for appropriate layout, open space provision and integration with existing infrastructure. This approach would support the efficient use of existing services, reinforce the compact growth strategy for Ennis and avoid fragmented or ad hoc development.

d. Would support the development of infill housing, housing on brownfield land or address vacancy and dereliction

Response

While the Ballybeg lands are greenfield in nature, they function practically as an infill site within the built environment. While the subject lands are greenfield in character, their location and planning context mean they function in practical and spatial terms as an infill and consolidation site within the established urban area of Ennis. The lands are surrounded on multiple sides by existing residential development and associated infrastructure and represent one of the few remaining undeveloped land parcels of scale within the Ballybeg neighbourhood. Their continued underutilisation has resulted in a clear gap within the urban structure of the area, despite the availability of nearby services and infrastructure.

The Development Plan places significant emphasis on the efficient use of land within existing settlements, directing that priority be given to infill, backland and consolidation opportunities in order to limit urban sprawl and reduce pressure on rural and peripheral greenfield sites. Rezoning the subject lands to allow for residential development would directly support this objective by enabling the planned development of a site that is already integrated into the built environment and capable of being served by existing infrastructure networks.

The historical planning context further reinforces the suitability of the lands for residential development. Adjoining lands to the east were previously granted permission for substantial residential schemes, including 120 units under Reg. Ref. 04/2702 and a revised scheme of 76 units under Reg. Ref. 07/1779. Although these permissions were not implemented, they clearly establish that the planning authority has long recognised Ballybeg as an appropriate location for residential growth. Rezoning the subject lands would be consistent with this established planning approach and would allow for a coherent and coordinated redevelopment of the wider area.

Bringing the subject lands forward for residential development would address long-standing vacancy and underutilisation within the neighbourhood. It would replace an inactive landholding with a residential scheme in the future that contributes to housing supply, enhances neighbourhood vitality and improves the overall efficiency of land use in Ennis. In this regard, the rezoning of the lands represents a sustainable response to housing need that prioritises consolidation within the existing urban footprint over urban sprawl.

e. Are located in towns and villages with good social infrastructure and capacity in schools and community facilities.

Response

The subject lands are located within a well-established residential area that is supported by a strong and diverse network of social, educational, recreational and community infrastructure. This existing provision is a critical factor in assessing the suitability of the lands for residential rezoning, as it demonstrates that

future development can be accommodated without the need for extensive new public infrastructure investment.

Within walking or short cycling distance of the site are a range of recreational and community facilities including Ballybeg Woods (approximately 500 metres) which provides an important local amenity and biodiversity asset, Éire Óg Inis GAA Club (approximately 780 metres) which is a key sporting and social hub for the area and the Cahircalla Neighbourhood Centre (approximately 800 metres) which provides community, childcare and local services. These facilities contribute significantly to the quality of life of existing and future residents and reinforce the role of Ballybeg as a sustainable residential neighbourhood.

Educational provision in the area is also strong, with Ennis National School located approximately 880 metres from the site and St. Flannan’s College approximately 1.3 kilometres away, offering accessible primary and secondary education options within the town. Additional schools, including Clarecastle National School (approximately 1.7 kilometres), further contribute to educational choice and capacity in the wider area. The proximity of these facilities supports the Development Plan’s objective of directing new residential development to locations where educational infrastructure already exists or can be efficiently utilised.

The accessibility of these facilities is enhanced by the presence of established pedestrian and cycling routes, including the Rocky Road pedestrian link along the western boundary of the lands, which provides safe and attractive connections to surrounding neighbourhoods and amenities. This supports sustainable travel patterns and aligns with the Development Plan’s emphasis on active travel, community integration and the creation of healthy, walkable neighbourhoods.

Taken together, the availability and accessibility of social infrastructure in the Ballybeg area demonstrates that the subject lands are capable of accommodating residential development in a sustainable manner. Rezoning the lands would facilitate the creation of a well-integrated residential neighbourhood that is embedded within the existing social fabric of Ennis and aligned with the objectives of the Clare County Development Plan and national planning policy.

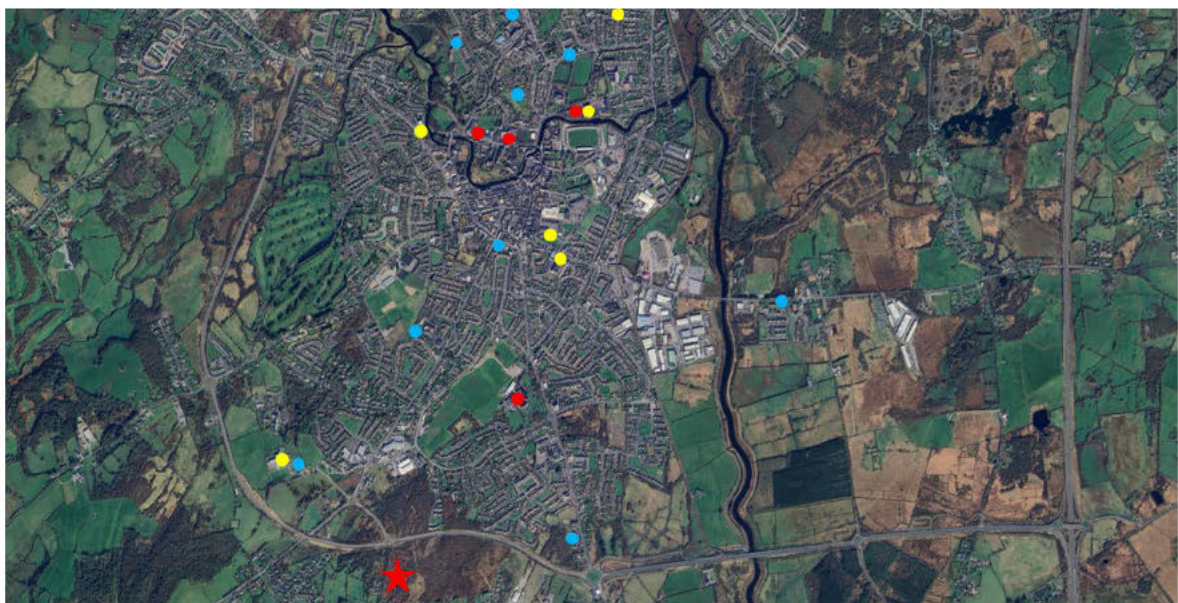


Figure 15 – Aerial view showing subject site (red star) and childcare facilities (blue), primary schools (yellow) and secondary schools (red) in Ennis

● Childcare Facility	● Primary School	● Secondary School
Lifford Childcare Creche	Ennis National School	Colaiste Muire
ABC Creche	St. Anne’s School	Gaelcholáiste an Chláir
Tiny Tots Montessori/Preschool	Scoil Chríost Rí	Rice College

Clare Family Resource Centre	CBS Primary School	St. Flannan’s College
Spraoui Early Learning Centre	Holy Family Junior School	
Little Einsteins	Holy Family Senior School	
Nurture Childcare		
Clare County Childcare Committee		
Rèalta Draìochta Preschool		

10 CONCLUSION

The subject lands at Ballybeg in Ennis represent a unique and strategic opportunity to contribute meaningfully to the delivery of Clare County’s revised housing growth requirements in line with the objectives of the National Planning Framework First Revision (2025) and the Housing Growth Requirements Guidelines for Planning Authorities (July 2025).

The site provides a clearly defined and appropriately sized area for compact and sustainable residential development, seamlessly integrating into the existing suburban fabric of Ennis. Its location immediately west of a previously approved residential scheme and adjacent to established neighbourhoods ensures that development here would form a logical extension of the built-up area. With strong accessibility to Ennis town centre, local amenities, and community infrastructure, the lands offer a well-connected and policy-compliant opportunity to support sustainable population growth and optimise the use of existing infrastructure.

The lands are serviceable, benefitting from upgraded municipal wastewater treatment capacity, localised pumping infrastructure and accessible water supply connections. The site can continue to support ecological connectivity while accommodating future residential use. No significant environmental, infrastructural or policy constraints have been identified that would preclude development, and the planning context of the wider Ballybeg area affirms the suitability of this location for housing delivery.

Taken together, the locational attributes, servicing feasibility and strong alignment with national, regional and local planning policy position the subject lands as a robust and deliverable candidate for residential zoning. Their development would contribute meaningfully to addressing the county’s housing supply needs and support compact growth within a designated Key Town.

In summary, this submission has put forward a proposal for the rezoning of lands at Ballybeg in Ennis from ‘agriculture’ to ‘residential’ and we trust that due consideration will be given to this request during the next stages of this forward planning process.

We confirm that we act for The Courtney Family and request that all future correspondence in relation to this matter be directed to this office.

Yours sincerely,



Linda McEllin

MRUP MIPI



01 559 3859