

**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 15:53:43  
**Attachments:** [REDACTED]

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To whom it may concern,

Earlier, I submitted a submission regarding Proposed Variation No. 1 of the Clare County Development Plan 2023-2029 for lands at Woodstock at 3:24pm (see below). However, I did not use the correct subject headline.

Please accept this email (and the attached submission) as the formal submission on behalf of our client, Selvaag Ireland Limited, with the correct subject headline to ensure its receipt and consideration.

Thank you

Kind Regards,

David Conway  
Assistant Planner

Brock McClure  
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T: 01 514 3279



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**From:** [REDACTED]  
**Date:** Thursday 2 April 2026 at 15:24  
**To:** "devplan@clarecoco.ie" <devplan@clarecoco.ie>  
**Cc:** [REDACTED]  
**Subject:** NPF Housing Growth - Additional Residential Lands - Lands at Woodstock

To whom it may concern,

Please find attached a submission on behalf of our client, Selvaag Ireland Limited, on

Proposed Variation No. 1 of the Clare Development Plan 2023-2029.

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

Please confirm receipt by return email in due course.

Thank you

Kind Regards,

David Conway  
Assistant Planner

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2 April 2026

**Submission to Variation No. 1  
of the Clare County Development Plan 2023-2029  
for Lands at Woodstock, Ennis, Co. Clare  
on behalf of Selvaag Ireland Limited**

Dear Sir/Madam,

We, **Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin**, on behalf of **Selvaag Ireland Limited**, [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, namely a site at Woodstock, 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 with the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025). In general terms, this variation is viewed 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 Woodstock, 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. Plan25S1-067) in respect of lands at Woodstock 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 (outlined in red)

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 Woodstock 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 and supports the key principles of compact growth.

**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 Woodstock 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 as proposed releases strategic residential reserve zoned lands and the zoning of additional residential lands for the accelerated delivery of housing targets in the short to medium term. Long Term Strategic and Sustainable Development site are also identified to indicate the potential for future delivery of housing within the next Development plan period.

Proposed Amendment No. 3 sets out proposals for the new Ennis and Clarecastle Settlement Plan (New Volume 3a(i) of the Development Plan) with proposals for New Residential Zoned sites and Long Term Strategic Sustainable Development sites set out. The lands subject of this submission do not feature as either a new Residential Zoned site or a Long Term Strategic Sustainable Development site, which is of serious concern in terms of an opportunity missed both in the short, medium and long term future development potential of readily available and serviced land proximate to Ennis town centre.

We note specifically that the Woodstock 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 over 30% population growth by 2040. The surrounding area comprises a mix of mature residential estates and recently permitted developments, including the 14-unit residential scheme under Reg. Ref. 22263, alongside established dwellings within the Woodstock neighbourhood. The site forms part of the consolidated urban fabric of Ennis, rather than representing isolated greenfield land, and provides a sequential and logical extension to the existing residential areas.

The lands lie immediately north of the approved 14-unit development permitted under Reg. Ref. 22263 and are adjacent to existing residential neighbourhoods, creating an opportunity to consolidate urban growth, strengthen local connectivity, and integrate future development into the broader Woodstock Neighbourhood. The site benefits from direct vehicular access via Shanaway Road, which lies entirely within the Ennis Plan boundary, and the landowner holds a legal right-of-way over intervening lands, ensuring that service connections can be implemented without delay. The site benefits from access to essential public services, including both the public water supply network and the public wastewater system. Existing public water and sewer infrastructure is located along the Shanaway Road, directly adjacent to the established vehicular access point serving the lands.

National policy explicitly requires local authorities to identify well-located, serviced, and deliverable lands to meet revised housing targets, including provision for additional lands to ensure flexibility and certainty of delivery. The Woodstock lands offer a realistic opportunity to contribute meaningfully to housing delivery in Ennis, optimising the use of existing infrastructure, reducing pressure on peripheral greenfield lands, and promoting sustainable urban consolidation.

**It is apparent from the proposed variation and in particular the Ennis & Environs Settlement Map that there are other sites at a more significant remove from Ennis town centre that have been favoured over the lands at Woodstock and are proposed for rezoning as residential under the variation. The Planning Authority is requested to comment on this particular point and the rationale and justification for the exclusion of the lands at Woodstock in this context.**

### **Consistency of Zoning Approach and Settlement Boundary Application**

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 and, in particular, the approach taken to the extension of the settlement boundary.



The Proposed Variation demonstrates a clear willingness on the part of the Planning Authority to amend and extend the defined settlement boundary (red dotted line) in order to facilitate the rezoning of lands for both residential and longer-term strategic development purposes. Notably, the settlement boundary has been extended and adjusted in the north-eastern part of Ennis to accommodate the rezoning of lands identified as R24 and R26. This reflects a proactive and flexible approach to plan-making, whereby the boundary is adapted to enable the delivery of housing on suitable lands. This change to the settlement boundary is evident in the images below.



Figure 2 – Existing Zoning Map (left) and Proposed Zoning Map (right) for Ennis, showing the expansion of the Settlement Boundary

However, no such consideration appears to have been afforded to the Woodstock lands. This is despite the fact that the subject site represents a logical and sequential extension to the existing built-up area and is comparable in locational and servicing terms to lands that have been included within the revised settlement boundary elsewhere.

Similarly, lands identified as R36 to the north of Ennis, located proximate to the settlement edge, have been rezoned for residential development under the Proposed Variation. In addition, adjoining lands (outlined in turquoise on the proposed zoning map) have been designated as Long Term Strategic Sustainable Development sites, namely LT1, LT3, and LT4. **The inclusion of these lands has necessitated a further extension of the settlement boundary to incorporate them within the development framework. This is identified in the images below.**

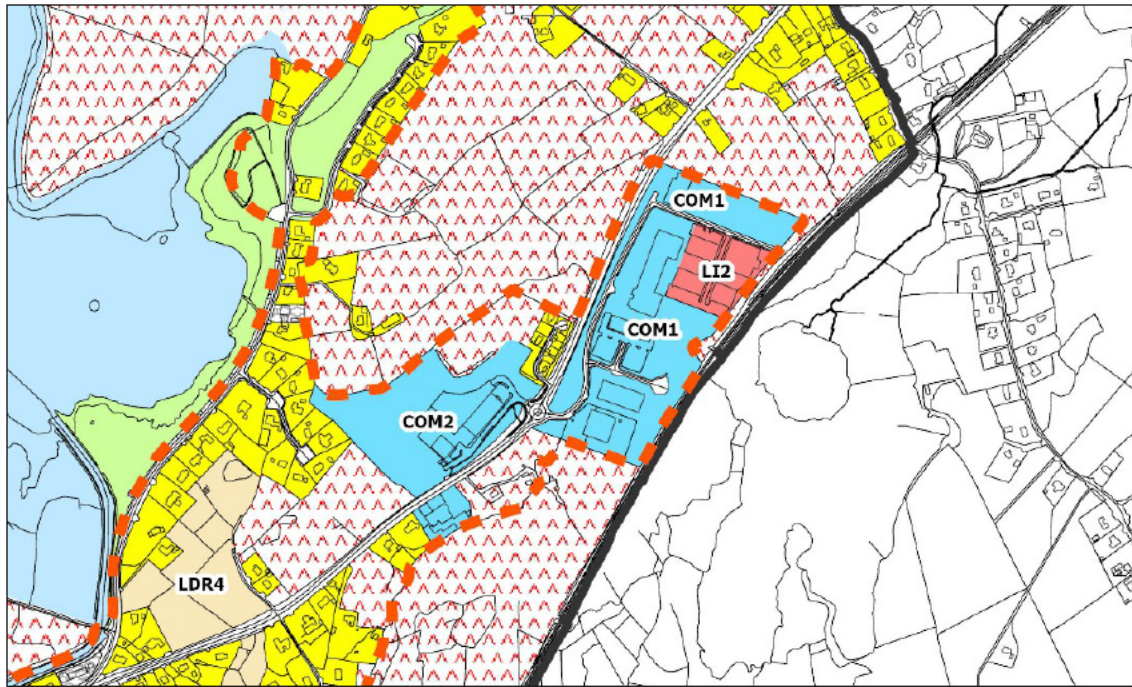


Figure 3 – Existing Zoning Map for Ennis, showing the existing of the Settlement Boundary

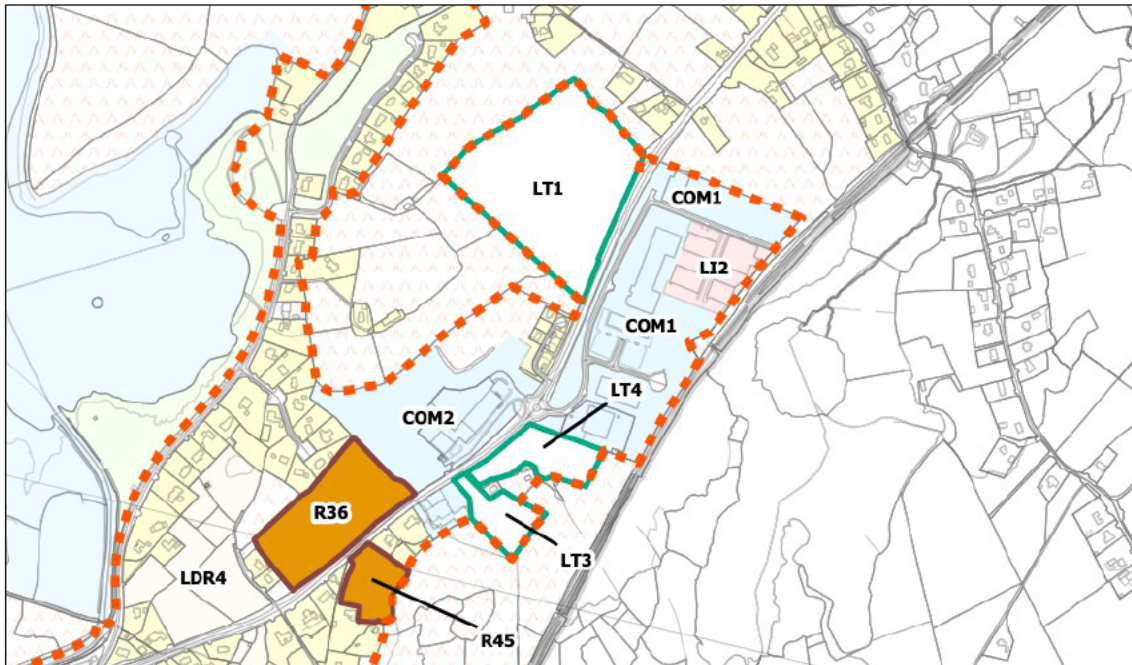


Figure 4 –Proposed Zoning Map for Ennis, showing the expansion of the Settlement Boundary and the R36 Lands

This again demonstrates that the Planning Authority has adopted an approach whereby the settlement boundary is not fixed, but rather can be extended where it is considered appropriate to facilitate development. In this context, it is unclear why a similar approach has not been applied to the Woodstock lands. The omission of the subject site is particularly difficult to understand when it is considered that the lands at R36 and the associated Long Term Strategic sites (LT1, LT3, and LT4) are located at a comparable distance from Ennis town centre, if not further removed, than the Woodstock lands. Furthermore, other lands proposed to be rezoned such as R22 and R27, which are also situated at similar or greater distances from the town centre, have been identified for residential zoning under the Variation.

In contrast, the Woodstock lands are not only similarly located in terms of distance from the town



centre, but are also directly adjacent to existing and permitted residential development. This includes established housing in the Woodstock neighbourhood and permitted development in the immediate vicinity, clearly demonstrating that the principle of residential development at this location has already been accepted.

The subject lands therefore represent a more immediate and logical opportunity for consolidation of the existing urban fabric when compared to some of the more peripheral or less integrated sites that have been included in the Proposed Variation.

In light of the above, the exclusion of the Woodstock lands cannot be reasonably attributed to their location, accessibility, or relationship to the settlement structure. Rather, it points to an inconsistent application of zoning criteria and settlement boundary adjustments.

Given that the Planning Authority has demonstrated a clear willingness to extend the settlement boundary to accommodate the rezoning of lands such as R24, R26, R36, and the Long Term Strategic sites (LT1, LT3, and LT4), it is both reasonable and appropriate that the same approach be applied to the Woodstock lands.

**Accordingly, it is respectfully submitted that the settlement boundary should be amended to include the subject lands, thereby enabling their rezoning for residential development in a manner consistent with the approach taken elsewhere in 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 Woodstock lands represent a clear opportunity in this regard. The site is in single ownership, fully serviced, and immediately available for development. It is located within the existing urban envelope of Ennis and forms a logical and sequential extension to the established residential area. Access via Shanaway Road provides a direct and efficient connection to the town centre, while nearby amenities such as Woodstock Golf & Country Club and The Banner GAA Club, in addition to schools, retail, and healthcare facilities, support the development of a sustainable and well-integrated community. There is also strong potential to enhance pedestrian and cycle connectivity to Lahinch Road and surrounding areas, promoting active travel and reducing reliance on the private car.

Furthermore, the development of the Woodstock lands would support the consolidation of the built-up area of Ennis, consistent with compact growth objectives, while making efficient use of existing infrastructure. The site offers strong potential for integration with surrounding residential areas, reinforcing neighbourhood cohesion and contributing to a high-quality residential environment.



**Accordingly, the inclusion of the Woodstock 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 serviced, well-located, and readily developable 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 Woodstock lands are a clearly defined, contiguous parcel that forms a logical extension to the built-up area of Ennis. The site is bounded on multiple sides by existing and approved residential development, avoiding isolated growth into the surrounding rural hinterland. Development of the site would represent sequential, compact, and plan-led growth, optimising the use of existing services and contributing to the consolidation of Ennis' urban footprint.

The indicative site layout prepared as part of the submission made under the non-statutory consultation in December 2025 demonstrates a tangible, cohesive and walkable residential framework. The development could incorporate a range of housing typologies, perimeter housing blocks, internal road networks, landscaped open spaces, and green corridors. Existing natural features, such as hedgerows, can be retained to enhance biodiversity and contribute to visual amenity. The development would also strengthen local permeability, reinforce neighbourhood connections, and integrate with public realm improvements in the wider Woodstock area.

The Woodstock lands are located within walking and cycling distance of Ennis town centre, key transport corridors, and community amenities, reducing reliance on private vehicles and supporting the creation of sustainable, inclusive, and adaptable neighbourhoods. This integration aligns fully with Objectives 3.1, 3.2, 4.13, and 5.2, promoting high-quality, compact growth in a Key Town.

Again, we wish to highlight that it is apparent from the proposed variation and in particular the Ennis & Environs Settlement Map that there are other sites at a more significant remove from Ennis town centre that have been favoured over the lands at Woodstock and are proposed for rezoning as residential under the variation. The Planning Authority is requested to comment on this particular point and the rationale and justification for the exclusion of the lands at Woodstock.

### **Servicing, Infrastructure and Environmental Suitability of Subject Lands**

The Woodstock lands are fully serviceable and capable of supporting residential development within the short to medium term (2026–2029) and longer term (2029–2039). The site benefits from direct access to public water and wastewater infrastructure located along Shanaway Road, with sufficient capacity to accommodate the proposed development. The landowner has a legal right-of-way over adjacent lands, allowing service connections to be installed without the need for additional acquisition. Minor upgrades required by Irish Water or other utility providers can be accommodated during construction.

Ground conditions are favourable for development, reducing the cost and complexity associated with construction. The site also offers the potential for sustainable drainage solutions, such as swales or green infrastructure, which can complement existing systems and support climate adaptation and biodiversity objectives outlined in the Development Plan.

Vehicular access is readily achievable via Shanaway Road, which lies within the Ennis Plan boundary and Woodstock Neighbourhood, and pedestrian connectivity can be extended to integrate the site with adjacent streets and the broader community. There are no identified flooding, environmental, heritage, or legal constraints that would prevent development, confirming the technical feasibility and readiness of the site for housing delivery.



**Deliverability and Readiness for Planning Application at Subject Lands**

The Woodstock lands are in single ownership and fully controlled, with completed technical assessments, existing service infrastructure, and a clear site layout. This ensures that development can be progressed immediately following rezoning, providing a credible near-term contribution to housing supply in Ennis.

The site’s proximity to existing childcare, primary and secondary education, retail, recreational, and community amenities ensures that future residents would be integrated into a well-served and sustainable neighbourhood. Local facilities within walking distance include Lifford Childcare Creche, ABC Creche, Tiny Tots Montessori, St. Clare’s School, Gaelscoil Mhíchíl Cíosóg, Ennis Educate Together, Coláiste Muire, Rice College, St. Flannan’s College, Holy Family Schools, and Scoil Chríost Rí, among others.

The combination of serviceability, accessibility, sequential integration, and environmental suitability confirms that the Woodstock lands are a “ready-to-go” opportunity for residential zoning, capable of delivering housing efficiently within the current Development Plan period.

**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 approx. 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 Woodstock against deliverability, servicing and policy criteria to demonstrate their suitability for residential zoning:

Assessment Criteria	Yes	No	Commentary
<b>Sequential &amp; Settlement Context</b>			
Contiguous with existing built-up area	✓		Adjoins established residential development.
Logical extension of settlement footprint	✓		Represents natural western growth of Ennis.
Within walking distance of town centre services	✓		Less than 4km from Ennis Town Centre
Within reasonable walking distance of public transport	✓		TFI Local Link offers a range of services. Ennis Bus Station is located 5km from the site.
Consistent with compact growth objectives	✓		Adjoins residential developments and avoids leapfrogging.
<b>Accessibility &amp; Connectivity</b>			

Existing road frontage/access potential	✓		Located within established road network south of town. Access points available from Shanaway 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.
<b>Servicing &amp; Infrastructure</b>			
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.
<b>Environmental &amp; Heritage Constraints</b>			
Located outside Flood Zone A or B	✓		Not within identified flood zone.
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.
<b>Planning &amp; Ownership Considerations</b>			
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.

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



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 Woodstock, Ennis. The concerns raised relate to the following:

- Perceived peripheral location of the site,
- Extreme groundwater vulnerability, and
- Proximity to a Special Area of Conservation (SAC).

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.

### Perceived Peripheral Location

The characterisation of the subject lands as “peripheral” is not accepted and is considered inconsistent with both the factual context of the site and the policy direction underpinning the Proposed Variation.

The Woodstock lands are located directly adjacent to the established suburban envelope of Ennis and are directly contiguous with existing and permitted residential development. The site forms a logical and sequential extension to the built-up area and does not represent isolated or leapfrogging development. On the contrary, its development would consolidate the existing urban footprint in accordance with compact growth principles.

Proposed Amendment No. 1 explicitly seeks to align the Development Plan with the NPF Implementation: Housing Growth Requirements Guidelines (2025) and the Sustainable Residential Development and Compact Settlements Guidelines, both of which prioritise the consolidation of existing settlements and the activation of serviced, deliverable lands. Similarly, Proposed Amendment No. 3 provides for the zoning of additional lands for residential use in order to accelerate housing delivery.

In this context, the exclusion of the Woodstock lands – despite their location within the existing built-up area – runs counter to the stated objectives of the Variation.

Furthermore, it is noted that other lands proposed for rezoning under Amendment No. 3, including those identified as R36, are located at a greater distance from Ennis town centre and, in some instances, do not benefit from the same level of integration with the existing urban fabric. The inclusion of such lands, to the exclusion of Woodstock, raises concerns regarding consistency, transparency, and the application of objective planning criteria. A clear justification for this approach is required.

### Groundwater Vulnerability

The issue of “extreme groundwater vulnerability”, it is not accepted that this represents a constraint that would preclude development of the subject lands. **Téire Ecological Consultants have prepared a Groundwater Vulnerability and Land Zoning Technical Memo for this site at Woodstock. Please see the Appendix of this report for full details.**

Groundwater vulnerability is a well-documented characteristic of Ennis and the wider County Clare area and has not prevented residential zoning or development in comparable locations. Notably, development has already occurred on lands immediately adjoining and in close proximity to the subject site, including permitted residential schemes, demonstrating that such conditions can be appropriately managed.

Best practice in site development, including the use of Sustainable Drainage Systems (SuDS), careful site design, and adherence to environmental protection guidelines, ensures that groundwater can be



protected effectively. There is no evidence to suggest that the subject lands are uniquely constrained or that they present risks beyond those already successfully addressed in nearby developments.

In the absence of any site-specific technical assessment demonstrating that development cannot be accommodated, it is considered unreasonable to exclude the lands on this basis. Moreover, this approach appears inconsistent when compared with other lands included in the Variation that are subject to similar environmental conditions.

### **Proximity to Special Area of Conservation (SAC)**

It is assumed that the SAC referenced relates to the Lower River Shannon SAC (Site Code: 002165), which extends through Ennis and its wider environs.

The subject lands are not located within the SAC, nor do they directly adjoin it. While they may fall within a broader zone of influence, this is a common scenario across many parts of Ennis where lands have nonetheless been zoned for development.

The planning process provides robust mechanisms to ensure the protection of European sites, including Appropriate Assessment Screening and, where required, Natura Impact Assessment. There is no evidence to indicate that development of the subject lands would give rise to likely significant effects on the SAC, particularly given the absence of direct hydrological connectivity.

It is also notable that other lands, including those closer in proximity to the SAC, have been included for residential zoning under Proposed Amendment No. 3. This further highlights an inconsistency in the treatment of the Woodstock lands.

In line with the requirements of the Habitats Directive and national policy, any future development of the site would be subject to detailed environmental assessment. However, at zoning stage, there is no reasonable basis to conclude that the lands should be excluded on this ground.

### **Summary of Feedback**

Having regard to the above, and in the context of Proposed Amendments No. 1 and No. 3 of Proposed variation No. 1, it is considered that the reasons outlined in the verbal feedback do not provide a robust or evidence-based justification for the exclusion of the Woodstock lands.

The stated purpose of the Variation is to ensure alignment with national policy, including the delivery of increased housing supply through the zoning of serviced and deliverable lands. The Woodstock lands clearly meet these criteria, representing a logical, sequential, and infrastructure-served extension of Ennis.

The exclusion of these lands, particularly when compared to the inclusion of less integrated and more peripheral sites, undermines the effectiveness and consistency of the Variation. It also risks limiting the Planning Authority's ability to meet its housing delivery targets in a realistic and achievable manner.

Accordingly, it is respectfully submitted that the Planning Authority should reconsider its position and include the Woodstock lands 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.

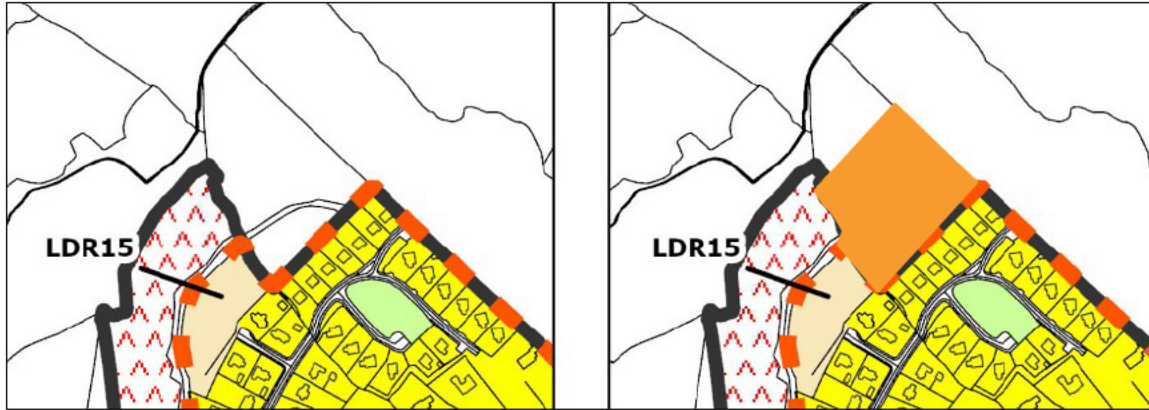


Figure 5 - Zoning Map outlining current (left) and proposed (right) zoning

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 Woodstock lands represents a clear and unjustified omission in this regard.

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

- The Woodstock lands represent a logical, sequential extension of the existing built-up area of Ennis and are directly contiguous with established and permitted residential development.
- The site is fully serviced, 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 are highly accessible, with direct access via Shanaway Road and close proximity to schools, childcare facilities, community infrastructure, and amenities, supporting the creation of a sustainable and well-integrated neighbourhood.
- The proposal is fully aligned with the objectives of compact growth, promoting consolidation of the urban footprint and efficient use of existing infrastructure.



- Proposed Amendments No. 1 and No. 3 explicitly seek to facilitate the zoning of additional, serviced, and deliverable lands; the omission of Woodstock is therefore contrary to the stated purpose of the Variation.
- There is a clear inconsistency in the zoning approach, whereby other lands (including R24, R26, R36, R22 and R27, and Long Term Strategic sites LT1, LT3 and LT4) have been rezoned and facilitated through extensions to the settlement boundary, despite being located at comparable or greater distances from Ennis town centre.
- The Planning Authority has demonstrated a willingness to extend the settlement boundary to accommodate development elsewhere; a similar approach has not been applied to the Woodstock lands without justification.
- The concerns raised in relation to the perceived peripheral location of the subject lands, groundwater vulnerability, and proximity to the Lower River Shannon SAC have been addressed and do not constitute valid constraints to development, as demonstrated in the sections above:
  - **Peripheral Location:** As outlined above, the Woodstock lands are contiguous with the existing built-up area of Ennis and adjoin established and permitted residential development. The site represents a logical and sequential extension of the urban footprint, consistent with compact growth principles and the intent of Proposed Amendments No. 1 and No. 3. As set out above, other lands proposed for rezoning under Amendment No. 3, including those identified as R24, demonstrate a clear willingness on the part of the Planning Authority to amend and extend the defined settlement boundary (red dotted line) in order to facilitate the rezoning of lands. The inclusion of such lands, to the exclusion of Woodstock, raises concerns regarding consistency, transparency, and the application of objective planning criteria. A clear justification for this approach is required.
  - **Groundwater Vulnerability:** The identified groundwater conditions are characteristic of the wider Ennis area and have not precluded development on adjacent lands. The technical assessment confirms that any potential risks can be effectively managed through standard mitigation measures and best practice design. As set out above, this approach appears inconsistent when compared with other lands included in the Variation that are subject to similar environmental conditions.
  - **Proximity to SAC:** The subject lands are neither within nor directly adjoining the Lower River Shannon SAC, and there is no evidence of likely significant effects. The planning process provides appropriate safeguards through environmental assessment at project stage. As set out above, other lands, including those closer in proximity to the SAC, have been included for residential zoning under Proposed Amendment No. 3. This further highlights an inconsistency in the treatment of the Woodstock lands.
- The exclusion of these lands represents a missed opportunity to deliver sustainable, serviced housing and undermines the effectiveness and consistency of the Proposed Variation.
- The proposed Material Alteration to rezone the lands from 'Agriculture' to 'Residential' is reasonable, evidence-based, and consistent with both national policy and the approach taken elsewhere in the Variation.

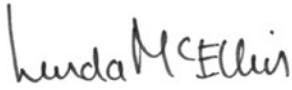
Accordingly, it is respectfully requested that Clare County Council reconsider its position and include the Woodstock lands within the zoning framework as part of Proposed Variation No. 1.

We confirm that we act for **Selvaag Ireland Limited** and request that all future correspondence in relation to this matter be directed to this office.

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

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

Yours sincerely,  
**Linda McEllin**



MRUP MIPI



01 559 3859

## **Appendix**

### **Groundwater Vulnerability and Land Zoning Technical Memo**

#### **Submission on Non-Statutory Consultation**





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## Groundwater Vulnerability and Land Zoning Technical Memo

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**On Behalf of  
Selvaag Ireland Limited**

**For a Site at  
Lands at Woodstock, Ennis, Co. Clare**

<b>Teire Project Number:</b>	<b>260012</b>
<b>Version:</b>	<b>2.0</b>
<b>Author:</b>	<b>SC</b>
<b>Date of Issue:</b>	<b>31/03/2026</b>

---

## **1 INTRODUCTION**

This document has been prepared on behalf of Selvaag Ireland Limited in relation to lands at Woodstock, Ennis, Co. Clare, which have been put forward for consideration for residential zoning through Clare County Council's recent non-statutory consultation on additional residential lands under the National Planning Framework (NPF) housing growth process (Brock McClure, 2025). The purpose of this document is to address a verbal concern raised by Clare County Council in relation to groundwater vulnerability at the site and to consider whether that issue should, in principle, preclude the lands from being considered suitable for residential zoning at this stage of the forward planning process.

Groundwater vulnerability is an environmental consideration that should be taken into account in both plan-making and development management. While a high groundwater vulnerability indicates that groundwater may be more susceptible to pollution, it does not in itself establish that a site is unsuitable for development. The relevant question is whether a proposed land use is likely to give rise to pollutants, and whether any potential risks to groundwater can be appropriately avoided, controlled and/or mitigated through design, drainage strategy, and other environmental safeguards.

These matters are typically examined in greater detail at a later stage through the planning application process, where site-specific design and environmental assessment are available to inform the competent authority. In that context, the presence of mapped groundwater vulnerability should not, of itself, be treated as an automatic impediment to the consideration of these lands for residential zoning.

This document seeks to provide a concise review of the groundwater vulnerability context at the site and outlines why the mapped groundwater vulnerability should not be regarded, in principle, as a basis for excluding the lands from residential zoning.

### **1.1 Site Location**

The lands form part of a broader area at Woodstock that has been promoted on the basis of its proximity to Ennis, its relationship with the existing built-up area, and its potential to contribute to sequential and plan-led residential growth. The submitted planning case by Brock McClure (2025) identifies that the site lies adjacent to existing residential development, adjoins lands with recent permission for a 14-unit residential scheme (Planning ref: 22263), and benefits from proximity to public water, wastewater, pedestrian, and public lighting infrastructure. The site has also been the subject of historic planning permissions including permission for a nursing home and earlier residential permissions, indicating that the principle of development at this general location has previously been accepted (Brock McClure, 2025).



 Site Boundary	<b>Map Legend</b>		
	 Ecological Consulting <a href="http://www.TeireConsulting.ie">www.TeireConsulting.ie</a> <a href="mailto:info@teireconsulting.ie">info@teireconsulting.ie</a> +353 86 824 2567		
	Drawing Title	Client	
	Site Location	Selvaag Ireland Ltd.	
	Site Location	Teire Project Code	
	Lands at Woodstock, Ennis, Co. Clare	260012	
	Drawn By	Date	
	SC	26/03/2026	
	Scale @ A4	Projection	
	1:2000	IRENET198 / Irish Transverse Mercator	

Disclaimer: Map features are approximate and for illustrative purposes only; they do not represent legal boundaries or exact locations.  
Data Sources: © OpenStreetMap contributors, licensed under the Open Database License (ODBL); Imagery © Google and its data providers, including CNES/Airbus, Maxar Technologies, and Infoterra Ltd. Contains EPA data under the Open Government Licence.

**FIGURE 1. SITE LOCATION.**

## 2 UNDERSTANDING GROUNDWATER VULNERABILITY

Groundwater vulnerability describes the natural susceptibility of groundwater to contamination arising from activities at or near the ground surface. It is concerned with the ease with which potential pollutants can move through the overlying ground and reach the groundwater body below. It is important to note that it is not a measure of status or condition which is measured separately by the Water Framework Directive (WFD), and it does not indicate that pollution is occurring. Rather, it is a measure of the degree of natural protection provided by the soil, subsoil and bedrock conditions at a given location (Geological Survey of Ireland (GSI), 2003; Department of the Environment and Local Government (DELG), Environmental Protection Agency (EPA) and GSI, 1999).

The principal factors influencing groundwater vulnerability are the permeability and thickness of the subsoil, together with the depth to bedrock, and the composition of the bedrock itself. In broad terms, where subsoils are thin and where bedrock is close to the surface, groundwater is more vulnerable because there is less opportunity for potential contaminants to be attenuated, filtered or delayed before reaching the aquifer. Conversely, where thicker and less permeable subsoils and bedrock are present, the natural protection afforded to groundwater is generally greater (DELG, EPA and GSI, 1999; GSI, 2003).

In the context of County Clare and its dominant limestone bedrock, groundwater vulnerability tends to be high due to the porous and fractured nature of limestone bedrock, which permits water to travel more easily than a bedrock such as granite. In addition, limestone forms cracks and fissures more readily than other rocks, and this is what creates the Burren and karstified landscapes that are commonly associated with County Clare.

Groundwater vulnerability mapping in Ireland is therefore intended to identify the relative ease with which groundwater may be affected by contamination, rather than to determine whether a certain type of development is likely to cause negative groundwater effects. Groundwater WFD status details the condition of the groundwater bodies. The most recent cycle of groundwater body status was conducted from 2019-2024.

Groundwater vulnerability is one component of groundwater protection and must be considered alongside the nature of the aquifer, the type of land use or activity proposed, the scale and nature of any potential pollutant loading, and the design measures available to avoid or control risk. In planning and environmental assessment terms, the presence of high or extreme groundwater vulnerability indicates that particular care is required in relation to site design, drainage strategy, wastewater management and pollution prevention. It does not, in itself, demonstrate that development cannot occur in an environmentally sensitive manner.

## 3 GROUNDWATER DATA

### 3.1 Existing Site and Surrounding Lands

A review of the GSI groundwater vulnerability mapping for the subject lands confirms that the site is located predominantly within an area of Extreme groundwater vulnerability, with a portion of the lands extending into an adjoining area mapped as High groundwater vulnerability (Figure 2) (GSI, 2026). This indicates that the bedrock beneath the site has a relatively limited degree of natural protection from contaminants introduced at or near the ground surface. It does not indicate that groundwater is currently

contaminated, nor does it demonstrate that the lands are unsuitable for development in principle. By contrast, the most recent WFD 2019-2024 assessment assigns the Ennis groundwater body an overall status of Good (Figure 3).

Review of the wider area further indicates that the subject site is not unusual in hydrogeological terms within Ennis, nor indeed within County Clare. The mapping shown on Figure 4 demonstrates that substantial parts of Ennis and its environs are located within areas classified as High and Extreme groundwater vulnerability, as well as Rock at or near the surface, which is effectively another expression of very limited natural protection. Similarly, GSI mapping indicates that the groundwater body risk status across parts of Ennis, including presently serviced and developed lands and lands already identified for development, is At Risk (Figure 5) (GSI, 2025). In that context, the existence of High or Extreme groundwater vulnerability cannot reasonably be treated as a standalone indicator that land is unsuitable for development or zoning. Were that approach to be applied rigidly, it would place significant constraint on the potential for plan-led growth across large parts of Ennis and other settlements within the county, notwithstanding the fact that such areas already contain established residential neighbourhoods, infrastructure and community uses. Taken together, these results and data from GSI indicating that the groundwater body beneath Ennis is currently in good condition, but that, due to the nature of the underlying geology, care is required to ensure that this status is maintained.

That is principally a matter for project-stage assessment and design, rather than a reason in itself to preclude zoning. At planning application stage, any future proposal would typically be subject to site-specific environmental review, including Appropriate Assessment (AA) screening and, where relevant, Environmental Impact Assessment (EIA) screening, in order to determine whether there is any realistic likelihood of significant effects arising through groundwater or other pathways (OPR, 2021; European Union, 2011; European Union, 2014). In the context of AA screening, the relevant test is whether a complete source-pathway-receptor linkage exists between the proposed activity and a European site or its qualifying features. Unless all three elements are present, there is no credible mechanism by which likely significant effects can arise through groundwater pathways (OPR, 2021).

Where no such linkage exists, groundwater vulnerability does not translate into a likely significant effect. Where a potential linkage is identified, that does not in itself mean that development cannot proceed. Rather, it means that the issue is examined in more detail through the normal statutory process. Where AA screening cannot exclude likely significant effects, Stage 2 AA may be required, at which point mitigation and design safeguards are considered in detail to ensure that effects on European sites are avoided (OPR, 2021). Similarly, EIA screening is intended to determine whether the characteristics, scale or location of a proposal are such that significant environmental effects may arise and whether further assessment is required.

In practical terms, the principal issue is not groundwater vulnerability alone, but whether contaminants are likely to be introduced to ground. During construction, this is typically addressed through standard environmental protection measures such as appropriate construction methodology, controlled storage of fuels or materials, bunding where required, and pollution prevention procedures. During operation, a residential development would ordinarily be designed with surface water management and Sustainable Urban Drainage Solutions (SuDS) measures such that runoff to ground is controlled and, in most cases, comprises relatively clean water, for example runoff from roofs and other low-risk surfaces. In that context, the presence of High or Extreme groundwater vulnerability identifies the need for appropriate

design and safeguards, but it does not, in itself, provide a reasonable basis for concluding that residential zoning of the lands is inappropriate.

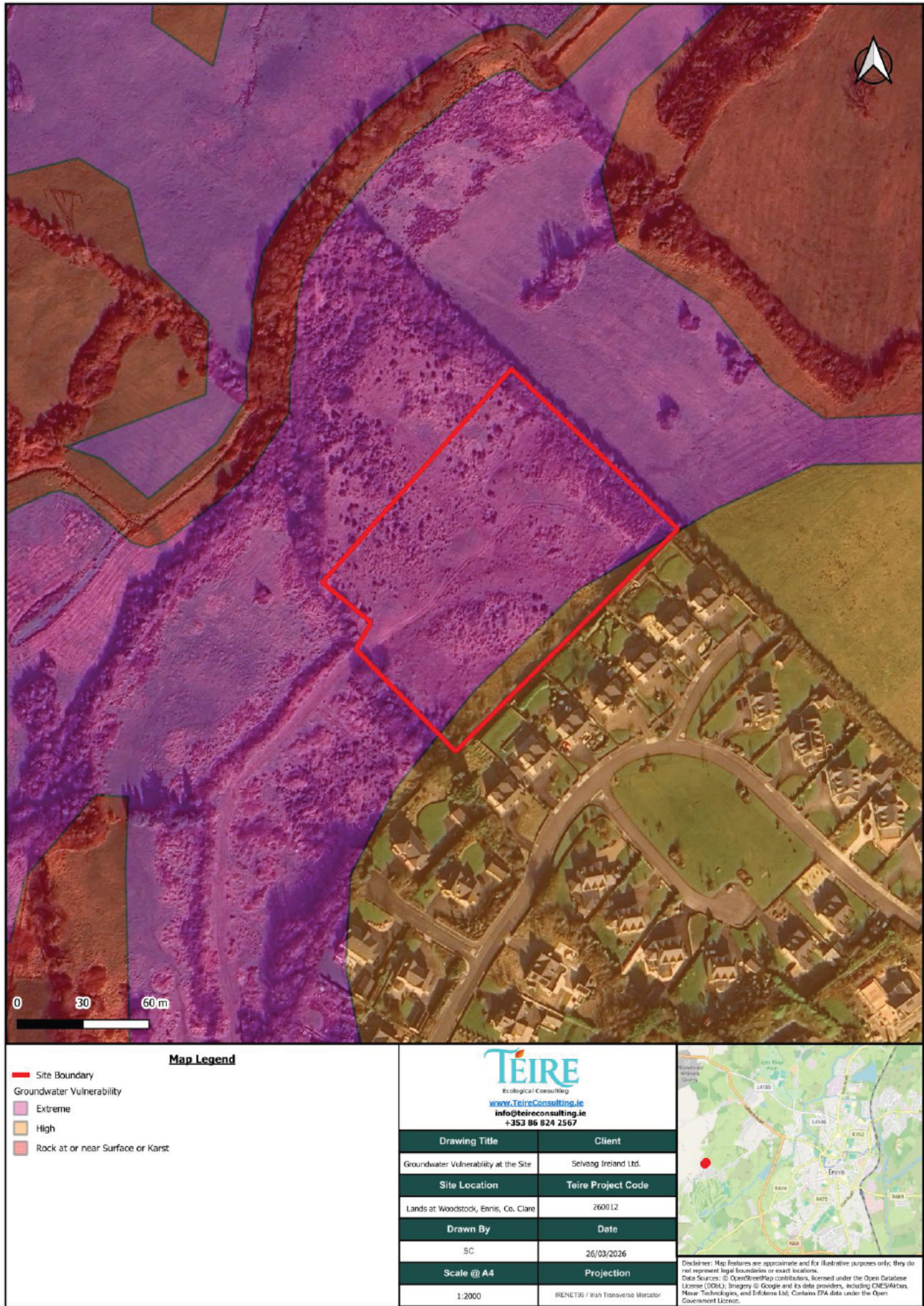


FIGURE 2. GROUNDWATER VULNERABILITY AT THE SITE (GSI, 2026).



**FIGURE 3. GOOD GROUNDWATER STATUS AT THE SITE (EPA, 2026).**

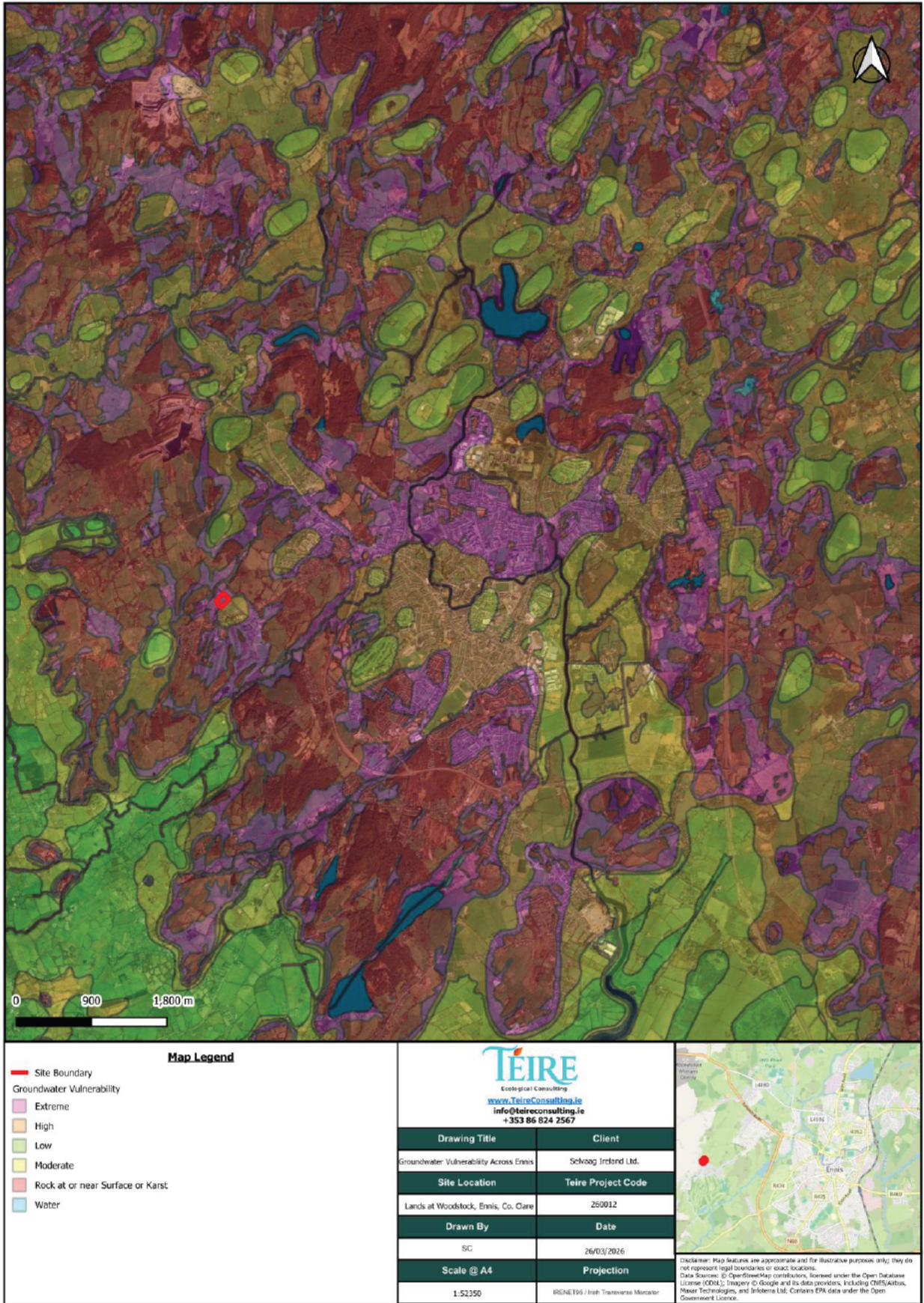
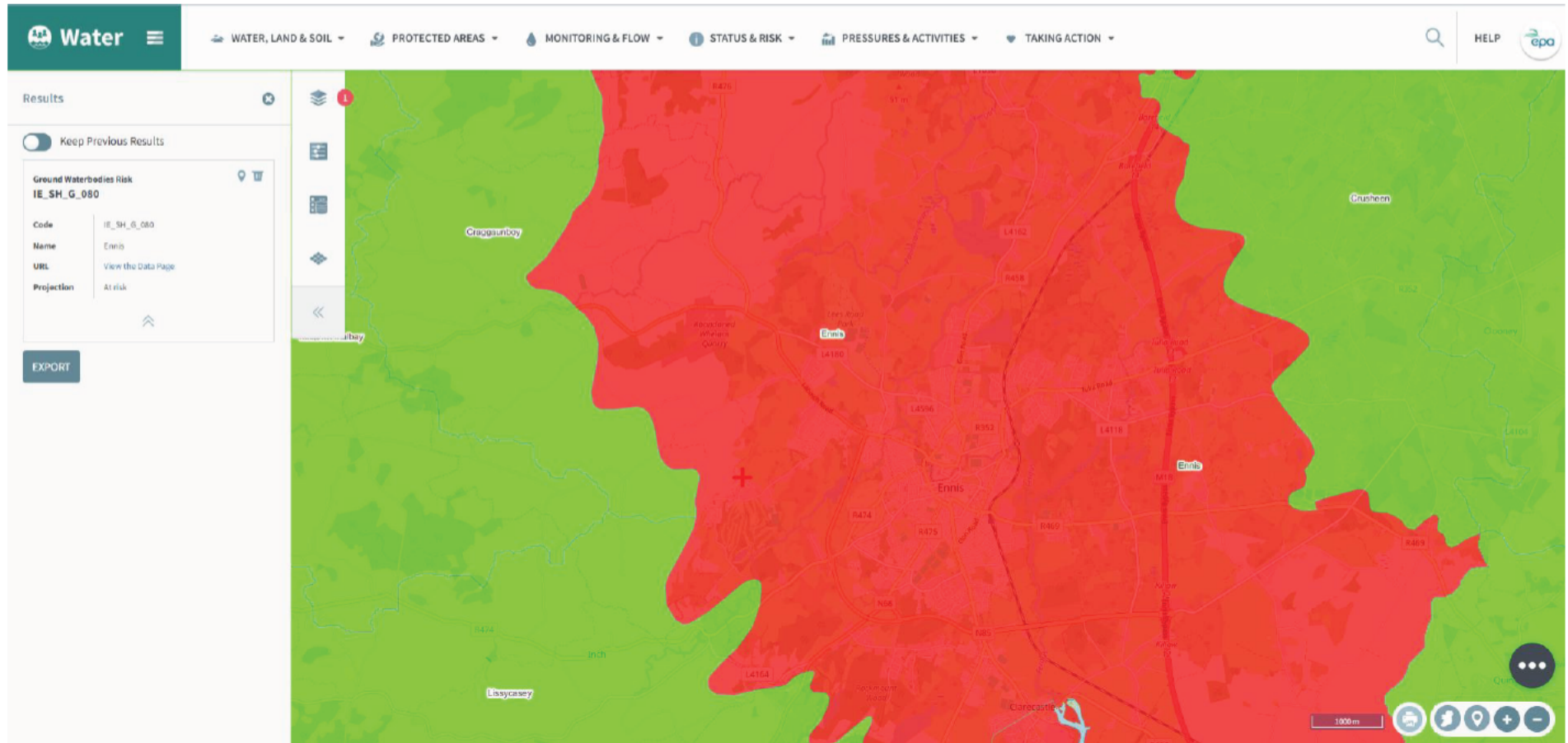


FIGURE 4. GROUNDWATER VULNERABILITY ACROSS ENNIS (GSI, 2026).



**FIGURE 5. GROUNDWATER BODY RISK ACROSS THE WHOLE OF ENNIS (EPA, 2026).**

### 3.2 Alternative Land Use Scenario

It is also relevant to consider the groundwater issue by reference to the likely alternative land use context. The subject lands are predominantly greenfield in nature and are located adjacent to agricultural lands to the north-west, while the current zoning proposal seeks to bring the site forward as a logical residential extension to the existing Woodstock neighbourhood. In practical terms, if the lands are not brought into the residential zoning framework, their medium-term use is likely to remain closer, or transition fully to the surrounding agricultural land use.

That comparison is material because groundwater vulnerability only becomes an environmental problem where contaminants are introduced and a pathway exists for those contaminants to reach groundwater. The vulnerability classification does not of itself create an impact. Rather, the issue is whether the land use in question gives rise to pollutant loading of a type and scale capable of affecting groundwater quality. In this regard, agricultural land use can present an ongoing source of diffuse and point-source pollutant risk through activities such as the application of slurry, manure, and chemical fertilisers - all of which are recognised in Irish guidance as having the potential to affect water quality if not properly managed (EPA, 2024).

By contrast, a future residential development at Woodstock would be expected to connect to the existing public wastewater network and public water supply available adjacent to the site, rather than relying on individual on-site wastewater treatment solutions. In that scenario, the principal groundwater consideration would relate primarily to the management of surface water runoff and construction-phase pollution prevention. Subject to appropriate design, this is materially different from a land use scenario in which routine nutrient application to land forms part of the ongoing use of the site.

This is not to suggest that residential development is automatically neutral in groundwater terms, nor that agriculture is inherently unacceptable. However, it is important to recognise that a properly designed residential scheme served by public foul infrastructure and supported by standard drainage, SuDS, and pollution control measures does not necessarily present a greater groundwater risk than the continuation of undeveloped or agricultural land use in a highly vulnerable setting. On the contrary, where agricultural nutrient inputs are avoided and clean surface water is appropriately managed, the potential for groundwater effects may be lower than under a land use scenario involving regular slurry, manure or fertiliser application.

## 4 CONCLUSION

Having regard to the findings of this technical memo, the presence of High and Extreme groundwater vulnerability at Woodstock should be treated as an environmental sensitivity requiring appropriate design and assessment, rather than as a standalone basis for excluding the lands from residential zoning.

The site is located within a groundwater setting that is not unusual in the context of Ennis or County Clare, where substantial areas of existing developed, serviced and zoned land are similarly underlain by High, Extreme, or rock at or near surface groundwater vulnerability. The Ennis groundwater body is also currently identified as being of good status. In that context, the mapped vulnerability classification indicates the need for care in relation to drainage, servicing and pollution control, but it does not demonstrate that the lands are unsuitable for development in principle.

Groundwater vulnerability is a measure of susceptibility, not impact. The key issue is not simply whether groundwater is vulnerable, but whether a proposed land use is likely to introduce contaminants and whether any such risks can be appropriately avoided, controlled and managed. In this regard, a properly designed residential scheme connected to public wastewater infrastructure and supported by SuDS, site-specific drainage design and standard pollution prevention measures would not necessarily present a greater groundwater risk than the likely alternative undeveloped or agriculturally influenced land use scenario. On the contrary, agricultural activities can give rise to recurring nutrient, slurry and fertiliser inputs that may present a more direct pollutant risk in a highly vulnerable groundwater setting.

The relevant planning question at this stage is therefore whether the lands are capable of being brought forward for development in a manner that is both plan-led and environmentally acceptable, having regard to the statutory assessment and design processes that would apply to any future proposal. Any such proposal would be subject, at project stage, to detailed drainage and servicing design, together with any environmental assessment required as part of the planning process.

Accordingly, while groundwater vulnerability is a relevant matter for consideration, it should not, of itself, preclude the subject lands from being considered for residential zoning. The mapped groundwater vulnerability at Woodstock identifies a matter that must be appropriately addressed through future design and assessment. It does not provide a reasonable basis, in principle, for ruling the lands out from consideration for residential use at this stage of the plan-making process.

## 5 BIBLIOGRAPHY

Brock McClure (2025) *NPF Housing Growth - Additional Residential Lands: Lands at Woodstock, Ennis, Co. Clare. Submission on behalf of Selvaag Ireland Limited*. Dún Laoghaire: Brock McClure Planning & Development Consultants.

DELG, EPA and GSI (1999) *Groundwater Protection Schemes*. Dublin: Department of the Environment and Local Government, Environmental Protection Agency and Geological Survey of Ireland.

EPA (2024) *Article 10 Report for Ireland for the Period 2020-2023*. Wexford: Environmental Protection Agency.

EPA (2026) *EPA Maps - Water: Groundwater Body WFD Status and Groundwater Body Risk Map Extracts for Ennis Groundwater Body*. Online map viewer, accessed 26 March 2026.

European Union (2011) *Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the Assessment of the Effects of Certain Public and Private Projects on the Environment*. Brussels: European Union.

European Union (2014) *Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 Amending Directive 2011/92/EU on the Assessment of the Effects of Certain Public and Private Projects on the Environment*. Brussels: European Union.

(GSI (2003) *Groundwater Vulnerability: A Guide to the Assessment and Mapping of Groundwater Vulnerability to Contamination*. Dublin: Geological Survey Ireland.

GSI (2026) *Groundwater Vulnerability Map Extracts for Lands at Woodstock, Ennis, Co. Clare and Ennis Town*. Online map viewer, accessed 26 March 2026.

Office of the Planning Regulator (OPR) (2021) *Appropriate Assessment Screening for Development Management: OPR Practice Note PN01*. Dublin: Office of the Planning Regulator.

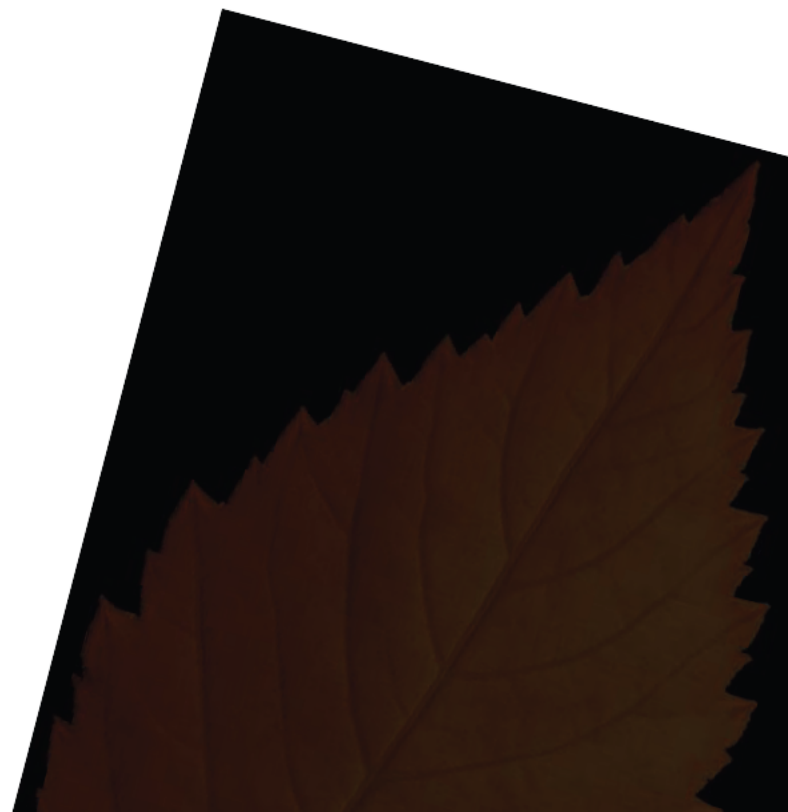
Teagasc (2025) *Organic Fertiliser Management*. Agricultural Sustainability Support and Advisory Programme Factsheet No. 3. Carlow: Teagasc.



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**NPF HOUSING GROWTH -  
ADDITIONAL RESIDENTIAL LANDS**

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

**On behalf of**

**Selvaag Ireland Limited**

18 December 2025



Planning & Development Consultants

63 York Road,

Dun Laoghaire

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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 **Selvaag Ireland Limited, Woodstock, Ennis**. This submission is made in response to Clare County Council’s non-statutory public consultation inviting proposals from relevant parties for additional residential lands that 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 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.

We understand that no lands will be zoned on foot of this 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.

**The objective of this submission is to identify lands at Woodstock, 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 ‘low density residential’ or ‘residential’ zoning of lands at Woodstock, Ennis, Co. Clare as the Planning Authority sees fit for consideration at this time.**

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*
- 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 proximity to the Key town of 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 site is located on the development boundary of the Ennis Municipal District Plan and is opportunely located to deliver on the core principles and strategic objectives of this Plan.**
- **The principle of residential development at this location provides for a logical extension of the local existing built-up area and makes efficient use of currently underutilised, serviced and ‘ready to go’ development lands.**
- **The lands directly adjoin a plot of land to the south, that recently secured planning permission for 14 no. dwellings providing for a sequential pattern of growth at this location.**
- **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.**

An indicative site layout plan outlining a proposal for this site is included with this submission.

This submission is made within the timeframe specified by Clare County Council identified as **19 December 2025**. We trust that due consideration will be given to 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 1.5 hectares and is located in the Shanaway Road/Woodstock neighbourhood at Ennis, Co. Clare. Positioned immediately north of the established Woodstock View and Woodstock Hill residential areas, the site is accessed via an existing roadway that connects directly to Shanaway Road. This access point is directly opposite the entrance to the Garville Court development to the south.

The lands are predominantly greenfield in nature, characterised by vegetation, grassland, and mature boundary planting that contributes to the site’s natural landscape setting. This existing vegetated character provides a strong buffer to surrounding residential areas and offers opportunities for integrating green infrastructure into any future development.

Shanaway Road functions as the primary access route from the site into Ennis Town. The site is located less than 4 km from the town centre – approximately a 5-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 also accessible from the subject site, with an approximate travel time of 7 minutes from the subject lands in Woodstock. Ennis Golf Club and Ennis Rugby Club are immediately south-west of the town, located approximately a 7-minute drive from the subject site.

In the immediate local context, Woodstock Golf & Country Club lies directly south of the site, while The Banner GAA Club is positioned to the south-east, providing convenient access to recreational and sporting amenities. Overall, the proximity to Ennis ensures the site is well placed to benefit from, and contribute to, the established urban fabric of the town, with ready access to schools, healthcare services, recreational facilities, employment centres, and essential community infrastructure.

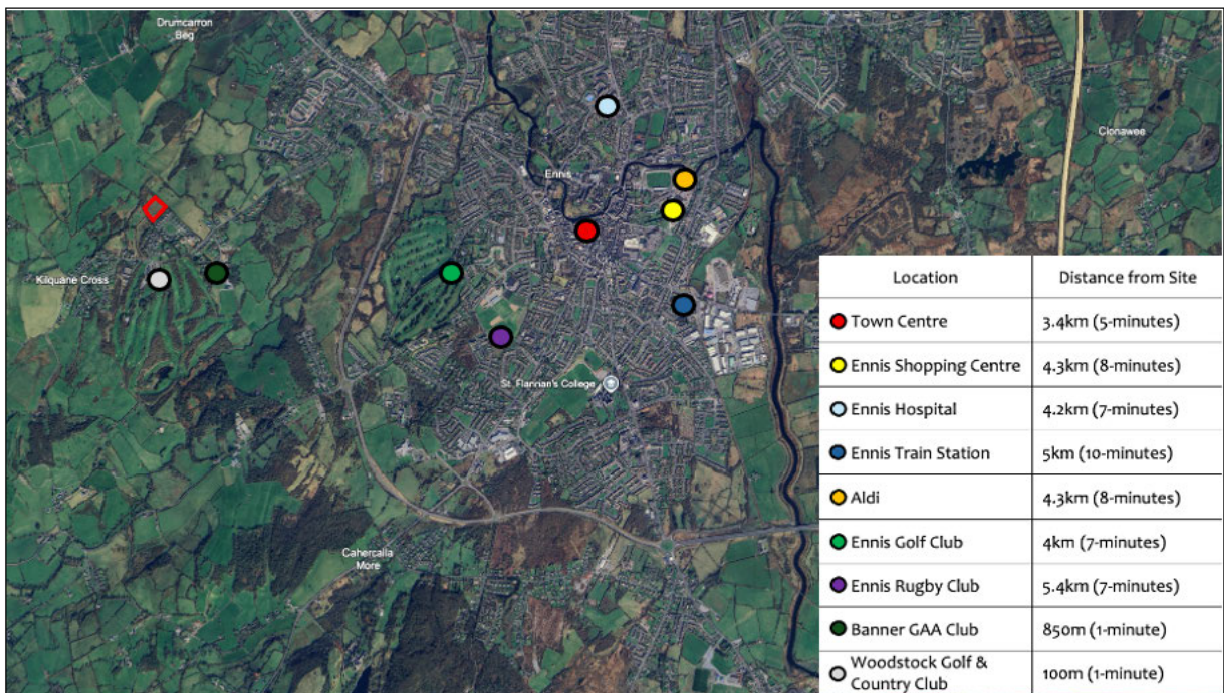


Figure 1 – Aerial view showing subject site outlined in red, and its proximity to Ennis Town Centre



Figure 2 – Aerial view showing subject site outlined in red

## 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. Ennis Bus Station is located 5km from the subject site which is approximately a 10-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
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**Table 1 – Bus routes connecting Ennis to different settlements in the region**

In addition to the above, Ennis Train Station (10-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.

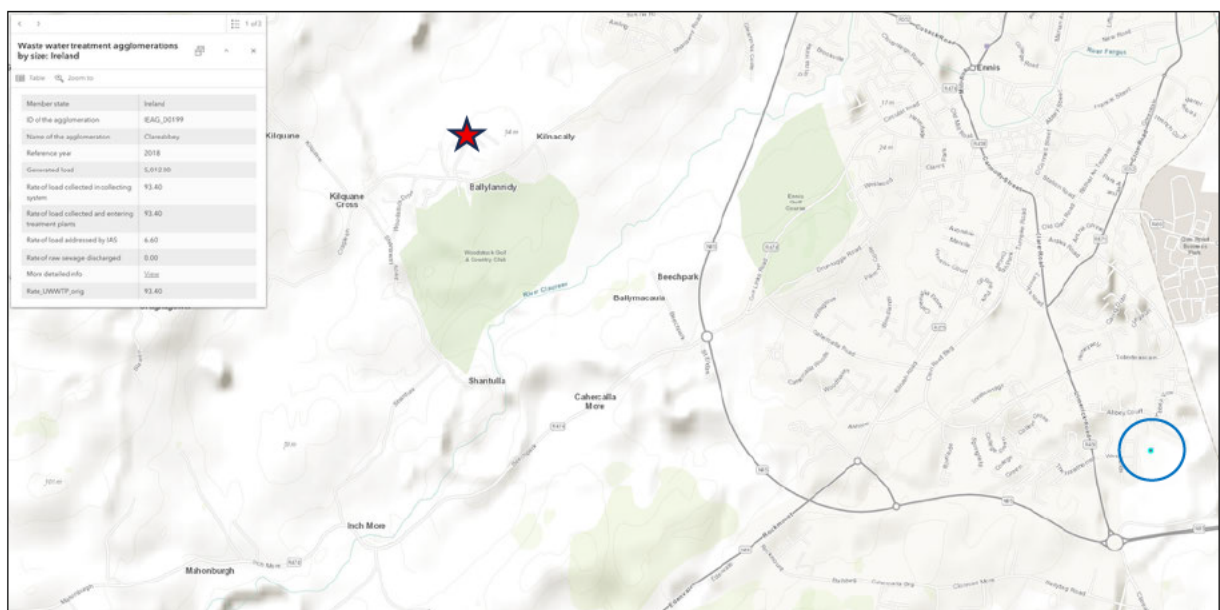
**2.2 Services**

The site benefits from access to essential public services, including both the public water supply network and the public wastewater system. Existing public water and sewer infrastructure is located along the Shanaway Road, directly adjacent to the established vehicular access point serving the lands. Importantly, the landowner benefits from a legal right-of-way over the intervening third-party lands between the subject site and the Shanaway Road, which facilitates the provision of service connections and access without dependency on additional agreements or further land acquisition.

Based on the location of existing infrastructure, the site is considered capable of being fully serviced by the public networks, subject only to standard connection works and any relevant upgrades that Irish Water (or its successor entity) may require at development stage.

From a mobility and accessibility perspective, pedestrian connectivity can also be achieved. The site carries potential to be linked to the existing public footpath network that serves the broader Woodstock neighbourhood and connects eastwards toward Lahinch Road, facilitating safe and convenient pedestrian access to nearby services, transport connections, and community facilities. Notably, there is a footpath located on the south site of the Shanaway Road. In addition, there is public lighting available along Shanaway Road.

Overall, the availability of proximate water, wastewater, pedestrian infrastructure and public lighting confirms that the subject lands are serviceable and capable of supporting residential development during the remaining period of the Clare County Development Plan and beyond.



**Figure 3 – Urban Waste Water Treatment Map 2020 of Ennis, showing subject site (red star) and Ennis South Waste Water Treatment Plan (blue circle)**

### 2.3 Site Constraints

A desktop review confirms that the subject lands are free from any notable environmental, physical, or statutory constraints that could impede their suitability for future residential development. The site is not impacted by flood risk, as it is located outside any mapped Flood Zone A or B areas, and therefore does not trigger site-specific flood risk assessment requirements under national guidance.

In addition, there are no ecological designations, protected habitats, or species-specific constraints directly affecting the lands, nor are they located within or adjacent to any Natura 2000 sites or other environmentally sensitive areas. Full analysis on this point could be carried out during the development management stage as would be normal process.

From a cultural and architectural heritage perspective, the lands do not contain or adjoin any recorded monuments, protected structures, or built heritage assets, and are not subject to any archaeological or architectural conservation designations.

The site's unconstrained status ensures that it represents a straightforward and policy-compliant opportunity for zoning and future development, with no evident environmental, heritage, or statutory impediments that would restrict its deliverability.

### 3 PLANNING HISTORY

#### 3.1 Subject site

Following a review of the online planning portal, the following previous planning applications were identified on the subject site.

Reference No.	Description of Development	Decision Date	Outcome
Reg. Ref. 99/2565	Planning permission for a nursing home & ancillary services, new access road and a turning circle of existing.	17 October 2000	Granted
Reg. Ref. 824103	Outline planning permission for the construction of a dwelling and septic tank.	14 April 1987	Granted
Reg. Ref. 813698	Outline Planning permission for the construction of 22 no. dwellings.	10 September 1979	Granted
Ref. Ref. 89236	Outlined planning permission granted on for the construction of 12 no. dwellings.	1 April 1976	Granted

*Table 2 – Outline of Planning History at subject site*

Evidently, the site has been historically considered as an appropriate location for development.

#### 3.2 Surrounding Sites

##### **Reg. Ref. 22263 (Ballylannidy, Ennis, Co. Clare)**

Planning permission was granted on 11 June 2024 for the construction of 14. no. dwelling houses in total (following amendments at further information stage) consisting of 6. no. detached dwellings and 8. no. semi-detached dwellings.

This application was appealed to An Coimisiún Pleanála (Ref. No. PL03.317090) where it was decided to uphold the decision of the Planning Authority and grant planning permission.

It was noted by the Planning Inspector in assessment of the proposal that:

- The proposed development of 14 no. units would be consistent with the character of the area.
- That proposals for roads and access to the site were acceptable.
- The site is served by a public footpath which runs along the southern side of the L4601 Shanaway Road.
- The site is serviced by mains water supply with confirmation on the file from Irish Water that the proposed development can connect to the network.
- The opposed development connects to the Clonroadmore Wastewater Treatment Plant where there is sufficient capacity to accommodate additional loading.
- A Natura Impact Assessment was included with the application and on assessment of its content, An Bord Pleanála found that the proposed development subject to the implementation of mitigation measures including construction management and operational measures that are to required standards would not adversely affect the integrity of European designated sites.

It is also worth noting that in assessment of this file, Clare County Council noted the following:

- The principle of the proposed development is acceptable at this location

- Having regard to the zoning of the site for Low Density Residential development, the policies of the Clare County Development Plan 2023-2029 and the pattern of development in the area, it is considered that, subject to conditions, the proposed development would not seriously injure the amenities of the area or of property in the vicinity and would be in accordance with the proper planning and sustainable development of the area.

**Evidently, the principle of residential development is endorsed at this location by the Planning Authority.**

The lands subject of this submission have the potential to deliver a sequential approach to development within an emerging and consolidated residential context. This potential for a sequential approach to development enhances the suitability of the site for residential development. The lands subject of this submission provide for an opportunity deliver an already serviced and accessible site, consistent with principles of compact growth and in a phased manner.

Furthermore, the subject lands are well-placed to contribute to addressing current housing demand in Ennis, providing a sequential and logical extension to existing residential development in the wider Woodstock and Ennis area. The proximity to the adjoining permitted scheme demonstrates that the site can integrate effectively into the surrounding urban fabric while making productive use of available land in line with national and local planning policy objectives promoting sustainable, compact, and sequential development patterns.

The extent of the site subject to the above permission is outlined in red below in Figure 2 with a red star marking the location for the subject site.



Figure 4 – Approved Site layout Plan under Reg. Ref. 22263, showing site of this current submission marked by red star

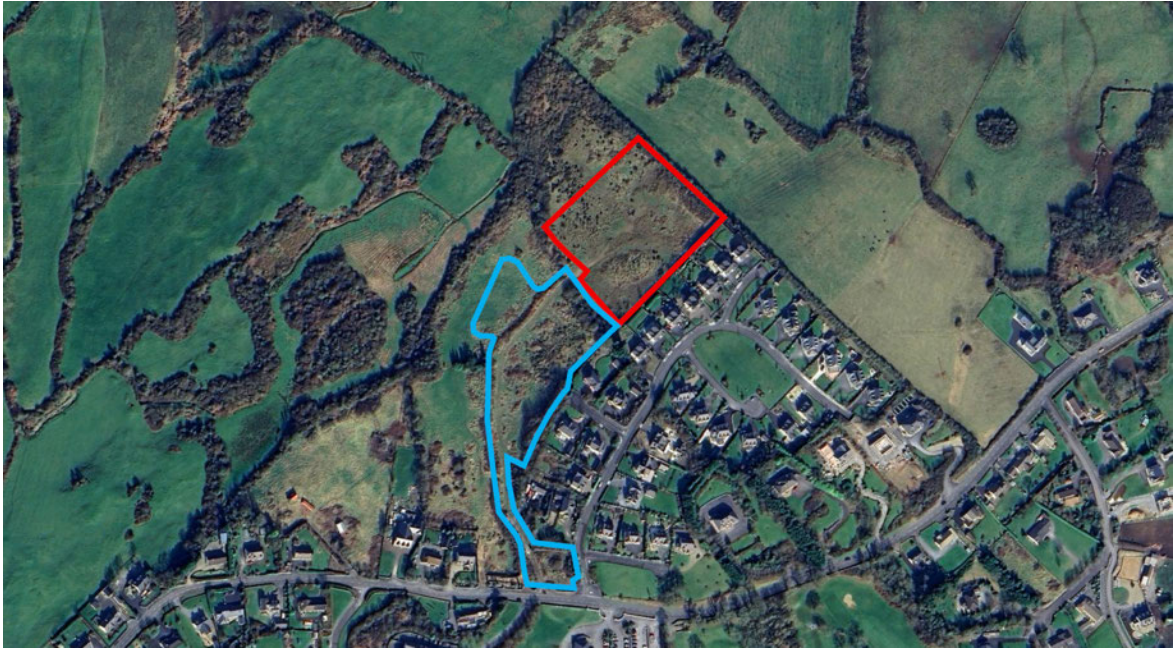


Figure 5 – Aerial view showing the subject site (red) in relation to approved Reg. Ref. 22263 (blue)

### 3.3 Clare County Development Plan Context 2023-2029

During the last Development Plan review period, a submission was made on behalf of our client to have the lands subject of this submission rezoned for ‘Community’ Use.

The general position taken by the Planning Authority at that time was that the lands were located on the western periphery of Ennis and outside of the plan boundary. It was stated that the settlement boundary was long established and should not be altered without significant reasons to do so. It was further noted that the lands were at a significant remove from the town centre and peripheral to established areas and additional zoning would militate against the achievement of a 10-minute town and compact growth. At the time, it was considered that there were significant amounts of lands zoned that are available to meet the ‘Community’ requirement.

It should be highlighted that the above commentary was made within the context of a request seeking a Community Use Designation as opposed to Residential Development.

#### Notable Points:

- The position of the Planning Authority is noted insofar as it relates to a previous proposal to have the lands zoned for community use. By contrast, the current submission is calling for a ‘residential’ zoning for this site as opposed to Community Use, a use that is established in this area.
- The lands subject of this submission are located adjacent to ‘existing residential’ and ‘low density residential’ zoned lands and are located adjacent to the Woodstock Neighbourhood. They contribute to the 10-minute settlement concept located 8 minutes from the County’s only key town - Ennis.
- There has been a recent permission for housing permitted on the adjacent site, which clearly highlights that there is support for the principle of residential development at this general location. The current proposal for a lands offering would deliver a sequential and additional phase of residential development at this location where an appropriate development context allows.
- The site is located within the Ennis Settlement Boundary as identified on page 35 of Volume 2 - Maps of the Clare County Council Development Plan 2023-2029.
- This site is serviced by public water supply, waste water supply, local pedestrian infrastructure and public lighting and therefore qualifies for consideration for residential development as a serviced site within the context of the current calling for additional residential zoned lands.

### 3.4 Summary

A review of Clare County Council’s online planning records indicates that the subject lands have a long-established planning history with the principle of development accepted at this location. The site has previously benefited from planning permission for a nursing home (Reg. Ref. 99/2565) as well as a series of outline permissions dating from 1976 to 1987 for residential schemes ranging from single dwellings to developments of 12 and 22 units (Reg. Refs. 89236, 813698, 824103). This consistent pattern of positive planning decisions confirms the development potential of the lands and supports their ongoing alignment with the principles of compact growth and the efficient use of zoned land.

To the south of the subject lands, additional recent planning activity further reinforces the suitability of this location for residential development. Planning permission was granted in June 2024 for a 14-unit residential scheme at Ballylannidy, Ennis (Reg. Ref. 22263), comprising a mix of detached and semi-detached houses. This permission was subsequently upheld on appeal by An Coimisiún Pleanála (Ref. PL03.317090), confirming the appropriateness of residential expansion in this area and demonstrating the planning authority’s support for well-located housing in line with national policy.

The subject lands, given their planning history and proximity to a recently approved residential scheme, are well positioned to contribute meaningfully to Clare County Council’s revised housing needs and to support the delivery of sustainable, plan-led development over the period to 2040. The lands clearly offer the opportunity for sequential compact growth, an approach which is strongly aligned with the objectives of the National Planning Framework and the National Planning Framework Implementation: Housing Growth Requirements Guidelines (2025). These national policies emphasise compact, sequential growth, the activation of serviced and serviceable lands, and the delivery of housing in locations with established infrastructure and services.

As set out in this section, the current proposal for a residential development at this location is considered the most appropriate use for this site and this submission will set out how the delivery of residential development at this location addresses any previous concerns raised by the Chief Executive in making the Clare County Development Plan 2023-2029.

## 4 CLARE COUNTY DEVELOPMENT PLAN 2023-2029

The 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 Plan** 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 subject site is located just outside the Ennis Plan Boundary but **is located within the Ennis Settlement Boundary as identified on page 35 of the relevant Maps contained in Appendix 2 of the Development Plan.** This map is slightly at odds with the main Ennis & Environs plan included in Volume 3a of the Clare County Development Plan 2023-2029 but this point is notable none the less.

The Ennis & Environs boundary is shown in the image below.

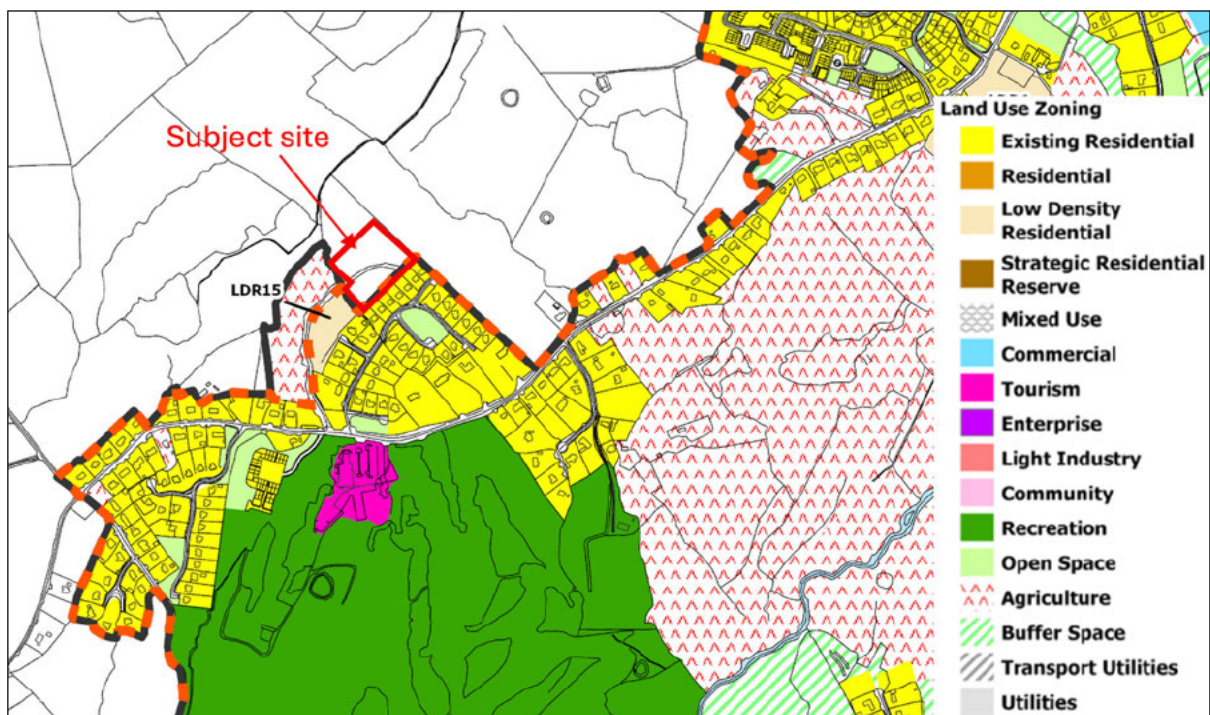


Figure 6 – Extract from Ennis & Environs Zoning Map, showing site outlined in red

It is important to highlight that the principal access to the development lands is located within the plan boundary.

Land to the south-east of the site is zoned ‘Existing Residential’. Land to the south-west of the site is zoned ‘Low Density Residential’. A 14-dwelling development has been recently approved (Reg. Ref. 22263) on this parcel of land. There are agriculture lands located to the northwest of the site.

The following Development Plan Objective in relation to the general zoning of lands is considered relevant in this context:

*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.*

Section 19.2 of the Development Plan 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 set out in this report 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 Woodstock, and maintain alignment with the broader strategic goals of the Development Plan.

#### **4.1.2 Woodstock Neighbourhood**

Section 2.11 of Volume 3a in the Clare County Development Plan 2023-2029 has regard to Woodstock Neighbourhood. The Woodstock neighbourhood, is located to the south west of Ennis town centre and includes two low-density residential zones, LDR6 and LDR15. Future development in this area is intended to consolidate the existing pattern of development, primarily through the use of infill sites. The subject site is located on the boundary of this settlement.

Development on the LDR6 lands at Shanaway Road must retain existing mature trees and hedgerows, integrating them into the overall site design and allowing sufficient space for their future growth. Any proposal must include a full bat survey, with particular attention to Lesser Horseshoe bats, and a light spill modelling study to ensure artificial lighting does not increase ambient light levels beyond the development footprint. Landscaping should be designed to enhance habitat connectivity, and proposals must address mitigation for water quality in accordance with the Natura Impact Report.

Development of the LDR15 lands must comply with Objective CDP3.3 to ensure there are no significant or adverse effects on nearby European sites. Collectively, these measures ensure that housing development in Woodstock is sustainable, ecologically sensitive, and consistent with the consolidation and infill principles set out in the Clare County Development Plan. These ‘Low Density Residential’ sites are identified below:

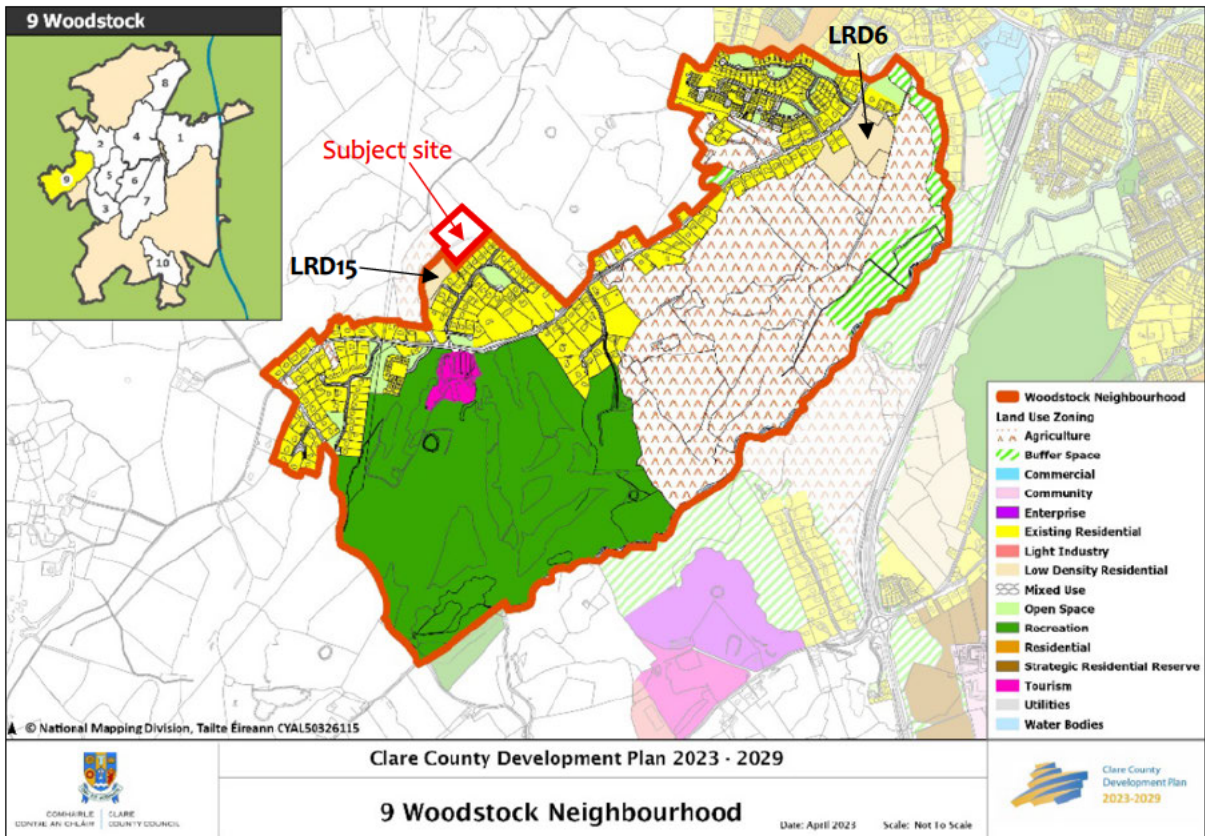


Figure 7 – Woodstock Neighbourhood Zoning Map

Evidently, the site subject of this submission is located directly adjacent to Site LDR 15 highlighting the potential the lands have to deliver on sequential development to the north west of Woodstock Neighbourhood.

It is critical to highlight that the main access to this site is located within the Woodstock Neighbourhood Centre boundary and is therefore functioning as part the neighbourhood in this context.

#### 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 Key Town 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 the key current 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 3 – 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.

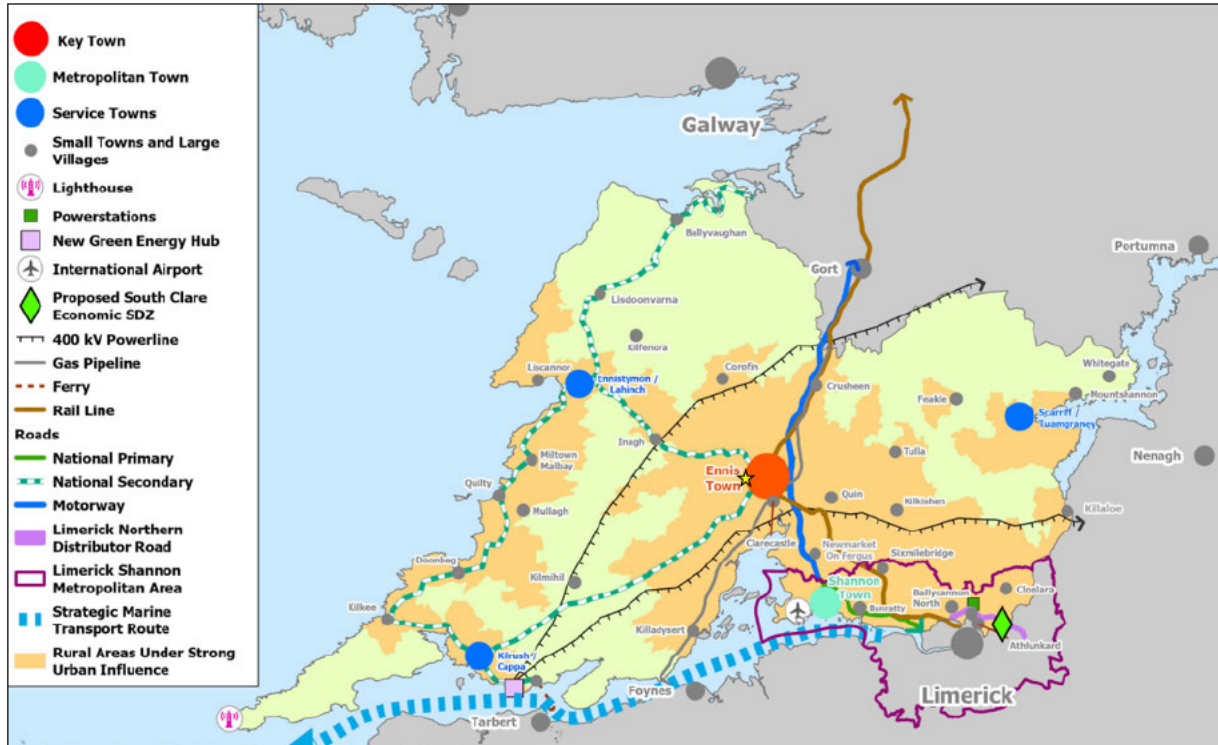


Figure 8 – Map 3A Core Strategy in the Clare County Development Plan 2023-2029, showing site marked by yellow star

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*

Ennis as a town is clearly earmarked for most residential development across the county given its strong position within the core strategy, settlement strategy and housing strategy as the principal town. Sites within the Ennis context must simply be given priority for the delivery of residential development given the primacy of the town within the overall settlement strategy.

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.

The lands represent a natural and sequential location for residential development and could 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 Woodstock 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. 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 near 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 4 – 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 now 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 Woodstock in Ennis, represent a strategically located and well-defined opportunity 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, 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 Woodstock 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. The site represents a logical and sequential extension of the town, especially in the context of adjoining residential neighbourhoods, supporting compact growth by making efficient use of serviced and accessible lands adjoining existing residential development.

The site's greenfield character and absence of environmental or physical constraints further enhance its suitability for accommodating sustainable residential development. Its potential for connection to existing

pedestrian networks and local routes also supports the RSES priority of promoting sustainable mobility and reducing reliance on private car travel.

By facilitating new housing within an established suburban neighbourhood, 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 ON HOUSING

This submission is accompanied by an indicative site layout plan of the subject site. 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 the zoning of the lands outlined below for residential development in the form of a new ‘Low Density Residential’ or ‘Residential’ zoning for the lands as the Planning Authority deems appropriate in the upcoming variation to the County Development Plan.**

The residential zoning permits a range of uses including ‘multiple residential units’ and is considered the most appropriate zoning in the context of the current call for residential lands. The zoning itself provides that ‘Residential use shall be taken to primarily include the use of land for domestic dwellings. It may also provide for a range of other uses particularly those that have the potential to foster the development of new residential communities e.g. schools, crèches and open spaces.’

This site layout plan 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 9 – Proposed Site Layout

### 8.1 Integration with Existing Residential

The proposed layout provides for 9 no. residential units in a linear format located along an internal access road. As outlined in the drawing above, the proposal follows on as a natural additional phase of development to that permitted (outlined in grey). The main arterial access route is shared and there is a natural finish to the overall development. The residential units sit well in terms of size and proximity to

adjacent permitted or existing units with appropriate separation distances ensuring the protection of existing and permitted residential amenity.

## 8.2 Compact Development

The Planning Authority will note that this parcel of land has one access route from Shanaway Road, with appropriate rights of way and wayleaves in place with the adjoining 26ocalized to ensure that the subject lands can be accessed. This access point is located within both the Ennis Plan boundary and the Woodstock Neighbourhood boundary with the site naturally functioning as part of both settlements. The current proposal supports principle of compact growth.

## 8.3 Connectivity and Permeability

From a mobility and accessibility perspective, pedestrian connectivity can also be achieved. The site carries potential to be linked to the existing public footpath network that serves the broader Woodstock neighbourhood and connects eastwards toward Lahinch Road, facilitating safe and convenient pedestrian access to nearby services, transport connections, and community facilities. Notably, there is a footpath located on the south site of the Shanaway Road. In addition, there is public lighting available along Shanaway Road.

The site layout presented also ensures that there is connectivity and permeability to the adjacent permitted development.

## 8.4 Servicing

The site benefits from access to essential public services, including both the public water supply network and the public wastewater system. Existing public water and sewer infrastructure is located along the Shanaway Road, directly adjacent to the established vehicular access point serving the lands. Importantly, the landowner benefits from a legal right-of-way over the intervening third-party lands between the subject site and the Shanaway Road, which facilitates the provision of service connections and access without dependency on additional agreements or further land acquisition.

Based on the location of existing infrastructure, the site is considered capable of being fully serviced by the public networks, subject only to standard connection works and any relevant upgrades that Irish Water (or its successor entity) may require at development stage.

Overall, the availability of proximate water, wastewater, pedestrian infrastructure and public lighting confirms that the subject lands are serviceable and capable of supporting residential development during the remaining period of the Clare County Development Plan and beyond.

## 8.5 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.
- Integrates sensitively with existing residential environments.
- Supports sustainable travel and neighbourhood connectivity
- 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 lands at Woodstock 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 Woodstock, 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 ‘low density residential’ or ‘residential’ zoning of lands at Woodstock, Ennis, Co. Clare as the Planning Authority deems appropriate.

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 Woodstock, Ennis, align comprehensively with the strategic objectives for growth as set out in the Clare County Development Plan 2023–2029. Ennis is designated as the only Key Town in the county and is identified as the principal settlement in County Clare, targeted to accommodate over 30% population growth by 2040. The Plan emphasises the delivery of sustainable, compact, and sequential growth in Ennis, particularly through the consolidation of existing residential areas and the provision of serviced, sequentially located land (CDP Objectives CDP 3.1, CDP 3.2, and CDP 4.13).

The Woodstock site lies immediately north of the recently approved 14-unit residential development (Reg. Ref. 22263) and adjacent to established residential areas, providing a logical and policy-compliant extension of the built environment. Its development would support Core Strategy, Settlement Strategy and Housing Strategy objectives by optimising the use of existing infrastructure, delivering plan-led housing growth, and facilitating sustainable population growth within Ennis in accordance with the Settlement Hierarchy.

Furthermore, by providing additional serviced land within proximity to the town centre, the site directly supports the Ennis 2040 Economic and Spatial Strategy, which seeks to promote sustainable urban consolidation, enhance town centre vitality, and provide for a range of housing types to meet current and future demand.

In addition to aligning with the broader settlement strategy, the lands assist in delivering several of the Plan’s spatial objectives on a site-specific basis. The site’s location within an established residential catchment ensures that future development can be phased in a manner that supports balanced population distribution across Ennis, while contributing to the targeted reinforcement of neighbourhood centres identified in the Plan. We note the sites context near Woodstock Neighbourhood.

The site’s relationship with existing housing also allows for the creation of an integrated urban edge, strengthening local permeability, supporting future public realm enhancements, and facilitating the delivery of higher-quality neighbourhood design consistent with the Development Plan’s design guidance. The lands also present an opportunity to diversify the town’s housing supply in a key town – such as through a mix of typologies, tenure options, and age-friendly units – advancing the CDP’s emphasis on inclusive and adaptable communities.

- 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 readily serviceable and can support residential development within both the short-to-medium term (2026–2029) and the longer-term period (2029–2039). We note the following images which outline the extent of services available at this site.



Figure 10 – Local Water Supply Network

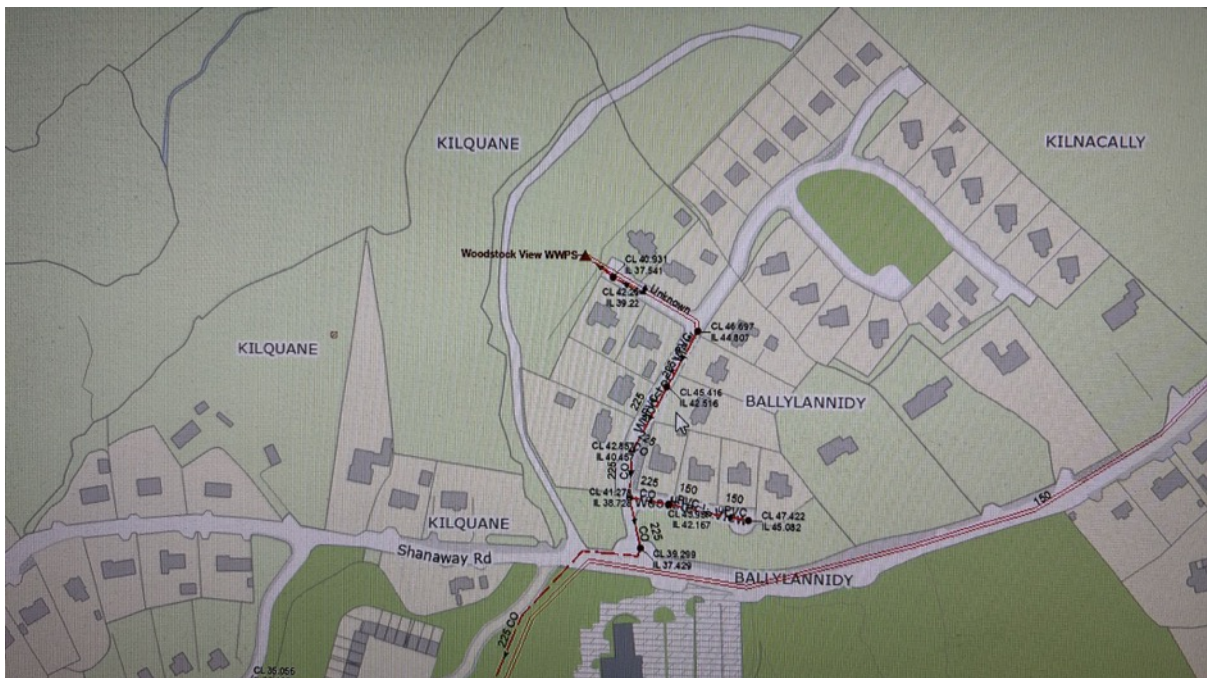


Figure 11 – Local Waste Water Network

Evidently, the site benefits from immediate proximity to public water and wastewater infrastructure located along Shanaway Road, directly adjacent to the vehicular access. The landowner has an established legal right-of-way over the intervening lands, ensuring that service connections can be implemented without the need

for additional land acquisition. Minor works or upgrades, if required by Irish Water or its successor entities, can be accommodated at the development stage.

The main access to this site is via Shanaway Road and it is critical to highlight that this access point is located within both the Ennis Plan boundary and the Woodstock Neighbourhood. This is the main access point to the site.

The Clare County Development Plan (CDP 5.2, CDP 4.13) emphasizes that housing growth should be delivered on land that is fully serviceable, optimising existing infrastructure and ensuring the efficient delivery of homes. Pedestrian infrastructure can also be extended to integrate with the surrounding Woodstock neighbourhood and connect to Lahinch Road, promoting sustainable mobility and active travel. The site's serviceability ensures that residential development can be delivered in a timely and cost-effective manner, fully consistent with the Plan's objective to provide appropriately serviced lands for future housing growth.

Beyond the existing proximity to utilities, the site benefits from favorable ground conditions that support cost-effective servicing and construction, reducing overheads typically associated with more constrained urban infill sites. Its position adjoining a primary access route also simplifies the sequencing of construction works and service installation, allowing for efficient coordination between utility providers and future development phases. Additionally, the site's scale offers potential to incorporate localized sustainable drainage measures, such as swales or green infrastructure, which can complement existing systems and support climate-adaptation policies outlined in the CDP. These characteristics collectively ensure that the lands can be brought forward in a predictable, technically straightforward manner that aligns with the Council's infrastructure investment priorities.

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

#### **Response**

The site at Woodstock is ideally positioned to contribute to sustainable, compact and sequential growth, consistent with the objectives of the Clare County Development Plan and national policy under the National Planning Framework. The Plan (CDP 4.13 and CDP 5.2) emphasises that compact growth, prioritizing infill, brownfield, and backland development is a focus.

The site is coming forward as backland plot or additional phase of development directly adjoining a recently permitted residential scheme, offering a sequential and logical extension of the existing urban fabric. Development here would make efficient use of underutilised land, avoiding urban sprawl, and would integrate with the surrounding residential context to deliver a cohesive, walkable neighbourhood.

The sites location within walking and cycling distance of Ennis town centre, key transport corridors, and community amenities further supports sustainable patterns of development, reducing car dependency and facilitating connectivity. This approach seeks to promote compact, sequential, and plan-led growth that optimises the use of infrastructure and supports sustainable communities.

The Woodstock site offers a range of additional benefits that reinforce its contribution to sustainable and sequential growth. Its immediate adjacency to the recently approved 14-unit development (Reg. Ref. 22263) and established Woodstock residential areas creates a natural extension of the built environment. This adjacency provides the opportunity to integrate access, streetscapes, and public open space across the two developments, creating a coherent neighbourhood structure with legible pedestrian and vehicular movement patterns.

From a connectivity perspective, the site is less than 4 km (5 minutes by car) from Ennis town centre, providing direct access to a wide range of services and amenities, including retail, medical, educational, and recreational facilities. Local amenities within walking distance, such as Woodstock Golf & Country Club to the south, The Banner GAA Club to the south-east, and green corridors within the Woodstock neighbourhood, support active travel, recreational opportunities, and community cohesion. The proximity to main transport routes, including Shanaway Road, ensures convenient access for residents while facilitating efficient servicing and infrastructure delivery. Pedestrian and cycle links could be extended to Lahinch Road and surrounding neighbourhoods, promoting sustainable mobility, reducing reliance on private vehicles, and aligning with national active travel objectives.

The development of these lands would also allow for sensitive urban design interventions, including varied housing typologies, appropriate densities, and thoughtful integration with existing streetscapes.

Opportunities exist to retain and enhance existing natural features, hedgerows, and open space, reinforcing ecological networks and supporting biodiversity. The lands could incorporate local green infrastructure, such as pedestrian linkages, small open spaces, and sustainable drainage systems, contributing to environmental sustainability while enhancing neighbourhood amenity.

In addition, sequential development on this site supports Ennis's broader objectives under the Ennis 2040 Economic and Spatial Strategy, which emphasizes compact urban growth, town centre vitality, and the provision of diverse housing types. By consolidating the Woodstock neighbourhood and utilising a backland plot for development, the site optimises existing infrastructure, reduces pressure on more peripheral lands, and strengthens Ennis's settlement hierarchy.

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

**Response**

While primarily greenfield in nature, the Woodstock site functions as a strategic infill opportunity within the existing Woodstock residential neighbourhood, consistent with the sequential and compact growth principles outlined in CDP 4.13 of the Development Plan. Again, it adjoins a recently approved residential development (Reg. Ref. 22263), effectively making it a backland plot that can accommodate additional housing within the existing urban footprint and the main vehicular access point servicing the site is located within relevant plan boundaries.

By facilitating residential development in this location, the site promotes efficient use of available land and infrastructure, avoids unnecessary expansion of the settlement boundary, and contributes to the consolidation of Ennis's urban area. CDP 5.2 and CDP 4.13 support the activation of underutilised lands to meet housing demand, complementing infill and brownfield development initiatives. The site provides an opportunity to deliver additional housing in a manner that is compatible with the surrounding area, helping to meet the town's identified housing need while optimising existing urban capacity.

The scale and configuration of the site make it well suited to providing a variety of infill housing options that respond sensitively to its surrounding built context. The lands offer scope to deliver appropriately scaled densities that transition smoothly between existing housing and future development areas, reinforcing a coherent residential character. The site also allows for urban design solutions that incorporate overlooked pedestrian links, underused open spaces, and fragmented boundaries typical of backland locations, allowing these elements to be rationalised into a more legible and functional urban pattern.

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

**Response**

The Woodstock site is located within an established residential neighbourhood of Ennis, where a strong network of social, educational, and community services is already in place to support sustainable population growth. The area is well served by a wide range of childcare providers, including full-day care, preschools, and community-based early years services, ensuring that families have access to appropriate childcare options within proximity to the site.

The locality also contains a significant concentration of primary education facilities, comprising mainstream, Gaelscoil, Educate Together, religious, and special education provision. This diversity ensures that sufficient capacity and choice are available for new households, aligning with CDP 5.2, which emphasises the importance of locating new residential development where adequate educational and community infrastructure exists, and CDP 4.11, which seeks to strengthen settlement networks through the consolidation of population growth in well-served areas.

Secondary school provision within Ennis is equally comprehensive, offering a mix of schools, including both English- and Irish-medium options. The scale and variety of existing post-primary options demonstrate the town's capacity to accommodate additional student demand arising from future residential development at Woodstock.

Taken together, this extensive range of childcare, primary, and secondary educational services ensures that the Woodstock site is exceptionally well positioned to support new residential development without requiring significant new social infrastructure investment. Integrating additional housing into this already well-served neighbourhood will reinforce Ennis’s role as the county’s primary urban centre, support compact and sequential growth, and contribute to the creation of a balanced, inclusive, and sustainable community.

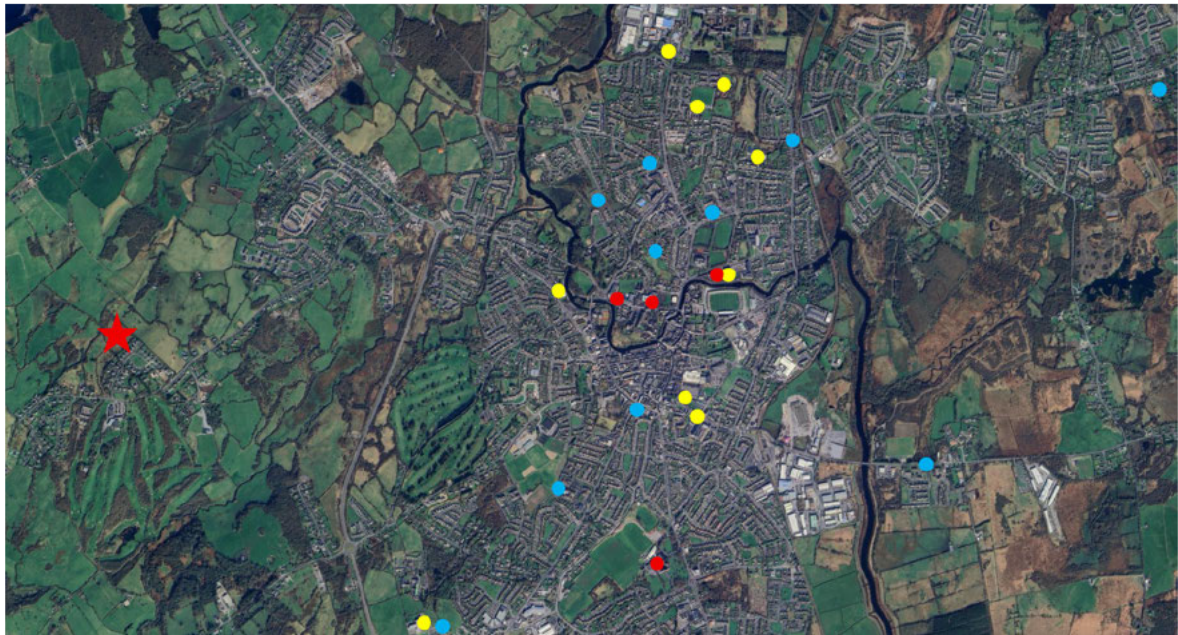


Figure 12 – Aerial view showing subject site (red star) and childcare facilities (blue), primary schools (yellow) and secondary schools (red) in Ennis

● Childcare Facility	● Primary School	● Secondary School
Lifford Childcare Creche	St. Clare’s School	Colaiste Muire
ABC Creche	Gaelscoil Mhíchíl Cíosóg	Gaelcholáiste an Chláir
Tiny Tots Montessori/Preschool	Ennis Educate Together	Rice College
Clare Family Resource Centre	CBS Primary School	St. Flannan’s College
Teach Abhaile Child Care	Holy Family Junior School	
Little Einsteins	Holy Family Senior School	
Nurture Childcare	Scoil Chríost Rí	
Clare County Childcare Committee	St. Anne’s School	
Réalta Draíochta Preschool	Ennis National School	
Little Scholars Preschool		

Table 5 – List of childcare facilities, primary schools and secondary schools in proximity to the subject site

**10 CONCLUSION**

The subject lands at Woodstock 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 north of an approved residential scheme and adjacent to established neighbourhoods ensures that development here would form a logical, sequential 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.

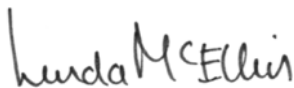
The lands are readily serviceable, benefitting from adjacent public water and wastewater infrastructure and a legal right-of-way that facilitates straightforward connection. The main access to the site is located within the Woodstock Neighbourhood and Ennis plan boundaries. With no significant environmental, heritage, or physical constraints, the site represents a viable and efficient location for housing delivery within both the remaining lifetime of the Clare County Development Plan (2023–2029) and the longer-term period to 2040. The established pattern of positive planning decisions on and around the site further confirms its longstanding recognition as suitable for development.

Taken together, the site’s locational advantages, serviceability, and alignment with national, regional, and local policy objectives position it as a strong candidate for inclusion as future residential lands. Its development would support compact urban consolidation, optimise existing infrastructure, and contribute meaningfully to the delivery of high-quality homes in Ennis in accordance with the county’s strategic growth framework.

**In summary, this submission has put forward a proposal for the ‘low density residential’ or ‘residential’ zoning of lands at Woodstock, Ennis, Co. Clare 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 Selvaag Ireland Limited and request that all future correspondence in relation to this matter be directed to this office.

Yours sincerely,



**Linda McEllin**

MRUP MIPI



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