



Clare County
Development Plan
2023-2029

Draft Clare CDP 2023-2029 - Public Consultation Portal

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Volume 1

Core Strategy, Settlement Strategy and Housing

Volume 3(a) Ennis Municipal District Written Statements and Settlement Maps

Ennis/Clarecastle

Volume 3(b) Shannon Municipal District Written Statements and Settlement Maps

Volume 3(c) Killaloe Municipal District Written Statements and Settlement Maps

Volume 3(d) West Clare Municipal District Written Statements and Settlement Maps

Associated Documents

None of the above

Environmental Reports

None of the above

Your Submission

Location Map

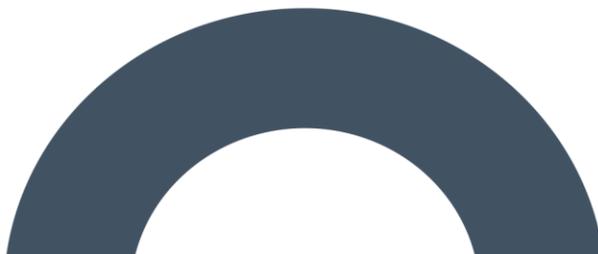


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Submission to the Draft Clare County Development Plan 2023-2029

Lands at Knockanean,
Ennis, Co. Clare



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1.

INTRODUCTION

We note that Clare County Council are in the review process of the existing *Clare County Development Plan 2017-2023* and preparation of a new development plan for the period 2023-2029 is underway. On behalf of our client, Drumquin Construction Ltd, we wish to make a submission in respect of the Stage 2 (Draft) of the *Clare County Development Plan 2023-2029* (hereinafter referred to as the Draft Plan) which was published on the 10th December 2021 and will be on public display until the 28th of March 2022.

We acknowledge that the development plan for the period 2023-2029 is being prepared in a changed context to the existing plan 2017-2023. New policy documents have been issued since the adoption of the *Clare County Development Plan 2017-2023*, in which there is a new hierarchy of spatial plans that support the strategies of the Development Plan. A more urgent national focus on climate change mitigation and adaptation with implementation of the National Climate Action Plan will be required to guide the drafting of policy. Relevant policy documents that have supported the context of the Draft Plan include:

- Project Ireland 2040: National Planning Framework
- Regional Spatial and Economic Strategy for the Southern Region 2020-2032
- National Climate Action Plan

MKO have been appointed by Padraig Howard to prepare this submission on his behalf, to the Draft Clare County Development Plan 2023-2029, and in particular *Volume 3a Ennis Municipal District*. This submission is in response to the fact that the site is currently zoned for 'Low Density Residential Development' in the Clare County Development Plan 2017-2023 and that it is proposed to downzone the land to 'Open Space' in the draft Clare County Development Plan 2023-2029.

2. SITE LOCATION & CONTEXT

2.1 Site Location & description

The subject site is located in Knockanean in the north-eastern suburbs of Ennis, Co. Clare. The site is a semi-developed residential development site that has a long history of positive planning decisions bounded to the south by Cappagh Lawn Road (Knockanean Road), to the east by a cluster of residential developments, and to the north and west by established residential estates. The site is serviced by road and footpath (as part of a recently permitted development). This particular area of the town is characterised by low density, detached dwellings.

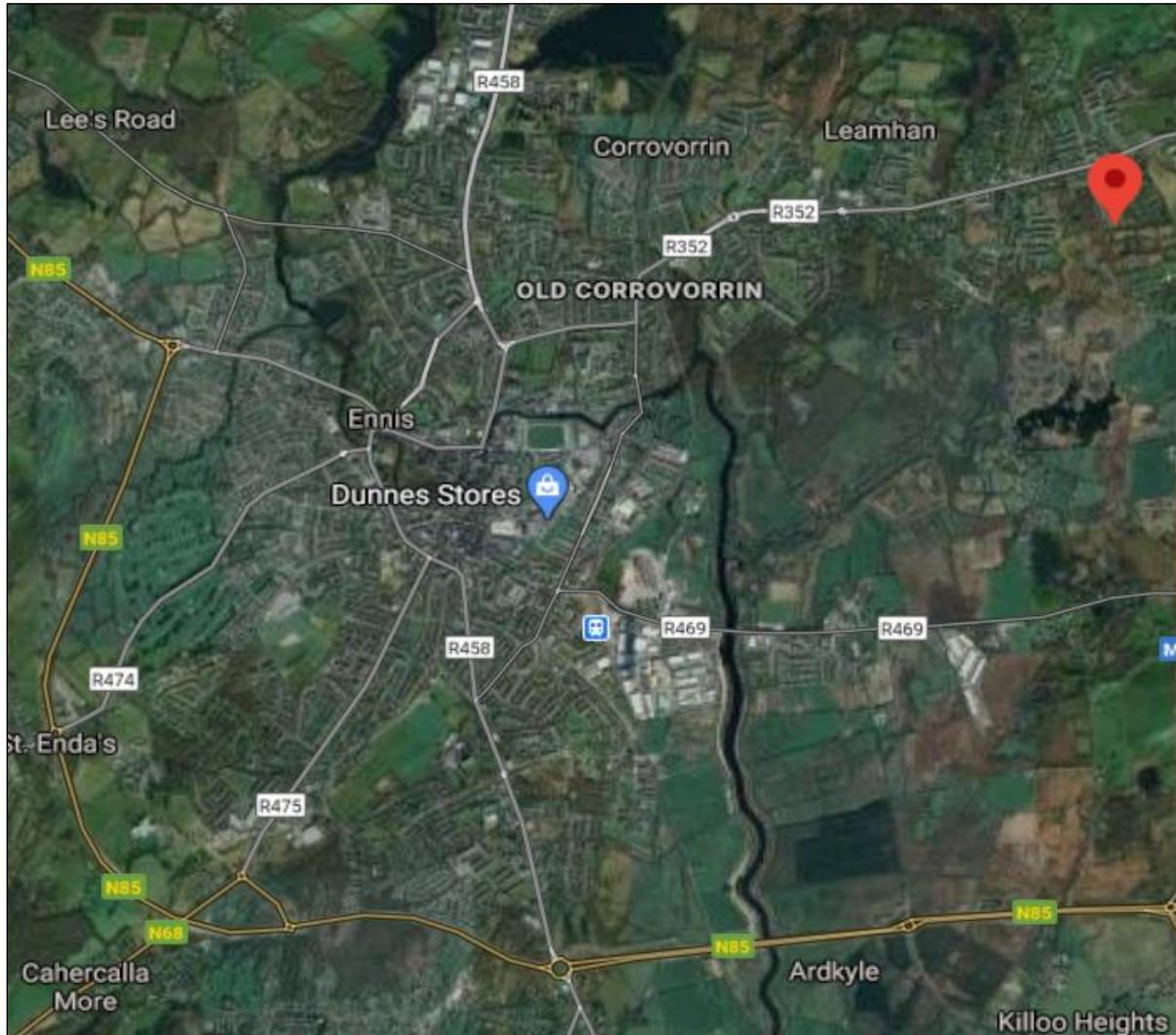


Figure 1: Site location in the context of Ennis town and existing development (site identified by red waypoint marker)



Figure 2: Lands the subject of this submission outlined in red

2.2 Amenities & Community Facilities

There are several shops, petrol stations, amenities and services within walking distance of the site, including a Pre-School, An Daingin and Knockanean Primary School, a Church, Fahy Hall Community Centre, a bakery and a vets all within reasonable walking distance of the site. Roslevan neighbourhood centre is also located in close proximity to the subject lands.

2.3 Services

The site is fully serviced with **on-site connections** to water and sewer infrastructure previously built under granted permission P08/21134. The Planning Authority will note that a residential development has been very recently granted planning permission for a residential development on the site under P21/512. This development proposal includes for connection to existing services and demonstrates clearly that the subject site is fully serviceable. We appreciate that the recently granted permissions P21/512 & P21/861 are subsequent to the publication of the draft plan and in that regard we hope that the plan can be updated to reflect the recently permitted development at the site, as was applied to other such sites in the area such as LDR8 and LDR5. As proven under P21/512 & P21/861, onsite service connections have been approved by Irish Water for the completion and development of this site.

3. PLANNING HISTORY

A search of Clare County Council’s planning history identifies a number of relevant applications for the site, see below in Table 1.

Table 1: Planning History

| Ref No. | Applicant | Development Description | LA Decision |
|---------|---------------------------------|--|---|
| 0621019 | Leo & Grainne Mannion | on the grant of outline permission (planning register reference no. 04/129) to construct 12 no. houses with associated site works and connection into local authority foul water sewer | Granted Permission on 19.01.2007 |
| 0821134 | Aiden Bohannon | revisions to previously approved grant of Planning Permission ref:P06/19 to construct 12 no. houses with associated site works and connection to Local Authority foul water sewer as follows: Construction of 2 no. houses types B fronting Main Road in lieu of 1 no. house type A as granted. | Granted permission on 18.11.2008 |
| 1121073 | Aiden Bohannon | Extension of Duration of planning permission reference 06/19 for the construction of 12 detached houses, access road, paths, green areas and all common and ancillary services | Granted Permission on 02.02.2012 |
| 16743 | Aiden Bohannon & Padraig Howard | for development which will consist of the construction of 13 No detached dwelling houses including the completion of access road, site development works, public service connections, which have been substantially completed under previous permission granted for this site under Planning Ref P06-21019 and extended under Planning Ref 11-21073. | Withdrawn |
| 21512 | Padraig Howard | the construction of 13 no. detached dwelling houses including for all site development works, site landscaping and public service connections, some of which have been substantially completed under previous permissions granted on this site under Planning Ref P06-21019 and extended under Planning Ref 11-21073. The proposed development includes for the provision of a pedestrian access (including footbridge) from the application site to the existing Gort Leamhan residential development. The proposed development also includes the completion of provision of on street public lighting on the public road at this location. The planning application is | Granted Permission on 16.03.2022 subject to 30 no conditions |

| | | | |
|-------|---------------------------|--|--|
| | | accompanied by a Natura Impact Statement. | |
| 21861 | Michael & Siobhan Kirrane | To construct dwelling house and private garage | Granted Permission on 23/12/2021 subject to 9 no conditions |

As can be seen from the above table above, Drumquin Construction Ltd, was granted permission for the development of 13 no dwelling houses at the site on the 16th of March 2022, subject to 30 no conditions (see figure 3 below for site layout). The development permitted is a high quality, low density development of detached dwellings on a landscaped site.



Figure 3: Site layout of residential development granted permission at the site in March 2022 (PI Ref 21/512)

The planners report for P21/512 referenced the following facts;

- Extent of the previous development works undertaken on this site.

- The requirement to avoid the creation of a derelict site
- The requirement to provide an adequate mix of housing
- To alleviate the pressure of “one-off Self Build” houses in the countryside
- To provide a mix of housing types to enhance employment opportunities and provide houses to a particular market segment
- The planning history of the site.

We also note that the existence of a grant of planning permission at a given site has been used to include other sites in the area such as the LDR8 for example, and we hope that the council will continue to adopt this approach in the case of the subject site. We submit that the draft plan should likewise support the facts laid down in the planners report for P21/512, and reinstate the current LDR zoning to the site.

4. PLANNING POLICY CONTEXT

This submission has been prepared with cognisance to the following planning policy documents.

- National Planning Framework: Project Ireland 2040
- Regional Spatial & Economic Strategy for the Southern Regional Assembly 2020- 2032
- Clare County Development Plan 2017-2023 & Draft Clare County Development Plan 2023-2029

4.1 National Planning Framework: Project Ireland 2040

In 2018, the Government of Ireland adopted the National Planning Framework (NPF) entitled Ireland 2040 to succeed the National Spatial Strategy. The NPF comprises the Government’s proposed long-term strategic planning framework to guide national, regional and local planning and investment decisions over the next 25 years. It is intended that the NPF will be a strategic document that will provide the framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy. The NPF has a number of National Policy Objectives (NPOs) that articulate delivering on a compact urban growth programme and are relevant to the proposed rezoning of the subject lands.

- NPO 1b relating to population growth in the region, with 340,000 to 380,000 additional people to 2040;
- NPO 3a deliver at least 40% of all new homes within the built-up footprint of existing settlements
- NPO 4 relating to attractive, well-designed liveable neighbourhoods; NPO 5 relating to sufficient scale and quality of urban development; and
- NPO 6 relating to increased residential population and employment in urban areas.
- NPO 33 prioritise provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location

There is a very significant population growth allocated to the Southern Region in which Ennis is identified as a Key Town – 340,000 to 380,000 to 2040. In order to facilitate this population growth there will be a requirement to develop large numbers of new houses and apartments in the region. Given Ennis is currently affected by the housing crisis, like most other big towns in the country, there is a considerable progress to be made in order to bring housing provision from its current under-supply to the level required to accommodate the population growth forecasts. However, it is important that more sustainable development patterns are established in order to facilitate targeted services and infrastructure investment.

It should also be noted that a report published by the National Investment Office – The Department of Public Expenditure and Reform ‘*Assessing the alignment of the National Planning Framework and National Development Plan*’ has carried out a high-level assessment of the population projections and housing needs as outlined in the NPF. The Rebuilding Ireland action plan set a target to reach a delivery of 25,000 homes per year in Ireland. With the impact of Covid-19 on these targets, a revised estimate for housing was developed in December 2020, which stated that the average housing supply will need to increase to an annual average of 33,000. This should also be reflected in the zoning of the land for the town of Ennis which suffered from a reduction in housing supply due to restrictions introduced during the covid-19 pandemic.

4.2 Regional Spatial and Economic Strategy (Southern Region) 2020-2032

The Regional Spatial & Economic Strategy for the Southern Region 2020-2032 (RSES) was adopted on 31st January 2020. The purpose of the RSES is to support the implementation of the National Planning Framework and the

economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region. Ennis has been identified as one of 6 large-scale Key Town in the RSES which are major centres for delivery of public services and are seen as;

Large population scale urban center functioning as self-sustaining regional drivers.

Given the considerable scope for growth in these large-scale Key Towns, it is envisaged that local authorities should plan for population growth of more than 30% by 2040, to be provided within the existing built-up footprint of the town. More specifically, Ennis has several strategic attributes, these being its scale, it being a county town, its significant zone of influence and its synergy with Limerick, Shannon and Galway.

Its status in the Southern Region makes it an attractive place to live and work in and the provision of sufficient housing in the town is a priority to accommodate the predicted population growth. Clare County Council should ensure that sufficient lands are zoned for housing developments and that provision is made to allow for a wide range of housing types to be built to cater for different housing needs.

4.3 Land Use Zoning

4.3.1 Current Zoning (Clare County Development Plan 2017-2023)

The lands are currently zoned LDR5 (*low density residential*) in the County Development plan 2017-2023 as illustrated below in Figure 4.

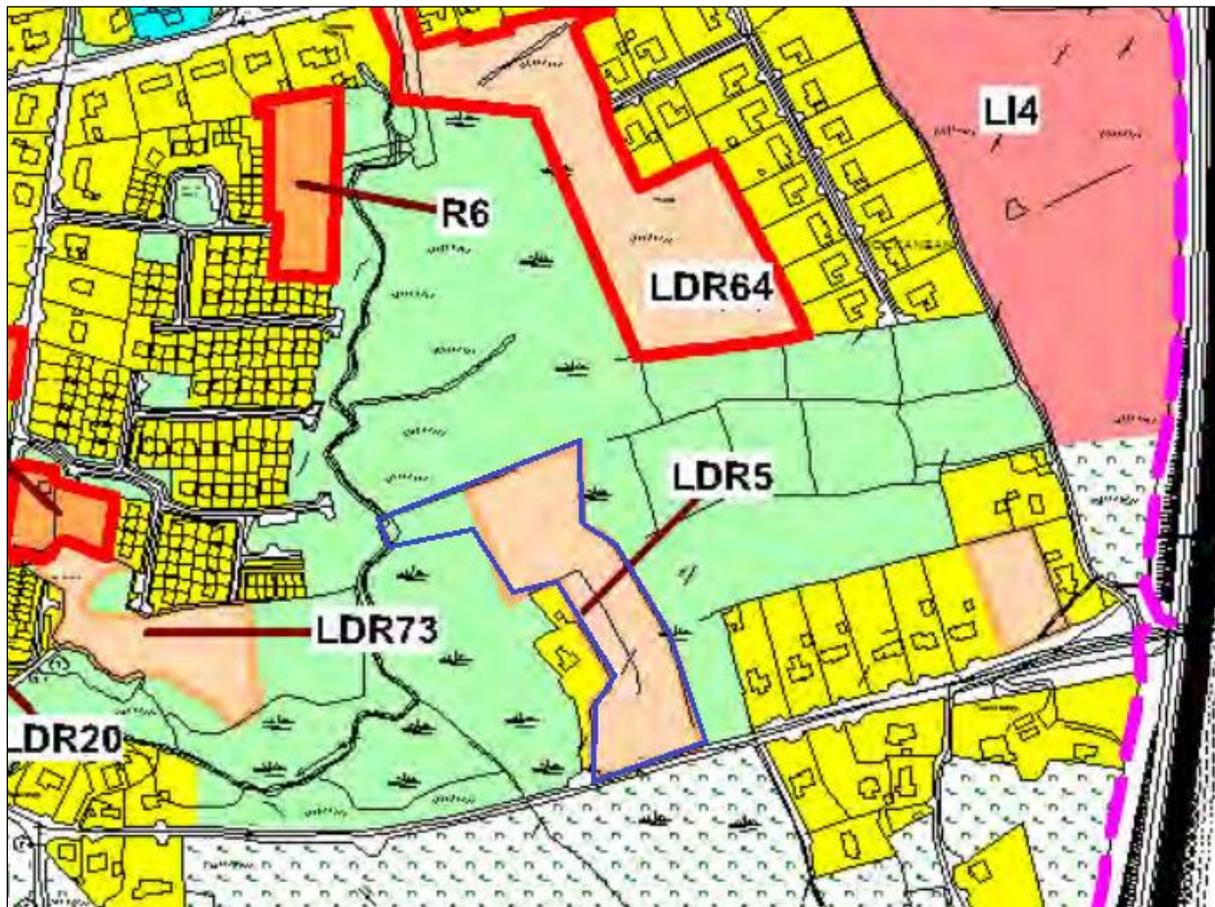


Figure 4 Current land use zoning LDR5 (site outlined in blue)

4.4 Draft Zoning (Draft Clare County Development Plan 2023-2029)

In the Draft Clare County Development Plan, it is proposed to zone the subject lands for open space, as illustrated below in figure 5.

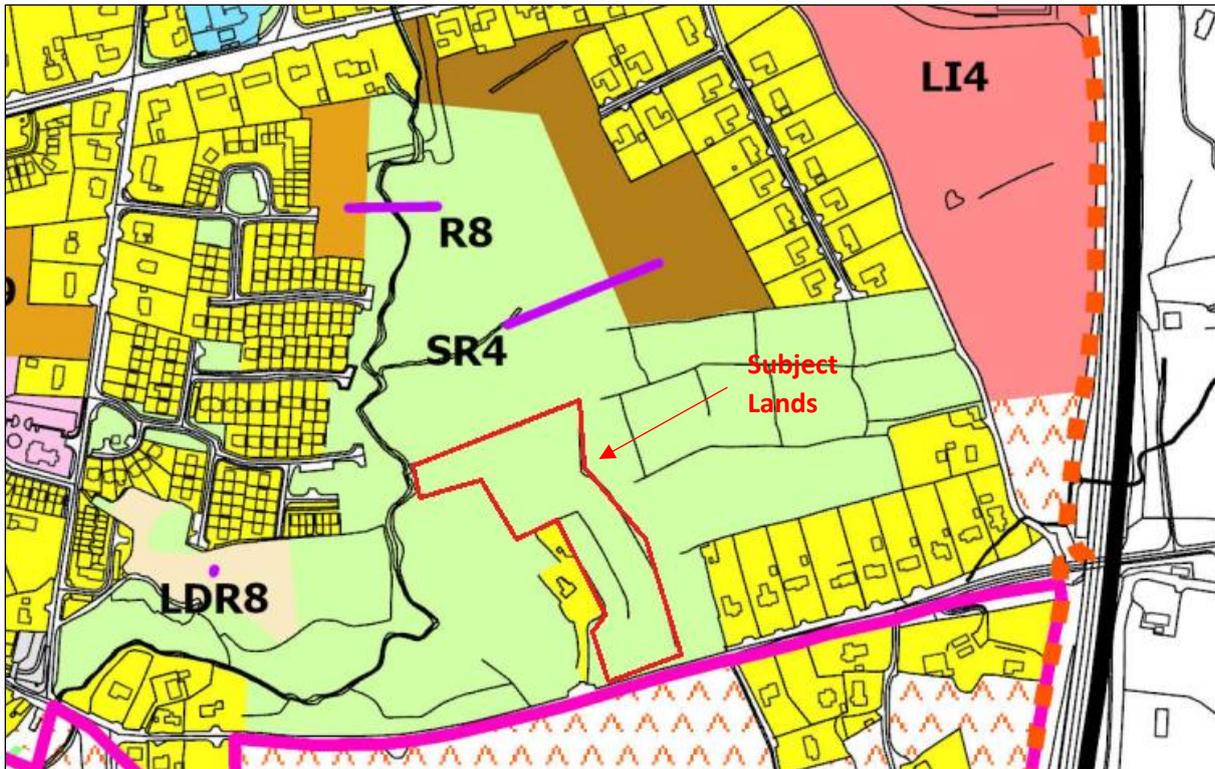


Figure 2 - Proposed land use zoning (site outlined in red)

4.5 Draft Clare County Development Plan 2023-2029

In Ennis, it is estimated that population growth in excess of 30% will occur up to 2040 and sufficient residential land has to be zoned to accommodate this growth. This equates to a population increase of 2,705 people who are to be accommodated in 1,550 no. new residential units. In addition, 30% of these new homes will have to be built within the existing built-up footprint. The Draft Clare County Development Plan has zoned land for residential development in Ennis town to ensure the planned and sequential development of lands in a manner that complies with national and regional objectives for compact growth. Lands have been zoned for development that comply with the following planning and land use criteria (as per Serviced Land Assessment in appendix 1 of Volume 3a)–

- > Compact Growth,
- > Public Transport
- > Co-ordinated development

Factors like Roads, Footpath, Water Supply, Waste Water were also taken into consideration. It is also highlighted in the draft plan that a “broad choice of housing options for the diverse needs of the towns’ population profile” is needed in the town.

The subject site has been zoned for open space in the draft plan, which is change from being zoned low density residential (LDR5) in the Clare County Development Plan 2017-2023.

4.6 **Clare County Development Plan 2017-2023**

As stated, the site is zoned for low density housing (LRD5) in the current County Development Plan. This is an appropriate zoning for the site given its location and existing pattern of development in the vicinity. The site is located within Roslevan neighbourhood which is recognised as an area suited to further residential development given its proximity to existing residential development, services and infrastructure. Section 2.3.1 of the Plan states;

lands have been zoned at Roslevan to accommodate the expansion of this neighbourhood in the future. A number of areas of land have been zoned in the Roslevan neighbourhood to accommodate residential growth. The proposed residential development lands are in close proximity to existing housing, shopping facilities, church and community centre which will assist in the consolidation and appropriate expansion of the neighbourhood.

There are also specific provisions relating to LRD5 in the plan;

The site is zoned for low density residential development, the design and layout of which must reflect the predominantly rural character of the area. Future development proposals must be connected to public wastewater treatment infrastructure. On-site treatment will not be acceptable to the Planning Authority.

A Construction Environmental Management Plan (CEMP) must be prepared as part of any planning application on this site detailing how surface water run-off, especially in relation to the release of silt and other pollutants, will be controlled during construction. Surface water run-off from development on this site must be treated via a combination of appropriate SUDS (i.e. green roofs, permeable paving, petrol interceptor, silt trap) prior to discharge to any surface water features including the Gaurus River.'

The provisions of this LRD5 zoning objective were complied with fully in the recent planning application at the site, hence the grant of permission for the development recently issued by Clare County Council. It is considered that the current development plan policy, associated zoning as well as the recent grant of planning permission clearly demonstrate that this is a suitable location for residential development.

5. ASSESSMENT OF SUBJECT SITE

The purpose of this section is to provide an assessment of the subject site against the criteria utilised by Planning Authorities in the identification of appropriate land for new residential development and as set out in Section 4 of the – *Development Plans: Guidelines for Planning Authorities 2007* published by the Department of Housing, Local Government and Heritage.

The key criteria from the Development Plan Guidelines 2007 will be set out below and an assessment of the proposed development provided against same. These criteria are as follows:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure & Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage Policy

In the interests of conciseness an abridged version of the narrative set out in the Guidelines. It is also noted that the Department of Housing, Local Government and Heritage published a draft of an updated Development Plan Guidelines in August 2021. It is considered that the subject site broadly meets the criteria set out in the draft document as they relate to the zoning of land for residential development.

5.1 Need

The Guidelines state the following in respect of need:

‘The amount of land to be zoned for any particular land-use must be clearly based on, and justified by, a realistic assessment of need. The survey and analysis stage of plan preparation should provide the baseline data to determine future land requirements. A number of factors need to be taken into consideration when determining the location and quantity of land to be zoned.’

5.1.1 Assessment

As outlined in Section 4.5 above and in the Core Strategy included in the Draft Clare County Development Plan there is an identified population growth of 2,705 people over the duration of the upcoming development plan (2023-2029) who are to be accommodated in 1,550 no. new residential units in Ennis. It is considered that there is an obvious and identifiable need for lands to be zoned for residential development at appropriate locations such as the subject lands and in particular lands that have planning permission. There is also a need for a variety of housing types in Ennis and the development recently permitted will result in the provision of high-quality low density detached dwellings in the town and will provide an attractive alternative to one-off rural housing.

5.2 Policy Context

The Guidelines state the following in respect of Policy Context:

‘Both the amount of land to be zoned for development and the proposed location of that land will also need to be influenced by other plans and strategies, from national and regional to local levels so that local authorities play their full part in supporting the implementation of those national and regional strategies.’

5.2.1 Assessment

Sections 4.1 and 4.2 above provide an overview of the national and regional planning policy context which are relevant to Ennis. These policy documents provide a very clear direction in relation to the requirement to accommodate very significant population growth within existing settlement in the coming years. The zoning of the subject lands and their beneficial development in terms of providing housing would accord with the relevant national and regional planning policy context.

5.3 Supporting Infrastructure & Facilities

The Guidelines state the following in respect of Supporting Infrastructure & Facilities:

‘Consideration must be given to the future availability of, or the capacity to provide, supporting infrastructure, such as community facilities, health-care, schools, public open space, retail and other service provision and public transport when allocating land for development.’

5.3.1 Assessment

The site is located within an area characterised by low density housing, within walking distance of several amenities and services in the town and in close proximity to the Roslevan neighbourhood centre. Connectivity to the neighbourhood centre will be improved by the inclusion of a pedestrian footpath between the recently permitted development at the site and the Gort Leamhan housing development to the north-west. The availability of service connections and the principle of same is also clearly established by the recent grant of planning permission on the subject site.

5.4 Physical Suitability

The Guidelines state the following in respect of Physical Suitability:

‘The development plan should strive to ensure that the form and location of new development offers the best “value for money” in terms of efficient use of existing infrastructure, while minimising the need for costly new infrastructure. Where land in green-field locations is to be zoned, account should be taken, in considering the different options available, of the land’s capacity for development by way of the most cost-effective means of providing the necessary infrastructure..... It is also vitally important to take account of the physical suitability of lands for development, notably lands subject to, or with potential impacts on, flood risks’

5.4.1 Assessment

There is existing infrastructure (water and sewer) serving the site. It is considered that the connection to existing infrastructure at this location would represent an efficient and cost-effective use of land. A flood risk assessment was carried out for the recently permitted development at the site. This permitted residential development satisfies the requirements of the flood risk management planning guidelines (2009) and represents a suitable land use for these lands and will not result in any impact on flood risk elsewhere. The development has suitable freeboard to accommodate uncertainty in respect of natural flooding and future climate changes and is therefore considered robust and sustainable in respect of flooding and flood management.

5.5 Sequential Approach

The Guidelines state the following in respect of the Sequential Approach:

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:

- (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. ‘leapfrogging’ to more remote areas should be avoided);*
- (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands;*
- (iii) Areas to be zoned should be contiguous to existing zoned development lands.*

5.5.1 Assessment

The subject site makes up a network of lands zoned for residential development in the Tulla Road/Knockanean neighbourhoods. The proximity of the site to the Roslevan Neighbourhood Centre and a variety of other amenities and community facilities mean that it is an appropriate location sequentially for new residential development.

5.6 Natural Heritage

The Guidelines state the following in respect of Natural Heritage:

‘Local authorities have a key role to play in regard to preserving the natural heritage of their areas arising from the legal responsibilities placed on them and from the increasing public awareness of the importance of nature conservation at local level. In doing so they should also avail of opportunities that may arise to create or promote new features of biodiversity in the context of new developments.’

5.6.1 Assessment

A NIS was submitted for the recently permitted residential development at the site which addressed issues in relation to potential impacts on Natura 2000 sites and other ecological sensitivities. The NIS addressed these issues and the Local Authority concluded that the development would not adversely affect the integrity of the nearby European sites. Conditions were attached to the permission in relation to mitigation measures set out in the NIS.

6. SUBMISSION

On behalf of our client, Drumquin Construction Limited, we wish to request that the area identified in Figure 6 below is zoned 'Low Density Residential' in the adopted Clare County Development Plan 2023-2029.



Figure 6: Subject lands outlined in red

6.1 Impact of Proposed Zoning

As the Planning Authority will be aware, planning permission was recently granted on the subject lands for 13 no. dwelling houses under Pl. Ref. No: 21/512. and this decision has re-established and reaffirmed the principle of a residential development on the subject site. In the event that the zoning proposed in the draft plan is adopted, it will make it very challenging to alter or amend the existing planning permission in any way as there will be no land use zoning which would underpin the principle of the proposed development. Our clients also fear that the lack of residential zoning on the site would be considered a significant risk to development finance for the granted scheme.

Furthermore, should our client wish to submit a revised residential development proposal to the Planning Authority in respect of these lands, the principle of the proposed development will likely be unacceptable given the absence of an appropriate land use zoning. Given that the Planning Authority has recently granted planning permission for the development of the lands, and that the principle of residential development has been deemed to be acceptable, it is considered that the proposed zoning of the subject lands for open space in the draft plan would be contrary to the principles of proper planning and sustainable development and we request that the current zoning as set out in the 2017-2023 Development plan along with the site specific zoning objectives are retained in the proposed CDP 2023-2029.

7. CONCLUSION

In summary, the main considerations for the proposed retention of the current LDR residential zoning of the site are as follows:

- > The subject site is located within the settlement boundary of Ennis
- > The site is located in close proximity to the Roslevan neighbourhood centre and Ennis town centre,
- > The site has positive planning history, the most recent permission being granted at the site for 13 no dwelling houses (PL Ref 21/512) as recently as 16th March 2022.
- > The site benefits from **previously developed on-site services** i.e. water and sewer,
- > Road infrastructure and vehicular access are satisfactory at the site, as was established in the recent planning permission on the site.
- > As part of the recent grant of permission at the site, it is proposed to provide an important piece of pedestrian and cycle infrastructure connecting the development to the Gort Leamhan estate at the northwest of the site. This will improve further the connectivity of the site with the local Neighbourhood Centre and local amenities and facilities. This permitted infrastructure adds a wider planning gain to the neighbourhood and local Knockanean school and be used by wider population.
- > The permitted development will promote sustainable transport modes (walking to school, cycling etc) in a safe manner.
- > As set out above and within the Council's planners report under P21/512 there is a requirement not to create a derelict site and provide an adequate mix of housing in particular that can support employment opportunities,
- > The owners have had attempted illegal parking/ encampments on this site and would not want same to reoccur nor do they wish to see that site be left as a vacant site,
- > The design and layout of the development permitted at the site is high quality detached dwellings, in keeping with the characteristics of surrounding development,
- > The provision of low density, high quality detached dwellings at this location will add to the housing choice available in the town and will provide an attractive alternative to one-off housing in the countryside,
- > The zoning of this land complies with the Development Plan Guidelines 2007 and the Draft Development Plan Guidelines 2021.
- > The Core Strategy set out in the Draft Clare County Development Plan identifies a very significant requirement for new homes in Ennis over the lifetime of the Development Plan, this demand has been exacerbated by the Covid-19 pandemic.
- > The recent developments in Ukraine have resulted in increased pressure on accommodation in Ennis and Clare. Over 1500 persons have located in Clare so far and predictions of up to 8,000 are possible, many will locate to Ennis and no provision has been made for such a rapid and unexpected population spike in the draft plan.

We trust that the above submission will be given due consideration in the preparation of the Clare County Development Plan 2023-2029.



