
Planning Department
Clare County Council
New Road
Ennis
Co. Clare
V95 DXP2
By email: devplan@clarecoco.ie

22nd December 2022

**Re: Proposed Amendments to the Draft Clare
County Development Plan 2023-2029**

On Behalf Of: Protogenia Ltd

Dear Sir / Madam,

I write in relation to the Proposed Material Amendments to the Draft Clare County Development Plan 2023-2029 and wish to make a submission in that context. This follows the submission made on our behalf by KPMG Future Analytics (ref: S2/876) to the Draft County Development Plan which requested the rezoning of the subject lands to '**Residential**' to support the sustainable delivery of future residential development on underutilised serviced lands. The demographic profile of the area that was undertaken to provide an evidential based analysis to support and guide the submission confirmed that the current need for housing in Ennis will be exacerbated by projected population growth over the Plan period.

The submission further demonstrated that, from a sequential development perspective, the subject lands are better positioned to come forward for development in the short to medium term due to their contained and coherent nature in single entity ownership. These lands represent an opportunity to rationalise and complete and existing residential community to the north of the town and offers an immediate solution to housing demand in the area and thus contribute to achieving the planned housing targets for the settlement.

Introduction / Site Context

As outlined in my previous submission to the Draft CDP, and as indicated in Figure 1.1 below, the subject lands (approximately 10ha) are strategically located to the north of Ennis town centre. The site further benefits from its contained and coherent landholding owned by a single-party who is eager and committed to securing the residential redevelopment of the lands over the lifetime of the Draft Plan. It should also be reiterated that the site's single party ownership offers a degree of certainty in terms of development intent for the lands and presents a viable opportunity to deliver an integrated plan led development response to currently underutilised lands.



Figure 1.1: Indicative extent of subject lands

Proposed Material Amendment

It is regrettable that the Chief Executive, in their report on the submissions made to the Draft Plan, recommended that no amendment be made to the Draft Plan, citing their belief that a sufficient quantum of land has been zoned within Ennis to accommodate the required amount of housing units to meet the needs of allocated population growth for the area. However, it is our respectful submission that such targets are conservative and do not account for inward migration resulting from the ongoing war in Ukraine. As such, it remains our position that the subject lands which are development ready should not be prejudiced from delivering much needed housing during the Plan period as a direct response to this growth.

Notwithstanding the above, we do welcome the intention of the Authority to permit residential development on the northern portion of the lands through the inclusion of the **LDR14** objective as outlined in Figure 1.3 below.

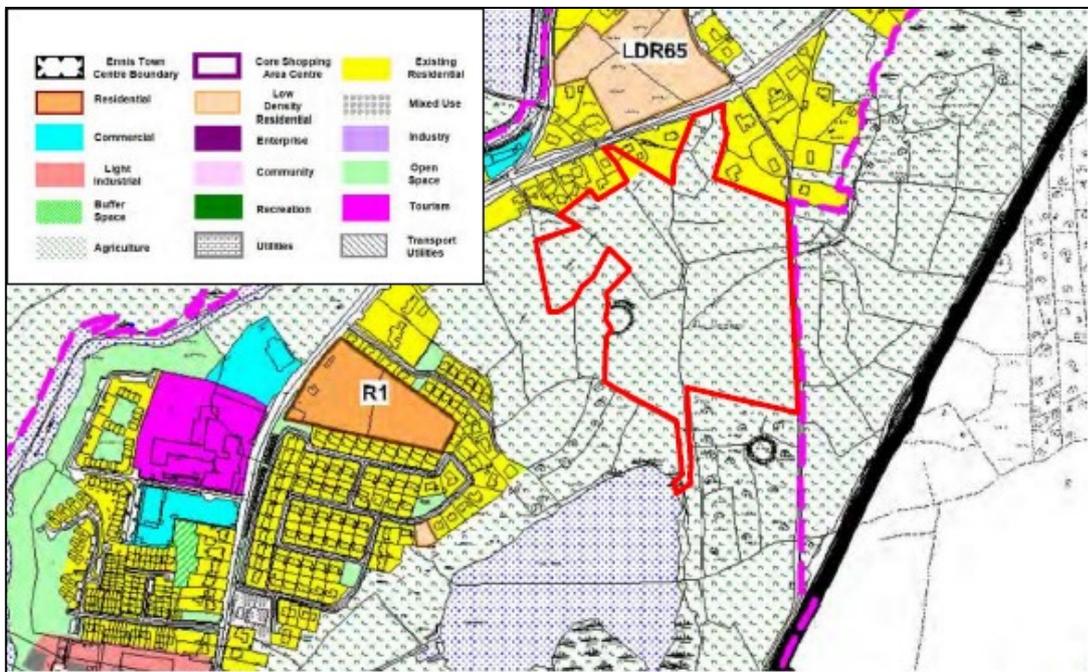


Figure 1.2 Zoning Proposed by the Draft Clare County Development Plan 2023-2029

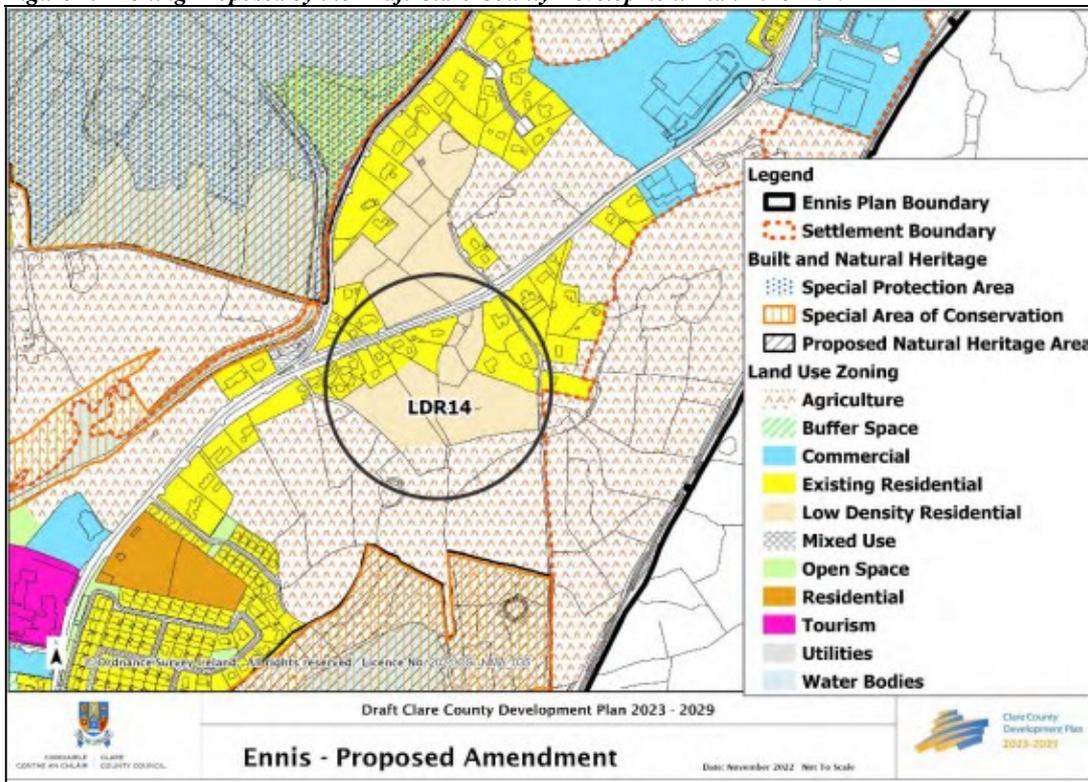


Figure 1.2 Proposed Amendment to the Draft Clare County Development Plan 2023-2029

This proposed Material Amendment clearly acknowledges the suitability of these lands for residential development and will provide an opportunity to consolidate an established residential community east and west of the lands.

However, we respectfully submit that the proposed Material Amendments represent a missed opportunity in realising the potential of the subject lands to accommodate residential development in the short to medium term and ensure the strategic vision for the growth of Ennis can be delivered upon. Furthermore, the highly accessible nature of the subject lands will be further enhanced through the planned Northern Inner Relief Road linking Gort Road (R458) to Tulla Road (R351). This will improve permeability through the town and strengthen the connectivity of these lands.

Infrastructural investment in the area including the construction of an overflow pipe from Lough Girroga to the River Fergus has enabled development opportunities for lands abutting the lake. In order to maximise a return on this investment the ability of the southern portion of these lands to now accommodate development should be recognised and encouraged by permitting in principle residential development on the entire land bank.

As outlined in our previous submission, of the c.90ha of land that has been identified for residential development since the adoption of the current Plan, a total of 49.7ha shows no visible signs of development activity nor do these lands benefit from extant planning permissions. If this level of inactivity is allowed to continue, there will not be sufficient zoned lands to accommodate the projected population growth for the Ennis settlement and the Plan will fail to deliver its housing targets and vision for the continued expansion of Ennis.

We wish to reaffirm our commitment to developing these lands and provide high quality housing should we be permitted to do so. We continue to articulate that a viable opportunity exists to transform these lands from the current underutilised state and provide a vibrant new residential led development that will complement and enhance the existing offering in the settlement core.

I welcome the opportunity to continue engaging with Clare County Council in realising the full potential of these lands.

Yours sincerely,

