

**Annette Ryan**

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**From:** Martin Molloy <mmolloy@mkoireland.ie>  
**Sent:** Tuesday 3 January 2023 09:26  
**To:** Development Plan  
**Cc:** Aine Bourke  
**Subject:** Proposed Amendments to the Draft Clare Draft Development Plan 2023-2029  
**Attachments:** MA Sub\_Drumbiggle Lands\_ F\_201165-c\_23.01.03.pdf

Dear Sir/Madam

Please find attached submission to the Proposed Amendments to the Draft Clare Draft Development Plan 2023-2029, on behalf of our clients White Cedar Developments Limited.

We would be most grateful if you would confirm receipt of this submission at your earliest convenience.

Kind regards,  
Martin

**Martin Molloy**  
Planner

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**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 735 611



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Planning Department,  
Clare County Council,  
New Rd,  
Cappahard,  
Ennis,  
Co. Clare,  
V95 DXP2

**Our Ref:** 201165-C  
**Your Ref:** Site R23

3<sup>rd</sup> January 2023

**Re: Submission on the Draft Clare County Development Material Alterations Phase, for lands at Drumbiggle Road, Ennis, Co Clare**

Dear Sir/Madam,

On behalf of our client, White Cedar Developments Limited, we wish to make a submission regarding the Stage 3 (Material Alterations) of the Clare County Development Plan 2023-2029 (hereinafter referred to as the Draft Plan) which was published on 28<sup>th</sup> November 2022 and on public display until 3<sup>rd</sup> January 2023.

The purpose of this submission is to respond to the Material Alterations made in respect of our client's lands on a site in Drumbiggle, Cahercalla, Ennis which is currently zoned for Residential Development in the extant Clare County Development Plan 2017-2023, and has been subject to alterations to both Residential and Strategic Residential Reserve zonings in this emerging Draft Plan.

This submission largely relates to these zoning alterations outlined under reference R23 in the Material Alterations Development Plan Document, which, we consider reference SR8 to be a part of also, as they comprise one site, as a whole.

In the first instance, we would like to take the opportunity to welcome the alterations to this zoning, which have been proposed thus far by Clare County Council to amend the proposed zoning of the overall site, in part, reinstating the Residential zoning on the southern element.

### **Site Location**

The subject site is located to the west and north of the Páirc na Coille Retirement Village complex, west of the County Clare Agricultural Show Society Showgrounds, east of residential development at Willsgrove and Cahercalla Drive. Access to the site is via an existing access off Showgrounds/Drumbiggle Road which serves the entire subject site along with the showgrounds/the Ennis Rugby Football Club, the Ennis Nursing Home and the Páirc na Coille Retirement Village. The location of the subject site is illustrated on **Figure 1** below.



MKO, Tuam Road, Galway, Ireland. H91 VW84

+ 353 (0)91 735611 | [info@mkoireland.ie](mailto:info@mkoireland.ie) | [www.mkoireland.ie](http://www.mkoireland.ie) | [@mkoireland](https://twitter.com/mkoireland)

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Figure 1: Subject Site, Source: MyPlan.ie

The locality is largely comprised of residential development including single dwellings on Showgrounds/Drumbiggle Road to the north, the Woodlands residential development to the south, and the Willsgrove and Cahercalla Drive residential developments to the west. To the east of the site are the Showgrounds, the Ennis Nursing Home and the Páirc na Coille Retirement Village complex.

The site is currently undeveloped and zoned for residential development in the extant Clare County Development Plan 2017-2023. Having previously been cleared and subject to earlier works, it currently consists of overgrown scrubland with some mature trees on the southwest boundary. The boundaries include rendered block wall (southwest) and wire fence (northeast). To the southeast the boundary is formed by the rear gardens of residential units on the Woodlands residential development.

There are no protected structures or archaeological monuments located within or in the vicinity of the subject site. The nearest recorded monument to the subject site is Record No. CL033-171 which comprises a Ringfort-rath located approximately 480 metres west of the subject site.

The site is not located within or immediately adjacent to any EU or nationally designated site.

The southern portion of the subject lands are subject to a live planning application which was granted permission by Clare County Council (Ref: 21/599) and is currently subject to third-party planning appeals which are being considered by An Bord Pleanála (ref: ABP-313217-22).

It is the intention to bring the northern element of the subject site forward for development in the near future.



## Material Alterations

The purpose of this submission is to comment on the material alterations proposed, particularly in respect of Material Alteration Reference ‘*Site R23*’.

In the first instance, we would like to take the opportunity to welcome the alterations to this zoning, which have been proposed thus far by Clare County Council to amend the proposed zoning of the overall site, in part, reinstating the Residential zoning on the southern element. However, we would kindly request that the text relating to this zoning be partially amended, to ensure a viable and appropriately scaled development site can be brought forward on this site.

The current proposed wording of this material alteration is set out, and illustrated on **Figure 2**, below:

### *“Site R23 Adjacent to Pairc na Coile Nursing Home*

*This site has been identified for residential development. The area of the site to the west of Pairc na Coile includes an attractive natural habitat which should be retained, at least in part, as open space between any new development and the existing nursing home, providing an open space buffer between the two developments. This site is located less than 1km from a known bat roost. Proposals for development on this site must be informed by an ecological assessment of the site and appropriate bat surveys and shall ensure that there is no loss of habitats used by Lesser Horseshoe Bats. Any habitat loss must be offset by additional landscape planting to ensure connectivity across the landscape. All design proposals, including lighting, must be informed by the results of the bat survey. A landscape management plan must also accompany any development proposals. Development proposals shall include mitigation for bats, water quality and Special Conservation Interest Birds, as set out in Volume 10a Natura Impact Report as it relates to R23. (NIR mitigation 2,3 and 4a)”.*

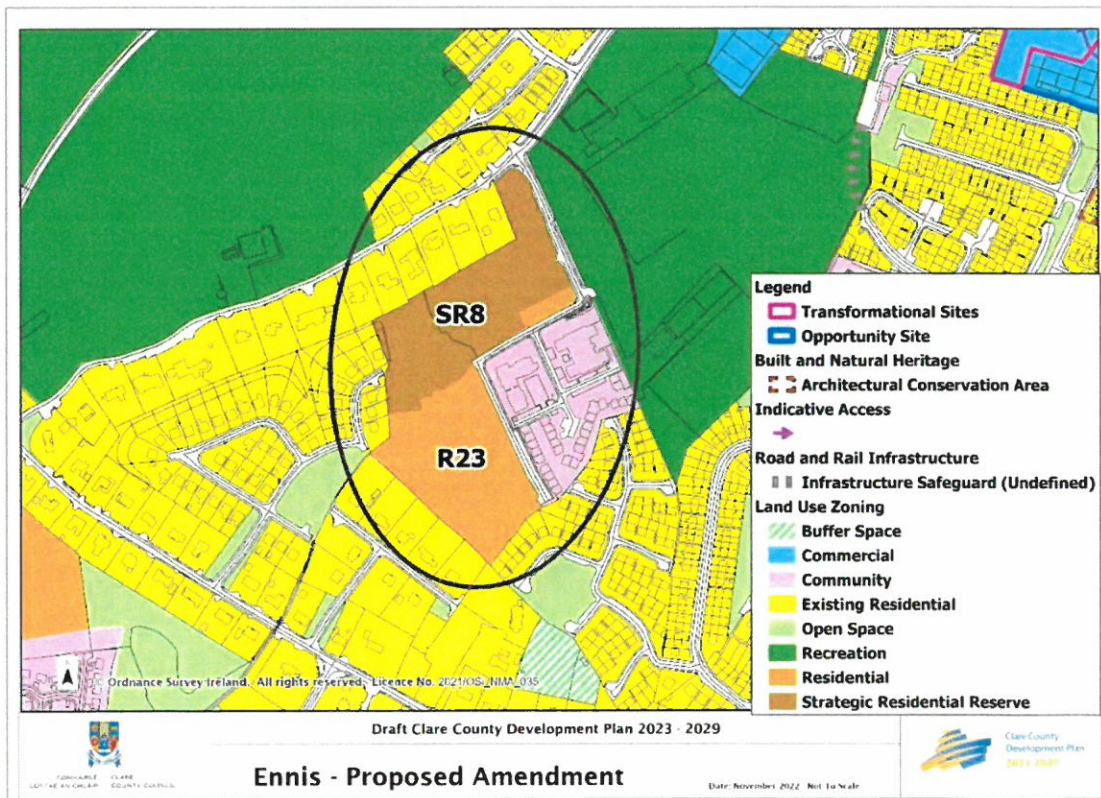


Figure 2: Site Zoning Map, Source: Material Alterations of the Draft Clare County Development Plan 2023-2029



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In relation to the above wording, it is respectfully requested that it be amended to remove the reference to the inclusion of open space between the nursing home and the development site, to ensure that a viable development can come forward at an appropriate scale and in accordance with density standards where possible. It is noted that there are existing constraints to this site, with part of the site required to be proposed as an ecological/commuting corridor, to allow the commuting bats safe passage through the site. As noted below on **Figure 3**, the proposed application, which was granted by Clare County Council (Pl. Ref: 21/599) reserved lands along the western boundary for this. Should Open Space requirements be prescriptive in their location throughout the rest of the site, there is a concern that there will be limited flexibility within the remaining site to provide an appropriate high-quality and well laid out development which is at an appropriate scale and density for the area.

As an alternative to the above, we would respectfully request it is specified that this open space requirement only relates to the lands adjacent to the nursing home and does not relate to the Pairc na Coille Retirement Village.

The purpose of this requested amendment is to ensure that a large Open Space buffer is not required along the entire eastern boundary of the subject site, which would result in the significant limiting of the development potential of the site. As can be noted in the granted site layout plan (Ref: 21/599) which is currently at appeal and under consideration by An Bord Pleanála (ref: ABP-313217-22), and Open Space buffer was not required, and subsequently considered acceptable as propose, by Clare County Council.



Figure 3: Site Layout Plan granted under pl. ref. 21/599 (Source: Arnold Leahy Architects)



In addition to the above, we further respectfully request that Clare County Council realign the boundary of this 'Site R23' material alteration to include the parcel of land to the north, which is considered to be part of the same subject site and will be subject to a planning application imminently.

It is respectfully put to the local planning authority that the entire subject site should be zoned Residential, in the interests of proper planning and sustainable development, and based on the following:

- The subject site is currently zoned for residential development as a whole, in the extant County Development Plan, and is located within a key location in the built-up area of Ennis, which is identified as a key town.
- The portion of the subject site which has been proposed to be rezoned as Strategic Residential Reserve (SR8) extends to an area of 2.45 hectares and has the capacity to assist Clare County Council in meeting the housing requirements for Ennis as outlined in the Core Strategy.
- The location of the lands to the front of the overall site, adjoining the Showgrounds/Drumbiggle Road, would result in sequential development of the area, in accordance with national planning policy and good planning practice.
- Residential development on these lands would constitute infill development and would be in keeping with the compact growth agenda within policy at all levels.

Residential development on this overall subject site would assist with meeting, and be in accordance with, both National and Regional Planning Policy objectives and population growth targets. It is, therefore, the request of this submission that Clare County Council continue to recognise the potential of these lands and the opportunity for growth in Ennis that could be provided through the continued zoning of the overall parcel of land.

The need for new housing in Ennis is recognised as being imperative to the future growth of Clare. As set out in the core strategy, the population targets in the Ennis within the town boundary are targeted to increase by 2,705 up to 2026, for which housing within the town area must be provided. Ultimately, it is considered that Development Plans must tackle housing need head on, and ensure sufficient lands are zoned to deliver on increased housing targets. It is considered that the lands subject to rezoning and site-specific objective included within Material Alteration no. R 23 will provide an opportunity to assist in reaching the targeted population growth for County Clare over the emerging plan period, in a sustainable location. As outlined above, the alteration of the southern element of the lands to remain as a Residential zoning is welcomed by our client, however, we respectfully request that the lands to the north are included in this R23 boundary, comprising one site which has the potential to provide residential development in a sequential manner overall.

## Conclusion

This submission has been prepared regarding the Draft Clare County Development Plan 2023-2029, Material Alterations Stage, on behalf of our clients, White Cedar Developments Limited.

The purpose of this submission is to welcome the material alteration relating to 'Site R23' in the first instance, to present a case for the minor alterations to the related text and respectfully request the boundary of this R23 zoning is amended to include the remainder of the site to the north, in accordance with the provisions of proper planning and the sequential development of Ennis.

We trust that this submission will be considered as supportive for this suggested Material Alteration and the zoning of the overall site at Drumbiggle for residential development, to be included in the



emerging Clare County Development Plan 2023-2029 and look forward to working with Clare County Council in the future in relation to the sustainable development of these lands.

Yours sincerely,



Áine Bourke *BA(Hons) MPlan MRTPI MIPI*

Project Planner

