

Submission to Proposed Amendments to Draft Clare County Development Plan 2023-2029

Lands at Cahircalla More/Beechpark, Ennis

Submission Ref: S2.824

Killaloe Diocesan Trust

Issue: A

Customer Project Number: 2856

Customer Document Number:



Document Sign Off

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Killaloe Diocesan Trust
Issue A

File No: 2856

CURRENT ISSUE					
Issue No: A	Date: 31.12.2022	Reason for issue: Submission Proposed Amendments to Draft Clare County Development Plan 2023-2029			
Sign Off	Originator	Checker	Reviewer	Approver	Customer Approval (if required)
Print Name	Mandy Coleman	Paddy Coleman		Mandy Coleman	
Signature	Authorised Electronically				
Date	31.12.22	31.12.22		31.12.22	

PREVIOUS ISSUES							
Issue No	Date	Originator	Checker	Reviewer	Approver	Customer	Reason for issue

1.0 INTRODUCTION

P. Coleman & Associates, Architects, Engineers and Planning Consultants, 5 Bank Place, Ennis, Co. Clare, make this submission on behalf of Killaloe Diocesan Trust (our Client), in respect of lands at Cahircalla More/Beechpark, Ennis (subject land). The subject land is within the Ennis Municipal District Settlement Plan - Volume 3a of the Draft Clare County Development Plan 2023-2029

Our Client lodged a submission to the Draft Clare County Development Plan 2023-2029 (the Draft Plan) Submission Ref: S2.824 and welcomes the zoning objective proposed on the subject land as outlined in the Draft Plan.

2.0 PROPOSED AMENDMENTS TO THE DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029

2.1 Zoning to be Accepted - Ennis Municipal District Settlement Plan - Volume 3a

Our Client wishes to accept the proposed 'Enterprise' and specific zoning objective of 'ENT5' on the subject land which also includes for a revision to the Ennis Plan Boundary as outlined in Figure 1 below and requests that these proposals be adopted in the final Clare County Development Plan 2023-2029.

Please note that a portion of land within the proposed 'ENT5' block is not within our Client's ownership. See area marked 'X' and outlined in red in Figure 1 below. This submission does not relate to this portion of the 'ENT5' site as it lies outside our Client's ownership.

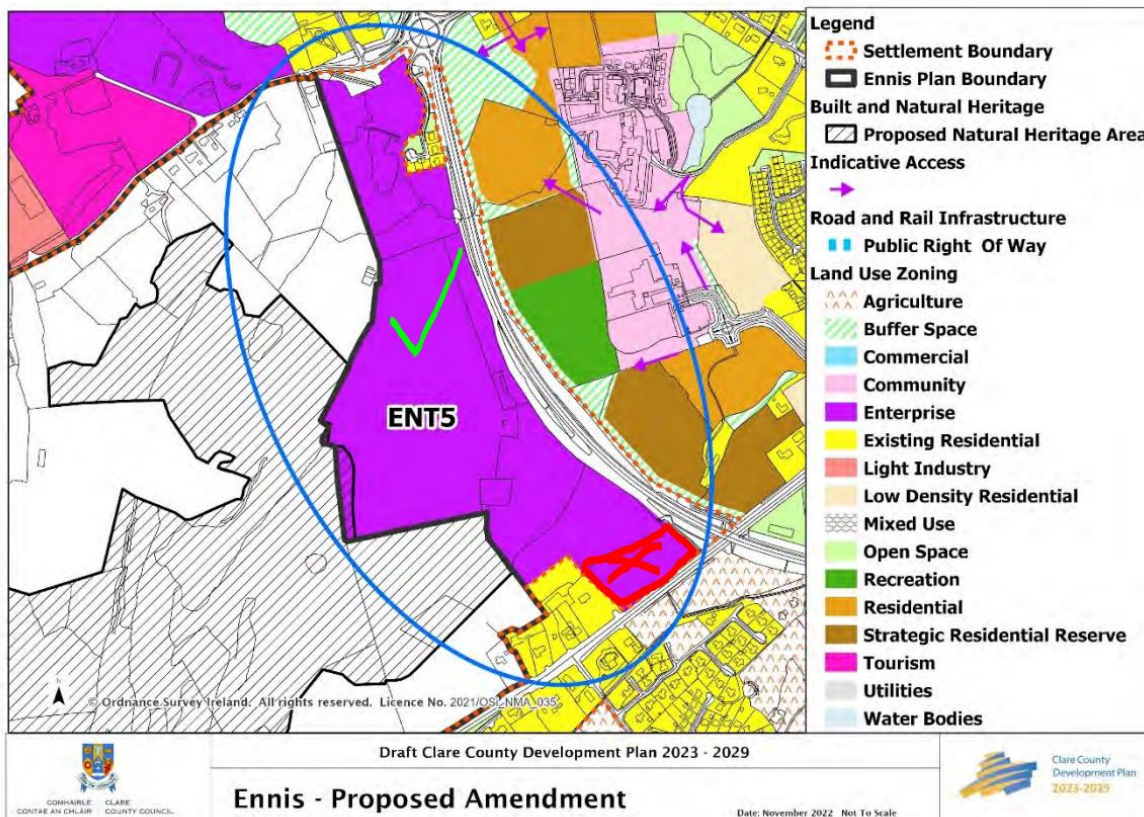


Figure 1 – Beechpark Lands with Zoning requested to be accepted identified



2.2 Section 1.5.2 of Ennis Municipal District Settlement Plan - Volume 3a

Our Client welcomes the proposed change in text to Section 1.5.2 of the proposed Ennis Municipal District Settlement Plan which forms Volume 3a of the Proposed Amendments to the Draft Plan as shown in Figure 2 below. This text change now includes for the zoning of the 'ENT5' lands. Our Client is seeking to have the change in this text accepted and adopted in the final Clare County Development Plan 2023-2029.

In the **Beechpark Area** on the western side of Ennis, ~~an~~ there are two undeveloped sites ~~has been~~ zoned for Enterprise development (**ENT1**) & (**ENT5**). These sites ~~is~~ are strategically located to the west of the junction of the N85 with the R474 and ~~has~~es potential to accommodate a low-carbon, campus-style Enterprise Park close to the national road network and Ennis Town. **ENT5** is appropriate for such uses as Advanced Manufacturing, such as an Advanced Technological Park. Any future proposals on this site shall be of a high-quality design.

Figure 2 – Change in Text in Section 1.5.2 of Ennis Municipal District Settlement Plan - Volume 3a of the Proposed Amendments to the Draft Plan.

3.0 SUPPORT FOR PROPOSED AMENDMENTS

We refer to the assessment of the subject land as outlined Proposed Amendment No. 9 (Submission No. S2/824) of the Addendum to Environmental Assessments and Report – Volume 10a & b of the Proposed Amendments to the Draft Plan. This Assessment expressed three concerns regarding the proposal to have the subject land zoned as 'Enterprise' which we wish to address below.

(a) Extension of Ennis Plan Boundary

The Environmental Assessment expressed concerns regarding the proposed extension to the Ennis Plan Boundary stating that *"The Ennis plan boundary is long established through a number of iterations of plans, and is proportionate in scale, to support the compact sustainable development of Ennis, and should not be altered at this time without strategic reasons to do so"*

Ennis Plan boundary is required to be extended to incorporate the subject land but no extension of the Settlement Boundary is required. We note that the Ennis Plan boundary was previously extended to provide for the 'ENT3' (Data Centre) site at Toureen and 'COM7' site (Motorway Service Station) Kilbreckan.



Our Client submits that the development of the subject land is suitable for a Low Carbon Advanced Manufacturing Enterprise Zone which can provide for business support workshops, networking activities, open plan offices, incubation, and hatchery space (R&D). It is imperative that an adequate amount of Enterprise lands are zoned which can be developed within the Ennis Municipal District area within the Plan period to facilitate the creation of new sustainable employment and enterprise development and stimulate inward investment. Ennis is designated a 'Key Town' in the Regional Spatial and Economic Strategy for the Southern Region' (RSES). The RESE identifies Ennis for significant population growth of greater than 30% above 2016 population levels by 2040.

The proposed 'Enterprise' zoning on the subject land complies with both National and Regional Strategic Planning Policy objectives confirmed in recent years, primarily given the strategic location of the lands which can comprise new employment generating land adjacent to the existing built-up footprint of the urban area of Ennis.

In line with planning policy, the provision of 'Enterprise' zoning on the subject land constitutes the orderly and efficient extension of the urban area.

The development of this site for 'Enterprise' use can therefore be regarded as strategic development which would allow for the extension of the Ennis Plan Boundary.

(b) Quantum of Enterprise Lands zoned in Beechpark Area.

The second concern expressed in the Environmental Assessment on this proposed rezoning relates to the extent of lands zoned for 'Enterprise' in this area given the 'ENT1' land zoned on the opposite side of the R474 from the subject land at Beechpark.

In our Clients opinion the subject land is sequentially preferable over the 'ENT1' land at Beechpark for the following reasons:-

- 'ENT1' land is located on the edge of town on a greenfield elevated site with long range views to and from the site.
- Access to the 'ENT1' land is via a narrow busy regional road with no public footpath or public lighting. Our Client's land is strategically located with immediate access to the N85 and a wide range of facilities including educational, recreational, existing and proposed new housing developments. Public Footpath serving the lands to the Town Centre.
- An extension of public infrastructure is required to service the 'ENT1' land. Our Client's land can be fully serviced with public sewer, public water supply, ESB, gas, public lighting with a public footpath serving the land to the town centre.
- There are two national monuments on the 'ENT1' land which would require a significant buffer area which would limit the extent of the land to be developed. Our Client's land has no special designations or environmental sensitivities and provide great potential for future development.
- Given the existing use of the 'ENT1' lands as agriculture and with an operational abattoir, the availability of lands for development within the plan period is therefore uncertain.



- Despite the 'ENT1' lands being zoned for 'Enterprise' use since 2017 there is no planning history and no record of any development proposal on these lands for any development purposes.
- Our Client's land is readily available which means it can be developed within the period of the plan.

(c) Biodiversity

The third concern expressed in the Environmental Assessment on this proposed rezoning relates to the possible impact to biodiversity from developing the subject land. Our Client is proposing that the 'ENT5' land have a specific zoning objective which would include the following:-

Any development application on the 'ENT5' land shall be accompanied by a full bat survey by a suitable qualified ecologist, particularly in relation to Lesser horseshoe bats usage of the site and a full light spill modelling study to demonstrate that the chosen lighting design shall not create any increase in ambient light levels beyond the perimeter of the development footprint. Development applications shall not propose removal of woody vegetation around the perimeter of the site and shall address how linkages across the landscape can be maintained and enhanced. Existing hedgerows within and bounding the site should be protected and integrated into any proposed development, providing an appropriate buffer to protect their value as a potential foraging and wildlife commuting corridor including for Lesser Horseshoe bats, given its proximity to Newhall and Edenvale complex SAC.

Development applications shall be accompanied by an Ecological Impact Assessment and Appropriate Assessment Screening Report and/or Natura Impact Statement.

A requirement to provide the above assessments as part of any future development proposals on the subject land will ensure that there is no adverse impact to biodiversity from any approved development of the lands.

4.0 CONCLUSION

This submission requests that the proposal as outlined in the Proposed Amendments to the Draft Plan where it is proposed to amend the Ennis Plan Boundary to include the subject land and for the subject land to be zoned as 'Enterprise' be adopted in the final Clare County Development Plan 2023-2029.