

For the Attention of the Board.

ABP 306088: - Residential Development, Ennis, Co. Clare.

I refer to the submissions lodged with the Board in response to the Section 131 Notification and to the Board Direction dated, 20th October 2020.

I note the public and newspaper notices copies of which were submitted to the Board on 7th August, 2020.

I note the following submissions:

Submission from the applicant's agent dated, 19th June, 2020.

A revised scheme for ninety-eight dwellings is proposed comprising, 50 houses and 48 apartments along with a creche facility. A reduced "development area" of 3.22 hectares is indicated and the density is calculated at 30.4 units per hectare. It is submitted, is consistent with section 6.11 of *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (DOEHLG 2009) in which it is recommended that densities of 30-50 units should be encouraged in Outer Suburban/Greenfield sites) and, that net densities of less than thirty units per hectare should be discouraged.

The ninety-eight dwellings which comprises one, two, three and four bed units consist of:-

- 32 two bed appts
- 8 two bed appts in duplexes
- 8 one bed appts in duplexes
- 24 semi-detached three bed houses
- 2 semi-detached four bed houses
- 2 detached four bed houses
- 10 semi-detached two bed houses
- 12 terraced two bed houses

The majority of the dwellings overlook a central open space and courtyard clusters with own door apartments with private and communal open space are included. The roads layout provides for alignment with the development on the adjoining lands to the south at which there are two access points and the design and widths, (at five and 5.5 metres) which it is stated, provide for traffic calming and restrict attainable speeds as provided for in DMURS. Pedestrian and cyclist routes and linkages include access to the buffer zone adjoining the N85, to the development to the south and to the central open space. According to the submission, potential for connectivity the north is limited as golf courses in private ownership adjoin the site. Landscaping incorporating extensive tree planting is provided throughout the scheme including the outdoor play area for the creche.

Submission of the Planning Authority dated, 20th August, 2020

It is stated in the submission that:

- The higher density preferred for the site by the Board is more appropriate to centrally located site locations instead of the periphery (of Ennis) as is the case with the subject site location for which the zoning provides for Lower Density Residential Development.
The higher density is at variance with those provided for in the Core Strategy adopted by Members of Clare County Council.
- The higher density is at variance with the density of the permitted scheme on the adjoining lands to the south under P. A. Reg. Ref. 17/237.

With regard to the revised scheme, there are concerns regarding:-

- Adverse impact on visual amenities of the area
- Visual dominance of roads and parking in the layout. At Nos 46-74 and 75-86
- Connectivity between the central open space and the dwellings at the north and west boundaries, the remainder of the lands and the adjoining development to the south.
- Parking spaces at a remove from dwelling units.
- Overlooking from the apartment units Nos 1-8,

- Lack of auto track analysis to demonstrate adequacy of design of roads, junctions and parking areas.
- Provision for bat commuting corridors.

Submissions of Mr. John Madden dated, 16th June 2020 and 31st August, 2020.

Mr Madden considers that the revised proposal does not provide for a change in density that dominance of roads in the layout and the landscaping are unaltered and that there is little provision for cycling and pedestrian connectivity. He considers that the development is likely to be predominated by social housing lacking in services and facilities.

Mr. Madden reiterates the concerns he raised in connection with the original application and appeal regarding surface water and foul water drainage arrangements and, sightlines at the proposed entrance.

Comments and Recommendations

The revised layout shows the dwelling units concentrated in within the area at the southern end of the site and overall masterplan area for the two phase development and at a higher density, (for which a total number of 296 units is indicated) than the adjoining development permitted under P. A. Reg. Ref. 17/247.

As pointed out in the submission of the planning authority the revised proposal is at variance with the adopted core strategy and the lower density residential zoning objective for the subject lands within the adopted CDP which are located at the outer edge of the settlement.

The dwelling mix and layout having regard to provision for sense of place and permeability with regard to cyclist and pedestrian connectivity and landscaping generally accords with the standards and recommendations within the statutory section 28 guidance: *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* and Design Manual for Urban Roads and Streets (DMURS) regarding dwelling mix, connectivity, sense of place. The density, calculated in the applicant's submissions at 30.4 units per hectare, is considered

reasonable for the edge of settlement location although lower than the 35-50 unit density recommended in the Guidelines.

Overall, it is considered that the revised proposals generally address the issues of concern raised in the notification issued by the Board to the applicant. It forms a contained, inward facing neighbourhood although a large proportion of the dwellings lack visual integration with the central open space and surface parking and roadways remain relatively dominant. However, the landscaping and tree planting scheme mitigates the visual impact.

The observations of the planning officer with regard to some of the specific aspects of the revised proposal are reasonable. As a result, there are outstanding issues which warrant further consideration. It is therefore recommended that the applicant be requested to lodge a further submission prior to determination of a decision in which the following matters are addressed:

- Provision for bat commuting corridors
- Visual dominance of roads and parking in the layout. At Nos 46-74 and 75-86
- Connectivity between the central open space and the dwellings at the north and west boundaries, the remainder of the lands and the adjoining development to the south.
- Parking spaces at a remove from dwelling units.
- Overlooking from the apartment units Nos 1-8,
- Lack of auto track analysis to demonstrate adequacy of design of roads, junctions and parking areas.

Jane Dennehy

Senior Planning Inspector

27th October, 2020.