

18th February 2022.

Draft Clare County Development Plan 2023 - 2029.

Planning Department,

Clare County Council,

New Road,

Ennis,

Co. Clare.

V95 DXP2.



Re: - Submission to the Draft Clare County Development Plan 2023 – 2029.

Reference: - Lisdoonvarna Settlement Plan Date – December 2021.

J. Ciusack.

Dear Sir / Madam,

Please find attached my Submission on Lisdoonvarna.

Yours sincerely,

Patrick J. Cusack.

Re: - Submission to the Draft Clare County Development Plan 2023 - 2029 Ref. Lisdoonvarna Settlement Plan. Date December - 2021.

I am objecting to the Draft Clare County Development Plan 2023 – 2029, Re Lisdoonvarna Settlement Plan Date - December 2021, to the land use zoning Strategic Residential Reserve SR 4 and Agriculture AG 1 at Rooska Townland in the land bank in the ownership of the Housing and Sustainable Communities Ltd., (H.S.C. Ltd.,) Area including Buffer space 4.247 hectares (or 10.49 acres).

The following are my reasons, No. 1 to No. 13for such an objection, which I believe are important, to ensure that the necessary balance in accommodation type is achieved and latest Government Policy "Town Centre First".

No. 1. In the Clare County Development Plan 2017 – 2023 Re Lisdoonvarna Settlement Plan Date January 2017 Land use zoning Residential R2 and Agriculture AG5 at Rooska Townland in the ownership of the Housing and Sustainable Communities Ltd., (H.S.C. Ltd.,) was unanimously agreed by all parties to the existing Plan on December 2016.

No, 2. It creates uncertainty that Residential Development in the Town (Facing West) progresses in a compact and sequential manner and it does not consolidate residential development in the Rooska area until year 4 (April 2027) as it is SR 4 it may not happen in the Plan period. SR 4 area including buffer space 1.880 hectares (or 4.64 acres).

No. 3. The new section of the existing Housing Estate at Rooska facing West comprising 35 houses was designed and constructed from the early - 1970s to the mid -1990s in a manner that shall provide further Residential Developments in the adjoining land bank (facing North) by agreement or other means due to necessity. To accommodate this inevitability 3 Public right of ways were part of the design and construction. Two are classified as Local Roads and the third only requires classification. The reason for this forward planning at the time (a) The land bank (Site) at the rear within safe walking distance of the Town. (b) It is small, compact, secure, easy managed, safe for future residents including children. (c) No concern, at any time, with through vehicular traffic. (d) Serviced by a Public Sewer since the 1950s.

No. 4. The Rooska Housing Estate comprising 55 houses in total, first occupied in 1954 – (20 houses) and completed in 1995. The residents are young, middle age and elderly, blending and living together. The houses are in excellent condition throughout, including the green areas and gardens. Pride of place is enjoyed by all, living there, some since 1954. Constructed in phases to accommodate the local community.

- No. 5. Number of Social Houses in the Town (Council Houses in the past, most now in Private ownership) including long term social leasing and other type of renting to the Local Authority total 90 house (approximately).
- No. 6. Recently "Gleann Breandain " Private Housing Estate, serviced by St. Brendan's Road, 24 houses are now in Social Leasing, to Clare County Council Ref. FOI 014 HS 21 Date 21/5/2021. The total number of houses in the Estate is 29 with 24 houses leased to the Council (not short Term) and from local knowledge long Term duration. In my opinion, it is a second Social Housing Estate, in this small Town, due to the numbers and extent of the leasing.
- No. 7. The Local Link Road L-1032 servicing the Land zoned AG 1 at Rooska Townland is a very busy Link Road with ever increasing volumes of vehicular traffic especially tourist traffic going to or from the Cliffs of Moher to Galway (shortest route possible). These traffic volumes, will increase going forward, as the Cliffs of Moher tourist numbers increase. Advance Direction Signage (ADS) for one reason or another is not effective and ignored by many.
- No. 8. Employment prospects in the Town considering the recent increase in population is very limited. The fallout from (Covid -19) not like other settlements on the coast with best tourist seasons ever. Lisdoonvarna had very limited tourist business in 2020 & 2021 and any recovery will be challenging. It has very little full time employment at best seasonal.
- No. 9. With the land use zoning Strategic Residential Reserve SR4 not been developed until year 4 of the Plan (April 2027) at the earliest. This provides an opportunity that the land use zoning Agriculture AG1 may be rezoned Residential area 2.367 hectares (or 5.850 acres) including buffer space for a third Social Housing Estate with no balance. No affordable housing possible as the population requirement is 10,000 Lisdoonvarna population 2016 is 800. Before the Plan is agreed and signed off my concerns could become a reality AG1 rezoned Residential with a concentration of one type of accommodation only.
- No. 10. Development Plan Objectives Social & Affordable Housing (CDP 5-5). This is the Objective of Clare County Council section (g) to insure that there is a balanced supply of Private, Social & Affordable Housing such that no settlement in the County experience an over concentration of any one type of accommodation. If AG 1 becomes a Social Housing Estate, Item (g) above cannot be adhered to. Due the actions of Clare County Council in 2007 Purchase Date and possible actions before the Draft Plan is signed of in 2022.
- No. 11. If AG1 is rezoned Residential, how does it adhere to development plan objectives Social & Affordable Housing (CDP 5-5). It is objective of Clare County Council section (d) to ensure new Social & Affordable Housing Developments are closely integrated into the structure of existing developments and not isolated from services or segregated from the surrounding community. (Extract from written statements Volume 1).

No. 12. Zoning as per Map in hectares 3.81 hectares which is equivalent 9.41 acres Part 5 requirement 10% for Social & Affordable Housing. 0.381 hectares (0.941 acres X 8 = 8 Houses). Adhering to the Part 5 requirement Residential Zoning for Social & Affordable Housing within a settlement boundary, the maximum number possible is 8 houses. If private residential development does not provide 36 houses, 20% requirement for Social & Affordable Housing could this situation create an opportunity for further Social Housing in the settlement Plan creating a further imbalance in the accommodation type in the Town. The maximum adhering to the Part 5 Requirement – 8 Houses (10%) & 7 Houses (20%) = a Total of 15 Houses for Social and Affordable Housing within the Plan.

No. 13. Recently Government launched it's "Town Centre First Policy". If AG 1 becomes Residential, it will breathe new life into our Town boundary. (Longest pedestrian distance from the Town Centre in the Plan). Also as already described, a total concentration of only one type of supply of Housing in that possible rezoned area. In conflict with Town Centre First Policy, breathe new life into our Town Centres mixed supply of Private Social & Affordable Housing reducing pedestrian distances from future residential developments to Town Centres. Any of the Government Policies could not be adhered to in any way if AG1 becomes Residential.

For the above reasons, including planning requirements (objectives) and latest Government Policies, I believe the land bank in State ownership should remain Residential (possibly R 3) and Agriculture R 5 in accordance with the County Development Plan 2017 – 2023 Date January 2017. Any other proposals, example a third Social Housing Estate could have serious implications for the possibility of private residential developments taking place in the Town in the future.

On a separate issue, I welcome the positive news of a new Secondary School in the Town. I know that the site was clearly identified for School in the North Clare Local Area Plan 2005, zoned Community Reference C1 area 3.1 hectares (7.66 acres) in the Draft Plan zoned Community C 5. It's an ideal site and can be serviced by the partially completed service road north of "St. Brendan's "Road. It is important that the new Secondary School and the existing Secondary School work together for North Clare. The new Secondary School has to be in the Town Centre. Without the New School, the Town Centre and Local Shops will not survive. The Technical competence of the Planning section who rightly so identified this Site (17 Years ago) deserve our gratitude and thanks. Well done to all concerned.