

Telephone: (065) 6867358 Mobile No: (085) 8503850

23rd March 2022

Planning & Enterprise Development Department, Clare County Council, Áras Contae an Chláir, New Road, Ennis, Co. Clare. V95 DXP2

Re: Draft Clare County Development Plan 2023-2029.

Ref: Volume 3c Killaloe Municipal District Settlement Plan

Location: Crusheen

Site: (T1) Transport Utilities.

Dear Sir / Madam,

CLARE COUNTY COUNCIL

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Received
Planning Section

Woodhaven Developments Ltd are the owners of the entire lands identified as Mixed Use (MU1), Transport Utilities (T1) and Community Lands on the North side of Village, West of the R458 ((page 43). Planning Permission has been granted and is currently on further information as regards the Mixed Use section of these lands.

The key grounds of our submission can be summarised as follows:

The submission requests that the strip of land identified as "T1 running parallel to the railway line identified as 'utilities' is reserved for any future development proposals associated with the re-opening of the train station in Crusheen" be zoned for Residential Phase 1.

GROUNDS OF SUBMISSION:

It is respectfully submitted that Crusheen but in particular this site has the potential to accommodate residential development with a compact form that will comply the proposed development plan policy.

The proposed local objective has been proposed without discussion with either Woodhaven Developments Ltd, Iarnod Eireann or local community. If the lands are left vacant or maintain their existing zoning this may have negative implications for the entire development and Iarnod Eireann.

Directors: Kevin Barry and Deirdre Barry V.A.T. Number 3278432NH



There is currently an excellent public transport provision in the form of a Bus Eireann serving Crusheen. The provision of a train stop could undermine the bus service.

The site has been reserved for the development of a railway station should the railway line -re-open a commercial service since 2005. The line has been opened for a number of years. Iarnoid Eireann have clearly stated that they have no plans for the development of a Railway Station on these lands.

The new County Development Plan should correspond with the National Transport Policy. The justification for identifying this site reserved for Transport Utilities (T1) is not supported by any correspondence or any communications with the Department of Transport or Iarnod Eireann. It is submitted that there is an absence of a clearly reasoned rationale for the inclusion of this site as currently zoned.

The net effect if the T1 zoning is maintained will be to reduce the level of new housing development in the county, effectively supporting the current ongoing housing crises over the next Development Plan period. This impact can be ill-afforded at a time when there is a pressing need to significantly increase housing delivery in the County and the Country, as set out in the Core Strategy. All statistical evidence available points to the housing crisis resulting in "crowding" within existing houses and an undesirable trend of increased household size forced upon people, arising from the significant shortfall of the provision of new housing, which National Planning Framework is seeking to provide to address the changing population dynamics in the Country. Clearly there is a need to address this in the first instance and there is a need for a significant amount of "catchup" housing to meet the needs of existing population.

It is considered that the subject site is located in an ideal location for an extension of the residential development in that it will further support the units associated with the mix use development at the entry to the development and is located within close proximity to public transport links.

Additionally, the subject site is proximate to a range of other important services and amenities such as, shop, garage, pub, church and local services. The site also benefits from a significant amount of open space within its curtilage.

The lack of supply between population and housing provision is reflected in the rise in persons per household between 2011 and 2016.

It is further submitted that Covid-19 and the closure of building sites for part of 2020 and the first quarter of 2021 will curtail the delivery of housing in the short-term and will exacerbate the shortfall identified.

The current policy of Clare County Council to purchase housing directly from Developers has created an imbalance on the availability of housing for sale to stand alone purchasers. Currently Woodhaven Developments Ltd are one of a small minority of Developers providing housing for first time buyers and those that want to trade up or down.

Assuming unchanged household formation patterns and net inward migration close to current levels, around 34,000 new dwellings would be required each year until 2030.

IARNOD EIREANN OBJECTIVES:

Clare County Council granted planning permission previously on T1 lands under P11-287 for a railway station. Iarnod Eireann did not want to proceed with this development stating the reason being the "new M18 has now been opened and access to the site P12-576 has greatly improved".

Woodhaven Developments Ltd have previously submitted to the Planning Section of Clare County Council confirmation from Iarnod Eireann that they do not want to pursue the development of a Railway Station on this T1 site.

Under Planning Permission 12-576 granted and subsequently extended Iarnod Eireann sought permission for development a new railway station which included: new 90m platform, including access ramp and steps, 15 bay car park, telecom and electrical equipment room, bicycle shelter and associated infrastructure and all required services.

If Iarnoid Eireann were to proceed with a railway station for Crusheen the preferred site is clearly identified on P12-576.



In addition to the above we refer you to Iarnrod Eireann submission no. 128 to Pre-Draft Consultation. "In expanding the railway, Iarnoid Eireann's current infrastructure investment priorities are largely focused on the roll-out of the major rail projects contained in the National Development Plan. This will deliver very significant improvements in rail over the next decade".

Nowhere in the submission is reference to the provision of a Train Station in Crusheen. Therefore there is no provision for a station within the current funding profile. The priority for Iarnoid Eireann is "the sustainable integrated transport network for the Clare County and Limerick-Shannon Metropolitan Area that could be delivered by Iarnod Eireann over the next County Development Plan period and beyond".

WOODHAVEN DEVELOPMENTS LTD:

Woodhaven Developments Ltd was established in 2015 and has developed significant expertise in leading and delivery of residential development in County Clare.

Creagaunnahilla, Clarecastle was the first major development undertaken by the Company. To date over 125 housing units have been developed in Clarecastle while over 200 housing units have been delivered in the County with developments in Ennis, Clarecastle, Crusheen & Tulla. We currently have been granted permission for another 29 units in Crusheen which is currently under construction with another 181 units in the planning process at Shannon, Crusheen and Tulla. The company team works across all stages of housing delivery, from acquisition, zoning, master planning, design and construction through sales and marketing our entire developments.

Woodhaven Developments Ltd have made / continue to make significant investment in Crusheen and County Clare incurring significant financial outlay in advancing their projects through the planning system and construction in order to meet the established demand for increased housing supply.

We continue to explore new opportunities and are actively seeking to expand our portfolio in Clare. The uncertainty caused by changing to zoning and construction standards being applied to developments is a very serious concern in this regard.

CONCLUSION:

We welcome the opportunity to make this submission on the draft County Development Plan 2023-2029.

It is submitted that there has been no rational provided for proposing the continued zoning of these lands as (T1) Transport Utilities on the south side of Village, South of Cluain Fia. Clare County Council has not submitted any business case for the provision of a railway station on the site.

Woodhaven Developments have a proven track record in the delivery of quality residential developments in County Clare. We are committed to playing our part

across our sites in achieving the provision of housing where the supply of dwellings is still falling significantly below where the demand for homes is.

It is therefore more appropriate to zone the lands contained in P12-576 than stagnating the lands T1. Surely Crusheen has no need for two railways stations.

It is respectfully requested that the Planning Authority have regard to the points raised in this submission to ensure that an appropriate planning framework is set out for the sustainable future development on our lands in Crusheen and the County as a whole.

Yours Sincerely,

Kevin Barry,

Woodhaven Developments Ltd.





