



23rd March 2022

Forward Planning Department
Clare County Council
New Road
Ennis
Co Clare

Dear Forward Planning Department,

Submission to Draft Clare County Development Plan 2022 to 2029
Site reference LDR3 in Feakle Village – [REDACTED]

On behalf of our clients Barrack Meadow Construction Limited we wish to make the following observations in respect of the draft county plan proposals for our clients' site.

The subject site was previously granted planning approval reference 06826 in 2007 with a restrictive condition relating to non commencement ahead of the Feakle sewage works, the grant withered before such treatment works were completed. No such impediment to development now exists as the infrastructure is now in place and available for connection.

Whilst the previous application was for large detached low density dwellings we consider that such new application is no longer appropriate towards the sustainable development of Feakle and community and a more sensitive denser development would be more fitting, we wish to explain why as follows:

The current County Development plan for Feakle village has a number of core strategies and states:

General Objectives

- *To encourage the consolidation and expansion of the village and its amenities and services in order to create a vibrant village to serve the existing and future population and those residing in the wider rural hinterland;*
- *To ensure that existing population levels and services are maintained;*
- *To ensure that future growth is balanced and sustainable and is relative and appropriate to the scale, size and character of the existing village;*
- *To encourage the development of visitor accommodation and tourism amenities in Feakle in order to establish the village as a base for visitors exploring the area;*
- *To promote the development of the commercial and retail sector in the village.*

It also goes on to mention flooding:

Flooding and Flood Risk

- *A Strategic Flood Risk Assessment was carried out as part of the preparation of this Plan.*
- *The SFRA in Volume 10(c) advises that the area running along by the river is located within Flood Zones A/B.*
- *A buffer is provided at this location.*

The lands referenced LDR 3 abut the Owenwillan river which lies to the South within a deep conduit with limited riparian zones which do expand towards the East as the channel shallows towards the historical pond area which formed the mill pond for the tuck mill, now Smyths shop, yard and adjacent creamery commercial hub.

The old mill leat running East from South of the Post Office has long vanished with only small traces remaining due to agricultural practices.

A considerable extent of this site is erroneously sterilised because of the perceived risk of flooding resulting from the broad brush approach to the SFRA study and a desire to create a riparian buffer zone, this makes them difficult to develop due to the residual site ratio's.

Detail analysis and topographical survey indicate that no such flooding potential exists for large sections of these lands noting that historical attenuation ponds for the two downstream located tuck mills no longer exist, see extract below:



The lands referenced LDR 3 are designated for low density housing, however, we believe this strategy is flawed and cannot be economically realised in the main because large numbers of low density houses are being constructed in the open landscape where large sites are relatively affordable or more desirable to those with or without local need.

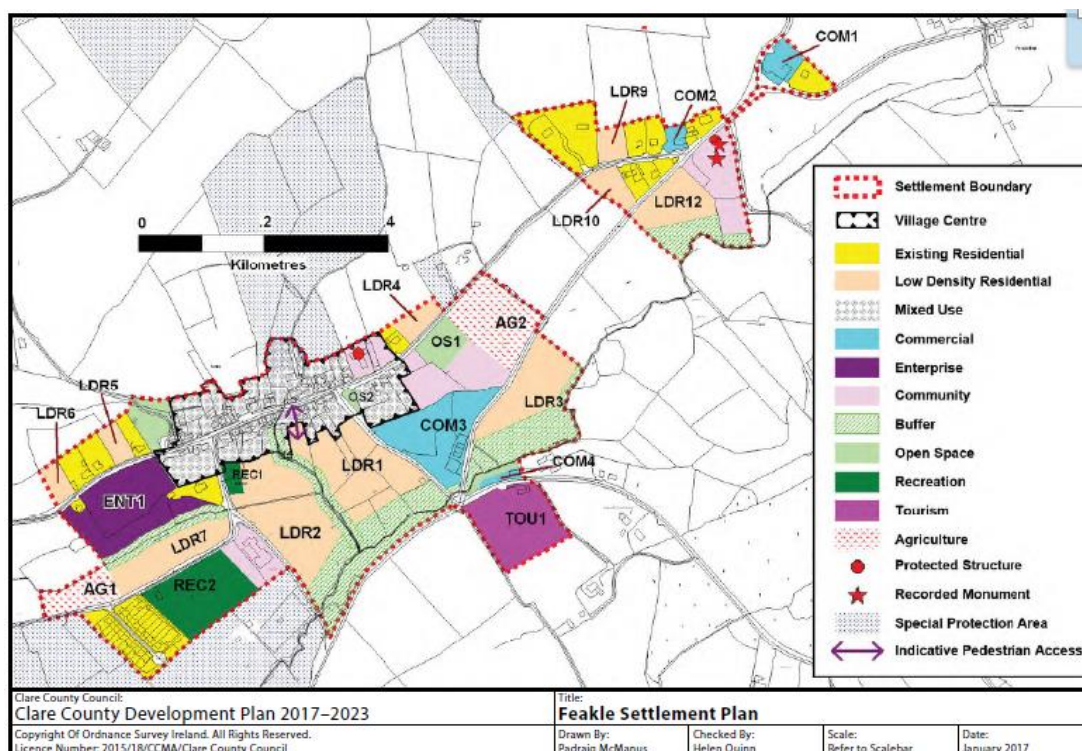
The spread and availability of these large low density houses is caused because the strategy for low density on the designated sites cannot be economically realised due to the additional infrastructure required which inflates the individual price of such homes beyond affordability, open countryside sites fulfil the need for low density residential to the detriment of the village centre and indeed the countryside.

Therefore the strategy is detrimental to the local landscape, amenity and economy and undermines the investments made in infrastructure within the village itself such as the school, church, GAA, community centre, shops, internet hub and the recently completed sewage treatment works, it also restricts the much needed investment to upgrade the existing village water treatment system.

To appropriately develop the designated sites will require internal estate roads sewers and services to be constructed, however, these costs cannot be reflected in site values whilst the open countryside competition exists and the zoned density is so low.

Accordingly, we suggest that a strategy change to designate the subject site to 'Residential' housing without density restriction would satisfy a housing need, particularly by younger or older persons with the desire for village life, this has been recently demonstrated by the demand for the new social affordable houses on the Northern section of LDR2 developed by the Council itself.

Reducing the buffer zones down to appropriate extents also enables these sites to be developed economically whilst retaining the scale and attractiveness of the buffer with potential for attractive pedestrian permeability.



Village Settlement Plan

A change of strategy for the site to encourage smaller more affordable homes with local enterprise or work from home potential (live work units) such as recently resulting from changing work practices would encourage new vitality to the village.

The internet upgrades in the village would also support such strategy for smaller live / work affordable homes and encourage a younger demographic.

The encouragement of such wider demographic spread resulting from such a strategy would create better vitality and sustainability for the village as a whole as well as supporting the existing and proposed investments in local infrastructure and reduce the need for work related transportation out of district.

Summary

Adequate provision for low density housing outside the village is being supplied in the open countryside for the relatively few who can readily afford large houses and sites and to whom such 'open countryside' sites are more attractive than within the designated sites in the village and hence they lie idle.

The development of low-density houses in a village situation is relatively costly and generally unattractive to the demographic of potential buyers or occupants for who there is little provision for affordable homes for which there is much demand.

Currently there is no designation within the village boundary to support mid or higher density housing that is in demand.

The current erroneous designation for flooding on these sites and creation of an overly wide buffer zone is an historical anomaly restricting the proper development of the village and should be assessed on merit.

A change of strategy to encourage higher densities with live work potentials within the village boundaries makes such development more affordable and more attractive to a wider demographic of buyers adding resilience and vitality to the village.

Such a change in strategy underpins all the general objectives for the village of Feakle as stated in the current CDP and allows the village to grow in a structured and sustainable manner.

Conclusion

Removing zoning restrictions within this site will enable an appropriate application to be lodged where normal due process can constrain and shape the nature of development on this site.

We therefore commend to the County Manager a variation of the Draft County development to appropriately zone this site.

Should you have any comments or queries on the above submission, please do not hesitate to contact me.

Kind Regards

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