

[REDACTED]

23rd December 2022.

Proposed Amendments to the 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 – Proposed Amendment, November 2022.

Dear Sir / Madam.

Please find attached my Submission on Lisdoonvarna.

Yours sincerely,

A handwritten signature in cursive script that reads 'Patrick J. Cusack'. The signature is written over a horizontal line.

Patrick J. Cusack.

Date : - 23rd December 2022

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

Ref : - Lisdoonvarna Settlement Plan.

Proposed Amendment. Date : - November 2022.

Following on from my Submission dated 18th February 2022 – Copy attached also the reply to my Submission No. S2/098 Chief Executives response and recommendations, I am requesting that my earlier Submission to be included as part of this Submission.

I am objecting to the Draft Clare County Development Plan 2023-2029 Re : - Lisdoonvarna Settlement Plan – Proposed Amendment Date :- November 2022 to the land use Zoning (R 3) Residential (Provision of Serviced Sites) and the land use Zoning (R 1) Agriculture 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 18 (please also refer to my earlier Submission dated the 18th February 2022) to lodging such an objection which I believe are necessary and important to ensure the much needed, some balance (urgent) in population mix and necessary 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 agreed by all parties to the existing Plan on December 2016. Member’s resolution, including mapping attached – Date - December 2016.

No.2. I am proposing that Land use Zoning (R3) Residential should be relocated to Land use Zoning (AG1) and changed from Provision of Serviced Sites to Residential Development for the provision of Social Housing. Social Housing is a necessary requirement more than ever as the cost of building a house is extremely challenging due to material costs. (Please refer to No. 2 & No. 3 reasons in earlier Submission). Area includes Buffer Space 1.880 Hectares (or 4.64 Acres). I am also proposing the Land use Zoning (R3) to be rezoned (AG 1) Area 2.367 Hectares (or 5,850 Acres) in accordance with Lisdoonvarna Settlement Plan dated December 2021.

No. 3. On the 18th of February, when I made my earlier Submission, my long term vision going forward for the land bank 4.247 Hectares (10.49 Acres) including Buffer Space

was a balance in accommodation type, (Social Housing SR4 Strategic Residential Reserve) and a mixture of Development including Serviced Sites for the native Population only (Irish People), affordable Housing and Community Facilities, Eg. Crèche, Children's Playground, Recreational Facilities on the Land use Zoning (AG1) Agriculture Area including Buffer Space 2.367 Hectares (5.850 Acres).

No. 4 In March 2018 the Population mix in the Town of Lisdoonvarna was Irish, a few English and a few Polish. Like all small Irish Towns the Irish Population in the majority and in control. In late March 2018, the Population mix in the Town changed for ever with a " Direct Provision Centre " accommodating 120 Refugees (93%) of the Population of the area rejected this proposed Centre but the Department of Justice and the Hotel owner, at the time decided to go ahead with the project. We made them welcome, and we as a community, did our best to accept this change, in this small rural Town. In March this year, the Town, was changed again, by Ukrainian Refugees. At the end of March 850 Refugees from the Ukrainian had accommodation in our Town. On the 24th of November 2022, we had 940 Ukrainian Refugees in the Town. I welcome them every way I can, as does the native population (challenging due to language issues). The Population of the Town was increased by 350% approx. since 2018 (95% approx. Refugees) The Town Population 300 approx. under the age of 30. We are one of the smallest Towns in the County with a Population of 0.7% as a County Population (Census 2016) Taken account of all the age groups 800, looking at the under 30 age group 0.26% of the Population of the County. We as a Community per Head of Population has the highest number of Refugees in Ireland, England, etc., The Balance in the Population mix is going in one direction only.

No. 5. The reason why I am strongly objecting to the (R3) Residential Zoning for Serviced Sites, firstly the density was not highlighted or the type of Housing described. At the present time (5.850 Acres) for Serviced Sites to accommodate an Irish population would take decades. The Location of the Zoning and the over Zoning we are led to believe a step down model from temporary Hotel Accommodation to Permanent Accommodation is a provision of Rapid Build Modular Homes for Ukrainian Refugees.

No. 6. The reasons why this Zoning in my opinion has to be changed (R3) Serviced Sites we already have in our small Town a " Direct Provision Centre " and creating a possible Refugee Estate (permanent accommodation), Lisdoonvarna, in my opinion the National image, would be a serious challenge, to remain as a small rural Irish Town or a Holiday Resort going forward.

No. 7. The model of Rapid Build Modular Homes for the Ukrainian Refugees in a land bank 5.850 Acres in a small rural community that has already 350% increase in its population (mostly Refugees) achieves imbalance in population mix. These Refugees

come from large cities or towns, they are under 30 mostly, single parents, due to their husbands fighting in the War, adult males Army trained, some Refugees have medical issues, used to facilities in large Towns, Accommodation previously high rise Flats. The situation in the Town is a revolving door, some coming and some going. Some of the Refugees are from other Nations as well, huge cultural and language issues not vetted by the State. Only one major employer in the Town – The Burren Smokehouse, it's an employment black spot with no facilities associated with large Towns, including a Digital Hub. Other employment sources seasonal at best.

No. 8. This Model in a Lisdoonvarna setting, will not work effectively, integration will not be a long term option. The balance in the local population will decline due to the imbalance in population mix. The sell out and get out policy, is already happening and this trend will continue.

No. 9. I believe the State has emergency powers re Rapid Build Modular Homes for Refugees from the Ukrainian and may not have to go through the Part 8 Process, to any degree, as was the case before 1995.

No. 10. I believe Lisdoonvarna as a local community, is at the end of the road, on the edge of a cliff, if Modular Homes are erected in the Residential Zoning (R3), Lisdoonvarna as a Town settlement in my opinion is gone over the cliff. Any future would be extremely challenging.

No. 11. We as a small rural community (Town) have paid a huge price for what has happened since March 2022. The local Population is in the minority. We are no longer in control. We no longer have ownership of our Town. Sadly, we are now nobodies in our own Town. We have not been consulted re these huge numbers coming into this small place, Garda Station a building only, a possibility of no Doctor who is retiring at the end of March 2023. We were led to believe this was short term.

No. 12. No Public Meetings have taken place by Members of Clare County Council to get a feedback of this proposed Zoning, from the community. We don't count anymore. The decision is made for and not by us.

No. 13. In my opinion the Office of the Planning Regulator will have to be consulted and allow him or her to decide who will be held responsible, for the local population drain and who will pay the relocation cost of the section of the population who decide to go for a better quality of life and where will they go.

No. 14. Our quality of life, our human rights, our sense of protection, our pride of place has been seriously eroded when we realise what has happened in our small rural Town without any input what so ever.

No. 15. Housing Ukrainians around the Town I have no issue with this model, I would welcome this, as it would create integration. This model worked in Ennistymon a number of years ago. Integration took place and it worked for four families.

No. 16. Enjoyment of private property, the protection associated with private property and the value associated with private property is enshrined in law for centuries in most developed Countries. If (R3) Residential provision of serviced Sites gives a green light (licence) to erect Rapid Build Modular Homes for Refugees through emergency powers by the State, the above right will be seriously undermined. In my opinion, it is a legal issue for the State seeing that the Part 8 challenge may have been removed. The protection of the existing Residential amenity would be completely undermined by Rapid Modular Homes for Refugees from the Ukrainian.

FOR THIS REZONING (AG1) AGRICULTURE AT RDOSKA RE
No. 17. In my opinion the Elected Members of the West Clare municipal District have to take full responsibility for this over Zoning (R3) Residential provision for Serviced Sites, considering what changes, which have taken place in the Town. In my opinion, in appropriate and premature. Removing 4.64 acres for Social Housing, nearer the Town centre Ref. (SR 4) Strategic Residential Reserve December 2021 cannot be justified where there is so many waiting for a social houses in the Country and would create, much needed balance in the population mix, in the Town (it beggars belief) This ~~de~~ zoning to (AG1) Agriculture land use, is it left underdeveloped, for further Modular Homes in the future. For the record no provision for Serviced Sites in Ennistymon, Lahinch or Corofin. When a section of the local population, decide through no fault of their own, to leave the Town, who will cover all the expenses associated going to normal Towns and Villages, if they can't get permanent accommodation, will they have to use Mobile Homes. The vast majority of the population mix in the Town will be non-Irish / non-European. Balance completely ignored.

No. 18. Serious lessons have to be learned from the Mullaghmore / Burren National Park Interpretive Centre, Challenge in 1991, the outcome the Part 8 Planning requirement, also Derrybrine, Gort in 2003, which the State, is still paying a daily fine, due to damage to the Environment. The question is, who will guarantee that Lisdoonvarna as a small Irish rural Town will survive.

Booklet 2

copy

Members Resolution
to make the Clare County Development Plan 2017-2023 in
accordance with Section 12(10) of the
Planning and Development Act 2000, as amended.


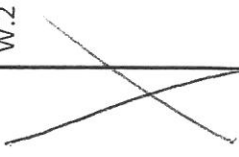
**West Clare Municipal District
Written Statement and Maps**



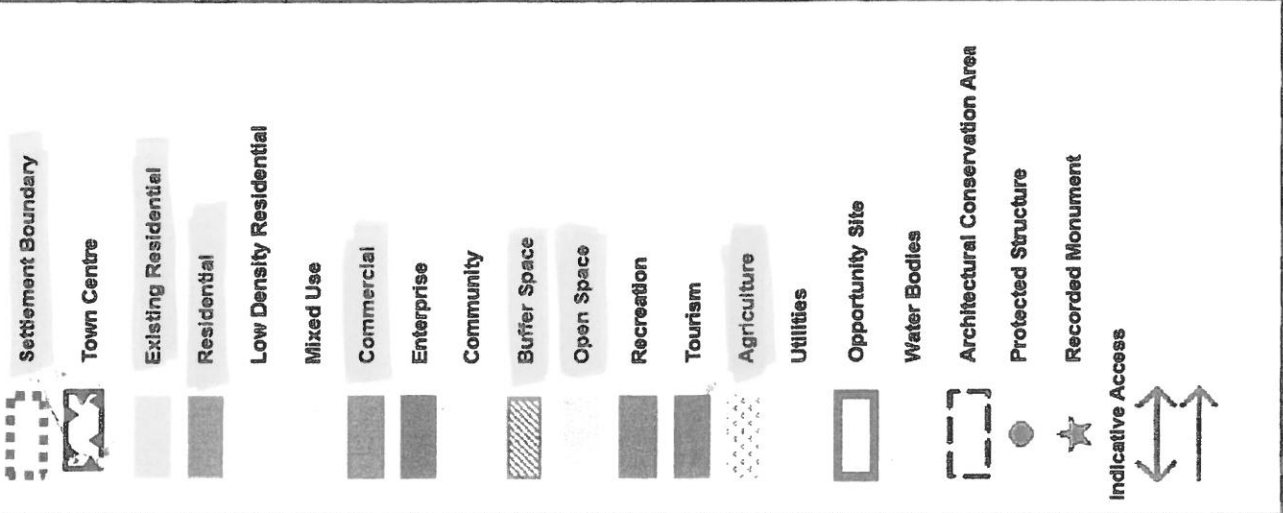
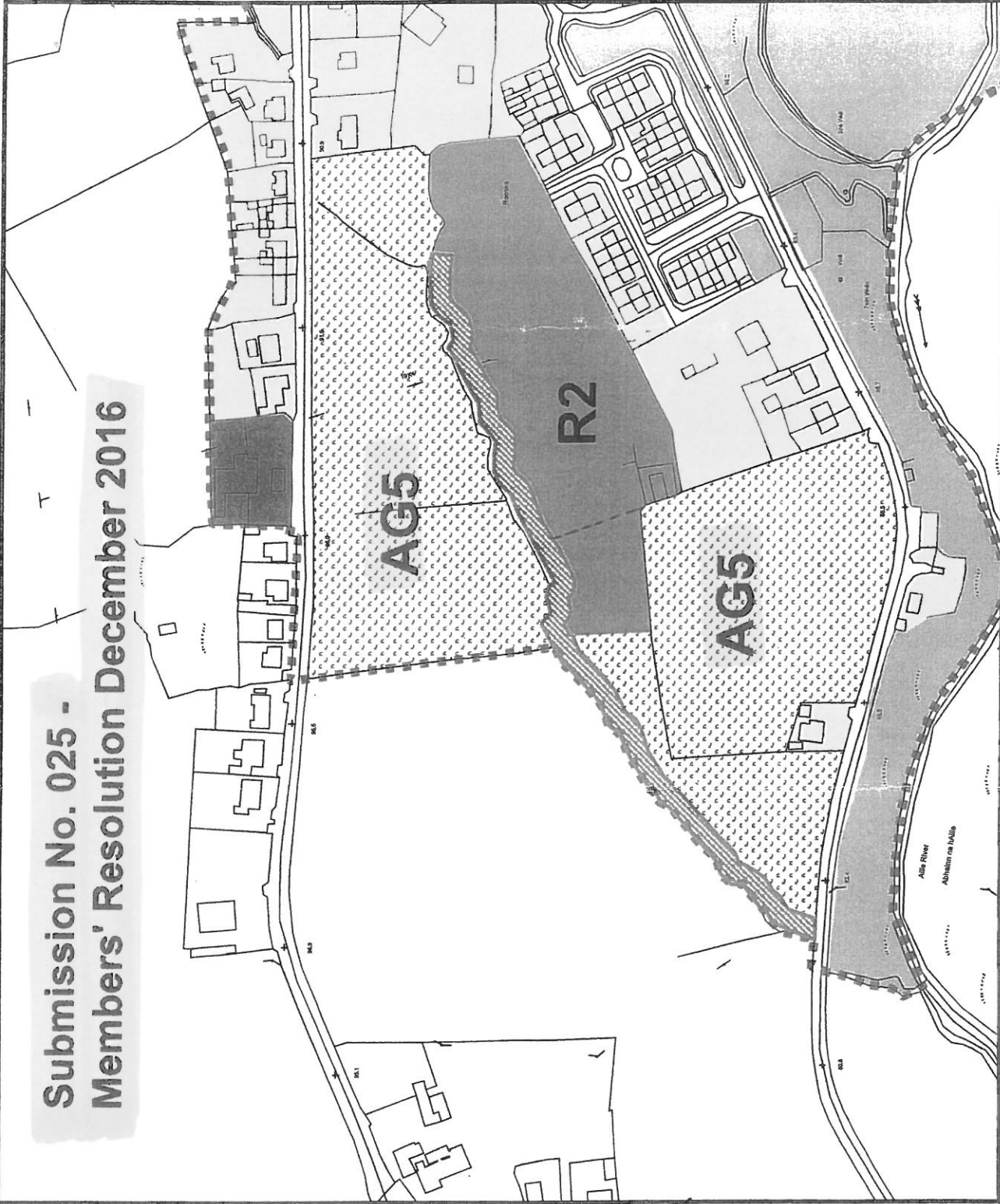
Comhairle Contae an Chláir
Clare County Council

COPY

West Municipal District - Members' Resolution

Resolution Ref.	Submission Ref:	Settlement	Resolution	Members' Reasons and Considerations
W.1 	001	Kilrush	To retain the Residential zoning on lands at the Kilkee Road, Kilrush (Site R12), as per the Proposed Amendment to the Draft Clare County Development Plan 2017-2023.	Kilrush is an identified Service Town and it can accommodate further population growth. The site is reasonably close to the town centre, there is a need for further housing in Kilrush and planning permission for residential development was previously granted on this site.
W.2 	025	Lisdoonvarna	To change the location of the area zoned for Residential development within the overall landholding and to include addition text in the plan to indicate that construction traffic must access the site via lands to the west of the existing housing development, but thereafter all access and egress to the site must be via the Rooska housing estate.	To ensure that residential development in the town progresses in a compact, coherent and sequential manner and to consolidate existing residential development in the Rooska area of Lisdoonvarna

Submission No. 025 - Members' Resolution December 2016



Copyright Of Ordnance Survey Ireland.
All Rights Reserved. Licence Number:
2015/18/CCMA/Clare County Council

CLARE
COUNTY
COUNCIL

DRAFT CLARE COUNTY
DEVELOPMENT PLAN
2017 - 2023

Drawn By: Padraig McManus

Checked By: Helen Quinn

Lisdoonvarna Settlement Plan

Not To Scale

Date: DECEMBER 2016

18th February 2022.

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. 13 for 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.