

Submission No: 020



WOODHAVEN DEVELOPMENTS LTD.

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Development Plan Review,
Planning Department,
Clare County Council,
Aras Contae an Chlair,
New Road,
Ennis,
Co. Clare.
V95 DXP2.



6th November 2020

Re: Development Plan Review.

A Chara,

While welcoming the preparation of the new County Development Plan for County Clare, Woodhaven Developments Ltd. submits the following comments and observations to your request for pre-draft submission.

The policies and objectives The Clare County Development Plan should have the interest of the people of the county and the proper planning and sustainable development of the plan area at the very core of the plan.

Having completed 220 housing units at Creggaunnahalla, Clarecastle, we have currently under construction 42 housing units at Ballymacaula, Ennis, 42 housing units at Cluain Fia, Crusheen & 17 housing units at Tulla. In addition we are currently reviewing a number of others sites that we have and that we would like to purchase and develop. We are concerned about continuity.

In your Strategic Issue Paper you ask:

How and where can County Clare provide for the housing needs of all groups, including older people, people with disability, the homeless etc.?

How can we encourage the provision of house types in our towns and villages for all life stages.?

Directors: Larry Brennan, Kevin Barry and Bernadette Brennan (Secretary)

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How can we encourage innovation and new type of houses which deliver on people's preferences, in a sustainable manner.?

The answer to these questions is simple, genuine engagement with all stake holders that can satisfy the above needs.

As a Developer within the County we would request that the new development plan would offer a certain amount of certainty to those that want to invest in development in the County. Alternating zoning or de-zoning of lands every 5 years does not support development within the County. The aim of the plan should be to achieve population growth within the county during the lifetime of the plan. Therefore it would be imprudent to de-zone housing lands that have been identified as being suitable for development and are located close to the centre of settlement.

Your Council have previously got bogged down on the quantum of lands zoned for housing and the restrictions of same being placed on them by the relevant Government Department.

In addition we would also like that the interpretation of compliance with the development plan by Developer be treated similar to application by your Council under Part 8 applications. A two tier system has evolved with totally different treatment.

It is our contention that there is no point in zoning lands for a particular purpose without the support of the actual land owner to develop accordingly. This should be a living document rather than a wish by the planning authority as regards future development for the County. The existing plan should be the base document for the new plan with your Council endeavouring to better the existing rather than a complete new plan where all will be familiar with the contents.

The new plan should contain a non technical summary in order to provide a clear understanding of the decisions regarding the making of the development plan. This will ensure that the key issues will be readily understood and in so far as is possible the use of technical jargon is omitted.

The new plan should encourage development within the County by containing a clear statement of encouragement and assistance by the Council towards potential projects that comply with the zonings contained within the plan.

The current plan has evolved into 10 volumes which makes it very difficult to review, and confirm compliance.

We submit under the following:

Transport & Land Use:

Planning are fundamentally linked and uses should be structured so that the need for travel and reliance on the private car is minimised.

Commercial / Industrial:

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There is a clear need for the extension of Quin Road Business Park to accommodate future investment in the Town. Gort Road & Ballymaley Business Park is at capacity. SFADCo. have Zoned Lands at Our Lady's Hospital grounds that they have failed to develop over the lifetime of two Development Plans. Now that the Ennis Main Drainage works are completed to the Banks of the River Fergus it is time for a natural extension of Quin Road, Business Park.

The lands are located within walking distance of a number of amenities in the surrounding area including public transport within walking distance of the lands. The new plan needs to take account for updated information on shopper behaviour and the need to restrict travel including having regard to the promotion of Smarter Travel options.

Substantial amounts of lands have been zoned for Tourism, Enterprise and Employment purposes. Whilst the reservation of such lands is welcomed consideration should be given to the infrastructural deficits and adequacy of services in the determination of the location and extent of lands which are to be zoned in the planned area.

Previous Plan made provision for the linking of this estate to the Limerick Road vis. Clare Abbey.

Housing:

We fully concur with the principal 'use it or loose it'. Your Council has been zoning lands simply to comply with the department's requirement. Quiet a number of lands zoned for Housing held in private ownership can never be developed due to visibility, lack of services, costs associated with development etc. The 2017-2023 Development Plan sought to forecast growth during the plan but, in practice the projections have not been matched by reality. The development of housing within the County has changed considerably and there is a clear need for updated information on Social, Affordable and Home for rental resulting from the recent downturn in the economy brought about by Covid 19.

The Housing Section of Clare County Council should be requested to submit a schedule of lands suitable for the provision of the Council's own housing programme for the lifetime of the plan. The Core Strategy of the Clare County Development Plan should identify the need to ensure that sufficient and suitable land zoned to meet the requirements of the Joint Housing Strategy. The provision of suitable accommodation for all residents of the County is one of the key elements of the plan and should be the basis of the Joint Housing Strategy. This should help with the ability of the Housing Directorate to address housing need within the plan area.

Water / Waste Water.

While there is a lack of infrastructural services in the planned area a detailed survey of same should be included with the plan in order that future investment can be channelled to the area where services are available. This issue has been highlighted by representatives of the Construction Industry Federation to the relevant SPC for the

County. Priority within the plan area should be channelled to areas within the Limerick / Shannon/ Ennis corridor.

Commercial:

The identification of Lands for Mixed Use has lead to concerns as regard to interpretation. The % of Lands for housing as against commercial generally had to be established through appeals to An Bord Pleanala. In addition to requirements for the provision.

General:

It should be stressed to Planners that the insertion of planning conditions should have regard to the Development Plan and conditions should not be inserted where there is no policy or evidence base to support the precise mandate within conditions.

In addition there is a need to restrict special planning contributions being attached to planning conditions and same should be incorporated into the general scheme of contributions. Zoning of lands should take account of availability of adjoining road network, roundabouts, services, public lighting and extension of footpaths.

Finally we wish your Council good wishes as regard progressing this new plan that hopefully will encourage growth and development within the County during the life time of the plan. Our support and assistance is available if required.

Is mise,



Larry Brennan.