

From: Fergus John Merriman [REDACTED]
Sent: Tuesday 2 May 2023 15:14
To: Development Plan
Subject: Submission to the Draft Direction on the Clare County Development Plan 2023-2029

Dear Forward Planning,

Following the Ministers direction on the adoption of the Draft Development Plan I wish to make the following observations on residential rationale:

1. The Ministers proposals are in direct conflict with local democracy.
2. The Clare housing-delivery-action-plan-2022-2026 suggests a significant shortfall in housing provision.
3. The national housing crisis resolution allocation is being directed to Limerick and Galway with Clares ability to provide housing being depleted.
4. Not all residential zoned land can be developed for many complex reasons (despite the Gov initiatives and penalties) so an adequate diversity of zoned land is required to ensure an adequate housing provision.
5. CDP19.2 states the objective of Clare County Council:
To ensure that sufficient lands are zoned at appropriate locations in the settlement plans and local area plans of the County, in accordance with the Core Strategy population and housing targets, in order to meet the envisaged land use requirements of the area during the lifetime of this development plan. The Ministers directions are in conflict with local consideration of this key objective achieved by local consultation and appropriate local assessments.
6. The National population trends according to the CSO will probably exceed available statistics due to the addition of migration and refugee influx stressing housing provision projections.
7. Some infrastructure serviced sites formerly zoned residential have been changed for reasons hidden from public scrutiny.
8. De-zoning sites without WWTP infrastructure removes the impetus for investments required by communities who already lack and urgently require such service.
9. Coordination with Government proposed policy for sustainable and compact settlements appears to be missing and in fact cannot be achieved in many instances until the Clare CDP withers in 2029 - possibly too late for this important sustainable initiative.

In addition, I wish to make a further observation regarding the rejection by the CEO of my submission S3-026 to the Draft CDP 2023-2029 in relation to land at Clarecastle in that on the surface there appears to be no obvious rationale for open space zoning on brownfield land within the village boundary that: has all infrastructure, is protected from flooding by OPW investments, could enhance the village and that previously had planning for residential development. My question is, what reason is there that prevents the natural development of housing or indeed any development of this site during a housing crisis by the CEO's allocation of open space upon it other than for diminishing its value by covert intention?

Regards

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