



Clare County  
Development Plan  
**2023-2029**

## **Draft Clare CDP 2023-2029 - Public Consultation Portal**

**Submitted By: Anonymous user**

**Submitted Time: March 15, 2022 2:31 PM**

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### **Volume 1**

Core Strategy, Settlement Strategy and Housing

### **Volume 3(a) Ennis Municipal District Written Statements and Settlement Maps**

## **Volume 3(b) Shannon Municipal District Written Statements and Settlement Maps**

## **Volume 3(c) Killaloe Municipal District Written Statements and Settlement Maps**

Tulla

## **Volume 3(d) West Clare Municipal District Written Statements and Settlement Maps**

### **Associated Documents**

None of the above

### **Environmental Reports**

None of the above

### **Your Submission**

### **Location Map**



## Upload Files

Submission Clare County Development Plan Declan Moroney Tulla.pdf, 4.19MB

Draft Clare County Development Plan 2023-2029,  
Planning Department,  
Clare County Council,  
New Road,  
Ennis,  
Co Clare.  
V95 DXP2

Date: 14th March 2022

**Re: Submission to Draft Clare County Development Plan 2023-2029 regarding lands at Tulla, Co. Clare**

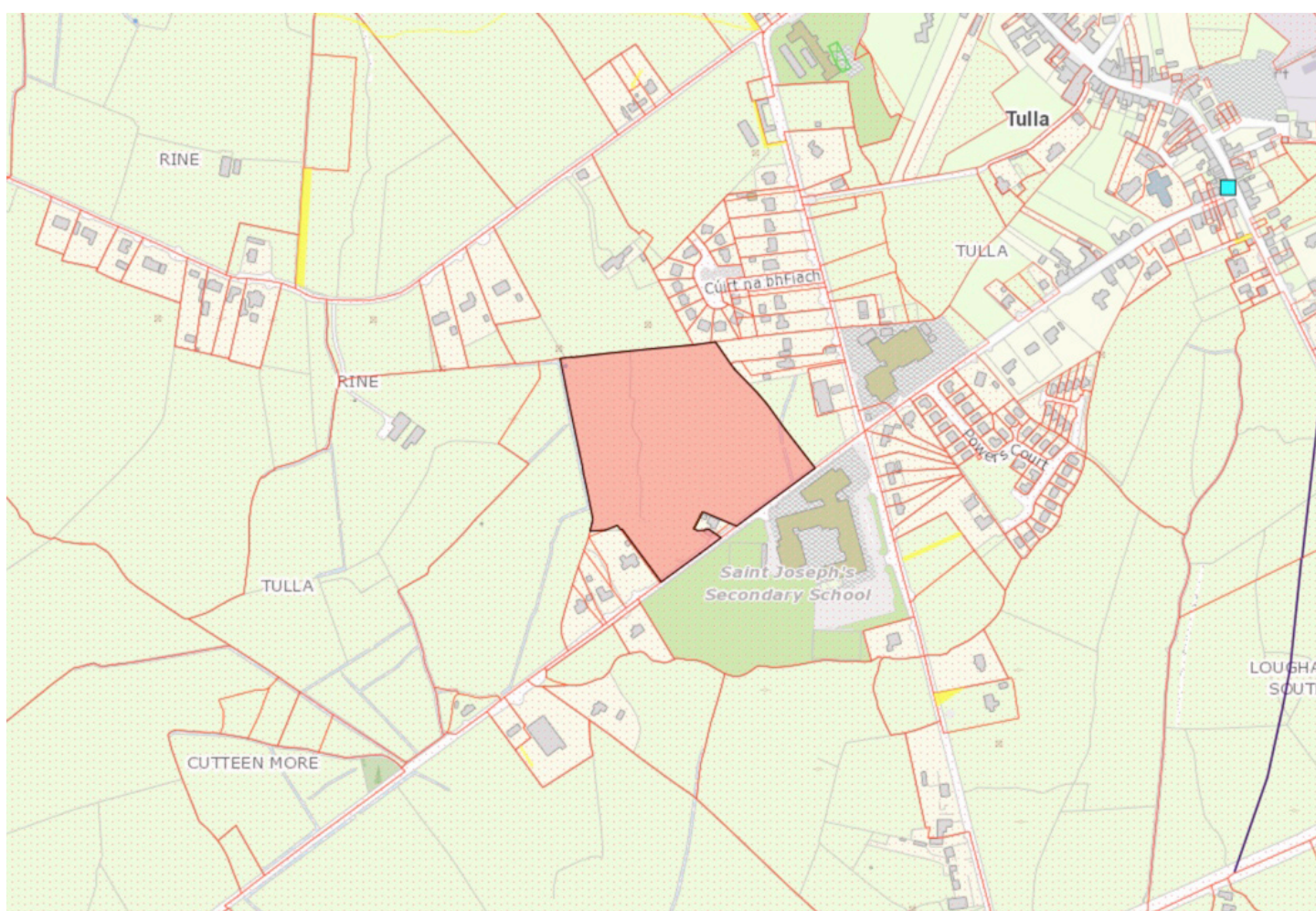


Figure 1- - Screenshot of Development Site owned by my client at Tulla Co. Clare



## 1.0 Introduction

I, Andrew Hersey Chartered Town Planning Consultant MIPI am acting on behalf of my clients Rockfort Developments % Declan Moroney, of Tulla Co. Clare. My clients own the lands marked on the map above. I have been asked by my clients to examine the Draft Clare County Development Plan 2023-2029 and prepare a submission seeking to zone these lands for residential use.

My clients own 3.98 hectares at this location and permission has been granted for a housing development of 35 residential units on the eastern party of the site and which comprises of 1.829ha. (Planning Reg. Ref. P20-969 applies see site layout plan in appendices) I further note that a nursing home has been granted permission on the western part of the site but this permission has now lapsed. Details of these applications are set out further on in this report.

My client notes the Draft Clare County Development Plan 2023-2029 (hereunder referred to as the Plan) and in particular Volume 3c Killaloe Municipal District Settlement Plans which contains a zoning map, and various policies and objectives which relate to Tulla. My client notes that the western part of the site is zoned for Community use and the eastern part on which there is planning permission for 35 houses is now zoned as Strategic Reserve (Residential) in the said plan

My client considers that the entire site in question is more appropriate for residential use and would consider that it is more suitable than other sites zoned for residential use in the settlement.

With respect of the above and having regard to the fact that there is already in existence permission for 35 residential units on the eastern half of the site, my client considers that the entire site be zoned for residential purposes.

My client's site could accommodate substantial residential accommodation in a central location which is proximate to and within walking distance of the town centre and is across the road from a newly constructed post primary school. My client considers that this site is 'shovel ready' and construction can begin once planning permission is secured for further housing on the western part of the site.

It is noted from [daft.ie](http://daft.ie) that there is only one single house for sale in Tulla at present and that there are no houses for rent. I understand from my client that all of the houses currently under construction have been sold. There is therefore a strong demand for housing in the town. Developing these lands therefore would alleviate pressure for housing in Tulla.



The following document therefore sets out a rationale as to why my client's lands are suitable for residential use. The zoning my client's lands for residential use would be compliant with national and regional development plans and Section 28 (of the Planning & Development Act 2000 as amended) Planning Guidelines issued by the Department of the Environment, Heritage and Local Government and the Housing for All strategy as set out below.

## 2.0 Policy Context

***Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009.*** A fundamental principal of proper planning and sustainable development is that sustainable transport is inextricably linked to land use. Residential housing should be located where there is good public transport, and safe pedestrian and cycle links to town and city centres, transport hubs, services and amenities. This principal encourages walking, cycling and dependence on the private motor vehicle is reduced. This fundamental planning principal is set out in ministerial *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009*. The principal focus of these guidelines is the provision of sustainable residential development and the promotion of development that prioritises walking, cycling and public transport, and minimises the need to use cars

***The National Planning Framework 2040*** is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

***Regional Spatial and Economic Strategy for Southern Region 2019-2031*** which provides a high-level development framework for the Southern Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government.

Both of the above plans support the *Sequential approach* when it comes to the zoning of land. Brownfield and greenfield sites in the town or village centre should be prioritised for development and then once they are developed greenfield sites at the outer edge of of the centre of village are developed.

The ***Planning System and Flood Risk Management Guidelines for Planning Authorities*** (November 2009 Department of Environment Heritage and Local Government). The core objectives of the Guidelines are to (a) Avoid inappropriate development in areas at risk of flooding and (b) new developments increasing flood risk elsewhere, including that which may arise from surface water run-off.

The ***Housing for All*** strategy published by the Irish Government on 2 September 2021, will replace the 'Rebuilding Ireland Strategy' launched in 2016. It has been dubbed the "single largest investment in housing since the 1960's".



In order to address Ireland's continuing housing crisis, the Plan will require the public and private sector to work together to reach the overall target of 300,000 homes by 2030, the breakdown of which is as follows:

- 170,000 homes for the private market;
- 90,000 social housing units;
- 36,000 affordable housing units; and
- 18,000 cost rental properties.

In order to reach the above lofty goals the State intends to spend €4 billion a year to 2030 on various State interventions and capital investments.

The Department of Housing commissioned a report from the Economic and Social Research Institute (ERSI), which indicated that an average of 33,000 new homes needed to be built a year in order for the housing crisis to be successfully addressed by the Government. In order to achieve the goal of 33,000 new homes per year, the Plan provides four pathways to achieving four overarching objectives:

- Supporting home ownership and increasing affordability;
- Eradicating homelessness, increasing social housing delivery and supporting social inclusion;
- Increasing new housing supply; and
- Addressing vacancy and efficient use of existing stock.

### **3.0 Draft Clare County Development Plan 2023-2029**

#### *3.1 The Core Strategy*

The Draft Clare County Development Plan 2023-2029 sets out the overall strategy for the proper planning and sustainable development of County Clare for the six year period 2023-2029. The document comprises of a written statement which sets out the development strategy comprising of policies and objectives supported by mapping and in particular zoning plans for each of the settlements within the county.

The core strategy for the county, as set out in Chapter 3 of the draft plan, proposes population targets for each town and village within the county and that sufficient lands are zoned for residential use to meet those targets. It is noted that the population allocation for Tulla between 2023-2029 is an increase of 81 persons which equates to 42 houses. With respect of the same 2.29ha of land are required to be zoned to construct 42 houses. I note in this regard that 5.57ha of land has been zoned in Tulla for residential purposes

I also note that the draft plan priorities key settlements for housing in what is referred to as the settlement hierarchy. The highest priority is afforded to Ennis which is designated as a Key Town while the lowest priority is given to small villages such as Broadford or Barefield. Population allocations are prioritised in the the higher priority settlements in the settlement hierarchy. I note in this regard that Tulla is designated as a Small Town in the settlement hierarchy.



### 3.2 Overview of other Proposed Residential Zoned Lands in Tulla

The core strategy proposes 5.77ha of land to be zoned to meet the future residential requirement of Tulla during the plan period 2023-2029. This represents an increase of 81 persons which equate to 42 houses.

The following lands have been zoned for residential development in the Draft Plan.

R1 -already has permission for housing on it under P19-765 *to construct 37 dwelling houses consisting of 3 two bedroom single storey semi detached/terraced houses, 6 three bedroom single storey detached houses, 6 four bedroom two storey semi detached houses and 22 four bedroom two storey detached houses including all associated roads, services, foul water pumping station, landscaping and road improvement works along front of site including new footpaths and re aligned junction with the R462*

R2 -no applications on the site. I have been informed by my client that not all of the lands will be developed as they are in different ownerships

R3 - no applications on the site. Previous planning applications on this site were refused permission. I understand from my clients that an application for residential development will be lodged on this site shortly.

SR1 - my clients site which already has permission. It is suggested in this regard that the value of the site has been diminished by zoning the land from Low Density Residential to Strategic Reserve.

SR2 - It is understood that an application will be lodged shortly

SR3 - will be difficult to develop as access to the site (shown as a brown narrow strip from Chapel Street is in different ownership

I refer to page 67 of the Core Strategy (2nd paragraph) which sets out the rationale for the Housing Supply Target and zoning lands and which states *'lands with an extant planning permission are deemed not to be within the housing land requirement for the plan period and are in addition to that land'*

With respect of the same it is not clear as to why these lands are zoned R1 as there is an extant permission on the site. As per the Core Strategy lands with extant permissions are not taken into account in the Housing Supply Target for Tulla. This site comprises of 2.689ha and therefore rationally, it can be construed that an additional 2.689ha can be zoned for residential use.

Equally, my clients site which is now zoned SR1, has permission for 35 units under P20-969. Again it is not clear as to why these lands are zoned as strategic reserve lands when there is already a permission on the





same. With respect of the same, it can be construed that an additional 1.829ha of land could be zoned in the settlement for strategic reserve use.

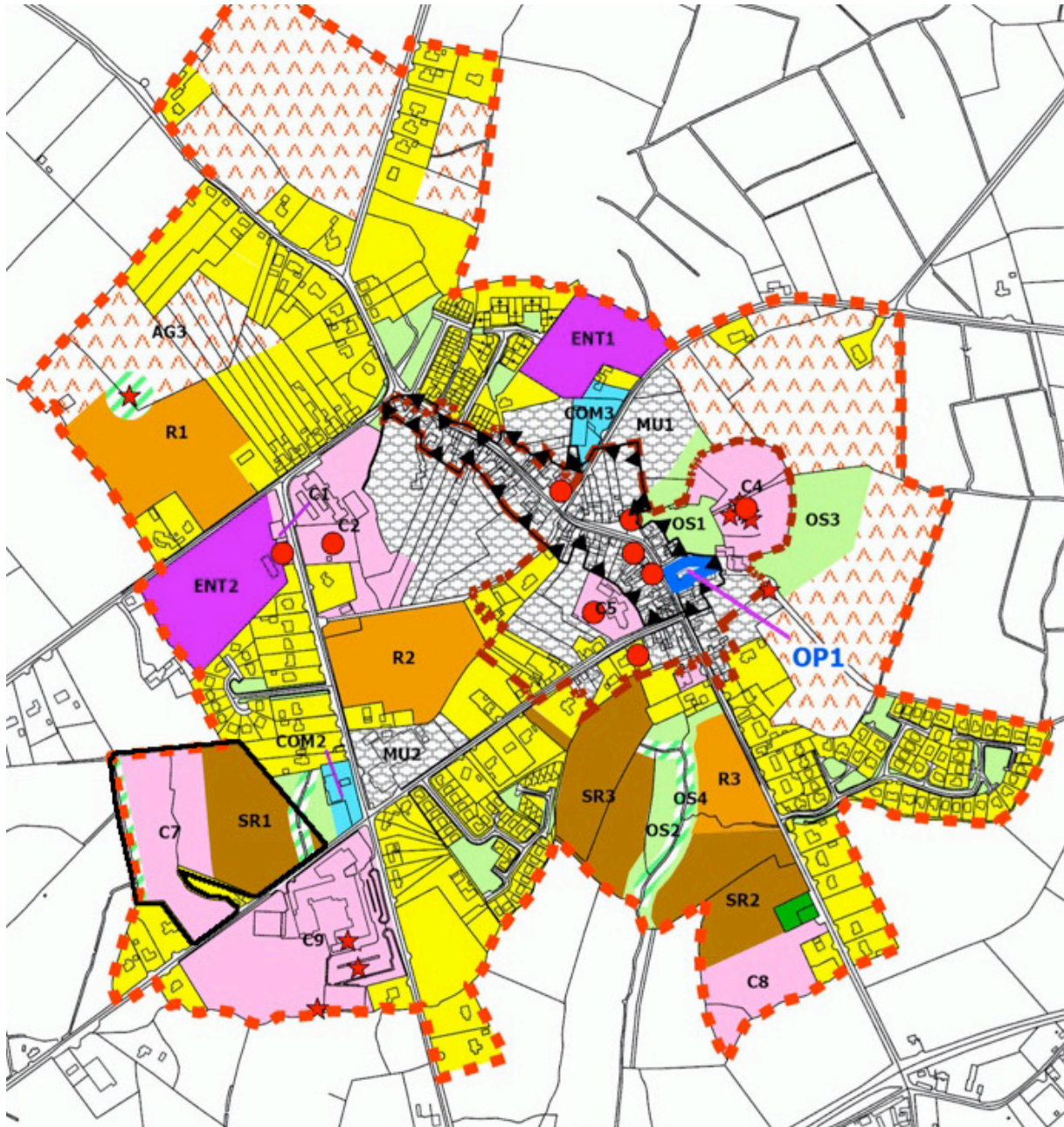


Figure 4 - Screenshot of Zoning Map for Tulla showing my clients lands outlined in black

### 3.3 Need for additional zoned lands in Tulla

Tulla is a growing settlement circa 18km from Ennis and a 20 minute commute. There is employment locally at Beckman Coulter Diagnostics which employs 390 persons and which recently underwent expansion.



McGraths Quarries is also located closet the town as well as other smaller indigenous businesses all of which contribute to local employment opportunities within a short distance of the village.

There are a number of residential construction sites under construction in the town at present and it is understood that all the housing units in these schemes are sold out. With respect of the above there is a clear demand for housing in this growing settlement. According to [daft.ie](http://daft.ie) there is only one house for sale in the town and there is no rental accommodation available at present. Clearly therefore there is an urgent demand for more housing.

I refer to the draft plan which states under Chapter 3, The Core Strategy that:

*The Core Strategy has also been prepared and informed by the Housing Strategy and the Housing Need and Demand Assessment (HNDA). In addition, the following local context has informed the approach: The allocation of population growth to the settlements on a sustainable tiered approach based on the settlement hierarchy, the infrastructure services, demand, past delivery, jobs to resident workers ratio and potential growth. This means that settlements will grow at an appropriate rate and at a more self-sufficient level, thereby reducing the need to commute;*

It is clear therefore that target population forecasts and subsequent land zoning is based not just on on incremental grown but it is also based on demand , past delivery, and accommodation for resident workers

Settlement Typology	Settlement	2016 as a % of County	2016 Population	Core Strategy 2023-2029 Population Allocation	Housing Units	Brown Field (30%)	Density Units/ha	Housing Land Required in Ha	Zoning as per map in Ha
Service Town	Ennistymon/Lahinch	1.3	1,567	223	116	35	25/10	6.33	9.65
	Kilrush/Cappa	2.1	2,489	355	185	56	25/10	10.10	12.32
	Scarriff/Tuamgraney	0.7	805	113	59	18	20/10	3.72	6.08
<b>Totals</b>		<b>4.1</b>	<b>4,861</b>	<b>691</b>	<b>360</b>	<b>108</b>		<b>20.15</b>	<b>323.79</b>
Small Town	Kilkee	1.0	1,155	123	64	19	20/10	4.03	7.21
	Killaloe	1.2	1,393	148	77	23	25/10	4.20	5.87
	Lisdoonvarna	0.7	800	85	44	13	20/10	2.77	3.81
	Miltown Malbay	0.6	769	83	43	13	20/10	2.71	2.48
	Newmarket-on-Fergus	1.7	1,968	209	109	33	25/10	5.95	6.82
	Tulla	0.6	759	81	42	13	25/10	2.29	5.77

Figure 2 - Screenshot of Table 3.4 Core Strategy Table Clare County Development Plan 2023-2029



With respect of the above, I am of the opinion that there is scope to zone further lands in Tulla as there is a clear need to accommodate the existing population growth and resident workers of Beckman Coulter Diagnostics, McGraths Quarries and other local service providers.

I refer to the Tuamgraney/Scarriff settlement which is given the higher status as a Service Town in the draft plans settlement hierarchy whilst at the same time is of a similar population to Tulla (Tulla 759 persons and Scarriff/ Tuamgraney 805 person). I note that the proposed population increase in the Draft Plan for Scarriff/ Tuamgraney is 113 persons or 59 houses whereas the proposed population increase for Tulla is 81 persons and 42 houses. Greater priority for housing and population increase is therefore attributed to Scarriff/ Tuamgraney due to its Service Town status.

It is suggested initially that Tulla should be prioritised in terms of the settlement higher and designated a Service Town over and above Tuamgraney/Scarriff. There is no rationale within the plan as to why Scarriff/ Tuamgraney is given a higher status than Tulla in the settlement hierarchy. While collectively the two villages would have a higher population than Tulla, individually they would not. It is further suggested that this will not be the case going forward as more housing development has taken place in Tulla over the last number of years over that of Tuamgraney/Scarriff. The Census of Population which is taking place this April will reveal that this is the case.

With regard to Tuamgraney/Scarriff, there are no large employers in the settlement. Finsa Forest Products closed in 2012. I note that there is currently 6 houses for sale in Scarriff according to [daft.ie](http://daft.ie). The demand for housing therefore is not as strong as it is in Tulla.

Tulla has two large employers locally, Beckham-Coulter Diagnostics and McGraths Quarries. There are good services and retail offerings in the town including a large convenience retail outlet, building and agricultural suppliers a new post primary school and I also understand that there further sporting facilities under construction. . In respect of the same I am of the opinion that Tulla should be granted a higher status in the settlement hierarchy and designated a Service Town for the East Clare Municipal District over that of Scarriff/Tuamgraney and that population and lands zoned for residential use be increased in the town.

I also refer to Killaloe where a population increase of 148 persons are proposed in the core strategy which equates to 77houses. There is no capacity in the public sewer to serve more houses and there is no date set for its upgrade. To zone lands therefore that cannot be developed is inappropriate in this context and it is suggested that lands should not have been zoned by the local authority for residential use as this is contrary to the provisions as set out in the National Planning Framework 2040.



Tulla has capacity in the municipal sewer and therefore in accordance with the NPF 2040 should be prioritised for development over other settlements in East Clare.

With respect of the above therefore, I am of the of the opinion therefore that

- (i) Tulla should be granted a higher status in the settlement hierarchy in the Draft Plan and designated as a Service Town over that of Scarriff/Tuamgraney and that consequently more lands are zoned for residential use in the town
- (ii) That further lands be zoned for residential use in Tulla to make up for the shortfall that results as a consequence of:
  - the fact that there is extant permissions on lands zoned as R1 and SR3.
  - the fact that planning permission cannot be granted on lands zoned for residential use in Killaloe as there is no capacity in the public sewer to accommodate the same. To accommodate the future population of East Clare therefore further lands should be zoned in settlements such as Tulla which can accommodate further development.
- (iii) the fact that there is currently a strong demand for housing in Tulla

In this respect, it is suggested that the entirety of my clients lands be zoned for Residential use.

#### **4.0 Site Location**

The site is located within a 10 minute walk of the town centre where there are numerous shops and services. The site is also located adjacent to a cafe, a shop and fuel service station, a garden centre and the new primary school.

There is a bus stop located at O'Hallorans Service Station which is located adjacent to the site. Buses from here travel towards Ennis to the west and Tuamgraney to the east. There is less than a 20 minute travel time to Ennis by private motor vehicle from the proposed developments site.

With respect of the same this is a highly convenient location for the development of a residential development.

#### **5.0 Services**

It is noted that there is mains water and mains sewer located on the adjacent public road which my client can connect into. In addition, I understand that there is capacity in the municipal wastewater treatment plant to cater for future residential developments in Tulla. In this respect, the lands are serviced and therefore in accordance with the National Planning Framework should be prioritised over lands which are not served by water and sewerage connections (such as lands zoned in Killaloe)



## 6.0 Planning History

(Western portion of the site) Planning Reg. Ref. P20-969 granted permission to Rockfort Developments for a residential development comprising 36 no. residential units (14 no. detached houses), 16 no. semi-detached houses and 6 no. terrace houses), an entrance and all ancillary site development works on lands at Tulla, Co Clare. Ancillary site development works include a new connection to the public water main and foul sewer, a foulwater pumping station and surface water drainage and attenuation, new entrance and access roads, footpaths (including new footpath along public road L4078 with connection to existing town footpath), vehicle parking, landscaping, boundary treatments and site development works above and below ground. This permission was modified by way of condition by the omission of a single unit so there is 35 units granted. This permission expires 17/08/2026. My client intends to develop this site shortly. See appendices for screenshot of site layout plan

(Eastern portion of the site) Planning Reg. Ref. P13-455 granted permission to to amend/alter planning granted Reference no. 09/1278 to incorporate following changes: Removal of condition no. 24; incorporate phasing of the proposed nursing home and car park development; provide revised road side boundary, boring of well and all associated site works. This permission has now expired

Planning Reg. Ref. P09-1278 granted permission to construct 60 no. bed nursing home with entrance lobby, reception, activity rooms, kitchen, dining rooms, sitting rooms, day room, laundry and wash room, storage rooms and service room, parking spaces, Loading Bay and emergency services parking, landscape garden, connection to public services and all associated site works. This permission has now expired.

It is respectfully suggested that the site in question was zoned for community use in the Clare County Development Plan 2017-2023 having regard to the fact that the above permissions for the nursing home were still live. These permissions are now expired and therefore there is no reason as to why it is zoned for community use.

## 7.0 Statement of Suitability of Use

I, Andrew Hersey MIPI considers that the use of the proposed development site for residential purposes is highly appropriate in the context of the town and having regard to national and regional planning policy.. My client has approximately 3.98ha of land at this location. A residential development at this location will:

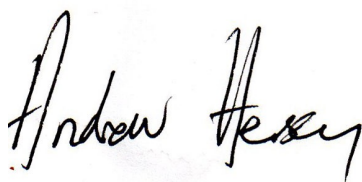
- (i) Have direct access onto an adjacent public road where there is access to a public water mains and access to the public sewer
- (ii) Be located within walking distance of all of the retail and community services that the town centre has to offer. It is a 20 minute commute to Ennis from the proposed development site



- (iii) My client is keen to develop these lands as soon as possible for housing which would alleviate the housing shortage in the town.
- (iv) My client would consider that the site would be suitable for the purposes for medium to high density housing and that in this respect, the lands could be zoned as *Residential*. in the adopted Clare County Development Plan 2023-2029.

With respect of the foregoing I, Andrew Hersey MIPI on behalf of my clients Rockfort Developments , urge the Planning Authority to zone these lands for residential purposes in the Clare County Development Plan 2023-2029

If you have any queries regarding the same please contact me at 087-6870917 or by email at [hersey.andrew@gmail.com](mailto:hersey.andrew@gmail.com).



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*SiteLayout of permission granted under Planning Reg. Ref P20-969*



