



Clare County
Development Plan
2023-2029

Draft Clare CDP 2023-2029 - Public Consultation Portal

Submitted By: Anonymous user

Submitted Time: March 28, 2022 2:37 PM

Name

Wiskin Property Development Ltd c/o KPMG Future Analytics

Address

[Redacted Address]

Email Address

[Redacted Email Address]

Please confirm your Email Address

[Redacted Email Address]

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

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Location Map



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Submission to Draft Clare County Development Plan 2023-2029

In Respect of Lands at Ashler, Tulla, Co. Clare.

On behalf of: Wiskin Property Development Ltd.

March 2022

Document review and approval

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Executive Summary

This submission to the Draft Clare County Development Plan 2023-2029 has been prepared by KPMG Future Analytics on behalf of Wiskin Property Development Ltd in respect of lands at Ashler, Tulla, Co. Clare.

Under the current Clare County Development Plan 2017-2023, the subject lands encompass two land use zonings as shown in Figure 2.1 below – ‘Low Density Residential’ which relates to the use of lands to accommodate a low-density pattern of residential development and ‘Community’ which involves the development of lands for community uses such as education, civic, health services, community halls etc. The *Draft Clare County Development Plan 2023-2029* proposes to alter the land use zonings pertaining to the subject lands to now encompass ‘Residential’, ‘Strategic Residential Reserve’, ‘Recreation’ and ‘Community’ uses as shown in Figure 2.2 below.

Under the Current Plan the residential portions of the lands are zoned ‘Low Density Residential’, this zoning allows for a low-density pattern of residential development, primarily detached family dwellings. As mentioned above, under the Draft Plan the residential portions of the lands are now proposed as ‘Residential’ and ‘Strategic Residential Reserve’. The ‘Residential’ zoning objective permits a wider density band to be delivered on such lands which signals the Authority’s recognition that the subject lands are prime for development and suitable for multi-unit schemes. In addition, residential zoned lands may also provide for a range of other uses particularly those that have potential to foster the development of new residential communities.

‘Strategic Residential Reserve’ are lands that are infill or contiguous sites or have planning history of residential use and can form part of the long-term sequential expansion of the settlement. These lands may be given consideration for development before the end of the plan period where the Planning Authority are satisfied that the development of zoned lands is progressing faster than expected and a shortage of available land may arise, or residential zoned land may not be delivered as expected and a shortage may arise during the plan period.

This change in zoning and the inclusion of the Strategic Reserve zoning objective has restricted our client’s ability to deliver much needed housing in Tulla and effectively fragmented the lands in such a way that the entire land bank would be undevelopable. The portion of the lands zoned R3 due to their topography are, on their own, not suitable or economically viable for development but could represent a viable option for landscaped public open space as part of a holistic redevelopment of the lands through the extension of the ‘Residential’ zoning objective further south in place of the SR zoned lands. In order for our client to deliver their ambition of a residential-led development complemented by community uses and mixed-use development, our client requires certainty from a zoning perspective that this will be achievable.

The purpose and objective of this submission is to demonstrate to CCC the merit of altering the residential zoning from the current *Clare County Development Plan 2017-2023* on our client’s lands which are now proposed to be Residential R3 and Strategic Residential Reserve SR2. It is also our client’s wish to extend the proposed community zoning to include the western and south western portion of the lands and to include a mixed-use zoning to the south eastern portion of the lands. Such amendments would facilitate the delivery of much needed community infrastructure and services to support a growing population and create employment generating uses that would help in reversing outward commuting patterns from the settlement.

Should the Authority be minded to accept this submission, it is also respectfully requested that the Tulla settlement boundary be extended to include the entirety of our client’s lands and ensure the above outcomes can be secured. This will allow for the delivery of a holistic integrated scheme and avoid a scenario whereby piece-meal disjointed development takes place owing to uncertainties created by development crossing settlement boundaries.

Given the size of the subject lands, their strategic positioning at the entrance to the settlement core and the various zoning objectives that they encompass, our client recognises the importance of undertaking a masterplan to ensure that future development proposals on the lands can be delivered in such a way that will support the sustainable growth of Tulla. Should the Authority be minded to accept the outcomes sought as part of this submission, our client would welcome the inclusion of a local specific objective requiring the submission of a masterplan to accompany planning applications for the redevelopment of the entire landbank. This will allow for an appropriately designed and plan led integrated development and would ensure that any development on these lands would be delivered in a sustainable manner.

As part of this submission an analysis of Tulla's socio-economic profile has been undertaken including the expected population growth, current and future private households together with a social infrastructure audit which justifies the outcomes sought under this submission. This analysis has concluded that Tulla's population has grown and is expected to continue to grow but a reduction in the provision of private housing has impacted the settlement's ability to deliver housing to match demand. The Social Infrastructure Audit identified that Tulla is relatively well served in terms of social infrastructure relative to its position in the Settlement Hierarchy. However, there is a shortfall in some services and facilities, and as Tulla further grows it is vital that community facilities and services are delivered in tandem with this growth. Our client has local ties to Tulla and therefore wants to give back to the community by delivering community and employment uses on these lands in tandem with a residential development.

1.0 Introduction

KPMG Future Analytics (KPMG FA) have been instructed by Wiskin Property Development Ltd to make this submission to Clare County Council (CCC) in respect of the *Draft Clare County Development Plan 2023-2029* (Draft Plan) and the zoning of approximately 12.5 ha of agricultural lands located at Ashler, Tulla, Co. Clare, as identified in Figure 1.1.



Figure 1.1: *Indicative extent of approximately 12.5 ha subject lands*

As indicated in Figure 1.1 above, the subject site is located to the south east of Tulla town centre and is strategically positioned to the south of Tulla town centre acting as an entrance point to the town from the south, the lands benefit from straddling two roads - the R352 to the south that provides a direct connection to Ennis and an access spine road to the west that provides a link to the Tulla settlement centre.

Although presently in agricultural use, the surrounding lands are characterised by residential development and are strategically positioned in close proximity to existing social infrastructure including a school, medical centre and recreational playground. The site further benefits from its contained and coherent landholding owned by a single party that offers certainty in terms of development intent for the lands and presents a viable opportunity to deliver an integrated plan led development response to the currently underutilised lands.

1.1 Proposed Land Use Zoning

This section of the submission clearly provides a visual representation of the proposed amendments to the Draft Plan sought in relation to land use zoning and the settlement boundary and how such amendments can be readily incorporated into the final Plan by the Planning Authority. Table 1.1 overleaf, sets out an overview of the changes proposed, with Section 2 of the submission providing more details on the amendments sought.

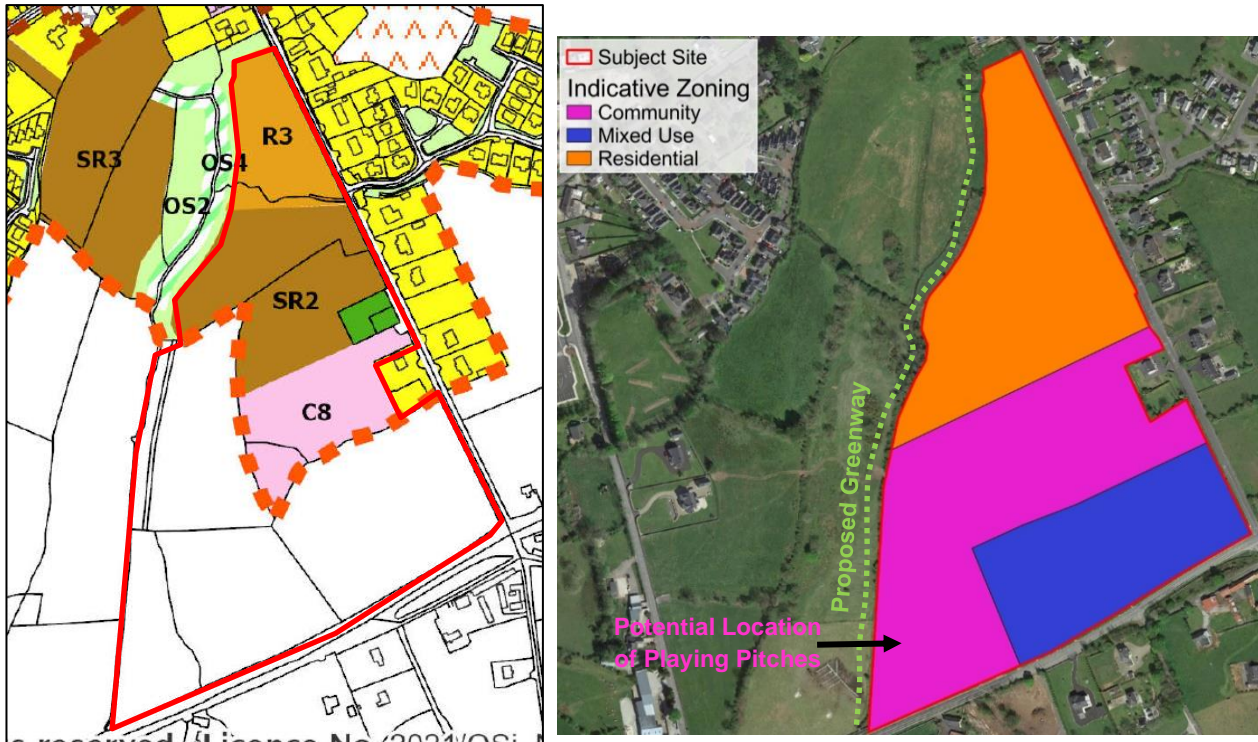


Figure 1.2: Draft Plan zoning VS Proposed Zoning

Table 1.1: Submission Proposal

Draft Plan	Proposal
Residential R3	Extend the R3 zoning to a more central location of the site and amalgamate the R3 and SR2 Zoning to Residential R3.
Strategic Residential Reserve SR2	Amalgamate the SR2 zoning with the R3 zoning to create a new portion of residential zoned lands and extend the zoning and settlement boundary to the western boundary of the subject lands.
Community C8	Extend the current Community C8 lands to the western boundary of the site and to the south western portion of the lands.
Recreation	Relocate the existing playground on the Community C8 lands.
N/A	Extend the settlement boundary along the south eastern portion of the site to encompass the entirety of the lands. Zone this portion of the lands as 'Mixed-use'.
N/A	Extend the settlement boundary to encompass the entirety of the subject lands.

2.0 Purpose of Submission

The purpose and objective of this submission is to demonstrate to CCC the merit of altering the residential zoning from the current *Clare County Development Plan 2017-2023* on our client's lands which are now proposed to be Residential R3 and Strategic Residential Reserve SR2. It is also our client's wish to extend the proposed community zoning to include the western boundary of the lands and to the south western portion of the site and to include a mixed-use zoning to the south eastern portion of the lands. The aforementioned alterations will necessitate the minor extension of the Tulla settlement boundary to avoid uncertainty created in situations where landholdings cross settlement boundaries.

2.1 Land Use Zoning

Under the current *Clare County Development Plan 2017-2023* (Figure 2.1) the subject lands have two different zoning objectives. These are 'Low Density Residential' and 'Community'. Low Density Residential refers to the use of lands to accommodate a low-density residential development, primarily detached family dwellings. While Community zoning relates to the development of lands for community uses including the use of lands for community, civic, health services, public or educational uses including the provision of schools, community halls, healthcare facilities any other facility that is intended to provide some form of community services.

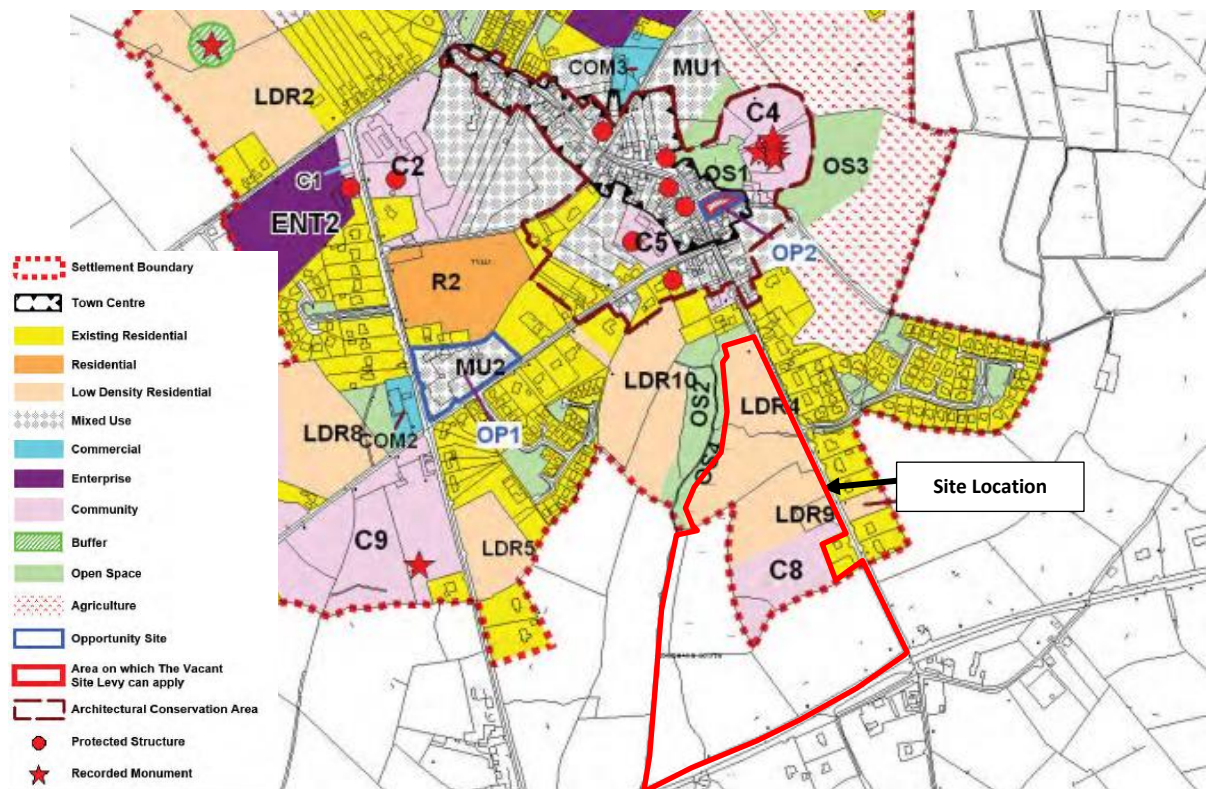


Figure 2.1 Current Zoning in the Clare County Development Plan 2017-2023

Under the *Draft Clare County Development Plan 2023-2029* (Figure 2.2) the subject lands encompass several land use zoning objectives including 'Residential', 'Strategic Residential Reserve', 'Recreation' and 'Community'. Residential zoned lands have been identified for the use of land for domestic dwellings, these lands may also provide for a range of other uses particularly those that have the potential to foster the development of new residential communities e.g. schools, creches and open space. Strategic Residential Reserve zoned lands are sites which comprise infill or contiguous sites or have planning history of residential use and can form part of the long-term sequential expansion of the

settlement where considered appropriate. These lands can be developed prior to 2029 where the Planning Authority is satisfied that the development of zoned lands is progressing faster than expected and a shortage of available lands may arise, or residential land may not be delivered as expected and a shortage may arise during the plan period.

The Plan identifies Community zoned lands as lands for community use including community, civic, health services, public or educational uses including the provision of schools, community halls, healthcare facilities and any other facility that is intended to provide some form of community service. A small portion of the lands under the Draft Plan are zoned 'Recreation'. Recreation zoned lands are defined as land for the provision of sports grounds/playing pitches, golf courses, tennis courts and other active indoor and outdoor recreational facilities that contribute to meeting the leisure, recreation and amenity needs of the immediate community and/or the wider area.

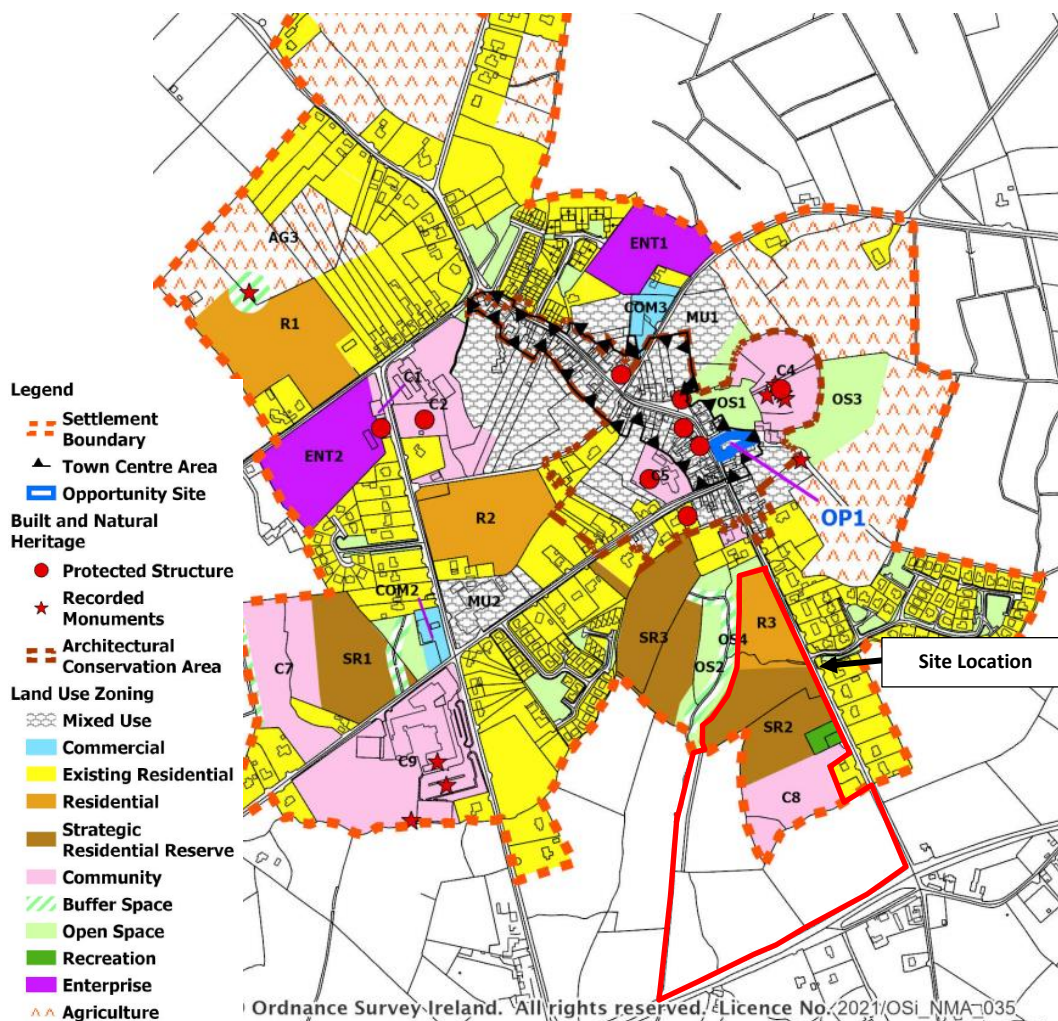


Figure 2.2 Zoning proposed by the Draft Clare County Development Plan 2023-2029

The purpose of this submission is to illustrate how the proposed zoning alterations will facilitate the implementation of the plan led redevelopment of the subject lands to deliver much needed residential accommodation in tandem with associated community and commercial uses. Such an integrated approach will contribute to the sustainable expansion of an established residential community together with the provision of necessary supporting uses to consolidate Tulla's position within the settlement hierarchy of the County. The revised zoning objectives across the subject lands, as proposed by the Draft Plan, signal the Authority's recognition that the lands represent a viable and tangible opportunity

to sustainably consolidate Tulla's urban core and ensure that the delivery of much needed housing takes place in tandem with the implementation of associated supporting uses and infrastructure.

The north western part of the subject lands currently zoned R3 are not entirely practical or economically viable for development purposes owing to the topographical constraints of the lands and the presence of a steep incline across this portion of the site. Therefore, it is submitted that the 'Residential R3' lands and the 'Strategic Residential Reserve SR2' lands should be amalgamated and zoned as 'Residential'. It is also proposed to extend the community zoning to include the western boundary of the lands and the south western portion of the site, this will enable the delivery of an appropriate and sustainable quantum of community uses to complement existing provision in the locality and cater to additional demand generated by future development in the Tulla region.

The inclusion of a mixed-use zoning to the south eastern portion of the lands as proposed would facilitate the opportunity to deliver employment generating uses that would support population growth and reverse the historic trend of outward commuting from Tulla. A crucial facet of sustainability relates to economic development and it is therefore considered prudent that an appropriate quantum of economic based development is targeted towards Tulla to safeguard its positioning within the settlement hierarchy. Our client has a viable vision to incorporate a garden centre on this portion of the lands together with an element of other employment uses that would represent a welcome addition to the existing service offering in Tulla and other key employment providers such as Beckman Coulter and McGraths Quarries. The lands also represent an opportunity to deliver a form of tourist accommodation to meet demand for such accommodation types owing to the growth of the tourism sector in East Clare.

Should the Authority be minded to approve the amendments to the zoning objectives for the subject lands, the minor extension of the settlement boundary will also be required for completeness. This will allow for the delivery of a holistic integrated scheme and avoid a scenario whereby piece-meal disjointed development takes place owing to uncertainties created by development crossing settlement boundaries. Figure 2.3 below provides a visual representation of how the proposed zoning alterations could be readily implemented and offers an indicative location of the future playing pitches that would increase the offering of a community use that is presently in short supply in Tulla.

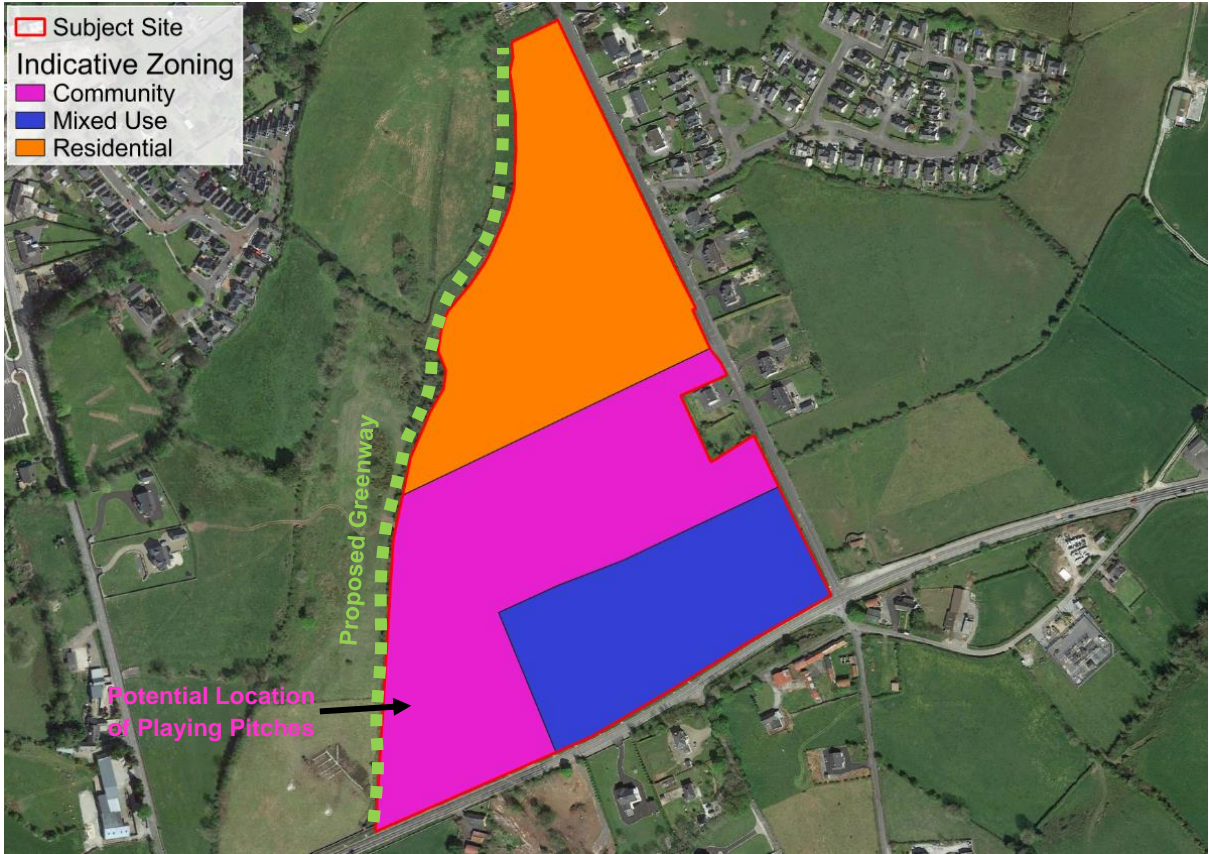


Figure 2.3 Indicative Proposed Land Use Zoning

3.0 Site Context

The subject site, comprising c. 12.5 ha is a greenfield site irregular in shape and is located approximately c.350m (5-minute walk) south of Main Street Tulla (town centre) via existing pedestrian footpath located on the existing 'Furhee' road along the eastern boundary of the lands. Located on Main Street are several services and facilities including SuperValu, the Tulla Courthouse, cafes and restaurants etc. The subject lands are located c.700m (9-minute walk) east of St. Joseph's Secondary School. The lands are bounded to north by Tulla Garda Station, agricultural green field lands to the west, the existing Old Forge residential area and a number of one-off dwellings to the east and by the R352 to the south which provides a direct connection to Ennis. The subject site is located c. 260m (4-minute walk) from the Tulla bus stop which is served by 348 and 346 bus routes. The settlement of Tulla is also served by EC1b Scariff – Ennis route of the Clare Bus service.



Figure 3.1 Indicative location of the subject site (in red) within Tulla. Source KPMG FA, 2022.

The subject lands are currently a greenfield land and are undeveloped and underutilised. The topography of the lands is for the most part flat however, the north-western portion of the R3 zoned lands experience a steep incline and therefore is not considered to be appropriate or economically viable for residential development. Whilst the Authority's recognition that this area of land be developed for residential use is welcomed by our client, it is considered that the residential zoning extent southwards to facilitate the creation of an area of public open space to the north with an appropriate residential streetscape thereby creating a strong urban edge to the road. The inclusion of landscaped public open space as part of a residential led development will represent a significant planning gain for the area and a welcome addition for the Tulla settlement.

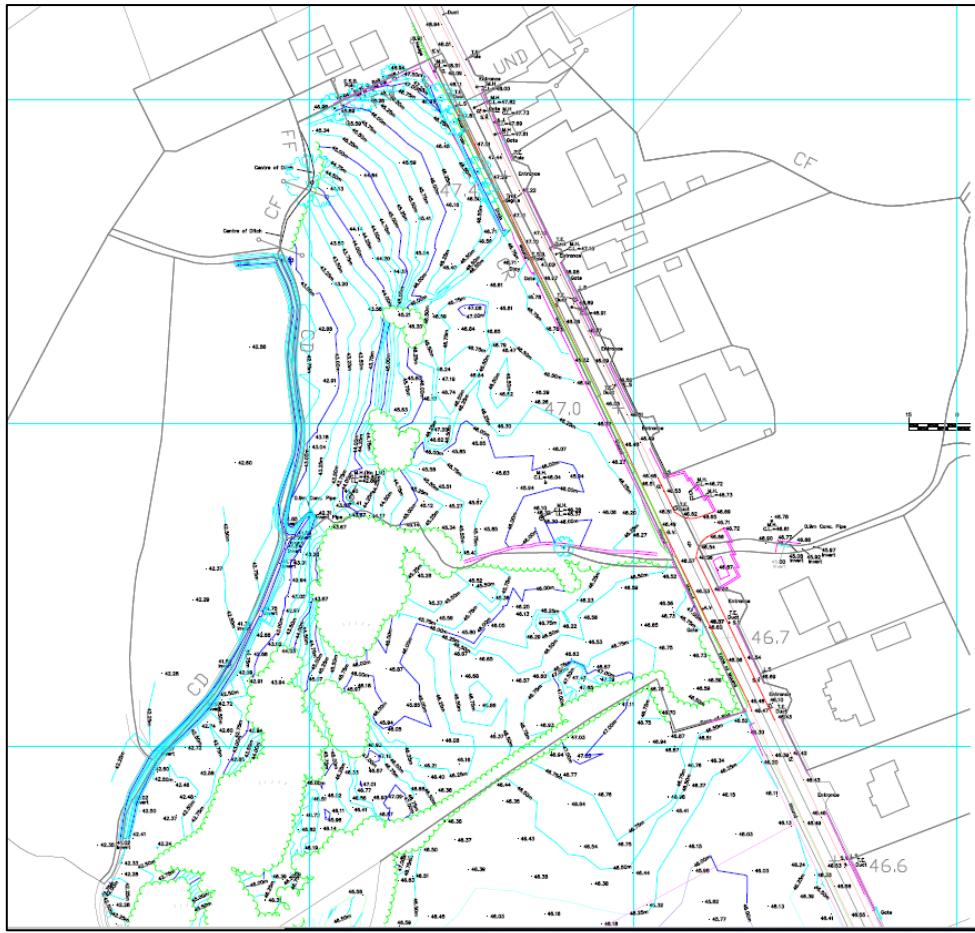


Figure 3.2: Topographical Survey of northern portion of subject lands

In accordance with the Draft Plan, any future development on our client's lands (R3) requires the development of a riverside amenity area (OS4) to be included in the design and should be delivered by the developer. The Draft Plan also requires that houses constructed on these R3 lands must address, but not necessarily in parallel with, both the public road and open space at OS4. Our client, if provided the appropriate opportunity to develop these lands will deliver as part of the residential-led development, a greenway for pedestrians and cyclists along OS4 to deliver better and more sustainable linkages to the town centre from the subject lands.

The provision of this greenway along OS4 is further evidence that the extension of the settlement boundary will have additional benefits for the region. The greenway would be provided along the entire western boundary of the subject lands providing direct linkages and connections to the town centre. Furthermore, this greenway would provide ample opportunity as an amenity area for Tulla and would deliver a landscaped area of high quality with pedestrian and cycle routes and the potential of outdoor gym equipment. This would provide an outdoor amenity area for all ages.

3.1 Planning History

A review of the planning history on Clare County Council's website has shown a history of residential planning history sought. Table 3.1 below sets out the planning history on the subject site.

**Submission to Clare County Development Plan 2023-2029
On behalf of Wiskin Property Development Ltd**

P.A Ref. No.	Applicant	Development Description	Decision
04/1235	Mick Kehoe	to construct 89 no. dwelling houses, connect to public foul sewer, connect to public water supply, discharge surface water to surface water drain, connect to public services (telephone and electricity) and carry out all ancillary site works	Refused 18/09/2005 Refused due to lack of waste water capacity and design issues
06/2200	John P. O'Connor	Construct 76 no. dwelling houses and creche, connect to public foul sewer, connect to public water supply, discharge surface water to surface water drain, connect to public services (telephone & electricity) and carry out all ancillary site works	Withdrawn. Wastewater capacity still an issue at the time
07/3015	J.P. O'Connor Construction	Permission to develop lands, namely construct 57 no. dwelling houses and creche, connect to public foul sewer, connect to public water supply, discharge surface water to surface water drain, connect to public services (telephone and electricity) and carry out all ancillary site works.	Refused 01/10/2008 Refused due to poor layout and design.
07/2630	Board of Management St. Josephs Secondary School	Construct new access road, including footpaths and cycle lanes to service playing pitches, along with road side protective nettings and flood lighting to pitches	Conditional 17/02/2008

4.0 Socio-Economic Profile & Social Infrastructure Audit

A socio-economic profile of the area surrounding the subject site has been prepared to provide an evidence base in support of key arguments for the proposed rezoning of this site. This section of the report presents the findings of this profile with the specific focus on demand for housing. An audit of existing social infrastructure has been undertaken to demonstrate that Tulla is relatively well served by existing provision to accommodate demand generated by future housing.

The Audit will also examine and identify any gaps in existing social infrastructure provision that could be delivered on the subject lands as part of a residential integrated led development should the Authority be minded to accept the outcomes sought as part of this submission. Such uses would also contribute to employment creation and assist in revert outward commuting trends by providing opportunities for current and future residents to work in their locality.

4.1 Study Area

The study area has been defined using 8 no. Small Areas within a 2km radius of Tulla. These are considered to provide the most accurate representation of the Tulla Settlement as they include the vast majority of residential development within Tulla across their collective boundaries.

This report considered the socio-economic profile status of the surrounding area in order to assess the suitability of changing the land use zoning of the subject site to the before mentioned.

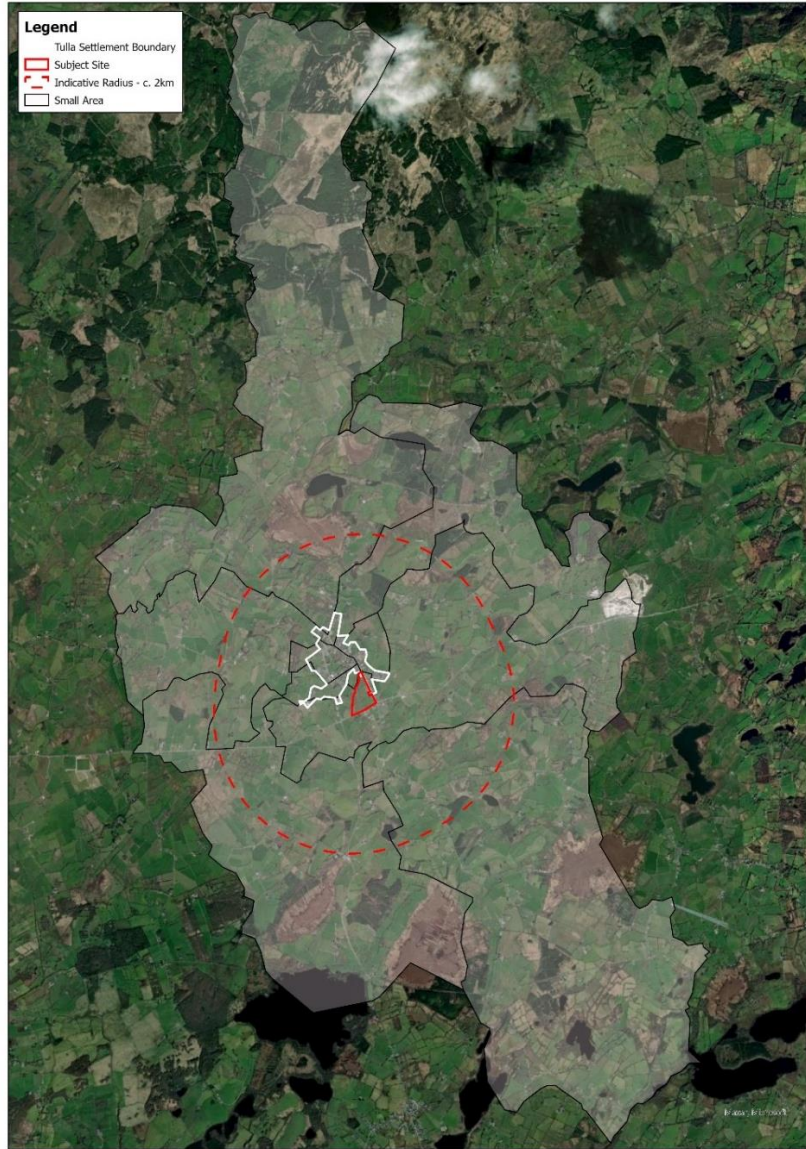


Figure 4.1: Study Area

4.2 Demand for Housing

4.2.1 Population Change

The population of the study area has grown by 2.1% over a 5 year period (2011 – 2016) which is significantly above the County growth rate of 1.4%.

Table 4.1: Population Change

	2011	2016	Pop. Change (%)
Study Area	1,715	1,751	2.1%
Clare County	117,196	118,817	1.4%

4.2.2 Current Housing Supply

As shown in Table 4.2, the number of private households has decreased by 11 no. private households over the last 5 years. In 2016, the average household size in the Study Area was 2.75. As can be seen from Table 4.2 below, Tulla has experienced a reduction in the total number of private households. This illustrates that Tulla has experienced a period of decline in terms of housing production. This lack of

development could have devastating impacts for the future growth of Tulla and is further evidence that that existing residential zoned lands have remained idle over the last plan periods and have not come forward for development. Therefore, it is vitally important that the subject lands which are development ready and within single party ownership who is keen to commence development in the short to medium term, are not precluded from redevelopment under this Plan.

Table 4.2: Number of Private Households

	2011	2016
Study Area	652	641

As illustrated in Table 4.3, in terms of occupancy, the number of private households that are owner occupied with a mortgage experienced a decrease in the 5 year period of 2011-2016. The number of private households that are owner occupied without a mortgage experienced an increase during this period. The number of private households renting either from a Local Authority or a Voluntary Body decreased during this period.

Table 4.3: Permanent private households by type of occupancy type of occupancy

	2011	2016
Owner occupied with mortgage	285	265
Owner occupied no mortgage	246	248
Rented from Private Landlord	55	72
Rented from a Local Authority	21	19
Rented from a Voluntary Body	14	13
Occupied free of rent	19	11
Not Stated	7	12
Total	647	640

In respect of the types of accommodation within the Study Area, the largest group in 2011 and 2016 were those residing in houses/bungalows. Notably, between 2011-2016, there was a decrease of persons residing in caravan/mobile home accommodation (- 0.6%) and an increase of 0.1% of persons residing in houses/bungalows. However, most notably there was a decrease in the number of private houses/bungalows and private accommodation in general.

Table 4.4: Private Households by type of accommodation

Private Households by Type of Accommodation	No. Households 2011	(%)	No. Households 2016	(%)
House/Bungalow	637	97.7%	627	97.8%
Flat/Apartment	2	0.3%	2	0.3%
Bed-sit	-	-	-	-
Caravan/Mobile Home	5	0.8%	1	0.2%
Not State	8	1.2%	11	1.7%
Total	652	100%	641	100%

4.2.3 Projected Population Change

According to the NPF Implementation Road Map (2018), Clare is projected to experience a population uplift of 10,500 – 12,500 persons between 2016-2026 and an uplift of 15,000 – 18,000 persons between 2016-2031.

In respect of Tulla, the Core Strategy provides that the population allocation between the period 2023-2029 is 81 persons. The Core Strategy has allocated 42 no. housing units to accommodate this growth. Recent trends have seen Tulla begin a period of revitalisation and the Authority's clear recognition that Tulla has the potential to accommodate such growth reaffirms this position. It is therefore considered that additional lands in strategic locations such as the subject site should be earmarked to

accommodate housing to meet this demand together with the delivery of associated supporting services and facilities.

4.2.4 Housing Need According to Clare Housing Strategy

According to the Clare County Housing Need Demand Assessment¹, the Housing Supply Target for County Clare in the Clare County Development Plan 2023 2029 will plan for 4,500 new households over the plan period. The HNDA analysis indicates that over the (seven) years 2023-2029, approximately 19% of new households will require social housing and approximately 5% will require affordable housing. A further 51% of households will be able to purchase a home, while approximately 25% will fall into the private rented sector. During the lifetime of this Plan, Tulla has been allocated 42 no. residential units.

4.2.5 Future Housing Supply

A review of the planning pipeline was undertaken in Tulla. In terms of pipeline permissions, there is a total of 122 no. units. Of these units, a total of 25 no. units have commenced and 25 no. units have been completed. Those units would have formed part of the current Plan's housing targets which should be transposed into the Draft Plan and added to the projected units identified for the settlement.

Table 4.5: Planning Pipeline

Reg. Ref.	No. Units Permitted	Status
19/765	36 no. units	Not Commenced
19/8017	25 no. units	Completed
19/776	17 no. units	Commenced
20/969	36 no. units	Not Commenced
20/908	8 no. units	Commenced

¹ Clare Housing Strategy – Volume 8 Draft Clare County Development Plan 2023-2029



Figure 4.2: Planning Pipeline

Assuming that all of the units in the planning pipeline, which were granted under over the period of current plan and therefore do not affect the proposed targets identified in the Draft Plan, came forward, they would have the potential to generate a population of 336 persons (calculated using no. units 122, average household size in the Study Area, 2.75). This growth aligns with the Planning Authority's aspirations for Tulla to further grow, and if Tulla is to reach its full potential the settlement will require further housing, services, community facilities and employment opportunities. The rezoning of these lands will provide these requirements to allow Tulla to grow in a sustainable manner.

4.2.6 Estimated Future Housing Profile

A projection of the future housing profile of the Study Area was undertaken by KPMG Future Analytics. According to this review, in respect of housing composition, the number of 1 person households is to decrease by 3.1% (Figure 4.3). The largest group in terms of household composition is 2 person households with 4 person households as the second largest.

Forecast Household Composition 2023-2028

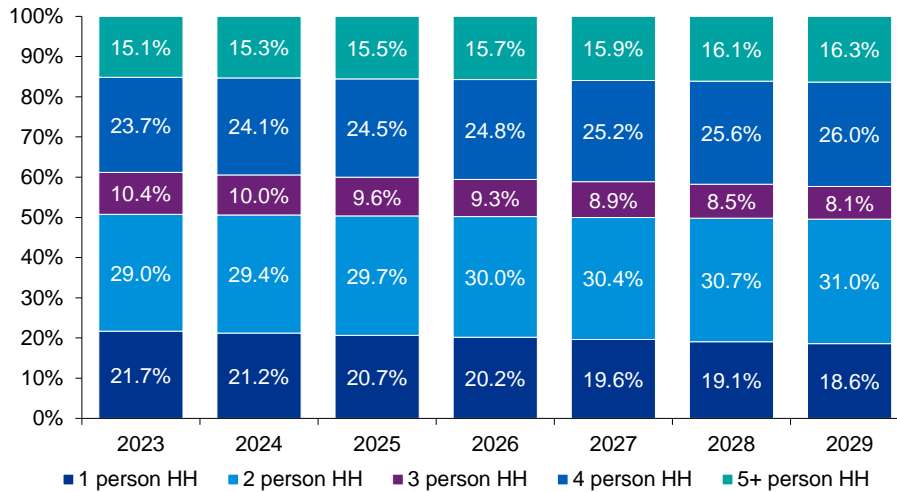


Figure 4.3: Household Composition (Source: KPMG FA)

In regard to dwelling type, the percentage of households residing in houses is projected to remain the same up to 2029.

Table 4.6: Forecasted Dwelling Type

Forecasted Composition	2023	2024	2025	2026	2027	2028	2029
House/Bungalow	99.7%	99.7%	99.7%	99.7%	99.7%	99.7%	99.7%
Flat/Apartment	0.3%	0.3%	0.3%	0.3%	0.3%	0.3%	0.3%

4.2.7 Social Infrastructure to Support Future Housing

As part of this report, a high-level review of the existing social infrastructure in the area has been undertaken in order to demonstrate the suitability of the site for residential, community and mixed-use zoning. A 2km buffer around the subject site was also examined. In total 23 no. facilities were identified. A breakdown of each social infrastructure category is provided below.

Education and Childcare

As illustrated on Figure 4.4 below, there are a total of 4 no. education and childcare facilities in the area. These include 1 no. primary school, 1 no. secondary school and 2 no. childcare facilities.

A full list of these facilities is provided in Appendix A.

Open Space

As illustrated in Figure 4.4 below, there are a total of 5 no. open space facilities identified within the Study Area. These include 1 no. parks, 1 no. playground, 1 no. running track, and 2 no. sports centres.

A full list of these facilities is provided in Appendix A.

Community and Civic Services

As illustrated in Figure 4.4 below, a total of 7 no. Community and Civic services were identified within the Study Area. These include 1 no. garda station, 1 no. town hall, 1 no. welfare office, 1 no. cultural centre, 1 no. library, 1 no. bank and 1 no. post office.

A full list of these facilities is provided in Appendix A.

Healthcare Facilities

As illustrated in Figure 4.4 below, a total of 2 no. healthcare facilities were identified within the 2km radius. These include 1 no. Health Clinic and 1 no. pharmacy.

A full list of these facilities is provided in Appendix A.

Retail

As illustrated in Figure 4.4 below, a total of 2 no. retail services were identified within the Study Area. These include 1 no. convenience and 1 no. supermarket.

A full list of these facilities is provided in Appendix A.

Religious Institutions and Burial Sites

As illustrated in Figure 4.4 below, a total of 3 no. religious facilities and burial sites within the Study Area. These include 1 no. place of worship, 1 no. cemetery and 1 no. funeral home.

A full list of these facilities is provided in Appendix A.

SIA Conclusion

As demonstrated above, the settlement of Tulla is served well in respect to the town's population and its place in the settlement hierarchy, but future facilities would need to be delivered as the town's population grows over time. As can be seen from Figure 4.4 overleaf, the subject lands are located in close proximity to a number of services, further indicating that the subject site is a prime location for a residential-led development. The subject lands represent a logical tie to the existing community facilities of Tulla due to their close proximity to such services. Therefore, future residential-led development of the site can create a synergy between the existing provision and can maintain the critical mass required to support these services but can also expand on these existing facilities to complement them.

Furthermore, the Social Infrastructure Audit has identified there is a gap in terms of the provision of facilities such as playing pitches in this area, a garden centre facility, and light industrial uses and other employment generating uses. There is also a shortage of tourism accommodation in the East Clare area between Ennis and Killaloe. This submission is grounded in evidence-based analysis of the area which has informed the proposed zoning alterations to the Draft Plan that would result in the improvement of the Tulla settlement ensuring its status within the settlement hierarchy is safeguarded.

Those facilities and services which Tulla are currently experiencing a shortfall in, could be delivered on the community and mixed-use zoned lands. At this early stage our client proposes to deliver playing pitches and relocate the existing playground on the proposed community lands. Our client has local ties to Tulla and wants to see Tulla thrive and create an integrated plan led proposal for the lands with sufficient planning gain that would enhance the area and be a welcome addition to the community. The rezoning of these lands to include a mixed-use objective could help provide additional uses and employment opportunities which Tulla is currently lacking.

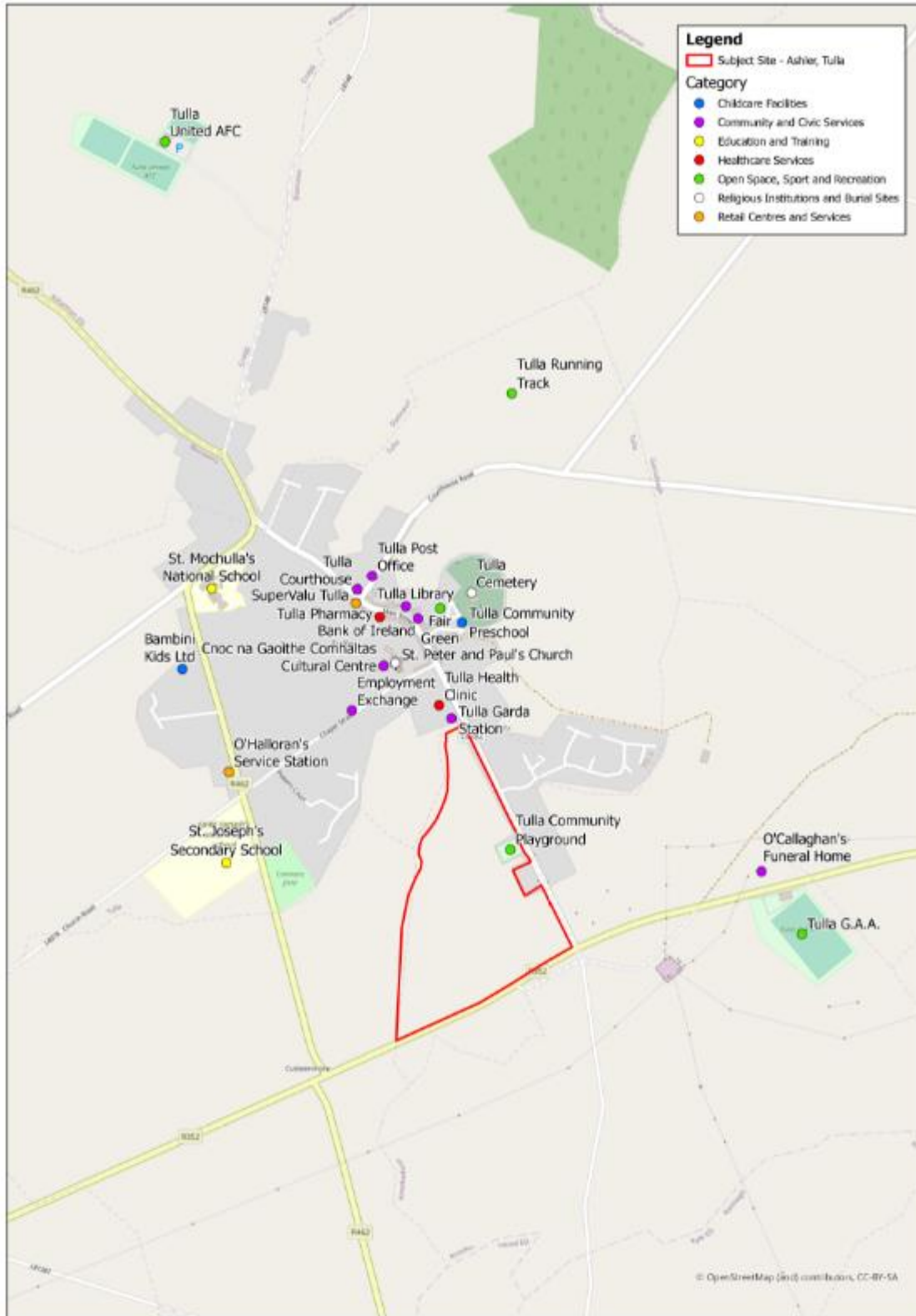


Figure 4.4: Social Infrastructure Audit

4.2.8 Conclusion

This socio-economic profile and social infrastructure audit demonstrated the following:

- The Study Area has experienced a population growth over a 5 year period.
- Population is projected to increase by 81 person within the life of the Draft Plan in order to meet the requirements of the Core Strategy. Currently, in the planning pipeline 122 no. units have been granted planning permission. These units were granted planning permission under the current plan and therefore do not impact the Core Strategy figures of the Draft Plan. However, if these 122 no. units come forward Tulla could also see an increase of 336 persons. Therefore, this growth will align with the Planning Authority's vision of Tulla growing and reaching it's potential and this growth will require further services, community facilities and employment opportunities. The rezoning of these lands to mixed-use will provide these requirements to allow Tulla to grow in a sustainable manner.
- The review of the demographic profile has demonstrated that there is a current need for housing which is compounded by an increase in population, a loss of residential units over the period 2011-2016 and a projected increase in population that is expected over the lifetime of the development plan. The subject lands represent an ideal opportunity to accommodate this projected growth whilst simultaneously creating a critical mass required to sustain existing and proposed services and commercial based uses in the locality.
- The settlement of Tulla is served well in respect to the town's population and its place in the settlement hierarchy, but there is a shortfall in some facilities and employment opportunities and future facilities would need to be delivered as the town's population grows overtime.

5.0 Residential Land Requirement

The Draft Plan identifies greenfield lands will be identified to provide new housing and associated facilities. This approach aims to regenerate and ensure vibrancy of the Town’s population profile. The following section will discuss the requirement for the residential zoned land in Tulla and the alignment with the Core Strategy.

5.1 Tulla Development – Growth and Potential

5.1.1 Core Strategy and Settlement Hierarchy

Tulla is identified as a ‘Small Town’ under the Settlement Hierarchy of the Draft Plan. The Draft Plan defines these ‘Small Towns’ as of fundamental importance as employment and tourist centres for the provision of services and facilities for their resident populations and their rural hinterlands. The strategy for these settlements is to ensure that their existing roles are maintained and further strengthened through measures such as adequate zoning of lands for development, supporting the concept of settlement networks, seeking investment to regenerate and rejuvenate these settlements, supporting and working with the relevant bodies towards the development of the required ancillary infrastructure, and the adoption of a facilitatory approach towards appropriately-scaled and designed urban development.

While Tulla is categorised as a Small Town it has always functioned as a hub by virtue of the facilities available there. That is further evidenced by the hinterland that it draws economic support from. The student population at St Joseph’s Secondary School provides further evidence that Tulla is not only serving its immediate parish but also to villages such as Kilkishen, O’Callaghans Mills, Feakle, Broadford, which look to Tulla as their local town.



Figure 5.1: Settlement Hierarchy

The Draft Plan states that the expansion of these towns should be sympathetic to the surrounding areas and should adopt the sequential centre out approach to development. The Plan promotes compact growth and regeneration of underutilised sites, such as the subject lands as these allow for a shift to more sustainable transport modes and the ten-minute town centre concept. It is national and regional policy to support the ten-minute town centre concept with the Southern Regional Assembly preparing a '10 Minute Town' concept report. This report seeks to have all community facilities and services accessible within a 10-minute walk or cycle from homes or are accessible by public transport services connecting people to larger scaled settlements. The subject site is within walking distance from Main Street and host of shops and services. The most southern point of the subject site is closer to the village centre than the other settlement boundaries such as the most northern point or western point. The subject site is also easily accessible with connections to the local 'Furhee' road to the eastern boundary and R352 which is a direct access route (approx. 15-minute drive) to the Key Town of Ennis. Therefore, the subject site should be considered a central location primed for residential-led development.

“Development Plan Objective: Small Towns CDP 4.6 It is an objective of Clare County Council:

a) To ensure that the small towns throughout the County continue to act as important local service centres that maintain sustainable communities, help to ensure a good quality environment, provide public transport to the main centres, and provide a high quality of life for those who live in the vicinity;

b) To work with the relevant bodies and to seek investment for the timely and sustainable delivery of holistic infrastructure, to enhance the levels of amenity and design quality and to regenerate and rejuvenate the Small Towns throughout the County;

c) To ensure that future growth is incremental and balanced in nature, and is relative and appropriate to the scale, size and character of the small towns and to seek to achieve centre out compact growth;

d) To seek investment in the sustainable development of a “New Homes in Small Towns and Villages” initiative in the County and the provision of services and serviced sites to create “build your own home” opportunities within the existing footprint of small towns; and

e) To monitor the cumulative effect of grants of planning permission on available wastewater capacity where connection to a public wastewater treatment plant is included as part of a development proposal.”

As Tulla is defined as a Small Town, Tulla has been allocated a population growth of 81 persons and 42 no. residential units to accommodate this population growth. The Core Strategy requires 2.29 ha of land to facilitate these units, however the Core Strategy has zoned 5.77 ha of land for residential. This indicates that CCC are aware that the residentially zoned land may not come forward for development.

Table 5.1: Core Strategy Table (Source: Draft Clare County Development Plan 2023-2029)

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
	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

It is clear that local and national planning policy supports the growth of small towns. The subject lands are better positioned than existing zoned residential lands that have been consistently inactive to deliver the housing needed to accommodate projected growth for the area whilst simultaneously delivering supporting community-based services and employment generating uses. This submission fully aligns with the strategy and vision for Tulla and the expectation that Tulla has the potential to accommodate additional growth than may have previously been envisaged.

Tulla has started to experience a period of growth since 2018 with development at Cannon's Field and the site previously owned by St. Joseph's secondary school. It is expected that due to Tulla's location and close proximity to Ennis, the Key Town of Clare, that Tulla will continue to grow and may even grow at a more rapid rate than the Core Strategy above has estimated. Therefore, it would not be appropriate to only provide such a small amount of land zoned for residential development. Such a low amount of residentially zoned land within the ownership of a small few may result in periods of inactivity and stagnation as has been the case over the last Plan period. This could cause housing prices to increase at an unaffordable rate and risk stunting Tulla's growth and its ability to meet housing targets as set out in the Core Strategy.

Currently our client's lands have c. 1.03 ha zoned Residential (R3) and c. 2.1 ha zoned Strategic Residential Reserve (SR2). Our client is proposing to extend the R3 zoning and amalgamate this zoning with the SR2 zoned lands. Therefore, the area of lands zoned Residential will only increase by 0.77 ha. This will deliver a potential net (discounting 20% of gross area for public open space and roads etc) development yield of 56 no. of residential units (3.12 ha x 18 uph). Tulla is located within a strategic location and is only a c. 15-minute drive from Ennis, the Key Town for Clare. It is also respectfully submitted that the density bands permissible under residential zoned lands enable the Authority to retain sufficient comfort and control regarding the intensity of future development proposals at planning application stage.

5.2 Extent of Residential Zoned Lands – Draft Plan

A total of 5.77 ha is zoned for residential development in the Draft Plan, which 2.29 ha of land stated will be required to meet the Core Strategy zoned land target of an additional 81 no. people. If our rezoning request is accepted, a total of c.7.87 ha of land will be zoned residential, which will provide more opportunity to deliver much needed housing in Tulla by only mildly increasing the Core Strategy figures for Tulla.

5.2.1 Clare County Council Serviced Land Assessment (SLA)

A Serviced Land Assessment was undertaken by Clare County Council and is included in the Draft Plan. A total of 3 no. sites have been identified for 'Residential' development and 3 no. sites were identified for 'Strategic Residential Reserve' development within Tulla in this Draft Plan. This equates to 6 no. sites in total. All sites identified were also zoned as a residential zoning in the current plan. Table 5.2 below provides a review of the sites, noting their current and draft zoning, and their current status.

Table 5.2: Serviced Land Assessment Sites

Draft Plan Site Ref	Site Areas*	Draft Zoning	Current Zoning	Planning Pipelines	Status
R1	2.61	Residential	LDR2	Ref. 19/765	<i>No visible dev activity</i>
R2	2.12	Residential	R2	No extant applications	<i>No visible dev activity</i>
R3	1.03	Residential	LDR4	No extant applications	<i>No visible dev activity</i>
SR1	1.82	Strategic Residential Reserve	LDR8	Ref. 20/969	<i>No visible dev activity</i>
SR2	2.1	Strategic Residential Reserve	LDR9	No extant applications	<i>No visible dev activity</i>
SR3	2.42	Strategic Residential Reserve	LDR10	No extant applications	<i>No visible dev activity</i>
Total	12.16				

*Note SR site areas estimated.

As can be seen from Table 5.2 above, under the current Plan those 6 no. sites were zoned for residential or low-density residential development. Under the Draft Plan, these 6 no. sites are now zoned residential or strategic residential reserve. From these sites, planning permission has only been sought on two sites. There has been a historic trend of minimal development under the current plan in Tulla and if this current trend of inactivity continues into the new Plan, the Plan will fail to deliver its population growth and housing targets for Tulla. It is therefore vitally important that lands such as the subject site are zoned appropriately to bring forward much needed housing and complementing facilities and services for development, especially with a landowner who fully intends on delivering in the short to medium future, if provided the appropriate opportunity.



Figure 5.2: Serviced Land Assessment Sites shown with the subject site outlined in red

5.3 Suitability of Identified Sites for Future Housing Delivery

In Appendix 1 SLA, of Volume 3c Killaloe Municipal District Settlement Plans, the sites that have been identified for future housing delivery were assessed against the following headings: Footpath, Water Supply, Wastewater, Compact Growth, Public Transport, Co-Ordinated Development.

As noted in Table 5.2 above, the 6 no. sites in the SLA equate to 12.16 ha² in total. KPMG FA have carried out a desktop review of the status of each of these sites. Of the total 6 no. sites zoned for

² SR site areas estimated.

residential/ strategic residential reserve development in the current plan, two of these sites have planning permission but none of these sites shows visible development activity. If both developments are fully constructed, they will have the potential to deliver 72 no. units. However, this leaves a total of 7.73 ha of residential zoned land that has seen no activity since the commencement of the current plan. The proposal as outlined in this submission presents a credible and realistic opportunity to directly respond to this concern.

5.4 Comparison of Subject Site to Remaining Zoned Lands

While the SLA has identified sites deemed to be suitable for residential development, it is considered that based on their status since the commencement of the current plan, some of these sites are unlikely to be forthcoming for development in the short to medium term, with our client’s lands as the exception.

In comparison, the subject site benefits from having residential zoning under the current plan and under the Draft Plan a portion zoned ‘Residential’ and another zoned ‘Strategic Residential Reserve’. The zoning amendments to the Draft Plan as proposed under this submission will expand upon the permissible land uses across the site thereby facilitating the implementation of a plan led response to underutilised lands. The inclusion of supporting community, commercial uses are necessary to create a sustainable residential community that can avail of future employment opportunities in Tulla and the wider area. The proposed zoning adjustments and the associated extension of the settlement boundary have been informed by existing site constraints and the strategic position of the lands within an established residential setting at the southern entrance point to the town centre. Furthermore, the lands benefit from its contained and coherent landholding owned by a single-party and is ready to come forward for development. On this basis, it is considered that the portion of land zoned ‘Strategic Residential Reserve’ should not be prejudiced from coming forward in the near term.

Table 5.3 below assesses the subject site against the criteria used in the Serviced Land Assessment. Responses are indicated based on the results for the portion of lands zoned R3.

Table 5.3: Subject Site Assessed Against the SLA Criteria

Area (ha)	Roads	Footpath	Water Supply	Wastewater	Compact Growth	Public Transport	Co-ordinated Development
3.13	1	2	1	1	✓	✓	✓

This assessment indicates that the subject site is arguably more suitable than the proposed sites. The 5 no. of the 6 no. sites that were originally identified via the current development plan, that show no signs of coming forward in the short to medium term were presented with the same opportunity to deliver housing and have not. The subject site shares many of the characteristics of these sites, as demonstrated in Table 5.3 and is in a position to deliver housing in the short to medium term. On this basis, it is our respectful submission that the portion zoned SR on the subject site should be zoned as residential. Our client intends to deliver a residential-led development complemented by community uses such as playing pitches, a greenway to increase connectivity to and from the town centre and provide mixed-use services such as a garden centre and warehousing.

Our client also believes that the site has potential to deliver tourist accommodation on site as Tulla is a gateway to East Clare tourism and there is a shortage of tourist accommodation in East Clare. However, in order to do this our client needs certainty that this vision can in fact be delivered and the necessary zoning must be put in place. It should be noted that although the subject the lands did not come forward for planning under the current plan, our client has only recently purchased these lands and fully intends to bring these lands forward for development, if given the appropriate opportunity to realise their vision for the lands.

6.0 Justification of Rezoning and Extension of Settlement Boundary

This section of the submission will set out the justification for the rezoning of the subject lands and the extension of the settlement boundary.

6.1 Proposed Use Zoning

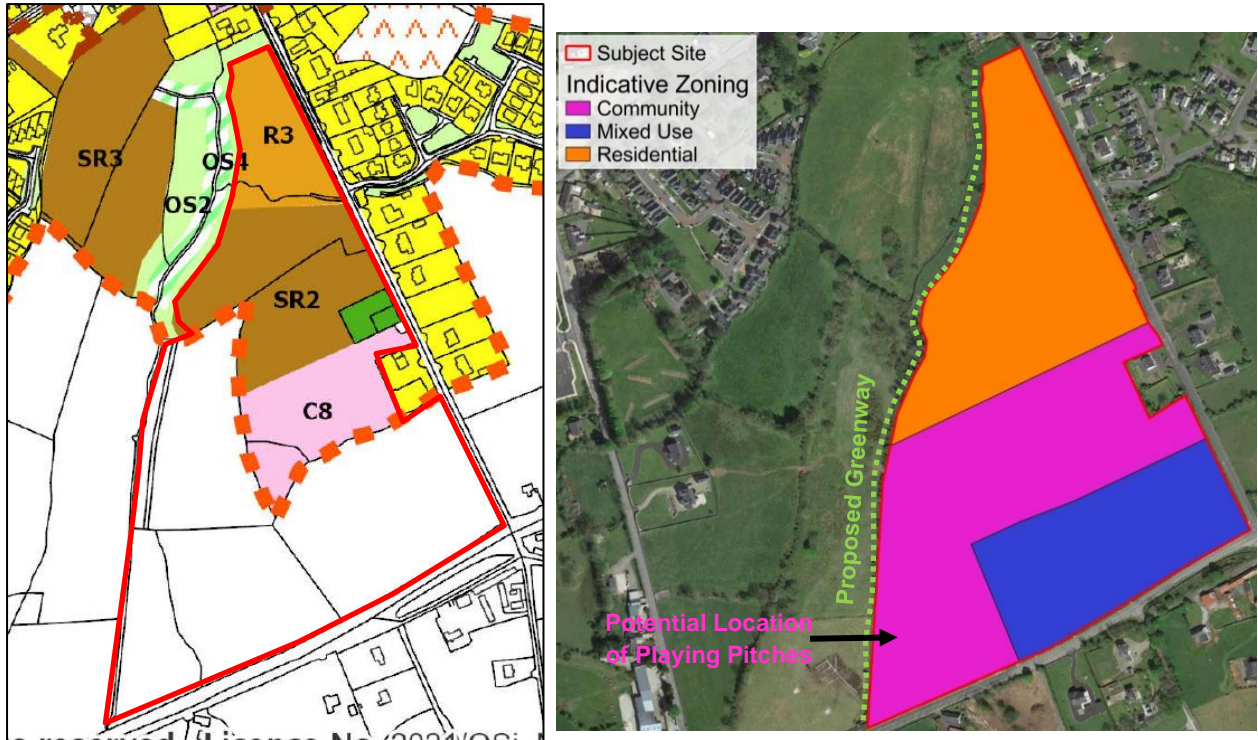


Figure 6.1: Draft Plan zoning VS Proposed Zoning

Residential

It is our client's submission that the extent of the proposed R3 lands as currently zoned are not viable for residential development. To address this issue, it is proposed that the R3 zoning be extended to a more central portion of the lands which are currently zoned 'Strategic Residential Reserve'. It is believed that with the extension of the proposed R3 zoning to the centre of the lands will aid in the creation of a strip of development fronting on the eastern edge of the lands and this would give a streetscape and provide connectivity to a larger residential development. The current playground located on the site would be relocated within adjacent community zoned area to provide a play space for future children within the proposed residential scheme meeting modern needs. The playground's current lease expires in 2027 and therefore the relocation of this space would be most suitable.

Recreation

Furthermore, our client proposes to develop a recreational greenway on the OS4 lands. This greenway will deliver a high-quality landscaped area with pedestrian and cycle routes creating better linkages to the Town Centre and the potential for community uses such as outdoor gym equipment that would be available to the wider community of Tulla. This greenway would be delivered as part of an integrated residential led development. By delivering this residential scheme complemented by these amenity areas, it would provide a planning gain not only for the future residents on the subject site but also the wider area.

Community

It is also respectfully requested to extend the Community C8 zoned portion of the lands to the south western section of the site and extend the zoning to the western boundary of the lands. This will allow community facilities to be delivered in Tulla, to accommodate the future growth of the settlement and will be more accessible in this location from the R352, the proposed residential lands and the proposed greenway. It is envisaged that this portion of the lands could accommodate playing pitches which would provide real planning gain to Tulla and allow for the relocation of the existing playground to a more appropriate location.

Mixed-Use

Lastly, it is sought to zone the south eastern portion of the lands as mixed-use for the delivery of uses such as a garden centre, light industry, or warehousing and other employment uses. It is believed that these new employment opportunities will complement existing employment providers such as Beckman Coulter and McGraths Quarries. Tulla has experienced an increase in development since 2018 and is expected to grow further. In the planning pipeline there are an additional 122 no. units granted under the current plan. This growth along with the planned growth under the Draft Plan will require additional non-residential uses to allow for the sustainable growth of Tulla. The provision of employment generating uses will actively contribute to reversing historic outward commuting patterns and assist in creating a more sustainable compact town. It is also considered that this portion of the lands could potentially deliver a form of tourist accommodation to meet demand generated by the growth of the tourism sector in East Clare, a form of accommodation that is currently lacking.

Settlement Boundary

It is also our client's request that the Settlement Boundary of Tulla is extended to encompass the entirety of the subject lands, to facilitate this vision and to create a gateway development for Tulla and East Clare. The inclusion of the above would enable the subject lands to act as a gateway to Tulla and East Clare, given their extensive frontage to the R352 and the sites proximity to Main Street and Ennis. This would result in the creation of a sustainable residential-led community which would aid and contribute to the town centre and support and complement the vibrancy of Main Street and settlement core. The development of these lands would create new linkages, deliver a new population, and contribute to Tulla settlement on a local level but also has the potential to contribute to the Region by developing Tulla as a gateway to East Clare tourism.

6.2 Delivery of Housing Units:

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of the country out to the year 2040. It is a national document that will guide the strategic planning and development of the country over the next 20+ years at a high-level, so that as the population expands, growth is sustainable (in economic, social, and environmental terms). A key aim of the NPF is to more efficiently and sustainably use the State's lands resources, particularly those in established urban areas. In such areas, the NPF expressly seeks the densification of suburban sites close to public transport and services and facilities.

The NPF targets the delivery of 550,000 additional homes (NPO 32) and seeks to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements (NPO 3a) and increase the Southern Region's population by 340,000 – 380,000 (NPO 1b). It is also one of the Strategic Aims of the Draft Plan to ensure that new housing developments in towns achieve compact growth and contribute of sustainable and healthy communities. Furthermore, the NPF favours development that can create attractive, liveable, well-designed urban places which are integrated with their communities (NPO 4) and encourage more people and generate more jobs and activity within existing towns (NPO 11). The Draft Plan encourages the development of new residential development in or adjoining town

centres such as the subject lands and to ensure that these developments provide a range of accommodation types and tenures and a high level of residential amenity (CDP5.3 c), which a residential development alongside a greenway on OS4 would deliver.

Housing for All was published in 2021 with an overall aim that everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place offering a high quality of life. That Plan states that Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set the targets for additional households outlined in the NPF.

A review of the demographic profile of the area has demonstrated that there is an apparent need for housing in Tulla, as the number of housing units has decreased from 2011-2016. As demonstrated in the socio-economic profile for the area, the Study Area has experienced population growth over the last census period. The population of Tulla is projected to increase by 81 persons within the life of the Draft Plan.

Currently the R1 zoned lands to the northwest of Town Centre received planning permission (Reg. Ref. 19/765) on 19/07/2021 for 36 no. dwelling houses including all associated roads, services, foul water pumping station, landscaping and road improvement works along front of the site including new footpaths and re-aligned junction with the R462. According to the National Building Control and Market Surveillance Office no commencement notices have been submitted to Clare County Council. It must be considered that although permission for 36 no. dwellings have been granted the commencement and construction of these units may not come forward.

The only other Residential zoned lands are those lands zoned 'R2 North of the Former St. Joseph's School'. It is noted that these lands have a historical residential zoning due to their location. However, from a review of planning history available online for Tulla, there is no record of any submissions for planning permission. It is therefore submitted that, although these lands are deemed to be suitable for residential development, there is no indication that these lands will come forward for planning permission within the lifetime of this Plan.

Enabling such inactivity to continue will hinder the Authority's ability to deliver the housing targets for Tulla as set out in the Core Strategy. Our client is in possession of lands currently zoned R3 and SR2 and is seeking to deliver these lands in the short to medium term. It is therefore submitted that for the lifetime of this Plan, our client's lands are more suited to ensuring the delivery of much needed housing.

6.3 Sequential Development of Tulla

As noted in Section 5 of this submission, of the 12.16 ha of land that has been identified for residential development since the adoption of the current plan, a total of 7.73 ha has not been brought forward for development and show no sign of doing so in the foreseeable future.

While the SLA has identified sites deemed to be suitable for residential development, it is considered that based on their status since the commencement of the current plan, it is considered unlikely that those lands zoned R2 will come forward for development within the duration of the Draft Plan and due to the costs prior to commencement of P.A. Ref. 19/765, the permitted development on lands zoned R1 may not come forward either. In comparison, the subject site has recently been purchased by our client with the intent to develop these lands and deliver much needed housing, community, and commercial services, all of which will be required to support the growth of Tulla. On this basis, it is considered that the subject site should not be prejudiced from coming forward in the near term.

The subject site has substantial development potential for a residential-led scheme, supported by community and mixed-use development. This assessment indicates that the subject lands are just as suitable, if not more suitable than some of the sites identified in the SLA. The 2 no. sites that were originally identified via the current development plan (excluding our client's lands), that show no signs of coming forward in the short or medium term have had opportunity deliver housing and have not. The

subject site shares many characteristics of these sites, as demonstrated in Table 5.3 and is in a position to deliver housing in the short to medium term. On this basis, it is our submission that the portion of the lands zoned 'Strategic Residential Reserve' should be rezoned 'Residential'.

The subject lands benefit from strong accessibility and connectivity routes. The southern boundary is bound by the R352 which is a direct route to Ennis (15-minute drive) which is a key town. As Ennis is a key town it benefits from an array of services, facilities, and employment opportunities and therefore due to Tulla's close proximity to Ennis, it is and should be expected to grow vastly. Furthermore, the subject site is only approximately 5-minute walking distance from Main Street in Tulla and should therefore be classed as a central and town centre site. The site is within walking distance to public transport and community services and facilities and a development on these lands would be in accordance with the 10-minute town centre concept. Our client also proposes to deliver a high-quality landscaped greenway which would be accessible for pedestrians and cyclists. This greenway would provide further connections to the R352 and Tulla town centre.

The delivery of a mixed-use development on these lands with non-residential uses such as a garden centre and employment uses will also deliver employment and community uses that Tulla as a growing settlement will require. Tulla has started to experience further growth since 2018 and is expected to continue growing. The delivery of a mixed-use development will allow Tulla to grow sustainably and will also provide employment opportunities and reduce outward commuting patterns to Ennis and other locations.

6.4 Connectivity

The subject site has strong connectivity with much of the boundary facing onto the R352 and therefore is a suitable location for a residential led development with community, mixed use development and the possibility of a small hotel, as the lands can be easily accessed by residents and tourists. The R352 is a direct route from Tulla to Ennis, and the subject site is approximately a 15-minute drive. Ennis is a key town and is host to a range of employment opportunities, services, and community facilities. The R352 also provides access routes to Scarriff (approx. 19-minute drive) and Killaloe (approx. 30-minute drive). Furthermore, the subject lands have the potential to deliver a greenway along OS4 creating better and sustainable connections to the town centre.

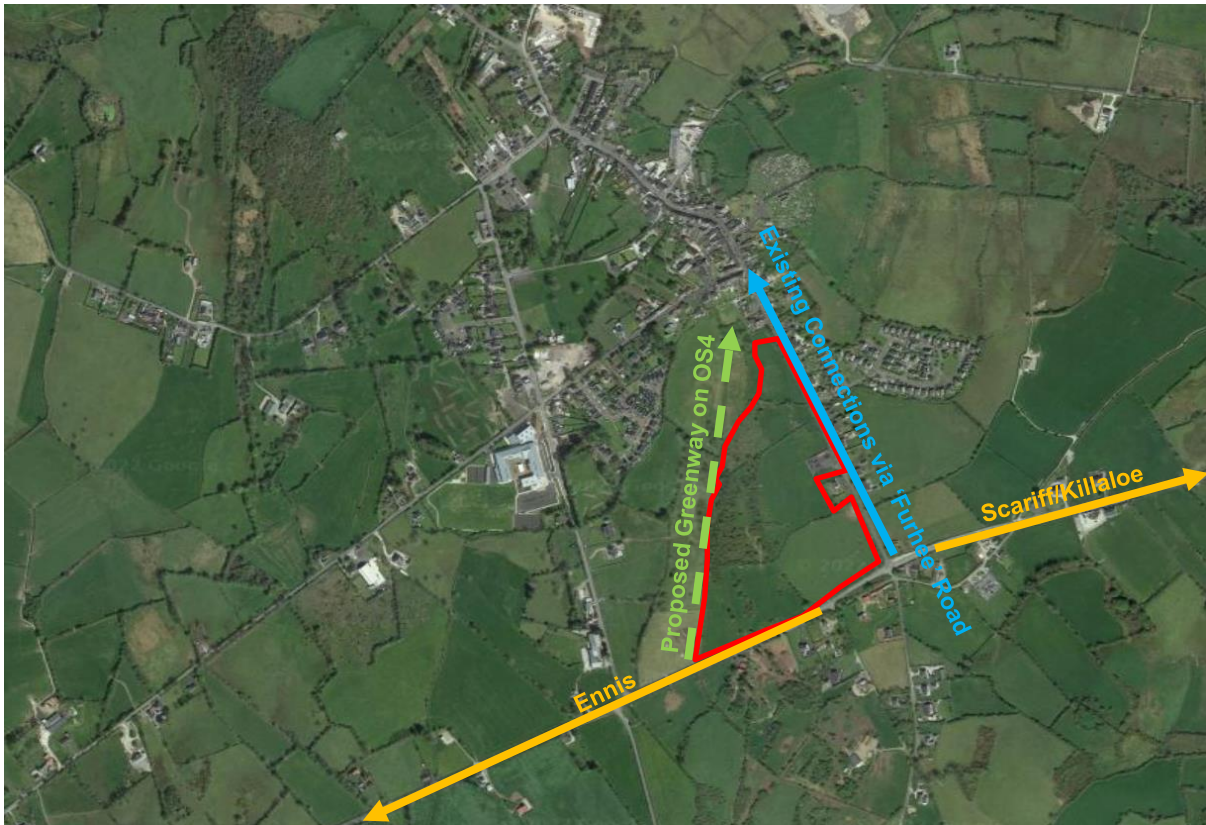


Figure 6.2: *Connectivity*

Our client, if provided the appropriate opportunity to develop these lands will deliver a greenway for pedestrians and cyclists along OS4 to deliver better and more sustainable linkages to the town centre from the subject lands. Along this greenway there is opportunities to deliver a landscaped high amenity area and for outdoor gym equipment for public use and targeted for all age groups. It is an objective of the NPF to ensure the integration of safe and convenient alternatives to the car are incorporated into the design of our communities, by prioritising walking and cycling to both existing and proposed developments and integrating physical activity for all ages (NPO 27). Therefore, it is submitted that future development of these lands will be in accordance with the National Policy set out above.

6.5 Water and Wastewater

As the Draft Plan states that Tulla is served by Shannon/Sixmilebridge Regional Water Supply and in the event of any shortfalls or outages the Broadford Public Supply may be used to supplement supply. The Draft Plan also states that the existing wastewater treatment plant has capacity available to service the needs of the future population target. Therefore, it is clear that Tulla has a strong water supply and has existing wastewater capacity for future residential development.

6.6 Delivery of gateway to Tulla and East Clare

As the Draft CCDP mentions the lands will mark the entrance of the town of Tulla. It is our client's ambition that these lands will act as a gateway to East Clare, given the lands extensive frontage to the R352 which is the main route from Ennis to Scarriff/ Killaloe. Tulla is the first small town settlement on this route and our client believes that Tulla can be a key focal point in the promotions and development of East Clare tourism. It is our client's submission that these lands can be a gateway for East Clare but also act as a gateway to Tulla town, and that an overall quality planned development will serve Tulla.

7.0 Implementation and Delivery

Our client, the landowner of the subject site is committed to working with Clare County Council to deliver housing, community uses, mixed-use development and potentially a small hotel for East Clare tourism on this site. Following the rezoning of these lands and extension of the settlement boundary, our client is prepared to commence engagement with the Planning Authority in terms of delivering a design solution that delivers on the objectives of national, regional, and local policy. Given the size and potential of the lands to deliver an integrated mixed-use development that would tie into the existing community and maintain the sustainable growth of Tulla, our client will ensure that any future redevelopment of the lands is informed by a masterplan. This will allow for an appropriately designed and planned development and would ensure that any development on these lands would be delivered in a sustainable manner.

8.0 Conclusion

This submission, underpinned by an evidence-based analysis, has clearly demonstrated how the subject lands, due to their strategic location and excellent connections to the settlement core and key town of Ennis represent a viable opportunity for the implementation of a much needed and fully integrated mixed use residential led development. The proposed amendments to the Draft Plan as outlined in this submission will facilitate the achievement of compact growth in line with national, regional and local planning policy.

The review of the demographic profile has demonstrated that there is a current need for housing which is evidenced by the loss of residential units and the increase in population that occurred from 2011-2016 and a projected increase in population that is expected over the lifetime of the development plan, and beyond. The extension of the community zoned lands and the inclusion of the mixed-use zoning objective will facilitate the establishment of a sustainable community through the targeted and planned delivery of employment-based uses to support projected growth and reverse historic outward commuting patterns. It is imperative that existing and future residents have employment options within their locality.

From a sequential development perspective, the subject site is better positioned than many of the proposed residential zoned lands to come forward in the short to medium term due its contained and coherent landholding within single party ownership. Furthermore, this assessment has demonstrated that a significant amount land that has been identified for residential development has been inactive for quite some time and shown no visible signs of development since the commencement of the current plan in 2017. The failure to address this issue and ensure that development ready lands such as the subject site will impede upon the Authority achieving its housing targets for the area and ultimately put Tulla's growth potential at risk

Having regard to the above, it is respectfully submitted that the Planning Authority accept the amendments to the Draft Plan sought under this submission to safeguard and protect the growth and development of the Tulla settlement.

Appendix A

Table A: *Facilities identified in 4.2.9*

Facilities Audit	
Childcare	Bambini Kids Ltd
Childcare	Tulla Community Preschool
Community and Civic Services	Tulla Garda Station
Community and Civic Services	Tulla Courthouse
Community and Civic Services	Employment Exchange
Community and Civic Services	Cnoc na Gaoithe Comhaltas Cultural Centre
Community and Civic Services	Tulla Library
Community and Civic Services	Bank of Ireland
Community and Civic Services	Tulla Post Office
Education and Training	St. Mochulla's National School
Education and Training	St. Joseph's Secondary School
Healthcare Services	Tulla Health Clinic
Healthcare Services	Tulla Pharmacy
Open Space, Sport and Recreation	Fair Green
Open Space, Sport and Recreation	Tulla Community Playground
Open Space, Sport and Recreation	Tulla Running Track
Open Space, Sport and Recreation	Tulla G.A.A
Open Space, Sport and Recreation	Tulla United AFC
Religious Institutions and Burial Sites	Tulla Cemetery
Religious Institutions and Burial Sites	O'Callaghan's Funeral Home
Religious Institutions and Burial Sites	St. Peter and Paul's Church
Retail Centres and Services	O'Halloran's Service Station
Retail Centres and Services	SuperValu Tulla