

From: [REDACTED]
To: [Development](#) [REDACTED]
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029 for Tulla lands
Date: Tuesday 7 April 2026 14:39:37
Attachments: [REDACTED]

Good afternoon,

We wish to make the attached submission on behalf of Wiskin Property Development in response to the public consultation on Proposed Variation No. 1 to the Clare County Development Plan 2023–2029.

We would welcome the opportunity to engage further with the Council in relation to the next steps in the process.

Please confirm receipt of this submission.

Kind regards,

Abis

Syed Abis Raza Zaidi | Senior Consultant | KPMG Planning
KPMG Ireland | Infrastructure Advisory - Sustainability | Infrastructure | Planning

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Section within KPMG Ireland: KPMG Planning (KPMG Infrastructure Advisory)

Forward Planning Section / Planning Department
Clare County Council
New Road
Ennis, Co. Clare
V95 DXP2

07 April 2026

Re: Submission to proposed Variation No. 1 to the Clare County Development Plan 2023-2029 Killaloe Municipal District Settlement Plans (Volume 3c); Tulla - Proposed refinement of zoning map and associated site objectives for lands at Loughaun South / Ashler, Tulla, Co. Clare

Dear Sir/Madam,

Executive Summary

- This submission is made by KPMG Planning on behalf of Wisikin Property Development Limited c/o Cuddihy & Company, Station Road, Ennis, Clare, V95 C6RP in respect of lands at Ashler, Tulla, Co. Clare.
- The submission is made in response to the proposed Variation No. 1 to the Clare County Development Plan 2023-2029 and its stated objective to provide for planned, serviced and deliverable growth over the plan period.
- We support the overall direction of the proposals for Tulla, including the emphasis on compact growth, infrastructure alignment, and place-based delivery, recognising the need to accommodate locally-generated housing demand and to strengthen the settlement's role within the wider county settlement hierarchy.
- Wisikin Property Development Limited seeks three modest but important adjustments that, collectively, improve the coherence, legibility and deliverability of the plan framework for this part of the village:
 1. A slightly larger residential zoning area is sought for the R8 plot, to support a residential-led, appropriately mixed scheme with the necessary capacity to integrate supporting open space and local services in a functional way;
 2. A slightly larger community zoning is sought for the C8 plot, to ensure the community lands are appropriately sized and configured to be deliverable and meaningful in practice; and,
 3. The submission seeks a 15m wide "Buffer Space" zoning along the western corridor, applying an existing land use zoning in the Plan, to establish a clear edge condition and an appropriate landscaped/green interface.
- In addition, the submission seeks to refine an important piece in the proposed Variation's written provisions for the subject lands, particularly the impact of proposed amendment "PA 3c - 10c" on the unlocking of and deliverability on the R8 plot. As currently drafted, this text objective introduces ambiguity that risk sterilising or delaying delivery despite the lands being zoned for residential development. We therefore propose revised, delivery-focused wording for the relevant site objectives to provide clarity, certainty and a workable framework for sustainable development.
- These refinements are respectfully submitted as practical refinements specifically intended to support a more robust, implementable and high-quality outcome when the Variation is adopted, from a local promoter who has ambitions for timely delivery across the lands.

1.0 Introduction

This submission is made by KPMG Planning on behalf of Wiskin Property Development Limited c/o Cuddihy & Company, Station Road, Ennis, Clare, V95 C6RP in respect of lands at Ashler, Tulla, Co. Clare. The submission is prepared in response to the public consultation on Proposed Variation No. 1 to the Clare County Development Plan 2023-2029.

The purpose of the submission seeks targeted refinements to the proposed Variation mapping for Tulla. The requested changes are intended to ensure that the final adopted map is clear, coherent and capable of implementation in practice. Experience across Development Plan processes have shown that relatively small zoning boundary misalignments can have disproportionate consequences at project stage, such as through unnecessary sterilisation of land, fragmented development blocks and “ransom strips”, uncertainty at settlement edges, and difficulty in delivering community infrastructure in an integrated way. This submission is therefore framed as a pragmatic mapping improvement exercise.

2.0 Proposed Variation and site context

The proposed Variation process includes amendments to the written and mapped components of the Development Plan, including the settlement plan mapping that provides the spatial framework for zoning outcomes in Tulla. This submission relates directly to Tulla, and should be read in particular alongside the published Volume 3C Killaloe Municipal District Settlement Plans document.

The published materials for Tulla illustrate a settlement boundary and a range of existing and proposed zoning designations within and around the village. Within this framework, the subject request concerns three particular elements shown on the map:

1. R8: an identified residential zoning plot, located at the settlement edge and forming part of the Plan’s residential land supply for the village.
2. C8: a community zoning plot located in proximity to R8, intended to provide for community infrastructure/facilities to support the settlement.
3. A western corridor along the settlement edge where a clear, plan-led interface treatment is desirable to avoid ambiguity at the boundary between zoned lands and the adjoining countryside/edge context.

3.0 Proposed alterations

3.1 R8: proposed slight expansion of Residential zoning (deliverability)

Wiskin Property Development Limited seeks a slightly larger Residential zoning area associated with the R8 plot (an additional 0.44ha is proposed - see mapping later). The rationale is to ensure the residential zoning is a coherent and functional development block, capable of accommodating a residential-led scheme that is appropriately mixed and can incorporate supporting open space and local services in a planned manner. Additionally, the location of the wayleave for the UE sewer directly influences the geometry of the additional triangular residential area being proposed (See Figure 1 below).

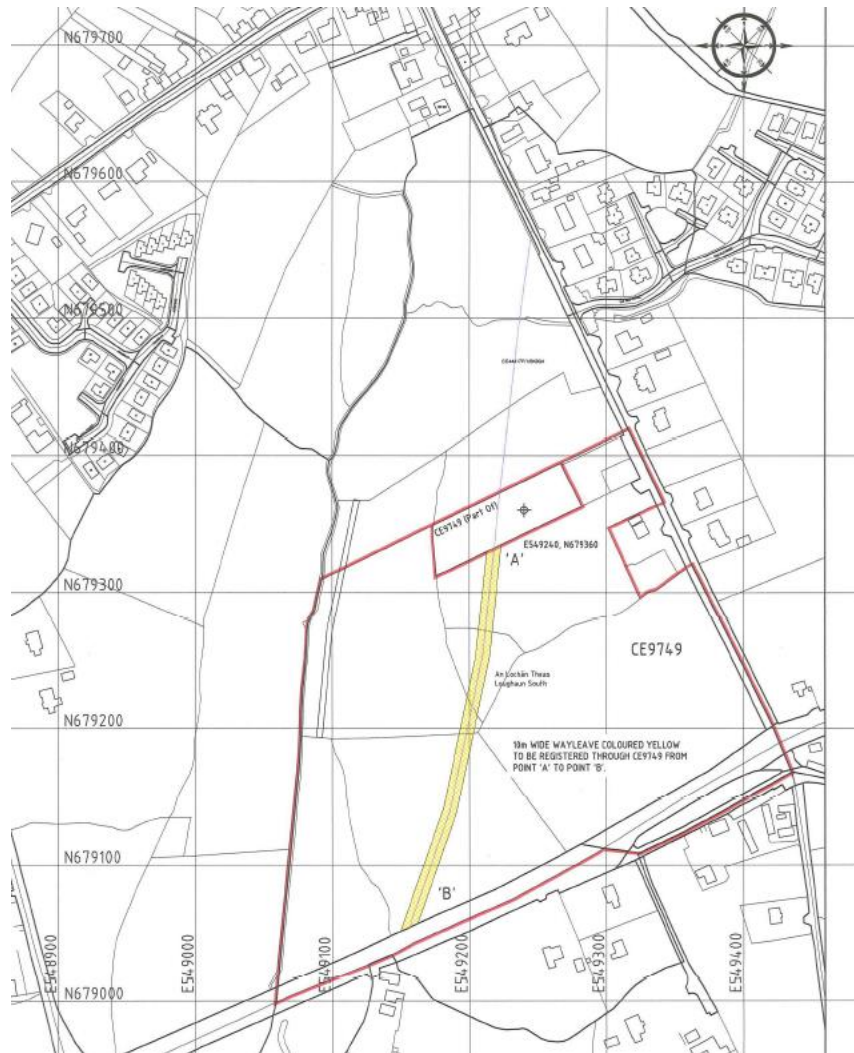


Figure 1: Site Location Map showing the wayleave for UE sewer adjacent to the proposed additional area for residential as part of the R8 plot (Prepared by PHM Consulting).

As aforementioned, minor boundary adjustments can be decisive for deliverability. A residential zoning that is too tight, irregular or artificially constrained can lead to inefficient layouts, sub-optimal access arrangements, difficulty in providing meaningful open space, and reduced flexibility to respond to detailed site conditions identified at design and assessment stage. Conversely, a modest rationalisation/expansion of the residential boundary can provide the spatial “room” needed to support an efficient site structure (including a logical internal movement pattern); appropriate density and typology mix without compromising design quality; integration of useable public/open space as part of the scheme rather than as residual land; and, a stronger relationship between the residential lands and the wider village structure. Preliminary studies by KPMG Planning alongside Arnold Leahy Architects reaffirm this requirement.

The request would support the Plan’s stated ambition for planned settlement growth, ensuring the mapped residential land supply can translate into an implementable, high-quality outcome when brought forward.

3.2 C8: proposed slight expansion of Community zoning

The submission also seeks a slightly larger Community zoning area associated with the C8 plot (an additional 0.43ha is proposed - see mapping later). Community infrastructure will work best for Tulla when it is planned as a real and deliverable component of growth, with adequate spatial provision and flexibility

to respond to delivery pathways (whether through direct provision, phased delivery, partnership models, or other mechanisms). Where community zoning is too constrained in footprint or awkwardly configured, there is a risk that it becomes nominal, and so difficult to implement meaningfully in practice. A modest increase in the community zoning area at this stage would materially improve deliverability (by ensuring a feasible footprint for facilities/amenity space); flexibility (allowing the community use to respond to Tulla's identified needs over time); integration (ensuring community lands are positioned and sized to relate effectively to surrounding residential areas); and, placemaking outcomes (supporting a legible focal point or community asset rather than an isolated residual site). The proposed adjustment will ensure the community zoning performs the function intended by the Plan's settlement framework i.e. to support sustainable growth by embedding the enabling community layer alongside residential development.

3.3 Western corridor 15m "Buffer Space" zoning

The submission also proposes the introduction of a 15m wide "Buffer Space" zoning along the western corridor. Buffer Space is an existing land use zoning within the current county plan framework, and its application here is intended to provide a clear and consistent interface at the settlement edge. The planning rationale for this includes that it would provide a legible edge condition that can be consistently interpreted by Council, the local community and Wiskin in promoting the timely delivery of residential development on the R8 lands. This reduces ambiguity at development management stage and provides a stable framework for design development. In addition, settlement edges often require a proportionate landscaped/green interface to manage visual transition, amenity and boundary conditions, and so a Buffer Space designation provides an explicit land use basis for that interface, rather than relying on discretionary expectations later. Finally, the proposed buffer would help to ensure that future development is delivered with a considered settlement edge, supporting a stronger overall placemaking outcome and reducing the risk of hard or abrupt interfaces that can undermine the character and coherence of the village edge. We submit that the 15m width is sufficient to establish a meaningful buffer function while remaining practical in land take terms for commercial viability and overall deliverability. It also provides a clear mechanism for integrating landscape structure, boundary planting, and potentially linear green link functions (where appropriate), without undermining the delivery of the core residential and community zonings sought through the R8 and C8 refinements.

4.0 Combined impact of the proposed alterations

While the three requested refinements are presented individually, they are ultimately a coordinated set of subtle improvements that strengthen the local plan framework for this part of Tulla:

1. The R8 adjustment supports a residential block that can be planned and delivered coherently, with proper integration of open space and supporting services.
2. The C8 adjustment ensures that community zoning is realistically deliverable and capable of serving the growing settlement.
3. The 15m Buffer Space corridor provides a stable edge condition, improving certainty, interface quality and long-term settlement form.

In combination, these refinements support the practical intent of a plan-led zoning framework: to provide spatial certainty, reduce avoidable constraints at delivery stage, and embed accessibility, coherence, meaningful community provision proportionate and aligned with Tulla's needs, and clear edge/interface expectations.

We respectfully propose alternative wording to replace proposed amendment "PA 3c -10c", as follows:

***PA 3c - 10c Add text objective for proposed residential zoning R8
R8 -West of Residential (R3) and Community (C8)***

Any future planning application for R8 shall provide for access to the site via the adjoining Community lands (C8), with the access arrangement to be delivered as part of, or in a manner that demonstrably enables, the comprehensive development of C8. Development proposals shall provide a landscaped buffer along the western boundary adjoining the stream, to be retained as Buffer Space as a clear settlement edge and riparian interface. A Traffic and Transport Assessment shall accompany proposals to demonstrate safe pedestrian, cycle and vehicular access and road safety, including appropriate connections to the village and to adjoining zoned lands.

The access approach via C8 is proposed because it enables a single coherent movement framework, supports integrated delivery of community infrastructure alongside housing, and specifically avoids creating a dependency on development across third-party lands. It also reflects good plan-led sequencing as community enabling infrastructure and the primary access spine are delivered first, thereby ‘unlocking’ the adjoining residential lands in an orderly and comprehensive manner.

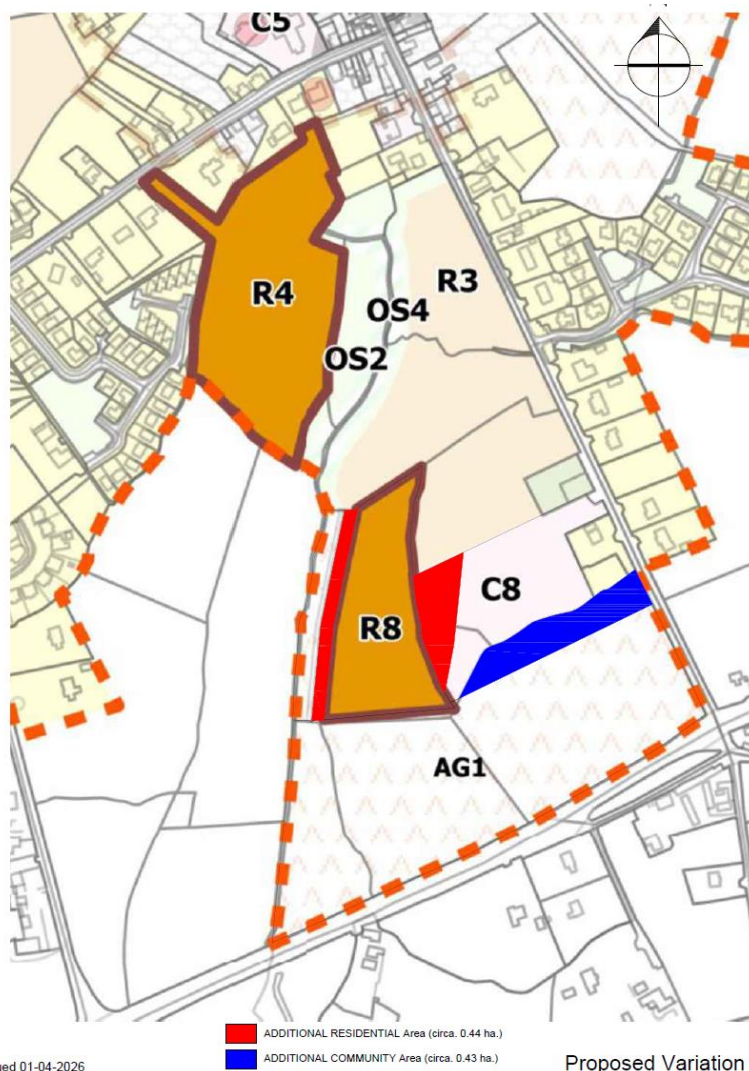
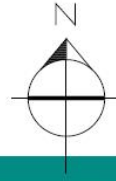






Figure 2: Overlay mark-up to the proposed variation no. 1 map associated with Tulla, showing the modest but impactful additional area proposed for residential as part of the R8 plot, and the modest but impactful additional area proposed for community as part of the C8 plot.



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Lands at Tulla, Co. Clare

-  Re-Zone to RESIDENTIAL
-  Re-Zone to COMMUNITY
-  AGRICULTURE
-  Re-Zone to BUFFER (circa 15m wide)

AERIAL MAP

Figure 3: Aerial image of the subject lands and environs, with overlay mark-up showing the herein proposed areas for revised R8 (residential) and C8 (community) plots, and demonstrating the “buffer space” zoned linear corridor along part of Wiskin’s western boundary. Note the residential planning permission to the north is controlled by an entirely unrelated party.

5.0 Conclusion

For the reasons set out above, KPMG Planning, on behalf of Wiskin Property Development Limited, **respectfully requests that Council adopt the following targeted refinements to the proposed Variation mapping for Tulla:**

1. a slight expansion of the Residential zoning to the R8 plot;
2. a slight expansion of the Community zoning to the C8 plot; and
3. the designation of a 15m wide “Buffer Space” zoning along the western corridor, applying an established land use zoning category shown in the Plan’s legend.

Further we propose alternative wording for proposed amendment “PA 3c - 10c” (as outlined in section 4 earlier).

These changes will improve the coherence and functionality of the zoning pattern, strengthen deliverability, and provide an appropriate plan-led settlement edge condition.

Wiskin Property Development Limited remains available to engage constructively with Council to assist in finalising the adopted map in a clear and implementable manner.

Yours sincerely,



Stephen M. Purcell
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Director and Co-Head
KPMG Planning