

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission re Vol 3a (iv) To Variation No 1 to the Clare County Development Plan 2023- 2029 - Hospital Roundabout
Date: Wednesday 1 April 2026 14:05:02
Attachments: [REDACTED]

Dear Sir or Madam (Development Planner)

Please accept this submission

I refer to Vol 3a (iv) titled Ennis Local Transport Plan “ dated 6th March 2026 .

A. I object to the wording in the current version of Vol 3a(iv) , Variation No 1.

**1. at page 116 of Vol 3a(iv) which outlines the proposed preferred option for the Hospital Roundabout , namely
- Option Ref “ J2 Gort Road Highfield Park - upgrade junction to provide safe pedestrian and cycling movements “ , and**

2. at S6.5.2 of Vol 3a(iv) which states “ A revised junction design enabling layout for safe pedestrian and cycling movements will be considered following detailed modelling . In order to address impacts on traffic flow and congestion , modelling assessment will include the full section of road from IvyHill/Gort Road junction to the Hospital Roundabout.”

For reasons outlined at C below.

B. I request amendment of wording in adopted version of Vol 3a(iv) Variation No 1 to read as follows ,

**1. at page 116 of Vol 3a(iv) which outlines the proposed preferred option for the Hospital Roundabout , namely
- Option Ref “J2 Gort Road Highfield Park - upgrade junction to maintain the current access & exit to Gort Road Shopping Centre and provide safe pedestrian and cycling movements “ ,**

2. at S6.5.2 of Vol 3a(iv) to state “ Whilst maintaining the current access & exit to Gort Road Shopping Centre , efficient emergency vehicles usage , a revised junction design enabling , layout for safe pedestrian and cycling movements will be considered following detailed modelling . In order to address impacts on traffic flow and congestion , modelling assessment will include all roads (public and Shopping Centre) currently using the Hospital Roundabout.”

C. Grounds for objection to wording in proposed junction upgrade titled “J2” in Vol 3a(iv) of Variation No 1 and request for amendment of J2 to ensure permanent retention of access/exit from Gort Road Shopping Centre (GRSC) to Hospital Roundabout Junction

My name is Aaron Byrne and I am the Owner Operator of Aarval Ltd. T/A McDonald's Restaurants Ennis. I have appointed Downey Planning Consultants & NRB Consulting Engineers to prepare my full submission to Clare County Council in the context of the Ennis Local Transport Plan, which is currently on public call for submissions.

I write to express my concern regarding an element of the proposal which will directly affect the use and vitality of my premises. Specifically, the proposed removal of the Gort Road / Highfield Park roundabout, as set out in the LTP, will result in the loss of direct access from the roundabout to my restaurant, with customers being forced to manoeuvre through the busy Elm Park Shopping Centre to reach it instead. As set out within the aforementioned submissions, this will cause significant negative impacts on not only the traffic conditions in the area, but also on the operations and financial viability of my restaurant.

As such, I write to request the removal from the Ennis Local Transport Plan of all references to:

1: Any proposed alteration to the existing road exits/entrance to the existing Gort Road/Highfield Park Junction (Hospital roundabout, better know as Gort Road Shopping Centre Roundabout)

2: Any proposed alteration to the existing roundabout layout – the current two lane free flowing roundabout, road entrance / exit and the associated three pedestrian crossings, (one with traffic lights) were installed, constructed and fully paid for by the developers of the retail units at the Gort Road Shopping Centre in accordance with the granted statutory planning permission and conditions issued by Clare County Council, including the McDonald's Drive-Thru Restaurant.

Removal of both or either access or exit into/from GRSC at Hospital Roundabout would have impacts ;

1. Interference in Constitutional property rights ie access to retail units which would if necessary result in Judicial Review proceedings

2. Detrimental impact on existing rate paying businesses , who pay over €100,000 rates pa to Clare Co Co , by removing what is the established access for 75% of customers .

3. Site Developer and subsequently the unit owners paid for the development and construction of the roundabout and pedestrian crossings (one signaled) circa €500,000

4. Planning permission and loan approvals for unit purchases require compliance with the site layout and drawings submitted which achieved planning permission for the shopping centre including the traffic

access to/from the roundabout.

5. No consultation with the affected individual property owners and business owners prior to publication of the draft LTP or since.

6. The current roundabout has no accident history .

7. Increased Health and Safety Risk with any interference or reduction to current safe & approved access for HGV delivery vehicles and petrol & diesel delivery trucks which currently comply with Dangerous substance regulations.

8. Potential job losses to the over 200 employees in GRSC's 12 employers, including busy Petrol Station, HSE Community Care, Retail, Restaurants, Doctors surgery ,Pharmacy ,etc .

9. Restrict access to the only available Petrol Station on the Gort Road without going outside the town boundary.

Please find attached, for your convenience, full submissions prepared by Downey Planning Consultants and NRB Consulting Engineers, which provide further context on this matter. Should you require any further feedback, or have any questions, please do not hesitate to contact me directly.

Thank you for giving this matter your consideration and am more than happy to meet over a coffee to discuss further.

Kind Regards

Aaron Byrne

Kind Regards / Le Meas

Aaron

My working day may not match your working day. I respect that your working arrangements may be different so please respond when convenient for you.

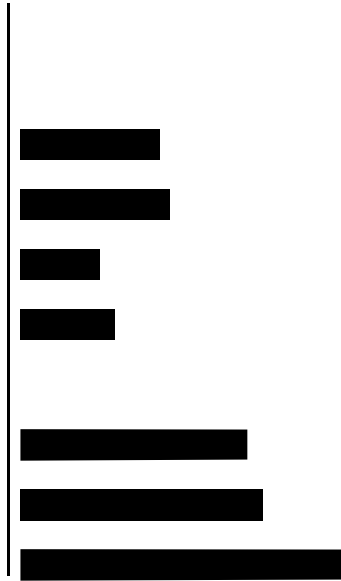


Aaron Byrne

Franchisee of McDonald's



Forever Partnership



D C W N E Y

DRAFT LOCAL TRANSPORT PLAN

Ennis Draft Local Transport Plan

(STAGE I CONSULTATION)

Client: Aarval Limited, T/A McDonalds Restaurants

June 2025



EXECUTIVE SUMMARY

This submission is made by DOWNEY, on behalf of our client, Aarval Limited, T/A McDonalds Restaurants, and is submitted to Clare County Council in the context of the Ennis Local Transport Plan, which is currently on public call for submissions. The Local Transport Plan (LTP) provides a baseline assessment of Ennis, before setting out the objectives, development options, options assessment, and preferred strategy. It is noted that no detailed design of any objectives has been published within this initial Plan. Our client welcomes the plan but have observations and concerns on proposals which will directly affect the use and vitality of their premises.

This submission has been prepared on behalf of our client, Aarval Limited, T/A McDonalds Restaurants, in the context of the existing McDonald's Restaurant located at Gort Road, Ennis V95 W956. Our client's site is conveniently located off the Gort Road / Highfield Park roundabout in which there is a link from the roundabout leading directly to our client's restaurant. DOWNEY also note that within the parent permission for our client's restaurant, Reg. Ref. 0321194 / ABP Ref. PL58.211183, Condition 5 required the applicant (McDonald's Restaurants of Ireland Ltd.), to construct this roundabout at their own expense. Now, within the Ennis LTP, Clare County Council are proposing to remove this roundabout, and convert to a 3-arm signalised junction. As a result of this proposed change, our client will lose their direct access from the roundabout to their restaurant, with customers now being forced to manoeuvre through the busy Elm Park Shopping Centre to reach the McDonald's Restaurant.

As set out within this submission, this will cause significant negative impacts on not only the traffic conditions of the area through the removal of this access point, but also on the operations and financial viability of this thriving McDonald's restaurant. The removal of this junction will also raise various health and safety risks, particularly given its location beside Ennis Hospital. For the reasons set out within this submission, it is requested that these works don't go ahead and that the Plan be amended to remove this proposal.

TABLE OF CONTENTS

| | | |
|-----|--|----|
| 1.0 | INTRODUCTION..... | 4 |
| 2.0 | LEGISLATIVE BASIS | 5 |
| 3.0 | ENNIS LOCAL TRANSPORT PLAN | 5 |
| 4.0 | PLANNING CONTEXT | 6 |
| 5.0 | PLANNING SUBMISSION | 9 |
| 6.0 | CONCLUSION..... | 15 |
| | APPENDIX 1 – NRB TRAFFIC SPECIALIST LETTER | 17 |

D O W N E Y

This planning submission is made in response to the preparation of the Ennis Local Transport Plan. This submission relates specifically to the proposed design at the Gort Road/Highfield Park roundabout. McDonald’s Restaurants of Ireland Ltd. built this roundabout at their own expense as part of the opening of this new store under Reg. Ref. 0321194 / ABP Ref. PL58.211183. It is now the intention of Clare County Council to remove this roundabout and replace with a 3-arm signalised junction, this work will also result in the loss of the main entrance point to the McDonalds store which is a serious threat to the commercial viability of the store. We would therefore respectfully request that Clare County Council consider the strategic content within this planning submission. DOWNEY would like to thank the Council for the opportunity to make this submission, on behalf of our clients, who have operated in the area for 20+ years.

1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the “Ennis Local Transport Plan” by Clare County Council, on behalf of our client, Aarval Limited, T/A McDonalds Restaurants, Gort Road, Ennis V95 W956.

This written submission is made in response to an invitation for comments from interested parties, and it is being made within the specified timeframe for submissions, i.e., 27th June 2025, as set out on Clare County Council’s consultation portal.

Clare County Council have published a Local Transport Plan (LTP) for the town of Ennis. As set out in the LTP, it will “*establish a strategic framework for transport investment in Ennis. The LTP will be the first town wide transport plan since the early 2000’s and will look at Ennis in the context of its role as the largest town in the region.*” The LTP provides a baseline assessment of Ennis, before setting out the objectives, options development, options assessment, and preferred strategy. It is noted that no detailed design of any objectives has been published within this initial Plan.

DOWNEY, on behalf of Aarval Limited, T/A McDonalds Restaurants wish to object to Objective Ref. J2, at Gort Road/Highfield Park, which is as follows:

“Reconfigure junction into 3 arm signalised junction with removal of commercial access.”

Our client’s established restaurant is located at Gort Road, Ennis, V95 W956, and is accessed directly off the above commercial access which is now proposed to be removed. Our client’s premises is surrounded by multiple retail and commercial offerings within Elm Park Shopping Centre as part of a thriving commercial area. The above objective will have a significant detrimental impact and provide a serious threat to the operation and viability of the existing established restaurant through the “*removal of commercial access.*” This will result in the loss of 50% of customer access to these commercial units, thus significantly impacting their operations. This impact will occur to not only our client, but to all operators within the area, including Centra, Circle K, Elm Medical Centre, local cafés, local takeaways, and various office spaces. As such, in the interest of healthy placemaking and commercial viability, it is requested that the proposed plans be removed from the LTP.

As set out within this report, our client has been in operation at this location for 20+ years. As part of the construction of the McDonald’s restaurant (under Reg. Ref. 0321194 / ABP Ref. PL58.211183), the applicant, within the grant of permission, was stipulated to invest significantly into the local road infrastructure, at their own expense. This cost amounted to circa €500,000 in total which is a significant investment. Due regard should therefore be had on this financial investment, and the existing junction arrangement should be remained as it.

This submission seeks to highlight the importance of the existing junction, and the impact that the removal of the main access point will have on the operations of not only our client, but all operators within this junction at Elm Park Shopping Centre. Our client was also disappointed to first hear about this proposal through the publication of the Plan online, with zero public engagement with the key local stakeholders completed.

Aarval Limited, T/A McDonalds Restaurants, have also engaged the services of NRB Consulting Engineers, to provide a technical traffic letter as part of this overall submission, which has been included in Appendix 1 of this submission which Clare County Council are invited to refer to. NRB Consulting Engineers are traffic specialists and have 35+ years' experience relating to this sector. NRB Consulting Engineers have reviewed the LTP and request that the Council reconsider their proposal to close the access from Gort Road (Hospital) Roundabout owing to the very significant Traffic Safety and Traffic Capacity concerns identified, which will undoubtedly have significant consequences for McDonald's trade and associated local employment.

2.0 LEGISLATIVE BASIS

The LTP is being developed in line with the National Transport Authority's (NTA) Area Based Transport Assessment (ABTA) methodology. This process has been defined to ensure a consistent, evidence, based approach to the development of LTPs nationally.

This document has been developed at a strategic level in accordance with national and regional policies and sets out proposals which will undergo further stages including detailed design and planning before delivery.

The planning process and additional engagement on the final design required will depend on the scheme. Some schemes will require Part XIII approval including statutory consultation and formal vote by elected members. Some schemes may go to An Coimisiún Pleanála, some schemes may proceed via Section 38 of the Road Traffic Act, 1994. For schemes where the chosen options involve more limited intervention, additional statutory consultation on the scheme is not required.

3.0 ENNIS LOCAL TRANSPORT PLAN

Clare County Council have published the Ennis Local Transport Plan (LTP) for public consultation. As set out in the LTP, it will *"establish a strategic framework for transport investment in Ennis. The LTP will be the first town wide transport plan since the early 2000's and will look at Ennis in the context of its role as the largest town in the region."* The LTP provides a baseline assessment of Ennis, before setting out the objectives, options development, options assessment, and preferred strategy.

The LTP sets out various option developments and an assessment of these options, while also discussing the emerging preferred strategies. DOWNEY notes that no detailed design has been published as to these options.

The LTP looks at various proposals including Active Travel, Public Transport, and Road Traffic Management Options. The Plan also sets out various proposals in relation to the above, with amendments proposed to core routes/roads; town centre streets, lanes, and parking; traffic management and road infrastructure; and junction upgrades.

With specific regard to our client's site along Gort Road, the following is mentioned within the Plan:

"Gort Road/Highfield Park (Hospital Roundabout) – reconfiguration into three arm signalised junction with removal of access to McDonald's arm here (access to McDonald's via entrance to Centra on Gort Road)"

- *Potential to provide bus priority here for town bus service”*

And:

| Option Ref. | Location | Description |
|-------------|--------------------------|--|
| J2 | Gort Road/Highfield Park | Reconfigure junction into 3 arm signalised junction with removal of commercial access. |

As set out within the Implementation and Phasing chapter of the Plan, this option is considered a short-term priority, to be delivered up to 2030.

For the reasons set out in Section 5 below of this report, DOWNEY on behalf of Aarval Limited, T/A McDonalds Restaurants, wish to strongly object to these proposals. DOWNEY also submit on behalf of our client that they were disappointed that no engagement was held with the local stakeholders prior to publishing this Plan and now wish to set out their reservations against the proposals. Aarval Limited, T/A McDonalds Restaurants also note that there are currently no bus services along this road, and as such, no alteration is required to the road network.

4.0 PLANNING CONTEXT

4.1 Planning History Site Specific

Reg. Ref. 0321194 / ABP Ref. PL58.211183: By Order dated 18th October 2005, An Board Pleanála upheld the local authority’s decision and granted permission to McDonald’s Restaurants of Ireland Ltd., for a single storey, free-standing, drive-thru restaurant with facility for sale of hot food for consumption off the premises, with ancillary signage and car-parking and with access from N18 Gort Road via adjoining proposed retail development and egress to N18 Gort Road.

Within the Board Order, the following conditions are of relevant:

“5. The developer shall construct the enlarged roundabout as part of the public road network in accordance with the requirements of the planning authority, the design shall conform to NRA 16/93 standards and a road safety audit shall be submitted prior to commencement of development.

Reason: In the interest of traffic safety.

6. The pedestrian crossings shall comply with the requirements of the planning authority and pedestrian crossings from Gort Road and Highfield Park shall be provided.

Reason: In the interest of traffic safety.

15. The developer shall pay to the planning authority a financial contribution of €9,117.50 (nine thousand one hundred and seventeen euro and fifty cent) in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000. The contribution shall be paid prior to the commencement of

development or in such phased payments as the planning authority may facilitate and shall be subject to any specified indexation provisions of the Scheme which shall be applied from the date of the making of the said Scheme.

Reason: It is a requirement of the Planning and Development Act 2000 that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission."

This acts as the parent permission of the McDonalds restaurant on site. Since then, various applications have been made on the subject site for amendments to the restaurant.

Reg. Ref. 0321171: By Order dated 7th January 2005, permission was granted to T Sheils & Co for (1) demolition of garage and retail outlets, (2) Construction of new supermarket including ancillary areas and storage at 1st floor level (3) Construction of 6 no. 2 storey retail outlets with ancillary areas (4) Construction of a standalone petrol kiosk (5) Provision of an A.T.M. outlet (6) Construction of an underground car park, (7) Provision of ancillary site works services and over ground car parking.

Within this decision, the following conditions are of relevant:

3. The proposed enlarged roundabout to be provided in lieu of the existing roundabout shall be constructed by the developer at his own expense at the same time as the development itself and in accordance with a strategy to be approved by the Council before development commences. The design of the enlarged roundabout shall be in accordance with NRA TD 16/93. A Road Safety Audit shall be submitted with full design details in advance for the Council's approval and these details shall include vertical and horizontal sections/alignment details, structural and surface design proposals, drainage and other services related proposals, public lighting proposals, road markings, signage details, raised island design details including that of the centre island etc.

Reason: In the interest of traffic safety.

4. The pedestrian crossing shall be provided at the developers own expense and constructed to the Councils satisfaction. The pedestrian crossings shall not be raised in brick as proposed. Prior to commencement of development the developer shall submit to the Planning Authority for agreement full details of pedestrian crossings on the Gort Road and Highfield Park.

Reason: In the interest of pedestrian traffic safety

This acts as the parent permission of Elm Park Shopping Centre, with various amendment applications made since then.

As can be noted from the above Conditions of Reg. Ref. 0321194 / ABP Ref. PL58.211183 and Reg. Ref. 0321171, the existing business operators have invested significantly into the local infrastructure of the area; they were essentially leveraged to implement and construct this roundabout (at their own expense), before being able to open their own business premises. The approximate cost of the combined work to the local road network was circa €500,000.

Due regard should be given to the financial investment made by the local business owners to the local infrastructure. The existing junction functions with no issue with continuous traffic flow at this area.

Clare County Council are now proposing to remove all of this work, previously completed by the local business operators.

4.2 Planning History Adjoining Area

DOWNEY have also researched into the Planning History of the surrounding area and found the following application of relevance:

Reg. Ref. 168003: By Order dated 17th June 2016, permission was granted to Clare County Council for works to encourage walking and cycling throughout various junctions within Ennis, including the subject junction at Gort Road / Highfield Park. Figure 1 below outlines the permitted work at this junction.

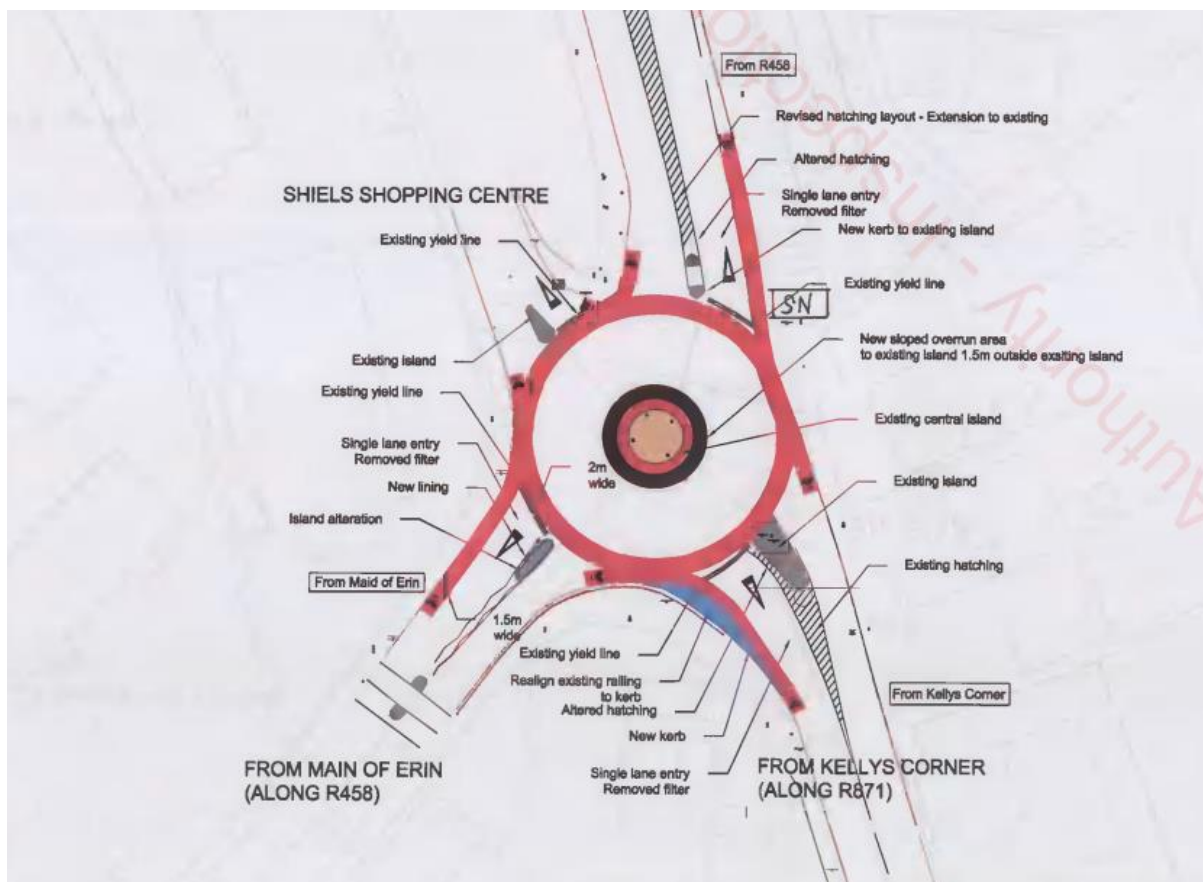


Figure 1. Works Granted under Reg. Ref. 168003

This work has never been implemented at the site which is a clear factor that such upgrade works are not required. This area is rarely used by cyclists and there is clearly no need to implement any works at this junction, at the loss of the business within the area.

4.3 Planning Policy Clare County Development Plan 2023-2029

Within the Clare County Development 2023 – 2029, the subject site is zoned 'Commercial' owing to the existing uses within the site and wider area. Within the County Development Plan, the following is stated in relation to this zoning:

“The use of land zoned for ‘commercial’ purposes shall be taken to include the use of the lands for commercial and business uses including offices, service industry, warehousing and the facilitation of enterprise/retail/office type uses as appropriate. Retail Warehousing is open for consideration under this zoning, provided that a sequential test is carried out and the lands are demonstrably the optimum location for the nature and quantum of retail development proposed.”

Within this zoning ‘Restaurant / Café’ is considered Permitted in Principle, whereas ‘Takeaway’ is Open for Consideration. The designation of this land use zoning has arisen from the existing uses within this area, all commercial units serving restaurant, retail, café, medical unit, offices, and similar which have been in operation for 20+ years at this location. As such, any future development within the area should support and protect this land use zoning. As set out in the following section, it is considered that the proposals set out within the Ennis LTP will undermine the land use zoning designation within the Clare County Development Plan.

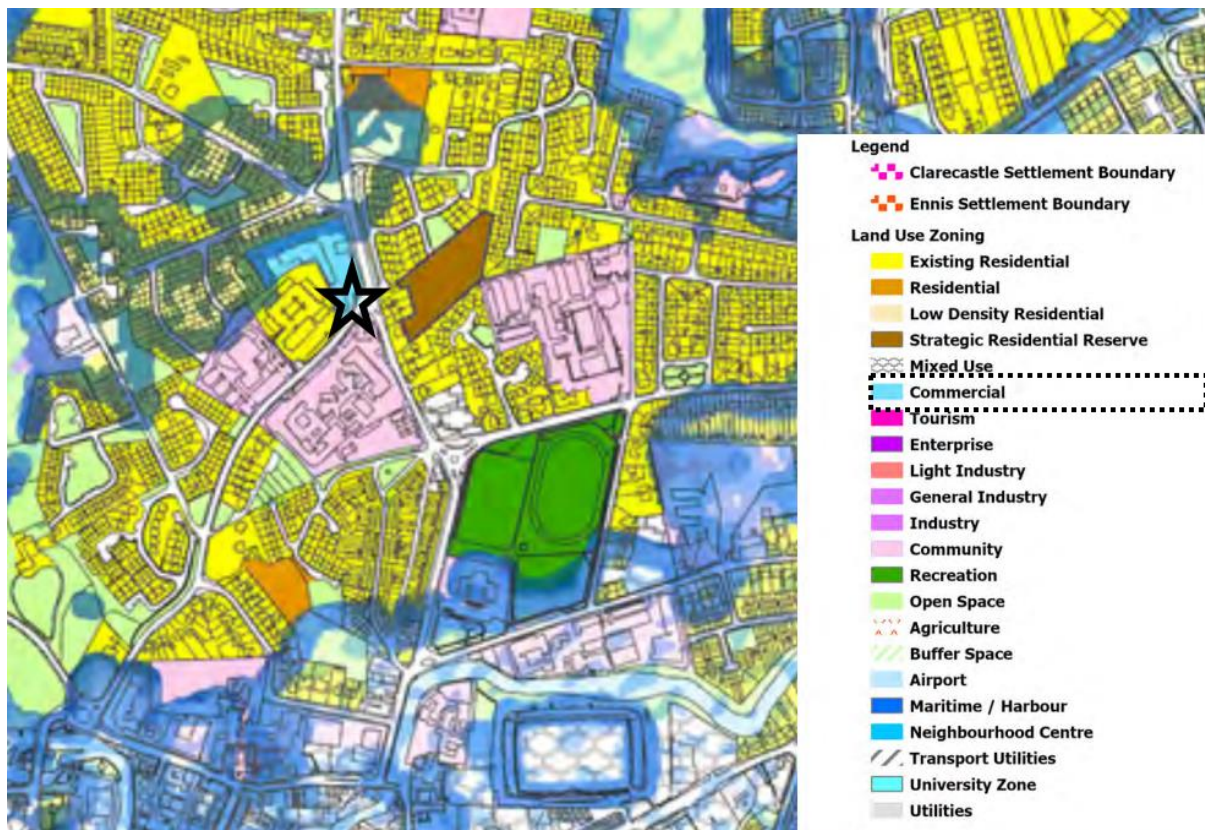


Figure 2. Land use zoning of the site (in black star) extracted from Clare County Development Plan 2023-2029

5.0 PLANNING SUBMISSION

As set out in Section 3.0 of this report, the Ennis LTP is seeking to modify the existing roundabout junction (which was built by the operators of the Elm Park Shopping Centre including our client), to turn it into a 3-arm junction, thus removing a key access point to these commercial units. Our client has serious reservations to these plans and wish to strongly object to them. As set out in Section 4.1 above, planning permission was granted to these units, only if the business operators paid for the roundabout. Clare County Council should have due regard to the financial investment made by the

local business into the local infrastructure as per the planning application approval under Reg. Ref. 0321194 / ABP Ref. PL58.211183 Reg. Ref. 0321171.

DOWNEY, on behalf of Aarval Limited, T/A McDonalds Restaurants, therefore, wish to strongly object to these proposals, for the following reasons:

5.1 Impact on Operations

DOWNEY considers the junction formed by Gort Road & Highfield Park to be a key asset towards the McDonald's drive thru business. Firstly, removing McDonald's' access road would negatively impact the business by redirecting the majority of the traffic towards a single access route. This would overcrowd the Elm Park Shopping Centre car park, now utilised by both McDonald's customers and other vehicle users attending nearby businesses. The removal of this access point will direct customers away from the McDonald's store making it harder to visit the drive-thru restaurant, given the obstacles they will have to face, particularly within the car park area, which will now become overcrowded from the intensification of the singular access point. This will have a significant impact on the local business and commercial viability of these units. These businesses are long-standing operators in Ennis, who have invested significantly into the area, while also paying the local business rates for the continued provision of their services to the residents and visitors of Ennis. In 2024, Aarval Limited, T/A McDonalds Restaurants paid €23,881.50 in annual rates, which increased to €24,449.70 in 2025. With this in mind the wider Elm Park Shopping Centre would be paying in excess of €250,000. Aarval Limited, T/A McDonalds Restaurants also employ 100 people at this premises, with the wider Elm Park Shopping Centre employing approximately 300 people in total, all adding to the commercial and economic benefit of Ennis Town. There is now a very high risk that with the loss of an existing access point to these units, that a significant loss of customers could result, thus jeopardising the operational function of these units, including our client's McDonald's restaurant who will be affected the most given its location within the shopping centre, removed from the proposed singular access. DOWNEY note that a number of the employees of this premises have their own personal reservations against the proposed plans within the Ennis LTP, which have been set out within their personal submissions to the Ennis LTP, as there is a fear that they will lose their job as a result of loss of customers from this work proposed.

DOWNEY, on behalf of Aarval Limited, T/A McDonalds Restaurants, submit that it should be the people/businesses closest to the shopping centre who should be able to decide and have a say in what is good for the area. Our client is on-location every day and as such is fully aware of the needs of this area, and the needs of the customers to this area.

On a wider scale, DOWNEY wish to advise Clare County Council that the restaurant is known to receive more than 50-60 tour buses annually, which generates significant revenue for the business. Removing the entrance to the site would disrupt the sought-out drive-thru service and completely block the ability for any tour buses to access the restaurant, resulting in a substantial loss of revenue from the restaurant's regular and broad customer base.

Should the proposals proceed, this will result in mass loss of customers visiting this commercial area, which leads to a risk of vacant units in this commercial area, undermining the established land use designations at this area. It is therefore strongly submitted to Clare County Council, that these valid commercial concerns are listened to, and that this existing junction layout remains.



Figure 3. Existing Junction and surrounding units

5.2 Traffic Implications

Following on from the above, DOWNEY on behalf of Aarval Limited, T/A McDonalds Restaurants submit that while the proposed junction upgrades may appear to be ‘traffic calming’ measures, this certainly will not be the case and will only make the traffic conditions in this area worse. Given that the proposal will remove an entire access point, this will completely restrict traffic movements within Elm Park Shopping Centre. With the wide range of commercial operators within this retail area, it is submitted that there will be significant traffic congestion within this park, with the combination of all staff, visitors, customers, and deliveries for all these units, being forced in and out of 1 no. access point. This will certainly lead to customer dissatisfaction and the risk of businesses losing clientele. The existing junction arrangement allows for continuous free flowing traffic, as is observed by our client every day on-location.

5.2.1 Existing Traffic Conditions

Secondly, businesses within Elm Park Shopping Centre rely on daily deliveries and thus need sufficient supplier access in order to provide adequate services to its visitors. McDonald’s currently receive deliveries 4-times a week to this restaurant, as well as BOC Gas deliveries, and waste disposal 4-times a week. All these deliveries occur in large 20-foot trucks, which require sufficient access and space to manoeuvre through; this is currently achievable through the existing access arrangement, however it is clear that this will not be achievable given the existing configuration within the car park needing to manoeuvre through the Circle K Petrol Station, and Elm Park Shopping Centre car park.

DOWNEY also wish to set out to Clare County Council the deliveries that occur to the other business within the area:

- Centra - Daily deliveries (peak periods see 2 deliveries a day); Wates Disposal 4 times a week. (All occurring in 20-ft trucks).

- Lana Thai Restaurant - Deliveries in and out every day.
- Pizza Shop - Daily deliveries.
- Hairdresser, Butcher, Off-License, Paddy Power, Pharmacy – Regular deliveries.
- Elm Park Medical Centre – Constant client appointments throughout the day, along with emergency services in and out of the medical centre (which could be delayed due to traffic build-up).
- Circle K petrol station - Daily petroleum deliveries, in compliance with the Dangerous Substances Regulations with 8 fuel pumps in use throughout the day.

As such, DOWNEY considers that restricting access to a single, narrow entrance, would inevitably cause operational issues for all existing and future commercial operators. This would result in further customer dissatisfaction and a potential loss of clientele for the general area. DOWNEY, on behalf of Aarval Limited, T/A McDonalds Restaurants, calls for greater consideration of the local community's voices regarding the proposed development, highlighting that it is they who rely on the existing configuration to meet their needs all year around.

5.2.2 Traffic Risks Resulting from the Proposal

The proposed development would result in a number of traffic related concerns, highlighted in the following section. The first concern regards the anticipated and aforementioned congestion caused by the single access point to the car park, limiting access to one point, as well as raising some major health and safety concerns in case of an emergency intervention. Businesses located at the back and side of the site, such as our client's site, will suffer the most from these modifications considering their strong dependence on the already existing access point located immediately beside our client's site. Therefore, imposing a single entrance and exit to these businesses' clientele would threaten the current functioning and viability of the retail park, with greater repercussions to the adjacent road traffic. Figures 4 and 5 below provide a visual representation of the traffic congestion that shall occur as a result of the proposed single access point.

Secondly, the proposed cycle lanes on Gort Road would worsen the aforementioned congestion caused by the access restriction to the retail park by further limiting the space available for cars and delivery trucks to operate on the road. Additionally, the Council's plans to introduce yet another transport mode on that road, in the form of a bus route, would likely clog traffic flows.

As such, the proposed additions in transport modes are simply incompatible with the proposed road modifications as they would lead to increased road congestion and reduced road safety. DOWNEY, on behalf of Aarval Limited, T/A McDonalds Restaurants, emphasises the importance of the current roundabout as a key element that fluidifies traffic flows in the area, and suggests a greater consideration of its role by the Council.

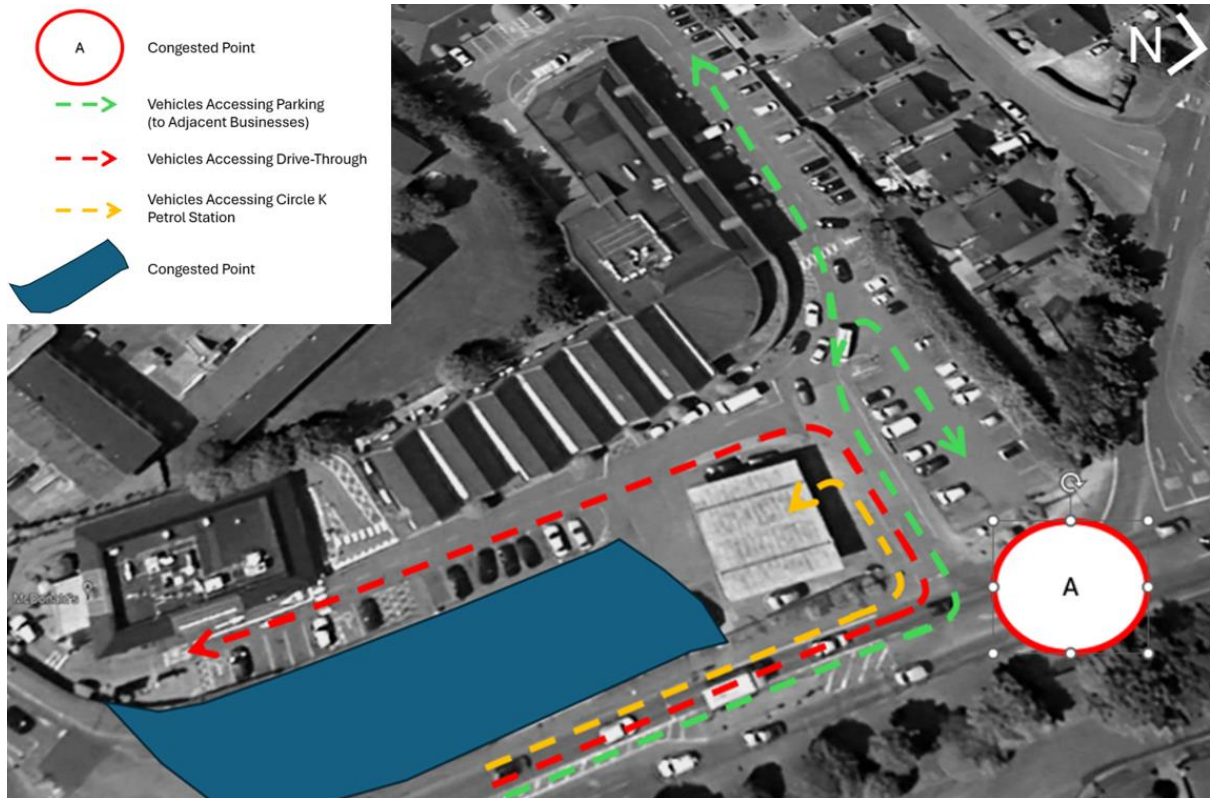


Figure 4. Congestion for Vehicles Entering

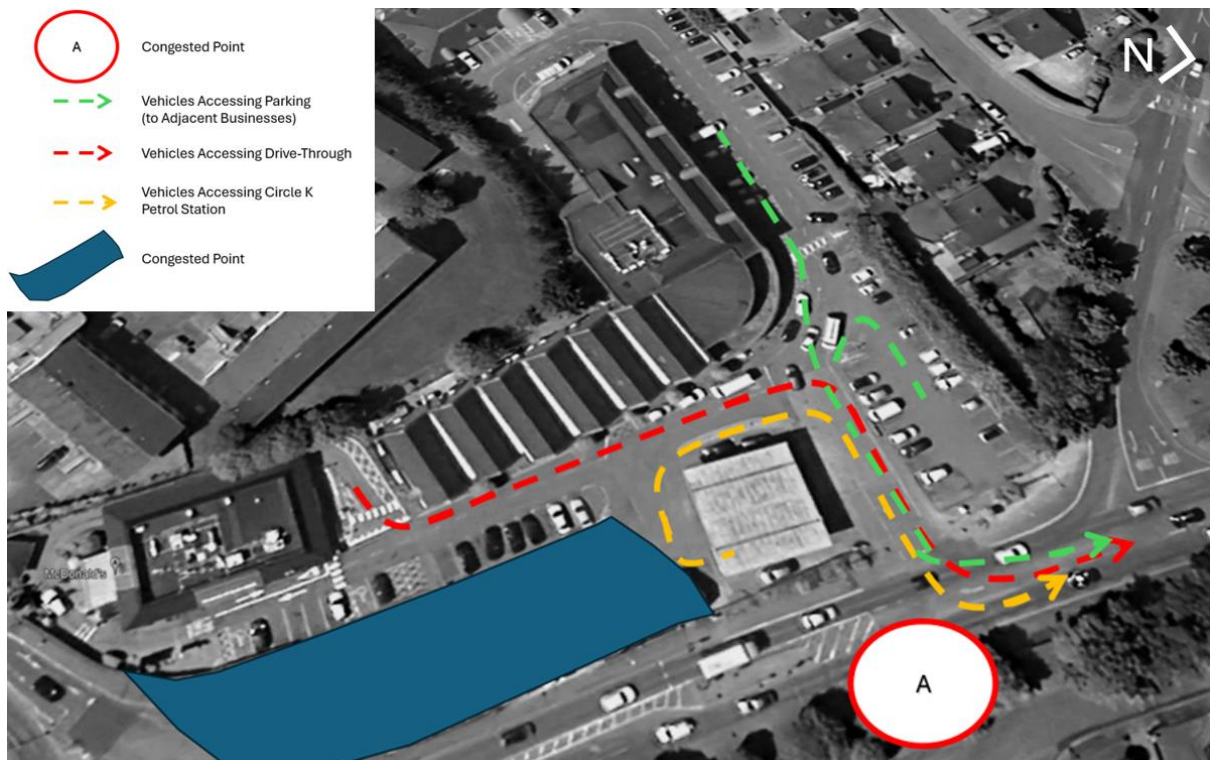


Figure 5. Congestion for Vehicles Leaving

DOWNEY also wish to invite Clare County Council to review the Letter of Submission provided by NRB Traffic Specialists, which confirms that the existing access arrangement is the most appropriate arrangement from a traffic perspective.

5.4 Health and Safety Risks

The proposed development also presents a number of health and safety risks, arising from these proposed junction upgrades. As mentioned in the previous section, combining private vehicles, buses, delivery trucks, and bicycles within a limited space, poses severe safety concerns for all road users. The existing junction arrangement as is, provides continuous free flowing movement with no current accident history at this roundabout.

Furthermore, the associated congestion generated by the mix of vehicles could present a safety risk for the greater area when it spills out onto Gort Road (see Figure 6 below). Emergency vehicles responding to an incident within the retail park or further along Gort Road would become trapped in traffic resulting from congestion generated higher up the road. In a severe case of traffic jams, the emergency vehicles may not even be able to exit/enter Ennis Hospital.

The entrance to Ennis Hospital is located only circa 110-metres from the subject junction. The existing junction layout, in the form of a roundabout, allows for continued and safe movement around this junction, with a constant flow in all directions. As such, when emergency vehicles are required to get through this junction, there will always be space and time to do so, given the continuous flow. Should Clare County Council proceed with implementing this signalised 3-arm junction, this will severely restrict, slow-down, and bring traffic to a complete standstill, resulting in emergency vehicles unable to move at all, with access completely blocked in emergency situations.

DOWNEY wish to note to Clare County Council that there have been historical instances in this store where emergency medical response has been required (as is the case in all stores of all types). Should Clare County Council implement these proposals and remove this access point, this will raise serious health and safety concerns relating to emergency response times for medical scenarios.

DOWNEY wish to stress the need for emergency vehicular access on site considering the presence of Circle K petrol station on the premises, which elevates the risk of fire related incidents. This concern is informed following various fire related incidents across different locations for similar restaurants within the Country. As such, in the interest of health and safety, the existing access arrangement should remain as is, and the existing access point to our client's store, should be kept in place to ensure appropriate emergency vehicles can be accessed quickly and efficiently.

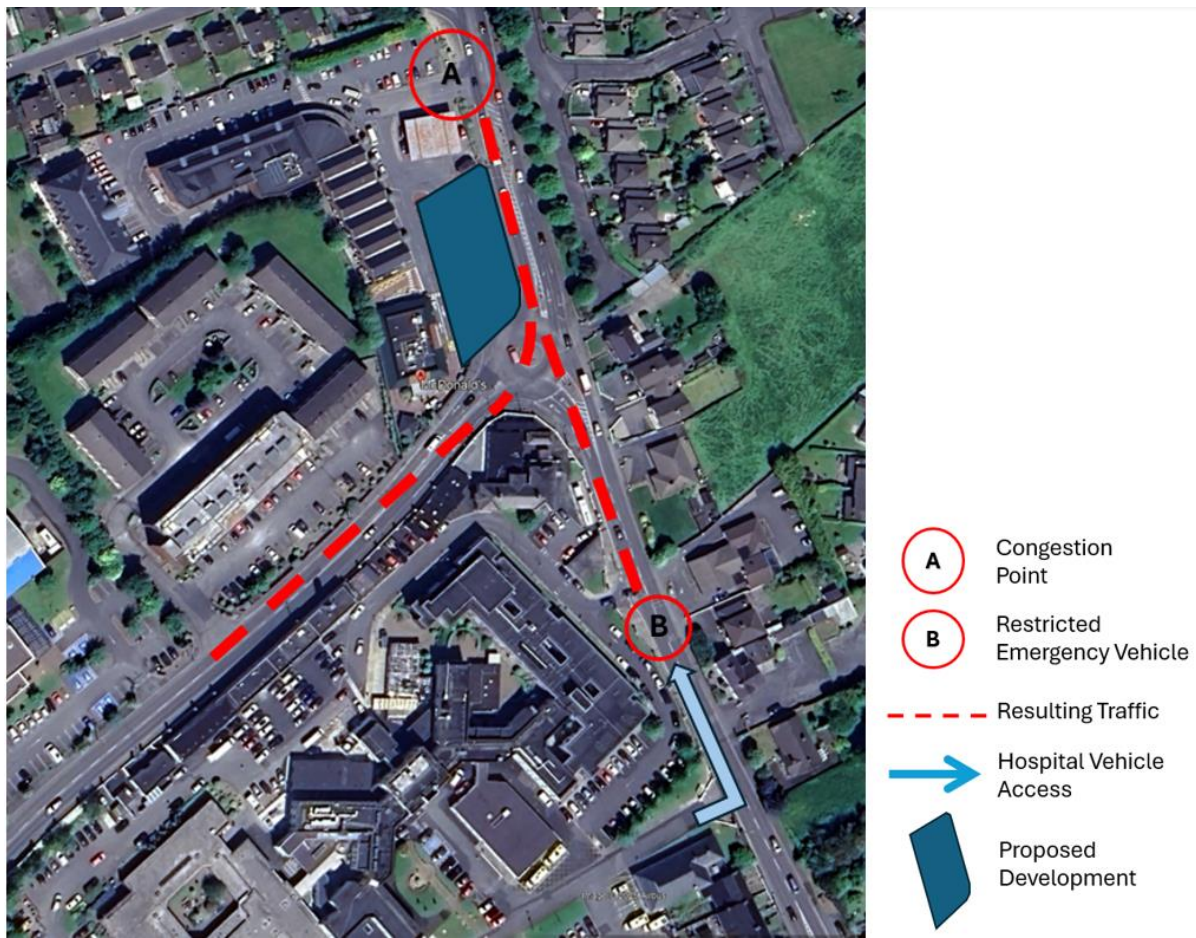


Figure 6. Likely Traffic Congestion area as a result of the signalised junction

5.5 Financial Costs

Lastly, our client has financial concerns regarding the implementation of the proposed works. As set out above, it had previously been ordered for a roundabout to be constructed as part of that McDonald's development under Condition 5 of the restaurant's parent permission, Reg. Ref. 0321194 / ABP Ref. PL58.211183, at their own expense (circa €500,000 in total). The Council's current proposal, however, is to remove the access road leading to McDonalds restaurants, from a road in which they built themselves. DOWNEY considers this proposal to undermine the time, effort and expense assembled by the developer to satisfy the Council's demands at the time.

As such, our client wishes to raise concerns in relation to the costs linked to the proposed development, particularly regarding the installation of traffic control lights to facilitate site access. Our client would also like clarity on who will pay and make good the loss that this proposal will have on the car parking spaces to the immediate front/north-east of our client's restaurant. This area provides much needed parking for the visitors to Elm Park Shopping Centre, and it is urged that this car parking area remains in place, as should the access road to the existing roundabout.

6.0 CONCLUSION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the Ennis Local Transport Plan (LTP), on behalf of our client Aarval Limited, T/A McDonalds

Restaurants, Gort Road, Ennis V95 W956. This submission relates specifically to the existing roundabout junction at Gort Road / Highfield Park and the strategic importance of it. We welcome the Plan, however serious reservations remain in relation to various aspects which will have a direct impact on the local businesses within the area.

Our client's restaurant is located immediately to the north of this roundabout and is conveniently accessed from an existing link road from the roundabout. Within the Ennis LTP, it is now proposed to remove this roundabout and the access road and instead provide a 3-arm signalised junction.

As set out above, this will have significant negative impacts on the operations and financial viability of the existing businesses within Elm Park Shopping Centre. There is a serious concern that the loss of this access road will result in the loss of significant business and revenue to not only our client's restaurant, but all businesses at this location. It is submitted that forcing all traffic through one access point will result in significant issues of traffic congestion and loss of business clientele.

Aarval Limited, T/A McDonalds Restaurants, have also engaged the services of NRB Consulting Engineers, to provide a technical traffic letter as part of this overall submission, which has been included in Appendix 1. NRB Consulting Engineers are traffic specialists and have 35+ years' experience relating to this sector. NRB Consulting Engineers have reviewed the LTP and request that the Council reconsider their proposal to close the access from Gort Road (Hospital) Roundabout owing to the very significant Traffic Safety and Traffic Capacity concerns identified, which will undoubtedly have significant consequences for McDonald's trade and associated local employment.

On behalf of our client, DOWNEY requests that Clare County Councils give due consideration to the matters set out above in the context of the current draft of Ennis LTP. It is requested that the existing junction remains as a roundabout and the existing access point to our client's restaurant remains in place, and that the Plan be amended to remove the proposal.

APPENDIX 1 – NRB TRAFFIC SPECIALIST LETTER

27 Jun 2025
25-086/B/ER

Clare County Council,
New Road,
Ennis,
Co Clare.
V95 DXP2

Dear All,

R458 GORT ROAD – ACCESS TO MCDONALDS – TRAFFIC & ROADS ISSUES

NRB Consulting Engineers are specialist in the area of Roads/Traffic/Transportation in terms of Assessment, Design and Road Safety, and we do not offer advice in other areas of Consulting Engineering. This Briefing Note, commissioned by **Aarval Limited, T/A McDonalds Restaurants**, has been prepared by Eoin Reynolds, a Chartered Engineer and founding Director of NRB Consulting Engineers Ltd. Eoin specialises in the field of Traffic & Transportation and Roads Design / Safety, generally assessing the infrastructure needs of developments.

With over 35 years of experience, Eoin is expert in the provision of advice to both private sector and public sector clients on all aspects of roads, traffic and transportation, and mobility management. Eoin is also expert in the use of Traffic Engineering Modelling Software (TRICS, ARCADY, PICADY, LINSIG, TRANSYT and Micro-Simulation Techniques). He has given expert evidence at planning appeals, oral hearings, and public enquiries, and has given Papers at Engineers Ireland on related topics.

The specific concerns relate to the importance of maintaining the current vehicular access and Servicing arrangement for the successful, safe, continued operation of the McDonalds at Gort Road, Ennis.



It arises from understandable concerns raised by the Franchisee, and in particular the intention contained within the Ennis Local Transport Plan, with the stated aim to amend the long-established vehicular access arrangement, and the impact upon the continued successful operation of the Ennis outlet, with a knock-on effect on Servicing (and with an associated resulting impact on trade and associated local employment).

The relevant Sections within the Ennis Local Transport Plan are as follows: -



Fig 1 – Extracts from Ennis Local Transport Plan

To be clear, the stated intention to close the access from the Gort Rd Hospital Roundabout will have very significant consequences for the continued safe and successful trading of the McDonalds Unit.

We set out the reasons for stating this below: -

1. Failure to Demonstrate that There is Adequate Traffic Capacity in the Gort Road Priority Access Junction in the event of Closure of the Arm from the Roundabout.

The Trip Rate Information Computer System (TRICS) database is ordinarily used to ascertain vehicular trip generation associated with the use of any particular site. This represents industry standard practice for Traffic & Transport Assessments in Ireland and is specifically referenced and recommended for use within the TII Guidelines for Traffic and Transport Assessment. In this case we have calculated the Typical Average Traffic Volumes generated by a McDonalds of this type using TRICS, in order to better inform this Note. We have used the TRICS data output for Drive Through Restaurants, and the resulting typical Average Traffic Generated by McDonalds Ennis is as set out below as **Table 1**.

Of course the Traffic Flows would likely be 15-20% greater than the average in the Table below during peak times

| TRICS TRAFFIC ASSESSMENT OF TYPICAL McDs THRU RESTAURANT | | | | | |
|--|-----------------------|------|-----------------------|------|---------------------|
| McDonalds Ennis | Arrivals (PCUs) | | Departures (PCUs) | | Total 2-Way Traffic |
| Network Period | Per 100m ² | Site | Per 100m ² | Site | |
| Weekday AM Peak Hr 8-9 | 15.570 | 70 | 14.738 | 66 | 136 |
| Weekday PM Peak Hr 5-6 | 23.424 | 105 | 22.391 | 101 | 206 |
| 24 Hour AADT | 291.647 | 1312 | 291.595 | 1312 | 2625 |

The McDonalds generates a typical average weekday 2-way flow of 136 Cars in the AM Peak Hour 8-9am, 206 Cars in the PM Peak Hour 5-6pm and a 24 Hour Annual Average Daily volume of 2,625 Cars (PCUs being car-equivalents). (And can be 15-20% more at peak).

These are in-themselves significant volumes of traffic. There is no evidence whatsoever presented that the single northern 'Centra' T-Junction access onto Gort Road (#2 below) in isolation will be able to accommodate the total volumes of traffic generated by the overall site including McDonalds, and we suggest that it will **not be capable** of doing so.



2. The Roundabout Access Currently Carries the Majority of Traffic, Allowing Unfettered Access to the Entire Site.

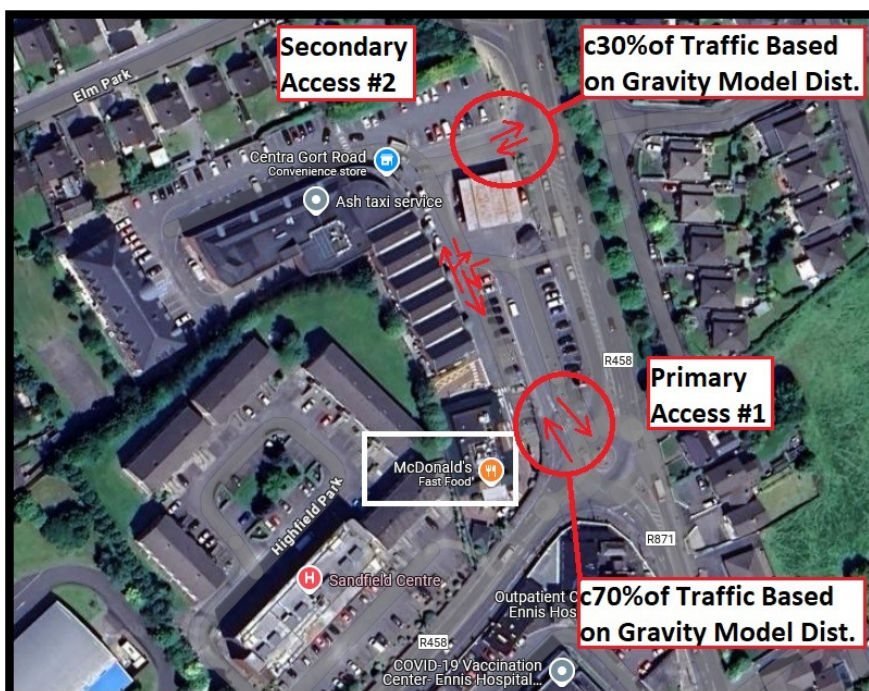


Figure 2 – Annotated Google Image Illustrating Current Traffic Distribution

We are not aware of any Traffic Modelling or Traffic Assessment undertaken by the Council or their Representatives/Consultants that confirms that there is adequate Traffic Capacity in the single Northern Junction to accommodate the entire of the traffic associated with the site.

We suggest that a single priority junction is unlikely to have sufficient traffic capacity, based on our experience.

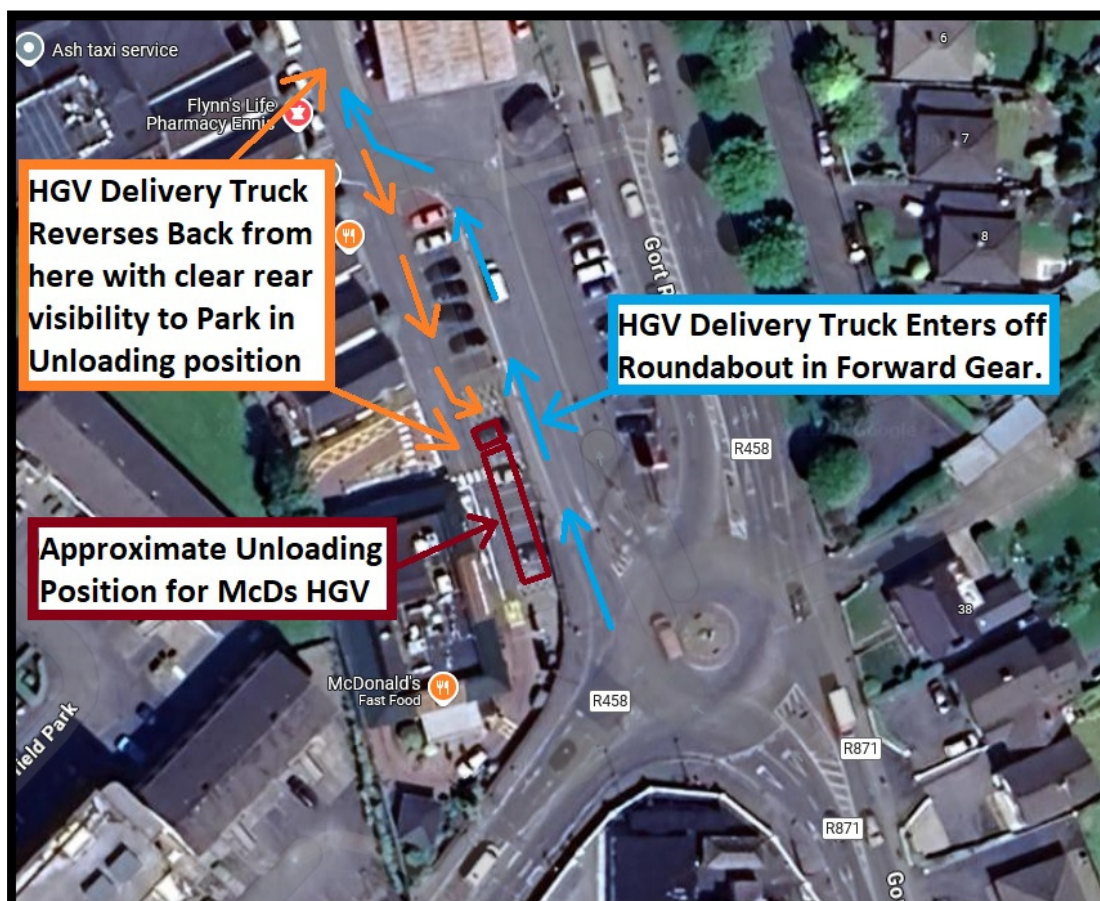
We also highlight the importance of a secondary vehicular access both in terms of DMURS and permeability, and also the safety issues and fall-back in the event of an accident, (particularly at a Petrol Station, considering what can occur within forecourts).

Notwithstanding, a significant proportion of the current McDonalds customers would likely be discommoded by any such change and the opportunity to 'impulse buy' would likely be lost in any such alternative access arrangement. A significant proportion of custom is as a result of convenience of access from the roundabout (Access #1 above).

3. Servicing and Safety / Emergency Vehicle Access.

McDonalds suppliers operate a fleet of HGVs and they make efficient use of their Service Vehicle with 3 to 4 trips per week, typically very early in the morning.

We illustrate below the current service vehicle access arrangement that has operated successfully, without incident we are advised, over many years. This is a 'tried-and-trusted' simple and safe system that has demonstrably worked well without incident or occurrence.



NRB consulting engineers

Figure 3 – Annotated Google Image Illustrating Servicing Arrangements Currently

In the event of the closure of the Access #1 from the Roundabout, HGV Deliveries by way of 16.5m articulated truck, would then be required to access from the Gort Road Junction #2 to the North, as illustrated below as **Figure 4**.

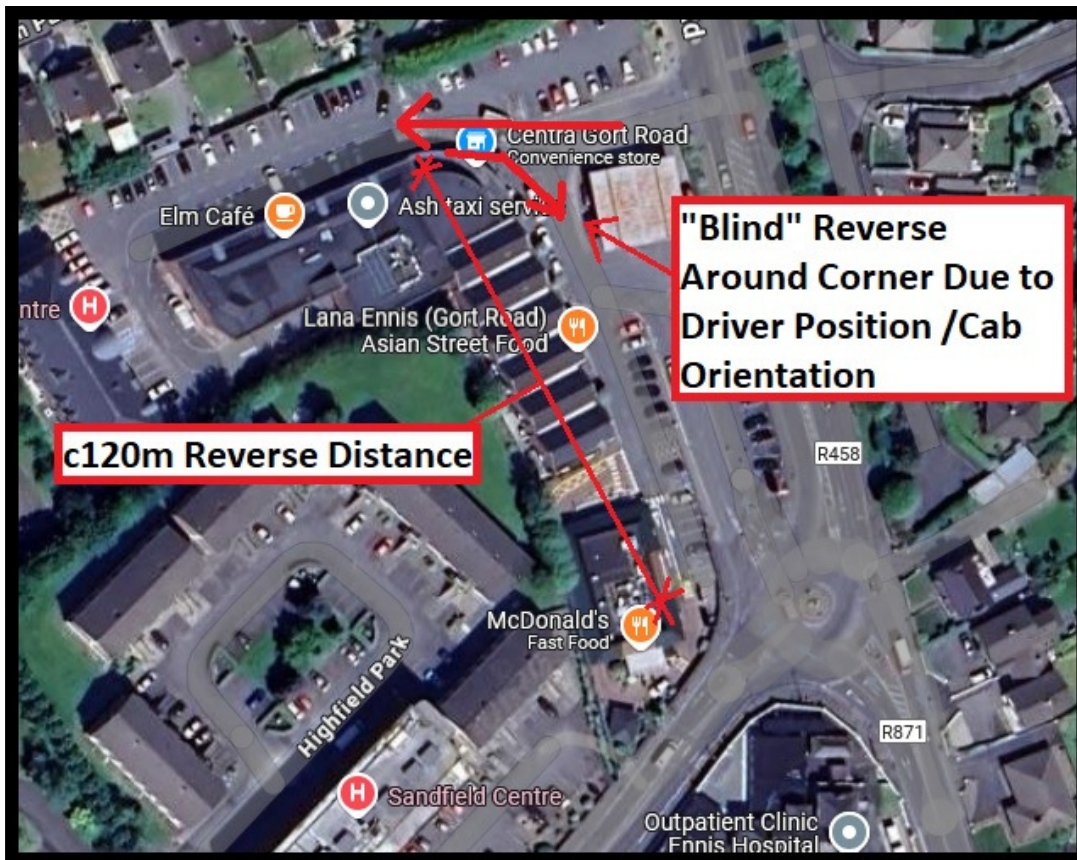


Figure 4 – Annotated Google Image Illustrating Only Possible Servicing Arrangement in the Event of Closure of Access off the Roundabout

NRB consulting engineers

In our experience, this servicing option would be unacceptable for the following reasons:

- The Creation of a 'Blind Reverse' around a corner unsighted, with the cab position rotated and the driver on the off-side, which would require a 'banksman' presence and other Health & Safety precautions, and
- An unacceptable reversing length of travel of approximately 120m (in a 16.5m long articulated lorry).

In the event of closure of the access #1 from the roundabout, access for emergency vehicles to the entire site including McDonalds (eg by Fire Tenders) would be severely restricted by traffic and congestion around the forecourt.

In **Conclusion**, we ask that Clare County Council reconsider their proposal to close the access from Gort Road (Hospital) Roundabout owing to the very significant Traffic Safety and Traffic Capacity concerns identified herein, which will undoubtedly have significant consequences for McDonalds trade and associated local employment.

Yours sincerely,

Eoin Reynolds
Chartered Engineer
Director