

**From:** [REDACTED]  
**To:** [Development Plan](#)  
**Subject:** RE: Variation No. 1 to the Clare County Development Plan 2023-2029 - KDT lands at Cahircalla More, Ennis (LT7 and Buffer Space)  
**Date:** Thursday 2 April 2026 15:02:19  
**Attachments:** [REDACTED]

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Dear Sir/Madam,

Please find attached a submission on Draft Variation No. 1 to the Clare County Development Plan 2023–2029 in respect of lands at Cahircalla More, Ennis.

This submission is made on behalf of Killaloe Diocesan Trust (KDT) and relates to the proposed inclusion of the subject lands within the Ennis settlement boundary and the Long Term Strategic Sustainable Development Site LT7, together with the proposed zoning of part of the lands as Buffer Space. While our Client supports the inclusion of the lands within LT7, it is requested that the proposed Buffer Space zoning be removed and that the full landholding be included within the LT7 designation. Our Client also requests the inclusion of additional wording to the site-specific objective for LT7 to guide the future development of the lands.

Should you require any further information or clarification in relation to this submission, please do not hesitate to contact me.

You might kindly acknowledge receipt of this submission at your earliest convenience.

Kind regards  
Mandy.

**Regards**

**Mandy Coleman | Planner**

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# “Submission to Variation No. 1 to the Clare County Development Plan 2023-2029”

Lands at Cahircalla More, Ennis, Co. Clare.

Client: Killaloe Diocesan Trust (KDT)  
 Project Number: 7670(2)  
 Issue: A

## Document Sign Off

CURRENT ISSUE			
Issue No: A	Date: 02.03.26	Reason for issue: Submission to Variation No. 1 to the Clare County Development Plan 2023-2029	
Sign Off	Originator	Checker	Approver
Print Name	Mandy Coleman	Paddy Coleman	Mandy Coleman

PREVIOUS ISSUES					
Issue No	Date	Originator	Checker	Approver	Reason for issue

# Submission to Variation No. 1 to the Clare County Development Plan 2023-2029

## 1.0 Introduction

This submission is made on behalf of Killaloe Diocesan Trust (KDT) in respect of lands at Cahircalla More, Ennis which are subject to Proposed Variation No. 1 to the Clare County Development Plan 2023–2029 (CCDP). The proposed variation includes the identification of part of these lands as Long-Term Strategic Sustainable Development Site specifically LT7 together with an area of Buffer Space zoning.

While our Client welcomes in principle the identification of these lands as forming part of a long-term strategic growth area for Ennis, serious concern arises regarding the extent and configuration of the proposed Buffer Space zoning on lands to the north adjacent to the R474 Kilmaley Road. As currently proposed, the Buffer Space zoning would significantly restrict, and possibly sterilise, the future development potential of the subject lands by cutting across the only access available to our Client from lands within their control.

It is also important to note at the outset that part of the proposed 'LT7' lands are not within our Client's ownership, as shown on Figure 1 in Appendix. We understand that the landowners of the portion of the 'LT7' lands fronting onto the N68 are not in favour of having their lands included within the 'LT7' designation and have no intention of developing those lands. That ownership context is important, as it demonstrates that access to our Client's lands cannot reasonably be assumed through adjoining lands in separate ownership.

## 2.0 Background and Planning Context

These lands have previously been the subject of submissions to the preparation of the CCDP. A submission was made on behalf of KDT seeking the inclusion of the lands within the Ennis settlement boundary and their zoning for Enterprise use in 2022. While that proposal was not recommended by the Chief Executive at the time, it was supported by the elected members and included at draft stage.

The proposed Enterprise zoning extended across the full extent of our Clients landholding and did not include the 'Buffer Space' zoning now proposed.

## 3.0 Access and Deliverability

The main concern our Client has with the current proposed zoning and designation relates to access. Our Client has an established access to these lands from the R474 Kilmaley Road. There is no access available through lands to the south towards the N85 and N68 side which is in separate ownership.

The proposed 'Buffer Space' zoning includes lands which are critical to providing access from the R474 to the wider landholding. This results in a situation where lands are identified for long-term strategic development but the practical means of accessing and delivering that development is significantly constrained.

Given that the landowners of the portion of the LT7 lands fronting onto the N68 are not in favour of having their lands included within the LT7 designation and have no intention of developing those lands, it is neither reasonable nor realistic to zone our Client's lands on the assumption that access could be achieved through adjoining lands in separate ownership where the landowners do not support the designation or intend to bring their lands forward for development.

A development plan should facilitate the orderly and sustainable development of land. Where lands are identified as forming part of a strategic growth area, the zoning framework should also allow for a practical and achievable means of access. A zoning which effectively landlocks lands or renders them dependent on third-party access arrangements is not consistent with proper planning and sustainable development.

#### **4.0 Proposed 'Buffer Space' Zoning**

We note from the Strategic Environmental Assessment prepared for this proposed variation that the proposed '*Buffer Space*' zoning is linked to environmental considerations including the proximity of Cahircalla Wood pNHA, potential Alkaline Fen habitat and landscape connectivity for bat species.

Our Client acknowledges the importance of biodiversity protection. If ecological constraints arise on part of the lands, those constraints must be properly identified and addressed. However, it is important to distinguish between the protection of clearly defined environmental features and imposing a broad '*Buffer Space*' zoning that has the practical effect of sterilising access this strategically located landholding.

It is also relevant to note that the lands proposed as '*Buffer Space*' are currently in active agricultural use and subject to daily grazing. This suggests that the lands are not presently managed or protected as a sensitive ecological habitat and reinforces the need for any environmental constraints to be clearly demonstrated and precisely defined.

The extent of the proposed '*Buffer Space*' zoning does not appear to be sufficiently justified by clearly defined site-specific information. Environmental sensitivities can often be better addressed through detailed ecological assessment, careful layout design with specific mitigation measures at development stage rather than through blanket zoning restrictions at plan-making stage.

Strategic environmental assessment is undertaken at a broad spatial scale and is intended to inform overall zoning strategy. However, it does not necessarily provide sufficient detail to justify the precise extent of restrictive zoning on individual landholdings.

Environmental issues can frequently be addressed through site-specific measures including detailed ecological surveys, retention and integration of important habitats and hedgerows, appropriate lighting design and the preparation of ecological management strategies. This approach allows biodiversity protection objectives to be achieved while ensuring that strategically important lands remain capable of development. This approach can be facilitated through a site specific zoning objective as opposed to an extensive '*Buffer Space*' zoning which may unnecessarily sterilise development potential of the overall landholding.

## 5.0 Proposed 'LT7' Site-Specific Designation

In order to address environmental considerations while also ensuring that the lands remain capable of being development, it is proposed that the proposed 'Buffer Space' zoning be removed and that the full landholding be included in the 'LT7' designation and the following text be added to the site-specific 'LT7' designation.

***Development of these lands shall be subject to the preparation of a comprehensive Masterplan. Any planning application shall include Screening for Appropriate Assessment and, where required, a Natura Impact Statement. Proposals shall include an Ecological Impact Assessment, incorporate and enhance existing hedgerows and landscape features, include appropriate lighting design having regard to potential impacts on fauna, and provide for a permeable access to include pedestrian and cycle connectivity to the R474 and the Beechpark Roundabout.***

## 6.0 Conclusion

In conclusion, while our Client supports the identification of the lands as forming part of a long-term strategic growth area, the extent of 'Buffer Space' zoning as currently proposed is considered excessive and insufficiently justified. It has the potential to undermine the only viable access available to the lands within our Client's control and risks sterilising lands that are otherwise suitable for development.

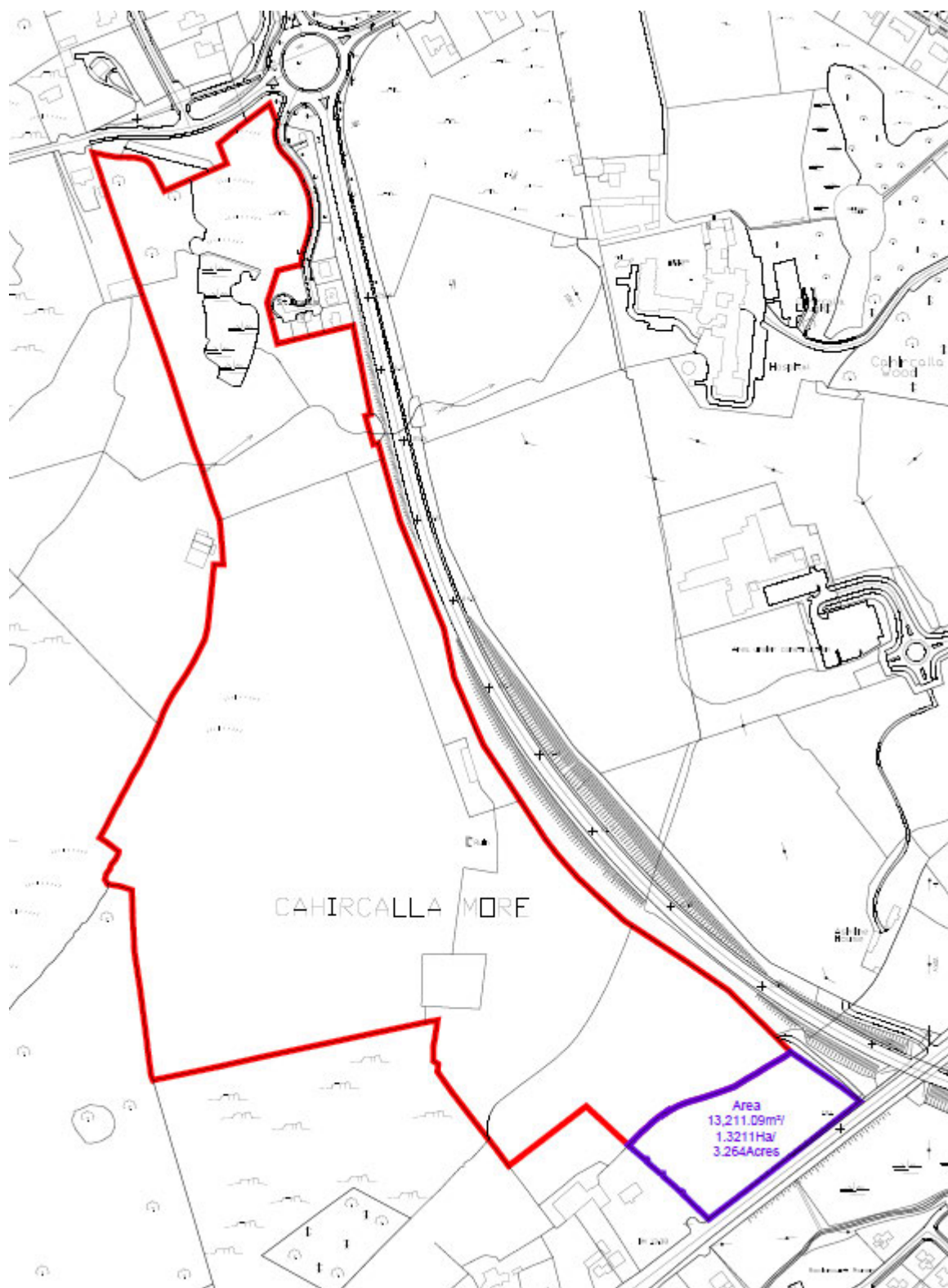
This concern is further reinforced by the fact that adjoining landowner on the N68 side is understood not to support the inclusion of their lands within the proposed 'LT7' designation and have no intention of developing their lands. It is therefore not appropriate to leave our Client's lands in a position where their future development potential is dependent on access through lands in separate ownership.

There is little planning logic in identifying lands as a long-term strategic development site if the zoning arrangement leaves those lands effectively dependent on access over lands in separate ownership. The development plan should provide a coherent framework for future growth and should not inadvertently create barriers to the implementation of that growth.

It is therefore respectfully requested that the Planning Authority review and amend the proposed zoning so as to ensure that a practical access route from the R476 can be achieved and that the lands can be brought forward for development in a coordinated and sustainable manner.

A revised zoning approach, combined with an appropriate site-specific objective requiring master planning and detailed ecological assessment, would represent a more balanced outcome and would better support the long-term growth strategy for Ennis.

## APPENDIX



**Figure 1 – Subject lands outlined in red. Lands not within our Clients ownership outlined in purple.**