

**From:** [REDACTED]  
**To:** [Development Plan](#)  
**Subject:** Variation No. 1 Clare County Development Plan\_NTA Submission  
**Date:** Thursday 2 April 2026 20:21:42  
**Attachments:** [REDACTED]

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To Planning,

Please find attached the NTA submission to the proposed Variation No. 1 of the Clare County Development Plan 2023-2029.

Kind regards,

Tanya Yeoman



EMail Signature TFI Apps



TFI website



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Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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Variation No.1 to the Clare County Development Plan 2023-2029,  
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Clare County Council,  
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2<sup>nd</sup> April 2026

**RE: Variation No. 1 Clare County Development Plan 2023-2029**

Dear Sir / Madam,

The National Transport Authority (the “NTA”) has reviewed the proposed Variation 1 of the *Clare County Development Plan 2023-2029* (CDP), which proposes to vary the CDP to, inter alia, support the implementation of the *Section 28 Guidelines on NPF Implementation: Housing Growth Requirements* (Section 28 Guidelines). Based on its role as the body responsible for public transport service planning and for funding of the national active travel programme and Local Transport Plans, the NTA submits the following observations and recommendations for the consideration of the planning authority.

**1.0 Alignment of the Ennis Local Transport Plan & Rezoning Proposals**

It is noted that Volume 3a(iv) refers to the Ennis Local Transport Plan (LTP). The NTA has worked with Clare County Council, in the preparation of the LTP and welcomes its inclusion in the proposed Variation. Given the extent of the rezonings proposed as part of the Variation, the NTA would recommend that a map is included which illustrates the LTP measures in the context of the proposed rezonings. This would clearly illustrate how the proposed rezonings are served by current and proposed transport infrastructure and would serve to usefully inform the Settlement Capacity Audit for the town.

***Recommendation***

The NTA recommends that a map is included as part of the Ennis & Clarecastle Settlement Plan which illustrates the LTP measures in the context of the proposed rezonings, in the interest of illustrating how the proposed rezonings are served by current and proposed transport infrastructure.

**2.0 Scale of Rezoning in Towns & Villages**

It is recommended that a clear rationale and justification is provided for the scale of the proposed additional zoning in towns and villages, demonstrating its consistency with Section 28 Guidelines ‘2.3 Housing Growth Requirement Additionality’, Policy and Objective 2 - ‘*additional provision*’ of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial

*Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.'*

For example, in the case of the Killaloe Municipal District Settlement Plan several 'Large Villages' including Mountshannon, Quin and Whitegate have a residential zoning allocation in this variation in excess of three times the current zoning. It is noted that Scariff/Tuamgraney will have an increased residential zoning of more than five times the current zoning.

The Shannon Municipal District Settlement Plan outlines the additional residential zoned lands for 'Large Villages' such as Ballycannon North which triples the zoned area. It is noted that provision for zoned residential land in Sixmilebridge has been quadrupled over the existing zoning.

### **Recommendation**

The NTA would recommend that the variation includes a clear rationale and justification for the zoning proposals, demonstrating its consistency with the provisions of the Section 28 Guidelines '2.3 Housing Growth Requirement Additionality', Policy and Objective 2.

### **3.0 Settlement Capacity Audits**

The NTA refers to Section 2.4 of the Section 28 Guidelines 'Tiering & Phasing of Lands' which states that:

- 'Planning authorities in all instances should prepare a 'Settlement Capacity Audit' as part of a review or variation process in line with the provisions of the "Development Plans - Guidelines for Planning Authorities" (2022), in order to both identify zoned serviced/serviceable lands, and to highlight infrastructural requirements' and
- 'the planning authority should undertake a Settlement Capacity Audit to identify zoned serviced/serviceable lands with residential development potential in all relevant settlements, specifying enabling infrastructure, for example wastewater network or treatment infrastructure, energy infrastructure, roads or public transport capacity and in the case of enabling social infrastructure, schools provision and community facilities'.

The NTA notes the inclusion of 'Settlement Capacity Audit' matrices which are included as an Appendix in each of the Settlement Plans and contain a summary assessment of the suitability of zoned sites for residential development and refer to 'Road', 'Footpath' and 'Public Transport' connections. It is the view of the NTA that this does not adequately address the requirements of the 'Settlement Capacity Audit' as set out in the Section 28 Guidelines referenced above.

The NTA is of the view that the Matrices should be amended and strengthened to more closely reflect the requirements identified above, which look to 'highlight infrastructural requirements' and to 'specify enabling infrastructure' for transport, required to service lands. Regarding Ennis, it is recommended that this should refer to the proposed transport measures, of relevance to the subject sites as identified in the Ennis Local Transport Plan and should be broadened to cover all modes of transport, including cycling, to ensure that any assessment of transport requirements is not solely focused on providing access by car.

It would appear that in all instances, the Settlement Capacity Audits state that public transport is available to all proposed rezoned land parcels. The NTA would query the criteria used in this regard. For example, the proposed Ennis R37 zoning, appears to be at least 1.2km from the nearest bus stop. While the LT7 and LT8 zonings are not currently served by public transport, nor are they proposed to be served by the Ennis Town Bus Service (proposed, nor future services).

### **NTA Recommendation**

The NTA recommends, in the interests of sustainable development and in order to avoid car dependent development, that the 'Summary Infrastructural Assessment Matrices' for each of the Settlement Plans be amended to meet the requirements of a 'Settlement Capacity Audit' as set out in Section 2.4 of the Section 28 Guidelines for Housing Growth.

### **4.0 Ennis - Specific Zonings**

There are a number of specific zonings which the NTA would highlight in regards to the provision of appropriate supporting transport infrastructure:

- Ennis LT2 – This land parcel is situated on a national road (N85), and at some remove from the town. While the LTP indicates that cycling provision will be made along the N85, it stops some way short of the proposed site. The site is not located near an existing bus stop and it is not located on the proposed town service NS2.
- Ennis LT7 & LT8 – These lands are located to the south of the N85, they are not currently served by public transport and are not located on the proposed town service routes nor the future town service route. While it is not currently served by cycling infrastructure, the southern portion of LT7 could be served by a future cycle route to Cahercalla, according to the Ennis LTP.
- Ennis R37 – This site appears to be over 1.2km from the nearest bus stop. The Ennis LTP does not include any proposed cycling infrastructure on Clonroadbeg.

### **Recommendation**

The NTA recommends that a clear demonstration should be provided as to how the above referenced sites would be served by sustainable modes of transport such as public transport, walking and cycling, with reference to the Ennis Local Transport Plan.

### **Conclusion**

I trust that the views of the NTA will be taken into account in the consideration of the proposed Variation to the Clare County Development Plan 2023-2029.

Yours sincerely,



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Owen Shinkwin  
**Senior Land Use Planner**