

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission - Proposed Variation No. 1 to the Clare County Development Plan 2023–2029
Date: Friday 3 April 2026 21:13:39

**Submission to Clare County Council
Proposed Variation No. 1 to the Clare County Development Plan 2023–2029
Re: Proposed Amendment PA3a–23a – Rezoning of Site SR8 (Pairc na Coille) to Residential (R39)**

1. Introduction

This submission relates to the proposed rezoning of Site SR8 (Pairc na Coille, Drumbiggle, Ennis) from Strategic Residential Reserve to Residential.

The focus of this submission is on the **ecological sensitivity of the site**, with particular regard to the **recorded presence of the Lesser Horseshoe Bat** and the implications of rezoning in the context of:

- Clare County Council’s own Biodiversity Action Plan (2025–2031)
 - The Lesser Horseshoe Bat Species Action Plan (2022–2026)
 - Statutory protection under the European Communities (Birds and Natural Habitats) Regulations 2011
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2. Established Ecological Constraints

It is noted that:

- The Lesser Horseshoe Bat has been **recorded on the subject site**
- This appears to be **the only site currently proposed for residential zoning in County Clare where this species has been identified**
- Previous planning decisions relating to the site identified the **potential for net loss of foraging habitat for this species**

The presence of a strictly protected species represents a **significant and material constraint** which should be addressed at plan-making stage.

3. Policy Conflict – Clare County Biodiversity Action Plan 2025–2031

The Clare County Biodiversity Action Plan explicitly recognises:

- The existence of a **biodiversity emergency**
- The need to **halt biodiversity loss and protect habitats**

The Plan sets out a framework for:

- Protecting ecological networks
- Conserving key habitats and species
- Integrating biodiversity considerations into decision-making

The proposed rezoning of a **mature woodland site with known ecological value** is difficult to reconcile with these stated objectives.

In particular, the proposal appears inconsistent with:

- The precautionary approach to habitat protection
- The commitment to avoid further biodiversity loss

4. Species-Specific Considerations – Lesser Horseshoe Bat

The Lesser Horseshoe Bat Species Action Plan highlights a number of key ecological requirements:

- Dependence on **broadleaf woodland and structurally diverse habitats** for foraging
- Reliance on **linear landscape features (hedgerows, treelines)** for navigation
- Sensitivity to **habitat fragmentation and artificial lighting**
- Limited range of movement, requiring **local habitat continuity**

The characteristics of the Pairc na Coille site — including woodland cover and connectivity — are consistent with these requirements.

Residential development would likely result in:

- Reduction in suitable foraging habitat
- Fragmentation of ecological corridors
- Increased disturbance from lighting and human activity

These impacts would be directly contrary to the conservation objectives set out in the Species Action Plan.

5. Legal Context – Protected Species and Habitat

The Lesser Horseshoe Bat is protected under the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011).

This protection extends to:

- Breeding and resting places
- **Foraging habitats and commuting routes**

Any plan or project that would result in deterioration of such habitat must be carefully assessed and justified.

Rezoning land in a manner that facilitates development with a **likely adverse impact on a protected species' habitat raises significant compliance issues at plan-making stage.**

6. Consistency with Previous Planning Decisions

Previous planning assessments relating to this site identified:

- The **risk of net loss of foraging habitat for the Lesser Horseshoe Bat**

There is no evidence of any material change in ecological conditions since those assessments.

Accordingly, the proposed rezoning appears **inconsistent with the Planning Authority's previous findings** regarding the suitability of the site for development.

7. Site-Specific Sensitivity

It is acknowledged that the proposed variation seeks to address broader housing supply objectives.

However, Site SR8 is not directly comparable to other Strategic Residential lands due to:

- Confirmed ecological sensitivity
- Presence of a protected species
- Existing woodland habitat
- Previous planning concerns

A blanket approach to rezoning does not appear appropriate in this context.

8. Conclusion and Recommendation

In light of the above, it is considered that the proposed rezoning of Site SR8 to Residential (R39):

- Is not supported by adequate ecological assessment at plan-making stage
- Conflicts with Clare County Council's own biodiversity policy framework
- Is inconsistent with species-specific conservation objectives
- Raises potential issues in relation to compliance with habitat protection legislation

It is therefore recommended that:

- The proposed rezoning be **reconsidered**, and

- The ecological function of the site be recognised through an alternative zoning objective, such as **open space, buffer space, or environmental protection**
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Regards,

Seán Connolly, 