

From: [REDACTED]
To: [Development Plan](#)
Subject: Proposed Variation No.1 to the Clare County Development Plan, 2023 - 2029
Date: Saturday 4 April 2026 14:41:37
Attachments: [Proposed Variation No.1 to the Clare County Development Plan 2023 - 2029.pdf](#)

TII ref. TII26-135558

Dear Sir / Madam,

Please find attached a copy of TII observations on Proposed Variation No.1 to the Clare County Development Plan, 2023 – 2029.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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Planning Department
Clare County Council
New Road
Ennis
Co Clare
V95 DXP2

by e.mail; devplan@clarecoco.ie

Dáta | Date

4 April 2026

Ár dTag | Our Ref.

TII26-135558

Bhur dTag | Your Ref.

Re: Proposed Variation No.1 to the Clare County Development Plan, 2023 - 2029

Dear Sir / Madam,

Transport Infrastructure Ireland (TII) welcomes consultation on Proposed Variation No.1 to the Clare County Development Plan, 2023 - 2029, and provides the following observations for the Councils consideration.

TII acknowledges that the proposed variation includes proposals, inter alia, to align the Clare County Development Plan, 2023 – 2029, with the NPF Implementation: Housing Growth Requirement Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act 2000, as amended (2025). To that effect, TII provides the following observations for the Councils consideration in the assessment of the Proposed Variation.

1. Volume 3 a (i); Ennis and Clarecastle Settlement Plan

a) Proposed Amendment No. 3a – 16; Claureen Neighbourhood Map

TII notes proposals included in Proposed Amendment No. 3a – 16 (Claureen Neighbourhood Map) to change zoning of Agriculture land to Long Term Strategic Development Site (LT2). Proposed Amendment No. 3a – 36 also relates.

According to TII's records, the lands subject to Proposed Amendments No. 3a – 16 and No. 3a - 36 adjoin the N85, national road, at a location where a 100kph speed limit applies.

The DoECLG Spatial Planning and National Roads Guidelines emphasise the critical importance of ensuring high standards of road safety on national roads which is addressed by managing access and intensification of access to national roads and guarding against a proliferation of roadside development accessing national roads to which speed limits greater than 50 – 60kmh apply.

The Guidelines also require that the policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply. This provision, it is stated, applies to all categories of development.



In that regard, the Proposed Amendments No. 3a – 16 and No. 3a - 36 on lands adjoining the N85, national road, at a location where a 100kph speed limit applies appear to conflict directly with the provisions and requirements of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012), as well as Objective CDP 11.13 of the adopted County Development Plan, 2023 – 2029, Regional Policy Objective 140 and NPF National Strategic Outcome no. 2.

TII recommends that the Council not proceed with the Proposed Variation with respect to the subject lands pending clarification that access to the lands concerned can be provided in a manner consistent with the foregoing provisions of official policy and the safety of all road users.

b) Proposed Amendment No. 3a – 18; Cahircalla More Neighbourhood Map

TII notes proposals included in Proposed Amendment No. 3a – 18 (Cahircalla More Neighbourhood Map) to change zoning of Strategic Residential Reserve (SR3) to Long Term Strategic and Sustainable Development Site (LT6). Proposed Amendment No. 3a – 18c refers.

Proposed Amendment PA3a – 19a also proposes amendment to lands in the Cahircalla More Neighbourhood concerning future residential lands (R29 and R30 Ashline).

While Section 6.7 of the proposed Local Transport Plan (Volume 3 a (iv) of the Proposed Variation) discusses access to the subject lands, TII considers that it is critical that careful consideration is given to access proposals to the R474 (Circular Road) given the vicinity of the proposed development lands to the N85 Beechpark Roundabout and that robust assessment of development proposals will be required to demonstrate the optimal location for access to the development lands which, in TII’s opinion, should be at the greatest remove from the N85 Beechpark Roundabout junction.

TII would welcome such clarification provided in the Proposed Variation prior to finalisation.

c) Proposed Amendment No. 3a – 32; to Ennis and Clarecastle Settlement Map 3

TII notes proposals included in Proposed Amendment No. 3a – 32 (Clarecastle Settlement Map) to identify Long Term Strategic and Sustainable Development Sites (LT7 and LT8) and amend the settlement boundary accordingly (Amendments PA3a – 31a and PA3a – 32a also refer).

The text associated with PA3a – 31a outlines,

‘These Long Term Sustainable Development Sites are suitable for the provision of a high quality residential development and a potential healthcare facility. Development of these lands, shall be guided by a comprehensive masterplan.’

The subject lands adjoin the N85, national road and are situated between the R374 in the vicinity of the Beechpark Roundabout and the N68, Kilrush Road.

Section 2.7 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012), requires that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.

The Guidelines require that planning authorities must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

In that regard, TII is not aware of any evidence base established to demonstrate that the development of the subject lands can be catered for on the existing national road network and that the capacity and efficiency of the national road network and associated junctions will not be compromised.

In addition, having regard to the site locations, it would appear that serving the lands with active travel and sustainable mobility measures would be challenging and such is not supported in the Councils Local Transport Plan included in Volume 3 a (iv) of this Proposed Variation to the Development Plan. Therefore, it is also not demonstrated that the lands support compact growth and sustainable mobility principles of official policy.

In Development Plan submissions concerning this area, TII previously identified the potential for development objectives, individually and in combination, to adversely affect the operation of the national road and associated junctions in the Ennis area if the cumulative impact of development is not planned for and co-ordinated with required infrastructure improvements to safeguard sufficient capacity on the strategic national road network. In that context, it is worth noting, TII identified Beechpark as an example and Objectives ENT1/TOU2 included in the Ennis Settlement Plan.

Further zonings, such as those proposed with Objective LT7 and LT8, in the absence of any evidence base, in TII's opinion do not demonstrate adherence to the requirements of Section 2.7 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

In relation to the text associated with Proposed Amendment No. 3a – 31a that development of these lands shall be guided by a comprehensive masterplan, TII considers that such an approach to be inappropriate as no details are provided in relation to the preparation of a masterplan, proposals for consultation nor mechanisms for adoption.

The Council will be aware that official policy provides that where a masterplan is to be relied upon for development management functions it should include public consultation and be incorporated into the relevant Development/Statutory Area Plan by way of variation or amendment.

2. Volume 3 a (ii); Ennis Municipal District Settlement Plans

Proposed Amendment No. 3a – 45 – Barefield

TII notes proposals included in Proposed Amendment No. 3a – 45 (Barefield Settlement Map) includes a number of objectives to designate unzoned land to Village Growth Area; Amendments PA 3a – 45a, PA 3a – 45b, PA 3a – 45c, PA 3a – 45d and PA 3a – 45e all refer.

Barefield adjoins M18 Junction 14, and as noted above, the DoECLG Guidelines require that planning authorities must make sure that development proposals, such as the zoning of lands, can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

TII is not aware of any evidence base developed to support the proposed designations nor to assess the impacts to the adjoining national road junction. Having regard to the rural location of the subject sites and the limited services available in Barefield, it appears likely that trips generated may predominantly be private car. Such an approach does not appear to support compact growth, sustainable mobility and safeguarding the strategic function of the national road network in the area. TII recommends the Council review the zoning proposals in the context of the foregoing prior to adoption.

3. Volume 3 a (iii); Ennis 2040 An Economic and Spatial Strategy

TII notes that Volume 3 a (iii) of the Proposed Variation includes '*Ennis 2040 An Economic and Spatial Strategy*'. The Strategy includes a number of provisions that impact the strategic national road network in the area, however, TII has no record of consultation and TII is not aware of any integrated land use and transport analysis or evidence base prepared to support the measures impacting the strategic national road network identified in the Strategy. The following observations are outlined for the Councils review in the assessment of the subject Variation;

a) Ennis Northern Bypass

Within the Section of the Strategy titled '*Development of a Coherent Roads and Street Hierarchy*' a proposal for a Northern Bypass is identified and the associated text outlines

'Whilst it is not envisioned that it will be required in the lifetime of the Ennis 2040 strategy, it is recommended that a corridor be reserved for the completion of the Ennis bypass connecting the N85 Roundabout on the Lahinch Road to the M18 intersection with the R458 at Barefield'.

Associated Map reference '*Map 6 Roads and Street Hierarchy*' indicatively indicates a northern bypass, however, this indicates a link to Junction 13 and not to the M18 intersection with the R458 at Barefield, i.e. M18 Junction 14, as outlined in the text.

Notwithstanding, any additional connectivity to the national road network in the manner proposed will require demonstration of compliance with Section 2.7 of the Section 28 Ministerial Guidelines '*Spatial Planning and National Roads Guidelines for Planning Authorities*' (DoECLG, 2012). As noted above, TII is not aware of any proposals prepared in relation to this requirement.

TII also notes that such road proposals are not included in the evidence based Local Transport Plan included in Volume 3 a (iv) of the Proposed Variation and therefore, do not appear to represent a plan led approach to land use and transport integration in Ennis.

b) Wetlands and Enterprise Area Transformational Project

Text associated with the Wetlands and Enterprise Area outlines that the site presents an opportunity for the development of a modern Enterprise Zone along the eastern boundary of the Wetlands area, and, enterprise zones alongside new junction to M18, incorporating light industry, business hubs, and enterprise uses.

A number of indicative road proposals are also identified in the area which impact the national road network including the Skehanagh Arterial Road, connecting Skehanagh Roundabout (N85) to the Quin Road (R469), and an upgrade of the R469 and a new junction onto M18 from R569 creating a new connection to the M18.

TII has previously outlined observations in relation to such additional connectivity to the national road network in previous Development Plan submissions and the observations previously made remain the position of the Authority, as follows;

In relation to the proposal for an additional junction on the M18 at Quin Road (R469), Ennis; the proposed additional connectivity to the M18 at this location is not consistent with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines and would require a Motorway Order. As previously advised, TII has no knowledge of such a proposal and has not been consulted with respect to this objective which will have serious impacts on the safety, efficiency and maintenance of the motorway. TII does not support its inclusion in the Development Plan.

Proposals for any Skehanagh Arterial Road, connecting Skehanagh Roundabout (N85) to the Quin Road (R469), would also require an evidence based assessment in adherence with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

In relation to proposals for enterprise zones, light industry, business hubs and enterprise uses, etc. as well as proposals for new road connectivity on lands in the vicinity of the national road network, TII is of the opinion that a plan led approach is critical in advance of any development proposals progressing. Such a plan-led approach should include addressing the requirements of Section 2.7 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and include consultation and proposals for incorporation into the adopted Development Plan where such is proposed to inform development management and future consents for infrastructure improvements to facilitate development.

Having regard to the nature and location of development proposals, TII considers that any evidence base developed should be supported by Area Based Transport Assessment. It is noted that the subject lands have not been incorporated into the Ennis Local Transport Plan.

Volume 3 a (i); Ennis and Clarecastle Settlement Plan of the Proposed Variation should also be reviewed to ensure consistency with the foregoing where proposed Transformational Sites are included in the Ennis Settlement Plan.

c) Data Centre (Toureen) Transformational Project

In relation to the Data Centre transformational site at Toureen adjacent M18 Junction 13, TII acknowledges that this site and land use was subject to a plan-led designation incorporated into the Development Plan previously. TII is concerned that the text included in the Strategy in relation to this site, which outlines an approach to promote technological entrepreneurship across a range of activities could result in a demand for a range of development proposals not initially envisaged to be accommodated at this location and not assessed as part of the evidence base prepared to support the zoning designation adjoining M18 Junction 13.

TII would welcome clarification provided within the Strategy that only land uses associated with Data Centre development are proposed to be accommodated at this site. Any uses that result in a greater trip generation or intensity than a data centre development has not been subject to an evidence-based analysis to demonstrate that the junction has capacity for such development or that such development can be accommodated without compromising junction performance and safety.

4. Volume 3 a (iv); Ennis Local Transport Plan

a) 'Section 6.7 Connections to Future Zoned Land'

Text included in the Local Transport Plan concerning access to Cahercalla More and Circular Road future zoned lands outlines that road infrastructure for these lands is indicated in the County Development Plan via new accesses to the Ashline Roundabout, to Cahercalla using the private Cahercalla Hospital Road (this would require third party agreement) and via a new access point to the Circular Road 100m east of the N85 Beechpark Roundabout.

TII welcomes that the Local Transport Plan acknowledges that depending on traffic movements on the N85 there may be potential need to address congestion on the Rocky Road Roundabout.

TII also considers that it is critical that careful consideration is given to access proposals to the R474 (Circular Road) given the vicinity of the proposed development lands to the N85 Beechpark Roundabout and that robust assessment of development proposals will be

required to demonstrate the optimal location for access to the development lands which, in TII's opinion, should be at the greatest remove from the N85 Beechpark Roundabout junction.

TII would welcome such clarification provided in the Local Transport Plan prior to finalisation as part of the subject Variation.

b) Measure R1: Skehenagh Roundabout (N85) to Quin Road (R469)

Observations in relation to Measure R1 Skehenagh Roundabout (N85) to Quin Road (R469) are outlined above in Section 3 (b) and remain the position of TII. As previously outlined in observations on the Draft Local Transport Plan, consultation with TII in relation to specific proposals with the potential to impact the national road network should continue.

5. Volume 3 (d); West Clare Municipal District Settlement Plans

Volume 3 (d) of the Proposed Variation includes a number of proposed zoning alterations in West Clare settlements. The N67, N68 and N85, national secondary roads, provide important regional links to/from and within West Clare. In accordance with Government policy, it is critical that the national road network is safeguarded to fulfil its strategic economic function and to provide a robust and safe network for road users and communities served.

As previously outlined, the DoECLG Spatial Planning and National Roads Guidelines also emphasise the critical importance of ensuring high standards of road safety on national roads which is addressed by managing access, managing the increased use of existing direct access to national roads and guarding against a proliferation of roadside development accessing national roads to which speed limits greater than 50 – 60kmh apply.

Aligning development objectives and development boundaries to ensure planned development occurs in a manner consistent with and complementary to safeguarding the strategic function and safety of national roads is a critical requirement to ensure the provisions of the DoECLG Spatial Planning and National Roads Guidelines are reflected in the Development Plan and the Proposed Variation.

In that regard, a number of Proposed Zoning Alterations included in Settlement Plans in the West Clare area have been identified in Proposed Variation no. 1 that TII considers should be subject to review or clarification to demonstrate compliance with the DoECLG Spatial Planning and National Roads Guidelines.

The Settlement Plans and lands concerned subject to the Proposed Variation all relate to lands that adjoin the strategic national road network at locations, according to TII records, outside where the reduced urban 50 – 60kph speed limit applies, and are as follows;

Lisdoonvarna Settlement Plan

- PA 3d – 11a; To change Strategic Residential Reserve (SR2) to Residential (R7)
- PA 3d – 11d; To change Strategic Residential Reserve (SR1) to Residential (R5)

Doonbeg Settlement Plan

- PA 3d – 19d; To change Tourism site (TOU1) to Residential (R7)

Killimer Settlement Plan

- PA 3d – 31a; To change unzoned lands to Residential (R3) and extend settlement boundary accordingly.

Lissycasey Settlement Plan

- PA 3d – 55a; To change zoned Agricultural land (AG3) to Village Growth Area (VGA4)

In TII's opinion, the identification of such lands in Lisdoonvarna, Doonbeg, Killimer and Lissycasey, for development in the manner proposed, conflict with official policy having regard to access requirements to national roads at locations outside where 50 – 60kph speed limits apply.

In addition, TII considers the identification of such lands for development accessing a national road in the manner proposed conflict with Objective CDP 11.13 of the adopted County Development Plan, 2023 – 2029, Regional Policy Objective 140 and NPF National Strategic Outcome no. 2.

Accordingly, TII recommends that the Council not proceed with the Proposed Variations with respect to the subject lands identified above, pending clarification that access to the lands concerned can be provided in a manner consistent with the foregoing provisions of official policy and the safety of all road users.

Conclusion

The Authority respectfully requests that the foregoing observations are taken into consideration and, where appropriate, addressed and resolved by the Council in the assessment and consideration of Proposed Variation No.1 to the Clare County Development Plan, 2023 – 2029, prior to finalisation.

Yours faithfully,



Michael McCormack
Senior Land Use Planner