

From: [REDACTED]
To: [Development Plan](#)
Cc: [REDACTED]
Subject: Submission to Variation No. 1 to the Clare County Development Plan 2023-2029 by Sixmilebridge Town Team.
Date: Monday 6 April 2026 17:56:12
Attachments: [image.png](#)
[SixmilebridgeTownTeamVariationNo.1-CoverLetter.docx](#)
[SixmilebridgeTownTeamVariationsNo.1-Observations.docx](#)

To The Development Plan Team

Please find attached two documents...

- 1) Cover letter
- 2) Observations

An acknowledgement by email that these have been received and will be processed, would be appreciated for our Town Team records.

Kind regards

Colette Myler
Company Secretary, Sixmilebridge Town Team (STT)
Email - [REDACTED]
Mobile - [REDACTED]



Please note that The Town Team cannot guarantee that any personal and sensitive data, sent in plain text via standard email, is fully secure. Should you choose this channel, you are deemed to have accepted any risk involved. The alternative communication methods offered by The Town Team include telephone and standard post.



C/O Bowen & Co. Solicitors, Pound Street, Sixmilebridge, County Clare, V95 Y2XD

Submission to Variation No. 1 to the Clare County Development Plan 2023-2029
Planning Department
Clare County Council
New Road
Ennis
County Clare
V95 DXP2, Ireland

Monday 6th April 2026

Re: Submission by Sixmilebridge Town Team on Proposed Variation No. 1 to the Clare County Development Plan 2023-2029

**Volume 3B - Shannon Municipal District Settlement Plans
Sixmilebridge**

Dear Development Plan Office,

We, the Directors and Officers, write on behalf of **Sixmilebridge Town Team**, which represents the views and interests of the local community, to highlight our position in relation to the Proposed Variation No. 1 for the Clare County Development Plan 2023-2029, insofar as it affects Sixmilebridge.

The Sixmilebridge Town Team comprises nineteen members, listed as follows, and we collectively make this submission.

Directors (D) & Officers (O)

Chairperson – D&O, PJ Ryan
Company Secretary- D&O, Colette Myler
Treasurer-D&O, Eileen Moloney
Public Relations Officer-D&O, Marc Noonan

Company Name: Sixmilebridge Town Team CLG.

Address: [REDACTED]

Phone: [REDACTED]

Email: [REDACTED]
Website: www.sixmilebridgetown.ie

Social Media: SmbTownTeam

Company Registration Office (CRO) No: 757364



C/O Bowen & Co. Solicitors, Pound Street, Sixmilebridge, County Clare, V95 Y2XD

List of Directors, Officers and Town Team Members.

No.	First name	Surname	Interest as per Themes and Objectives of Town Centre First Plan, June 2023
1	Bridget	Madden	Enterprise & Visitor Experience
2	Carmel	McElligott	Local Community
3	Colette	Myler	Company Secretary - Accessibility
4	Corey	Downes	Sustainable Environment, Movement, Youth & Community
5	Eileen	Moloney	Treasurer - Enterprise & Sustainable Growth
6	Eilis	O'Nuallain	Sustainable Environment, Movement & Visitor Experience
7	Eoin	Harrington	Local Community & Heritage
8	Gwen	Bowen	Enterprise & Sustainable Growth
9	Helen	Quane	Youth & Local Community
10	John	Barry	Identity, Enterprise, Local Community & Visitor Experience
11	John	Crowe	Local Councillor Representative
12	Kate	Reddan	Enterprise, Local Community & Visitor Experience
13	Laura	Hogan	Enterprise & Sustainable Growth
14	Margot	Healy	Sustainable Environment, Movement & Community
15	Marc	Noonan	Public Relations , Identity, Youth & Local Community
16	Michael	McNamara	Heritage & Local Community
17	PJ	Ryan	Chairperson – Sustainable Environment, Movement, Local Community, Enterprise & Sustainable Growth
18	Tom	Hogan	Enterprise & Sustainable Growth
19	Yvonne	Keogh	Youth & Local Community

We ask Clare County Council to consider the points presented and ensure that the final variation gives strong recognition to the need for enhanced infrastructure and services in Sixmilebridge and to the principle that these should be in place, in advance of further substantial planning permissions. We request effort be made to ensure the town grows as a **Sustainable Small Historic Town**.

Yours sincerely

Colette Myler
Company Secretary, On behalf of the Sixmilebridge Town Team Members.

Directors (D) & Officers (O)

Chairperson – D&O, PJ Ryan
Company Secretary- D&O, Colette Myler
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**Sixmilebridge Town Team Observations
Monday 6th April 2026**

On

**Proposed Variation No. 1 to Clare County
Council Development Plan (2023-2029)**

Volume 1, Written Statement

&

**Volume 3b, Shannon Municipal District
Settlement Plans**

Observations

Our observations relate to the above, with particular reference to PA 3b-1a, PA 3b-3a-3g inclusive, PA3b-4a-4g inclusive, PA 3b-A1-9, PA 3b A1-10



INTRODUCTION

We write on behalf of Sixmilebridge Town Team, which represents the views and interests of the local community, to make a submission in relation to Proposed Variation No. 1 to the Clare County Development Plan 2023-2029 insofar as it affects Sixmilebridge. We want to outline a number of genuine and considered concerns in relation to the proposed variation. Our core concern: **the capacity of the village to absorb additional development must be judged not only by land availability or settlement policy, but by whether the supporting infrastructure, public services and local facilities are in place, or are guaranteed to be delivered, before further permissions are granted.**

At the outset we would like to state that the Sixmilebridge Town Team supports the principle of appropriate and sustainable development in the Town. We recognise the importance of planned growth, regeneration and investment, and we are fully supportive of development that strengthens Sixmilebridge as a **Small Heritage Town** to live, work and visit.

However, the clear view of our community is that further growth cannot continue in the absence of the services and infrastructure and public realm investment needed to properly support the development of the town. In recent years, Sixmilebridge has experienced ongoing development and population growth, but the corresponding enhancement of infrastructure and local services has not kept pace. As a result, there is a growing concern within the community that additional planning permissions may continue to be granted without the necessary supporting investment being secured in advance. In our view, this is no longer sustainable.



Government Town Centre First Policies (2022) intend to breathe new life into town centres. Sixmilebridge was the first Clare town to be awarded a Masterplan (published 2023) to deliver these objectives. Apart from a modest PDM funding to deal with pedestrian safety & traffic management in the core of the town, none of the proposals to enhance the Public Realm were funded. The historic public spaces of the Square & Georges Street remain run down with overhead wires, poor footpaths & street furniture. An attractive Public Realm is essential to bring in residents, to generate & sustain businesses. Additional volumes of traffic passing through but not stopping will reinforce the negative trends apparent in this town.

We have two primary concerns with the Proposed Variation: the inappropriate suburban, high- housing density levels and the failure to meet the fundamental principles of the Planning and Development Act 2000 (as amended) and the National Planning Framework (First Revision, 2025) that development must be plan-led, infrastructure-led, and aligned with the proper planning and sustainable development of the area.

The impact of the Proposed Variation is that the area of lands zoned residential in Sixmilebridge will rise to half that of the town of Shannon, while there is no comparison between these two towns in terms of infrastructure, services, employment, transport connectivity, and industry.

In its current form, the proposal reads as an isolated zoning exercise rather than a coordinated and plan-led evolution of the town.



DENSITY ISSUES

The proposed Settlement Capacity Audit details the following in Table 3.6

Settlement	Ref.	Area(ha)	Roads	Footpath	Water Supply	Waste Water	Compact Growth	Public Transport	Co-Ordinated Development	Tier1	Tier2	Estimated Density (dph)	Estimated Unit Yield	
Sixmilebridge	R1	1.55	1	2	1	1	✓	✓	✓		✓			
	R2	2.72	1	1	1	1	✓	✓	✓	✓				
	R3	0.51	1	2	1	1	✓	✓	✓		✓			
	R4	1.56	1	2	2	1	✓	✓	✓		✓			
	R5	0.93	1	1	1	2	✓	✓	✓		✓			
	R6	0.79	1	1	1	1	✓	✓	✓		✓			
	R8	3.69	1	2	1	1	✓	✓	✓		✓	35-50	130-185	
	R10	1.22	2	2	1	1	✓	✓	✓		✓	35-50	42-61	
	R12	1.31	2	2	1	1	✓	✓	✓		✓	35-50	45-66	
			14.28											
	SR1-R9	5.37	1	2	1	1	✓	✓	✓		✓	35-50	187-269	
	SR2-R13	1.21	1	2	1	1	✓	✓	✓		✓	35-50	42-61	
SR3-R7	3.76-3.78	2	2	1	1	✓	✓	✓		✓	35-50	132-189		
SR4-R11	3.76-7.58	2	2	1	2	✓	✓	✓		✓	35-50	265-379		
		14.11-22.22												

These densities are the highest densities being proposed across any towns in the county under these current proposals. For other towns covered in Vol. 3b densities of 25 or 25-40 are proposed.

In total this Proposed Variation, facilitating in excess of 1,200 dwellings on the outskirts of the town, is disproportionate to the size and function of Sixmilebridge and fails to reflect a sequential, compact growth approach as required under the National Planning Framework. This represents a pattern of suburban expansion rather than sustainable town growth.

While we acknowledge the ranking of SMB as a Small Town within the Limerick-Shannon Metropolitan Area (“LSMA”), by identity, character and location it is not a suburb of Shannon or Limerick city, it is not part of any contiguous suburban development of either town or city, nor located at the at the edge of either city or town. Furthermore, the application of higher suburban densities on peripheral lands conflicts with the Core Strategy (Chapter 3) of the Clare County Development Plan, which requires that growth be proportionate and aligned with infrastructure capacity.

The Proposed Variation Vol 1 Core Strategy Statement 3.4.2 recognises the importance of the “accommodation of local growth at a scale appropriate to the settlement size and function in the Service Towns, Small Towns and Large Villages”.

We do not consider this density to be at an appropriate scale, taken with the context of Limerick Shannon Metropolitan Area (LSMA) or on a standalone basis.



PA1b-21 states: “The density ranges support the application of densities that respond to settlement size and to different place contexts, recognising in particular the differences between cities, large and medium sized towns and smaller towns and villages”.

We do not believe this proposal addresses this issue.

The importance of proportionate planning is not only assumed throughout the planning guidelines, but specifically stated:

The Proposed Variations refer to Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (the “Guidelines”). These Guidelines repeatedly address the issue of character and density:

Section 3.4.2 Step 2: Considerations of Character, Amenity, and the Natural Environment: While considerations of centrality and accessibility will have a significant bearing on density, it is also necessary to ensure that the quantum and scale of development at all locations can integrate successfully into the receiving environment. New development should respond to the receiving environment in a positive way and should not result in a significant negative impact on character (including historic character), amenity, or the natural environment.

Section 3.3.1(i): The **key priorities** for city and metropolitan growth in order of priority are to: (a) strengthen city, town, and village centres, (b) protect, restore, and enhance historic fabric, character, amenity.

We would also like to note the clearly stated position in planning policy that density provisions are guidelines with provisions for easing of same:

Section 3.4 of the Guidelines specifically permit refining of densities : “The density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment.”

We do not believe the Proposed Variation addresses these considerations and so fails to meet the intent and terms of the Guidelines



The Guidelines recognise that they represent an assessment tool for planning authorities:

“This section sets out a methodology to assist planning authorities in appropriately integrating national planning policy in relation to settlement growth and residential density into statutory development plans and in the assessment of individual planning applications. The policies and objectives are intended as a tool to guide the appropriate scale of development at different locations, rather than as a prescriptive methodology.”

Flexibility is offered so that planning authorities “can operate a plan-led approach and take the circumstances of a plan area or an individual site into account as part of the decision-making processes.”

PLAN-LED DEVELOPMENT.

As we noted earlier, we recognise the national and local housing needs. However, we are concerned that a large share of Co. Clare’s proposed accelerated delivery of housing targets is being located in Sixmilebridge, by-passing proper and established planning policies.

PA 1b-44 States “In response to the NPF Implementation: Housing Growth Requirements Guidelines (2025) the release of Strategic Residential Reserve zoned land and the zoning of additional Residential land provides greater certainty in the accelerated delivery on housing targets in the short to medium term by providing an increase in development options at all tiers of the settlement hierarchy.”

We believe this conflicts with the implicit planning purpose of long-term strategic land zoning as set out in the subsequent clause PA 1b-45:

“Long-Term Strategic and Sustainable Development Sites are identified to indicate the potential for future delivery of housing within the next development plan period and give a clear indication where future investment in the required infrastructure is necessary to facilitate long-term growth, especially in settlements identified for growth, including Ennis Key Town, Shannon Metropolitan Town, and Ennistymon/Lahinch, Kilrush/Cappa and Scarriff/Tuamgraney Service Towns.”



The proposed PA1b-45 effectively acknowledges the need for sustainable, proper planning timelines, where strategic residential sites are identified in advance of the delivery of housing units, allowing for proper planning and consideration of investment requirements in infrastructure and public realm. The Proposed Variation clearly identifies areas in the county which are identified for growth and most importantly where provision for planning time, in advance of development, is being allocated to assess the investment requirements to support and facilitate such growth.

However, in the context of Sixmilebridge, the Proposed Variation bypasses this established sequential approach to development and, in doing so, is leap-frogging such pre-development infrastructural investment steps and proper planning, in effect this treats Sixmilebridge inequitably by pursuing an 'accelerated delivery' programme for the town. The proposal represents out-of-sequence and premature zoning, whereby lands are advanced for residential development, thereby bypassing the established plan-led and infrastructure-led approach to development.

In the absence of pre- development infrastructure investment, or even a commitment to parallel investment in the town's infrastructure, services and public realm, this Proposed Variation does not meet recognised planning standards.

We note that the Town has limited industrial, commercial, and business facilities. The proposed level of residential growth, without any commensurate employment provision, will materially degrade the jobs-to-homes ratio and further consolidate an unsustainable commuter-based settlement pattern.

This is contrary to the National Planning Framework, which seeks to align housing growth with employment and reduce long-distance commuting. The proposal would instead reinforce car-based commuting and cannot be considered to support the development of a self-sustaining community. The most recent Census recorded 78% of commuter work journeys from Sixmilebridge being completed by car, ranking the town as one of the highest-ranking car-dependent towns in the country.

PA 1g lists the top two Key Indicators of Quality Design and Placemaking to be Sustainable and Efficient Movement, and a Mix and Distribution of Uses. These guidelines are not being adhered to.



TRAFFIC, ROAD SAFETY, AND INFRASTRUCTURE

The town is already experiencing reported, significant congestion and road safety issues. Established pinch points exist at the old bridge and at the junction of the R462 and R471, where capacity is constrained and pedestrian and cyclist safety is compromised.

No Transport Assessment or infrastructure capacity analysis has been provided to demonstrate that the existing road network can accommodate the scale of development proposed, nor how these constraints will be addressed..

In the absence of such evidence, these re- zoning proposals are premature. Under the Settlement Capacity Audit each of the proposed rezoned areas in Sixmilebridge has been allocated a serviceable classification of Tier 1 or Tier 2, indicating whether each of these sites are or can be serviced by road links to existing infrastructure. However, this Audit does not address the town-wide infrastructural road and traffic issues and so these categories are misleading.

It would also appear that the proposed new Green Open Space at R7 is misleading in that it would look to be the logical connecting point between the Infrastructure Safeguards located at R7 and R12

Indeed, the proposed increase in housing density at R7 R12, R11, R2, R9 and R8 would appear to detract from the ability of the road Infrastructure Safeguards running through or adjacent to same sites to ever meet the town's existing and increasing road and traffic requirements in a safe and sustainable manner. We have particular road safety and traffic concerns regarding the development of R11, its density of dwellings and proposed vehicle connection to LT1. The associated, combined vehicle traffic and that associated with the train station's will merge with R471 at a junction which is blind to those approaching the town from Shannon due to the railway bridge.



With regard to each of the proposed zones we would expect the following to be pre-requisites:

- Adequate and accessible pathway and lighting to connect new residential estate to the town- these are peripheral locations and it is important to encourage sustainable, safe movement about the town.
- Connection to housing services, water, sewage, and electricity, to be tested and reported as adequate before housing is given green light to be built.
- Access and egress for emergency services to be viable across the centre of town without getting delayed in traffic
- The issue of safe passage across the old bridge in the centre of town to be addressed and a clear timetable established

As stated in PA1b-21 “The Guidelines expand on higher-level policies of the National Planning Framework, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing. The density ranges support the application of densities that respond to settlement size and to different place contexts, **recognising in particular the differences between cities, large and medium sized towns and smaller towns and villages.**”

This Proposed Variation, facilitating in excess of 1,200 dwellings on the outskirts of the town, is disproportionate to the size and function of Sixmilebridge. This represents a pattern of suburban expansion rather than sustainable town growth.

The terms of the General Objectives of the current Development Plan 2023-2029 included the expressed intention for Sixmilebridge : “To ensure that future growth is balanced and sustainable and is relative and appropriate to the scale, size and character of the existing town”. We do not believe that this Proposed Variation meets this objective.



The Settlement Capacity Audits, completed county-wide, under the Proposed Variation, list the proposed housing densities for Sixmilebridge higher than those proposed for Ennis, the county town, or Shannon the major employment centre. This is for a town with very limited local employment, limited land zoned commercial or industrial, no local health centre and no secondary school. This is also true for both the categories of Newly Identified Residential Land and Newly Identified Long Term Strategic and Sustainable Development Sites. There are no supporting planning proposals with regard to infrastructure or place making and public realm commitments. This is simply a strategy to place high density housing in an unprepared location, with no accompanying plan for the residents, out of character town expansion and the implicit support of the expansion of a dormitory, car-driving commuter town. This is not proper planning and sustainable development.

CONCLUSION

In its current form, the proposal reads as an isolated zoning exercise rather than a coordinated and plan-led evolution of the town.

The proposed variation also gives rise to serious concerns regarding both the sequencing and overall coherence of the Development Plan. We believe it represents out-of-sequence and premature zoning, effectively bypassing the established plan-led and infrastructure-led approach to development.

Furthermore, there is a clear lack of consistency and integrity in the proposal. While the Development Plan emphasises the protection of settlement character and the delivery of coordinated, plan-led growth, the variation introduces a substantial scale of residential development without demonstrating how these principles are being applied in practice. The effect is to significantly expand the footprint and population of the town without any corresponding framework for infrastructure, services, employment, or integration with the existing settlement strategy.

This creates a disconnect between the stated objectives of the Development Plan and the practical effect of the proposed zoning, thereby undermining the integrity of the plan-led approach.



The proposed rezoning and density provisions would facilitate a scale and form of development that is excessive, car-dependent, and unsupported by proper planning, infrastructure, public realm and place making or employment provisions. It would reinforce an unsustainable commuter pattern, exacerbate existing traffic and safety issues, and result in suburban-style sprawl that is not appropriate to the character or function of Sixmilebridge.

We believe that the cumulative impact of development on the village must be fully assessed and the proper sequencing of development and infrastructure delivery should be embedded in the final planning approach for Sixmilebridge.

As a final point, we would like to state that we firmly believe that Clare County Council have the opportunity to set a standard on how to develop what is in effect, primarily a dormitory town, albeit one with the advantages of a riverside location and a historic built environment. We want to support the development of our town into a desirable place to live. All planning policies refer to the protection of character and need for plan-led development. The public realm needs investment. The existing traffic and road safety problems need investment. The proposed riverside walkway connecting the town with one of Clare's main tourist destinations needs support and investment. We should be recognising, embracing, and developing what we have in place, to take pride in what we have and not set in motion proposals which will permanently detract from the opportunity to develop a great place to live.