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To: [Development Plan](#)
Cc: [REDACTED]
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029
Date: Tuesday 7 April 2026 12:02:25
Attachments: [REDACTED]

Dear Sir/madam,

Please see attached a submission to Variation No.1 to the Clare County Development Plan 2023-2029 on behalf of our client Pat Mulcair, Marlfield Developments Ltd.

Should you require any further information please do not hesitate to contact me.

Kind regards,
Katie.

Katie Fleming
Planner

MKO



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Clare County Council Proposed Variation No. 1 to the Clare County Development Plan 2023- 2029

Marlfield Developments -
Clonroad More, Clare –
Submission





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1.

EXECUTIVE SUMMARY

This submission is made on behalf of our client of Pat Mulcair, Marfield Developments Ltd. in response to Proposed Variation No. 1 to the Clare County Development Plan 2023–2029, published by Clare County Council on the 6th March 2026 pursuant to Section 58 of the Planning and Development Act 2024 (as amended).

The submission relates to lands at Clonroad More, Ennis, Co. Clare, located within the Ennis Municipal District settlement boundary and currently zoned for ‘Agriculture’. The lands are strategically positioned approximately 2.5 km from Ennis Town Centre and are surrounded by established residential development to the north, south, and southeast. Notably, lands immediately adjacent to the site (Site R37 & Site R28) are proposed for residential zoning under this Variation, reinforcing the established residential character and development pattern in the area.

In December 2025, the subject lands formed part of a submission aimed at rezoning the lands residential which was aimed at supporting the National Planning Framework (NPF) Implementation: Housing Growth Requirements. While this proposal was not successful due to ecological considerations, the client acknowledges these constraints and is willing to facilitate a partial rezoning approach. Specifically, the client invites Clare County Council to identify and rezone an appropriate portion of the land for residential use, having regard to ecological sensitivities.

The planning context strongly supports residential development at this location. The site benefits from existing and established infrastructure, including pedestrian, cycling, and vehicular connectivity to Ennis, as well as proximity to schools, childcare facilities, public transport services, and a range of local amenities. Furthermore, a precedent for development exists, including a previously granted planning permission (Pl. Ref. 071779) for 82 dwellings, a crèche, and associated infrastructure on the subject lands.

Importantly, the principle of residential development in this area has been accepted by Clare County Council, both through existing surrounding developments and the proposed rezoning of adjacent lands (including R37) under this Variation. These rezonings include site-specific mitigation measures addressing ecological sensitivities, particularly in relation to the Lesser Horseshoe Bat associated with the Newhall & Edenvale SAC.

In light of the above, this submission seeks a single primary outcome: the rezoning of all or part of the client’s landholding from ‘Agriculture’ to ‘Residential’. It is considered that such a change is justified, consistent with proper planning and sustainable development, and would contribute positively to housing delivery objectives in line with national and local policy.

2.

INTRODUCTION

We note that Clare County Council has prepared a proposed Variation No.1 to the Clare County Development Plan 2023-2029 pursuant to Section 58 of the Planning and Development Act 2024 (as amended).

On behalf of our client, Pat Mulcair, Marfield Developments Ltd., we wish to make a submission to Clare County Council in relation to this proposed variation which was published for public consultation on the 6th March 2026 and closes the 7th April 2026. Our client is the owner of lands at Clonroad More, Ennis, Co. Clare as indicated on Map 01 attached.

The subject lands are located at Clonroad More, in Ennis. The site is within the Ennis Municipal District Settlement boundary. The lands are zoned for the use of 'Agriculture' in the Clare County Development Plan 2023-2029.

In December 2025, MKO made a submission on behalf of the client as Clare County Council invited the public, landowners, homebuilders and other interested parties to put forward suggestions for lands that are suitable for zoning for residential use (greenfield/brownfield/infill/regeneration sites) to help Clare County Council meet the objectives of the NPF Implementation: Housing Growth Requirements Ministerial Guidelines in terms of contributing to the acceleration of housing delivery over the remaining life of the Clare County Development Plan. However, the lands our client put forward to rezone 'Residential' to help Clare County Council achieve the NPF objectives were rejected due to ecological concerns. Our client is cognisant of these ecological concerns and would appreciate the opportunity to allow Clare County Council to select a portion of the lands to be rezoned 'Residential'.

It must be noted that planning permission has been previously granted on the subject site, for an application proposing 82 dwellings. Additionally, the lands to the north, south and southeast of the site are residential. It must also be noted that as part of this proposed Variation, lands immediately north, east and west of the subject lands has been rezoned 'Residential'. Therefore, the principle of residential development for the lands in the area has been accepted by Clare County Council from both a policy and development management perspective.

It is considered that a change of zoning from agricultural to residential is warranted and in accordance with proper planning and sustainable development of the area.

3.

SITE LOCATION AND CONTEXT

The subject lands are located south of the N85. There is direct access to via a local road, Clonroadbeg, (L4176) which connects the site to the N68 and the R458 (See Figure 2 below). The subject lands are secured on all boundaries by shrub planting and a wooden fence. The site is approximately 2.5km south of Ennis Town Centre.

The subject site measures approximately 33 acres and consists of mainly shrub land. It is an overgrown stretch of land which is not currently used for agricultural purposes. The site is bound to the north by a National Road, to the west by more open space and to the east and south by a linear pattern of residential development. There is also a small infill plot of land between the residential dwellings that stretches out to the local road. In terms of wastewater treatment, the Ennis area is served by treatment plants at Clonroadmore and Clareabbey. Uisce Éireann is progressing works to ensure that wastewater services are available to meet the population targets. It is stated in the Clare County Development Plan 2023-2029 that *'the existing Clareabbey WWTP will have sufficient capacity to cater for the current load from the area along with some added capacity.'*



Figure 1 Site location map (Site outlined in red, indicative only)

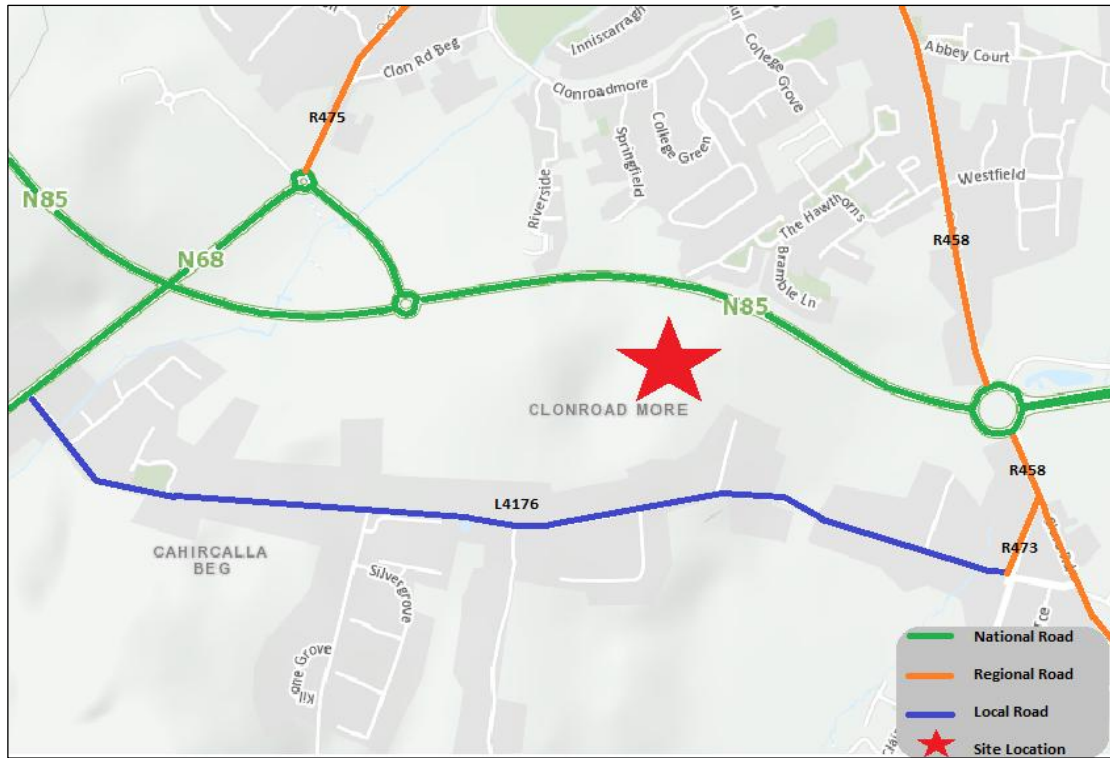


Figure 2 Map showing the access roads to the site

4. CLARE COUNTY DEVELOPMENT PLAN 2023-2029

4.1 Current Zoning

Under the Clare County Development Plan 2023-2029, the subject lands are zoned as ‘Agriculture’ (See Figure 3). The general description for Agricultural zoning in the Development Plan reads as follows:

Agriculture - This zone is for the use of land for agricultural purposes and farming-related activities and to preserve the amenity of the town or village setting. Individual dwellings for permanent occupancy of established landowners (i.e. within family ownership for the preceding 10 years) and their immediate family members will be open for consideration subject to normal site suitability considerations.

It must be noted that there are copious other sites in Ennis zoned for Agricultural use.

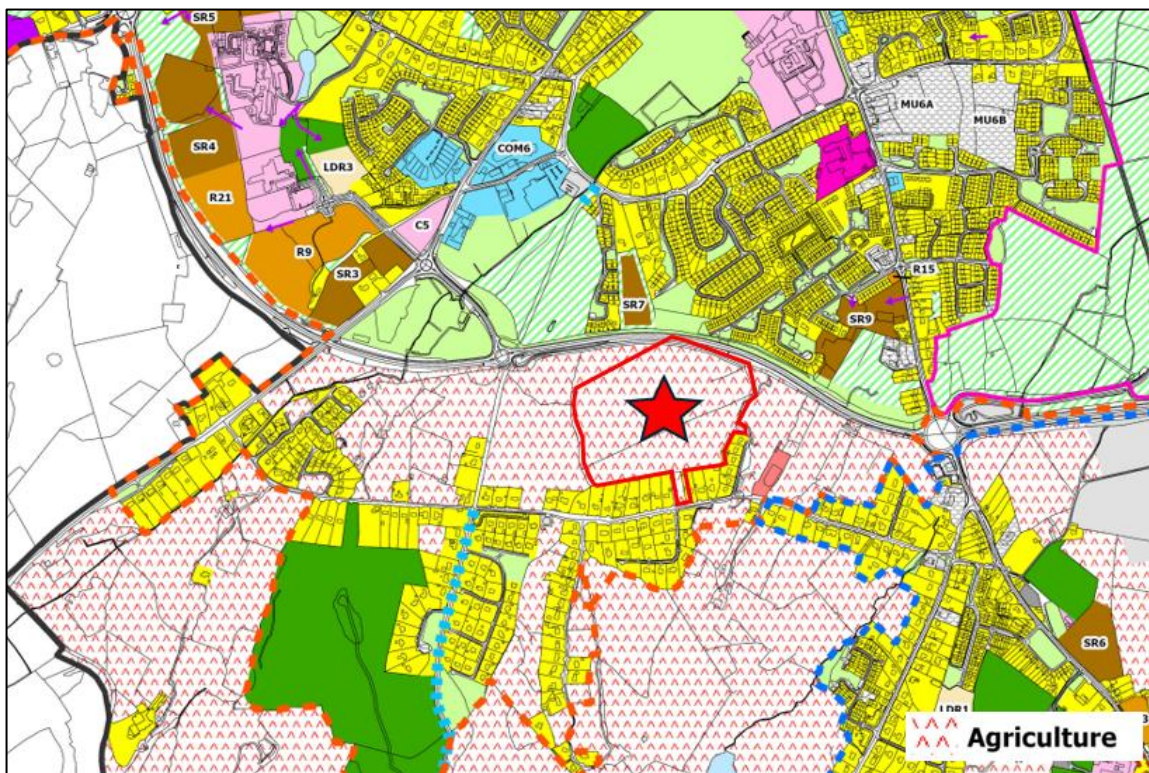


Figure 3 Site Zoning Map (Site outline indicative only, site marked with red star).

4.2 Former Zoning

Prior to the current ‘Agriculture’ zoning the lands were identified to be zoned for ‘Residential’ use as seen in Ennis and Environs Development Plan 2008 had the subject lands zoned for Residential Use (See Figure 4).

Ennis and Environs Development Plan 2008 outlined the general objective for ‘Residential’ zoning ‘to reserve land for the development of new residential areas.’

It is important to note that most of the land northeast to the subject site, which was also zoned to be residential in the Ennis and Environs Development Plan 2008, has since been developed to residential dwellings.

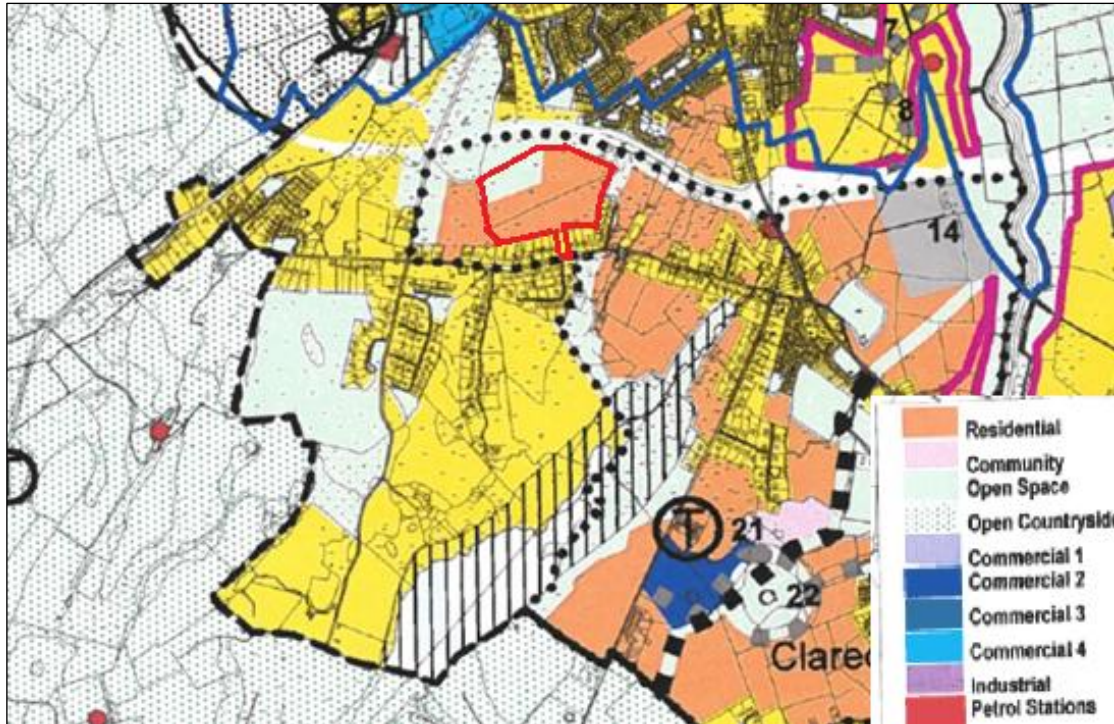


Figure 4 Ennis and Environs Development Plan 2008 - Zoning Map (Subject site outlined in Red).

4.3

Proposed Variation No. 1 Zoning

With the proposed Variation, the subject site is still zoned 'Agriculture', however sites immediately north (R28), east (R34) and west (R37) of the site is proposed to be rezoned 'Residential'. The inclusion of R37 to be rezoned Residential indicates there is support and recognition for Residential zoning at this location. It must be acknowledged by Clare County Council that through this Variation and the former zoning, Residential zoning is acceptable in this area and is in accordance with proper planning and sustainable development of the area.

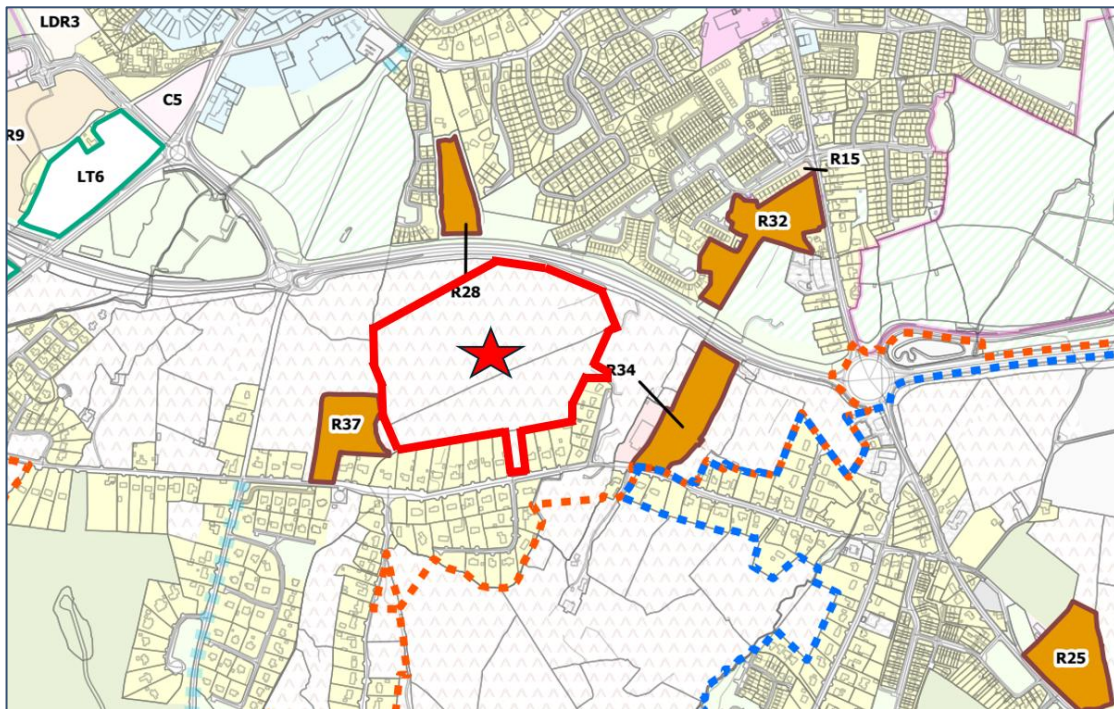


Figure 5: Proposed Variation No. 1 - Volume 3a(i) Ennis & Clarecastle Settlement Plans

4.4 Development Constraints

4.4.1 Flooding

Following a review of the Office of Public Works (OPW) Flood Maps portal 2024, it should be noted that part of the subject site is located in an area which is currently under review (See Figure 6).

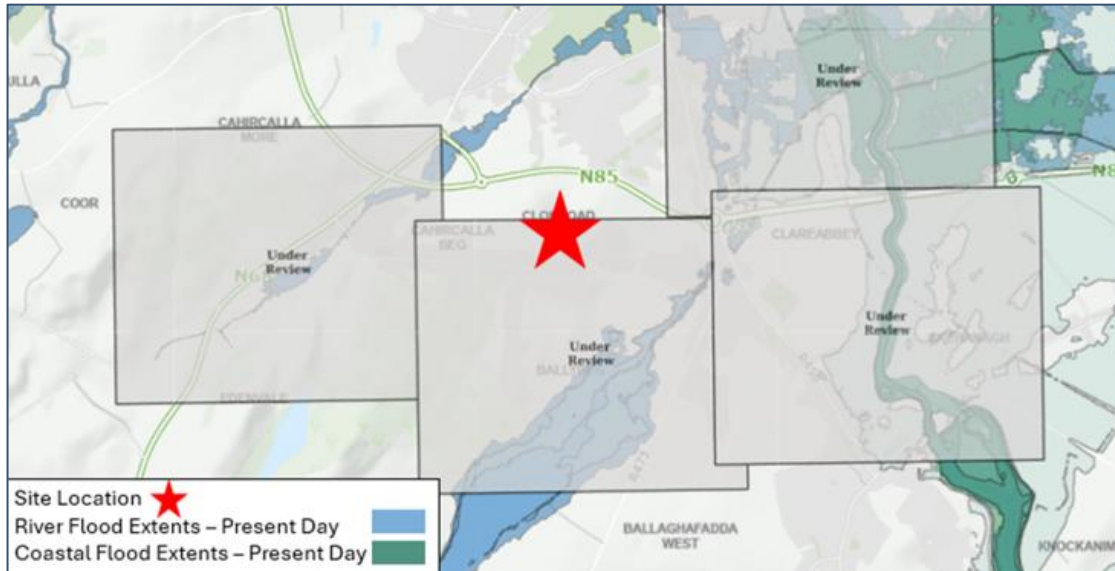


Figure 6: Flood Maps

4.4.2 Ecology

The subject lands are not located in the vicinity of any European or National designated sites. The closest designated site is c. 1.26km southwest from the subject lands at its nearest point, which is Newhall and Edenvale SAC and c. 1.51km east is the Lower River Shannon SAC.

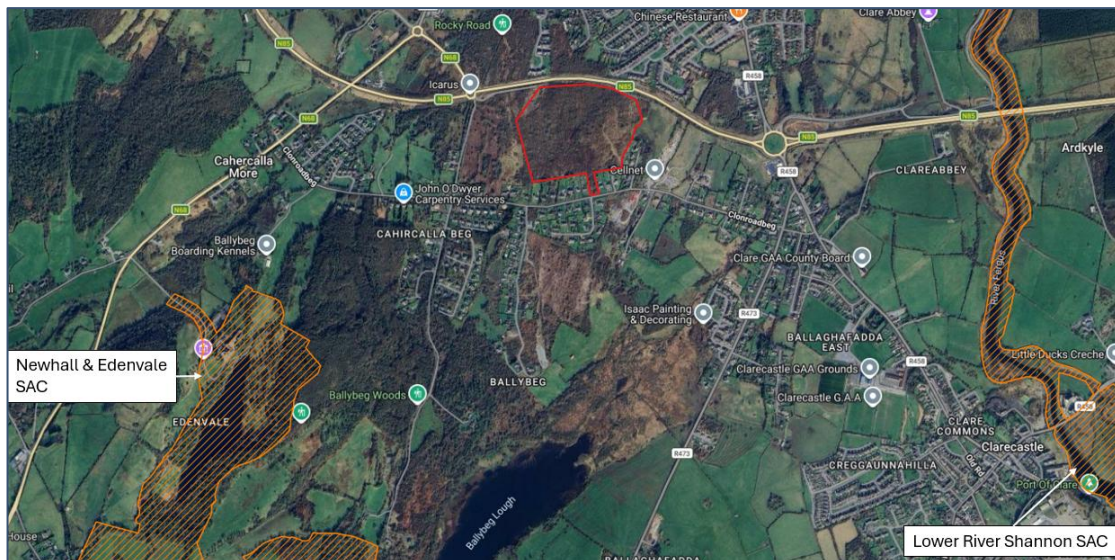


Figure 7: Location of Designated Sites.

Following the submission made in December 2025 by MKO on behalf of our client, it was brought to our attention that the subject lands were not selected to be rezoned due to the proximity of the site to the

Newhall & Edendale SAC. Reviewing NPWS conservation objectives for this SAC, it is observed that the Lesser Horseshoe Bat *Rhinolophus hipposideros* is a Qualifying Interest of the SAC. As part of the conservation objectives for the SAC and to maintain a favourable conservation condition for the Lesser Horseshoe Bat in Newhall & Edendale SAC, the NPWS have a target for no significant decline within 2.5km of qualifying roosts. It is our understanding that Clare County Council did not select the subject lands due to the subject lands sitting within the 2.5km buffer and the inclusion of the subject lands in the potential foraging sites for the Lesser Horseshoe Bat *Rhinolophus hipposideros*.



Figure 8: Location of the Subject Lands in relation to the Potential Foraging Grounds for the Lesser Horseshoe bat

However, it must be acknowledged by Clare County Council that sites R37 and R28 also sit within the 2.5km buffer and these sites are also within the potential foraging grounds for the Lesser Horseshoe Bat. Our client is cognisant that sites R37 and R28 are smaller in comparison to the subject lands and therefore is offering an opportunity for Clare County Council to select a portion of the subject lands to be rezoned 'Residential'. Our client understands that rezoning a smaller portion of the site to 'Residential' would not significantly decline the potential foraging grounds.

Additionally, our client is aware that future development of site R37 shall be guided by site specific mitigation measures and as stated within the proposed Variation -

'Given the proximity of the site to Newhall and Edenvale complex SAC, any development proposal shall ensure that no adverse effects occur on the conservation objectives of these designated sites. Existing hedgerows and treeline within and bounding the site should be protected and integrated into any proposed development, providing an appropriate buffer to protect their value as a potential foraging and wildlife commuting corridor including for Lesser Horseshoe bats.'

Due to the proximity, similar location and similar characteristics of the subject lands and site R37, we respectfully request that Clare County Council rezone a portion of our clients lands 'Residential' subject to the mitigation measures as set out for site R37.

5.

PLANNING HISTORY

According to the Clare County Council online planning portal there have been a number of applications on the subject and surrounding lands. These are outlined below in Table 1.

Table 1 Planning History of the indicative subject site

Planning Ref.	Date Received	Decision	Decision Date	Description
04702	01/04/2004	Granted (Conditional)	20/05/2004	To construct a bungalow, septic tank including ancillary site works
051791	19/09/2005	Granted (Conditional)	10/11/2005	To construct slatted house, roofed structure covering existing open slurry pit, dairy wash tank, waste collection yard, and associated site works
041980	23/09/2004	Granted (Conditional)	22/09/2005	A) Revised house design with 2 No. car parking spaces, b) Revised site layout showing: 1Reduction of No. of houses from 11 no. detached to 8 No semi-detached and 1 No. detached; (2) Increased public open space; (3) Details of water mains, foul sewer and storm/surface water networks (4) Turning bays in accordance with section 2.6 of ;recommendations for site development work for housing areas: (5) Existing contour levels relative to finished floor levels of proposed houses; (6) Relocation of existing high tension power lines; (7) Detailed landscaping proposals.
042702	22/12/2004	Granted (Conditional)	25/04/2006	to construct 120 residential units which consists of 28 apartments and 92 houses together with ESB substation, creche and associated site works.
071433	31/05/2007	Refused	24/07/2007	To demolish existing office and storage building and to construct 94 houses and creche facility together with associated site works
071779	02/07/2007	Granted (Conditional)	28/01/2008	to construct 82 houses together with creche and ESB substation facility and associated site works
08730	07/05/2008	Refused	25/06/2008	For outline permission for 16 houses
16678	05/09/2016	Granted (Conditional)	26/01/2017	For development which will consist of the construction of a dwelling house, ancillary site works and connection to public services (note



				part foundations and rising walls previously constructed under Pl. Ref. 04-1980)
17818	20/12/2017	Refused	12/12/2017	For development which will consist of the construction of a new dwelling house and freestanding garage with site works and connections to services

6.

PREVIOUS SUBMISSION TO CLARE COUNTY COUNCIL

A submission regarding this site was made to Clare County Council on the Draft Clare County Development Plan 2023-2029. The Chief Executive’s Response highlighted the following points:

1. *‘The site is significantly removed from the town centre and it is considered that additional residential zoning of the scale proposed at this location would militate against the achievement of compact growth as set out in CDP 4.13 Planned Growth of Settlements, would be contrary to the sequential approach to development and would be contrary to the principle of sustainable development.’*

It is respectfully submitted that the location of the subject site, while 2.5km outside the immediate town centre, does not preclude it from contributing to compact and sustainable growth. The *Sustainable and Compact Settlements - Guidelines for Planning Authorities* identifies Ennis as a key town and the subject site is located within the Suburban Extension of Ennis. Suburban areas are the low-density car-orientated residential areas constructed at the edge of the town. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban extension locations of Key Towns.

Strategic Residential Reserve lands have been identified to the north of the subject site (see Figure 9). These lands (SR7, SR9, SR3, SR4, SR5) comprise infill or contiguous sites or in some cases there is an on-site planning history of residential use. These lands are considered as the most appropriate sites for the long-term sequential expansion of the relevant settlement. The subject site is located within close proximity of five sites zoned as Strategic Residential Reserve, the rezoning of the subject site as residential represents a logical and sequential extension of the existing built-up area, consolidating development along established infrastructure corridors and within walking/cycling distance of key local services and amenities.

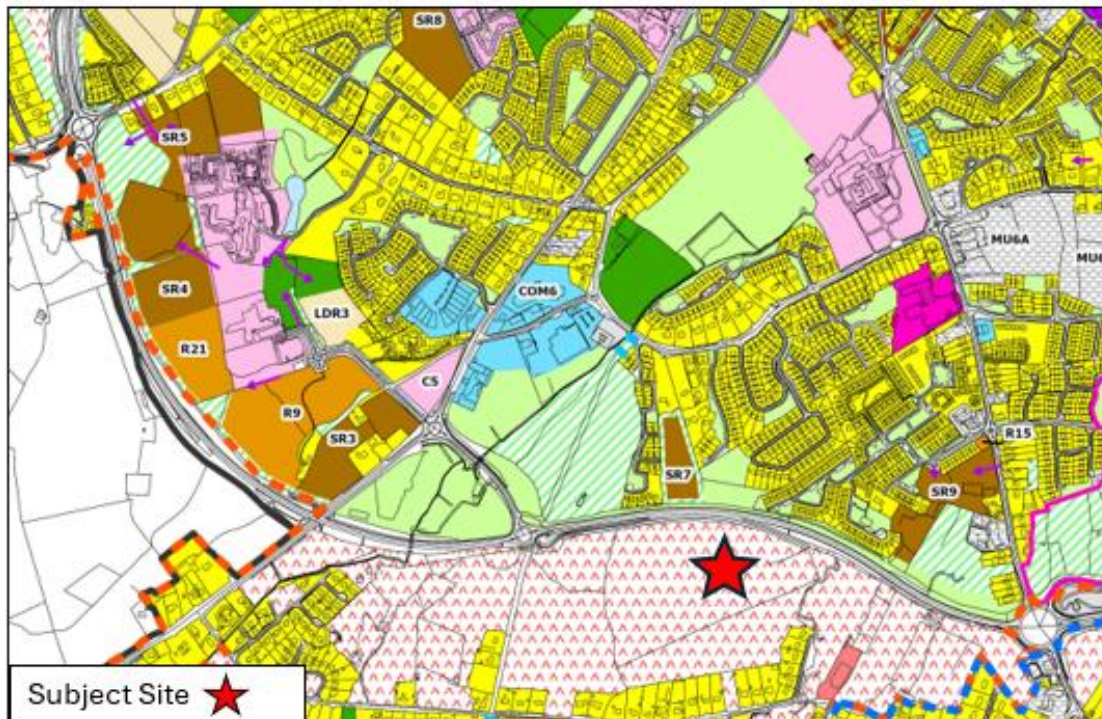


Figure 9 Strategic Residential Reserve lands within 1.6 km of the subject site

As part of this proposed Variation, some of these Strategic Residential Reserve Lands are proposed to be rezoned to Residential namely SR5 (proposed R30), SR4 (proposed R29), SR7 (proposed R28) and SR9 (proposed R32). This strengthens the position that the location of the subject site does not preclude it from contributing to compact and sustainable growth as Clare County Council are proposing to rezone lands to

Residential that are in close proximity to the subject lands as well as site R28 similarly located within the potential foraging grounds for the Lesser Horseshoe Bat.

Furthermore, the development supports the principles of compact growth outlined in CDP 4.13 by:

- **Supporting the sequential approach of development** as the subject site forms part of the next sequential tier of lands adjoining the built-up footprint. The proposal therefore accords with national and local policy directing that, after infill and brownfield sites, sequentially located edge-of-settlement lands should be considered where they can contribute to compact growth.
- **Ensuring appropriate scale and character** of a new development in the area. A precedent for residential development is set and well established in the area, with residential dwellings developed on the lands immediately north, south and southeast to the subject site. Additionally, planning permission to develop the subject lands was previously granted under Pl. Ref. 071779, for the construction of 82 houses, a creche and an ESB substation facility and associated site works.
- **Utilising serviced land** that can be efficiently connected to physical infrastructure (i.e. water, wastewater, surface water, lighting, footpaths, access and similar) and social infrastructure (such as schools, community facilities and similar). The subject site is connected to Ennis via an established vehicle, cycling and pedestrian infrastructure. The subject lands are directly linked to services in Ennis via an existing footpath along all the roads connecting the site, including Clare Rd, N85 and the L4176. Additionally, the site is located just a 10-minute walk to Spraoi Early Learning Centre, Ennis National School and Realta Draiochta Preschool with an existing pedestrian route.

In this context, the development is consistent with the principles of sustainable development, representing an efficient, plan-led use of land that will support the vitality of the settlement while delivering much-needed housing in a sustainable and coherent manner.

2. *‘The location and extent of land zoned for residential uses is determined by the Core Strategy, as set out in Volume 1 of the Draft Plan in accordance with Section 28 Guidelines, Housing Target Guidelines and the Core Strategy. It is considered that a sufficient quantum of land has been zoned in the Draft Plan to accommodate the allocated population growth of Ennis Town and Environs over the plan period 2023-2029.’*

In recognition of its status as an important economic and residential centre, Ennis is designated as a ‘Key Town’ in the Regional Spatial and Economic Strategy for the Southern Region (RSES). The RSES identifies Ennis for significant population growth of greater than 30% above 2016 population levels by 2040. In achieving this population growth, it is a requirement that at least 30% of all new homes targeted for Ennis are delivered within the existing built up footprint of the town.

The Ennis Municipal District, with a population of 30,910 (CSO 2016), encompasses the Key Town of Ennis, Clarecastle, and the surrounding villages of Barefield, Doora, Kilnamona and Toonagh and a vibrant network of clusters and countryside areas. Ennis Municipal District is located in an identified Working Landscape and is centrally located on the main economic growth corridor in the Mid-West Region forming part of the Atlantic Economic Corridor.

The Clare County Development Plan (CCDP) 2023-2029 states that in Ennis (Including Clarecastle) there is 50.34 Ha. of Residential Zoned land, 40.71 Ha. of Low Density Residential Zoned land and 30.64 Ha. of Strategic Residential Reserved Zoned land.

The CCDP 2023-2029 outlines in order to meet the overall goal for the future development of housing and sustainable neighbourhoods, it is a strategic aim for the settlement area of Ennis Town and Environs ‘to plan for a population growth in Ennis in excess of 30% by 2040’ and ‘to ensure that sufficient lands are zoned for residential use in the settlement of Ennis to accommodate the target population growth’.

3. *‘To zone the subject land for residential use would not be in accordance with the settlement strategy for Ennis, and the area in which the lands are located is known to have wastewater infrastructure inadequacies. I do not therefore consider it to be in the interest of the proper planning and sustainable development of the plan area to zone these lands for residential development.’*



In terms of wastewater treatment, the Ennis area is served by treatment plants at Clonroadmore and Clareabbey. It is stated in the CCDP 2023-2029 that Uisce Éireann is progressing works to ensure that wastewater services are available to meet the population targets and that *'the existing Clareabbey WWTP will have sufficient capacity to cater for the current load from the area along with some added capacity.'*

7.

THE PLANNING CASE

The extent of our client's landholding is pictured in Map 01 attached. This submission seeks one main outcome - for the lands or part thereof currently owned by our client which are zoned for 'Agriculture' use, in the current Clare Development Plan 2023-2029, to be changed to Residential zoning, and our client would like to put forward their lands, which are suitable for zoning for residential use, for consideration to Clare County Council. As set out throughout this submission, our client is aware the entire landholding may not be suitable to be rezoned due to ecological concern. Therefore, our client wishes to extend Clare County Council the opportunity to select a portion of the land to be rezoned Residential.

As part of the planning case to provide a residential zoning on the client's lands, it is requested the Planning Authority note the following:

- The subject site is surrounded by clusters of residential development directly south and north of the subject lands.
- The lands are located in a strategic location, 2.5km from Ennis Town Centre.
- A precedent for residential development is set and well established in the area, with residential dwellings developed on the lands immediately north, south and southeast to the subject site. There are two sites zoned for Residential development to the north west of the site (R9 and R21). Additionally, planning permission to develop the subject lands was previously granted under Pl. Ref. 071779, for the construction of 82 houses, a creche and an ESB substation facility and associated site works.
- The lands were previously zoned as 'Residential' before they were de-zoned to 'Agriculture'. Similarly, lands to the north of the subject sites that were also zoned 'Residential' have now either been developed or remain to be zoned for residential use.
- The subject site is connected to Ennis via an established vehicle, cycling and pedestrian infrastructure. The subject lands are directly linked to services in Ennis via an existing footpath along all the roads connecting the site, including Clare Rd, N85 and the L4176.
- The site is located just a 10-minute walk to Spraoi Early Learning Centre, Ennis National School and Realta Draiochta Preschool with an existing pedestrian route.
- A number of amenities are located within walking distance of the site e.g., Maxol Service station, Super Netto, Hotels, Bars and Restaurants.
- The site is serviced by 2 bus stops within a 10-minute walk from the site by buses 330, 330x and 51.
- Lands immediately adjacent to the site are proposed to be rezoned Residential as part of this Variation - R37, highlighting there is support and precedent for Residential zoning at this location, including site specific mitigation measures that ensures future development of the site will not have significant effect on the Lesser Horseshoe Bat which is a Qualifying Interest of the Newhall & Edenvale SAC.

