

**From:** [REDACTED]  
**To:** [Development Plan](#)  
**Subject:** Submission to Variation No.1 to the Clare County Development Plan 2023-2029  
**Date:** Tuesday 7 April 2026 15:18:57  
**Attachments:** [image001.png](#)  
[CIF Submission to Clare County Council Variation to CDP.pdf](#)

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A Chara,

Please see attached Submission on behalf of the CIF Mid-West Branch.

Kind regards,

George

**George Gill**  
Regional Executive, CIF Southern Region

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Senior Planner,  
Forward Planning Unit,  
Clare County Council,  
Áras Contae an Chláir,  
Ennis,  
Co. Clare.

7<sup>th</sup> April 2026

**Re: CIF Mid-West Branch Submission to the Public Consultation on the Proposed  
Variation No.1 to the Clare County Development Plan 2023–2029**

Dear Sir / Madam,

On behalf of the Construction Industry Federation (CIF) Mid-West Branch, I welcome the opportunity to make a submission on the Proposed Variation No.1 to the Clare County Development Plan 2023–2029.

The CIF recognises the importance of ensuring that County Development Plans remain aligned with national policy, updated statutory guidelines, and the practical realities of delivering housing, infrastructure, and employment-generating development. Variation No.1 represents a significant restructuring of the plan, particularly in relation to the Core Strategy, settlement hierarchy, zoning approach, and the integration of new strategic documents for Ennis.

The CIF acknowledge the intent of Clare County Council to ensure compliance with the National Planning Framework (NPF), the Housing Growth Requirement Guidelines (2025), the Sustainable Residential Development and Compact Settlements Guidelines (2024), and the Residential Zoned Land Tax (RZLT) provisions.

**General Position of the CIF**

The CIF supports the principle of aligning the Clare County Development Plan with updated national guidance, provided that the variation maintains:

- Sufficient headroom to ensure viable housing delivery.
- A balanced approach to compact growth that does not unduly constrain development in smaller settlements.
- Certainty for industry, particularly regarding zoning changes linked to RZLT.
- A clear and implementable Core Strategy, supported by realistic population and housing targets.

- Integration of economic and transport strategies that facilitate employment growth and sustainable mobility.

The County Development plan variation should also provide for:

- Upgrading of infrastructure particularly treatment plants and access roads, with timeframes for delivery included in the development plan.
- Nature-Based Solutions (NBS) for wastewater in rural areas for 40 units and under, it should be looked at if these treatment plants can be installed in unzoned land or land be zoned for that purpose so to maximise housing units on zoned land within the site.

### **CIF Commentary**

#### **Proposed Amendment 1a**

The restructuring of Volume 3a into four components is a welcome clarification that strengthens the plan's internal coherence.

- Ennis & Clarecastle Settlement Plan (3a(i))
- Ennis Municipal District Settlement Plans (3a(ii))
- Ennis 2040 Economic & Spatial Strategy (3a(iii))
- Ennis Local Transport Plan (3a(iv))

We support this restructuring, as it provides clearer guidance for developers and investors and ensures that Ennis' strategic role is properly reflected.

#### **Proposed Amendment 1b**

This is the most substantive change which includes:

- Replacement of the existing Core Strategy Table with a new Table 3.6.
- Revised population and housing allocations to reflect the NPF Housing Growth Requirement Guidelines (2025).
- Adjustments to settlement tiers and distribution of housing growth.

Alignment with national guidelines are supported; however, the revised housing allocations must ensure adequate headroom to avoid supply constraints. The CIF recommends that Clare County Council publish a clear methodology for how the new targets translate into serviced land availability, particularly in Tier 3–5 settlements.

The Council is urged to ensure that the Core Strategy does not inadvertently restrict development in settlements where market demand is strong and infrastructure capacity exists.

#### **Proposed Amendment 1c**

The updated text strengthens the emphasis on compact growth and sequential development. Compact growth is supported in principle; however, it must be implemented pragmatically. Many smaller settlements rely on edge-of-centre lands for viable development. The CIF recommends

that the Council retain flexibility to zone and service such lands where they represent the most deliverable options.

#### **Proposed Amendment 1d**

The updated chapter reflects new national guidelines on sustainable residential development and compact settlements. While the CIF welcome the alignment with national policy there must be emphasis on:

- The need for clear density guidance that reflects local market conditions.
- The importance of phasing policies that do not delay viable projects.
- The need for timely infrastructure delivery, particularly water and wastewater services.

#### **Proposed Amendment 1e**

The integration of the Ennis 2040 Strategy strengthens the economic vision for the county. The inclusion of the Ennis 2040 Strategy is supported by the CIF, which provides a robust framework for employment growth, regeneration, and investment certainty.

#### **Proposed Amendment 1f**

This includes zoning changes required under the Residential Zoned Land Tax (RZLT) and adjustments to ensure consistency with the updated Core Strategy.

The principle of aligning zoning with RZLT guidance is supported by the CIF; however, any rezoning must be carefully assessed to avoid unintended impacts on housing supply. Lands currently subject to active development proposals should not be rezoned in a manner that undermines viability or delivery timelines.

The CIF recommends that the Council publish a clear rationale for each zoning change, including serviceability assessments.

#### **Proposed Amendments 1g & 1h**

These updates ensure consistency with the revised chapters and national guidelines. The CIF recommends that the Council ensure all development management standards remain proportionate and do not impose unnecessary burdens on housing delivery.

#### **Municipal District Settlement Plans (Volumes 3a–3d)**

The variation includes updates to settlement plans across all municipal districts, with the most significant changes in Ennis due to the integration of the Ennis 2040 Strategy and Local Transport Plan.

Transport integration is essential for compact growth and economic development. For Shannon, Killaloe, and West Clare MDs, the CIF recommend that the Council ensure adequate zoned and serviced land remains available to support balanced regional development.

### ➤ **Ennis Municipal District**

With regard to foul service issues associated with Ennis, we note that the Municipal District is serviced by two wastewater treatment plants.

In relation to the Clarecastle Plant, it is noted that Uisce Éireann is undertaking a project to upgrade the Wastewater Treatment Plant (WWTP) at Clareabbey. The project is currently at feasibility stage, and a completion timeframe has not yet been confirmed but it is understood that no physical connection to the public foul sewer can be made until the WWTP upgrade is delivered.

This effectively restricts access from zoned lands intended to be serviced by the Clarecastle Plant and is likely to curtail development in the area for an extended period.

In relation to the second plant, the Clonroad Plant, our members would require confirmation regarding capacity and access. This is necessary to provide confidence in respect of lands to be serviced by this plant and to facilitate the progression of lands for development.

### ➤ **Shannon**

We note that Shannon, the second largest town in Clare, is not covered within the proposed document. While we acknowledge that this will be addressed through a Local Area Plan, the overarching plan should set out a clear and defined timeline for the preparation and adoption of this Local Area Plan.

### **Planning Contributions**

It is noted that a substantial proportion of lands included in the proposed variations for zoning are identified as Tier 2, requiring extensions to services and infrastructure upgrades.

This will result in significant additional costs for developers. In order to alleviate this burden and support the delivery of development, the CIF request that the Council review the contributions applicable to these lands, including consideration of possible reductions or waivers.

### **Strategic Environmental Assessment (SEA), Natura Impact Report (NIR) & Flood Risk Assessment (FRA)**

The CIF support the Council's compliance with environmental assessment requirements and encourage continued engagement with industry to ensure that environmental objectives and development feasibility are balanced.

### **Recommendations**

The CIF welcome the opportunity to make this submission to the Proposed Variation No. 1 to Clare County Council Development Plan 2023-2029 and submit that the Council:

- Ensure adequate headroom in housing land supply across all settlement tiers.
- Provide transparent serviceability assessments for all zoning changes.
- Avoid rezoning active development lands unless absolutely necessary.
- Maintain flexibility in applying compact growth principles in smaller settlements.
- Ensure alignment between the Core Strategy and infrastructure investment plans, particularly in water services.

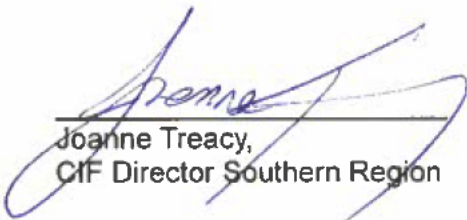
- Publish clear implementation pathways for the Ennis 2040 Strategy and Local Transport Plan.
- Upgrade infrastructure particularly treatment plants and access roads, with timeframes for delivery.
- Utilise unzoned land or zone land for the purpose of Nature-Based Solutions (NBS) for wastewater in rural areas for 40 units and under, so to maximise housing units on residential zoned land.
- Set out a clear and defined timeline for the preparation and adoption of the Shannon Local Area Plan.
- Review the development contributions applicable to Tier 2 lands, including consideration of possible reductions or waivers to support the delivery of development.

### **Conclusion**

The CIF commends Clare County Council for undertaking this important variation and for its commitment to aligning the Development Plan with updated national policy.

We look forward to continued engagement to ensure that Clare can deliver the homes, infrastructure, and employment opportunities required to support sustainable growth. We would be happy to have further engagement on this submission if you require any further information or clarification.

Yours faithfully



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Joanne Treacy,  
CIF Director Southern Region