

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029
Date: Tuesday 7 April 2026 22:32:25
Attachments: [REDACTED]

Dear Sir/Madam,

Please find attached a submission on Proposed Variation No. 1 to the Clare County Development Plan 2023–2029, specifically relating to the proposed zoning changes within Volume 3b, Shannon Municipal District Plans, for Sixmilebridge.

Kind regards,
Damien

**Submission on Proposed Variation No. 1 to the Clare County Development Plan 2023–2029
Re: Sixmilebridge Settlement, including Ballysheen (Sites R10, R12, R13)**

Dear Sir/Madam,

This submission relates to Proposed Variation No. 1 to the Clare County Development Plan 2023–2029, and specifically to the proposed zoning changes within Sixmilebridge, including lands identified as R10, R12 and R13.

At the outset, it is important to state that this submission does not object to all housing development in principle. The need to provide additional housing in general, including within towns such as Sixmilebridge, is acknowledged. However, such development must be properly planned, infrastructure-led, sequential, and consistent with national and regional planning policy, including the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES).

Notwithstanding this, this submission formally objects to the proposed zoning of lands at R10, R12 and R13.

The issue is therefore not whether housing should be provided, but whether the scale, location and timing of the proposed zoning are appropriate and consistent with the requirements of proper planning and sustainable development.

It is submitted that the proposed variation, in its current form, gives rise to issues of prematurity, overdevelopment, unsustainable settlement expansion, infrastructure deficiency, and environmental risk.

Excessive and disproportionate scale of proposed zoning

The proposed variation represents a very substantial increase in residentially zoned land in Sixmilebridge. The Shannon Municipal District summary table PA 3b - 1a shows Sixmilebridge increasing from approximately 8.05 hectares of residentially zoned land to 32.22 hectares of low-density residential land, representing an increase of over 300% in the scale of land being made available for housing growth.

This is a dramatic and disproportionate increase for a settlement of this scale and is not supported by a sufficiently clear evidence-based justification in terms of infrastructure capacity, social provision, or sequential settlement growth.

There is no corresponding expansion or funding in place for local amenities such as parks or services to support the proposed increase in housing and any current plans are based on funding applications with no guarantee of securing the required funding.

It was recently pointed out at a town meeting that some projects that were supported by Clare County council in the “Sixmilebridge Town Centre First Plan” have already been denied funding to proceed after the applications were submitted.

Existing infrastructure already under strain

Although the document outlines a range of proposed objectives, including improvements to pedestrian and cycling access and the requirement for Traffic and Transport Assessments, there are already significant shortcomings in existing infrastructure. The council has not kept pace with the necessary upgrades to current basic facilities. Many footpaths remain in poor condition with examples such as mismatch or deteriorating tarmacadam paths, particularly affecting people with disabilities, while some areas within the town boundaries lack adequate street lighting or footpaths altogether. In addition, there are insufficient safe or accessible bus stop locations for both children, the elderly and those with disability/mobility issues, with no planning for how routes will progress to any future planned housing areas.

There are already numerous examples across the town of housing developments proceeding without adequate street lighting or pedestrian infrastructure leading to them, demonstrating a clear gap between development and the provision of essential supporting services first. Given this and the existing deficiencies mentioned above, it is difficult to see how the council will effectively deliver on the proposed plans for the future supporting infrastructure being mentioned in the variations. There is a real risk that progressing with these variations will further delay addressing current issues and ultimately compound the problems rather than resolve them.

Removal of Strategic Residential Reserve safeguards

The proposed variations remove the Strategic Residential Reserve approach and converts lands to immediately developable residential zoning as noted in R10 and R12.

The removal of phasing mechanisms increases the risk of premature and uncoordinated developments and goes against existing national guidelines.

Development in the wrong direction (settlement expansion into countryside R10/R12/R13)

In particular, the example at Ballysheen/R10 direction moves the settlement out beyond the existing Sixmilebridge boundary and into the countryside on a historical area with a single lane road, rather than consolidating growth in a more logical and better serviced direction.

This represents unsustainable expansion into a rural landscape. The issue is not simply that there is too much development, but that the proposed expansion is also directed possibly toward the wrong side of the town.

Availability of more suitable lands (Cratloe/Limerick side)

While this submission does not object to housing in principle, it is considered that more suitable lands exist on the Cratloe/Limerick side of Sixmilebridge.

Those lands are preferable because they:

- are closer to the functional town area
- are served by a wider road network which can account for traffic
- already benefit from existing footpaths and street lighting
- lie within the reduced speed limit zone, and are therefore regarded locally as being part of the town
- are closer to the recently permitted supermarket developments, thereby reducing the need for additional traffic to cross the already constrained bridge within the town

By contrast, 8 of the 9 proposed development variations requires movement of people across existing constraints such as the bridge to access key services i.e GP services, new supermarkets etc., and these variations also extends the town into existing rural edge locations.

Lack of Supporting Infrastructure

The proposed variations places emphasis on the relationship between population growth and the provision of infrastructure, services, and amenities. However, in the case of Sixmilebridge, the scale of proposed zoning is not supported by clearly identified or committed social and community infrastructure to accommodate that level of growth.

The proposed residential expansion is not matched by the provision of essential services or the allocation/zoning of suitable lands for future needs, including:

- **Future secondary school capacity** – Approximately 430+ students are currently transported by bus each day to schools in Shannon/Ennis/Limerick during peak travel times, placing pressure on schools that are already struggling with capacity. For example, in the past year alone, students from Sixmilebridge have been placed on waiting lists for secondary school places in Shannon, with some assigned positions as high as 100 to 130. It is not a question of *if* a new secondary school will be required, but *when*. The concern remains whether appropriate land will still be available when that need arises.
- **Healthcare provision** – There is no land proposed or zoned for future healthcare services, which will be essential to support a growing population.
- **Community facilities** – There are no clear plans in place for the upgrade or zoned areas for expansion of community facilities to support both the existing ageing population and future residents.
- **Recreation and amenity areas** – There is no definitive land zoned for recreational or amenity spaces on either side of the town aside from existing sports fields which are community run and funded. By comparison, Newmarket-on-Fergus and Quin, despite having smaller populations, already have parks and/or playgrounds, while Sixmilebridge has none. As a result, residents must travel, typically by car, to access these facilities. This leaves those without access to transport, particularly younger children, at a disadvantage. Future developments will replicate this issue, potentially contributing to increased social challenges, including anti-social behaviour.
- **Anti-social behaviour** – This is already an ongoing and rising issue in Sixmilebridge, compounded by a lack of varied facilities and parks, and the lack of full time Garda presence with a reported 34% increase in crime Sixmilebridge in 2024.

Unsustainable Transport Patterns and Inadequate Public Transport Provision

The proposed variations fail to demonstrate compliance with national transport policy.

In practical terms:

- There are no adequate bus stop facilities within the town
- Existing bus services are already operating at peak capacity at work/ school times, including approximately 400+ students using morning and evening services
- There is no evidence of increased service provision or capacity in line with either existing housing underway or future proposed planning
- Trains do not travel to Shannon, a major location of local jobs for the town so car dependency will only increase

The proposed variations fail to demonstrate compliance with national transport policy and does not provide a credible framework for sustainable mobility. In practical terms, there are no adequate or properly designed bus stop facilities within the town, while existing bus services are already operating at peak capacity during school and working hours, including approximately 400+ students relying on morning and evening services. These are also peak times for travel of workers living in the town, but these buses also share a route with Limerick which means not all seats are available when the buses arrive in Sixmilebridge.

There is also no evidence of any planned bus stop locations in line with any existing or new housing locations. Lack of engagement with transport companies such as Bus Eireann before any planning takes place means that future bus stops become an afterthought when houses are already in place. Currently, Bus Eireann refuses to facilitate pickup/drop off for secondary school students on one side of the village, forcing children to cross the narrow bridge to access services. For those who don't walk, this means parents need to drive their children to the designated drop off points.

As a result, the proposed developments will reinforce unsustainable transport patterns. It is likely that many future residents will be commuting to key employment centres such as Limerick, Shannon, or Ennis.

However, there are no corresponding zoning provisions for commercial or employment generating uses within the town to support local job creation or reduce the need for some residents to travel outside the town for work.

In fact, some commercial properties on the main street have already been granted permission for conversion to residential use, further reducing the town's capacity to support local businesses and services. This not only limits economic growth but also increases reliance on travel outside the area for everyday needs, including access to shops, services, and social amenities. The lack of commercial zoning and over zoning for residential also reduces the Council's ability to generate revenue through rates which could then be used to support infrastructure and growth of amenities in the town.

Collectively, these factors will result in increased dependence on private car use, lock in car-dependent development patterns, and increase isolation of those who do not have ready access to private vehicles.

Transport and bridge constraint

Critically, the existing single bridge is already operating under significant pressure, and the proposed developments will further increase traffic demand. This is particularly concerning given that the majority of retail and service infrastructure including the town chemist, medical practices, cafés and barbers is located on one side of the town, with no corresponding provision proposed on the Shannon side to support balanced growth. This imbalance is further compounded by the presence of one existing supermarket and two additional recently permitted developments on the same side.

As a result, residents of 8 of the proposed 9 variations will be required to cross the bridge to access essential services, placing additional strain on an already constrained crossing. The cumulative traffic impact of these developments has not been adequately assessed, and in the absence of alternative routes or additional crossing points, congestion is likely to intensify. Proposals discussed at a recent town meeting to introduce traffic lights at the bridge, while intended to improve pedestrian safety, are also likely to further compound traffic delays rather than resolve them.

Rural Character and Road Safety (L7024 / R10)

R10 Expansion Proposal:

The lands identified at R10 are accessed via the L7024, a narrow rural road network that was not designed to accommodate high volumes of residential traffic. The road has limited width and offers no capacity for expansion due to the presence of historic stone boundary walls and physical constraints such as hedgerows. There is insufficient space for two-way traffic, and the addition of pedestrian and cycling traffic on to it from the proposed R10, R12 and R13 variations will put these users' safety at risk.

This route is regularly used by pedestrians for recreational walking and for access to a local historic church and graveyard. The area is of significant historical importance, with the presence of church ruins dating back over 1,000 years.

In addition, sections of the road, particularly on the Kilmurry side, are already experiencing subsidence due to increased traffic loading, combined with O'Garney river causing erosion during periods of flooding. This further undermines the structural integrity of the road and raises serious concerns regarding its long-term capacity to safely accommodate additional traffic which already includes regular farm traffic, the local Mart traffic, and the existing farms in the area all of which are essential to the rural farming community.

The combination of increased vehicular demand, restricted road width, existing pedestrian usage, and ongoing structural deterioration would significantly increase the risk of vehicle - pedestrian conflict and

presents a clear road safety concern. These dangers will be compounded if the proposed residents in R10 would use the L7024 as a pedestrian / cycle crossing point to R13/R12 or for vehicles to access.

At times, cars are found to be travelling at speed on L7024 as this road can be used as a short cut for vehicles due to congestion in the town centre on the bridge. This places children and vulnerable residents at an increased risk whilst walking or cycling on this rural road. The inclusion of major housing developments on this narrow rural road would incrementally increase this risk.

Settlement Capacity Audit inaccuracies (R10)

The Settlement Capacity Audit identifies R10 as serviced; however, this is inaccurate:

Footpath provision in the area is incomplete and fragmented, with paths extending only as far as the school on one side and the entrance to O 'Garney Heights on the other, resulting in no continuous pedestrian network inside the current village traffic zone; this is further compounded by the limited road width on L7024, which restricts the potential for any meaningful upgrades due to existing housing and historical stone walls, and the absence of adequate wastewater infrastructure, despite indications to the contrary the data graph on page 27 of volume 3B Shannon Municipal District Settlement Plans.

Biodiversity and environmental concerns

It is noted that previous planning applications in Sixmilebridge for housing developments have been refused due to concerns regarding ecological impacts and insufficient environmental assessment.

The zoning of lands at R10 and R12, without detailed ecological assessment at rezoning stage, is inconsistent with the requirement for evidence-based environmental assessment. Wildlife travelling through the ecological corridors of the countryside to access the O'Garney River could be disrupted by this development, and this will have adverse impacts on local biodiversity i.e. foxes, badgers etc. that currently inhabit the area.

Failure to achieve proper planning and sustainable development

The proposal, as currently presented, gives rise to a number of significant planning concerns. It represents overdevelopment in the context of the scale and capacity of the existing settlement, while also being located in areas that are not appropriate or sustainable for such expansion. The lack of supporting infrastructure further exacerbates these issues, with clear deficiencies in transport, services, and community provision. In addition, the development would contribute to increased traffic congestion, placing further strain on already constrained road networks. Finally, there are notable environmental risks associated with the proposal, including potential impacts on local ecosystems and the absence of sufficiently detailed assessment to demonstrate that these can be adequately mitigated.

Conclusion and recommendation

It is respectfully requested that in light of the issues outlined above, that the proposed zoning at R10, R12 and R13 in Variation No. 1 Volume 3B to the Clare County Development Plan 2023–2029 is premature, unsustainable, and contrary to the principles of proper planning and sustainable development.

The proposals represent a significant and disproportionate increase in zoning (in excess of 300%) without the necessary supporting infrastructure, and they materially contravene key objectives of the Clare County Development Plan 2023–2029, as well as national and regional planning policy, including environmental, biodiversity, and climate frameworks.

Accordingly, it is respectfully requested that the Elected Members reject these specific zonings and remove lands at R10, R12 and R13 from this and any future adopted Variation. It is further recommended that the overall scale of 3B Variation plan/ zoning be reconsidered pending the delivery and demonstration of adequate infrastructure, that more appropriate and better serviced lands be prioritised, and that a phased and infrastructure-led approach to development be reinstated.

We would welcome the opportunity to discuss this submission further.

Yours sincerely,

Damien and Sue O'Connor

