

Planning Department
 Clare County Council
 New Road
 Ennis
 Co.Clare



**RE: Variation No. 1 Clare County Council Development Plan 2023-2029, Vol.3a(iv)
 adoption of Ennis Local Transport Plan - Connecting Tulla Road to Gort Road Ennis.**

Dear Sir/Madam

I, the below signed, am objecting to the proposal to connect the Tulla Road to the Gort road via the Corrovorrin Graveyard pathway in the Corrovorrin Estate.

The main reasons for my objection to the proposed pathway is as follows, and I will elaborate on these further:

1: Established cycle route already in existence - There is an established cycle route connecting the Tulla Road to the Gort Road running down St. Senans Road, through The Crescent, Ivy Hill and onto the Gort Road. There is adequate signage in place and this route is well used by both walkers and cyclists on a daily basis. Joining into this established route would be the best use of existing infrastructure.

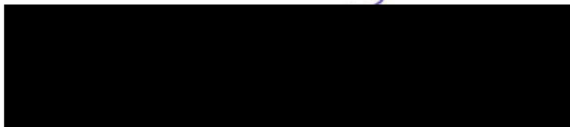
2: Traffic Safety - The junction of the Tulla Road and Kevin Barry Avenue is very congested and at times unsafe due to the narrow road and the parking spaces for the shop. Adding cyclists/walkers into this traffic would be entirely inappropriate from a safety aspect.

3: Anti-Social behaviour - There is a long history of Anti-social behaviour along the Corrovorrin graveyard path. The closure of the field belonging to St Anne's school has alleviated a great deal of this and opening this area back up would without a doubt cause rise to the return of such behaviour which has caused great distress to the residents of Corrovorrin Drive whose houses back onto this route.

Name: Amanda Kelly

Date: 3/4/2020

Address:



Signature: [Handwritten Signature]

Additional information supporting objections to:

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The main reasons for my objection to the proposed pathway is as follows, and I will elaborate on these further:

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Please read enclosed letter.

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Please read the attached letter.

The Corrovorrin Estate.

Established in the 1970's. Corrovorrin has long been a family oriented estate, with green open spaces and a great sense of community. Many people who grew up in Corrovorrin have returned to raise their own families alongside parents and grandparents. One of the elements of Corrovorrin that gives it such a sense of community is it's self-contained nature, with only one main road in and out of the estate. Opening up a walkway from a busy main road into Corrovorrin will decrease this feeling of security greatly.

1. Existing established route from Tulla Road to Gort Road.

There is an existing cycle/walking route from the Tulla Road through to the Gort Road and Ivy Hill, which is clearly sign posted with walking and cycling times. This route is well used by many on a daily basis. Surely the best use of existing infrastructure would be to connect the newly developed cycle route on the Tulla Road to the existing cycle route running down St Senan's Road and The Crescent through to the Gort Road, especially considering the new cycle route works will be finishing at the junction of Kevin Barry Avenue and the Tulla Road.



Signage on The Crescent indicating walking & cycling times from Gort Road to Tulla Road



Signage on Ivy Hill showing walking & cycling times from Tulla Road to Gort Road and vice versa



2. Junction of Tulla Road and Kevin Barry Avenue

The junction of the Tulla Road and Kevin Barry Avenue is constantly busy due to the shop on the corner. There are 14 parking spaces, and cars also park on the opposite side of the road, sometimes on the pavement, when there are no spaces available. There are vehicles reversing in and out of spaces and this leads to significant congestion at times. To add a cycle/walking route into this area would be hazardous to anybody trying to use it. There is a zebra crossing just past this junction which would provide safe access from the Tulla Road to St Senan's Road where there is a sign posted cycle and walking route to both the Gort Road and Ivy Hill.



Zebra crossing on Tulla Road and signage for route through to Gort Road

3. Anti-Social Behaviour on Corrovorrin Graveyard path

There is a long, documented history of anti-social behaviour along the Corrovorrin Graveyard path, a lot of which was generated by people being able to walk through the field during the summer months and congregating in the area. This resulted in considerable amounts of rubbish, graffiti and noise, particularly during the summer months, which caused great distress and loss of amenity to the residents of Corrovorrin Drive whose rear gardens back onto this field. St Anne's school erected gates at the entrance to the field from the graveyard path and this has greatly alleviated the amount of anti-social behaviour occurring. Re-instating any form of public access to this field will undoubtedly lead to a recurrence of this behaviour, something which the residents of Corrovorrin Drive are strongly opposed to.

Flood/Riparian zone

The field running from the Corrovorrin graveyard along the back of Corrovorrin Drive is within Flood Zone A and is a Riparian zone. Zoned as open space it is home to wide variety of wildlife including protected species such as Otters and Kingfishers (which are Amber-listed (Birds of Conservation Concern in Ireland)). There are also regular sightings of bats in both the graveyard and the field. Any kind of development in this field will cause significant disruption to the feeding and breeding grounds of these and many other species of wildlife who have flourished in this undisturbed environment over the last few years.

Extract from an article in the Clare Echo 30th September 2024:

"Acting senior executive planner with Clare County Council, Candace Ingram outlined, "The Corrovorrin river plays a vital role in the overall water quality of the River Fergus. To protect the river and the function of the river corridor as both a flood plain for the Corrovorrin River and its function as a riparian zone, the Clare County Development Plan 2023-2029 includes policy and land-use zoning to protect both the river and its riparian corridor by zoning it as Buffer space from Kevin Barry Avenue to the confluence with the Fergus".

She explained, "The Corrovorrin River riparian zone upstream of Kevin Barry Avenue to Dulick is zoned as Open Space which also influences the nature of future development that can be accommodated. The objective of zoning lands 'open space' is to retain it as an undeveloped open space mainly for passive open space related activities. As the Corrovorrin River is completely within Flood Zone A, which will influence the potential for future development along the river corridor, building climate change resilience into the County Development Plan was a central consideration to both the zoning of lands and the development of objectives for future sustainable growth. All land use zonings were assessed from a flood risk and environmental perspective to ensure resilience and adaptation were accounted for throughout. This led to the inclusion of significant areas of buffer zone which will be protected due to their location adjacent to river channels, the presence of important wildlife corridors or their importance for biodiversity".

This land is an essential part of the conservation of the wildlife of the River Fergus and as such is entirely unsuitable for development.



CLARE COUNTY COUNCIL
CLARE COUNTY DEVELOPMENT PLAN 2023-2029

Clare County Development Plan 2023 - 2029

Ennis

Legend

- Clarecastle Settlement Boundary
- Ennis Settlement Boundary

Land Use Zoning

- Existing Residential
- Residential
- Low Density Residential
- Strategic Residential Reserve
- Mixed Use
- Commercial
- Tourism
- Enterprise
- Light Industry
- General Industry
- Industry
- Community
- Recreation
- Open Space
- Agriculture
- Buffer Space
- Airport
- Maritime / Harbour
- Neighbourhood Centre
- Transport Utilities
- University Zone
- Utilities

General

- Water Bodies
- Car Park
- Ennis Plan Boundary

Flooding

- Flood Zone A
- Flood Zone B



Extract from Clare Development Plan map 2023-2024 showing Corrovorrin area as Flood Zones A & B along with open space zoning of field behind Corrovorrin Drive

Date: April 2024

Not To Scale



Extract from Ennis Local Transport Plan - Natura Impact Statement

We also note in the Natura Impact Statement of April 2025 the issue is raised that the proposal has the potential to cause disruption to Lesser Horseshoe bats.

| OPTION REF. | LOCATION | DESCRIPTION | Located within 6km of a lesser horseshoe bat roost SAC | Hydrological pathway to European Site whose conservation objectives are reliant on surface, ground and coastal water quality | Direct habitat loss of European Site | Direct or indirect disturbance to European Site habitat and/or species | Direct or indirect impacts to European Site from invasive species |
|----------------------|-----------------|---|---|--|---|--|---|
| Active Travel | | | | | | | |
| | | | | Low risk to SAC. | | | |
| WC215 | Corrovin Fergus | Bridge - Install Bridge over Fergus Minor connecting Gaelscoil St Clare's & Corrovornin | Yes. Provision of public lighting is identified as an element of risk | Yes. hydrological pathway to Lower River Shannon SAC at bridge crossing . | No. Route is located outside of the Lower River Shannon SAC boundary. | Yes. Provision of public lighting is identified as an element of risk | Yes. Potential could arise in event that stands of non-native invasive species are present along route or such species are introduced during works for the route. |

Slow-flying bats such as *Rhinolophus* (horseshoe), are light-averse. Street lights along roads, rivers, and hedgerows (essential commuting corridors) create light barriers that these bats will not cross. This isolates populations and cuts off access to foraging areas, forcing them to use longer, less efficient routes.

While lights attract insects (e.g., moths, midges), creating a temporary food source, they also act as a "vacuum" that draws insects away from natural, dark surrounding areas. This leaves unlit areas with significantly fewer prey, starving out the light-averse species.

New lighting infrastructure near watercourses also poses a significant risk of disturbance to otters (*Lutra lutra*) and disruption to aquatic ecosystems. As nocturnal, semi-aquatic predators, otters rely on dark, quiet bankside habitats for resting (couches) and breeding (holts).

Key Impacts of New Lighting on Otters & Fish Habitats:

Artificial light can lead to habitat fragmentation, discouraging otters from using established commuting routes or foraging in familiar areas. It can alter their natural nocturnal behaviors and reduce breeding success if light spills onto holts.

This vital area of bio-diversity would be greatly impacted by the addition of any artificial light, causing significant disruption to many protected species.