

8th of September 2023

Clonmel Local Area Plan,
Planning Department,
Tipperary County Council
Civic Offices,
Limerick Road,
Nenagh,
Co. Tipperary,
E45 A099

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Dear Sir/Madam,

RE: DRAFT CLONMEL LOCAL AREA PLAN 2024-2030

This submission is made by Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House, Jocelyn Street, Dundalk, County Louth, [REDACTED] of [REDACTED], and relates to the above proposed Clonmel Local Area Plan 2024-2030.

Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth. In keeping with the provisions of the Data Protection Act, full details of our submission are attached.

Yours sincerely,

[REDACTED]

Stephen Ward



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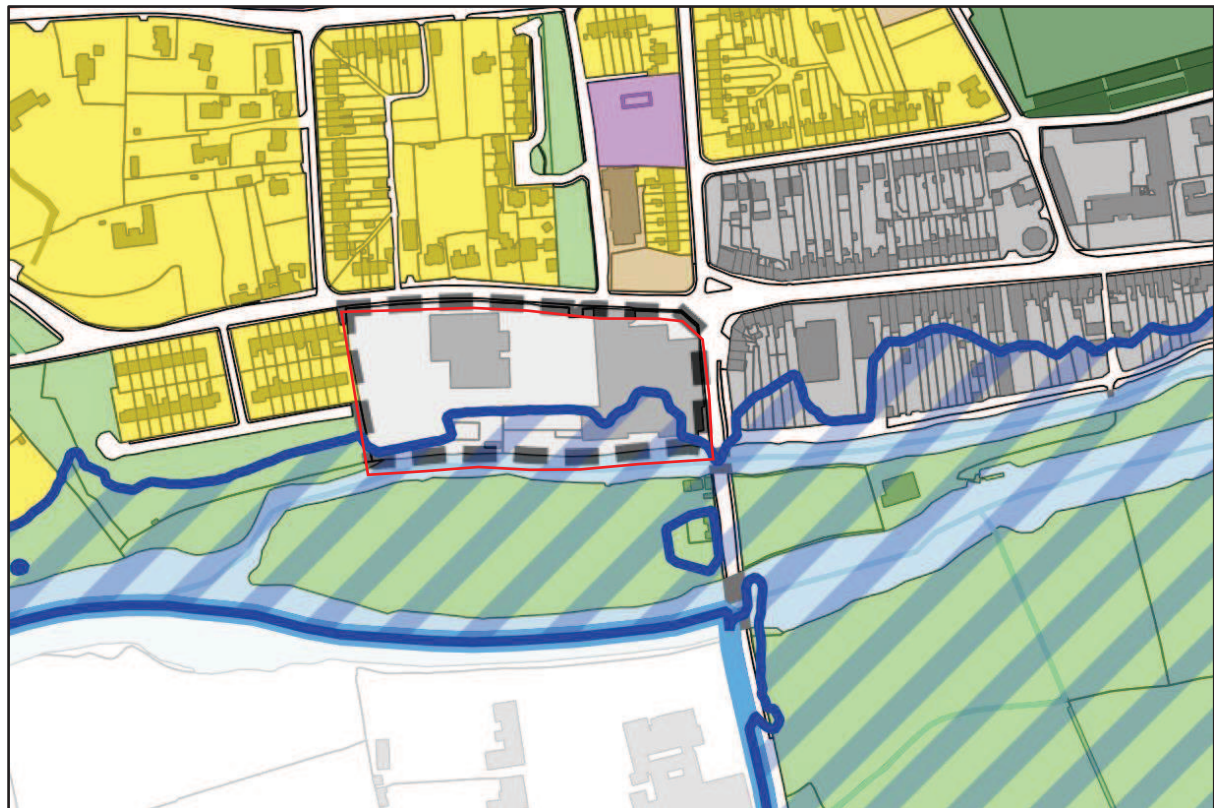
1.0 INTRODUCTION

- 1.1 [REDACTED] has appointed Stephen Ward Town Planning and Development Consultants Ltd to make this submission in relation to the Draft Clonmel Local Area Plan 2024-2030 (LAP). [REDACTED] [REDACTED] lands outlined in red on figure 1. The lands are known as the Former Fair Oaks Food Factory and are located at Abbey Road / Convent Road Clonmel. This site has recently been granted planning permission for a residential led mixed use development under P.A. Ref. [REDACTED] as noted at section 2.4.2 (page 19) of the draft LAP.
- 1.2 [REDACTED] support the ‘Regeneration’ zoning objective applied to their lands but seek clarification on the maximum housing delivery capacity set out at Section 2.4.3 of the LAP. This is considered necessary and appropriate having regard to the recently permitted development of the lands which incorporates 86 dwellings.
- 1.3 Please address all correspondence relating to this submission to Stephen Ward Town Planning and Development Consultants Ltd, Jocelyn House, Jocelyn Street, Dundalk, Co. Louth.

2.0 GROUNDS OF SUBMISSION

Residential Land Use Zoning – Clarification of Objectives

- 2.1 The subject site is zoned ‘Regeneration’. Lands with this zoning are described by the LAP *“Specific underused areas of the town centre-built fabric with close physical links with the centre and targeted for significant redevelopment, consolidation and regeneration activity. New development shall be broadly in line with ‘Urban Core’ in nature with a focus on connectivity and linkages with the Urban Core.”*
- 2.2 The RE zoning objective is to *“Provide for targeted enterprise and/or residential-led regeneration within the consolidation area on underused sites.”*
- 2.3 We note the permitted development (P.A. Ref. [REDACTED]) is fully in keeping with the new zoning objective.



- Existing Residential
- New Residential
- Strategic Reserve
- Community Services and Infrastructure
- Urban Core
- Regeneration
- Mixed Use
- Employment
- General Industry
- Amenity
- Open Space & Recreation
- Town Environs
- Clonmel LAP Boundary
- Strategic Employment Sites
- Flood Zone A
- Flood Zone B

2.4 The LAP details the live planning permission on the █ site and the 86no. residential units to be potentially provided at section 2.4.2. Section 2.4.3 of the LAP then details the plan’s approach to lands on which ‘New residential use’ is permitted having regard to the Core Strategy of the Tipperary County Development Plan. Table 8 is entitled “*Land use zoning that can accommodate new residential growth*”. Within this table, the ‘Regeneration’ land zoning (6.79ha in total) has a “*maximum housing delivery capacity*” calculated at 50% equating to 85no. units.

Land zoning	Area (ha)	Maximum Housing Delivery Capacity
New Residential	96.04	Calculated at 100% Residential = 2,401 units
Urban Core	56.17	Calculated at 30% Residential Share = 421 units
Mixed Use	20.91	Calculated at 30% Residential Share = 157 units
Regeneration	6.79	Calculated at 50% Residential Share = 85 units

Table 8: Land use zoning that can accommodate new residential growth

2.5 It is submitted that the development approach to lands zoned Regeneration should be clarified in the text of the draft LAP. The Regeneration zoning objective is to *“Provide for targeted enterprise and/or residential-led regeneration within the consolidation area on underused sites.”* These lands are regarded by the LAP as central to the LAP compliance with Strategic Objective No. 1 (Compact Growth) of the NPF. In order to encourage and facilitate development on regeneration / brownfield lands located towards the core of the settlement we submit it would be in the interests of the proper planning and sustainable development of the area if there was no cap or limitation placed on the residential capacity on lands zoned ‘Regeneration’. Basically, we submit it is always a good thing to see regeneration of lands and placing a cap on these sites might only unnecessarily inhibit residential development on these ‘Regeneration’ lands. The provision and level of mixed-uses can be controlled via the development management system on a case-by-case basis.

2.6 **We would respectfully suggest that the wording to the ‘Regeneration’ row to Table 8 is changed to read – “Estimated Residential Share c85 units. This is not a cap or a capacity estimate and the level of residential development within the Regeneration sites will be determined via the development management system on a case by case basis”**

Land zoning	Area (ha)	Description
New Residential	96.04	For New Residential use
Strategic Reserve	43.15	Long-Term Strategic and Sustainable Development Site. Sites that will deliver housing within the subsequent development plan period (i.e. more than 6 years). (4.4.4 of the Development Plan Guidelines)
Mixed Use	20.91	Mixed use, including Residential
Regeneration	6.79	Mixed use, including Residential
Urban Core	56.17	Mixed use, including Residential

Table 9: Land Use Zoning Areas (Ha)

- 2.7 Table 9 of the LAP is entitled ‘Land use zoning areas’. In this table the land zoned ‘Regeneration’ is described as “*Mixed use, including Residential*”. It is submitted that this wording should be revised so that it is consistent with the zoning objective which is for regeneration to be “residential-led”. **We would respectfully suggest wording to the Regeneration row (Description) such as “Residentially Led Mixed Use”.**
- 2.8 An example of the need for a flexible approach to the expected residential outcome for Regeneration lands is that [REDACTED] lands extends to 2.08ha and has been granted planning permission for 86no. units in addition to retail units and a café. On the basis of Table 8 as it currently stands, it might provide difficult to amend the permitted development to provide and an unnecessary restriction might apply to other sites in terms of residential development, thus undermining the overall development of these Regeneration sites. Such an outcome would be unintended and contrary to the zoning objective and could significantly reduce the development potential of other lands where this zoning objective is applied.

3.0 CONCLUSION

- 3.1 In general, [REDACTED] welcomes the land-use provisions of the Draft LAP as they relate to its lands at Convent Road / Abbey Road, Clonmel. We would suggest that there is no ‘cap’ placed on the residential element of proposals for its lands and submit it is better for the quantum of residential development for the site to be determined via the development management system. This submission makes some suggestions as to how this might be approached in the LAP.

[REDACTED]
[REDACTED]
Stephen Ward