



h w p l a n n i n g

**Submission to Draft Clonmel and  
Environs Local Area Plan 2024 -2030**  
Employment Land Provision

**Client:** [REDACTED]

September 2023



**Connecting people.**  
**Connecting places.**



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# Introduction

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## 1.1 Submission Purpose

This submission is being made on behalf of [REDACTED] in response to Tipperary County Council's invitation for submissions to the Public Consultation process for the Draft Local Area Plan (LAP) for Clonmel and Environs 2024 – 2030. This submission is made in respect of the employment land provision in general and specifically in relation to the masterplan lands for the Ballingarrane Strategic Business, Science and Technology Campus identified in Figure 01 below. These lands are jointly in the ownership of [REDACTED] and the [REDACTED].

Our client commends the detailed research undertaken by the Council in the LAP Appendix 1 - Serviced Land Assessment (SLA) and Appendix 2 - Local Transport Plan (LTA) to underpin the policies of the Draft LAP. In line with national and regional policies, they support the juxtaposing of residential and employment lands as outlined in the SLA in the interest of compact and sustainable growth. They welcome the Draft LAP's proposed Strategic Employment Site zoning of the Ballingarrane masterplan area, which supports compact growth, while being one of the last remaining large employment landbanks in the South of Ireland. They also concur with the Council's view that Clonmel and its Environs is a regional economic driver and support the Key Town's recognition as a strategic employment location.

In this submission [REDACTED] set out to demonstrate the vital importance of the Strategic Employment Site zoning of the Ballingarrane masterplan area and request that the Council further support its future development in the final adopted development plan. Specifically in relation to prioritising the delivery of enhanced active travel options to the site.

While the proposed CL9 town bus route, as outlined the LTP, which will serve the site is welcomed, it is requested that the frequency is enhanced beyond the proposed two return journeys daily. In addition, [REDACTED] welcomes the proposals to extend the existing stretch of segregated cycle track serving the site into the town centre and to adjoining employment and residential zoned lands along the Cashel Road (AT 56) and the proposed enhanced cycle connectivity from the site along the Cahir Road (AT 43 and AT 54) and Glenconner Road (AT 83). In combination, the delivery of these objectives will contribute to the realization of a sustainable modal shift by future employees of this future employment hub and support the achievement of local Climate Change reduction targets. Furthermore, in view of the crucial role that Clonmel plays in the economic development of County Tipperary, [REDACTED] welcome the opportunity to work with the Council in an on-going manner to identify further strategic landbanks to accommodate the key Town's future employment requirements.

## 1.2 The Subject Lands

As indicated in Figure 01 the Ballingarrane Masterplan Area is located in the northwest of the Clonmel. It is within a 10 minutes' cycle of the formal town centre. The area is situated immediately north of the

N24 Waterford to Limerick national road that spans the northside of the town, and provides easy access to the Cashel Road Industrial Estate, the Ard Gaoithe Business Park and a number of existing and zoned residential areas. The lands were previously the demense of the historic Ballingarrane House, which remains a dominant architectural feature. The overall estate comprises 121 hectares, of which [REDACTED], [REDACTED] and the remaining [REDACTED]. Since the 2013 LAP, development of the Questum Acceleration Centre, the Incubation Support Unit and other subsequent development has reduced the remaining employment zoned lands to 105 hectares in the Draft LAP. In addition, there is a Part 8 application underway for the construction of 10 no. modular multi-purpose buildings within the masterplan area.



Figure 01: Site Location Map

The other principal employment zoning in the town is the c. 132 hectares of land at the Ard Gaoithe Business Park. These adjoin the Abbot Vascular and Boston Scientific campuses. In May 2023 Boston Scientific announced proposal for further expansion in the Ard Gaoithe Business Park.

### 1.3 [REDACTED] Ambition for the Mid-West Region

[REDACTED] is the state agency with responsibility for winning Foreign Direct Investment (FDI) for Ireland. These investments cover a broad spectrum of activities including manufacturing, research development & innovation (RD &I). This is in addition to business services and results in significant capital investment and employment creation by multinational client companies in Ireland.

[REDACTED] is committed to the pursuit of more balanced, compact regional development, with 52% of new investments in 2022 going to regional locations outside of Dublin. Maximising the contribution of FDI has always been a key focus of [REDACTED] in seeking to spread the benefits of FDI across Ireland. In 2022 direct employment in [REDACTED] companies reached 301,475, representing an increase of 9% from 2021 and the highest increase in FDI employment in a single year, with particular reference to the significant recent large-scale investment secured in the Mid-west region, composed of Counties Tipperary, Limerick and Clare. In 2023 there were 154 [REDACTED] supported companies in the Mid-west region directly employing 26,004 people and generating indirect employment of 20,803 persons. The Mid-west region is now recognised as a global cluster location of choice for

advanced manufacturing including both life science and semiconductor manufacturing multinationals.

Within this region County Tipperary is home to some of the world's largest pharmaceutical, biosciences, manufacturing and financial services sectors and hosts Abbott Vascular and Boston Scientific in Clonmel, Fiserv, in Nenagh, Waystone in Cashel and MSD in Ballydine. Altogether 15 FDI companies currently employ 4,568 people in the County, the majority of which are based in Clonmel, with Boston Scientific in Clonmel announcing in 2023 plans to recruit a further 400 employees.

The Mid-west region's track record of attracting a significant quantum of employment and the attractiveness of the region for FDI were emphasized in the context of the [REDACTED] 2021 Strategy, which stated that:

*'The FDI performance in the region has been strong over the past five years with employment among [REDACTED] clients increasing by 22%. The Mid-West Region has an impressive base of existing FDI companies across key industry sectors, with recent investments of scale in Technology, Life Sciences and International Financial Services.'*

Fundamental to maximising the impact of FDI in the region and to ensuring the continued significant large-scale investment is the availability of sufficient zoned, serviced and accessible land in strategic locations. This is the principal factor that will continue to establish the Mid-west and Clonmel as a compelling location option for multinationals in the mobile FDI marketplace. The availability of zoned employment land in advance of demand is a key element to achieving this. [REDACTED] owned lands to support future FDI development in Tipperary include c. 26 hectares of land in Ballingarranne in Clonmel and Knockanrawley in Tipperary Town.

#### **1.4 Clonmel – a Regional Economic Driver**

The Tipperary County Development Plan 2022 (CDP) specifically earmarks Clonmel for population and economic growth and notes that:

*'Tipperary's Key Towns, and in particular Clonmel, have been identified as regional economic drivers, and are targeted for significant population growth. The Council has, and will continue to work with national and regional economic stakeholders, to identify strategic employment locations, to provide opportunities for investment in new businesses and to support emerging sectors of the economy.'*

The CDP has an ambitious population growth target for Clonmel of 30% (5,142 persons) by 2031. To underpin this, it sets out a Strategy for Growth for Clonmel in which it is recognised as a Strategic Employment Location targeted to:

*'attract a range of large employers and regional services, amenities and infrastructure. The Council will continue to support the role of Clonmel as a strategic location for large-scale industry, including life-sciences, technology, food production and manufacturing.'*

The CDP also acknowledges that 'Clonmel is a self-sustaining regional economic driver, and a key location for investment and choice, and will support the overall development of the southern region'. The Draft LAP reflects this and sets out an objective to build upon and exceed the current strong jobs ratio in Clonmel of 1.39.



However, we note that despite this acknowledged strategic employment role, page 12 of the SLA notes that '*No additional areas have been identified for employment use in Clonmel*'. While significant lands were zoned for Industry, Employment and Commercial use in the 2013 LAP (c. 545 hectares), the SLA estimates that only c. 303 hectares of these remain available, with many of these sites being of a scale unsuitable for FDI development. [REDACTED] considers it vital that an appropriate quantum of employment zoned lands of scale be identified to facilitate employment growth in Clonmel and the Mid-west region commensurate with projected population increase. The development of identified lands can then be plan-led over a medium-term horizon in collaboration with national agencies and local planning authorities.

# Planning Policy and Context

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## 2.1 National Planning Framework (NPF)

The NPF set ambitious population and jobs targets for the Southern Region of 340,000 – 380,000 additional people and 225,000 additional jobs by 2040 (NPO 1b and 1c). The NPF Revision process is underway which will include an assessment of implementation to-date. In order to deliver upon these ambitious targets, it is imperative that sufficient and appropriate employment zoned lands are made available in the short-term.

## 2.2 Southern Regional Spatial and Economic Strategy (RSES)

The RSES recognizes Clonmel as a Key Town, which falls within the South-east Strategic Planning Area (SPA). It is described as a vibrant and thriving town, which forms part of a strategic inter-regional road and rail corridor between Waterford and Limerick. It notes it is a Major Employment Centre with a total jobs number of 7,306 in 2016, including 3,500 FDI jobs and diverse employment sectors including Pharma, Life sciences and Food.

Between 2016 and 2031 it envisages a population increase for County Tipperary of 20,500 – 24,500 persons, of which 11,000 – 13,500 would be in the south riding. The RSES specifically recognises the Strategic Employment Land Bank at Ballingarrane Park, and identifies a key requirement for an economic funding package to support its further development.

In terms of Clonmel Regional Policy Objective - RPO 17 states:

*a. To support Clonmel as a self-sustaining regional economic driver and as a key location for investment and choice in the region, to support the enhanced development of Clonmel based on its strategic location relative to Limerick-Shannon, Cork and Waterford MASP areas, as well as its role as a centre of employment and economic activity within the region;*

The Key Infrastructural Requirements identify transport measures, through a Local Transport Plan, to including continued investment enhancing sustainable transport modes, particularly walking and cycling in the town.

## 2.3 Tipperary County Development Plan 2022 – 2028 (CDP)

The CDP notes Clonmel is amongst the three designated 'Key Towns' in the County which are identified as large population scale urban centres, functioning as self-sustaining regional drivers. Each Key Town is targeted for over 30% growth by 2031 with a focus on compact growth and appropriate density. The Core Strategy Table (Table 2.4) targets Clonmel for 21% of the County's population growth share, with 3,428 additional population by 2028 and 5,142 by 2031.

Table 2.4: Core Strategy Table											
Typology	Settlement	Population 2016	Population increase to 2031 <sup>10</sup>	Population projection 2028	Additional persons to 2028	% population growth share	Housing Requirement to 2028	Existing Residential Zoning (ha)	Total currently available land (ha) <sup>11</sup>	Estimated (Ha) 2028 residential land zoning <sup>12</sup>	Estimated (Ha) 2031 zoning Framework <sup>13</sup>
<b>Urban Growth 66%</b>											
Key Town and Self-Sustaining Regional Driver	Clonmel	17140	22282	20568	3428	21.0	1270	124	136	63.5 - 51.8	96 – 76.5

The CDP cites the RSES in terms of the principle of capacity building and place-making for economic development being a key element of economic growth. And states it will collaboratively support strategic employment opportunities:

*‘to support foreign direct investment and attract investors across the county. Key examples are the Ballingarrane Business, Science and Technology Campus, in Clonmel, and the Stereame Business Park, Limerick Road, Nenagh’.*

The NPF, used a ratio of 1.6 between the population growth targets and employment growth. Applying this ratio the jobs targets for Clonmel commensurate with the CDP population growth targets would be an additional 3,214 jobs by 2031. This equates to a 50% increase in the 2016 employment figures and an almost doubling of the existing FDI employment in the town.

In order to deliver upon these ambitious targets, it is imperative that sufficient and appropriate employment zoned lands remain available in the short-term. Chapter 8 of the CDP acknowledges the need to continuously monitor this provision and work in partnership with bodies such as IDA Ireland to identify new landbanks as required.

*‘The Council will continue to work in partnership with, and to seek, identify, masterplan and promote the development of business parks for economic development, building on the strengths and specialties of each town and their adjoining areas as set out in Chapter 4, Section 4.3 and 4.4 as opportunities arise, and through the LAP process.’*

# Key Planning Considerations

## 3.1 Realising Growth Targets

██████████ welcomes the Council's approach to planning for economic growth in the Draft LAP, which identifies Clonmel as one of the key strategic population and employment growth locations in the county. They support the Draft LAP policy which undertakes to continue to ensure that sufficient provision is made in terms of zoning to deliver upon these ambitious targets. Arising from this they acknowledge the Council's commitment to continue to work with national economic stakeholders, such as ██████████, to identify strategic employment locations, to provide opportunities for investment in new businesses and to support emerging sectors of the economy, as required.

As noted in Section 2, Clonmel, as a Key Town, has been allocated a population growth target of 30%, equating to 5,142 additional persons by 2031, from a 2016 base of 17,140. Using the NPF population to jobs ratio of 1.6 this equates to a requirement for an additional 3,214 jobs by 2031. This represents a 50% increase in the 2016 employment figures or an almost doubling of the existing FDI employment in the town.

In this context ██████████ strongly supports the Council's designation of the Ballingarrane Masterplan Area as Strategic Employment Site in the Draft LAP (ref figure 02).

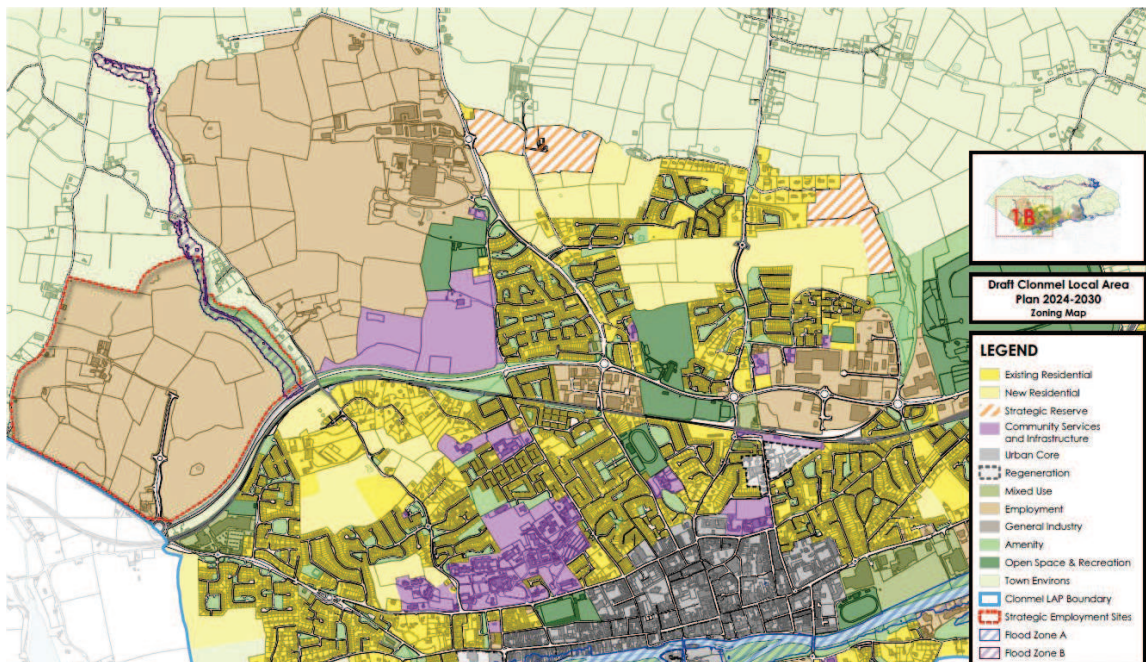


Figure 02: Draft LAP Zoning Map

However, in the context of these ambitious growth targets for this Key Town ██████████ query the statement in the SLA which notes that:

*'No additional areas have been identified for employment use in Clonmel, however the zoning of Site 6 has been rezoned from 'Commercial' to 'Employment'.*

Furthermore, while no additional areas have been zoned for employment, Section 3.1 of the SLA indicates that of the 545 hectares zoned in the 2013 LAP for Commercial, Industrial and Employment use, there remains 303 hectares still available to accommodate the employment growth target. The table on page 12 of the SLA (ref Figure 03) assesses these 303 hectares of zoned lands against a number of criteria. It is noted that with the exception of the Ard Gaoithe Business Park and the Ballingarrane Masterplan Area (site ref 1 and 2) which account for 237 hectares of the residual 303 hectares of zoned lands, the remaining lands are either Tier 2 lands or of too small a scale to support the majority of [REDACTED] client developments.

*Table 2: SLA for lands available for employment use*

Site reference		Availability of Infrastructure at the site						Assessment including Consideration of Sustainable Planning Criteria	Category Score
Site Reference	Area (Ha)	Roads	Footpath	Water	Cycle Lane	Public Lighting	Foul Sewer	Comment	Tier 1 or Tier 2
1	104.93	✓	✓	✓	✗	✓	✓	105ha of available land within the Ballingarrane masterplan area. The overall campus comprises 121 ha, of which 96.1ha is owned by Tipperary County Council and 21ha by IDA Ireland. The land is well serviced with direct access off the N24. The strategic importance of the landbank is recognised in the Southern RSES.	Tier 1
2	132.01	✓	✓	✓	✗	✓	✓	The lands are well serviced and strategically located, adjoining the Abbot Vascular and Boston Scientific Campuses and the Ard Gaoithe Business Park to the north west, and the N24 to the south.	Tier 1
3	0.90	✓	✓	✓	✗	✓	✓	Well serviced site located adjacent to the Fethard Road Roundabout and the railway station.	Tier 1
4	4.19	✓	✓	✓	✗	✓	✓	Well serviced site located adjacent to the Powerstown Centre.	Tier 1
5	5.04	✓	✓	✓	✓	✓	✓	Edge of town centre backland site located to the rear of commercial businesses fronting Davis Road. Well serviced site with access to Davis Road and River Suir blueway.	Tier 1
6	5.27	✓	✓	✓	✓	✓	✓	Well serviced site with access to Davis Road and River Suir Blueway.	Tier 1
7	3.82	✓	✗	✓	✗	✗	✓	Located in existing light industrial area. Well serviced with access off the N24.	Tier 1
8	4.50	✓	✗	✓	✗	✗	✓	Located in existing light industrial area. Well serviced with access off the N24.	Tier 1
9	1.22	✓	✓	✓	✗	✓	✓	Located in existing light industrial area. Well serviced with access off the N24.	Tier 1
10	17.87	✓	✓	✓	✗	✓	✓	Located adjacent to the existing Bulmers production plant.	Tier 2
11	22.35	✓	✗	✓	✗	✗	✗	Located adjacent to the existing MDF production plant, a heavy industrial use.	Tier 2

**Note:** No additional areas have been identified for employment use in Clonmel, however the zoning of Site 6 has been rezoned from 'Commercial' to 'Employment'.

**Figure 03: Table 2 from Page 12 of the SLA**

The Draft LAP also notes that in May 2023 Boston Scientific announced expansion plans in Ard Gaoithe Business Park and in Ballingarrane Masterplan Area there is a Part 8 application underway for the construction of 10no. modular multi-purpose buildings. The realization of these proposals will further reduce the residual available employment zoned lands.

Based on the above [REDACTED] strongly supports the Strategic Employment Site designation at the Ballingarrane Masterplan Area in the Draft LAP as an essential landbank to accommodate projected employment growth. In line with Section 8.3.2 of the CDP, [REDACTED] would also like to commit to working in partnership with the Council on capacity building in Clonmel and its Environs, in an on-going basis, to identify further suitable lands required to accommodate large-scale FDI development as and when the need arises.

### 3.1.1 Clarification of Employment Zoning Area Figures

[REDACTED] would like to request clarification from the Council in relation to the employment zoned land figures as those cited in the table on page 4 and Section 3.2 of the SLA includes zoning for 361 hectares of employment lands and 132 hectares of general industrial zoned lands, combining to form a total of 493 hectares of total employment zoned lands. This appears to contradict the total available employment zoned lands figure set out in the tables in Section 3.1 and on page 12 of the SLA, which combines to 303 hectares.

## 3.2 Access and Services

In view of this strategic significance of the Ballingarrane Masterplan Area, [REDACTED] would like to emphasize the importance of ensuring that it evolves over time into a sustainable employment location.

### 3.2.1 Public Transport Access

To this end they ask the Council to prioritise and enhance upon the implementation of the Town Bus service as proposed in Appendix 2 – Local Transport Plan (LTP) of the Draft LAP. The LTP notes that currently 4 no. bus routes serve Clonmel Town:

- Route 55 – Limerick to Waterford (hourly during weekdays),
- Route 355 – Cahir to Waterford (c. 2 hourly during weekdays),
- Route 245 – Clonmel to Cork (c. 3 hourly during weekdays),
- Route 356 - A new Rural Bus Service between Clonmel and Dungarvan.

The most proximal existing bus stop to the Ballingarrane Masterplan Area is at South Tipperary General Hospital, c. 28 minutes' walk from the subject site. A Town Bus service that operated prior to Covid has since ceased. The LTP identifies 3 no. potential new routes for a re-introduced Town Bus Service.

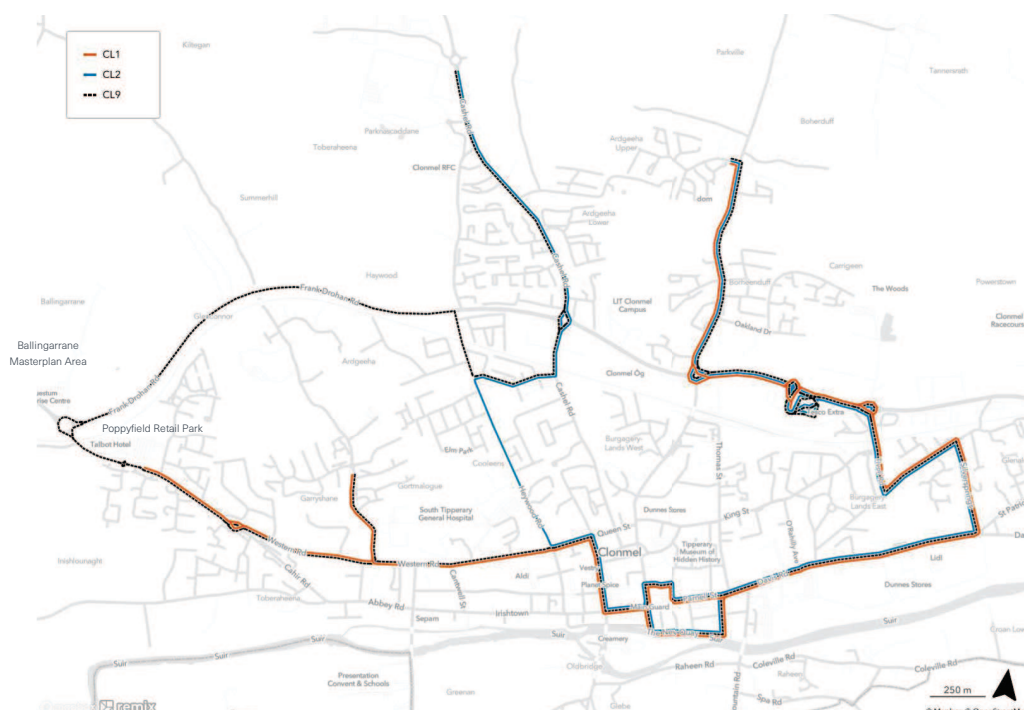


Figure 04: Extracted from Figure 6-19 of the LTP

These include:

- CL1 – this route travels from the east to the west of the town via the town centre as far as Poppyfield Retail Park where it reaches its terminus. The terminus is within walking distance the Ballingarrane Masterplan Area. The route is planned to operate every 60 minutes.
- CL2 – this route similarly travels from the east to the town centre before heading north onto Cashel Road where it crosses the N24 and continues along Cashel Road to its terminus at Ard Gaoithe Business Park. The route is planned to operate every 60 minutes.

- CL9 – this route follows the route of CL1 but extends beyond Poppyfield Retail Park to the N24 where it passes and serves the Ballingarrane Masterplan Area before continuing east to the Cashel Road to its terminus at Ard Gaoithe Business Park. The route is planned to operate two return journeys per day.

██████████ fully supports the delivery of all three routes to provide public transport access to existing employment sites around the town of Clonmel and enhanced linkage with residential areas. However, with the view to promoting the future sustainable development of the Ballingarrane Masterplan Area, which is currently constrained by an absence of adequate public transport provision, they would like to emphasize to the Council the importance of the implementation of routes CL9 and CL1 in particular. Furthermore, they request the Council revisit the proposed frequency of the CL9 route of 2 return routes a day which would not appear to be of sufficient frequency to support the development of this Strategic Employment Site. Our client therefore requests that the Council increases this proposed frequency.

The LTP notes that the locations of bus stops have not yet been finalised. Again, ██████████ would like to re-iterate the importance of providing a bus stop in close proximity to the masterplan lands.

### 3.2.2 Cycling Connectivity

As Figure 05 indicates the masterplan lands already benefit from proximity to an existing segregated cycle lane along the N24 to the Cashel Road Industrial Estate.

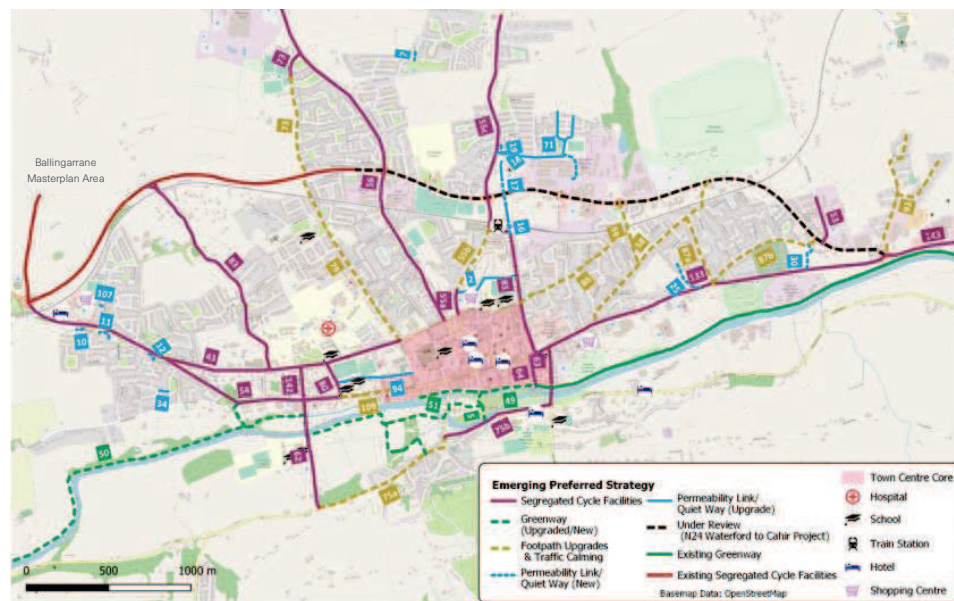


Figure 05: LTP – Key Active Travel Measures

The LTP includes a number key active travel interventions contained in the Emerging Preferred Strategy which are outlined in Figure 05. ██████████ welcomes the proposals to extend the existing cycle lane into the town centre and to adjoining employment and residential zoned lands along the Cashel Road (AT 56) and the proposed enhanced cycle connectivity from the site along the Cahir Road (AT 43 and AT 54) and Glenconner Road (AT 83). In combination, the delivery of these objectives will contribute to the realization of a sustainable modal shift by future employees of this future strategic employment hub and support the achievement of local Climate Change reduction targets.

## Conclusion and Request

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██████████ commends the Council on their structured and evidence-based approach to the preparation of the Draft LAP. They concur with the Council with regard to the strategic importance of Clonmel, a key Town, as an economic driver in the Mid-west Region. An ambitious population growth target of 30% has been established for the town. The CDP Core Strategy Table (Table 2.4) identifies that Clonmel is set to accommodate 21% of the total County's population growth target, equating to 3,428 additional persons by 2028 and 5,142 by 2031.

Using the NPF population to jobs ratio calculation this generates a requirement for an additional 3,214 jobs by 2031, representing a 50% increase in the 2016 employment figures or an almost doubling of the existing FDI employment in the town.

While a generous quantum of employment zoned lands was included in the 2013 LAP to support Clonmel's strategic growth, in the intervening years this quantum has been reduced from c. 545 hectares to the c. 303 hectares of land that the SLA estimates remains available. Of these remaining available zoned lands many would not be suitable for FDI scale developments and several remain Tier 2 site.

In this context ██████████ consider that most future FDI client development will be focused on the Ard Gaoithe Business Park and the Ballingarrane Masterplan Area (site ref 1 and 2) which account for 237 hectares of the residual 303 hectares of zoned lands.

Based on the above they strongly support the zoning of the Ballingarrane Masterplan Area as a Strategic Employment Site, requisite to deliver the targeted growth of the town. To underpin future sustainable development of the site they ask the Council to ensure that a number of active travel initiatives in relation to the connectivity of the site be prioritized and amended to support the site's development.

██████████ therefore requests that:

- the introduction of the proposed Town Bus route CL9 and CL1 be prioritized, the proposed frequency of the CL9 service be reviewed, and any detail design proposal ensure that bus stop provision is made for the Ballingarrane Masterplan Area along the CL9 route.
- The proposed cycle path upgrades as proposed along Cashel Road (AT 56), Cahir Road (AT 43 and AT 54) and Glenconner Road (AT 83) be prioritised to support the modal shift to sustainable travel of the future employees within the masterplan area.

Furthermore, ██████████ undertake to work in partnership with the Council's in the fulfillment of their commitment to continue to identify strategic employment locations as required to support the on-going economic development of County Tipperary and the Mid-west Region.





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Accreditations  
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