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8th September 2023

Tipperary County Council
Emmet Street
Clonmel

Reference: My comments on some points within the Draft Clonmel Local Area Plan 2024-2030
[Draft Clonmel Local Area Plan 2024-2030 | Tipperary County Council Consultations \(tipperarycoco.ie\)](https://www.tipperarycoco.ie)

Dear Madam/Sir

Please see my comments below on some points within the above report. I have referenced everything by policy or objective number.

Policy 1.1 I notice that you intend giving primacy to the Tipperary County Development Plan 2022-2028 if a conflict arises between it and the Clonmel plan, however please keep in mind that the TCDP itself may need to be reviewed and updated. So much has happened, so quickly, over the past few years, with Covid and massive ongoing climate problems that all reports and decisions are likely to be somewhat outdated and must be reviewed.

Policy 2.1 I firmly support the concept of retrofitting on brownfield sites, as it is by far the most environmentally friendly option. However, I strongly recommend great caution if there is any resistance or pressure from builders/others not to do so. To them, cost and ease are always the priorities and they will apply pressure to suit their needs. This is often not the right thing to do, thus, I urge the Council to stand firm on the retrofitting concept. I am also in favour of development on brownfield sites, rather than greenfield. I believe we must refrain from developing green spaces wherever possible

Policy 2.3 I firmly support low-carbon/energy efficiency within new developments; however, I also urge a greater inclusion of nature/biodiversity specifically with native plants and not just pretty stuff from the nearest garden centre. I request that this apply to all types of development. Real planting of native species and not just pots/planters and boxes. I would also like to see areas of grass being required and not allow to be paved over. There has been a tendency to pave back gardens; this upsets the balance for carbon sequestration, feeding opportunities for insects/birds and rainwater soakage.

Policy 2.5 I strongly recommend that considerably greater care is taken with regard to the visual aspects and character of developments within existing areas. I have seen many additions where are extraordinarily ugly, with absolutely no curb appeal, disrupting the character/style of the neighbourhood.

Objective 2C/DI strongly recommend considerably greater care with regard to the location of new developments. Like many others, I was particularly disappointed to see a wonderful space on Queen Street being given to [REDACTED] Supermarket, in an area which would have been perfect for 3-4 storey apartments for older residents. Such homes would have been within walking distance of town. We already had sufficient

supermarkets (two plus a grocery shop within 100 meters). [REDACTED]. The [REDACTED] decision conflicts directly with your Objectives 2C and 2G. I am therefore very concerned regarding the usefulness/accuracy of any Draft Plans.

- Objective 2G** Further to my comment above, a town centre location such as Market Square is perfect for conversion into attractive, comfortable homes for older people and people generally. I believe it is critically important to use this space for homes and not commercial use. While there are some shops in the location (a book shop, hair-dresser and restaurant), I recommend that heavy restrictions are placed on further commercial development. Most importantly, the area must be tastefully designed with charm and character. This will contribute substantially to the overall feel and appeal of the town centre. This has the potential to be a prize-winning space and could be a real coup for the Council.
- Policy 3.1** I strongly support the re-use of vacant and underused sites within the urban core, with the very strong proviso that care is given to the character of the area.
- Policy 3.5** Regarding town centre regeneration, where vandalism occurs (eg Shelmadens Lane), repairs must be carried out immediately and continually as necessary. The vandals are in the minority, but the townspeople suffer on a daily basis, as they walk by and have to see the mess. The psychological concept of the “broken window” encourages further vandalism and is very bad for overall morale. I continue to hear great disappointment from so many people regarding the condition of the town centre and [REDACTED]. [REDACTED]
- Policy 3.6** I strongly support this recommendation. The architecture in Clonmel is stunningly beautiful, but if we don’t look after it, we will lose it forever.
- Policy 3.9** I agree fully that traditional shopfronts must be retained or refurbished in accordance with the architectural heritage, so I find it very confusing to see that the owner of a new coffee shop in Parnell Street has been allowed to destroy the original window and replace it with an extremely ugly metal door and new window, neither of which is remotely in keeping with the style of the area. This should not have been allowed. Other properties on this street use the original door, enter the hallway and then use a second, internal door into the premises, with a separate door from the hall going upstairs. When I see situations like this, my faith in the current document crumbles and I wonder if I am wasting my time. If we don’t look after such traditional buildings, we will lose them forever. I recommend that this café be required to revert to the original set-up and the cost be borne by the Council.
- Objective 3D** I strongly, strongly recommend that great care be taken when trying to “overcome planning obstacles”. This could be in direct conflict with Policy 3.9 above. I am the first person in line to support the concept of upper floors being turned back into homes (as they should be and are in every other country); I would be delighted to see this, however, please do not allow “the baby to be thrown out with the bathwater”. In the rush to convert upper floors, please do not allow this to be used as an excuse for someone to remove character from a property and to not re-use existing materials. Short-cuts are often taken by builders/developers and the concept of “do what I want and ask for forgiveness later” should not be tolerated.
- Objective 3F** For the proposed bridge, I strongly recommend that immense care be taken regarding the beauty of such a structure. While there is an obvious function for this bridge, the elegance, style and character are of equal importance. Showing care and consideration for the overall look of the bridge can be a charming addition to Clonmel or can be just another bland/generic structure.
- Objective 3H/3II** I strongly support the concept of painting and art to improve streetscapes. There are some lovely murals around and I have heard great praise. I encourage a lot more of this. However, per Policy 3.5 above Shelmadens Lane desperately needs some help. In situations of vandalism, the Council needs to

carry out repairs immediately; this is a message to society as a whole and will help ease the negative feelings and comments towards the Council.

- Objective 3J** I strongly recommend as high a degree as possible be given to biodiversity education within the garden, with native plantings as much as possible.
- Objective 3M** The Delahunty Square Public Realm project - I believe this refers to the building of a new library, I have heard much criticism of this and I strongly object. This would be a huge misuse of public funds. (Unfortunately, I was not resident in Clonmel when this proposal was originally presented). I have heard recommendations that the library might be relocated to the Kickham Barracks and this makes great sense. In addition, the existing library building could be reused for something else – for example, nice apartments. This would be a far more environmentally friendly thing to do, which is supposed to be our #1 focus. Plus, it would be financially a lot less expensive.
- Policy 4.3** “Sustainable development” is often a misnomer, it usually means massive destruction and I despair when I hear this phrase. I strongly recommend a review of the land use at Ballingarrane with significantly more land being kept for nature and parkland. We do not need all this additional industry and pollution in Clonmel, nor do we need more jobs; the jobs ratio is already very high. Our focus should not be on economic growth, because it is certainly not sustainable, no matter how often that word is used. Full focus should and must be given to the environment, which will immediately impact health of local people (saving millions). Your proposed development will only attract traffic and carbon to the area. Driving/road use to areas such as Cahir and Waterford will increase. Nowhere in this “development” is there a benefit to the people of Clonmel.
- Policy 4.4** I urge caution with tourism development, it can very quickly descend into over-tourism which is being noted in many other countries. Hedgerows being ripped up to create pathways for visitors is not beneficial at all. The local people must come first; their lives and living conditions are of far higher importance.
- Policy 4.5** I agree it would be wonderful to see the [REDACTED] being tastefully renovated, in keeping with the character of the building and the town. For the most part, a good job was done at [REDACTED] and something close to this calibre would be greatly welcomed. [REDACTED], so a good solution would help the town on many levels, bringing vibrancy – as long as it does not conflict with the environment. Again, the re-using of existing materials must be a priority.
- Objective 4C** As stated above, I strongly recommend an immediate review of the Ballingarrane plan – I would hate to see this area destroyed and it will not be of benefit to the townspeople. Employment does not need to be strengthened, the focus needs to be on attitudes, activities and plans for the environment/nature. This is the area which needs strengthening and support. Proposed industry may benefit some people who don’t even live in this country, but it will not benefit the people of Clonmel – let’s be very clear on that.
- Objective 4G** Events, festivals, more street music etc – excellent. It would be perfect to close O’Connell Street from [REDACTED] up to the corner of Mary Street. I believe this should be done every Saturday anyway – I have heard this several times and it would create such vibrancy and help footfall enormously. Also, the Saturday fruit and vegetable market should be moved to O’Connell Street instead of its current awkward location.
- Objective 4H** Night-time economy – yes, it would be great to have more life at night, however, the streets must feel safe enough for women to walk around town. [REDACTED]
[REDACTED]
[REDACTED] I would support improvements in this area.

- Objective 4J** The West Gate is a wonderfully historic and important location; I urge caution with spending public money on putting a museum here. Footfall in the current museum is not very high. I believe the matter should be carefully and openly discussed before large sums of public money are spent.
- Policy 5.4** I plead for the consideration of beauty, character and curb appeal for all new developments and retrofits.
- Objective 5B** I strongly support opportunities for allotments, community gardens, with a note of caution regarding the concept of food foraging.
- 6.3.1** I strongly support improvements to pedestrian and cycle routes and I highly recommend the immediate reduction of building new roads, as this will only attract more cars (carbon) and we must get people out of cars. The current thinking is very gentle/relaxed and many people are not getting the message. However, in the coming years, the matter will be dramatically more important, as our environment disintegrates.
- 6.4** Road Link 1 – this should only be for pedestrians and cyclists. Absolutely not for motorists. Per above, the point we are all trying to make is that we must get motorists off the road; get them walking, cycling or using public transport instead. I also recommend the protection of green space, so please reduce road building.
- Policy 6.1** I strongly support this policy, we must reduce dependency on private cars.
- Objective 6B** I strongly agree that train services be improved, I have heard support for this from many people.
- Policy 7.1** The biodiversity of the River Suir must be protected, enhanced and given top priority.
- Policy 7.2** The retention of mature trees is vitally important plus more greening of urban areas. Lush, mature trees can be seen and enjoyed in every other country throughout Europe. Many people are not aware that mature trees are far more valuable than new/young trees, especially when those young trees are placed in boxes. Such containers are extraordinarily expensive and are really only ornamental. Apart from the beauty and character of trees, they provide so much in terms of carbon and dust capture, soaking up excess rain water, noise reduction, shade and shelter. I strongly object to the removal of mature trees in the town centre and as a member of a local environmental group (Suircan), we have been objecting for several years and we have the support of many Clonmel people. It is very clear to us that the Council simply does not understand the benefit of mature trees, because removing them is not of benefit to the public at all. My concern relates to the fact that we will have dramatically hotter summers in the next few years and dramatically wetter winters. Of particular importance, the trees provide shade, shelter and drainage. [REDACTED]
[REDACTED] Concrete spaces attract and hold heat. During the very hot weather last week, I carried out a temperature test on three streets and under several trees. The test was relatively short with only 5 minutes on each side of each tree. Nevertheless, I was able to identify a 10 centigrade degree difference between the sunny side and the shady side of the trees. If I had stayed longer, the difference would have been greater. In addition, the amount of rainwater soaked up by these mature trees is enormous. Young trees will not cope with heavy rainfall and I also know that the proposed Town Centre plans to remove the mature trees and plant some new young trees, will not meet SUDs requirements. This is massively important and I don't want to see the Council making an enormous mistake. We have consistently requested an independent review; [REDACTED]
[REDACTED]
- Policy 7.4** Views and streetscapes are vitally important, often ignored or not valued by building contractors and developers. The long-term benefits to the townspeople must be priority above any short-term gains.

Objective 7C I agree that walking along Blueways is wonderful and I am generally very supportive of this, however I urge great caution in terms of ripping out hedgerows or trees and suggest that the pathways be designed to wander and curve as much as possible in order to minimise removal of this priceless linear woodland. That is what a hedgerow is – a vital, vibrant corridor for wildlife, much of which is endangered.

Objective 7D Exactly as above, having a river walk is a lovely idea, however if there is situation where a curve is not available and some hedgerows have to be removed, the Council must plant double that amount elsewhere and it must be documented and publicly released. I have heard too many accounts where landowners etc remove far more than the allowed and we are losing this priceless resource.

Objective 7F A tree strategy is desperately needed and long overdue

Objective 8A Many thousands of people in the Clonmel area have suffered on numerous occasions over the past few months due to lack of water from [REDACTED]. No notice is given and this is especially hard for young families. It's appalling in this day and age to wake up and find there is no water at all. I know there are several reasons why things have not worked out well, however, the Council needs to address this problem, urgently.

I realise you will probably get very little feedback for the plan, however almost all of what I have written above represents views from many people. [REDACTED]
[REDACTED]. Clonmel is a beautiful town and deserves proper care and attention from the Council. I want to see a beautiful, green and vibrant town with a clean river running through it.

Yours sincerely

Myriam Madigan
[REDACTED]