

[REDACTED],
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11/ September/2023

To whom it may concern,

We the undersigned residents of Moangarriff welcome the news that Tipperary County Council has issued a new Local Area Plan (LAP), which will replace the existing 2013 Clonmel & Environs Development Plan. We would like to make a submission in relation to our own local area of Moangarriff (Figure 1)

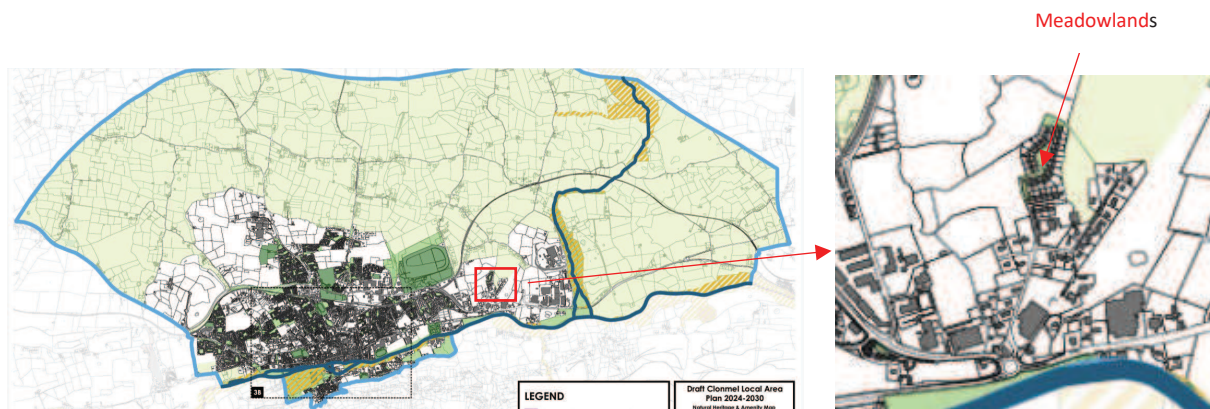


Figure 1: LAP Boundary with Moangarriff area shown

It is welcome that Monagariff, although **2.6Km** from town centre of Clonmel, is included in the Local Area Plan.

Of the 6 distinct locations in the town, the Moangarriff area is considered as Area no 5 (see extract below from page 51 of the written statement. It is positive to see the disincentive to walking and cycling acknowledged & support of developing future walking and cycling options from this area to the town centre (Figure 2)

5. East of the N24 Bypass on the east side of the town

The alignment of the N24 bypass on the east side of the town, sweeping southeast to meet Davis Road at the Moangarriff Roundabout has created a distinct neighbourhood to the northeast, which includes the Meadowlands Estate and sections of linear housing east of Clonmel Racecourse. This has created car-dependency in terms of getting to and from town centre, and the larger service and employment locations in the town. In terms of active travel, the Moangarriff Roundabout on the N24 bypass forms a disincentive to walking and cycling.

The LAP supports the Local Transport Plan in putting in place walking and cycling options from this area to the town centre.

Figure 2: Extract from LAP Draft

In Appendix 1, ‘‘Serviced Land Assessment’’, two sites, numbers **26** and **27** are listed in this area (Figure 3) adjacent to the Meadowlands estate.



Figure 3: Sites 26 & 27

Table 1 from Appendix 1 indicates site 26 has a category score of ‘‘Part SR’’ while 27 has a category score of ‘‘SR’’, see figure 4. The table indicates that **site 26** has 6 ‘x’ and **site 27** has 7 ‘x’ out of the desired 11 categories, ‘x’ meaning requirement is not met. None of the desired ‘sustainable planning criteria’ are met for the sites. SR means ‘‘Long term strategic and sustainable development site – that may deliver housing in the subsequent development plan period, >6 years’’ as opposed to Tier 1 & 2 new residential sites which are currently serviced or serviceable within the lifetime of the plan.

Table 1: SLA for Lands available for new residential development

Site Details		Availability of Infrastructure at the site						Sustainable Planning Criteria applicable to the site					Category Score
Site Reference	Area (ha)	Roads	Footpath	Water	Cycle Lane	Public Lighting	Foul Sewer	Compact Growth	Walking analysis 5 - 10 mins	Walking Analysis 10 - 15 mins	Cycling Analysis 10 mins	Sequential	T1 / T2 / SR / Rezone
26	8.28	✓	✓	✓	x	✓	✓	x	x	x	x	x	Part SR
27	18.40	✓	x	✓	x	✓	✓	x	x	x	x	x	SR

Figure 4: Extract from Table 1, Appendix 1

In November 2022, Tipperary County Council granted conditional permission for Application register number [REDACTED] - Construction of 68 residential units comprising 14 two-bed houses, 36 three-bed houses, 10 four-bed houses, 4 one-bed apartments, 4 two-bed apartments, partial demolition of the boundary wall to the Meadowlands estate together with site/ancillary works at Moangarriff, Clonmel, Co. Tipperary. The site in question from our understanding is site **26** referred to above. This decision is currently under appeal by Moangarriff Residents (and others) with Bord Pleanala and decision is pending. The assessment in the draft LAP backs up our conclusion that the sites 26 adjacent to the Meadowlands estate is not suitable now as a residential site due to many deficiencies.

While a ‘√’ is indicated for roads and footpath in the extract from table 1 above (figure 4), our belief is that these should be an ‘x’. The access road (Moangarriff Road) to residences at Moangarriff is not suitable to support additional traffic serving any future development in the land, east of Gurtnafleur and west of the existing Meadowlands estate. This fact was acknowledged in the 2008 Clonmel & Environs Development Plan; See extract below with the supporting sentence 3.2.11 underlined. There is also lack of continuous footpath on the Moangarriff road.

CLONMEL AND ENVIRONS DEV PLAN 2008 P.27

Clonmel Borough Council South Tipperary County Council Chapter 3: Housing and Community Services Clonmel and Environs Development Plan 2008 27 Housing Proposal R.26: Lands at Moangarriff Lands comprising approximately 12.5 hectares (gross) at Moangarriff, east of Gurtnafleur and west of the existing Meadowlands Estate, are allocated for residential development. The area comprises two parcels of land considered suitable for medium-density residential. In order to ensure an integrated scheme with optimum provision of infrastructure, the two parcels will be considered as a single development and a comprehensive Masterplan will be required to be prepared in accordance with Policy H.4. 3.2.9 The sites are located within the town boundary, approximately 2.5km east of the town centre, with existing medium-density housing to the east, low-density housing to the south, and the industrial uses of Clonmel Healthcare/Kentz to the south-west. Ribbon development extends around most of the peripheral roads, characterised by low-density mostly individual bungalow-style houses. 3.2.10 Given the relationship of the eastern parcel of land to the existing Meadowlands estate, and the presently disturbed nature of the site, it is considered that medium-density housing development would be appropriate subject to other conditions of this Plan. Similarly, medium-density development would be appropriate for the western parcel of land, which is well-related to Gurtnafleur Road. 3.2.11 Vehicular access will be required to be obtained from Gurtnafleur Road for both parcels of land, given the limited capacity of existing access roads to the east. A comprehensive Masterplan for the combined lands, showing the access arrangements and connections with adjoining lands, including pedestrian and cycle linkages, will be an essential component of any application.

This conclusion, although omitted from the subsequent 2013 plan, has been further backed up by other reports:

- Planning application file [REDACTED] contains a planner's report dated April 2000 which deems Moangarriff Road inadequate for purposes of accessing the 105 houses proposed by this application. The report indicates that the ‘*development on the land would be premature by reference to the existing deficiencies in the road network*’.
- The De Jong report related to the East Clonmel LAP 2004 which was subsequently replaced by CEDP 2008. The following are some quotations from the De Jong, extracted from working papers relating to the 2004 plan.

“A local cul-de-sac road enters the site from the Moangarriff roundabout on the N24. This local road services frontage housing development and some lands which have received permission for housing developments. The layout of the recent housing development (road geometry and frontage development on the road system) militates against the use of road as a spine road for in-depth development of the site.”

The local road off Moangarriff roundabout has certain constrictions if required to serve in-depth development. Width varies generally from circ. 5.3 m carriageway to circa 6.3 carriageway. Lack of footpath continuity on the existing road and junction visibility difficulties to be overcome.”

It is noted that since the above judgements were made with respect to the lack of suitability of the Moangarriff Road, additional businesses have been added on to the road – in particular, the busy Applegreen Garage and shop which has expanded to include a Deli/Restaurant at the Moangarriff Roundabout and the business park across from the garage (Pulse Logistics Warehousing which involves trucks/lorries and Southern Gas). These additions have rendered the ‘deficiencies in the road network’ and ‘limited capacity of existing access roads to the east’ more serious than previously.

Road safety is already compromised on Moangarriff Road and that using this to access any major developments would further compromise safety by means of increased traffic. The exit from Applegreen, just off the roundabout, is a major safety concern and has been the location of numerous accidents. Cars exit this garage in front of cars coming off the roundabout because the exit is too close to the roundabout – it is common for residents to stop because of cars exiting. There is no continuous footpath, cycle path, pedestrian crossing along the road and there is also equine traffic that needs consideration (from equestrian centre at top of Moangarriff Road). We would like the conclusion from the 2008 Clonmel & Environs Development Plan with respect to the limited capacity of Moangarriff Road to be reinstated into the new plan along with the requirement that any future developments east of Gurtnafleur and west of the Meadowlands estate would be accessed via the Gurtnafleur Road. Otherwise, can someone from Tipperary Co. Co. explain to us what changes has made that road suitable now versus what was stated in the 2008 plan. It does appear that access to that parcel of land (26&27) via the Gurtnafleur road is maybe possible – marked with ★ in the map above (figure 3).

It is noted on review of the [REDACTED] to the original draft LAP from earlier this year, that there is a significant excess of zoned development land relative to the needs. The current Appendix 1 indicates 96.04ha Tier 1 & 2 (new residential sites which are currently serviced or serviceable within the lifetime of the plan) versus a need of 51.8-63.5 indicating that is a factor of at least 1.5 times more than needed.

In referring to the Core Strategy contained in Chapter 2 of the Tipperary County Development Plan 2022-2028, the OPR notes that there is currently 136ha of available land zoned for residential development in Clonmel and the Core Strategy sets out an estimated requirement of between 51.8 and 63.5ha of residential zoned land.

Figure 5: [REDACTED] Submission to original plan

Based on the above, we request that site 26 and 27 be de-zoned from residential until such time as the many inadequacies, including those highlighted in the draft plan, have been assessed. We also request as above the conclusions of the 2008 plan in relation to development in these lands be reinstated.

Joe Ryan (On behalf of undersigned residents)

[REDACTED]
[REDACTED]
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SIGNATURES

	Name	Address
1	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]
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4	[REDACTED]	[REDACTED]
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7	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]
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