

08 September 2023

BY-EMAIL

Tipperary County Council
Civic Offices,
Clonmel,
Civic Offices,
Nenagh,
Co. Tipperary

Our Ref: 501.00785.00001

Your Ref: Draft Clonmel Local Area Plan 2024-2030

Dear Sir / Madam,

RE: SUBMISSION ON THE DRAFT CLONMEL LOCAL AREA PLAN 2024-2030

SLR Consulting Ireland, has prepared this submission on behalf of [REDACTED], [REDACTED], Ireland's largest producer of certified wood; a natural, renewable and sustainable resource. The [REDACTED] manufacturing plant features the latest production technology to deliver high quality MDF (Medium Density Fibreboard) panels which meet the diverse needs of domestic and international users, from furniture to kitchens, across 20 countries.

The Site at Redmondstown

The [REDACTED] facility at [REDACTED] has an area of 62 hectares and employs 160 full time staff and the main processes operate 24 hours per day, 7 days per week. [REDACTED] directly at the Clonmel facility, supporting further employment through the supply chain across the South East region. It has been operating for almost [REDACTED] and is a significant employer providing job to Clonmel and the wider sub region.

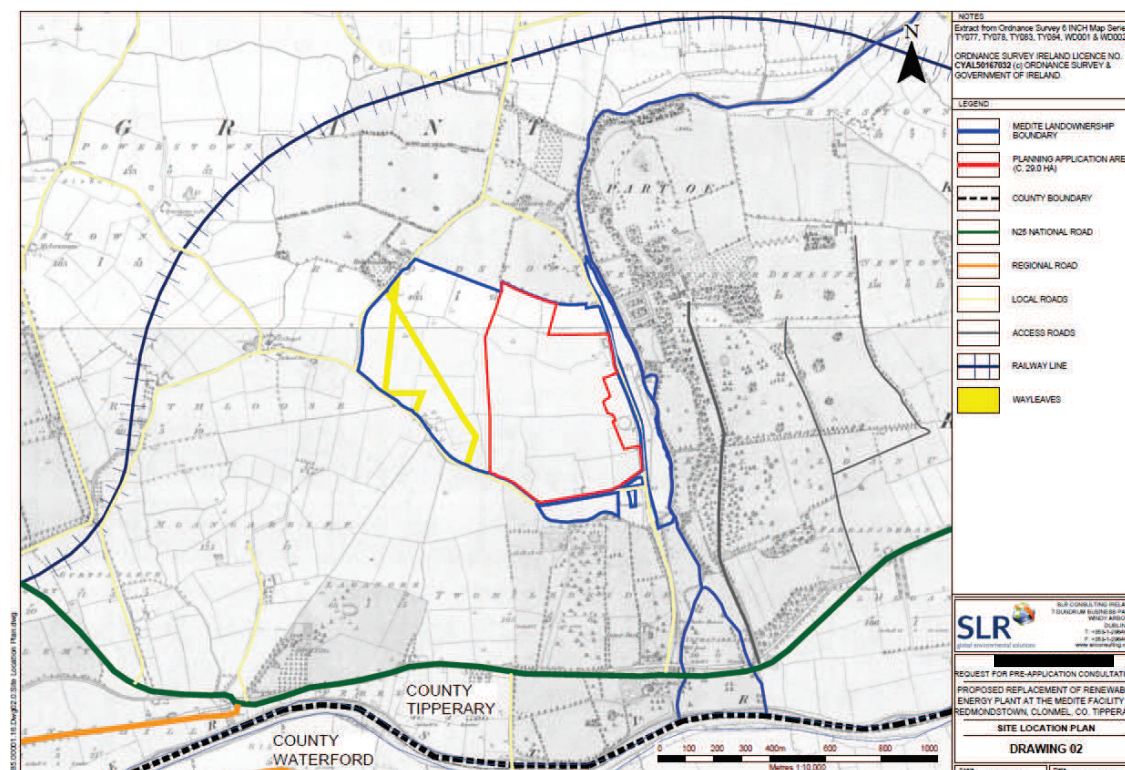
The facility is located north of the River Suir and is accessed via the L2506, a local access road off the N24. The existing buildings in the [REDACTED] facility use a significant proportion of the total site area and are situated approximately 50m back from this local access road.

The site is composed of the main production plant buildings and materials storage areas. All areas associated with the facility's operations are located on hardstanding whilst narrow landscaped areas are located along the perimeter of the site.

Strategic Context

[REDACTED] is of strategic economic importance to Southern region and the State by virtue of its extensive regional supply chain and the high value of product which is exported to the UK and Europe. It also

contributes to the continued role of Clonmel as a location for large-scale industry providing employment for the surrounding area.



Replacement of Existing Energy Plant at [REDACTED] - Strategic Infrastructure Development

The thermal energy required to produce MDF in [REDACTED] is currently provided by three biomass boilers/heaters and one gas fired heater.

[REDACTED] is intending to replace the existing and aging energy systems serving the production process with two new state of the art biomass-fired energy plants, one for each of [REDACTED]'s production lines.

The new energy systems will see the introduction of modernised combustion, air filtration, and treatment systems in line with European emissions performance for the best available technology. This investment in renewable energy systems will increase the competitiveness and efficiency of the [REDACTED] manufacturing plant. The new energy plant will also allow [REDACTED] to reduce its carbon emissions by allowing the full production of heat demand to be provided from renewable biomass fuel reinforcing our commitment to being a sustainable business.

Due to the nature of the proposed development and the facilities regional economic importance, the development proposed at [REDACTED] is considered strategic infrastructure, requiring a planning application to be submitted directly to An Bord Pleanála under the 37E of the Planning and Development Act 2000. A planning application under the provisions for Strategic Infrastructure Development will be submitted alongside an Environmental Impact Assessment Report by Q4 2023.

Submission on the draft Clonmel Local Area Plan 2024-2030

The Southern Region RSES and the Tipperary County Development Plan 2022-2028 designate Clonmel as a 'Key Town' and 'Self-Sustaining Regional Driver', with strong capacity for enterprise and employment growth building on its strengths and specialties.

It is an objective of the draft Clonmel Local Area Plan 2024-2030 (Objective 4A) to support this role and the function of Clonmel as a strategic employment location. With respect to the [REDACTED] site, the site is zoned for 'general industry' in the extant Clonmel and Environs Development Plan 2013 and the objective with this zoning is to "provide for heavy industry and related uses". The draft Clonmel Local Area Plan 2024-2030 continues to recognise the economic and employment role of the [REDACTED] facility and continues to zone the site for 'General Industry'.

The Draft Clonmel LAP states the purpose of this General Industry Zoning is to provide for heavy/specialised industrial development. It is intended that this zoning will facilitate industry that may be associated with environmental emissions, including noise and odour (e.g. waste processing, aggregate processing, etc) and with intensive processing. This continued and consistent planning policy support in the Draft Clonmel LAP is welcomed by [REDACTED]

More generally, the Draft Clonmel LAP outlines that various factors are taken into account during the planning application stage for new development. These factors include density, height, massing, traffic generation, public health, design, and visual amenity. Additionally, potential nuisances such as noise, odour, and pollution are also considered by the planning authority.

With respect to Nature-Based Solutions, the Council is proactive in encouraging solutions that are harmonious with the environment. This includes nature-based surface water management, biodiversity initiatives, and urban greening measures as integral parts of new development.

Regarding Energy and Climate, the document supports community efforts to reduce energy consumption and adapt to climate changes. It encourages the local community to identify and implement measures that are in line with these goals.

Local Transport Plan and N24 at the Redmonstown Junction

The emphasis on Active Travel as contained within the proposed LTP, particularly in Section 6.2, is noted and supported.

It is also noted that a series of segregated cycle infrastructure has been proposed in this section to improve safety and comfort for cyclists across the network, including the current N24 as it routes eastwards out of the town centre. However, it is noted that whilst the proposed segregated cycle network will connect the large residential areas within the town centre, this provision does not extend out as far as the Redmonstown Junction (figure 6.30).

The strategy recommends (section 6.2.2) that segregated cycle facilities be extended further east to connect with large employers such as [REDACTED] and [REDACTED] but that in some locations, delivery of segregated infrastructure will be challenging and other means of delivering a high quality cycling environment will be considered, including, potentially, Rapid Build/quick win schemes.

[REDACTED] therefore proposes that, in support of this strategy, the speed limit on the current N24 be extended out to include the Redmonstown Junction such that the N24 from this point westwards to the town centre is enhanced as a shared environment for cyclists, as well as maintaining its function as the means of access to the town centre from the east. This function will serve to support the emphasis on Active Travel as contained within the proposed LTP as well as offering a suitable quick

win scheme and enhancing access by non-car modes to an existing large employer and offering overall benefits to the operation of this junction.

N24 and Clonmel Road Link 4

It is noted and recognised that the N24 Waterford to Cahir Public Consultation is currently progressing through Phases 1 to 4 of the TII's Project Management Guidelines (PMG) and is presently at Phase 2, the Options Selection stage. It is also noted that determination of a preferred transport solution for the scheme is anticipated in late 2023.

Whilst [REDACTED] continues to be supportive of the principal of overall improvement to the N24 there remain significant concerns we wish to raise with the planning authority. These concerns principally relate to the local Road links which have been identified within the Clonmel Urban Area to the north of the current N24 corridor, and note particularly that 3 of the off-line options retain a node, and hence potentially an interchange, with the new road alignment to the north of the [REDACTED] holding, as well as the retention of the Clonmel Road Link 4 scheme (Figure 6-7 of the Draft Transport Plan).

[REDACTED] understands that these road links have been retained as part of a traffic management plan for Clonmel, but as yet no traffic management plan or modelling has been made available as part of the consultation process to determine the potential impact on traffic flows within the vicinity of the [REDACTED] plant in association with either the Clonmel Road Link 4 scheme or the potential interchange to the north. The potential impact on the flow of traffic cannot therefore be reviewed and assessed to establish if such local road infrastructure provision will adversely impact on the [REDACTED] operation and traffic activity to and from the plant.

[REDACTED] wishes to be consulted on the future traffic and layout modelling for any road schemes that involve the plant site in respect of either N24 works or the Clonmel Road Link 4 scheme. [REDACTED] confirms that there will be an increase in operational traffic in and out of [REDACTED] plant should the development go ahead as is currently proposed, and that a traffic assessment has been undertaken by SLR as part of the planning process and this information will be submitted as part of the application package. [REDACTED] wishes to agree that any future modelling work will take this traffic assessment work into account when any modelling of the Clonmel Road Link 4 scheme or the potential interchange to the north is undertaken.

We also kindly request that the full extent of the site and the economic development constraints is fully factored into any detailed design work with respect to the Clonmel Road Link 4 scheme. It is imperative, for the continued success of the operations that any future corridor respects the [REDACTED] site's boundary and is drawn outside of them. To do otherwise, in the context of the long established commercial operations on the site, the zoning of the site and the direct and indirect employment generated by the operations would be unreasonable and would undermine the continued development of the site.

On behalf of our client, [REDACTED] we welcome your full consideration of the above submission.

Yours sincerely

SLR Consulting Ireland

Aislinn O'Brien

Technical Director -Planning

Cc: Muiris O'Suilleabhain, Medite DAC