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Clonmel Local Area Plan,
Planning Department,
Tipperary County Council,
Civic Offices,
Emmet Street,
Clonmel,
Co. Tipperary.

11th September 2023

RE: Submission to the Draft Clonmel and Environs Local Area Plan 2024-2030.

SRA File Ref: LP 23/006

A Chara,

I refer to your notice of the preparation of the Draft Local Area Plan (LAP) for Clonmel 2024-2030 received on 28th July 2023.

The Southern Regional Assembly (SRA) welcomes this opportunity to make a submission on the Draft Plan and commends the continued work being undertaken as part of the preparation of a new statutory LAP for Clonmel. This is an important next step in the strategic planning framework for Co. Tipperary following on from the adoption of the Tipperary County Development Plan 2022-2028, and recognition of Clonmel as one of six Key Towns in the Region with a very significant population scale and self-sustaining regional drivers, in the Regional Spatial & Economic Strategy for the Southern Region (RSES).

This submission is intended primarily to assist and support the Council in ensuring the principles set out in the LAP align with the Development Plan, RSES and National Planning Framework. It also intends to ensure Clonmel can maximise its potential and investment under Project Ireland 2040 and the National Development Plan and promote its transition to a more sustainable settlement pattern. The submission addresses the following themes:

A: Role of Clonmel as a Key Town

B: Town Centre First Approach and Compact Growth

C: Economic Development and Enterprise Strategy

D: Sustainable Transport and Mobility

E: Climate Action and Sustainability

F: Environmental Assessment

A: Role of Clonmel as a Key Town

The SRA notes and welcomes the recognition of the role of Clonmel as a Key Town throughout the Draft Plan. Regional Policy Objective (RPO) 17 *Clonmel* of the RSES aims:

- 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;*
- b. To develop Clonmel's economic synergies and potential within the Limerick Waterford east west axis through improvements and upgrading of the N24 Waterford Limerick strategic route and improvements in public transportation;*
- c. To strengthen 'steady state' investment in existing rail infrastructure and seek investment for improved infrastructure and services to ensure its continued renewal and maintenance to a high level in order to provide quality levels of safety, service, accessibility and connectivity including improved frequency and journey times;*
- d. To support planned place-making initiatives identified – redevelopment of Kickham Barracks and Clonmel Flights of Discovery;*
- e. To support the continued development of Clonmel as a Tourist Centre in Ireland's Ancient East and Munster Vales;*
- f. To support the delivery of the infrastructural requirements identified for Clonmel subject to the outcome of the planning process and environmental assessments;*
- g. It is an objective to continue to realise the potential economic benefits of higher education activity in Clonmel and to support existing higher education providers— noting also the potential collaboration with the future TUSE—in further enhancing the impact of higher education on the town and wider region.*

The inclusion of these key aspects of the RSES in the various chapters of the Draft Plan are of key importance in ensuring it develops to its potential and grows in a planned and sustainable manner.

B: Town Centre First Approach and Compact Growth

In terms of the overall planning and development strategy for Clonmel, the SRA particularly welcomes the proactive approach shown by the inclusion of a specific chapter *Town Centre Strategy*, and the strategy statement: *'The Town Centre Strategy for Clonmel will seek to ensure that the vibrancy and vitality of the town is maintained and enhanced. The town centre will be a place which attracts, enables and facilitates immersive and interactive experiences for residents and visitors through festivals, events, and activities on its streets and public spaces. This will be achieved by increasing the residential population of the town centre,*

regenerating town centre brownfield lands, implementing and delivering the local town centre focused strategies for the town, and providing a high-quality, pleasant and enjoyable town centre environment focussed on active modes of travel.'

The success of the Council in attracting funding such as the URDF to develop this framework is noted and will help achieve further success in this area. The redevelopment of Kickham Barracks and Clonmel Flights of Discovery are supported by the RSES. The SRA particularly welcomes the inclusion of *Appendix 3: Schedule of Regeneration Sites* as part of the Draft Plan, noting that Masterplans have already been prepared to guide the development of the Kickham Barracks site and Suir Island. The preparation of the *Town Centre First Clonmel Action Plan* is also noted. The importance of ensuring excellence in the design approach to developing these sites will be a key factor in attracting people to live, visit and work in Clonmel. RPO 31 *Sustainable Place Framework* of the RSES supports this approach, promoting the development of quality places through integrated planning and consistently excellent design. In addition, RPO 34 *Regeneration, Brownfield and Infill Development* provides guidance on developing urban infill and brownfield sites. It is important that sites close or within the town centre are developed in line with these principles.

The SRA also commends the public realm enhancement schemes and wayfinding projects set out, including the new civic plaza already completed as part of the Kickham Barracks, widening footpaths, improving crossing points and establishing new connections. The adoption of the 10 Minute Town Concept in accordance with the SRA's *10 Minute Towns Accessibility & Framework Report*, where short travel time and ease of access via sustainable travel modes is achieved between where we live, work, access services, access recreation and amenity is welcomed.

In terms of compact growth targets, NPO 3c of the NPF and RPO 35 *Support for Compact Growth* of the RSES state that 30% of all new homes should be located within the existing built-up footprint of the settlement, which is defined as the CSO urban settlement boundary. Appendix 1: Serviced Land Assessment (SLA) of the Draft Plan states that consolidation and infill development underpin the development strategy of the LAP, with the principle of compact growth embedded in the SLA and resultant land zoning map.

The Draft Plan sets out a requirement for approximately 85.3 ha. of serviced/serviceable residential lands by 2030 which accords with the figures for Clonmel set out in Table 2.4 *Core Strategy Table* of the Development Plan. However, it is noted that the quantum of land zoned *New Residential* is stated as 96.04 ha. This is in addition to the land zoned Urban Core (56.17 ha. with a 30% residential share); Mixed Use (20.91ha with a 30% residential share); and Regeneration (6.79 ha with a 50% residential share), as well as Strategic Reserve (43.15 ha. for long term strategic and sustainable development to deliver housing within the subsequent development plan period). To ensure consistency with the Core Strategy of the Development Plan, the amount of land zoned should be in line with the amount required as per the Development Plan methodology and clarification is sought on this point. This would also ensure that the plan aligns with its objectives of compact and sequential growth, embracing the Town Centre First approach.

It is noted that a residential density figure of 25 dph is used to apply to all lands where residential use is permitted, including the Urban Core and Regeneration. However higher density targets should be considered particularly for sites within the town centre and close to public transport services. This would reflect the importance of Clonmel as a Key Town and

with the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)* (2009), which promotes higher densities for cities and larger towns. It should also be noted that the *Sustainable and Compact Settlements Guidelines for Planning Authorities (2023)*, which is currently at draft, public consultation stage, states that residential densities in the range of: 40-150 dph (net) be applied in town centres; 30-50 dph (net) generally be applied in suburban and edge locations; and up to 80 dph (net) open for consideration at accessible urban locations in Key Towns. The *Good International Practice: minimum densities for 10-minute city and town neighbourhoods* example included in Section 3.9 *Placemaking* of the RSES, notes how international experience shows that the critical density at which a large portion of people will change to accessing services by foot and bicycle is approximately 10,000-12,500 people per square kilometre.

C: Economic Development and Enterprise Strategy

The SRA welcomes the inclusion of policies within the Draft Plan to promote Clonmel as a self-sustaining regional economic driver and centre of employment and economic activity within the Region, recognising its strong capacity for enterprise and employment growth building on its strengths and specialties, including its strategic location on the Waterford-Limerick N24 and rail corridor, major employment centre and strategic landbanks including Ballingarrane Business, Science and Technology Campus. Chapter 4.0 Economic Development Strategy also promotes the town centre as a key employment location, encouraging new enterprise uses in the town centre, including shared working spaces and facilities for start-up business and enterprises. It also states that the development of brownfield sites and reuse of existing buildings for employment uses supports the town centre first ethos. In addition to Ballingarrane Park, which is supported for further development as a strategic employment location for Clonmel under the RSES, the Draft Plan includes a significant amount of additional land zoned for Employment use outside the town centre. While the role of Clonmel as a major employment centre should be promoted, it is important that sites close to the town centre are prioritised in the first instance, so that people living in the town can walk or cycle or people travelling to the town for work could use public transport rather than promoting more car-dependent developments.

In terms of tourism development, the Draft Plan recognises the potential of Clonmel, with its location along the River Suir Blueway and its medieval and industrial heritage as a tourist centre in Ireland's Ancient East and Munster Vales, as set out in the RSES. The support for the vision of the Clonmel Flights of Discovery, including the development at Dowd's Lane Vat House, Suir Island and West Gate, is welcomed.

The proposal to work with Technical University of Shannon and the Education and Training Board to deliver a co-located, third and further education campus facility on Kickham Barracks will further enhance the impact of higher education on the town and wider region, delivering on the SRA's *Towards a Learning Region*, aiming to move us towards establishing a Learning Region.

D Sustainable Transport and Mobility

The SRA welcomes the preparation of the Local Transport Plan for Clonmel as part of the LAP process. RPO 157 *Local Transport Plans (LTP)* of the RSES, notes how LTPs maximise the

opportunities for the integration of land use and transport planning, prioritise the delivery of sustainable and active travel, identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets and identify the transport interventions required within the plan area and in the wider context, to effectively accommodate the anticipated increase in demand. The preferred strategy of the Clonmel LTP to support a positive modal shift to sustainable transport is welcomed, as are the demand management measures to improve the pedestrian and cycle environment, including a speed limit zone within the town centre and residential areas; safe routes to schools; Park & Stride at key routes; and school and workplace Mobility Management Plans.

The LAP also recognises the strategic location of Clonmel on the Waterford-Limerick road (N24) and rail corridor with onward linkages to the mid-west and south-west, as well as being the main centre in a linear network of towns in South Tipperary (including Carrick On Suir, Cahir, and Tipperary Town) that form part of the strategic inter-regional transport and economic corridor between Waterford and Limerick. The proposed upgrade and improvement of the N24 Limerick to Waterford Corridor is supported by RPO 167 *National Road Projects* of the RSES.

E Climate Action and Sustainability

The SRA welcomes the inclusion of policies in the Draft Plan on tackling climate change and transition to a low carbon economy including nature-based solutions, natural heritage and blue/green infrastructure. This includes the Heritage Trail and River Suir Blueway which endorses the SRA's approach in promoting a Green and Liveable Region. The SRA's *Our Green Region - a Blue Green Infrastructure and Nature-based Solutions Framework for the Southern Region* would provide further support and guidance in developing this concept. The proposal to require the redevelopment of public spaces and opportunity sites to provide well-designed public spaces accessible to all, supporting the provision of dedicated playground spaces, as well as the provision of allotment space is also a welcome approach.

F Environmental Assessment

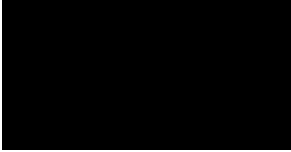
We note the preparation of Strategic Environmental Assessment (SEA) Reports, Natura Impact Report in support of the Appropriate Assessment (AA) and Strategic Flood Risk Assessment published alongside the Draft Plan. The Planning Authority should note that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Tipperary County Council review these documents to inform the Council's own environmental assessments and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final LAP where relevant.

Conclusion

The SRA welcomes the public consultation at draft stage for the preparation of a new Local Area Plan for Clonmel.

Further engagement between the SRA as a key stakeholder and the Forward Planning Section of Tipperary County Council in the final phase of the Local Area Plan is encouraged. The RSES team is available for further consultation and for any clarification required regarding this submission.

Mise le meas,



David Kelly

Director, Southern Regional Assembly