

SUBMISSION ON DRAFT CLONMEL LAP 2024-2030

We wish to have the Draft Clonmel LAP 2024 – 2030 amended to take account of our comments under the following headings:

1. Infrastructural deficits at Moangarriff
2. Proposed zoning of lands west of Meadowlands Estate, Moangarriff
3. Planning history associated with lands west of Meadowlands.

1. Infrastructural deficits at Moangarriff:

a) Water supply services are currently inadequate and unreliable.

For the past year in particular, existing public water supply users have experienced several disruptions including low water pressure, lack of water supply, and water quality concerns including boil water notices.

b) Road infrastructure serving Moangarriff area is not meeting safety needs of existing road users. Moangarriff roundabout is dangerous because vehicular traffic on N24 entering the roundabout from the eastern and western directions is capable of doing so at speed thus endangering all vehicular traffic using the roundabout including traffic entering from Moangarriff road and from Clonmel town directions. The current roundabout & N24 layout does not encourage N24 traffic to slow down before entering the roundabout. It encourages N24 traffic to enter the roundabout at speed because N24 road and roundabout configuration allows some roundabout exiting traffic to practically drive straight through the roundabout without having to make any significant turning movements.

c) Moangarriff road is not meeting safety needs of existing road users for following reasons

- conflict between residential & non-residential vehicular traffic particularly at entrances to Applegreen, Southern Gas & Pulse near junction with Moangarriff roundabout
- dangerous junction between Moangarriff road and Lower Moangarriff due to restricted visibility caused by bend north of junction.
- threat to non-vehicular road users due to above issues & due to the absence of a continuous footpath from Meadowlands estate to roundabout
- lack of safe road-crossings for non-vehicular road users travelling from Meadowlands - & Moangarriff to Clonmel Town and to River Suir Greenway via entry point on Waterford Road.

2. Proposed zoning of lands west of Meadowlands Estate:

We refer to following lands:

a) Site numbers 26 & 27 on Map 1 Map 1: SLA for Lands available for new residential development (See APPENDIX 1 – SERVICED LAND ASSESSMENT)

According to criteria set out in Appendix 1 as drafted, it is not understood how these sites meet the criteria for zoning for housing. Therefore these sites should be de-zoned.

b) Site number 8 on Map 2: SLA for Lands available for employment use (See APPENDIX 1 – SERVICED LAND ASSESSMENT)

According to criteria set out in Appendix 1, it is not understood how this site meets the criteria for zoning as proposed.

3. Planning History associated with lands west of Meadowlands Estate, Moangarriff:

In addition to having regard to the current infrastructural issues itemised above and in addition to the conflict with current assessment criteria in Draft Plan now under consideration, we would also ask that previous Local Authority policy on the development of these sites be taken into account.

Previous Local Authority policy is set out in the following documents:

1. Planning Application File [REDACTED]

The Planning Authority was proposing to refuse planning permission for housing due to unsuitability of Moangarriff Rd. [REDACTED]

Planning department report date 18/4/2000 stated that Moangarriff road is not suitable for the traffic that would be generated by proposed development of 105 houses.

2. De Jong Report (Planning Consultant report commissioned by the Local Authority and prepared following public consultation meetings with local residents).

3. County Development Plan 2008.

Based on above documents, Local Authority policy between the years 2000 and 2013 was that all lands west of Meadowlands Estate and bounded on the west by Gortnafleur Rd. were deemed suitable for housing. These lands to be accessed via Gortnafleur Road. The Moangarriff road was deemed unsuitable for accessing these lands for residential development purposes.

The 2013 Development Plan removed the planning certainty that prevailed up to then by making two significant material changes to the 2008 Development Plan – first by removing the 2008 Plan residential zoning for the portion of the lands west of Meadowlands which bordered Gortnafleur Rd and secondly by removing the reference to the unsuitability of Moangarriff Rd for access purposes.

These significant material changes were made in 2013 without any public consultation meetings with local residents.

These material changes resulted in the Local Authority being in a position to grant planning permission for housing development on site 26 with access via Moangarriff Rd. It would have been precluded from granting such a permission by the 2008 plan on the grounds that Moangarriff Rd was deemed unsuitable for access to new residential development.

It is difficult to understand how a road deemed unsuitable between years 2000 and 2012 can then be deemed suitable particularly since its unsuitability had been exacerbated by intensification of use by new commercial activities adjacent to the N24 junction.

In summary, previous Local Authority policy (as per 2000 to 2008 documents) for Moangarriff Rd and for lands west of Meadowlands Estate differs significantly from that now proposed in current Draft Clonmel LAP.

We are asking that the 2008 Development Plan reference to the unsuitability of the Moangarriff Rd for purpose of accessing new residential development be inserted into the Clonmel Lap 2024 – 2030.

The 2008 Plan policy about Moangarriff Rd and the lands west of Meadowlands estate, was arrived at in good faith after a number of public consultation meetings with local residents in Moangarriff area. Therefore, we are asking that this policy be restated and enshrined in the Clonmel LAP 2024 – 2030.

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11/08/2023