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11th September 2023

To Whom it Concerns,

RE: SUBMISSIONS ON DRAFT CLONMEL LAP 2024-2030

We write on behalf of our client, [REDACTED] – who own and operate the [REDACTED] at [REDACTED] – to make the following submissions in relation to the Draft Consultation for the forthcoming Clonmel LAP, which is to replace the Clonmel Town and Environs Development Plan 2013 (as extended). Our client’s landholdings at [REDACTED] (outlined in red on the attached plans, and in fig. 1 below), which comprise lands measuring approximately 63 hectares [REDACTED], fall within the boundary of the Clonmel Town and Environs Development Plan 2013.

We are grateful to the Council for taking into account our prior submission on the Pre-Draft Clonmel LAP and extending the LAP boundary to incorporate Clonmel racecourse. We fully support this revised LAP boundary and we ask the Council to ensure that the racecourse is included in the LAP boundary in the final adopted version of the Clonmel LAP. Further, we suggest that the text of the draft LAP be amended to acknowledge the crucial role that [REDACTED] plays in promoting tourism, generating employment, stimulating the local economy and offering recreational and amenity facilities.

The [REDACTED] site is bounded by land zoned Employment to the southwest (south of the N24) and to the southeast (south of Knockaun Court), and by a mix of Residential and Light Industry & Employment zoned land to the south (on the south side of the N24, either side of Powerstown Road).

We understand that the racecourse has been zoned ‘Open Space & Recreation’, which our client is committed to operating and improving over many years to come. However, the land along the southern periphery of the racecourse, which is in our client’s control, is surplus to the requirements of the racecourse operation. This substantial area of land measures approximately 17 hectares and we ask the Council’s forward planning team to consider the potential of this surplus land when developing the ‘strategic land use vision’ for Clonmel. The area highlighted in yellow in fig 1 below identifies the land that is surplus to the requirements of the racecourse operation

Fig. 1: Clonmel Racecourse



██████████ would be well disposed towards releasing surplus land for development to help meet the Council’s housing target, retail needs, or commercial floorspace requirements, and we would suggest the following two potential options for rezoning this land.

Option 1

The small site in blue in fig. 2 below is an area for which our clients are most keen to have zoned for development (‘light industry’) in the short-term as they are already in discussions with potential occupier, who has identified this site as suitable for their needs.

Fig. 2: Site suitable for zoning ‘Light Industrial’



This site is well suited to 'light industrial' a use due the nature and character of neighbouring uses. It falls directly opposite land that is zoned Light Industry & Employment and would therefore seem suitable for light industry given the site context and surrounding land uses. In addition, the site can be easily accessed from the N24 via Knockaun Court.

Development of this compact area could simply be facilitated without impacting on the operation of the racecourse site. Such development would strengthen the industrial offer at this end of Clonmel where it is most suited – being outside the town centre but close enough to facilitate linked trips thereby underpinning the viability of the centre and serving to promote sustainability.

We would be grateful if the forward planning team could give consideration to the appropriateness of zoning for such a land use during the preparation of the plan.

Option 2

In addition to the light industrial use on the small parcel of land favoured above, [REDACTED] would be well disposed towards a more comprehensive rezoning of the land to the south of the racecourse, that is in their ownership. We suggest that the Council's forward planning team should consider this land available, suitable and viable for a number of different development options, as it could potentially accommodate a mix of residential, commercial uses and light industry development. The site is also well suited for potentially tall buildings and medium to high density development.



The land is within convenient walking distance of Clonmel town and Clonmel Train Station, and should be considered a sustainable location for such mixed-use development. The land is also accessible from the national road network, being located just to the north of the N24. Our client is open to discussions on the release of all or part of this land for development.

We trust the above submissions will be of interest to the Forward Planning team, and we remain available for further discussion on the matter.

Yours faithfully,



DAVID ARMSTRONG *BA MRUP MRTPI MIPI*

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