



Comhairle Contae Thiobraid Árann  
Tipperary County Council

# Chief Executive's Report

## Part 1

Draft Clonmel & Environs  
Local Area Plan 2024 - 2030

Tipperary County Council Planning Policy and Projects Unit

October 2023



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## **1.0 Introduction**

### **1.1 Context**

Tipperary County Council commenced the process of preparing a new Local Area Plan (LAP) for Clonmel on 28 July 2023 with the publication of a Section 20 notice and the Draft LAP. Once the new LAP is made and has effect, it will replace the Clonmel & Environs Development Plan 2013 (as varied).

The Draft LAP was made available for a period of 6 weeks from 28 July 2023 to 11 September 2023 and submissions were invited from stakeholders and the public during this time. This report provides a summary of the submissions and observations received during the public consultation process and provides the Chief Executive's considerations and recommendations on the submissions and observations received.

### **1.2 Format of the Report**

The report is set out over two parts:

- Part 1 sets out the process, legislative requirements, submissions received and the consideration and recommendations on these submissions.
- Part 2 provides a detailed list of all recommended changes to the Draft LAP arising from the consideration of submissions received.

### **1.3 Legislative Background and Requirements**

Section 20 of The Planning and Development Act 2000 (as amended) ("the Act") sets out the requirement to prepare a Chief Executive's Report ("the CE's Report") following the public consultation period for the Draft LAP; and requires that no later than 12 weeks after the publication of the Draft LAP i.e. no later than 20 October 2023, issue the CE's Report to the Elected Members.

The CE's Report must: (i) provide a list of persons who made submissions or observations; (ii) summarise those submissions; and (iii) provide the opinion or recommendations of the Chief Executive in respect of those submissions received.

## **1.4 Public Consultation**

Section 20 of the Act sets out the requirements for local authorities in undertaking public consultation. As outlined above, the Draft LAP was available to view and to make submissions and observations on from 28 July 2023 to 11 September 2023. In addition to the statutory requirements, and to further make statutory bodies, residents, businesses and the local community aware of the Draft LAP, the following was undertaken:

- A public consultation drop-in event was held on Wednesday, 23 August 2023 at Clonmel Public Library.
- The Public Participation Network (PPN) circulated details of the process to their members;
- Targeted letters were sent to local community groups;
- A dedicated webpage was set up on the Tipperary County Council consultation portal;
- Regular updates and reminders were posted on the Council's social media pages;
- Posters were erected at various locations in the town;
- Articles on the Draft LAP consultation were published in the local press.

## **1.5 Submissions to Draft LAP**

119no. submissions were received within the statutory consultation period. These are listed in Section 2.0. All submissions received are summarised in Section 3 of this report and a consideration and recommendation from the Chief Executive in respect of each is set out.

2no. submissions were received outside the statutory consultation period. No considerations or recommendations have been provided on these submissions.

## **1.6 Environmental Assessment and Strategic Flood Risk Assessment**

The Draft LAP has been subject to Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. As a result of these processes the following reports were published in support of the Draft LAP:

- Strategic Environmental Assessment Environmental Report (including a Non-Technical Summary),
- Appropriate Assessment Natura Impact, and
- Strategic Flood Risk Assessment.

Section 20(3)(f) of the Act requires a determination to be made as to whether Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) is required in respect of any proposed material alteration of the LAP. This process will be undertaken once the proposed material amendments are finalised following the Plenary Meeting on 27 October 2023.

## **1.7 Next Steps**

This report is now submitted to the Elected Members of the Council for their consideration. A workshop will be held with the Elected Members of the Clonmel Borough District on Tuesday, 10 October 2023 to facilitate consideration of this report and recommendations contained therein. The matter will be brought before the Elected Members at the Plenary Meeting on 27 October 2023.

As material amendments are recommended by the Chief Executive to the Draft LAP, a further period of public consultation for a minimum of 4 weeks is required. This is subject to the agreement of the Elected Members. Publication of the Material Amendments to the Draft LAP would take place from Friday 17 November 2023 until Monday 18 December 2023, if agreed.

## 2.0 List of Submissions Received

The following is a list of the submission received during the submission period:

No.	Name	Submission Type
102.	Office of the Planning Regulator (OPR)	<b>Statutory Consultees, State Bodies, other Government Departments and Internal Council Departments (15)</b>
112.	National Transport Authority (NTA)	
53.	Transport Infrastructure Ireland (TII)	
52.	Department of Transport (DoT)	
92.	Office of Public Works (OPW)	
4.	Environmental Protection Agency (EPA)	
94.	Uisce Eireann (UE)	
88.	Department of Environment, Climate and Communications	
61.	Department of Education (DoE)	
96.	Electricity Supply Board (ESB)	
118.	Department of Housing, Local Government and Heritage	
90.	David Kelly, Southern Regional Assembly	
104.	HW Planning, on behalf of IDA Ireland	
60.	RMLA Planning, on behalf of An Post	
50.	Sinead Carr, Director of Services, Tipperary County Council Housing Division	

<b>1.</b>	Cllr. Michael Murphy, on behalf of Fine Gael Group – Clonmel Borough District	<b>Local Bodies / Groups / Organisations (8)</b>
<b>13.</b>	J.J. Killian, Clonmel Rugby Club	
<b>14.</b>	Brendan Cagney, St. Mary's Hurling and Camogie Club	
<b>32.</b>	Ruth Maher, Clonmel Rowing Club	
<b>42.</b>	Shane Egan, Tipperary Energy Agency	
<b>62.</b>	Martin Bourke, on behalf of Construction Studies Group, CBS High School Clonmel	
<b>74.</b>	Deirdre Murray, Clonmel Tidy Towns	
<b>103.</b>	Deirdre Murray, Clonmel Tidy Towns	
<b>85.</b>	Joe Ryan, on behalf of Residents of Moangarriff	<b>Zoning Related Submissions (12)</b>
<b>86.</b>	Tony Bamford Planning Consultants, on behalf of Began Property Ltd.	
<b>91.</b>	John Long, Barne Accessories	
<b>93.</b>	Michael & Anne Fitzgerald	
<b>95.</b>	David Armstrong, Armstrong Planning, on behalf of Powerstown Park Ltd.	
<b>98.</b>	Ciaran Dineen, McCutcheon Halley Planning Consultants, on behalf of Melclon Unlimited Company	

<b>99.</b>	David Mulcahy Planning Consultants, on behalf of The Treacy Group	
<b>101.</b>	Stephen Ward Planning Consultants, on behalf of South City Ltd.	
<b>108.</b>	Tom Philips & Associates Planning Consultants, on behalf of Casana Developments Ltd.	
<b>109.</b>	Morrissey Construction Ltd.	
<b>111.</b>	Cummins & Voortman Ltd., on behalf of Patrick Long, Rosemary Hutch, Frances O'Connor, Jessica Long, Sarah Long and Elaine Long	
<b>119.</b>	Tom Philips & Associates Planning Consultants, on behalf of Casana Developments Ltd.	
<b>Individual Submissions (84)</b>		
<b>2.</b>	Cllr. Michael Murphy	
<b>3.</b>	Will McGarry	
<b>5.</b>	Darragh Ryan	
<b>6.</b>	Jessica Kenny	
<b>7.</b>	Kevin Walsh 80	
<b>8.</b>	Caitriona Nagle	
<b>9.</b>	James Duffy	
<b>10.</b>	Eoin Kenny	
<b>11.</b>	Elizabeth O'Hara	
<b>12.</b>	Cllr. Richie Molloy, on behalf of Keith & Shirley Conway	



<b>15.</b>	Cllr. Niall Dennehy
<b>16.</b>	Robert & Ciara Hannon
<b>17.</b>	Anne & Tom Hannon
<b>18.</b>	Cllr. Richie Molloy
<b>19.</b>	Gearóid Fitzgibbon (SEAI Tipperary County Sustainable Energy Community Mentor) 70
<b>20.</b>	Shauna Keane
<b>21.</b>	Niall Prendergast
<b>22.</b>	Bernard & Rosie Cunningham
<b>23.</b>	Seamus Lawlor
<b>24.</b>	John & Nancy O'Driscoll
<b>25.</b>	Jamie Cahill
<b>26.</b>	Sandra Lawlor
<b>27.</b>	Siobhan McGrath
<b>28.</b>	Shane Walsh
<b>29.</b>	Jennifer Boland
<b>30.</b>	Sharon Fitzgerald
<b>31.</b>	Linda Collins
<b>33.</b>	Jason & Aine Cunningham
<b>34.</b>	Sarah & Paddy Codd
<b>35.</b>	Pamela Treacy

<b>36.</b>	Niall Brannigan
<b>37.</b>	Catherine & Gerry Treacy
<b>38.</b>	Kathleen O'Brien & Alma O'Brien
<b>39.</b>	Barry & Aoife O'Driscoll
<b>40.</b>	Paul Fitzgerald & Sinead O'Brien
<b>41.</b>	Keith & Shirley Conway
<b>43.</b>	Thomas Ryan
<b>44.</b>	Cllr. Richie Molloy
<b>45.</b>	Cllr. Pat English
<b>46.</b>	Ciaran Lorigan
<b>47.</b>	Mairead O'Toole
<b>48.</b>	David Lorigan
<b>49.</b>	Tom Lorigan
<b>51.</b>	Brian Heffernan
<b>54.</b>	John Keating
<b>55.</b>	John Heffernan
<b>56.</b>	Anthony Power
<b>57.</b>	Anthony Power
<b>58.</b>	Anthony Power
<b>59.</b>	Anthony Power

<b>63.</b>	Downey Planning, on behalf of Amy O'Driscoll and Stephen Cunningham	
<b>64.</b>	Brian McCarthy	
<b>65.</b>	Joe Ryan	
<b>66.</b>	Karen Ferris	
<b>67.</b>	Kate Acheson 30	
<b>68.</b>	Edel O'Gorman	
<b>69.</b>	Niall J. Dennehy	
<b>70.</b>	Suzanne Moran	
<b>71.</b>	Gerard & Ian Byrne	
<b>72.</b>	Declan O'Brien	
<b>73.</b>	Denis & Joan O'Brien	
<b>75.</b>	Cllr. Siobhán Ambrose	
<b>76.</b>	Cllr. Siobhán Ambrose	
<b>77.</b>	Cllr. Siobhán Ambrose	
<b>78.</b>	Cllr. Siobhán Ambrose	
<b>79.</b>	Cllr. Siobhán Ambrose	
<b>80.</b>	Cllr. Siobhán Ambrose	
<b>81.</b>	Cllr. Siobhán Ambrose	
<b>82.</b>	Cllr. Siobhán Ambrose	
<b>83.</b>	Cllr. Siobhán Ambrose	

<b>84.</b>	Aine Purcell	
<b>87.</b>	SLR Consulting, on behalf of Medite DAC	
<b>89.</b>	Sarah Conway	
<b>97.</b>	William Trehly	
<b>100.</b>	Cllr. Siobhán Ambrose	
<b>105.</b>	Myriam Madigan	
<b>106.</b>	Eoin Doyle, ARUP	
<b>107.</b>	Cllr. Siobhán Ambrose	
<b>110.</b>	Mattie McGrath, TD	
<b>114.</b>	Aine & John Cullinan	
<b>115.</b>	Laurence Martin	
<b>116.</b>	John & Mary O’Gorman	
<b>117.</b>	Brenda & Kevin O’Connor	
<b>120.</b>	Chris & Breda Lee	

The following submissions were received outside of the statutory consultation period and therefore cannot be considered:

<b>Name</b>	<b>Submission Type</b>
Michael Gallagher	Individual Submission
Paul & Nell McCarthy	Individual Submission

## 3.0 Summary and Consideration of Submissions

### 3.1 Statutory Consultees, State Bodies, and other Government Departments and Internal Council Departments

<b>Submission Number:</b> 102	<b>Submission Name:</b> Office of the Planning Regulator (OPR)
<b>Submission Summary</b> <p>The submission is prepared pursuant to the OPR's statutory role (Section 31AO of the Planning and Development Act 2000, as amended) which is to ensure consistency with legislative and policy requirements relating to planning. The points made in the submission are outlined below under the headings in which they are presented in the submission:</p> <p><b>Overview</b></p> <p>The submission commends the significant work of the planning authority in preparing a comprehensive draft plan for Clonmel.</p> <p>The submission considers the Draft LAP to be generally consistent with the regional policy objectives of the RSES for the Southern Region, particularly in respect of its overall strategy to promote compact growth, target town centre renewal and promote more sustainable travel patterns.</p> <p>The submission also welcomes the strategic aims and vision of the Draft LAP which have been informed by collaboration and consultation with relevant stakeholders and the general public.</p> <p>The submission refers to the town centre regeneration strategy for Clonmel as set out in Chapter 3 of the Draft LAP, and commends a clear Town Centre Strategic Vision that sets out a strong town centre first policy approach.</p> <p>The submission considers that the actions of the Climate Action Plan 2023 and the Tipperary County Development Plan 2022-2028 core ambitions have also been well incorporated into the Draft LAP as they relate to spatial planning locally within the town including compact growth, sustainable mobility, sustainable transport measures, town-centre first, nature-based solutions, and flood risk and water management.</p>	

The submission does however identify a number of areas where further consideration is required to ensure that zoned land can be serviced and is well located in terms of proximity to facilities and amenities and sustainable transport options, consistent with the policy of the Development Plan and national and regional policy for compact and sustainable growth.

Furthermore, the submission raises concerns regarding the Strategic Flood Risk Assessment (SFRA), which requires further consideration.

These issues are presented under 6 themes in the submission with 4 recommendations and 2 observations.

The points made in the themes are outlined below under the relevant theme subheading:

### **1. Consistency with development plan core strategy, residential zoning and compact growth**

The submission is satisfied that the population and housing growth for the plan period is consistent with the Development Plan.

The submission considers that in general terms, the Draft LAP provides a reasonable approach to ensure a sufficient supply of zoned land.

The submission considers that the majority of the lands proposed to be zoned New Residential are well located, contiguous to the existing built up footprint and within the CSO settlement boundary.

The submission notes that a Local Transport Plan (LTP) was undertaken to inform the zoning provisions of the Draft LAP and that a suite of active travel measures and other sustainable transport objectives are proposed to enhance connectivity between the proposed residential areas and the town centre.

The submission commends the inclusion of a detailed SLA prepared in accordance with National Planning Framework NPO 72.

However, the following issues are identified:

- i. The submission identifies a number of instances where poorly located sites are identified for Strategic Reserve in circumstances where more than sufficient New Residential land is zoned to meet future housing needs, the lands were not previously zoned, and that no adequate justification has been provided to designate further strategic reserve lands.

Referring to the Serviced Land Assessment (SLA) contained in Appendix 1 to the Draft LAP, these sites are identified as Site 1 (4.6ha), Site 3 (7.3ha) and Site 27 (18.4ha).

**Recommendation 1(i)** - *delete the Strategic Reserve zoning objective for Sites 1, 3 and 27 (referring to the Residential SLA – Appendix 1). Consideration should be given to amending the zoning to Town Environs.*

- ii. The submission has concerns regarding the number of smaller peripheral sites zoned Existing Residential on the outskirts of the town, undermining the principles of compact growth and sequential development criteria, and undermining the overall policy intent of the Town Environs land use zoning objective as it raises unreasonable expectations about further one-off housing and subdivision in isolated areas which are divorced from the built-up area.

**Recommendation 1(ii)** - *amend the Existing Residential zoning objectives on lands associated with the isolated pockets of rural dwellings predominately located to the peripheries of the Draft LAP boundary to Town Environs.*

- iii. The submission identifies the following anomalies between the zoning map and the SLA:
- inconsistent approach adopted in the SLA regarding the identification of sites as complying with the sequential criteria, particularly in relation to sites 11 and 24.
  - a number of sites, including sites 7, 8, 17, 19, 21, 22, 23 and 25, are identified on the SLA Table 1 as being able to deliver new residential development but are zoned Existing Residential on the zoning map.

**Recommendation 1(iii)** - *review the SLA Table 1 in Appendix 1 of the Draft LAP, Table 8 and Table 9 in the written statement and the zoning map to ensure consistency and accuracy, including the identification of sites as sequentially appropriate, with a particular review of sites which have the capacity to deliver new residential development but appear to be incorrectly identified as Existing Residential on the zoning map.*

## **2. Economic Development and Employment**

The submission welcomes the emphasis on enterprise and employment in the Draft LAP, recognising that the RSES designates Clonmel as a Key Town and Self-Sustaining Regional Driver with strong capacity for enterprise and employment growth.

The submission notes that the main tracts of available Employment land are located on the west side of the town comprising c. 105ha of land within the Ballingarrane masterplan area

and a further 132ha of land adjoining the Abbott Vascular and Boston Scientific campuses and the Ard Gaoithe Business Park. The submission further notes that the Ballingarrane Masterplan site is identified as a Strategic Employment Site accessed via the N24 which seeks to cater for high-tech, employment intensive industry and to support the town as the regional driver. In this regard, the submission considers that the quantum of land zoned for employment uses is generally acceptable having regard to the strategic objectives of the RSES (RPO 17) and the population growth anticipated for the town.

However, the submission has some concerns regarding site 2 located at the Cashel Road as identified in the SLA (referring to the Employment SLA contained in Appendix 1 to the Draft LAP) which is a significant land bank adjacent to the Ballingarrane Masterplan area.

**Recommendation 2** - *review the proposed phasing approach to the delivery of the employment land bank located to the northern fringes of Clonmel identified as Site 2 in the Serviced Land Assessment to ensure that development is delivered in an appropriate and sequential manner. The planning authority should also consider the intended movement patterns to / from and within the site in accordance with the LTP, as well as activation measures to ensure that the site is comprehensively developed as a major employment location in tandem with appropriate active travel measures.*

### **3. Transport and Mobility**

The submission welcomes the preparation of the Local Transport Plan (LTP) consistent with RPO 11 of the RSES.

The submission does however note that further consideration should be given to the integration and synergy between the LAP and the LTP, and that it is imperative that the Draft LAP reflects the guiding principles of the LTP to ensure that a cohesive overall land use strategy for the town is set out.

**Recommendation 3** - *the planning authority is required to include specific actions in the written statement of the LAP with respect to the key actions identified in the Clonmel Local Transport Plan (LTP) in order to clearly outline the guiding principles for improved permeability and sustainable land use and transportation management for Clonmel and to ensure that a cohesive land use strategy for the town is clearly set out.*

The submission recognises that the proposed N24 upgrade, including the 4 identified link roads, is a key piece of infrastructure which will enhance and sustain traffic movements and



connectivity for Clonmel. However, the submission notes that no indicative route alignments for the above road links have been indicated on the zoning map for Clonmel.

**Observation 1** - *the planning authority is requested to include on the land use zoning map the indicative route alignment of the proposed four link roads as set out in the Draft LAP and LTP.*

#### **4. Flood Risk Management**

The submission welcomes the preparation of an SFRA to inform the Draft LAP, however notes the following:

- the flood zones indicated on the flood zone maps have excluded areas benefitting from flood defences from the flood zone contrary to section 2.25 of the Flood Guidelines that the presence of flood protection structures should be ignored in determining flood zones.
- the 1% Annual Exceedance Probability (AEP) extents for the National Indicative Fluvial Mapping programme have not been used to inform the flood zone mapping. i.e. Flood Zone A
- the New Residential zoning to the south-west of the town (site 28 in the Residential SLA) falls within the Flood Zone B. This requires further review.
- While future scenario mapping for the National CFRAM study has been provided in the SFRA, it has not been overlaid with the land use map, and this should be addressed in the SFRA to provide clarity.
- The planning authority is also advised to review the flood zone designations for sites detailed in Appendix 3: Schedule of Regeneration Sites.

**Recommendation 4** - *the planning authority is required to:*

- (i) review and update the Strategic Flood Risk Assessment to ensure that the flood zone mapping estimates the full extent of potential flood risk and excludes the presence of flood defences in accordance with the guidance set out in section 2.25 of the Flood Guidelines. Clarity should also be provided in the Strategic Flood Risk Assessment regarding residual risk for lands that are considered to benefit from existing defences;*
- (ii) review and update the Strategic Flood Risk Assessment to ensure that 1% AEP extents are used to inform the flood zone mapping, i.e. Flood Zone A;*
- (iii) review the methodology and approach included in the Strategic Flood Risk Assessment to ensure that justification tests are completed for all land zonings that overlap with flood zones and to ensure that such tests are only carried out when avoidance and substitution*

*of the flood risk is not possible. The planning authority's attention is specifically drawn to New Residential site 28 to the south-west of the town centre which should be reviewed and rezoned, unless it can be demonstrated that the site complies with all of the criteria set out in the plan making Justification Test;*

*(iv) having regard to the corrected flood zone mapping, review the flood zone designations for all sites contained in Appendix 3: Schedule of Regeneration Sites to determine whether any of the sites detailed require a site-specific flood risk assessment. Clarification should be provided on the defended areas and any residual risks or mitigation measures that may be required for particular sites; and*

*(v) ensure that overlays of land use zoning and National CFRAM potential future scenario mapping are included in the SFRA.*

*Consequent to the above, the planning authority is required to omit or amend zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Flood Guidelines.*

## **5. Implementation and Monitoring**

The submission notes that the Draft LAP does not provide any tangible indicators for monitoring the objectives of the LAP, just a broad statement of intent aligned with a generalised approach in the Development Plan. It is considered that a more bespoke approach, specific to the Draft LAP, should be adopted.

**Observation 2** - *Having regard to section 6.5 of the Local Area Plans, Guidelines for Planning Authorities (2013), the planning authority is advised to include a clear implementation and infrastructural delivery schedule in the Draft LAP to ensure that the implementation of the policy objectives of the Draft LAP will take place and to ensure that development progress is consistent with the core strategy of the Development Plan.*

## **6. General and Procedural Matters**

In respect of more minor matters, the submission notes the following:

- greater clarity could be provided on the land use zoning map regarding the colour tones used to distinguish between sites zoned for Mixed Use, Amenity, Open Space and Recreation and Town Environs.

- for clarity, consideration should be given to the inclusion of the land use zoning objectives for Clonmel Environs that are located within the administrative area of Waterford City & County Council on the land use zoning map.

## Consideration

For clarity the considerations are presented under the sub-headings outlined in the foregoing submissions section:

### 1. Consistency with development plan core strategy, residential zoning and compact growth

The points made in respect of population and housing growth for the plan period being consistent with the Development Plan and the reasonable approach to ensure a sufficient supply of zoned land, are noted.

The points made in respect of the Local Transport Plan (LTP) undertaken to inform the zoning provisions of the Draft LAP and a detailed SLA prepared in accordance with National Planning Framework NPO 72, are noted.

**Recommendation 1(i)** requires that 'Strategic Reserve' zoning objective for Sites 1, 3 and 27 be deleted and that consideration should be given to amending the zoning to 'Town Environs'.

The submission notes that Sites 1, 3 and 27 identified for Strategic Reserve are poorly located in circumstances where more than sufficient New Residential land is zoned to meet future housing needs, and that that no adequate justification has been provided to designate further strategic reserve lands.

As outlined in Chapter 9 of the Draft LAP, the objective of the 'Strategic Reserve' zone is '*Long-term strategic and sustainable development sites*', with the corresponding description being '*Sites that may deliver housing within the subsequent plan period*'.

Section 2.4.3 of the Draft LAP outlines that the purpose of the Strategic Reserve is to ensure the availability of "*long-term strategic and sustainable development sites*" for the future growth of Clonmel, and that the development of these areas in a piecemeal or discordant way would prejudice the sustainable future development of the town. And that new development in lands zoned strategic reserve will not therefore generally be permitted.

To accord with the purpose of the zone, under the zoning matrix in Table 15 of the Draft LAP, 'Residential' is 'Not Normally Permitted' on land zoned 'Strategic Reserve'. This covers multi-

unit residential development and also single dwellings. The OPR's suggestion about changing the zoning to 'Town Environs' is noted, however a change to 'Town Environs' would open that land up to applications for rural one-off houses, which may prejudice the sustainable future development of the town. In all three cases (Sites 1, 3 and 27), the land adjoins a 'New Residential' zoning at locations which the Planning Authority considers to be the potential long-term residential growth direction of the town. Clonmel, by its geographic context, is constrained to the south by the Comeragh Mountains. The strategic direction of future growth therefore is east, west and north. To the west / northwest are the Ballingarrane masterplan lands the ambition for which is strategic employment to support the designation of the town as a regional growth driver; to the east are the heavy industry of Bulmers and Medite; therefore the north and north east of the town are the natural long term growth areas for residential. It should also be noted that the quantum of available 'New Residential' land is only marginally above the Core Strategy allocation for the town, therefore indicating that were 30% growth achieved in the short to medium term, further lands not previously zoned would need to be examined.

**Recommendation 1(ii)** requires that the Existing Residential zoning objectives on lands associated with the isolated pockets of rural dwellings predominately located to the peripheries of the Draft LAP boundary are amended to the Town Environs zoning.

This recommendation is noted. The zoning map will be amended accordingly.

**Recommendation 1(iii)** requires a review of the SLA Table 1 in Appendix 1 of the Draft LAP, Table 8 and Table 9 in the written statement and the zoning map to ensure consistency and accuracy, including the identification of sites as sequentially appropriate, with a particular review of sites which have the capacity to deliver new residential development but appear to be incorrectly identified as Existing Residential on the zoning map.

This recommendation is noted. A review of the SLA Table 1 in Appendix 1 of the Draft LAP has been carried out as follows:

- i. All sites in Table 1 have been reviewed, particularly sites 11 and 24 to ensure consistency in how sites are evaluated under the sequential criteria;
- ii. All sites referenced in Table 1 identified as being able to deliver new residential development but are zoned Existing Residential on the zoning map, specifically sites 7, 8, 17, 19, 21, 22, 23 and 25, have been reviewed, as follows:

- It is considered appropriate to change the zoning of sites 7, 8, 21, 22 and part of sites 19, 23 and 25 from 'Existing Residential' to 'New Residential'.
- Site 17 comprises land on which a 41-unit residential development (Reg. Ref. 21332) is now substantially complete. It is considered appropriate for this site to remain 'Existing Residential'.
- For sites 19, 23 and 25, the part of the developable site could be zoned 'New Residential' with the residual land containing an existing dwelling and immediate curtilage zoned 'Existing Residential'.

iii. Table 8 and Table 9 in the written statement and the zoning map have been reviewed accordingly.

## **2. Economic Development and Employment**

The point made that the quantum of land zoned for employment uses is generally acceptable having regard to the strategic objectives of the RSES (RPO 17) and the population growth anticipated for the town, is noted.

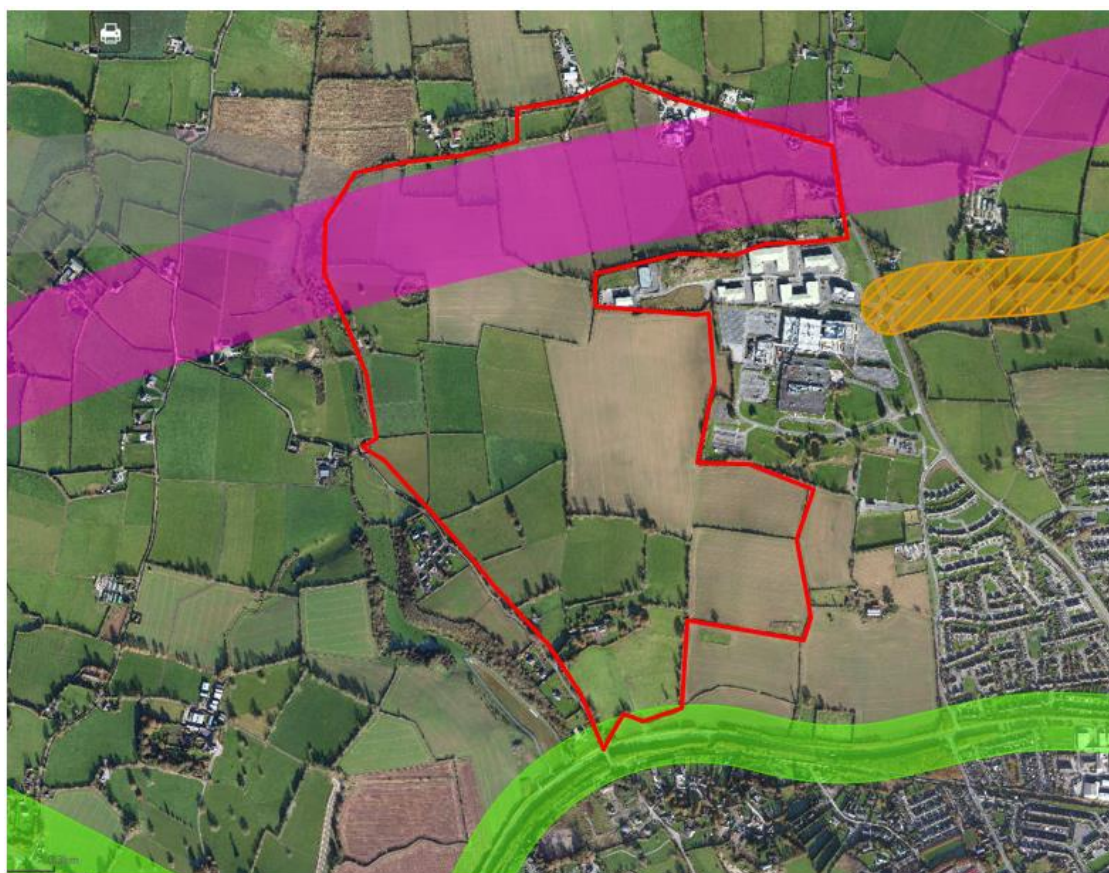
**Recommendation 2** requires a review of the proposed phasing approach to the delivery of the employment land bank located to the northern fringes of Clonmel identified as Site 2 in the Serviced Land Assessment to ensure that development is delivered in an appropriate and sequential manner. The planning authority should also consider the intended movement patterns to / from and within the site in accordance with the LTP, as well as activation measures to ensure that the site is comprehensively developed as a major employment location in tandem with appropriate active travel measures.

The landbank referred to in the OPR submission is identified as Site No. 2 in the Employment SLA (Appendix 1 to the Draft LAP). The northern half of the landbank adjoins the Ard Gaoithe Business Park and the established major employers of Abbot Vascular and Boston Scientific Campuses, both major employers for the town and region. Between them, these two companies employ upwards of 3,500 people, noting an announcement in May 2023 for a significant expansion of Boston Scientific that will create more than 400 additional jobs. And further noting proposals in the planning system for expansion at Ard Gaoithe Business Park.

The intent of the employment zoning at this location is to safeguard the expansion of these employment centres.

In terms of connectivity, a Part 8 scheme recently published for public consultation seeks to deliver approximately 1.3 km of active travel upgrades along the R688, Cashel road including extension of existing facilities for cyclists and pedestrians and the provision of new cyclist and pedestrian infrastructure, connecting the major employment area at Ard Gaoithe to the N24 Cashel Road Roundabout.

The points made in respect of sequencing, intended movement patterns and active travel are noted. The Council is fully committed to ensuring that this landbank is delivered in a plan led and co-ordinated approach in a similar fashion to the Ballingarrane Masterplan lands. To this end, it is recommended that a masterplan objective be included in the LAP. However, an overall framework for a masterplan, particularly parameters on access and sequencing of development, is heavily dependent on the outcome of the N24 Waterford to Cahir Scheme. Two of the proposed route options have particular implications for the landbank, namely the Green / Management Option for the existing N24 on the southern boundary of the landbank, and the Pink Option which has a route running through the northern end of the landbank. The map below shows the Employment zoned landbank (Site 2 in Employment SLA) in the context of the alignment of the Green/Management and Pink Route options.



### **3. Transport and Mobility**

The point made that further consideration should be given to the integration and synergy between the LAP and the LTP is noted.

**Recommendation 3** requires the planning authority to include specific actions in the written statement of the LAP with respect to the key actions identified in the Clonmel Local Transport Plan (LTP) in order to clearly outline the guiding principles for improved permeability and sustainable land use and transportation management for Clonmel and to ensure that a cohesive land use strategy for the town is clearly set out.

This recommendation is considered reasonable and will further align the LAP with the measures identified in the LTP.

**Observation 1** requests the planning authority to include on the land use zoning map the indicative route alignment of the proposed four link roads as set out in the Draft LAP and LTP.

The observation is noted. The 4no. road links referred to are as follows:

#### Road Link 1

Connects the R688 Cashel Road via Longfield Avenue east to an existing roundabout (south of the Paddocks housing estate) on the R689 Fethard Road;

#### Road Link 2

Continues Road Link 1 in an easterly to south-easterly direction to connect to the Carrigeen Roundabout on the N24 via the existing internal road serving the Carrigeen Business Park.

#### Road Link 3

Connects the R688 Cashel Road at the existing roundabout at Ard Gaoithe Business Park east to the R689 Fethard Road;

#### Road Link 4

Connects the R689 Fethard Road east through Powerstown to the L2506 at Redmondstown, directly between the Medite and Bulmers production sites.

These 4no. road links have been identified as part of a traffic management plan for Clonmel, to be assessed, either in isolation or in combination with other solutions in terms of their ability to reduce traffic volumes on the existing N24.

These road links were published as part of the wider “Alternatives and Options” for the N24 Waterford to Cahir road scheme. This was the second non-statutory public consultation on

the scheme and took place between 3rd and 20th May 2022. The purpose of this second consultation was to present the potential transport solutions to the public and to seek feedback to inform the design of the project. All potential solutions that were presented to the public are currently being assessed through a two-stage comparative assessment of their potential impacts, and their relative success in achieving the project objectives to determine the preferred solution for the project. The preferred solution is currently scheduled to be put on Public Display in Q3 2023.

As such, and referring to the TII submission (No. 53) and NTA submission (No. 112), it is considered pre-mature to include the indicative route alignment for these 4no. road links on a statutory land use zoning map.

#### 4. Flood Risk Management

**Recommendation 4** - *the planning authority is required to:*

- (i) review and update the Strategic Flood Risk Assessment to ensure that the flood zone mapping estimates the full extent of potential flood risk and excludes the presence of flood defences in accordance with the guidance set out in section 2.25 of the Flood Guidelines. Clarity should also be provided in the Strategic Flood Risk Assessment regarding residual risk for lands that are considered to benefit from existing defences;*
- (ii) review and update the Strategic Flood Risk Assessment to ensure that 1% AEP extents are used to inform the flood zone mapping, i.e. Flood Zone A;*
- (vi) review the methodology and approach included in the Strategic Flood Risk Assessment to ensure that justification tests are completed for all land zonings that overlap with flood zones and to ensure that such tests are only carried out when avoidance and substitution of the flood risk is not possible. The planning authority's attention is specifically drawn to New Residential site 28 to the south-west of the town centre which should be reviewed and rezoned, unless it can be demonstrated that the site complies with all of the criteria set out in the plan making Justification Test;*
- (vii) having regard to the corrected flood zone mapping, review the flood zone designations for all sites contained in Appendix 3: Schedule of Regeneration Sites to determine whether any of the sites detailed require a site-specific flood risk assessment. Clarification should be provided on the defended areas and any residual risks or mitigation measures that may be required for particular sites; and*



*(viii) ensure that overlays of land use zoning and National CFRAM potential future scenario mapping are included in the SFRA.*

*Consequent to the above, the planning authority is required to omit or amend zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Flood Guidelines.*

The points made around flood risk management are noted. Please refer to the response / recommendation in respect of the OPW submission (submission no. 92).

## **5. Implementation and Monitoring**

**Observation 2** – advises the planning authority to include a clear implementation and infrastructural delivery schedule in the Draft LAP to ensure that the implementation of the policy objectives of the Draft LAP will take place and to ensure that development progress is consistent with the core strategy of the Development Plan.

This is considered acceptable. It is recommended that a Local Planning and Development Implementation Plan is to be included as part of the LAP, which will list each objective and provide an implementation strategy.

## **6. General and Procedural Matters**

The submission raises two minor matters, as follows:

- i. Greater clarity could be provided on the land use zoning map regarding the colour tones used to distinguish between sites zoned for Mixed Use, Amenity, Open Space and Recreation and Town Environs.

Note that the colours used are a national standard in line with Appendix B to the Development Plan Guidelines for Planning Authorities 2022.

- ii. For clarity, consideration should be given to the inclusion of the land use zoning objectives for Clonmel Environs that are located within the administrative area of Waterford City & County Council on the land use zoning map.

Noted however it was not possible to arrange this within the timeframe.

## **Recommendation**

It is recommended that the following amendments to the Draft LAP are made:

1. The zoning objective of isolated single dwellings or pockets of isolated single dwellings on the periphery of the town to be changed from 'Existing Residential' to either 'Town Environs' or 'Strategic Reserve'. (See Amendment 81 in Part 2; and updated figures (in hectares) for zoning objectives at Amendments 56, 58, 59 and 60 in Part 2);
2. Amendments to Table 1 to ensure consistency in how sites are evaluated under the 'Availability of Infrastructure' and 'Sustainable Planning Criteria' (see Amendment 64 in Part 2);
3. On the Zoning Map, change the zoning objective for sites 7, 8, 21 and 22 from 'Existing Residential' to 'New Residential' (See Amendments 5, 6, 56, 59, 60 and 82 in Part 2)
4. On the Zoning Map, change the developable part of sites 19, 23 and 25 from 'Existing Residential' to 'New Residential' (See Amendments 5, 6, 56, 59, 60, 65 and 83 in Part 2);
5. Include new text within Section 4.1.1 of the Written Statement to refer to the preparation of a masterplan for employment land identified as Site 2 in the Employment SLA (See Amendment 16 in Part 2);
6. Insert a new masterplan objective under Section 4.4 of the Written Statement in respect of the employment land identified as Site 2 in the Employment SLA (See Amendment 18 in Part 2);
7. Amend Chapter 6 to better align the LAP with the measures identified in the LTP (See Amendments 31, 32, 33, 34, 35 and 36 in Part 2);
8. Amend Policy 6.2 relating to active travel measures (See Amendment 41 in Part 2);
9. Include new policy relating to public transport measures (See Amendment 42 in Part 2);
10. Include new policy relating to demand management and supporting measures (See Amendment 43 in Part 2);
11. Include new policy relating to traffic management and road measures (See Amendment 44 in Part 2);

12. Amend text under Section 6.4 to refer to the LTP in respect of the N24 Waterford to Cahir Road Scheme (See Amendment 38 in Part 2);
13. Amend heading and text under Section 10.2 (Monitoring and Evaluation) and insert new Local Planning and Development Implementation Plan (See Amendment 55 in Part 2).
14. The SFRA to be updated. Refer to response to OPW submission (submission no. 92, together with Amendments 77, 78, 79 and 80 in Part 2)

**Submission Number:**

112

**Submission Name:**

National Transport Authority (NTA)

**Submission Summary**

- i. The submission is supportive in principle of the approach being taken to the preparation of the Local Area Plan for Clonmel and, in particular, the manner in which Tipperary County Council has developed an evidence-based Local Transport Plan to accompany the Draft Local Area Plan, setting out a framework for transport investment in the settlement.
- ii. The submission is of the view that the Draft Local Area Plan provides a good basis for the future development of Clonmel, based on the integration of land use and transport planning.

iii. LAP & LTP Integration

The submission makes a number of recommendations which, in the view of the NTA, would serve to strengthen the integration of transport planning and land use planning in Clonmel and foster greater potential for sustainable transport use. There are also a number of recommendations which seek to provide greater clarity on some detailed matters.

These recommendations include:

- greater cross referencing between the LAP and LTP document;
- the inclusion in Chapter 6 of the LAP of greater detail on the proposed measures, with a particular emphasis on tabulated and graphically presented material;

- that Chapter 6 provide greater detail on the process of producing the LTP addressing the current lack of a link between the stated policies in Chapter 6 and proposed measures; and,
- that a statement be provided in the LAP document stating the role of the LTP development had on the preparation of the LAP.

The NTA expects that the development of public transport schemes along with connected networks for active travel will allow for the review of zoning objectives within the plan area.

iv. 6.3 Demand Management

The NTA would recommend that the LTP and LAP should include a commitment to the development of a town centre Parking Strategy, which would consider the potential for the migration of on-street car parking to sites on the town centre edge. Where feasible, parking facilities would be located on active travel routes to facilitate onward journeys by active modes, and should consider the provision of e-charging facilities. The NTA recommends that a policy regarding the provision of secure, public cycle parking at key destinations should be included in the final LAP and LTP. Such a policy should note that the implementation of cycle parking, particularly if provided as clusters, must take account of Universal Design principles to ensure that it does not discommode disabled pedestrians, wheelchair users, or pedestrians with visual impairments.

v. 6.4 Roads Strategy Policy 6.5 & 6.6

The draft LAP appears to confirm that the four-link road options form part of the preferred transport solution for the scheme. It is the NTA's understanding that as the public display of the preferred option is not anticipated before Q4 2023, as such this is considered to be premature. It is therefore recommended that Section 6.4 and Policy 6.5 are amended as appropriate and Policy 6.6, omitted from the LAP.

vi. Section 3.3 Future Demand for Travel

The NTA recommend that a graphical representation of the population and employment growth distribution used for the purposes of the LTP future year scenario would provide greater clarity on the assumed relationship between land use outcomes and associated future demand for travel.

vii. 6.3 Demand Management & LTP Section 6.5 (Maximum Parking Standards)

It is recommended that a greater emphasis is placed on the importance of parking at destination as a key influencing factor of mode choice, through both the managing of public parking in the town centre and other destinations and the manner in which the County Development Plan's maximum parking standards are applied for new developments.

viii. 6.2.4 Town Centre Public Realm and Active Travel Proposals

Given the critical importance of the quantum, function, location and access arrangements for parking in achieving the stated town centre objectives, including how the provision/management of parking for new development is determined, this section of the LTP would benefit from more detail on how the functions of parking, public transport, local traffic management, provision of walking / cycling and public realm improvements would be reconciled. If it is the intention that further details on the scale/location/management of off-street parking would be developed as the various town centre measures are implemented, it is recommended that the specific reference is made to this and that an outline of the process governing this approach is provided.

ix. 6.2.5 Connectivity to Future Zoned Land

In relation to the lands zoned for employment development ('Strategic Employment Site') to the north west of the town, the very large extent of lands, combined with a lack of specificity on the time frame, phasing or overall quantum of employment envisaged on these lands and associated trip demand/demand patterns, presents a high degree of uncertainty on how the proposed measures presented in the LTP would provide the basis for the sustainable development of this area for large scale employment development.

x. 6.4 Future Road Reservation

The submission states that there is no need to include specific measures for the road links at the Ballingarrane Business, Science and Technology Campus given forecast growth levels over the lifetime of this LTP. It is not clear if or to what extent employment growth is considered could be accommodated in advance of their completion and how this development would be served in manner which is consistent with the sustainable development objectives underpinning the LTP.

## **Consideration**

- i. The points made are noted and welcomed.
- ii. The points made are noted and welcomed.
- iii. See response to Recommendation 3 of the OPR Submission, and also Amendments 31, 32, 33, 34, 35, 36, 41, 42, 43 and 44 in Part 2.

- iv. Demand Management

Objective DM7 of the LTP supports the use of existing and potentially new car parks on the periphery of the town centre for Park and Stride facilities, to further enhance and safeguard the economic viability of the town and its sustainable development. As acknowledged within the LTP, the implementation of segregated cycle facilities within the town centre, in addition to public realm proposals, will result in the reallocation of road space and may result in the reduced level of on street parking within the town centre thereby further supporting the park and stride objective contained within the LTP. It is not considered that an additional parking strategy is required to support the implementation of the LTP.

The LTP recommends the provision of quality, secure cycle parking in Clonmel Town Centre and at other key locations in order to meet future demand. As noted by the NTA, a specific objective will be included in the LTP, to recommend high quality secure cycle parking at appropriate locations to be delivered in line with guidance set out within the National Cycle Manual.

- v. Section 6.4 Roads Strategy Policy 6.5 & 6.6

TCC is fully aware that the Preferred Transport Solution has yet to be decided. Policies 6.5 and 6.6 were not intended to be interpreted otherwise. As per TII submission response, it is recommended that Policy 6.5 be amended for clarity. See Amendment 39 in Part 2.

- vi. Section 3.3 Future Demand for Travel

In relation to the graphical representation of population and employment growth, the zoning maps in the LAP document (and also illustrated in the LTP) show the available lands which may be developed over the course of the LAP. The LTP provides a multi-modal access strategy for the development of all zoned lands. It is not considered

necessary to provide a further graphical representation of population and employment growth within the LAP or LTP.

vii. Section 6.3 Demand Management & LTP Section 6.5 (Parking Standards)

In relation to parking for new developments, and as per the response to submission no. 74, the LTP will be updated to include a specific Demand Management objective, noting that it is recommendation of the LTP that parking requirements for new developments will be in line with the standards set out within the County Development Plan with reduced levels of parking sought in highly accessible locations with good access to services and public transport opportunities. And that any proposal for reduced level of parking shall be accompanied by robust justification.

viii. Section 6.2.4 Town Centre Public Realm and Active Travel Proposals

Whilst the recommendations in relation to scale/location of additional off-street parking is noted, it is not feasible at this strategy level to spatially identify specific parking measures. The specific needs resulting from the development of a scheme can only be addressed through further detailed optioneering and design at the project level. Similarly, the mechanism by which this will be delivered can only be addressed on a case by case basis depending on a number of local influencing factors, the implementation strategy for individual schemes and the available funding for their implementation.

ix. Section 6.2.5 Connectivity to Future Zoned Land

In relation to the delivery of sustainable transport solutions to the northwest of Clonmel, the NTA's local bus services (CL9 and CL2), planned for delivery in 2023, will provide two services to the Ard Gaoithe Business Park and can be extended to include the Ballingarrane site as it is developed, helping to connect employees to existing residential areas and other public transport services in Clonmel. The LTP has identified a comprehensive active travel network which will connect into the Ballingarrane Strategic Business, Science and Technology Campus as illustrated in Figure 6-17 of the LTP. This includes strong radial active travel routes connecting to the town centre and residential areas including the Western Road, Glenconnor Road, Cashel Road, Fethard Road/Thomas Street and Davis Road. It is also an objective of the LTP that segregated cycle facilities are provided along and across the N24 around Clonmel creating a safe and attractive orbital connection from residential areas to key employers/attractions situated north and south of the corridor.

x. Section 6.4 Future Road Reservation

As noted in section 6.4, the delivery of employment lands to the northwest of Clonmel, is not contingent on the delivery of road schemes (R19 & R20). However, it is considered prudent to reserve the corridors should further development take place in the future beyond the levels within this 6-year LAP.

**Recommendation**

1. A specific objective will be included in the LTP, to recommend high quality secure cycle parking at appropriate locations to be delivered in line with guidance set out within the National Cycle Manual (see Recommendation 70 in Part 2)
2. The LTP will be updated to include a specific Demand Management objective, noting that parking requirements for new developments will be in line with the standards set out within the CDP with reduced levels of parking sought in highly accessible locations with good access to services and public transport opportunities, but that any proposal for reduced level of parking shall be accompanied by robust justification. (See Amendment 70 in Part 2)
3. Having regard to the submission made to the Draft Thurles LAP, it considered relevant to include a footnote to Section 1.2.1 of the Draft Clonmel LAP to highlight the fact that while the SEA accounts for all measures set out within the LAP boundary, it should be noted that the LTP (Appendix 2) includes measures outside the LAP boundary (See Amendment 2 in Part 2).

**Submission Number:**

53

**Submission Name:**

Transport Infrastructure Ireland (TII)

**Submission Summary**

The submission acknowledges the significant work undertaken in preparing and publishing the Local Area Plan which has incorporated a Local Transport Plan in Appendix 2 and, in combination, provide an integrated local sustainable planning and transport framework for Clonmel.



The submission identifies that numerous higher-level spatial plans, such as the NPF, RSES and Section 28 Guidelines include objectives relating to the maintenance of the strategic capacity and safety of the national roads network. National roads play a key role within Ireland's overall transport system and in the country's economic, social and physical development. The Draft Plan policies and objectives are required to maintain the strategic capacity and safety of the network of national roads.

The submission notes that the N24, national primary road, through the LTP area is an important strategic national road and provides important regional and inter-regional connectivity within and through the Southern Region, Tipperary, Clonmel and the Clonmel Environs. The route is an important strategic national road and gives access to regional and national markets and links with other strategic national roads providing onward connection to strategic airport and port locations with access to international markets.

The submission also notes that pending the delivery of the NDP N24 Waterford to Cahir Scheme, safeguarding the function and capacity of the existing N24 strategic route and the safety of all road users remains a critical consideration in accordance with Government policy.

A number of comments are included in relation to the Draft LAP as follows:

### **1. Development Strategy and National Roads**

TII welcomes that Section 6.5 of the Draft Local Area Plan and related Policy 6.8 reflect the foregoing provisions of official policy and identify the relevant policy, guidance and standards applicable to development proposed in the Local Area Plan impacting national roads.

### **2. Local Area Plan / Local Transport Plan Integration**

TII acknowledges and welcomes the focus on consolidation and compact growth that underpins the Draft Local Area Plan and the supporting Active Travel and Sustainable Transport Measures set out in the Draft Local Transport Plan.

TII welcomes that Section 6.5 of the Draft Local Area Plan confirms that proposals for new development on or affecting national roads within the LAP area, including the implementation of specific objectives in the LAP and Local Transport Plan, shall take account of the relevant TII Publications (Guidance and Standards) and notes that this requirement is also reflected in the LTP.

TII Recommendation:

*In the interests of clarity and in TII's opinion, although referenced elsewhere in the Draft Local Transport Plan, Table 2.1 would benefit from update to include reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).*

### **3. Specific Local Area Plan Objectives**

#### **i. Enhanced Regional Accessibility; N24 Waterford to Cahir Scheme**

TII notes and welcomes the inclusion of the NDP N24 Waterford to Cahir Scheme in Section 6.4 of the Draft Local Area Plan and associated policies and objectives.

Notwithstanding, there are a number of clarifications, in TII's opinion, required to the text of the Draft Local Area Plan in relation to the NDP N24 Waterford to Cahir Scheme, in the interests of consistency and to ensure that the Draft Plan reflects the up-to-date position of the Scheme development.

TII recommendation:

- *The Scheme should be referred to as the 'N24 Waterford to Cahir Scheme' in the interests of consistency and to ensure alignment with the National Development Plan objective.*
- *The Draft Plan appears to confirm that the 4 No. link road options form part of the Preferred Transport Solution for the scheme, this is premature as the Peer Review process has only just commenced and public display of the Preferred Option is not anticipated before mid-Q4, 2023. This is a concern.*
- *In the interests of safeguarding the investment in the NDP N24 Waterford to Cahir Scheme to date and providing for its future delivery, TII suggests the following wording amendment to Policy 6.5 of the Draft Plan:*  
  
*'Preserve the Study Area and Route Corridor Options, or, when it emerges, the corridor of the Preferred Option for the proposed N24 Waterford to Cahir Scheme (Major National Road Project)'.*
- *TII is concerned that proposed Policy 6.6 of the Draft Local Area Plan appears to provide that part of the NDP N24 Waterford to Cahir Scheme (i.e. the proposed link roads) may be delivered as part of new development. TII advise this is statement is*

*inaccurate. The statement is considered premature and could also potentially delay undermine the NDP N24 Waterford to Cahir Scheme Preferred Option. TII, therefore, recommends that proposed Policy 6.6 is reviewed and omitted from the Draft Local Area Plan.*

## **ii. Employment Lands at Ballingarrane**

The submission notes that Section 4.2 of the Draft LAP addresses Clonmel Strategic Employment sites and the strategic importance to the region of the Ballingarrane Business, Science and Technological Campus is evident. The Draft LAP confirms that the site is accessed from the N24 Cahir Road Roundabout.

The submission notes that the Council will be aware that direct access and intensification of direct access to a national road at a 100kph speed limit location, as in the case of the lands at Ballingarrane, conflict directly with the provisions of official policy. TII is not aware of any evidence base developed to address the requirements of the DoECLG Ministerial Guidelines by the planning authority. TII considers it critical that the foregoing official policy issues are addressed appropriately by the Council prior to finalising the Local Area Plan.

In addition, in TII's opinion, LTP measures should clearly align with the development of the strategic employment sites. TII is concerned that the matters of compliance with the 'Spatial Planning and National Roads Guidelines for Planning Authorities' have not been addressed in the LTP.

The submission notes that although not included in the Draft Local Area Plan, Section 6.4 of the Draft LTP indicates Future Road Reservations (Measures R19 & R20) in Table 6-05 and Figure 6-21 that combine to link the Ard Gaoithe Business Park (Cashel Road) to the N24 Cahir Road Roundabout. TII acknowledges that the Measures are not included in the Draft Local Area Plan but notes that the Draft LTP outlines that a corridor be retained to potentially support the future expansion of the Town beyond 2030. This potential future connection to the N24, national road, is at a roundabout location on the national primary road network where a 100kph speed limit applies.

### **TII Recommendation:**

- The Local Area Plan should be reviewed and updated to safeguard and to reflect the status of the N24 Waterford to Cahir Scheme and to account for liaison requirements with the N24 Project Team.*

- *In accordance with National Development Plan investment objectives, TII's priorities also relate to safeguarding the levels of safety and capacity of the existing strategic national road network in the area.*
- *Any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII and be developed, subject to an appropriate evidence base, in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012) and the requirements of TII Publications.*
- *TII is not aware of any evidence base developed to support the identification of the Strategic Employment Site at Ballingarrane to address the requirements of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). It is considered critical that this issue is addressed by the Council prior to finalising the Local Area Plan.*
- *Section 6.4 of the Draft Local Transport Plan, Future Road Reservations (Measures R19 & R20) in Table 6-05 and Figure 6-21 that combine to link the Ard Gaoithe Business Park (Cashel Road) to the N24 Cahir Road Roundabout should be reviewed cognisant of policy and safety requirements in accordance with official policy set out in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Such confirmation should be reflected in the Draft LTP prior to finalisation.*

#### **4. Maintaining the Strategic Capacity and Safety of the National Road Network**

TII requests that the Council give due consideration to reflecting the requirements of Section 3 of the DoECLG Spatial Planning and National Roads Guidelines in the Local Area Plan prior to finalisation, in particular:

##### **i. TII Publications (Standards) and Road Safety**

TII Recommendation:

- *The Council is requested to reference TII Publications and the requirement for RSA in the Draft Local Area Plan relating to development proposals with implications for the national road network.*

## **ii. TII Traffic and Transport Assessment (TTA)**

TII Recommendation:

- *The Council is requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Local Area Plan relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.*

## **iii. Signage**

TII Recommendation:

- *TII welcomes that Objective 6F of the Draft Local Area Plan sets out the Council objective to control the proliferation of non-road traffic signage on and adjacent to national roads and recommends reference to the DoECLG Guidelines in the Objective in addition to TII's Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011).*

## **iv. Safeguarding national road drainage regimes**

TII Recommendation:

- *Having regard to the extensive national road network in Tipperary, TII would welcome consideration of a new Objective included in the Local Area Plan outlining that;  
  
'The capacity and efficiency of the national road network drainage regimes in Tipperary will be safeguarded for national road drainage purposes.*

## **v. Renewable Energy and Grid Connection**

TII Recommendation:

- *TII would welcome consideration being given to including an objective in the Local Area Plan, in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection cable routing should seek to utilise available alternatives, as opposed to being placed along the strategic national road network contrary to the provisions of official policy*

## **vi. Noise**

TII Recommendation:

- *The Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Local Area Plan.*

#### **vii. Other Matters**

In relation to Greenway proposals, consultation with the Councils own internal project and/or design staff is recommended.

#### **Consideration**

Comments are addressed as they appear in the summary section above:

1. The point made here is noted and welcomed.
2. The draft LTP measures have been developed at a strategic level in accordance with national and regional policies. Any specific projects taken forward for implementation along national roads will be required to follow all TII guidelines and publications including the requirement for a Design Report as noted in the submission.

A reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) will be included in Table 2.1 of the draft LTP.

3. Specific Local Area Plan Objectives
  - i. Enhanced Regional Accessibility; N24 Waterford to Cahir Scheme
    - *The Scheme should be referred to as the 'N24 Waterford to Cahir Scheme' in the interests of consistency and to ensure alignment with the National Development Plan objective.*

This comment is accepted and will be actioned.

- *The Draft Plan appears to confirm that the 4 No. link road options form part of the Preferred Transport Solution for the scheme, this is premature as the Peer Review process has only just commenced and public display of the Preferred Option is not anticipated before mid-Q4, 2023. This is a concern.*

TCC is fully aware that the Preferred Transport Solution has yet to be decided. Policies 6.5 and 6.6 were not intended to be interpreted otherwise.

- *In the interests of safeguarding the investment in the NDP N24 Waterford to Cahir Scheme to date and providing for its future delivery, TII suggests the following wording amendment to Policy 6.5 of the Draft Plan:*

*'Preserve the Study Area and Route Corridor Options, or, when it emerges, the corridor of the Preferred Option for the proposed N24 Waterford to Cahir Scheme (Major National Road Project)'*

This comment is accepted. Text under Section 6.4 can be amended for clarity and Policy 6.5 amended as per TII's recommendation.

- *TII is concerned that proposed Policy 6.6 of the Draft Local Area Plan appears to provide that part of the NDP N24 Waterford to Cahir Scheme (i.e. the proposed link roads) may be delivered as part of new development. TII advise this is statement is inaccurate. The statement is considered premature and could also potentially delay undermine the NDP N24 Waterford to Cahir Scheme Preferred Option. TII, therefore, recommends that proposed Policy 6.6 is reviewed and omitted from the Draft Local Area Plan.*

This comment is accepted and will be actioned.

## ii. Employment Lands at Ballingarrane

- *The Local Area Plan should be reviewed and updated to safeguard and to reflect the status of the N24 Waterford to Cahir Scheme and to account for liaison requirements with the N24 Project Team.*

*In accordance with National Development Plan investment objectives, TII's priorities also relate to safeguarding the levels of safety and capacity of the existing strategic national road network in the area.*

*Any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII and be developed, subject to an appropriate evidence base, in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012) and the requirements of TII Publications.*

Section 6.2.5 of the LTP details sustainable transport and active travel measures supporting the strategic employment site in Clonmel, noting that the majority of this network currently exists at Ballingarrane and adjoining the lands. The LTP

has identified a comprehensive active travel network which will connect into the Ballingarrane Strategic Business, Science and Technology Campus as illustrated in Figure 6-17 of the LTP. This includes strong radial active travel routes connecting to the town centre and residential areas including the Western Road, Glenconnor Road, Cashel Road, Fethard Road/Thomas Street and Davis Road. It is also an objective of the LTP that segregated cycle facilities are provided along and across the N24 around Clonmel creating a safe and attractive orbital connection from residential areas to key employers/attractions situated north and south of the corridor.

One of the proposed town bus services (CL9) will run adjacent to the lands at Ballingarrane and can be amended to directly serve the employment sites as they are developed.

There is also a recommendation in Section 6.2.5 of the LTP that through the planning process, proposed future developments will be required to prioritise active travel infrastructure integrated with the wider active travel network to ensure future residents/employees are provided with a choice of sustainable transport modes.

- *TII is not aware of any evidence base developed to support the identification of the Strategic Employment Site at Ballingarrane to address the requirements of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). It is considered critical that this issue is addressed by the Council prior to finalising the Local Area Plan.*

In respect of the Ballingarrane lands, the following is noted:

- In 2001 South Tipperary County Council purchased the Ballingarrane Estate, c. 121ha, on the north-west of Clonmel. It was purchased in order to secure the long-term strategic expansion of the town, with particular regard to its economic position within South Tipperary and the South East region;
- The overall estate comprises 121 hectares, of which c. 96 hectares are in the ownership of Tipperary County Council, 21 hectares are owned by IDA Ireland (purchased in 2007) and the remaining 4 hectares are lands to the north in private ownership;



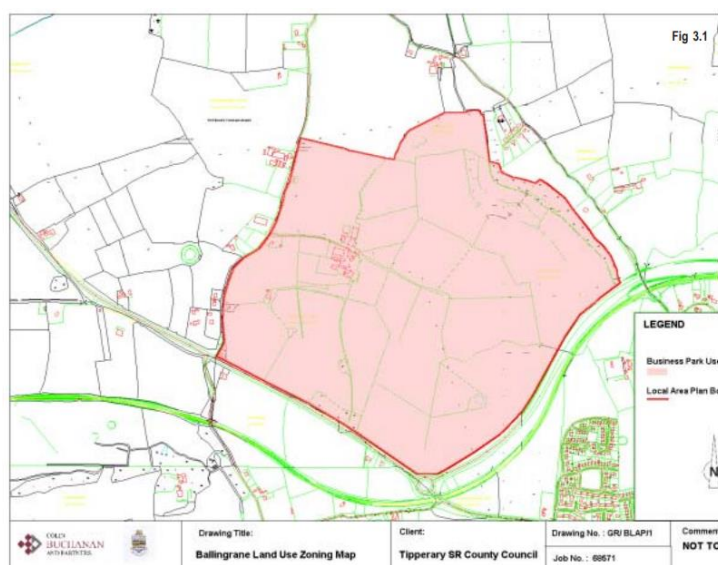
- An LAP was prepared for the lands in 2003, identifying the Ballingarrane lands for 'Business Park Use'. Policy TP2 required access to the land to be provided via the existing Cahir Road roundabout, which was to be upgraded to NRA standards;
- The Cahir Road Roundabout was upgraded in 2007, including the construction of the access arm to the Ballingarrane masterplan lands, comprising a 7.5m wide access road with public lighting, footpaths, cycle lanes and internal distributor roundabout;
- All consecutive plans for the town, including at a regional level the Southern RSES, have continued to identify the strategic importance of this landbank for employment use;
- Since the 2013 Town Development Plan, development of the Questum Acceleration Centre, the Incubation Support Unit and other subsequent development has reduced the remaining available employment zoned lands to 105 hectares in the Draft LAP;
- IDA Ireland made a submission to the draft Clonmel LAP 2024-2030, strongly supporting the identification of Ballingarrane lands as a 'Strategic Employment Site', making the following points:
  - In 2023 there were 154 IDA Ireland supported companies in the Mid-west region directly employing 26,004 people and generating indirect employment of 20,803 persons;
  - The Mid-west region is now recognised as a global cluster location of choice for advanced manufacturing including both life science and semiconductor manufacturing multinationals;
  - Within this region County Tipperary is home to some of the world's largest pharmaceutical, biosciences, manufacturing and financial services sectors, including Abbott Vascular and Boston Scientific in Clonmel and MSD in Ballydine;
  - Fundamental to maximising the impact of FDI in the region and to ensuring the continued significant large-scale investment is the availability of sufficient zoned, serviced and accessible land in strategic locations. This is the principal factor that will continue to establish the Mid-west and Clonmel as a compelling location option for multinationals in the mobile FDI marketplace;

- Using the NPF population to jobs ratio of 1.6, population growth targets for Clonmel equates to a requirement for an additional 3,214 jobs by 2031. This represents a 50% increase in the 2016 employment figures or an almost doubling of the existing FDI employment in the town;
- In this context IDA Ireland consider that most future FDI client development will be focused on the Ard Gaoithe Business Park and the Ballingarrane Masterplan Area (site ref 1 and 2) which account for 237 hectares of the residual 303 hectares of zoned lands;
- IDA Ireland strongly supports the Council's designation of the Ballingarrane Masterplan Area as Strategic Employment Site in the Draft LAP.

The following is a chronological overview of the history of the Ballingarrane lands in terms of zoning and policy.

### **Ballingarrane LAP 2003**

The LAP was prepared for the Ballingarrane masterplan lands. Under the LAP the land was zoned '*Business Park Use*'.



The LAP contained the following policy objectives:

**SP3** *Employment and research functions will be at the clean industry/high amenity end of the market and may include further strengthening of the healthcare and pharmaceutical clustering, which is a strength of the Clonmel area. Uses which require external outdoor storage, low quality architectural buildings or produce extensive*

*airborne emissions will not be considered favourably for this site and will be directed to the industrial reserves already zoned within Clonmel.*

**SP4** *Uses on the site will be restricted to those which match the profile of such a high amenity location, and lend themselves easily to integration within a campus style layout. They will be assessed in terms of their compatibility and complementarity to the high environmental qualities of the site. Targeted uses will include education, research, employment and community functions.*

**TP2** *The principle means of access to the site will be via the existing roundabout at the junction of the by-pass and the Toberaheena Road to the town centre. The design and realignment of this junction, to facilitate access to the subject lands shall be in accordance with NRA standards.*

### **Integrated Urban Strategy for Clonmel 2003**

Refers to the Ballingarrane lands as follows:

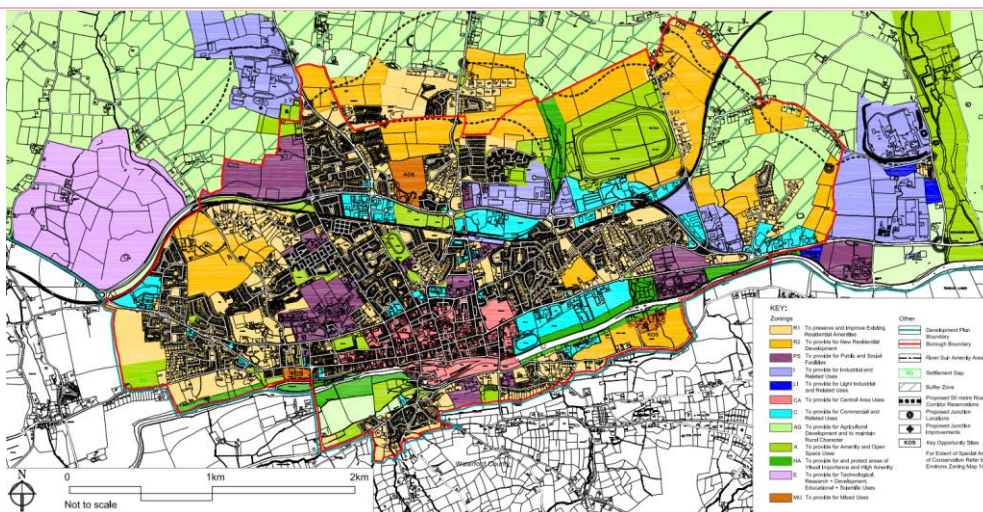
*South Tipperary County Council purchased Ballingarrane House and 120 ha of land to the north west of the town and adopted a Local Area Plan (LAP) for the lands in 2003. The LAP seeks the development of a business park in a manner that facilitates and encourages planned, coordinated and appropriate sustainable development throughout the Estate. The LAP will, therefore, provide for the long-term strategic expansion of the town with particular regard to its economic position in the South East Region and South Tipperary.*

### **IDA Investment**

In 2007, IDA, the agency responsible for the attraction and retention of inward foreign direct investment (FDI) into Ireland, purchased 21 ha of the masterplan lands.

### **Clonmel and Environs Development Plan 2008**

Under the 2008 Plan the land was zoned '*E – To provide for Technological, Research & Development, Educational & Scientific Uses*'



Clonmel and Environs Development Plan 2008

BOROUGH ZONING MAP 1B

**Policy ECON.5: Ballingarrane** The Council will continue to promote the development of Ballingarrane as the premier Science and Technology Campus in South Tipperary, in accordance with the strategy set out in the Ballingarrane LAP (2003).

## Regional Planning Guidelines for the South-East Region 2010-2022

### Investment in Infrastructure

List of major infrastructure projects completed 2004-2010, including

- M8 from Cashel south to Cork County Boundary
- M8 from Cashel north to North Tipperary County Boundary and then on to Kilkenny County Boundary
- Broadband MANs in Clonmel, Carrick-on-Suir, Cashel, Cahir and Tipperary Town
- A portal website [www.southtipperary.ie](http://www.southtipperary.ie) promoting industry and living in South Tipperary
- Postgraduate Research Centre established in TI Clonmel campus
- **Ballingarrane Science and Technology Park development progressing with the provision of infrastructure (including broadband, access roads, footpaths and**

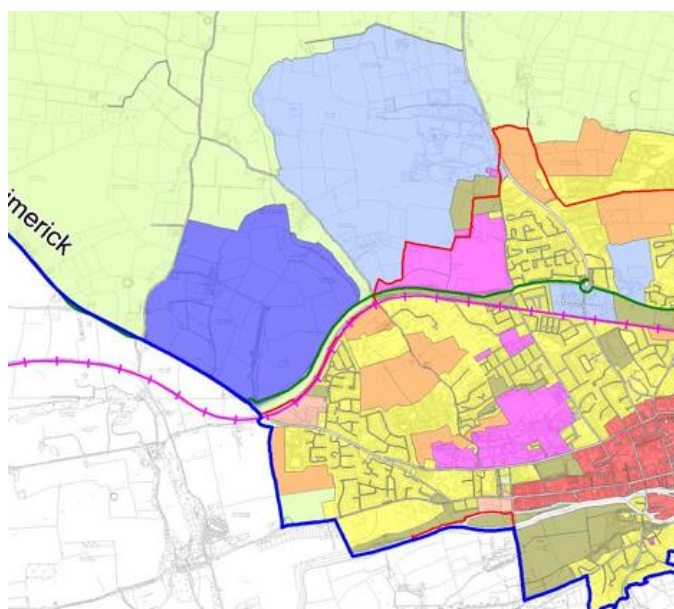
public lighting), the purchase of 50 acres by the IDA and the agreement to relocate TI Clonmel campus to the Park

- Significant building programme completed in South Tipperary General Hospital in Clonmel

**PPO 4.9** It is an objective of the Regional Authority to strengthen and enhance the R&D (Research and Development) capability in the region by maximising the synergies between third and fourth -level institutions and industry. To this end the Regional Authority supports the relocation and expansion of the Tipperary Institute Clonmel Campus from its current location to the Tipperary Science and Technology Park at Ballingarrane.

### **Clonmel and Environs Development Plan 2013**

Under the 2013 Plan the land is zoned 'Strategic Employment'



#### **Policy ECON 1: Ballingarrane Business, Science & Technology Campus**

It is the policy of the Council to facilitate and provide for the sustainable development of strategic enterprise, knowledge intensive industry, technology based industry and large scale employers in the Ballingarrane Business, Science & Technology Campus and to encourage the provision of Research and Development/Innovation facilities to support enterprise and employment at this location. The Council will continue to work with existing and future strategic partners to deliver the Park as a driver of sustainable economic growth in Clonmel, the County and the Region.

## Southern Regional Spatial and Economic Strategy (RSES)

### Attributes

- Strategic location on the Waterford-Limerick N24 and rail corridors with onward inter-regional linkages to Mid-West and South-West;
- Good access to Cork, Dublin, Shannon and Waterford Airports;
- Good international connectivity with direct access routes to the Ports of Waterford and Rosslare to the east and Limerick-Foynes and Port of Cork to the west/south-west;
- Key support role of Clonmel to Waterford;
- Major employment centre with total jobs of 7,306 in 2016, including 3,500 FDI jobs and diverse employment sectors including Pharma, Life sciences and Food;
- Strategic employment land banks including Ballingarrane Park;
- Centre for Higher Education at the LIT Clonmel Campus;
- Retail centre for the surrounding towns and hinterland area;
- Tourist centre for Ireland's Ancient East and Munster Vales located on the River Suir Blueway and close to attractive upland and mountain scenery in the Knockmealdown Mountains;
- Recreational assets of the River Suir Blueway and surrounding mountains;

- Important Regional Centre for Healthcare with South Tipperary General Hospital and St. Luke's Psychiatric Hospital located in the town.

### Key Infrastructural Requirements

- i. Need to upgrade the N24 linking Limerick and Waterford to enhance east /west connectivity, which will be of benefit to Clonmel as a regional town;
- ii. Investment in infrastructure on the Limerick-Waterford rail line to enable increased line speeds and frequency of services;
- iii. Enhanced provision of bus services to enable improved inter-regional connectivity;
- iv. Transport measures through a Local Transport Plan including continued investment enhancing sustainable transport modes, particularly walking and cycling in the town;
- v. Urban regeneration funding package to develop a 4.5ha town centre site (Kickham Barracks) to enhance the Main Street area;
- vi. Economic funding package for the further development of Ballingarrane Park as a strategic employment location for Clonmel;
- vii. Delivery of planned new water treatment plant to boost water supply for the town.

## RPO 17

### Clonmel

- 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.

### **Ballingarrane Masterplan 2019**

In 2019, Tipperary County Council produced the 'Ballingarrane Masterplan' for these lands. The purpose of the Masterplan is to set out the vision and physical framework for the development of the Masterplan lands and provide a blueprint as to how this vision can be achieved. The Masterplan will be used by the Planning Authority to assess planning applications and by developers and stakeholders to guide future development.

The Masterplan outlines the following vision and principles for the lands:

- To establish a framework for the sustainable development of Ballingarrane as a Strategic Business, Science and Technology Campus.
- To cater for the full spectrum of organisation size – from start-ups and spin outs, second stage funded companies through to the largest multinational organisations.
- To provide for a high quality inspiring and human scale environment underpinned by the existing natural and built heritage of the estate.

Masterplan sets out the vision and physical framework for the development of the Masterplan lands in order to provide certainty to prospective occupants, and includes development guidelines and precinct guidelines.

As noted in the Draft LAP, while the masterplan lands are fully serviced, water supply issues in the town is an issue. Uisce Éireann has confirmed that it is currently carrying out hydrogeological studies to increase the capacity of the Monroe Wellfields, North of Clonmel. It is anticipated that the project will include an improved water supply to the Ballingarrane lands.

Furthermore, Section 6.2.5 and Figure 6-17 of the LTP identifies a comprehensive active travel network which will connect into the Ballingarrane Strategic Business, Science and Technology Campus. This includes strong radial active travel routes connecting to the town centre and residential areas including the Western Road, Glenconnor Road, Cashel Road, Fethard Road/Thomas Street and Davis Road. It is also an objective of the LTP that segregated cycle facilities are provided along and across the N24 around Clonmel creating a safe and attractive orbital connection from residential areas to key employers/attractions situated north and south of the corridor.

Investment in this regard is justified by the strategic importance of the lands to the town and region.

- *Section 6.4 of the Draft Local Transport Plan, Future Road Reservations (Measures R19 & R20) in Table 6- 05 and Figure 6-21 that combine to link the Ard Gaoithe Business Park (Cashel Road) to the N24 Cahir Road Roundabout should be reviewed cognisant of policy and safety requirements in accordance with official policy set out in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Such confirmation should be reflected in the Draft LTP prior to finalisation.*

As noted in the submission, the LTP does not recommend the delivery of these link roads in the lifetime of this plan. However, that the corridor be retained to potentially support the future expansion of the Town beyond 2030. If the proposed roads are identified as a requirement post 2030, they would need to be reviewed cognisant of policy and safety requirements in accordance with official policy set out in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Text will be added to Section 6.4 of the LTP to strengthen wording around this point.

#### 4. Maintaining the Strategic Capacity and Safety of the National Road Network

TII requests that the Council give due consideration to reflecting the requirements of Section 3 of the DoECLG Spatial Planning and National Roads Guidelines in the Local Area Plan prior to finalisation, in particular:

##### **i. TII Publications (Standards) and Road Safety**

**TII Recommendation:**

- *The Council is requested to reference TII Publications and the requirement for RSA in the Draft Local Area Plan relating to development proposals with implications for the national road network.*

The requirement for a Road Safety Audit is provide for under Section 6.3 of Volume 3 (Development Management Guidelines) of the TCDP 2022-2028.



## **ii. TII Traffic and Transport Assessment (TTA)**

TII Recommendation:

- *The Council is requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Local Area Plan relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.*

The requirement for a Traffic and Transport Assessment is provide for under Section 6.2 of Volume 3 (Development Management Guidelines) of the TCDP 2022-2028.

## **iii. Signage**

TII Recommendation:

- *TII welcomes that Objective 6F of the Draft Local Area Plan sets out the Council objective to control the proliferation of non-road traffic signage on and adjacent to national roads and recommends reference to DoECLG's Spatial Planning and National Roads Guidelines (2012) in the Objective in addition to TII's Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011).*

This amendment is accepted.

## **iv. Safeguarding national road drainage regimes**

TII Recommendation:

- *Having regard to the extensive national road network in Tipperary, TII would welcome consideration of a new Objective included in the Local Area Plan outlining that; 'The capacity and efficiency of the national road network drainage regimes in Tipperary will be safeguarded for national road drainage purposes.'*

Policy 12-8 of the TCDP 2022-2028 provides for the safeguarding of national road drainage purposes, these provisions apply to the LAP also.

## **v. Renewable Energy and Grid Connection**

TII Recommendation:

- *TII would welcome consideration being given to including an objective in the Local Area Plan, in relation to renewable energy and in relation to safeguarding the national road*

*network, indicating that grid connection cable routing should seek to utilise available alternatives, as opposed to being placed along the strategic national road network contrary to the provisions of official policy.*

This is considered acceptable.

#### **vi. Noise**

TII Recommendation:

- *The Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Local Area Plan.*

Section 11.8 Noise and Emissions of the TCDP outlines the provisions of the Tipperary Noise Action Plan which has been informed by the Environmental Noise Regulations 2006.

#### **vii. Other Matters**

The point made in respect of consultation with the Councils own internal project and/or design staff on Greenway proposals, is noted.

### **Recommendation**

It is recommended that the following amendments to the Draft LTP are made:

1. Table 2.1 of the LTP updated to include a reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) (See Amendment 68 in Part 2)
2. Amend the Written Statement to ensure consistency in referencing the 'N24 Waterford to Cahir Scheme' and clarity on the 4no. road links (See Amendment 37 in Part 2)
3. Amend Policy 6.5 of the Written Statement (See Amendment 39 in Part 2)
4. Amend text under Section 6.4 of the Written Statement to clarify the position regarding the 4no. road links (See Amendment 37 in Part 2)
5. Omit Policy 6.6 (See Amendment 40 in Part 2)
6. Text will be added to the "Future Road Reservation" section of the LTP to reference the fact that should the proposed roads be identified as a requirement they would need to be reviewed cognisant of policy and safety requirements in accordance with official policy

set out in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) (See Amendment 69 in Part 2).

7. Amend Objective 6F in Section 6.6 regarding road signage (See Amendment 46 in Part 2)
8. Include new policy under Section 8.6 regarding grid connection routing for renewable energy developments (See Amendment 47 in Part 2)

**Submission Number:**

52

**Submission Name:**

Department of Transport (DoT)

**Submission Summary**

- i. Since the previous LAP there have been important policy developments relevant to accessible, integrated and sustainable public transport which should be reflected in the proposed plan. Namely, sections 3.4: ‘Public Realm and Wayfinding’, 5.3: ‘Open Spaces and Amenities’, 5.5: ‘Age Friendly Town’, and section 6.2: ‘Public Transport’, should include material on UNCRPD, Universal Design, Whole Journey Approach, and to make specific reference to the ‘Design Manual for Urban Roads and Streets interim note’.
- ii. Accessible public transport for all, and especially for Persons with Disabilities, Reduced mobility and Older People.
  - The “whole of Government” National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities i.e. including for dishing of footpaths and accessible infrastructure. The submission welcomes Objective 5J ‘*Work with Age Friendly in implementing the strategies and objectives of Tipperary Age Friendly Strategy*’.
  - The UN Convention on the Rights of Persons with Disabilities (UNCRPD) ratified by Ireland in 2018 puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas.
  - DMURS Interim advice Note 2020 includes guidance on accessibility – references to DMURS 2019 in the Draft LAP should be updated with reference to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.

- To make public transport fully accessible to people with disabilities requires a 'whole journey approach'. This refers to all elements that constitute a journey. Local Authorities should implement a universal design approach to the built environment'.
- The Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity throughout the country.

The submission notes that the DoT can assist with appropriate text in the development plan regarding integrated, accessible public transport.

### **Consideration**

One of the overarching objectives for the LAP is that it is concise, non-technical, user friendly, and does not repeat policy or information that is available elsewhere. With this in mind, it is not intended to replicate information and policies included and available elsewhere. Policy 6.3 of the Draft LAP refers to the Design Manual for Urban Roads and Streets (DoT, 2019) and supplementary Advice Notes; while Policy 12-1 of the Tipperary County Development Plan 2022-2028 refers to the 'whole journey approach' and the Design Manual for Urban Roads and Streets Interim Advice Note – Covid-19 Pandemic Response (2020).

Nonetheless, it is accepted that further reference to the 'whole journey' approach should be included within the Draft LAP.

### **Recommendation**

It is recommended that the following amendments to the Draft LAP are made:

1. Include new text at Section 6.1 of the Written Statement to refer to the whole journey approach and Policy 12-1 of the Tipperary County Development Plan 2022-2028 (See Amendment 30 in Part 2).

<b>Submission Number:</b> 92.	<b>Submission Name:</b> Office of Public Works (OPW)
<b>Submission Summary</b> The following points are made in the submission: <ul style="list-style-type: none"><li>i. <u>General:</u> The submission welcomes the acknowledgement of the Planning System and Flood Risk Management Guidelines (2009) and preparation of a Strategic Flood Risk Assessment (SFRA). The submission particular welcomes the commitment in the Draft LAP to managing flood risk (Policy 8.5) and the provisions of Policy 8.4 and Objective 8C of integrating SuDS and nature-based solutions into development proposals.</li><li>ii. <u>Flood Zones</u> The submission notes that flood zones are defined ignoring the presence of flood defences and the flood zones in the Draft LAP are underestimated as they have excluded areas benefitting from flood defences. The submission recommends flood zones and zoning be reviewed in this context  The submission identifies a proposed new residential zoning (lands west of Brook Crescent, Old Bridge) on lands within Flood Zone B and recommends same is rezoned as less vulnerable or water compatible development, unless it can be demonstrated that the Plan Making Justification Test has been satisfied.</li><li>iii. The submission recommends that the 1% AEP extents on the National Indicative Fluvial Mapping should be used in addition to the 0.1% to inform flood zone mapping.</li><li>iv. <u>Justification Test-</u> The submission welcomes Plan Making Justification. Regarding same the submission recommends that a discussion of residual risks should be included for lands considered to benefit from the flood relief scheme.</li><li>v. <u>Regeneration Site 11-Suir Island Gardens-</u>Confirmation is sought on whether the lands located at the north western part of Site 11 are within the defended area and how residual risks will be managed. Where outside the defended area a discussion on proposed mitigation measures is sought.</li><li>vi. <u>Regeneration Site-</u> There are sites identified in Appendix 3 that are located in areas that benefit from the existing flood relief scheme or are located in 0.1% AEP National CFRAM extent that require site-specific flood risk assessments. This requirement is not stated for all such sites.</li></ul>	

- vii. Town Environs-The submission welcomes the Note on Land Use Zoning Objectives and Matrix in the Draft LAP and considers same will ensure inappropriate development will not be permitted in zoning such as own Environs where a Justification Test would not be appropriate.
- viii. Flood Relief Scheme-Consideration to b given to including a register of key flood risk infrastructure in the Local Area Plan where it would not otherwise be readily identified or protected from interference or removal.
- ix. Consideration of Climate Change Impacts-The submission notes that future scenario mapping for the National CFRAM Study has not been overlaid on land use zoning maps.  
  
The submission welcomes the climate change considerations of the Draft LAP, in particular Policy 8.5 d).  
  
The submission recommends that recommend that the SFRA refer to the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019 and the guidance on potential future scenarios contained therein.
- x. Nature-based Solutions and SuDS-The submission welcome Policy 8.4 and Objective 8C that relates to Nature Based sustainable drainage and the SuDS techniques outlined in Section 3.5 of the SFRA. The submission notes that the applicability of different drainage techniques for key development sites may be considered using integrated or areas-based approaches to avoid reliance on site by site solutions.
- xi. Past Flood Events-The Selection of Historical Indicators Map in the SFRA to be reviewed to ensure all past flood events have been considered.
- xii. Errata- The submission recommends that **www.floodinfo.ie** be referenced instead of **www.cfram.ie** in Table 3 of the SFRA.

### Consideration

- i. Noted.
- ii. The OPW's CFRAMS Flood Extent GIS layers that were supplied and have informed the Draft Plan's SFRA Flood Zone GIS layers appear to take into account the presence of flood defences.

The OPW's CFRAMS Flood Extents shown on the PDFs available on the OPW's website appear to ignore the presence of flood defences.

The Draft Plan's SFRA Flood Zone GIS layers need to be updated to reflect the requirement to ignore the presence of flood defences.

The OPW's CFRAMS Flood Extents shown on the PDFs, as well as the Defended Areas, have been requested from the OPW to this effect.

Accordingly, the Plan's SFRA Flood Zone GIS layers showing Flood Zones at the Defended Areas will be updated to Flood Zone A and B as appropriate. These layers will be used to provide updated Flood Zones to facilitate amendment to relevant Draft Plan and SFRA maps.

The Justification Test in the SFRA will also be updated to take account of updated overlaps between land use zoning and Flood Zones.

- iii. The submission states that "Only the 0.1% AEP extents for the National Indicative Fluvial Mapping Programme have been considered when producing the Flood Zones."

This is not the case, both 1% AEP and 0.1% AEP were used to define Flood Zone B as, following the site visit, the NIFM 1% AEP was considered to be an overestimation. However, Flood Zone A was intended to comprise the channel of the Clonmel Stream and the mapping will be updated to take this into account (the channel is currently classified as Flood Zone B).

There will be no need to amend the Plan apart from making amendments relating to flood zones overlain on maps.

- iv. Noted.

- v. Regeneration Site - 11. Suir Island Gardens to be subject to Justification Test.

It is also considered appropriate to include reference to Section 2.2.5 'Emergency Response Planning' in Volume 3 (Development Management Standards) of the Tipperary County Development Plan 2022-2028.

- vi. Noted. To note that planning applications for all relevant regeneration sites, including those located in areas that benefit from the existing flood relief scheme or are located in 0.1% AEP National CFRAM extents, require site-specific flood risk assessments.

vii. Noted.

viii. Noted. To add the following text to Draft Plan Section 8.5 Flood Risk Management as follows:

*To also contribute towards the protection of key flood risk infrastructure, including the Clonmel Flood Defence Scheme, from interference or removal.*

ix. Noted. The reference to the 2009 OPW Draft Guidance included in the SFRA is from the County Development Plan and it is not within the scope of this process to amend it. However, reference to the more recent Climate Change Sectoral Adaptation is also provided in the County Development Plan and has been provided in both the Draft Local Area Plan and accompanying SFRA.

x. Noted. As detailed in Section 3.5 of the SFRA “Sustainable Drainage Systems and Surface Water Guidance and Strategy”:

*“...Each land use zoning objective allows for a range of possible uses and the Local Area Plan, and associated County Development Plan, allow for a range of scales, heights, densities configurations/layouts and designs. The application of different SuDS techniques will be dependent on a combination of the site's characteristics and the development (when known) being considered.*

*Because of the infinite range of land use types and associated developments and designs that could occur on sites within the Plan area under this type of Plan<sup>1</sup>, the guidance from this SFRA is to consider the full range of SUDs available, taking into account the recommendations and information provided above and below. On key development sites, in particular, such as the regeneration sites, integrated and area-based provision of SuDS and green infrastructure may be appropriate in order to avoid reliance on individual site by site solutions...”*

It is recommended that Policy 8.4 in the Draft LAP is amended to refer to Section 3.5 of the SFRA.

xi. Noted. It is recommended that a new map is added to Appendix II of the SFRA showing the flood events locations from floodinfo.

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<sup>1</sup> Refer to Plan “Table 9.2: Zoning Matrix”, for example, for the wide range of land uses possible at sites zoned with single land use zoning objectives.



- xii. Noted. To update the reference in the SFRA to the OPW's website from [www.cfram.ie](http://www.cfram.ie) to [www.floodinfo.ie](http://www.floodinfo.ie)

## **Recommendation**

### Flood Zones

1. Update the Draft LAP SFRA Flood Zone map in the Draft LAP (Section 8.5) and SFRA document (See Amendment 51, 77 and 87 in Part 2)
2. The Justification Test in the SFRA to be updated to include an updated excerpt from the Land Use Zoning/Flood Zones overlay. (See Amendment 78 in Part 2)
3. To amend Policy 8.5 regarding residual risks in defended areas (See Amendment 52 in Part 2)
4. Include Defended Areas in the SFRA Maps. (See Amendment 77 in Part 2)
5. Include Defended Areas in the LAP Maps. (See Amendment 51 and 87 in Part 2)
6. To add text to Section 2.2 of the SFRA (See Amendment 79 in Part 2)
7. To update the Draft Plan's SFRA Flood Zone mapping in the Draft Plan and SFRA document to reclassify the channel as Flood Zone A (currently classified as Flood Zone B) along the Clonmel Stream (See Amendment 77 and 87 in Part 2)

### Regeneration Sites

8. Add a new bullet point to the Key Planning Considerations for Site 11 (in Appendix 3 to the Draft LAP) to refer to Section 2.2.5 'Emergency Response Planning' in Volume 3 (Development Management Standards) of the Tipperary County Development Plan 2022-2028 (See Amendment 73 in Part 2).
9. Add new paragraph of text after the second paragraph under Section 3.2 of the Draft LAP to refer to the requirement for site-specific flood risk assessments (See Amendment 13 in Part 2)

### Flood Relief Scheme

10. Add new text to Section 8.5 of the Draft LAP relating to flood risk infrastructure (See Amendment 50 in Part 2).

Climate Change

11. To overlay available CFRAM potential future scenario mapping on the land use maps and include in the Plan or SFRA (See Amendment 77 and 87 in Part 2)

Nature-based Solutions and SuDS

12. Amend Policy 8.4 in the Draft LAP to refer to Section 3.5 of the SFRA (See Amendment 53 in Part 2).

Past Flood Event

13. Add a new map Appendix II of the SFRA showing the flood events locations from floodinfo (See Amendment 77 in Part 2)

Errata

14. Update the reference in the SFRA to the OPW's website from [www.cfram.ie](http://www.cfram.ie) to [www.floodinfo.ie](http://www.floodinfo.ie) (See Amendment 80 in Part 2)

<b>Submission Number:</b>	<b>Submission Name:</b>
4	Environmental Protection Agency

**Submission Summary**

- i. We acknowledge your notice, dated 28th July 2023, in relation to the Draft Clonmel Local Area Plan 2024 - 2030 (the 'Plan') and SEA Environmental Report.

The EPA is one of the statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via the guidance document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources'.

This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. We suggest that you take this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the Plan.

Tipperary County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.

ii. Content of the Environmental Report

The SEA Regulations set out the information to be contained in an Environmental Report.

iii. Assessment of Alternatives

You should describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative. You should assess the alternatives against the 'Strategic Environmental Objectives' identified in the SEA ER.

iv. Assessment of Environmental Effects

You should assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.

v. Mitigation Measures

Where you have identified the potential for likely significant effects, you should provide appropriate mitigation measures to avoid or minimise these. You should ensure that the Plan includes clear commitments to implement the mitigation measures.

vi. Monitoring

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.

If the monitoring identifies adverse impacts during the implementation of the Plan, Tipperary County Council should ensure that suitable and effective remedial action is taken.

Guidance on SEA-related monitoring is available on the EPA website at <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

vii. State of the Environment Report – Ireland's Environment 2020

In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our State of the Environment Report Ireland's Environment – An Integrated Assessment 2020 (EPA, 2020) should be considered, as relevant and appropriate. This should also be taken into account in preparing the Plan and SEA.

viii. Future Amendments to the Plan

You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.

ix. SEA Statement – “Information on the Decision”

Once the Plan is adopted, you should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

x. Environmental Authorities

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
  - Minister for Housing, Local Government and Heritage;
  - Minister for Environment, Climate and Communications; and
  - Minister for Agriculture, Food and the Marine.
  - any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.
- xi. If you have any queries or need further information in relation to this submission, please contact me directly. I would be grateful if you could send an email confirming receipt of this submission to: [sea@epa.ie](mailto:sea@epa.ie)

**Consideration**

- i. The 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been considered in the preparation of this SEA Scoping Report and will be kept on file for reference throughout the SEA process.

The SEA will seek to ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region.

- ii. Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the Regulations.
- iii. Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under "Assessment of Alternatives" - refer to Sections 6 and 7 of the SEA Environmental Report.
- iv. Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission

under “Assessment of Environmental Effects” - refer to Sections 7 and 8 of the SEA Environmental Report.

- v. Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under “Mitigation Measures” - refer to Sections 8 and 9 of the SEA Environmental Report. The Plan mitigation measures have been integrated into the Plan.
- vi. Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under “Monitoring Measures” - refer to Section 10 of the SEA Environmental Report. The Plan mitigation measures have been integrated into the Plan.
- vii. The recommendations, key issues and challenges described in the EPA's State of the Environment Report – Ireland's Environment 2020 have been taken into account during the preparation of the Plan and undertaking of the SEA.
- viii. Any future amendments will be screened for likely significant effects as required.
- ix. An SEA Statement will be prepared including the required information and taking into account the EPA guidance on SEA Statements.
- x. The relevant environmental authorities have been consulted with as part of the Plan preparation/SEA process.
- xi. Noted.

### **Recommendation**

No alterations recommended to the Draft LAP.

<b>Submission Number:</b>	<b>Submission Name:</b>
94	Uisce Eireann (UE)

### **Submission Summary**

The following points are made in the submission:

- i. Sustainable Urban Drainage and Green-Blue infrastructure- The submission welcomes the policies and objectives on use of SUDS systems and Green-Blue Infrastructure in development.

The submission notes the above measures can provide a sustainable and cost-effective measure of managing storm water and pollution and in keeping storm water out of combined sewers, which is particularly encouraged in order to maximise capacity of foul collection systems. Discharge of additional surface water to combined systems is not permitted.

The submission outlines that Uisce Eireann (UE) would be happy to collaborate on projects that would remove surface waters from combined sewers and nature-based rainwater management initiatives.

- ii. Planned Road and Public Realm Projects- The submission notes the potential for road and public realm projects may impact on UE assets and the submission recommends early engagement regarding such projects to ensure UE services are protected and disruption to same minimised. The submission requests that development in the vicinity of UE assets must be in accordance with their Standard Details and Codes of Practice and that Diversion Agreements will be required where a UE asset needs to be diverted or altered.

- iii. Zoning - The submission notes network extensions may be required to service some zoned sites and network upgrades may also be required where sewers are 150mm or less and watermains are 80mm or less. Any upgrades shall be developer driven unless UE projects are in place to progress such works.

Proposals to connect to UE Network will be assessed on a case by case basis in accordance with UE New Connections process. Connections will be subject to the UE Connections Charging Policy.

Third party agreement will be required where new development is to be serviced via private property/private infrastructure. This may apply to Residential Sites 12, 14 and 15, 21 and 28 and Employment Sites 2, 5 and 10 (see Serviced Land Assessments).

Existing watermains and sewers to be protected where they run through sites. Where assets need to altered or diverted, a diversion agreement may be required.

Future development of lands close to the WWTP must take account of the established use of the WWTP and potential for expansion of same. Residential Site 25 noted as being in close proximity to the WWTP with potential to be impacted by noise and odour.

The submission recommends phased sequential development in areas with existing water services infrastructure and spare capacity.

- iv. Water Services Infrastructure and Constraints (Water) - The submission notes there is limited water supply capacity in Clonmel, upgrades are required and are being progressed to cater for the projected LAP growth. A project to expand Monroe Well-field is being progressed with programmed completion date of Q4, 2026.

The submission notes the status of the Draft South East Regional Water Resources Plan, which includes Clonmel, will allow Uisce Éireann to review water supply needs collectively for the entire South East Region.

Uisce Éireann is carrying out a full network review and hydraulic modelling to determine if there are any major network constraints and to identify any strategic network upgrades required to provide sufficient capacity in the town out to 2030 and beyond. Uisce Éireann and Tipperary County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities.

- v. Water Services Infrastructure and Constraints (Wastewater) - The submission notes there is sufficient wastewater capacity to cater for the growth projected in the LAP.

A Drainage Area Plan is planned for Clonmel and will determine the capital upgrades required to cater for growth. Local network upgrades will be required in some areas.

Uisce Éireann and Tipperary County Council are continually progressing sewer rehabilitation activities, capital maintenance activities.

- vi. Other Comments:

- Chapter 3, Section 3.1- Uisce Éireann supports the preparation of masterplans for proposed developments. As part of the master-planning process, consideration should be given to how sites will be serviced as well as the potential impacts on Uisce Éireann infrastructure and projects.



- Chapter 8, Section 8.2- The submission proposes an amendment to the 2nd paragraph of Section 8.2.2 (Clonmel Public Wastewater System) to reflect the date of the latest Wastewater Capacity Register.
- vii. UE Capital Investment Plan- Uisce Éireann's Investment Plan is the budgetary plan for the five-year period from 2020 to 2024 inclusive. Preparation for the next Investment Plan period, 2025 to 2029, is currently underway.

### **Consideration**

The points made in the submission will be addressed in the order in which they are presented:

- i. Sustainable Drainage and Green-Blue Infrastructure - The points made in the submission are noted and welcomed. The recommendations of Uisce Eireann regarding management of surface waters and the discharge of same to foul sewers is noted and are accounted for under Section 8.3 of the Draft LAP. The comments in the submission regarding the promotion of nature based sustainable urban drainage measures is acknowledged, as is the offer from UE to engage and collaborate on projects that remove surface water from combined sewers.
- ii. Planned Road and Public Realm Projects- The requirement for early engagement with UE in advance of planning public realm and road projects that have potential to impact on UE assets and disrupt services is noted. This requirement can be addressed at project level.
- iii. Zoning - The points made regarding the possible requirement for network extensions and localised service upgrades to service some zoned sites are noted as are the recommendations for phased sequential development. Section 8.2.1 and Section 8.2.2 of the Draft LAP notes the requirement for upgrades to the water and wastewater network. Policy 6.4 of the Draft LAP supports the sequential development of land.

The requirement for 3rd party agreement where accessing UE services is through private lands as is the requirement to protected UE assets. The point that all new development will be assessed through UE's New Connections Process and that new connections are subject to UE's Connections Charging policy is noted.

The Draft LAP recognises the strategic function of the Clonmel WWTP and the need to safeguard same. Policy 8.6 of the Draft LAP has been included to this end. Any

development proposals for residential on lands near to the WWTP must take account of its function and potential for intensification of use or expansion.

- iv. Water Services Infrastructure and Constraints (Water) - The points made regarding water supply capacity and wastewater capacity to cater for the projected growth within the lifetime of the Draft LAP is noted, as are the measures to address water supply constraints. The Draft LAP notes the need for upgrades to the water supply to cater for the projected growth envisaged under the LAP.

It is acknowledged that ongoing mains rehabilitation, leakage reduction and removal of surface water from the foul network should serve to improve service capacity.

- v. Water Services Infrastructure and Constraints (Wastewater) – The points made regarding a Drainage Area Plan and sewer rehabilitation activities are noted.

- vi. Other Comments -

The point made regarding Section 3.1 of Chapter 3 is captured under Section 8.2 which requires that *in considering new development proposals and in developing masterplans for specific sites and lands as required under the LAP consideration shall be given to:*

- *The servicing of adjoining sites/ development lands (where feasible); and*
- *The protection / diversion of existing Uisce Éireann infrastructure and maintenance of services.*

Section 8.2.2 can be amended to reflect the latest Wastewater Capacity Register.

- vii. UE Capital Investment Plan - The preparation of the UE Capital Investment Plan 2025-2029 is noted.

## **Recommendation**

It is recommended that the following amendments to the Draft LAP are made:

1. Section 8.2.2 to be amended to reflect the publication date of the latest Wastewater Capacity Register. (See Amendment 49 in Part 2).

<b>Submission Number:</b> 88	<b>Submission Name:</b> <b>Department of Environment, Climate and Communications</b>
<b>Submission Summary</b> <p>The submission requests that points made in the submission is taken into consideration when drafting the Clonmel LAP:</p> <ol style="list-style-type: none"><li>i. <u>Climate Action</u>-The submission welcomes reference to the Climate Action Plan (CAP) 2023 and requests that the LAP is drafted in a manner consistent with the CAP. The submission notes and support the inclusions of actions from the CAP 2023 and TCDP, in particular compact growth and sustainable mobility and sustainable transport measures (Section 2.2) and the support to reduce car dependency and promotion of active travel and public transport (Policy 6.1).</li><li>ii. <u>Renewables</u>- The submission welcomes and supports the transition to renewable energy, in particular Section 8.1 Energy Demand and Renewable Energy and Policy 8.1. The LAP should have regard to updated renewable energy targets under the CAP 2023.</li><li>iii. <u>Built Environment and Heating</u>- The submission notes and supports Policy 2.1 (retrofitting of existing structures), Policy 2.3 (low-carbon and energy efficiency), Objective 2A (reduce energy consumption, produce renewable energy) and Section 8.1 Energy Demand and Renewable Energy. The submission encourages further consideration with regard to the energy efficiency of existing residential buildings and notes the provisions of the CAP 2023 for electrification of heating under the National Residential Retrofit Plan.</li><li>iv. <u>District Heating</u>- The submission welcomes and supports the compact growth provisions of the Draft LAP (Section 2.4.3 and Policy 3.1) and opportunity from compact growth to develop district heating networks. The submissions notes provisions of the NPF and RSES for the South Region as they relate to district heating. The submission requests more explicit policies in support of district heating are included in the final LAP and encourages the potential of district heating from waste heat to be examined.</li><li>v. <u>Telecommunications</u>-The Draft LAP should support national policy objectives in terms of digitalisation, 5G rollout and enhancing Ireland's national and international</li></ol>	

connectivity. The submission requests that ducting inventories be published and a streamlined process to allow for easy connectivity be developed.

- vi. Waste and the Circular Economy- The submission welcomes and supports Objective 8E (sustainable management of waste). The submission recommends consultation with the Regional Waste Management Planning Office regarding development of the final LAP. The submission references the provisions of the *“Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects”* and requests that same be incorporated into the policies of the LAP.

### **Consideration**

The points made in the submission will be addressed in the order in which they are presented.

- i) Climate Action- The Draft LAP has been prepared in a manner consistent with the National Climate Action Plan (CAP). Reference to the alignment between the Draft LAP and the CAP is clearly set out under Section 2.2 of the Draft LAP. The submission notes the Draft LAP includes actions from the CAP.
- ii) Renewables-The points made in the submission regarding renewables is noted, as is the reference to energy targets under the CAP.
- iii) Built Environment and Heating- The points made regarding further consideration with regard to the energy efficiency of existing residential buildings is noted. In this regard an additional line can be added to Objective 2H to reference the electrification of heating under the National Residential Retrofit Plan.
- iv) District Heating - Section 5.1 of the Draft LAP recognises the potential for district heating (as part of a local renewable energy system) to become a feature of towns such as Clonmel. Section 8.1 supports the transition to renewable energy (generated locally) for heating and transport. Policy 8.1 supports the use of renewable energy technologies at appropriate scales and Objective 2A supports measures and actions to reduce energy consumption, produce renewable energy from local resources and to adapt to a changing climate, in accordance with the Tipperary Climate Action Plan 2023 (when complete).
- v) Telecommunications-Section 5.6 and Objective 5M of the Draft LAP set out the policy context on telecommunications infrastructure. Section 5.6 cross references Policy 6-6 of the TCDP. The content of the Draft LAP regarding Telecommunications is considered adequate.

- vi) Waste and the Circular Economy- The points made regarding Objective 8E are noted and welcomed. There is no statutory requirement to consult with a Regional Waste Management Planning Office as part of the preparation of a LAP.

Section 8.4 of the Draft LAP sets out an objective of the Council to support the sustainable management of waste and the reduction in the production of waste in Clonmel in line with the National Waste Management Plan for a Circular Economy (Government of Ireland, 2022) and associated guidance across the delivery of its services and in the management of new development. The referenced to associated guidance addresses the submission requirements.

### **Recommendation**

It is recommended that the following is undertaken:

1. Objective 2H is amended to reference electrification of heating under the National Residential Retrofit Plan. (See Amendment 8 in Part 2).

<b>Submission Number:</b>	<b>Submission Name:</b>
61	Department of Education (DoE)

### **Submission Summary**

The submission makes the following points:

- i. Having regard to the population growth for Clonmel of 5,142 persons between 2016 and 2031 as identified in the Draft LAP and TCDP 2022-2028, together with the published Census 2022 figure of 18,369, the Department determines that the potential projected growth figure from 2023 to 2031 for Clonmel stands at 3,913 persons.
- ii. The submission noted that there are 12 schools (7 primary, 5 post-primary) in Clonmel.

#### Primary Schools

- iii. The Department has assessed that if the projected growth for Clonmel materialises, it will put pressure on existing primary school facilities to accommodate the demand for extra school places.

- iv. The preference of the Department is that the requirement for additional school places is met through expanding the existing facilities, where possible.
- v. The Department requests the Council to examine the potential of protecting a land buffer around each of the primary schools in Clonmel.
- vi. Presently, the Department cannot state that there is a definite requirement for a new future primary school, however the Department requests the Council to consider zoning an appropriate site for a primary school should such a requirement materialise in the future.

#### Post-Primary Schools

- vii. The Departments requests a change of text under 'Adequacy of existing school places' (p54), to reflect the departments position that *'the level of projected increased requirements is such that it is anticipated that the existing facilities (or expansion thereof) would meet the potential requirements arising from the increased population'*.

#### Other Comments

- viii. The Department also notes that the school place requirements for primary schools has changed to 10.25% of the population, whilst remaining the same for secondary schools (7.5%). The submission also notes that the teacher pupil ratio for 2023/24 school year is 23:1 for primary schools. The Department requests that the LAP is updated accordingly.
- ix. The Department notes and welcomes the fact that the Draft LAP identifies the existing schools and where practical, has applied a land use zoning to enable expansion. The provision of land zoned 'Community Services and Infrastructure' northwest of the junction of the N24 /Heywood Road is noted.
- x. The Department notes and supports Policy 5.5, Objective 5G, Objective 5H and the active travel measures supporting Safe Routes to School in Appendix 2.
- xi. The submission comments that unforeseen circumstances, such as the Ukrainian crisis, may necessitate the reassessment of school place provision and notes that additional special education provision will be required at both primary and post-primary throughout the country.
- xii. The Department welcomes continued engagement with the council regarding the development of both new and existing schools.

### **Consideration**

The Department's preference that demand for additional school places arising from the growth as envisaged under the Draft LAP is accommodated by expansion of existing school facilities is noted.

The Draft LAP has applied an appropriate zoning to lands on and surrounding the schools within the Draft LAP area to enable future school expansion should the demand for same arise. This zoning will accommodate expansion to meet demand arising from envisaged population growth and growth from unforeseen circumstances, should the latter arise. In addition, land northwest of the N24/Heywood Rd junction have been zoned 'Community, Services and Infrastructure' and these lands could accommodate development of a new school should the demand for same arise.

Section 5.4.1 of the Draft LAP can be revised to account for the figures outlined in the submission and to clarify that the Department regularly reviews its assessment criteria for school places using a variety of data sources.

The commentary regarding Policy 5.5, Objective 5G and Objective 5H of the Draft LAP and Section 6.2.1 and Section 7.2 of the Local Transport Plan are noted and welcomed.

The potential for future accommodation needs to accommodate special education is noted. As stated the Draft LAP has applied an appropriate zoning to lands on and surrounding the schools within the Draft LAP area to enable expansion should the demand for same arise.

### **Recommendation**

It is recommended that the following is undertaken:

1. Amend the footnote to Section 5.4.1 of the Draft LAP to update the current student place requirement rates and primary school student teacher ratio (See Amendment 24 in Part 2);
2. Amend Objective 5G to delete reference to a specific land-use zone (See Amendment 26 in Part 2).

<b>Submission Number:</b> 96	<b>Submission Name:</b> Electricity Supply Board (ESB)
<b>Submission Summary</b> <p>The points made in the submission by ESB are summarised as follows:</p> <ul style="list-style-type: none"><li>i. ESB Networks provides an essential service building and maintaining the electricity networks in Clonmel and throughout Co. Tipperary.</li><li>ii. The ESB Depot at Old Waterford Road, Clonmel is required to support the delivery by ESB of capital works programmes and operational activities in an energy efficient and cost-effective manner where key performance targets and emergency response times can be delivered. Good access to the main road networks and areas of potential growth is essential to provide an economic service and to meet emergency response times for Clonmel and its environs.</li><li>iii. ESB notes the proposed land-use zoning of Urban Core on its lands at Old Waterford Road, Clonmel and highlights that the Clonmel engineering depot will be required for the foreseeable future to accommodate services of strategic national importance to the national grid and to potentially facilitate the reinforcement of the energy infrastructure to increase electricity capacity in Clonmel to meet future electricity demand growth.</li><li>iv. ESB would welcome opportunities to future proof delivery of electricity infrastructure through greater collaboration between ESB and Local Authorities.</li><li>v. ESB supports the ambition of the Draft Plan to deliver an overarching land use strategy for the proper planning and sustainable development of Clonmel.</li></ul>	
<b>Consideration</b> <p>The points made in the submission are noted.</p> <p>The 'Urban Core' zoning objective for the ESB lands located on the eastern side of the Old Waterford Road in Clonmel will be maintained.</p>	



The requirement for early engagement with ESB regarding public infrastructure projects that will be undertaken within the LAP area is acknowledged. This requirement can be addressed at early stages of project design.

### Recommendation

No alterations recommended to the Draft LAP.

Submission Number:	Submission Name:
118	Department of Housing, Local Government and Heritage

### Submission Summary

- i. The Department welcomes the opportunity to comment on the Draft LAP. The Department notes that there are no specific objectives/policies within section 7.3 relating to archaeology or Clonmel's underwater archaeological heritage associated with the River Suir – upon which the town was founded. The Department notes the absence of archaeological heritage related policies and objectives and requests that the Council considers strengthening as follows:
- ii. It is important that the LAP is informed by a clear understanding of the nature of archaeology and archaeological heritage and the legislation that underpins them. While both have been described in detail in the SEA it is recommended that a brief statement should be included in Section 7.2 Archaeology:

*Archaeology is the study of past societies through their material remains and the evidence of their environment. It is not restricted solely to ancient periods; it includes the study of relatively recent societies through, for example, industrial and military sites.*

*The archaeological heritage is comprised of all material remains of past societies with the potential to add to our knowledge of such societies. It therefore includes the remains of features such as settlements, monuments, burials, ships and boats and portable objects of all kinds, from the everyday to the very special. It also includes evidence of the environment in which those societies lived.*

*Archaeological heritage occurs in all environments, urban and rural, upland and lowland, grassland, tillage and forestry, inland and coastal, dryland, wetland (including peatlands) and underwater (including watercourses, lakes and the sea).*

*Archaeological heritage may exist in the form of upstanding or visible remains, or as subsurface features with no surface presentation. Given the above, archaeological heritage is present as yet unidentified in all environments.*

- iii. The SEA includes a reference to 'national monuments' in its archaeology map when the legal term is 'recorded monument', except for Clonmel Courthouse which is a National Monument in the ownership of the State. The mapping (Figure 4.15 and 4.16) is poor in distinguishing the ZAP around the historic town, it is recommended that a standalone map is included which highlights all recorded monuments, ZAPs, national monuments and wrecks. The wreck records for the relevant planning area could also be included. The submission draws attention to provisions relating to the protection of archaeology set out in, the Planning and Development Act, The Environmental Impact Assessment Directive, the International Conventions, and the Framework and principles for the Protection of Archaeological Heritage.
- iv. It is recommended that at the outset Section 7.2 should include an over-arching objective for the protection of the archaeological heritage, this objective should ideally relate to the TCDPs archaeological heritage objectives.
- v. A number of further archaeological policies and objectives are outlined in the submission with the aim of strengthening the LAPs priorities for archaeology.
- vi. Further suggested policies and objectives relating to climate change and archaeological heritage.

### **Consideration**

Noted. These issues are already covered by the existing planning framework, including existing legislation and the existing County Development Plan.

The Draft Local Area Plan and associated Tipperary County Development Plan include various provisions that contribute towards the appropriate protection of the environment, including archaeological heritage.

Commentary will be provided through Screening for SEA and AA, and full assessments as necessary, if specific proposed material alterations emerge as a result of this submission.

The LAP mapping includes a standalone Built Heritage map detailing the ACAs and recorded monuments in the LAP area. The point regarding the mis-labelling of recorded monuments as national monuments is noted and actioned.

### Recommendation

It is recommended that the following amendments to the Draft LAP are made:

1. Amend the Built Heritage Map with the label 'Recorded / National Monument' in place of 'National Monument' (See Amendment 88 in Part 2)

<b>Submission Number:</b>	<b>Submission Name:</b>
90	David Kelly, Southern Regional Assembly

### Submission Summary

The following points are made in the submission:

- i. Role of Clonmel as a Key Town- The submission notes and welcomes the recognition of the role of Clonmel as a Key Town (as set out in the RSES) throughout the Draft Plan.
- ii. Town Centre First Approach and Compact Growth- The submission welcomes the inclusion of the specific chapter on Town Centre Strategy (Chapter 3) and associated strategy statement. The success of the Council in attracting funding such as the URDF to develop this framework is noted. The inclusion of Appendix 3: Regeneration Site is welcomed as is the preparation of a Town Centre First Action Plan. The submission commends the public realm enhancement schemes, wayfinding projects and adoption of the 10 Minute town Concept. The submission cites the importance that sites close or within the town centre as developed in line with the principles outlined in RPO 31 and 34 of the RSES.

The submission notes the quantum of land zoned New Residential at 96.04ha (which is additional to Urban Core, Mixed Use and Regeneration land use zones) and the requirement for 85.3 ha of lands. The submission states the amount of lands zoned should be in line with the amount required and clarification is sought on this point.

The submission notes that a residential density of 25 dph is applied to lands where residential use is permitted and recommends that higher density targets should be considered particularly for sites within the town centre and close to public transport services.

- iii. Economic Development and Enterprise Strategy- The submission 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, the support for Tourism initiatives such as Flights of Discovery! and proposals to develop an educational campus at Kickham Barracks.

Regarding the extent and location of lands zoned Employment the submission notes the importance that sites close to the town centre are prioritised, so that same can be accessed by active travel means or public transport.

- iv. Sustainable Transport and Mobility-The submission welcomes the preparation of a Local Transport Plan and welcomes the preferred strategy in same. The submission notes the LAP recognition of the strategic location of Clonmel on the Waterford-Limerick road and rail corridor.
- v. Climate Action and Sustainability- The submission 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. The submission also welcomes the requirements for public spaces to be well-designed and universally accessible.
- vi. Environmental Assessment-The submission notes the preparation of SEA, AA and SFRA reports alongside the Draft LAP and recommends that the environmental reports prepared for the RSES are reviewed.

### **Consideration**

The points made in the submission will be addressed in the order in which they are presented.

- i. Role of Clonmel as a Key Town- The point made is noted and welcomed.
- ii. Town Centre First Approach and Compact Growth- The positive comments regarding the Draft LAPs growth and development strategy are noted and welcomed.

The following factors has influenced the quantum of lands zoned that can accommodate new residential development:

- The TCDP 2022 Core Strategy Framework, adjusted to account for the LAP timeline.
- Section 4.4.3 of the Development Plans- Guidelines for Planning Authorities (DHLGH, 2022) which states that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded.
- Section 4.4.1 of the above referenced Guidelines which state *that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning.*

- iii. Economic Development and Enterprise Strategy- The points made regarding the economic development strategy are noted and welcomed.

Regarding the location and extent of land zoned Employment the Draft LAP has considered the location of existing employment sites, supporting infrastructure such as water services and roads, Clonmel's designation as a 'Self-Sustaining Regional Growth Driver', the principle of compact growth and a Town Centre First approach in allocating land use zoning for employment. Section 4.1.1 of the Draft LAP and Policy 4.1 seeks to direct new development that generate high densities of employment to The Urban Core, Mixed Use or Regeneration lands where they can be easily accessed and served by existing/planned active travel measures. In addition, development is required under Section 6.4 of the Draft LAP to take place sequentially and local transport measures are integrated into the development of lands.

- iv. Sustainable Transport and Mobility-The points made regarding the Local Transport Plan and Clonmel's strategic location on the Waterford-Limerick road rail corridor are noted.
- v. Climate Action and Sustainability- The points made regarding the Draft Plan provisions on climate action and sustainability are noted and welcomed.
- vi. Environmental Assessment- The points made regarding statutory environmental assessments and the content of environmental assessment undertaken as part of the RSES preparation are noted.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

104

**Submission Name:**

HW Planning, for IDA Ireland

**Submission Summary**

- i. This submission is made in respect of the employment land provision in general and specifically in relation to the masterplan lands for the Ballingarrane Strategic Business, Science and Technology Campus;
- ii. IDA Ireland welcomes the Council's approach to planning for economic growth in the Draft LAP, which identifies Clonmel as one of the key strategic population and employment growth locations in the county;
- iii. The NPF set ambitious population and jobs targets for the Southern Region of 340,000 – 380,000 additional people and 225,000 additional jobs by 2040 (NPO 1b and 1c). The NPF Revision process is underway which will include an assessment of implementation to-date. In order to deliver upon these ambitious targets, it is imperative that sufficient and appropriate employment zoned lands are made available in the short-term;
- iv. The Southern RSES recognises Clonmel as a Major Employment Centre with a total jobs number of 7,306 in 2016, including 3,500 FDI jobs and diverse employment sectors including Pharma, Life sciences and Food;
- v. The RSES specifically recognises the Strategic Employment Land Bank at Ballingarrane Park, and identifies a key requirement for an economic funding package to support its further development;
- vi. Availability of sufficient zoned is the principal factor that will continue to establish the Mid-west and Clonmel as a compelling location option for multinationals in the mobile FDI marketplace;

- vii. IDA commends the detailed research undertaken by the Council in the LAP Appendix 1 - Serviced Land Assessment (SLA) and Appendix 2 - Local Transport Plan (LTA) to underpin the policies of the Draft LAP;
- viii. IDA Ireland strongly supports the Council's designation of the Ballingarrane Masterplan Area as Strategic Employment Site in the Draft LAP;
- ix. IDA note the statement on page 12 of the SLA: 'No additional areas have been identified for employment use in Clonmel'.
- x. IDA Ireland would like to request clarification from the Council in relation to the employment zoned land figures as those cited in the table on page 4 and Section 3.2 of the SLA includes zoning for 361 hectares of employment lands and 132 hectares of general industrial zoned lands, combining to form a total of 493 hectares of total employment zoned lands. This appears to contradict the total available employment zoned lands figure set out in the tables in Section 3.1 and on page 12 of the SLA, which combines to 303 hectares.
- xi. IDA Ireland therefore requests that:
  - the introduction of the proposed Town Bus route CL9 and CL1 be prioritized, the proposed frequency of the CL9 service be reviewed, and any detail design proposal ensure that bus stop provision is made for the Ballingarrane Masterplan Area along the CL9 route.
  - The proposed cycle path upgrades as proposed along Cashel Road (AT 56), Cahir Road (AT 43 and AT 54) and Glenconnor Road (AT 83) be prioritised to support the modal shift to sustainable travel of the future employees within the masterplan area.
- xii. IDA Ireland strongly supports the Strategic Employment Site designation at the Ballingarrane Masterplan Area in the Draft LAP as an essential landbank to accommodate projected employment growth.
- xiii. In line with Section 8.3.2 of the CDP, IDA Ireland would also like to commit to working in partnership with the Council on capacity building in Clonmel and its Environs, in an on-going basis, to identify further suitable lands required to accommodate large-scale FDI development as and when the need arises.

## **Consideration**

- i. This point is noted and welcomed.
- ii. This point is noted and welcomed.
- iii. This point is noted.
- iv. This point is noted.
- v. This point is noted.
- vi. This point is noted.
- vii. This point is noted and welcomed.
- viii. This point is noted and welcomed.
- ix. The note included beneath Table 2 acknowledges that compared to the current town development plan, no additional land has been zoned 'Employment'. However, referring to the response to submissions 77 and 95 (See Amendment 84 in Part 2) it is recommended that further greenfield land, within the built-up area of the town, is zoned 'Employment', so this note, referred to by the IDA, can be removed from beneath Table 2 in the SLA.
- x. Section 3.1 of the SLA relates to the zonings as they stand under the current Clonmel and Environs Development Plan 2013, showing that 'available' employment land is 303ha. This covers 4 zoning types –
  - Commercial (10.31ha)
  - Light Industry & Employment (146.64ha)
  - Strategic Employment (106.45ha)
  - General Industry (40.14ha)

Section 3.2 of the SLA relates to the Draft LAP and refers to Table 2 at the end of the SLA for figures on 'Available' land, with these figures broke down as follows:

- Employment (145.74ha)
- Employment - Strategic Employment Site (104.93ha)
- General Industry (40.22ha)

The slight discrepancy in the figure for 'available' Employment zoned land in the Draft LAP compared to 'available' Light Industry & Employment zoned land in the current town development plan is due to the fact that the Commercial zone has not been used in the



Draft LAP, and 4.86ha of land currently zoned Commercial has been rezoned Employment in the draft LAP (with Amendment 84 proposing a change to 'Mixed Use').

For consistency and transparency, it is recommended that the figures in the table under Section 3.1 be amended to align with Table 2, and also to add a new table under Section 3.2 outlining 'available' land under the draft LAP map.

It is further recommended that table numbers in the SLA be rationalised to make the document more reader friendly.

xi. In response to the requests made in respect of the town bus and active travel measures:

- The town bus services in Clonmel are due for implementation in late 2023/early 2024. The demand for the bus service will be monitored periodically, and improvements made to the frequency and routing as necessary as the demand arises. The need for bus stop provision can be incorporated into the Ballingarrane Masterplan Area. The town bus service is being rolled out by the NTA in conjunction with Tipperary County Council.
- In relation to the active travel measures along Cashel Rd, Cahir Rd and Glenconnor Rd, the importance of these schemes to provide sustainable travel options for employees within the masterplan area is noted. The implementation plan within the LTP highlights the delivery of key active travel schemes in the short term. These will be progressed by Tipperary County Council subject to funding.

xii. This point is noted and welcomed.

xiii. This point is noted and welcomed.

### **Recommendation**

It is recommended that the following amendments to the Draft LAP are made:

1. Remove the note from beneath Table 2 in the SLA, contained in Appendix 1 to the draft LAP (See Amendment 67 in Part 2)
2. Amend the figures in the table under Section 3.1 of the SLA to make it consistent with Table 2 (See Amendment 62 in Part 2)
3. Amend text, add text and insert a new table in Section 3.2 (See Amendment 63 in Part 2)
4. Rationalise table numbers (See Amendments 56, 57 and 60 in Part 2)

<b>Submission Number:</b> 60	<b>Submission Name:</b> RMLA Planning, for An Post
<b>Submission Summary</b> <p>An Post own and operate a retail and mail centre at Emmet Street, Clonmel, and provide an essential public service. The submission requests that Tipperary County Council provide a supportive policy framework in the Clonmel LAP for the future provision of postal infrastructure.</p> <p><u>Clonmel Town Centre / LTP</u></p> <ol style="list-style-type: none"><li>i. Town Centre First - An Post is supportive of the Clonmel Regeneration Plan for the town in line with Policy 3.5 of the Draft LAP, and Objective 3G: <i>Support delivery of the Clonmel Public Realm Enhancement project.</i></li><li>ii. Local Transport Plan - An Post is supportive of the LTP for the Town in line with Policy 6.2 of the Draft LAP, and Objective 6A: <i>Actively seek funding for investment in active travel and public transport in the town in line with the provisions of the LTP as outlined in Appendix 2 (and any review thereof).</i></li></ol> <p><u>Access</u></p> <ol style="list-style-type: none"><li>iii. Requests that the specific operational requirements regarding access (including HGV movement) and deliveries to postal facilities, including post boxes and collection points, which are located in town centre areas are recognised including:<ul style="list-style-type: none"><li>• 24-hour access for deliveries/collections to/from An Post facilities</li><li>• protection of customer access</li><li>• sufficient loading bay space provided</li></ul></li><li>iv. Requests Tipperary County Council to engage with An Post should any future area plan propose to amend delivery hours in town centre locations and during the preparation of any future public realm and movement strategies.</li></ol> <p><u>Zoning</u></p>	

The submission states that it is important that appropriate zoning objectives are included as part of the Local Area Plan to allow for the enhancement of existing facilities and the development of new postal infrastructure.

- v. The submission requests that Tipperary County Council include a specific land use classification for postal facilities in the new Local Area Plan as outlined below:

**Postal Facilities:** *A building which facilitates mail services that can include the processing, sortation and distribution of mail.*

The submission also suggests the inclusion of a note associated with the specific land use classification to read: *This use can be assessed on a case by case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan.*

- vi. The submission requests that under the zoning matrix in the LAP 'Postal Facilities' is considered either 'Permissible in Principle' or 'Open for Consideration' across all zoning objectives.

- vii. The submission requests the inclusion of the following policies which, the submission indicates, would assist greatly in the delivery of future An Post projects in the Town:

*"To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the Town."*

*"To facilitate the provision of postal infrastructure at suitable locations in the Town."*

*"To promote the integration of appropriate postal facilities, including both post offices and processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement."*

#### Car Parking

- viii. Requests that Tipperary County Council provide flexibility with car parking standards for postal facilities.

In support of this request, the submission makes the following points:

- iii. An Post requires use of c. 3,000 vehicles on a daily basis to transport mail within and between settlements throughout the Country.
- iv. Due to the increasing number of larger parcels being processed, it is considered likely that this requirement will increase over time and as such, An Post facilities may require greater levels of parking spaces, including electric vehicle charging

points, as a steady transition is made to the use of environmentally sustainable vehicles

- v. It is important to note, however, that car parking spaces are not only required for An Post delivery vehicles but also for vehicles used by staff that typically travel to An Post facilities by private car and customers collecting mail items.

#### Engagement with An Post

- ix. An Post welcomes and supports the undertaking of public realm works within Town Centres, however requests that the Local Authority carefully consider the operational requirements of An Post at all stages of the development process for any public realm works and that full collaboration and discussions are held with An Post prior to and during any such works.

#### **Consideration**

The support for the Town Centre Regeneration Strategy is welcomed.

The points made regarding access to An Post facilities are acknowledged. Consultation with key stakeholders is a critical part in the development of projects and TCC will continue to consult with all stakeholders in the progression of projects which may impact on their properties/facilities.

It is considered that the Draft LAP provides a sufficient degree to support to An Post related developments such that would accommodate their operational requirements.

Both the Tipperary County Development Plan 2022-2028 and Draft Clonmel LAP provide a suite of policies and objectives that would support new An Post developments and the expansion of existing An Post in accordance with proper planning and sustainable development. Detailed design issues for a proposal such as access, deliveries and parking would be dealt through the development management process.

Notwithstanding, postal facilities provide an important social function, and it is recommended that Policy 5.6 of the Plan is amended to refer to postal facilities.

#### **Recommendation**

It is recommended that the following is undertaken:

1. Amend Policy 5.6 of the Draft LAP to refer to postal facilities (See Amendment 25 in Part 2)

<b>Submission Number:</b>	<b>Submission Name:</b>
50	Sinead Carr, Director of Services, Tipperary County Council Housing Division

### Submission Summary

The submission makes the following points:

- i. Section 2.4 of the Draft LAP refers to the TCC Traveller Accommodation Programme (TAP) 2019-2024, which has established the existing and projected accommodation needs of the Traveller Community in the county;
- ii. For Clonmel & Environs, the TAP 2019-2024 identifies the need for Group Housing for 4 households and a Halting Site for 1 household. As of 31/08/2023, the Council has not delivered any specific group housing or halting sites within Clonmel & Environs on foot of the TAP 2019-2024.
- iii. At present, there are three existing traveller accommodation sites which need to be extended to cater for the increased number of occupants on these sites.
  - Heywood Road Halting Site (additional 4 bays)
  - Condon's Cross (under consideration for new group housing to regularise the site)
  - Brook Crescent Group Housing (additional 3 units)
- iv. These families have all indicated a preference to continue to reside at their current location and the Housing Dept. are of the opinion that extending these sites will cater for their housing needs. The TAP states that where feasible the preferred option in terms of the type of accommodation requested will be considered. The submission references the Joint Committee on Key Issues Affecting the Traveller Community, the report for which recommends that accommodation provision should consider cultural considerations such as Traveller household size and allow future generations to remain living in proximity to their family.

- v. A new Traveller Accommodation Programme for the county will be drafted in 2024 and will include consideration for the above proposals.

### **Consideration**

The points made in respect of the current identified traveller accommodation need in the Clonmel town and environs area are noted. Objective 2F of the Draft LAP supports the implementation of the Tipperary County Council Traveller Accommodation Programme 2019-2024 and any superseding programmes agreed by the Council in accordance with the principles of proper planning and sustainable development.

### **Recommendation**

It is recommended that the following amendments to the Draft LAP are made:

1. Update text under Section 2.4.2 for Traveller Accommodation (See Amendment 11 in Part 2)
2. Include a footnote to Objective 2F in relation to the existing traveller accommodation site at Condon's Cross (See Amendment 12 in Part 2)
3. Change the zoning at the existing traveller accommodation site at Condon's Cross from 'Town Environs' to 'Employment' and amend 'Strategic Employment Site' designation. (See Amendment 86 in Part 2)
4. Amend Table 15 'Zoning Matrix' to change 'Halting Site / Traveller Group Housing' from 'Not Permitted' to 'Open for Consideration' in the 'Employment' zone (See Amendment 54 in Part 2)

## 3.2 Local Bodies / Groups / Organisations

<b>Submission Number:</b> 1	<b>Submission Name:</b> Cllr. Michael Murphy, on behalf of Fine Gael Group – Clonmel Borough District
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only, aligning with the NPF and 'Our Rural Future', Ireland's Rural Development Policy 2021-2025', (DRCD, 2021), which seek to strengthen rural communities.</p> <p>The following points are made in respect of the above:</p> <ul style="list-style-type: none"><li>• In the absence of a 'social need', the policy is inconsistent with the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) for the Southern Region, and Tipperary County Development Plan 2022-2028;</li><li>• Undersupply of houses and continued lack of commencement of new housing developments in the town is affecting local employment;</li><li>• Provision should be made for family members to reside on a family landholding in the environs.</li></ul>	
<b>Consideration</b> <p>The submission relates to the provision of new single dwellings on land zoned 'Town Environs' as covered under Section 5.2.4 of the Written Statement and associated Policy 5.3, with the policy reading as follows:</p> <p>It is the policy of the Council to:</p> <p><i>'Support new dwellings on lands zoned for 'Town Environs' where the applicant meets an 'Economic Need' (see TCDP Table 5.3 and Planning Policy 5 – 11), and there is no availability of alternative sites. An existing and/or shared domestic dwelling entrance of the applicant's family dwelling should be used, where practicable, and it will meet sightline requirements set out in TCDP Volume 3, Appendix 6, Section 6.1 Road Design and Visibility at a Direct Access.'</i></p>	

Lands within the Draft LAP zoned 'Town Environs' are within the wider area identified as being under the urban influence of Clonmel Town (referring to Fig. 5.3 of the TCDP 2022-2028), and associated high demand for one-off houses. Separate but closely related to this 'Areas under Urban Influence' designation is the important role that the lands within the environs have in the long-term growth of Clonmel town. Under the Southern Region's RSES and TCDP 2022-2028, Clonmel is designated as a key town but more importantly a self-sustaining regional driver and strategic employment location. Whilst these lands in the environs are not required for town growth and expansion at present, in due course the town may grow and additional lands may be required, and haphazard development of one-off housing will impact negatively on future use of lands.

For this reason, Section 5.2.4 of the Written Statement and associated Policy 5.3 of the Draft Local Area Plan are in response to the need to protect the environs for long-term growth of Clonmel town.

It is however understood that the national and regional level planning frameworks support rural communities. Noting specifically NPF Policy Objective NPO15:

*'Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.'*

The TCDP 2022-2028 seeks to manage the growth of areas that are under strong urban influence to avoid over-development while sustaining vibrant rural communities by way of Policies 5-11, 5-12 and 5-13. It is reasonable therefore to introduce social need under the qualifying criteria for one-off houses within the environs of Clonmel town to allow limited social need qualification including long term landownership and medical circumstances.

In line with NPF Policy Objective NPO15, and taking account of Clonmel's designation as a regional growth driver and strategic employment location, it is considered justifiable to limit the social need whilst continuing to accommodate those persons with a rural focused economic need. It is considered that the amended policy, outlined below, will allow for a strengthening of the rural communities in the environs of Clonmel without impacting on the future growth of the town.



### Recommendation

It is recommended that the following amendments to the Draft LAP are made:

Amend Section 5.2.4 of the Draft LAP 'One-off Housing in the Town and Town Environs' (See Amendment 20 in Part 2)

Amend Policy 5.3 of the Draft LAP (See Amendment 21 in Part 2)

<b>Submission Number:</b>	<b>Submission Name:</b>
13	J.J. Killian, Clonmel Rugby Club

### Submission Summary

The submission requests that consideration is given to rezoning the lands which house the halting site at Ardgeeha to Amenity status. The submission does not consider it appropriate that a halting site is situated adjacent to a busy rugby club which provides an important sporting service to the town. The submission refers to reasons that have previously been communicated to the Council, public officials and other agencies.

The submission recommends that a portion of the lands at Ballingarrane, be rezoned to accommodate a halting site and requests that the halting site at Ardgeeha, Clonmel be relocated to Ballingarrane.

### Consideration

Please see submission no. 50 which provide information relevant to consideration of this submission and should be read in conjunction with same.

The Tipperary County Council Traveller Action Programme (TAP) 2019-2024 has established existing and projected accommodation needs for the Traveller Community in the County. There is a need to extend the existing site at Heywood Road Clonmel to cater for accommodation needs, in line with the provisions of the TAP.

The TAP states that the preferred option in terms of the type of accommodation requested will be considered. The information provided in submission no. 50 identifies the Heywood Rd

halting site as one of 3no. sites that need to be extended to cater for the increased number of occupants.

In view of the foregoing it is not proposed to amend the zoning of the Draft LAP to accommodate relocation of the Heywood Rd Halting Site.

### **Recommendation**

No changes recommended on foot of this submission.

<b>Submission Number:</b>	<b>Submission Name:</b>
14	Brendan Cagney, St. Mary's Hurling and Camogie Club

### **Submission Summary**

The submission requests that a section of Ballingarrane is re-zoned to amenity use. The submission notes St Mary's Hurling and Camogie Club participation numbers are growing and same are appealing for new land areas to be made available for development to cater for the youth of Clonmel.

### **Consideration**

The Draft LAP allocated Employment zoning to the Ballingarrane landbank and identifies same as a Strategic Employment Site. This is in accordance with the designations for Ballingarrane in higher tier Plans (Regional Spatial and Economic Strategy for the Southern Region 2020 and Tipperary County Development Plan 2022).

Section 4.3.1 and Policy 4.3 of the Draft LAP notes that the Ballingarrane Masterplan applies to development within the campus. The Masterplan document sets out a vision for the lands to develop in a series of Precincts. Precinct 1 is centrally located within the Ballingarrane Campus and the site-specific requirements for same (page 19 of the Masterplan) states as follows:

- This precinct will function as the hub or heart of the estate. Uses to be provided within the "hub" include administrative/ management operations, networking facilities, start-up/innovation units and a central open space/recreational facility.

- The lands to the south of the ornamental garden will be developed as playing pitches for use by Campus occupants and the general public.

The development of playing pitches in Precinct 1 is provided for within the Ballingarrane Masterplan, with an area of 3ha identified for same.

### **Recommendation**

No changes recommended on foot of this submission.

<b>Submission Number:</b>	<b>Submission Name:</b>
32	Ruth Maher, Clonmel Rowing Club

### **Submission Summary**

Clonmel Rowing Club is based on the upper island in the River Suir and is one of the oldest Athletics Clubs in the Country.

The submission makes the point that the whilst Clonmel Rowing Club features at national and international events, at home, however, the club feels quite isolated and restricted in their location. In this respect, the submission requests that the Upper Island is considered in the plans for future development around the River Suir, similar to that for Suir Island.

The submission considers that the promotion of the club and development of the Upper Island would provide a positive addition to recreation and tourism in Clonmel.

### **Consideration**

The Clonmel Rowing Club is located on the eastern end of Upper Island / Moore's Island on the River Suir. This part of the island on which the rowing club is located is accessed via a bridge from Sergeant's Lane to the north. The remainder of the island is currently accessed off the R671 Convent Road, noting a road access to the land to the west, with a tunnel connecting to the land to the east of the road. As shown on the zoning map under the Draft LAP, the entirety of the island is zoned 'Amenity' and affected by Flood Zone A. The objective of the 'Amenity' zone is *'To provide, preserve and enhance open space, biodiversity and*

*amenity uses*, under which 'Parks/Playgrounds' are Permitted in Principle, while 'Sports/Leisure Facilities' are Open for Consideration.

It is considered that the island is well located for the provision of sport, amenity and recreation given its location in the context of the town, Presentation Secondary School, along with the permitted redevelopment of the Former Fair Oaks Food Factory site to the north which includes provision of the part of the proposed Clonmel to Marlfield greenway.

It is considered that a suitably worded text and a new objective could be included in Section 5 'Sustainable Communities'.

### **Recommendation**

It is recommended that the following is undertaken:

1. Section 5.3 of the Written Statement is amended to include reference to the potential for sport, amenity and recreational use at Upper Island / Moore's Island on the River Suir (See Amendment 22 in Part 2).
2. A new objective is added under Section 5.7 of the Written Statement in association with the above, (See Amendment 28 in Part 2).

<b>Submission Number:</b>	<b>Submission Name:</b>
42	Shane Egan, Tipperary Energy Agency (TEA)

### **Submission Summary**

The submission commends the local authority on a well thought out Draft LAP for Clonmel, and makes the following points / requests:

- i. The submission suggests the inclusion of a special symbol to highlight energy and climate action related objectives and policies that have derived from engagement with Tipperary Energy Agency (TEA)
- ii. The submission makes the point that given that the TEA has been engaged throughout the county development plan process, and the development of the LAP, it's recommended to reflect this continued engagement as follows:

- a. Add the following text to the end of the second paragraph at Section 2.2 of the Draft LAP:

*Tipperary County Council will continue to collaborate with the Tipperary Energy Agency (TEA), and other relevant energy agencies, to ensure the Local Authority Climate Action Plan, and this Local Area Plan, reflect the ambitions of the National Climate Action Plan.*

- b. Amend Objective 2H as follows:

***Continue to collaborate*** ~~Engage~~ *with the Tipperary Energy Agency, and other relevant energy agencies, to develop targeted energy and climate action measures within the geographic area of the local area plan.*

- iii. The submission requests that the LAP supports district heating and centralised biomass boiler/ heat pump systems, whether private/public or mixture of both, via relaxed/no planning and innovative approaches for easements, for plant and piping, in readiness for future projects. And recommends the following:

- a. Include the following new objective to Chapter 2:

*Support district heating and centralised biomass/biogas boiler/ heat pump systems, whether private/public or mixture of both, via relaxed/no planning and innovative approaches for easements, for plant and piping, in readiness for future projects.*

- b. Amend Objective 3M to include reference to the provision of a district heating system as part of the Delahunty Square Public Realm Project.

### Consideration

- i. The use of special symbols denoting climate action objectives is accepted and considered to be a positive addition to the LAP.
- ii. The suggested inclusion of a sentence to the end of paragraph 2 in Section 2.2 with respect to the collaboration between TCC and TEA to ensure that the LAP and LACAP reflect the ambitions of the National CAP is accepted.

The recommendation to amend Objective 2h is accepted.

- iii. The recommendation to include a new Objective 2i in order to support district heating and centralised biomass boilers / heatpumps is accepted.

### Recommendation

It is recommended that the following is undertaken:

1. Add a new paragraph of text, including reference to a special symbol to denote climate action objectives, at the end of Section 1.3 of the Written Statement (See Amendment 3 in Part 2).  
  
Amend the Draft LAP to assign the climate action symbol to climate positive objectives under each chapter (See Amendment 7 in Part 2).
2. Add additional text to the second paragraph under Section 2.2 of the Written Statement to acknowledge continued collaboration between TCC and TEA (See Amendment 4 in Part 2).
3. Amend Objective 2H (See Amendment 8 in Part 2).
4. Include a new objective under Section 2.5 to support district heating and centralised biomass boiler / heat pump systems (See Amendment 10 in Part 2).

<b>Submission Number:</b>	<b>Submission Name:</b>
62	Martin Bourke, on behalf of Construction Studies Group, CBS High School Clonmel

### Submission Summary

The submission makes the following suggestions:

- Provide more amenities and social spaces for young adults, for example, courts, green spaces and benches;
- Provide more bins for areas outside the town centre;
- Address issues of vacant shops;
- Provide more cycle infrastructure;
- Improve wheelchair accessibility;
- Improve traffic management in the town.

### Consideration

Section 5.3 of the Draft LAP notes the town is well served in terms of open spaces and amenities with GAA, rugby, Soccer, Tennis, Swimming, horse and greyhound racing facilities

in the town, together with Mulcahy Park, Denis Bourke Park, a Regional Sports Hub, Slalom Course and river Suir Blueway. Section 5.3 notes the development of playground spaces and the provision of allotment space will be supported. The Council are engaged in initiatives to further improve the towns amenities through development of Suir Island gardens and extension of the Suir Blueway.

The provision of bins is an operational matter for Clonmel Borough District. Section 8.4 of the Draft LAP supports the sustainable management of waste.

The point made regarding empty shops is noted. A particular focus of the Draft LAP is targeting vacant and derelict lands within Clonmel for regeneration. Section 3 of the Draft LAP sets out the Town Centre Strategy, a key principle of which to support the re-generation of the town centre as a place to work, live, visit and do business.

The requirement for increased cycle infrastructure is noted. The Draft LAP is supported by a Local Transport Plan (Appendix 2 of the Draft LAP) that sets out a number of initiatives to improve cycling infrastructure in Clonmel. These initiatives sit within a wider proposal for traffic management for Clonmel which are set out under the Local Transport Plan.

Policy 6.3 of the Draft LAP seeks to ensure new development within the Draft LAP area provide universal access (in particular for persons with disabilities, reduced mobility and older people) where a whole journey approach is considered.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

74

**Submission Name:**

Deirdre Murray, Clonmel Tidy Towns

**Submission Summary**

- i. Page 26, Section 3.1, Town Centre First

Reference to Charles Bianconi is missing from the Town Centre 2030 Transformation Regeneration. The first regular public transport system in Ireland is of historical significance and is not mentioned in the Plan.

ii. Page 41, Section 4.3, Tourism Strategy

Dowd's Lane has not progressed.

iii. Section 4.3.2 Active Town Centre Streets

Fáilte Ireland's identification of Clonmel as a Destination Town in their Castles and Conquests Visitor Experience Development Plan could be built on for Clonmel. The named and natural heritage could be promoted with emphasis on food production, foraging, green infrastructure etc.

iv. Page 73, Section 7.2.1, Built Heritage and Record of Protected structures.

The list of iconic structures in the town fails to include the Merchants House on the Quay or the historic gardens in the town. Unclear what the inclusions on page 75 refer to.

v. Page 73, Section 7.1.4, Trees

Comments on tree planting provided for the Rejuvenation Plan for Clonmel's Town Centre.

vi. Page 77, Section 7.2, Policy and Objective

Request that the provision be native Irish Trees that are relevant to the locality. Same applies to hedging.

vii. Appendix 1 Serviced Land Assessment

Lack of cycle lanes on Table 1 shows the importance of the reintroduction of the Town Bus Service.

viii. Appendix 2 Local Transport Plan

Page 38, Section 2.12- Removal of parking from one side of Irishtown would allow for provision of dedicated cycle lane and would allow for access to St Marys CBS is taken from Joyce's Lane to top of Irishtown.

Page 53, Section 6.2-Proposals for secure cycle parking supported. Absence of cycle racks at Delahunty Sq. noted.

Page 54-Map clearly shows disjointed nature of cycle lanes in Clonmel.

Section 6.2.1 Safe Routes to school-Concern that the proposal may happen as an isolated project doing nothing to relieve the issues on Albert St or Irishtown.



Page 83, Section 6.2.6- Questioned whether Option AT100 and AT101 is possible noting it's through private grounds.

Page 89, Section 6.3-Request that the overall plan to create a more tourist friendly appearance to the train station are dealt with.

Discussion of Figure 6-25 and Graph on page 100- Reference to nearest school not considered appropriate given the nature of schools.

ix. Appendix 3: Schedule of Regeneration Sites

Questioned whether Site 1 is up to date noting planning permission for Muslim Community Centre.

Site 8 may also need updating as one house on Old Quay is being refurbished.

x. Appendix 4: SEA Environmental Report

First half of report awkward to read and page 85 is missing.

Page 58, Figure 4.15- Site referred to is not named. No links provided to where information can be accessed

Concur with objectives on Page 61, Table 7.1 and encourage Council to promote same.

xi. General Comments- More to be done to encourage people to visit and stay in Clonmel. Extension of wilding of Clonmel to create walks and biodiversity features, enhancement of historical features, development of food trails is suggested as a way of doing this.

### **Consideration**

The points made in the submission are addressed below in the order they are set out:

i. Page 26, Section 3.1, Town Centre First

The point is noted. While the Flights of Discovery does include proposals for promoting the historical importance of Bianconi to Clonmel, specifically noting the plans relating to Westgate and the Bianconi Carriage Tour, Section 7.2 of the Draft LAP is to be amended to incorporate references to Charles Bianconi and the fact that Ireland's first overland public transport system was started in Clonmel. The importance of Clonmel's Coach Arches and the base of this enterprise (Hearn's Hotel) to be noted in this regard.

ii. Page 41, Section 4.3, Tourism Strategy

This point is noted. The Dowds Lane proposals form a key element to the Flights of Discovery Tourism proposal and the Draft LAP support this proposal.

iii. Section 4.3.2 Active Town Centre Streets

This point is noted. Such measures are supported under Objective 3G of the Draft LAP.

iv. Page 73, Section 7.2.1, Built Heritage and Record of Protected structures.

The list of structures on Page 73 is not exhaustive and does not include all structures of significance in Clonmel. The location of the inclusions (19,20 and 31) on page 75 identify the following Recorded Monuments: (TS083-021, TS083-020 and TS03-020001 and TS083-031 and TS083-031001).

v. Page 73, Section 7.1.4, Trees

The point is noted.

vi. Page 77, Section 7.3, Policy and Objectives

The requirement for landscaping plans to include for native trees, hedges and shrubs is set out under Section 3.7, Volume 3 of the TCDP 2022-2028.

vii. Appendix 1 Serviced Land Assessment

This point is noted. The Local Transport Plan contains an indicative bus network for Clonmel. It is anticipated that a bus service for Clonmel will be rolled out by the NTA by December 2023.

viii. Appendix 2 Local Transport Plan

Page 38, Section 2.12 - The point is noted. An assessment of the potential to provide a 2-way cycle track along Irishtown was considered at the optioneering stage of the project. Given the narrow aspect of the street, the provision of such a facility would necessitate the removal of parking from both sides of street in certain locations. Whilst the provision of such a facility would be beneficial, it was considered that this would need to be balanced against the impact on local residents and businesses on the street, with a particular view to the town centre first policy which seeks to encourage town centre living. The LTP identifies an alternative east-west quiet route to the north of Irishtown along Albert Street to facilitate safe pedestrian and cyclist connectivity to the town centre.

Page 53, Section 6.2 - The point is noted. The LTP recommends the provision of quality, secure cycle parking in Clonmel Town Centre and at other key locations in order to meet future demand. A specific objective will be included in the LTP, to recommend high quality secure cycle parking at appropriate locations to be delivered in line with guidance set out within the National Cycle Manual.

Page 54- The point is noted. The measures outlined in the Draft LAP and LTP seek to improve cycle infrastructure in Clonmel.

Section 6.2.1 Safe Routes to school- The concern that the implementation of the Cantwell Street proposals are delivered in isolation are noted. In agreement with this statement, it is the intention of the LTP to deliver the proposed walking and cycling network measures in tandem with Safe Routes to School schemes, in order to provide a holistic approach to delivering a safe and attractive active travel network across Clonmel. It is acknowledged that it will take a number of years to deliver the proposed networks for the Town of Clonmel and subject to the continued funding support of the NTA.

Page 83, Section 6.2.6- It is the intention of the LTP to provide a quiet way through the church grounds (via AT101) but it is acknowledged that these are private grounds which can be closed during certain periods. TCC will engage with the appropriate stakeholders to deliver this measure.

Page 89, Section 6.3 - The points made in relation to the rail station appearance are noted. The LTP recommends the development of a Mobility Hub at the rail station. In order to improve accessibility to the train station, the development of the Mobility Hub will include for public realm enhancements at the entrance to the station, facilitating improved interchange between various transport modes. This will help improve the appearance of the train station, thereby improving the attractiveness of the rail service.

However, the text of the Draft LAP can be revised to include an objective to enhance the civic space surrounding the rail station.

Discussion of Figure 6-25 and Graph on page 100 - The purpose of the school catchment maps are to illustrate the overall level of increased sustainable accessibility to schools within Clonmel. For the purpose of this assessment, it is not deemed necessary to undertake a further level of disaggregation to review accessibility to boys/girls or primary/secondary schools.

ix. Appendix 3: Schedule of Regeneration Sites

The inclusion of Sites 1 and 8 as Regeneration Sites under Appendix 3 is justified given the location and nature of the sites and significant re-development potential for same. The Planning Authority is aware of planning and development status of the sites.

x. Appendix 4: SEA Environmental Report

The SEA Environmental Report is a technical document; however, Appendix II comprises a Non-Technical Summary. Page 85 of the report is contained in the reports made available or display (through the Council website and hard copy).

Figure 4-15 is a high-level map showing archaeological monuments in Clonmel and the wider rural area. More information on these monuments can be accessed through [www.archaeology.ie](http://www.archaeology.ie). Reference to this website can be included in the SEA Environmental Report as a footnote.

The Strategic Environmental Objectives outlined in Table 7.1 are used as standards against which the provisions of the Draft LAP are evaluated in order to help identify which provisions would be likely to result in significant environmental effects. This allows identification of and mitigation of environmental effects to be integrated into the Plan making process.

xi. General Comments- The point is noted.

### **Recommendation**

It is recommended that the following is undertaken:

1. Section 7.2 of the Draft LAP is amended to include reference to Clonmel's association with Charles Bianconi and the importance of same (See Amendment 48 in Part 2)
2. New objective included under Section 3.7 to support the enhancement of the civic space around the train station (See Amendment 14 in Part 2)
3. A specific objective will be included in the LTP, to recommend high quality secure cycle parking at appropriate locations to be delivered in line with guidance set out within the National Cycle Manual (See Amendment 70 in Part 2)
4. Insert a footnote at Figure 4.15 of the SEA Environmental Report to refer to [www.archaeology.ie](http://www.archaeology.ie) (See Amendment 76 in Part 2)

<b>Submission Number:</b> 103	<b>Submission Name:</b> Deirdre Murray, Clonmel Tidy Towns
<b>Submission Summary</b> <p>The submission outlines suggestions presented to Clonmel Tidy Towns from members of the public. Same are outlined as follows</p> <ul style="list-style-type: none"><li>i. A dedicated dog park to be established somewhere in the town to let dogs run.</li><li>ii. Provisions of bins on the blueway.</li><li>iii. All premises that use disposable cups to show they are meeting targets regarding re-usability</li><li>iv. Charles Bianconi to be promoted as part of town's history</li><li>v. Water dispensers to be erected throughout the town and incorporated into public realm works.</li></ul>	
<b>Consideration</b> <p>The points made in the submission are noted. The considerations regarding same are as follows:</p> <ul style="list-style-type: none"><li>i. There is no dedicated dog park in Clonmel and no current plans to provide for a dog park.</li><li>ii. Bins are provided at key entry points to the Blueway. It is not proposed to place bins along the Blueway due to access issues for waste collection and maintenance and flood risk implications.</li><li>iii. The initiative to promote coffee shops to use re-usable cups is noted. This initiative is supported by Section 8.4 of the Draft LAP which seeks a reduction in the production of waste in Clonmel in line with the National Waste Management.</li><li>iv. See consideration i) to submission 74.</li><li>v. Water dispensers have been erected at Kickham Plaza. The provision of further water dispensers as part of further public realm works n Clonmel can be considered.</li></ul>	
<b>Recommendation</b> <p>See recommendation to submission 74 in respect of Charles Bianconi.</p>	

### 3.3 Zoning Related Submissions

<b>Submission Number:</b> 85	<b>Submission Name:</b> Joe Ryan, on behalf of Residents of Moangarriff
<b>Submission Summary</b> <p>The submission makes the following points:</p> <ul style="list-style-type: none"><li>i. Inclusion of Moangarrif area in LAP welcomed.</li><li>ii. Disincentive to walking and cycling noted in Section 5 of LAP acknowledged as is the support for developing future walking and cycling options from this area to the town centre (Figure 2).</li><li>iii. The desired sustainable planning criteria are not met for Site 26 and 27 in Serviced Land Assessment (SLA). Lands designated as Part Strategic Reserve (SR) and SR, as opposed to Tier 1 and 2 lands.</li><li>iv. Site 26 is unsuitable for residential development due to many deficiencies.</li><li>v. Access road to Moangarriff is not suitable to support additional traffic serving any future development on lands west of Meadowlands estate and east of Gurtnafleur Rd. This was acknowledged in Clonmel and Environs Development Plan 2008 (Page 27) and backed up by other reports (De Jong Report, Planners Report under Planning Application Reference 2/18/00). Other businesses have opened access to the road since these reports</li><li>vi. Road safety is already compromised on Moangarrif Rd and using the road to access any major development would further compromise safety through increased traffic. Access off Applegreen, Equine Traffic, lack of continuous footpaths and cycle paths present safety issues.</li><li>vii. Request that provisions 2008 Clonmel Plan be included in LAP with requirement that future development west of Meadowlands be accessed off the Gurtnafleur Road. Alternatively, someone from Council to explain why use of Moangarriff Rd is now acceptable.</li></ul>	

- viii. Noted from OPR submission on pre-draft that there is excess of zoned development land relative to its needs. Request that sites 26 and 27 be de-zoned from residential until the inadequacies have been addressed.

### Consideration

The points made in the submission will be addressed in the order in which they are presented.

- i. The point is noted.
- ii. The point is noted.
- iii. Site 26 and 27 of the Serviced Land Assessment are identified on the Map below. Site 26 is sized 8.2 ha and out of this 1.38ha is zoned Existing Residential (construction has commenced on 7 detached houses on this portion of lands), 3ha is zoned New Residential (there is a planning application pending a decision on appeal for development of 68 houses on this portion of lands) and the remainder is zoned Strategic Reserve. The entirety of Site 27 is zoned Strategic Reserve.

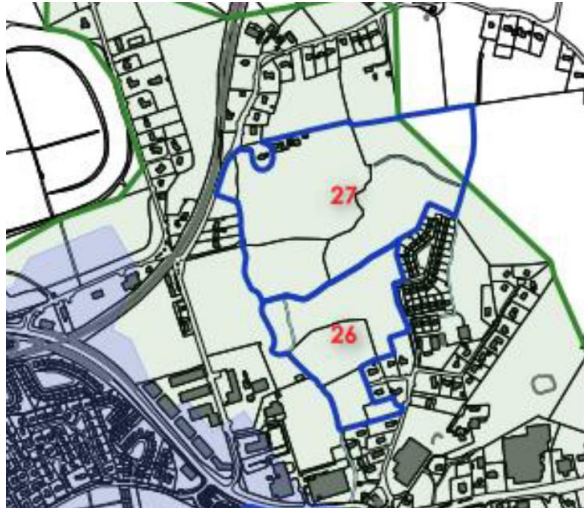
The allocation of residential zoning to lands is informed by an evidenced based Serviced Land Assessment (Appendix 1 of the Draft LAP), this assessment demonstrates that the land is serviced by roads, footpaths, water, lighting and foul drainage infrastructure. The Draft LAP notes some infrastructural deficits and measures are included in the Draft Local Transport Plan to address same.

The methodology for assessment of lands is set out under Section 2.3 of the SLA, land zoning is also influenced by the provisions of the Development Plans- Guidelines for Planning Authorities (DHLGH, 2022). Section 4.4.1 of the above referenced Guidelines state *that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning.* In the case of Site 26 the area of lands zoned New Residential under the current Clonmel and Environs Development Plan has been reduced by 3.7 ha.

On review of the SLA it is acknowledged that the Overall Score for Site 26 is Part SR. This can be expanded to account for part of the lands being suitable for residential development.

In view of the concerns raised in the submission regarding Site 27, the existing zoning provisions for the site (currently zoned Environs), the lack of recent Traffic Assessment

for the lands it is recommended the SLA and associated zoning provisions for the lands can be reviewed.



- iv. See commentary above.
- v. Regarding the points made on access limitations with the Moangarriff Road the SLA and commentary above note the position regarding available road and footpath infrastructure. In addition, under PI Ref 18/600858 a detailed Traffic Impact Assessment (TIA) was undertaken that noted no capacity issues with the Moangarriff Roundabout on the N24 or the Moangarriff roadway. This was accepted by the Board Inspector in the consideration of the appeal made on this application (ABP-304695-19). The details submitted with this application indicate areas on the Moangarriff roadway where improvements to pedestrian infrastructure is required to support new residential development and it is reasonable to state that these improvements can easily be delivered as part of development of the lands.

#### Moangarriff Roundabout

The Draft LTP recommends the implementation of active travel improvements along Davis Road linking the Moangarriff Roundabout to the town centre. As noted within the LTP, improvements along the N24, including the Moangarriff roundabout are currently under review as part of the option selection process for the N24 Waterford to Cahir study. This stage of the project is due for completion by the end of 2023. A further public consultation on these proposed measures will take place following completion of this stage of the project.

#### Moangarriff Road



The Draft LTP provides recommendations for traffic calming and footpath upgrades along the Moangarriff Road connecting to the Meadowlands estate (Measure AT93 in Figure 6-17 of the LTP). This will improve safety for pedestrians and cyclists along this road and provide a more attractive connection to the wider active travel network proposed in the LTP.

- vi. See commentary above.
- vii. See commentary above.
- viii. See commentary above.

### **Recommendation**

It is recommended that the following is undertaken:

1. The SLA Overall Score be reviewed to account for part of the lands within Site 26 being suitable for residential development (See Amendment 64 in Part 2).
2. No change to the zoning objectives across Site 27. Also refer to response to Recommendation 1(i) under the OPR submission (Submission No. 102).

<b>Submission Number:</b>	<b>Submission Name:</b>
86	Tony Bamford Planning Consultants, on behalf of Began Property Ltd.

### **Submission Summary**

The submission makes the following points regarding the Draft LAP and lands owned by Began Property Ltd:

- i. Draft LAP content regarding property owned by Began Property Ltd generally welcomed.
- ii. Regarding lands at Gladstone St (Mulcahy's premises) the submission contains no comments at this time.
- iii. Regarding Lands at Market Street/Emmet Street the submission notes that architects are currently engaged in planning a mixed residential/carpark development. Began are working with a housing agency on this development and engaging with TCC Housing Section. Site Zoning and designation as a Regeneration Site welcomed. Submission

requests that the following sentence is added to the Key Planning Criteria for the site under Appendix 3:

*The Council will work with landowners to realise their development ambitions for the site. The Council will be flexible in the nature of the end uses proposed.*

- iv. Regarding lands at Burgagery Lands East, Davis Road (north of) the submission notes that architects have been engaged to prepare plans for a residential scheme and that the landowner is in discussions with TCC Planning Section.
- v. Regarding lands at Burgagery Lands East, Davis Road (south of) the submission welcomes the Employment and Amenity zonings. The submission notes that plans for the site include a private medical facility and requests that Medical Facility (Private) is added as a use that is open for consideration.
- vi. Regarding lands at Burgagery Lands West, Frank Drohan Rd (west of Tesco) the submission welcomes the Employment zoning with allocation of Retail Warehouse as open for consideration. The submission requests clarification on potentially conflicting sections of the Draft LAP on page 87 and Objective 7-4 of the TCDP 20022-2028. The submission includes suggested amendments to text on page 87, as follows (red text to be deleted, green text is new text):

*Facilitate opportunities for compatible industry and general employment uses. General employment areas should be highly accessible, well designed, permeable and legible with a modest density of employees. Inappropriate intensive office uses at locations poorly served by public transport., ~~and the proliferation of retail or commercial uses requiring public access that are best located in mixed-use or town core areas will not be acceptable.~~*

*Facilitate logistics and warehouse type activity including storage, distribution and associated re-packaging of goods and products with a low density of employees. These uses have specific transportation requirements as they can generate considerable traffic volumes and should be located within a purpose built, well designated environment connected to the strategic road network. ~~Proposals for the sale of bulky goods/goods in bulk within high quality settings and highly accessible locations shall be subject to the requirements of the Retail Planning Guidelines.~~*

*Proposals for new retail floorspace in other locations must demonstrate compliance with the 'sequential approach' and demonstrate to the satisfaction of the planning authority*

*that there is a need for retail warehouse floorspace in accordance with Retail Planning Guidelines for Planning Authorities, (DECLG 2012) or any amendment thereof.*

### **Consideration**

The points made in the submission will be addressed in the order in which they are presented:

- i. This point is noted.
- ii. No comments made in the submission regarding the lands at Gladstone Street.
- iii. Section 3.3.1 of the Draft LAP outlines the commitment by the Council to work with landowners through its planning, housing and local enterprise function to reduce vacancy and dereliction. In view of this the suggested amendment to the Key Planning Criteria for the lands under Appendix 3 is not considered necessary.

The lands are zoned Urban Core and the range of uses permissible under this land use zone is wide ranging. Inclusion of a statement that the Council will be flexible in the nature of the end uses proposed for the lands is not appropriate as the uses must conform to the zoning objectives for the lands and Town Centre policies and objectives contained in the Draft LAP.

- iv. The point made regarding the lands at Burgagery Lands East, Davis Rd (north of) is noted.
- v. Regarding lands at Burgagery Lands East, Davis Road (south of) the requests that Medical Facility (Private) is added to the Land Use Zoning Matrix as a use that is open for consideration is noted. This is not considered necessary as Doctor/Dentist/Healthcare Practitioner is Open for Consideration on Employment Zoned lands. Also refer to the response under Submission No. 108.
- vi. Regarding lands at Burgagery Lands West, Frank Drohan Rd (west of Tesco) and the concern with the wording on page 87 of the Draft LAP and Policy 7-4c of the TCDP it is considered that the wording of page 87 is clear and (where same references retail) is consistent with the provisions of the TCDP and Retail Planning Guidelines 2012 as they relate to Retail and Retail Warehousing.

The policy context for retail warehousing is set out, inter alia under Section 3.5 of the Draft LAP and Sections 7.3.1, Section 7.3. and Policy 7-4 of the TCDP.

### **Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

91

**Submission Name:**

John Long, Barne Accessories

**Submission Summary**

The submission notes that the Ballingarrane Park – Strategic Business, Science and Technology Campus is currently zoned “Employment”. The submission requests that the matrix of permitted uses within the zoning term “Employment” be extended to include a “Warehousing, Distribution and Logistical facility”.

**Consideration**

The Land Use Zoning Matrix of the Draft LAP shows that *Warehousing and Logistics* use is Permitted in Principle of lands zoned for Employment use.

The Ballingarrane Campus is zoned for Employment use but is also designated as a Strategic Employment Site under the Draft LAP and the provisions of Section 4.0, Section 4.2 and the Ballingarrane Masterplan apply to development within the campus, together with all other applicable policies, objectives and development management standards.

**Recommendation**

No change to the Draft LAP.

**Submission Number:**

93

**Submission Name:**

Michael & Anne Fitzgerald

**Submission Summary**

The following points are made in the submission relating to lands at Moangarriff:

- i. Infrastructural Deficits at Moangarriff: The submission notes that water supply services are inadequate and unreliable. Residents in the area have experienced low pressure, lack of supply and quality concerns over the past year.

The submission considers the road infrastructure serving Moangarriff does not meet safety needs of existing users. In particular the submission notes safety and speed issues with the Moangarriff roundabout.

The submission further notes conflicts between residential and non-residential traffic in the Moangarriff road, risks to non-vehicular road users, absence of a continuous footpath from Meadowlands estate to the Moangarriff roundabout, lack of safe road crossings for non-vehicular users traveling from Moangarriff /Meadowlands to Clonmel Town and entry point to the Suir Greenway.

- ii. Zoning of lands west of Meadowlands Unclear how sites 26 and 27 in the SLA meet the criteria for zoning for housing. Sites should therefore be de-zoned. Same consideration applies to site 8 on SLA for lands for employment.

- iii. Planning History for lands west of Meadowlands Estate. -The submission requests that previous Local Authority policy for the lands be taken into account. In this regard the submission notes:

- planning application PDA/2/18/00 where the planners report stated the Moangarriff road is not suitable for traffic from 105 houses.
- De Jong Report
- County Development Plan 2008

The submission notes the above considered the Moangarriff Rd unsuitable for access to the lands for residential purposes, access was to be provided via the Gurtnafleur Road.

The policy position changed under the 2018 Development Plan without any consultation meetings with local residents. Unclear as to how the considerations regarding the suitability of the road changed. The submission requests that the reference to the unsuitability of the Moangarriff Rd for the purpose of accessing new residential development be inserted into the Clonmel LAP.

**Consideration** See consideration under submission no. 85

**Recommendation**

See recommendation under submission no. 85.

**Submission Number:**

95

**Submission Name:**

Armstrong Planning, on behalf of Powerstown Park Ltd.

**Submission Summary**

The submission relates to lands of 63 ha located at Powerstown, Clonmel, the lands include Clonmel Racecourse. The following points are made in the submission:

- i. **LAP Boundary** - The submission requests that the racecourse is included in the LAP boundary in the final Clonmel LAP and the text of the LAP is amended to acknowledge the crucial role that Powerstown Park plays in promoting tourism, generating employment, stimulating the local economy and offering recreational and amenity facilities.
- ii. **Zoning** - Lands along the southern periphery of the racecourse measuring 17 ha (see image below) is surplus to the requirements of the racecourse operation and consideration to be given to the following options for the lands:

**Option 1** - Zone area of lands on map below for Light Industry. The submission considers the site is suited to Light Industrial zoning.



The points made in the submission are noted. The Draft LAP currently provides for a quantum of 146.64 ha of available lands zoned Employment, in addition to 104.93ha identified for Strategic Employment, 40.44ha zoned General Industry. In view of the location of the identified landbank adjoining the Carrigeen Business Park and noting the current limitations on development sites within said business park and the availability of existing infrastructure serving this business park, the allocation of a section of the western end of the lands for Employment zoning have been considered, and following assessment against the Employment SLA (see Amendment 66, Part 2), it is recommended that a 4.5ha block on the western end of the submission land be zoned 'Employment'. While access may be restricted from the N24, there is potential for through access off the existing road network off Carrigeen Roundabout. The zoning of this parcel of land would allow for orderly and sustainable growth of an existing established employer in the town. Taking account of proposed amendment 84, the net change for available 'Employment' zoned land is a slight decrease to 145.74ha (plus 104.93ha at Ballingarrane).

**Recommendation**

It is recommended that the following amendments to the Draft LAP are made:

1. The Employment SLA Table and Map is amended to include a new 4.5ha site north of the N24 and immediately east of the Glenpatrick Spring Water plant (See Amendment 66 in Part 2);

By association, the Zoning map is amended to change the zoning objective of the land from 'Open Space & Recreation' to 'Employment' (See Amendments 56, 61 and 84 in Part 2).

<b>Submission Number:</b> 98	<b>Submission Name:</b> McCutcheon Halley Planning Consultants, on behalf of Melclon Unlimited Company
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**Submission Summary**

The submission relates to 3.1ha of greenfield land located immediately west of the existing Gort na Manach housing estate on the western edge of the town. The submission makes the following points:



- Under the Draft Clonmel LAP, the land is zoned R1 'New Residential' the objective of which is to "provide for new residential development."
- The submission requests that the zoning of the land be retained for residential use and included within the settlement boundary for Clonmel town
- The land is located within close proximity of a range of existing services and facilities with easy access to sustainable modes of transport;
- The development of the land for housing would support the objectives of the NPF, Southern RSES and Tipperary County Development Plan 2022-2028;
- The submission refers to the planning history of the land, including a 2020 decision from An Bord Pleanála to refuse permission for 74 no. houses on the grounds of layout and density that was considered to be too low.

### Consideration

The points made in the submission are noted. The submission land was evaluated as part of the Residential Serviced Land Assessment (SLA) contained in Appendix 1 to the Draft LAP. The submission does not request any change to the Draft LAP.

### Recommendation

No changes recommended on foot of this submission. However, the recommendation in response to Submission 102 (OPR) includes a review of the SLA in respect of Site 11 (See Amendment 64, Part 2);

<b>Submission Number:</b>	<b>Submission Name:</b>
99	David Mulcahy Planning Consultants, on behalf of The Treacy Group

### Submission Summary

The submission relates to greenfield land known as The Galloping Fields, located south east of the Showgrounds Shopping Centre, sharing its southern boundary with the River Suir / Blueway. The submission makes the following points:

- i. The mixed-use zoning on The Galloping Fields is welcomed;

- ii. Under the zoning objective 'Mixed-Use', there are no land uses 'permitted' and instead there is a long list of uses 'open for consideration', submitting that a majority of uses should be changed to 'permissible';
- iii. Referring to Appendix 3 'Regeneration Sites', specifically Regeneration Site No. 14 which relates to the submission land, the submission requests the following:
  - That the second point under 'Key Planning Criteria', namely '*One point of access/egress should be provided through the former mart land in the north-east corner of the site*', be clarified to make it clear that this new access point is in addition to the established access point so as to make it clear that there is no curtailment of the operation of use of the existing access point to these lands.
  - The submission asks that an indicative route for a new pedestrian link/avenue through the site (third bullet point under 'Key Planning Criteria') be shown in the LAP. The submission includes a map suggesting that the optimum route would be along the western edge of the site via the existing accessway from Davis Road.

### Consideration

- i. Noted.
- ii. The objective of the 'Mixed Use' zone is to support the role of the town centre and enable primarily retail, commercial, civic and other uses. Considering the peripheral nature of the zone, particularly in the context of the urban core, any use proposed on the land must be evaluated to ensure that it responds to the locational context, even more important for the submission lands considering the location close to the urban core of the town.
- iii. The submission with regards access is considered as follows:
  - The submission refers to the use of an existing roadway north west of land. Referring to PI. 06550132/07550152/0855005, this road was identified as an access for servicing of part of the Showgrounds Shopping Centre. Considering this, it would be undesirable for this access road to become the main access point to the development lands to the rear. However, considering the fact that this access road is closer to the town centre than the eastern end, it would be reasonable to have pedestrian / cycle access, subject to assessment of part of a planning application.

In this regard, the bullet point may be amended to acknowledge the potential of the existing road as a secondary access point.

- The submission considers that the optimum route for a new pedestrian link would be along the western edge of the site via the existing accessway from Davis Road. Considering the nature of the existing road, it would not be desirable for this roadway to become a pedestrian link to the Suir Blueway. The eastern end of the site is considered to be the most suitable option. A development layout could provide for a high-quality pedestrian / cycle avenue linking Davis Road with the Suir Blueway unhindered by existing built form. No change recommended however the third bullet point under 'Key Planning Criteria' for Site 14 can be amended to include reference to cycle in addition to pedestrian access.

### **Recommendation**

It is recommended that the following amendment to the Draft LAP is made:

1. Amend the second bullet point under the 'Key Planning Criteria' for Site 14 with respect to access arrangements (See Amendment 74 in Part 2).
2. Amend the third bullet point under the 'Key Planning Criteria' for Site 14 to include reference to a cycle link (See Amendment 75 in Part 2)

<b>Submission Number:</b>	<b>Submission Name:</b>
101	Stephen Ward Planning Consultants, on behalf of South City Ltd.

### **Submission Summary**

The submission relates to lands known as the Former Fair Oaks Food Factory, located at Abbey Road / Convent Road. This site has recently been granted planning permission for a residential led mixed use development under P.A. Ref. 2260538. The submission makes the following points:

- i. The subject site is zoned 'Regeneration', the objective of which is to *'Provide for targeted enterprise and/or residential-led regeneration within the consolidation area on underused sites'*

- ii. The submission supports the 'Regeneration' zoning objective applied to the lands but seek clarification on the maximum housing delivery capacity set out at Section 2.4.3 and Table 8 of the Draft LAP

Land zoning	Area (ha)	Maximum Housing Delivery Capacity
New Residential	96.04	Calculated at 100% Residential = 2,401 units
Urban Core	56.17	Calculated at 30% Residential Share = 421 units
Mixed Use	20.91	Calculated at 30% Residential Share = 157 units
Regeneration	6.79	Calculated at 50% Residential Share = 85 units

Table 8: Land use zoning that can accommodate new residential growth

- iii. In order to encourage and facilitate development on regeneration / brownfield lands located towards the core of the settlement, it would be in the interests of the proper planning and sustainable development of the area if there was no cap or limitation placed on the residential capacity on lands zoned 'Regeneration'.
- iv. It is always a good thing to see regeneration of lands and placing a cap on these sites might only unnecessarily inhibit residential development on these 'Regeneration' lands. The provision and level of mixed-uses can be controlled via the development management system on a case-by-case basis.
- v. The submission suggests that the wording to the 'Regeneration' row to Table 8 is changed to read – *“Estimated Residential Share c. 85 units. This is not a cap or a capacity estimate and the level of residential development within the Regeneration sites will be determined via the development management system on a case by case basis”*

### Consideration

Table 8 in the Draft LAP is intended to demonstrate the potential residential yield of 'Urban Core', 'Mixed Use' and 'Regeneration' zoned land in the town. Considering that the National Policy Objective (NPO 3c) of NPF requires that at least 30% of all new housing units must be delivered within the existing built-up footprint/compact growth area of the town, and having regard to the Town Centre First (TCF) Policy (February 2022) and Sustainable and Compact Settlements Guidelines for Planning Authorities (draft for consultation August 2023) it is reasonable that the LAP for Clonmel should support regeneration of town centre sites with housing capacity and suitable density to be evaluated at planning application stage.

### Recommendation

It is recommended that the following amendment to the Draft LAP is made:

- i. Amend Table 8 under Section 2.4.3 of the Written Statement to change the heading 'Maximum Housing Delivery Capacity' to 'Indicative Housing Delivery Capacity' (See Amendment 5 in Part 2)

<b>Submission Number:</b>	<b>Submission Name:</b>
108	Tom Philips & Associates Planning Consultants, on behalf of Casana Developments Ltd.

### Submission Summary

The submission focuses on the restrictive provisions surrounding nursing home developments on lands proposed to be zoned for 'Employment' within the Draft Clonmel Local Area Plan 2024-2030. The submission proposes that Nursing Homes should be Open for Consideration (rather than 'Not Normally Permitted') on lands zoned 'Employment' in the Clonmel Local Area Plan 2024-2030.

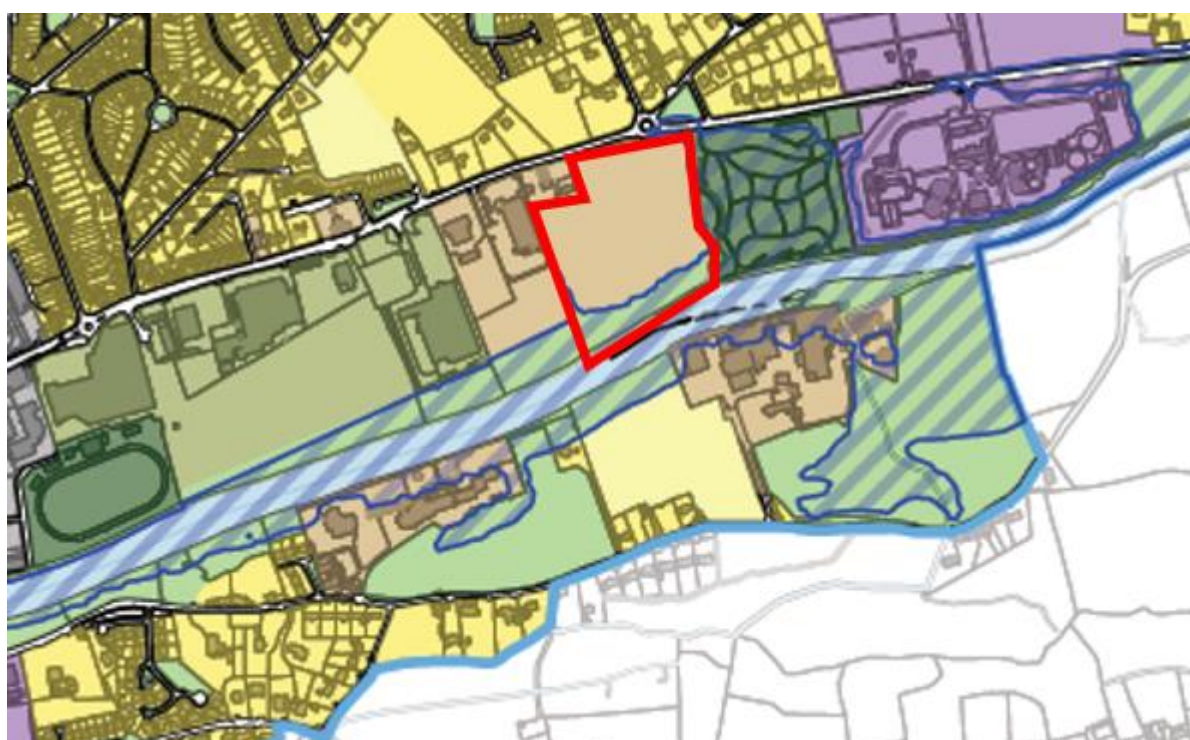
The following points are made in the submission in support of the above proposal:

- i. Casana Developments Ltd is a proper development and investment company, is committed to ongoing investment within Clonmel and welcomes the visions for the settlement as set out in the Draft Clonmel Local Area Plan 2024-2030.
- ii. There is a high demand for nursing home development based on demographic trends (ageing population) and closures due to poor standards of accommodation with a likely undersupply of nursing home bed spaces in Clonmel and its wider hinterland.
- iii. There is a requirement to provide additional high quality, purpose-built, residential care facilities that meet national standards, meet the needs of older people and employ suitably qualified professionals.
- iv. New purpose-built nursing homes are becoming more viable than retrofitting and upgrading existing facilities.
- v. Nursing homes are significant generators of employment when compared against other uses listed as permitted in principle on Employment zoned lands (haulage/bus/truck parks, light industrial uses, warehousing and logistics).

- vi. Increase nursing home bed spaces can free up acute hospital bedspaces.
- vii. The NPF and RSES sets out planning policy support for services and facilities to support people as they age and notes the projected trend of an ageing population with associated demand on housing and healthcare services.
- viii. The status of Retirement Home/ Nursing Home as not normally permitted in Employment zoned lands considered to conflict with NPO 30 of the NPF. The change to Open for Consideration would align with the RSES.
- ix. There is a lack existing nursing home facilities within Clonmel and a lack of provision for new nursing homes developments within the Clonmel and Environs Development Plan zoning matrix.
- x. The population projections under the Tipperary County Development Plan 2022 (TCDP) show a demand for purpose-built nursing home facilities.
- xi. 'Retirement/Nursing Home' is listed as 'Open for Consideration' on 'Employment & Enterprise' zoned lands under the TCDP. The TCDP recognises the role nursing homes play in contributing towards the achievement of the Employment & Enterprise zoning objective and contains a number of policies that support nursing homes (Section 5.4.2, Policy 5-8 and Objective 5-C).
- xii. The Draft Clonmel LAP contains limited policy or planning guidance for new nursing home development. There are the restrictive provisions for purpose-built accommodation for the ageing population on 'Employment' zoned lands. Nursing homes support economic growth, and such developments should be considered on their merits on lands zoned for employment purposes, and against the policies and objectives of the TCDP and national policy.
- xiii. Inhibiting the provision of nursing home developments on 'Employment' lands will restrict the opportunity to deliver on Policy 2.2 and Objective 2G of the Draft LAP.
- xiv. Under the Roscrea LAP the 'Employment' objective includes 'Retirement/Nursing Home' as an 'Open for Consideration' land use. Both the Draft Thurles Local Area Plan 2024-2030 and Draft Nenagh Local Area Plan 2024-2030 lists 'Retirement/Nursing Home' as 'Not Normally Permitted'. there appears to be a lack of consistency across the board and an inconsistency with the TCDP.

- xv. Referring to Submission 119, a Flood Risk Assessment (FRA) is included for the development of the site at Davis Rd Clonmel, Co. Tipperary. The FRA advises that Casana Developments Limited intend to lodge a planning application for a mixed-use development (Healthcare Campus, Retail and nursing home) on the lands.

The submission provides an indicative development layout for the lands and undertakes a detailed Flood Risk Assessment of the lands that concludes the proposals are compliant with the Planning System and Flood Risk Management -Guidelines for Planning Authorities 2009.



**Lands to which submission relates outlined red.**

### **Consideration**

The points made in the submission regarding Clonmel experiencing an ageing population and the need to cater for same are noted, as are the points regarding the economic contribution of nursing homes.

The Planning Authority note the planning policy context for nursing homes and accommodating an ageing population as set out in the Tipperary County Development Plan

2022-2028 and higher order plans (RSES for the Southern Region and NPF) and this context the land use zoning of the Draft Clonmel LAP.

The land use zoning matrix of the Draft LAP shows that Retirement/Nursing Home is either *Permitted in Principle* or *Open for Consideration* on lands zoned for *Urban Core, Regeneration, Mixed Use, Existing Residential, New Residential and Community, Services and Infrastructure*. There is a significant quantum of lands available under these land use zones that can accommodate new Retirement/Nursing Homes in a high-quality setting. However, having regard to the specific locational context of the submission lands, i.e. footpath / cycle lane connection to the town centre, adjacent Mulcahy Park, ready access to the Suir Blueway, and established residential neighbourhoods to the north, it is considered that a 'Retirement / Nursing Home' use on the submission lands would be reasonable. On further consideration of the land context, it is considered that a 'mixed-use' zoning for the site would have the potential to deliver a range of uses to benefit the town, and an opportunity to provide connectivity with the Suir blueway. It is considered appropriate to require that the development of the lands should include a pedestrian and cycle link to the Suir blueway, promoting active travel.

In respect of the Site-Specific Flood Risk Assessment:

Overlaps between parts of the subject site zoned 'Employment' under the Draft LAP and Flood Zone A/B (as shown in the Draft Plan and accompanying SFRA) has been subject to the Development Plan Justification Test, which is appropriate to decisions relating to land use zoning (as set out in Section 4 the Ministerial Guidelines for Flood Risk Management), which is different to the Development Management Justification Test that is appropriate to decisions relating to the consideration of projects (as set out in Section 5 the Ministerial Guidelines for Flood Risk Management).

The submission is accompanied by a site-specific Flood Risk Assessment that includes a Development Management Justification Test.

**Recommendation**

It is recommended that the following amendments to the Draft LAP are made:

- i. Change the zoning of the submission land from 'Employment' to 'Mixed Use' (See Amendments 5, 6, 56, 60 and 85 in Part 2)



- ii. Include a new policy under Section 6.6 to require the provision of new pedestrian and cycle link/avenue between land identified as Site 6 on the Employment Serviced Land Assessment (Appendix 1 of the LAP) and the River Suir Blueway (See Amendment 45 in Part 2)

**Submission Number:**

109

**Submission Name:**

Morrissey Construction Ltd.

**Submission Summary**

The submission advises that

- Morrissey Construction Ltd are the owners of 3.01 ha of lands in Moangarriff, adjacent to the Meadowlands estate.
- Morrissey Construction Ltd are supportive of the New Residential zoning for the lands as proposed under the Draft LAP.
- The site is ready to go with all necessary infrastructure in place to support new residential development and is in the ownership of a company whose main business is building houses for the private market.
- A planning application for development of 68 houses on the lands under PI 22/60353 was granted by the Local Authority, a decision on the appeal of the decision to grant is expected before end of the year.
- If permission is granted it is intended to proceed with construction, providing much needed private housing for sale.
- Morrissey Construction Limited were the developers of most of the private housing in Clonmel during the lifetime of the 2013 Plan and are currently developing 7 houses in Moangarrif for the private market.

**Consideration**

The points made in the submission are noted. The Draft LAP provides New Residential zoning on the lands to which PI. Ref. 22/60353 relates. The submission is supportive of this zoning

and outlines a commitment to develop the lands should planning permission from An Bord Pleanála be secured.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

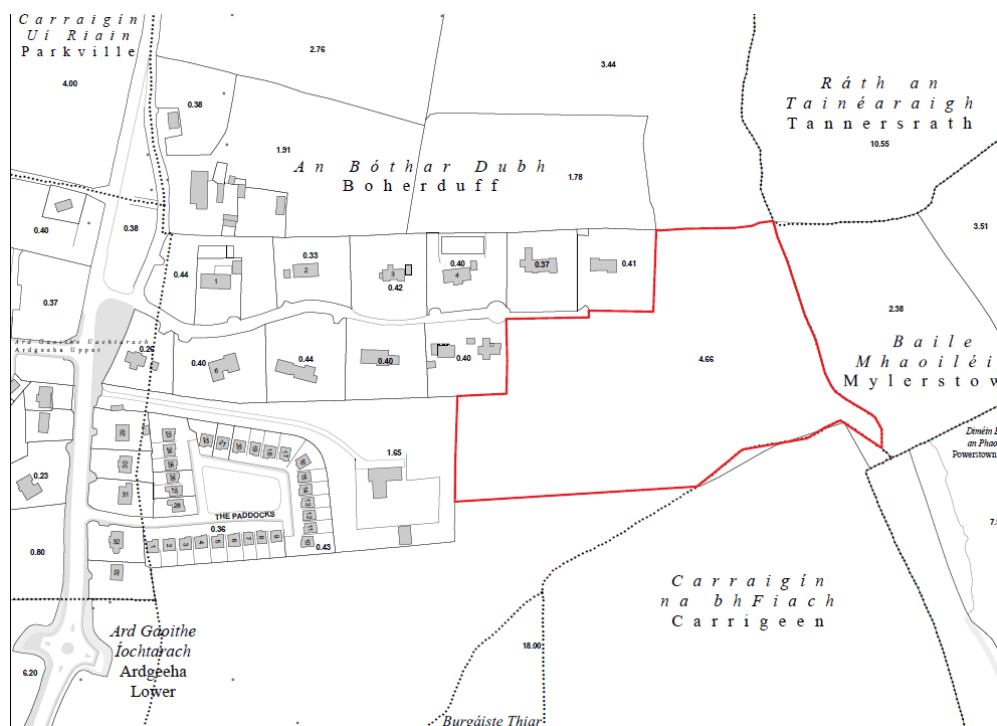
111

**Submission Name:**

Cummins & Voortman Ltd., on behalf of Patrick Long, Rosemary Hutch, Frances O'Connor, Jessica Long, Sarah Long and Elaine Long

**Submission Summary**

The submission relates to lands sized 4.2 ha located at Boherduff, outlined in red on the map below, and accessed from the Fethard Road via the LT32793.



The submission notes the lands are zoned for new residential development under the Clonmel and Environs Development Plan 2013, as varied, and are zoned as Strategic Reserve under the Draft LAP. The submission requests the site retain its new residential zoning status.

The submission notes the provisions of the Serviced Land Assessment of the Draft LAP that relate to the site and considers that works could be delivered as part of a planning application to service the lands and the lands should be categorised as Tier 2 lands under a Serviced Land Assessment.

The submission notes:

- The land is within close proximity to existing footpaths and the foul sewer.
- There are tier 1 lands located at a further distance from the town centre.
- The segregated cycle facility proposed under the Local Transport Plan comes close to the site in Boherduff and could be extended as part of any future planning application to serve the lands.
- The site is suitable for development of serviced sites. Development of this type is in demand in Clonmel.
- The site, given its proximity to the town centre, offers access by active travel means.
- The owners are committed to develop the lands and a survey of the site has been commissioned.

### **Consideration**

The points made in the submission are noted.

The allocation of residential zoning to lands is informed by an evidenced based Serviced Land Assessment (Appendix 1 of the Draft LAP), this assessment examines lands in the context of the availability of required infrastructure and sustainability criteria. The methodology for assessment of lands is set out under Section 2.3 of the SLA. Land zoning is also influenced by the provisions of the Core Strategy of the Tipperary County Development Plan 2022-2028 and higher order Plans (RSES and NPF) that establish the growth framework for Clonmel.

The SLA assessment undertaken for the lands show that same are not serviced by a foul, sewer, footpaths, or cycle lanes. These services are not proximate to the lands. The considerations and scoring for the lands and zoning of same as Strategic Reserve is therefore considered appropriate.

It is important to note that the growth strategy for Clonmel gives rise to a demand for 85.3 ha of lands. The Draft LAP has zoned 96.04 ha of lands for New Residential development.

The point with regards to serviced sites is also noted. National Policy Objective NPO18b of the National Planning Framework supports local authorities developing programmes for serviced sites in small towns and villages, whereas for larger towns including key towns such as Clonmel, residential development of suitable and sustainable density is expected to ensure a valued return on capital investment in public infrastructure and to build a population to sustain and expand the employment base for the town.

It should also be noted that a submission in respect of this land was received by the Planning Authority during public consultation on the Residential Zoned Land Tax (RZLT). The submission, which is available to view on the Tipperary County Council website, requests that the land be excluded from the RZLT map, and states the following: *'As it stands there is no service capacity available sufficient to enable housing to be developed. Accordingly, while zoned for housing development it is not a serviced block of land'*.

#### **Recommendation**

No changes recommended on foot of this submission.

<b>Submission Number:</b>	<b>Submission Name:</b>
119	Tom Philips & Associates Planning Consultants, on behalf of Casana Developments Ltd.

#### **Submission Summary**

This submission comprises a Flood Risk Assessment (Rev. 4, dated 11 September 2023) to be read in place of the Flood Risk Assessment (Rev 3, dated 6 September 2023) included with Submission Ref. 108.

#### **Consideration**

Refer to Submission 108

#### **Recommendation**

Refer to Submission 108

### 3.4 Individual Submissions

<b>Submission Number:</b> 2	<b>Submission Name:</b> Cllr. Michael Murphy
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only, aligning with the NPF and 'Our Rural Future', Ireland's Rural Development Policy 2021-2025', (DRCD, 2021), which seek to strengthen rural communities.</p> <p>The following points are made in respect of the above:</p> <ul style="list-style-type: none"><li>• In the absence of a 'social need', the policy is inconsistent with the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) for the Southern Region, and Tipperary County Development Plan 2022-2028;</li><li>• Undersupply of houses and continued lack of commencement of new housing developments in the town is affecting local employment;</li><li>• Provision should be made for family members to reside on a family landholding in the environs.</li></ul>	
<b>Consideration</b> See response to Submission No. 1	
<b>Recommendation</b> Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b> 3	<b>Submission Name:</b> Will McGarry
<b>Submission Summary</b>	

1. The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.
2. The submission also refers to lands south of the River Suir within the administrative area of Waterford City and County Council, noting that those lands that are zoned 'High Amenity' under the Waterford City and County Development Plan 2022-2028 allow for a social need to qualify for a rural house.

### Consideration

1. See response to Submission No. 1
2. In response to the point made in respect of the Waterford side of the river, it should be noted that Chapter 7 of the Waterford City and County Development Plan 2022-2028 states that for the 'High Amenity' zone, rural houses will be considered where the applicant has a genuine demonstrable economic, social or local need for a first home for their own permanent occupation, but in all cases, where the applicant is an existing landowner.

### Recommendation

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b>	<b>Submission Name:</b>
5	Darragh Ryan

### Submission Summary

1. The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only, aligning with the NPF policy and 'Our Rural Future', Ireland's Rural Development Policy 2021-2025', (DRCD, 2021), which seek to strengthen rural communities.

2. More residential development is required in the towns of Clonmel and Cahir to support growing industry.

**Consideration**

1. See response to Submission No. 1
2. For Clonmel, the Draft LAP includes provision for 96.04ha of land zoned 'New Residential'. Referring to the Serviced Land Assessment contained in Appendix 2 of the LAP, the zoning of this land is evidence based, ensuring that only land that is serviced or servicable within the lifetime of the LAP is zoned. This ensures that new residential development can commence in a timely manner. In addition, the Draft LAP supports the provision of new residential development by way of regeneration / development of under-utilised / vacant / derelict town centre sites through the 'Urban Core' and 'Regeneration' zoning alongside the identification of 'Regeneration Sites' in Appendix 3 of the Draft LAP. Note that land use and development for Cahir is covered under the Cahir Local Area Plan 2021-2027.

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

6

**Submission Name:**

Jessica Kenny

**Submission Summary**

Single houses should be permitted on land zoned 'Town Environs' on the basis of a social need.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b> 7	<b>Submission Name:</b> Kevin Walsh
<b>Submission Summary</b> Single houses should be permitted on land zoned 'Town Environs' on the basis of a social need.	
<b>Consideration</b> See response to Submission No. 1	
<b>Recommendation</b> Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b> 8	<b>Submission Name:</b> Caitriona Nagle
<b>Submission Summary</b> Single houses should be permitted on land zoned 'Town Environs' on the basis of a social need.	
<b>Consideration</b> See response to Submission No. 1	
<b>Recommendation</b> Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b>	<b>Submission Name:</b> James Duffy
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9

### **Submission Summary**

The submission relates to the proposal under the Draft Local Transport Plan (LTP) to provide a quietway between Springfields Estate to the Davis Road (AT-25). The submission notes the link does not form part of the recent planning application made for the area and questions whether it should be included as a condition of planning.

### **Consideration**

The LTP identifies under Table 6-2 and Figure 6-17 an intervention to provide a permeability link between Springfields Estate and Davis Rd. The link is shown on Figure 6-17 to traverse lands to which application PI Ref 2360148 relates. PI. Ref. 2360148 is an application for 18 residential units.

Tipperary County Council granted permission under PI Ref 2360148, subject to conditions on 21/6/2023, prior to the publication of the Draft LAP and LTP. The matter of connectivity with Springfields was explored by the Planning Authority but was not included by the applicant due to the intention that the development be for elderly occupants and concerns with anti-social behaviour.

The site in question is the subject to a live planning application with An Bord Pleanála. The LTP identifies this link as a permeability link to enhance walking / cycling between Springfield and Davis road. Best practice permeability principles apply to all new developments, these can be found in the DoECLG publications, Sustainable Residential Development in Urban Areas. The Draft LTP recommends improved permeability and connectivity in Clonmel through the following statement: Any new residential or employment developments (including expansion of existing) in Clonmel will also need to provide active travel infrastructure throughout the proposed developments, which will connect to the proposed set of measures outlined in this LTP.

Note that pursuant to Section 18(3)(a) of the Planning and Development Act 2000 (as amended), the local authority or An Bord Pleanála may also consider any relevant Draft local plan which has been prepared but not yet made.

### **Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

10

**Submission Name:**

Eoin Kenny

**Submission Summary**

Single houses should be permitted on land zoned 'Town Environs' on the basis of a social need.

Allowing scope for social need will help alleviate the housing crisis by freeing up rental accommodation in the town.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

11

**Submission Name:**

Elizabeth O'Hara

**Submission Summary**

The submission notes the problem of anti-social behaviour occurring at a site located at Giantsgrave crossroad on main road. The submission states the site needs to be developed into a private house for the people that rightfully own the site

**Consideration**

Addressing anti-social behaviour is outside the remit of the Draft LAP.

Should a development proposal come forward for the lands it will be examined in the context of the statutory plans and policies in force at the time of deciding on the application.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

12

**Submission Name:**

Cllr. Richie Molloy, on behalf of Keith & Shirley Conway

**Submission Summary**

Single houses should be permitted on land zoned 'Town Environs' on the basis of a social need, allowing a child of a long-term landowner to build a house.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

15

**Submission Name:**

Cllr. Niall Dennehy

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

16

**Submission Name:**

Robert & Ciara Hannon

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only, aligning with the NPF and 'Our Rural Future', Ireland's Rural Development Policy 2021-2025', (DRCD, 2021), which seek to strengthen rural communities.

Allowing a 'social need' would align the policy with the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) for the Southern Region, and Tipperary County Development Plan 2022-2028.

Allowing scope for social need in limited circumstances such as infill sites in long-term family ownership will not impact on long term future expansion of the town.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

17

**Submission Name:**

Anne & Tom Hannon

**Submission Summary**

- Local people should be allowed to build on family land.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

18

**Submission Name:**

Cllr. Richie Molloy

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

A social need should allow scope for families whose members may have additional needs and may require additional assistance.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

19

**Submission Name:**

Gearóid Fitzgibbon (SEAI Tipperary County Sustainable Energy Community Mentor)

**Summary:**

The submission relates to energy planning, energy efficiency and renewables, and makes the following points:

- i. In Section 2.3 Framework for Delivery, table 3: funding Programmes, The Climate Action Fund is listed as supporting capacity building. The SEA community believe this is not the case as it stands.
- ii. Policy 2.3 is welcomed as is the reference to new housing development being compact and near zero energy rated. However, the submission finds that the Local Area Plan contains no specific measurable objectives relating to energy efficiency or renewable energy.
- iii. Objective 2H, engaging with Tipperary Energy Agency and other agencies to develop targeted energy and climate action. This measure is welcomed and the submission requests that the local authority goes further and sets targets and develop its own energy initiatives.
- iv. Objective 2A, support the community to identify and implement measures and actions in accordance with the Tipperary Climate Action Plan 2023. The submission is concerned that this amounts to asking unpaid volunteers to undertake additional voluntary work and requests that the local authority outline in a specific measurable way it's role in helping communities implement the actions of the Tipperary Climate Action Plan.
- v. Referring to Section 5.1, 'Clonmel Low- Carbon and Sustainable Energy Community', the submission requests that the Local Area Plan clarifies what support the local authority will provide to local communities to engage in programs such as the SEAI Sustainable Energy Community programme, sectoral adaptation plans and sustainable energy and climate initiatives. The submission also notes that it would be appropriate in this paragraph to mention the SEAI Sustainable Energy Communities mentor and include a weblink for further information.
- vi. Referring to Objective 5A, the submission requests that specific and measurable indicators are included on what the support for communities will entail and what role the local authority will undertake in local energy planning.
- vii. Referring to Section 8.1 'Energy Demand and Renewable Energy' and Policy 8.1 'Support the use of renewable energy technologies ...' the submission notes that details are lacking under this objective, and the objective should include specifics and measurable indicators.

### **Consideration**

The submission, in general terms, requests further detail on specific measures that are included within the Draft LAP. It is reasonable that specific or measurable actions are outlined.

However, the Draft LAP is fundamentally a spatial land-use plan and it is beyond the scope of the LAP to provide or commit to specific objectives, as this is the role of other local authority plans, including the Local Authority Climate Action Plan. The role of the LAP is to provide strategic direction for future development and provide policy support for this strategic direction in the assessment of new development proposals.

With regard to the SEAI Sustainable Energy Communities mentor, it is considered that the LAP, a strategic and spatial land use plan for a 6-year period, would be the incorrect forum for the inclusion of this measure.

The Climate Action Fund (CAF) was established to provide assistance and financial support to projects which will help Ireland achieve its climate and energy targets. The reference included in the Draft LAP aligns with the information published in February 2020 by the Dept. of Environment, Climate and Communications and is therefore considered appropriate. Refer also to the response to submission no. 88, received from the Dept. of Environment, Climate and Communications.

**Recommendation**

No amendments recommended to the Draft LAP.

**Submission Number:**

20

**Submission Name:**

Shauna Keane

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b> 21	<b>Submission Name:</b> Niall Prendergast
<b>Submission Summary</b> <p>The Local Area Plan should align with the NPF, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 22	<b>Submission Name:</b> Bernard & Rosie Cunningham
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	



<b>Submission Number:</b> 23	<b>Submission Name:</b> Seamus Lawlor
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 24	<b>Submission Name:</b> John & Nancy O'Driscoll
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 25	<b>Submission Name:</b> Jamie Cahill
<b>Submission Summary</b>  The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.	
<b>Consideration</b>  See response to Submission No. 1	
<b>Recommendation</b>  Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b> 26	<b>Submission Name:</b> Sandra Lawlor
<b>Submission Summary</b>  The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.	
<b>Consideration</b>  See response to Submission No. 1	
<b>Recommendation</b>  Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b> 27	<b>Submission Name:</b> Siobhan McGrath
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 28	<b>Submission Name:</b> Shane Walsh
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 29	<b>Submission Name:</b> Jennifer Boland
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 30	<b>Submission Name:</b> Sharon Fitzgerald
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 31	<b>Submission Name:</b> Linda Collins
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 33	<b>Submission Name:</b> Jason & Aine Cunningham
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 34	<b>Submission Name:</b> Sarah & Paddy Codd
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 35	<b>Submission Name:</b> Pamela Treacy
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 36	<b>Submission Name:</b> Niall Brannigan
<b>Submission Summary</b>  The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.	
<b>Consideration</b>  See response to Submission No. 1	
<b>Recommendation</b>  Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b> 37	<b>Submission Name:</b> Catherine & Gerry Treacy
<b>Submission Summary</b>  The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.	
<b>Consideration</b>  See response to Submission No. 1	
<b>Recommendation</b>  Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b> 38	<b>Submission Name:</b> Kathleen O'Brien & Alma O'Brien
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 39	<b>Submission Name:</b> Barry & Aoife O'Driscoll
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	



<b>Submission Number:</b> 40	<b>Submission Name:</b> Paul Fitzgerald & Sinead O'Brien
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 41	<b>Submission Name:</b> Keith & Shirley Conway
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only, aligning with the NPF and 'Our Rural Future', Ireland's Rural Development Policy 2021-2025', (DRCD, 2021), which seek to strengthen rural communities.</p> <p>Allowing a 'social need' would align the policy with the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) for the Southern Region, and Tipperary County Development Plan 2022-2028.</p> <p>Allowing scope for social need in limited circumstances such as infill sites in long-term family ownership will not impact on long term future expansion of the town.</p>	
<b>Consideration</b>	

See response to Submission No. 1

### **Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b>	<b>Submission Name:</b>
43	Thomas Ryan

### **Submission Summary**

The submission suggests the following:

- i. Blue Way developed more from Cahir to Clonmel via the villages of Ardfinnan and Newcastle areas;
- ii. Grass cutting to areas such as the River Bank at Raheen Road, The Glass Bridge, and along the Blue Way;
- iii. Completion of proposed tourist projects in Clonmel;
- iv. Designated pollinator friendly areas;
- v. A focus on watersports and fishing on the River Suir;
- vi. Creation of an Inclusion Hub to cater for all elements of society;
- vii. Improve bus services between the outskirts of Clonmel in areas such as Powerstown, Lisronagh, Marlfield, Clerihan Kilcash and Kilsheelan.

### **Consideration**

- i. The proposal for a dedicated greenway link between Clonmel and Cahir is being examined by the Council Active Travel Team. A Strategic Assessment Report has been completed and the feasibility report for this project is under review. Such an initiative is supported by Policy 4.4 and Objective 7B of the Draft LAP and under Chapter 14 of the Tipperary County Development Plan 2022-2028.
- ii. Grass cutting operations matter for Clonmel Borough District and is not a matter for the Draft LAP.

- iii. Objective 4I of the Draft LAP specifically supports the delivery of planned tourism projects for the town.
- iv. It is an objective of the Tipperary County Development Plan 2022-2028 (Objective 11-D) to support the All-Ireland Pollinator Plan 2021- 2025, and to prepare a 'Pollinator Action Plan' for Tipperary over the lifetime of the county plan.

Clonmel Borough District have designated areas for pollination within the urban area such as Loreto Park, Parts of Denis Burke Park on Raheen Road, Toberheena Well, wildflowers were planted along the N24 bypass and on parts of the Blueway. The district will add to these areas annually to increase our contribution to the All-Ireland Pollinator Plan.

- v. The text under Section 5.3 of the Draft LAP can be amended to refer to the importance of the River Suir as an amenity asset to the town. In addition, a new objective can be included under Section 5.7 to support water-sports and other water-based recreational activities.
- vi. Policy 5.6 of the Draft LAP would support a proposal for the creation of an Inclusion Hub
- vii. Objective 12-L of the Tipperary County Development Plan 2022-2028 supports the Local Link Rural Transport Programme of the NTA, and other national, regional and local initiatives for public transport; whilst Objective 12-I seeks to work with the NTA and stakeholders, including 'Local Link Tipperary', through their 'Connecting Ireland' initiative, in identifying opportunities to enhance the public bus network.

The National Transport Authority's Connecting Ireland Rural Mobility Plan aims to increase transport connectivity for people living in Rural Ireland. The plan aims to improve mobility in rural areas, and it will do this by providing better connections between villages and towns by linking these areas with an enhanced regional network connecting cities and regional centres nationwide. The Connecting Ireland Plan proposed a number of bus routes serving surrounding rural towns and villages between Clonmel and Thurles and Dungarvan (including Twomileborris, Urlingford, Fethard, Lisronagh, Holycross, Boherlahan and Cashel) via local routes 356, 393 and 394.

### **Recommendation**

It is recommended that the following is undertaken:

1. Section 5.3 of the Written Statement is amended to include reference to the amenity and recreational value of the River Suir (See Amendment 22 in Part 2).
2. A new objective is added under Section 5.7 to promote the River Suir for sport and recreational activities. (See Amendment 29 in Part 2).

<b>Submission Number:</b>	<b>Submission Name:</b>
44	Cllr. Richie Molloy

### Submission Summary

The submission makes the following points:

- i. Increased frequency of grass cutting/collection in housing estates during the summer
- ii. Promote fishing, the local golf clubs and Hillview Sports Club to attract tourists to the area
- iii. More signage to promote the River Suir blueway
- iv. Increase community policing on the River Suir blueway to combat anti-social behaviour
- v. Promote the redevelopment of Market Place and the former Clonmel Arms Hotel site
- vi. Increase active use of Kickham Plaza including summer concerts and as a new location for Clonmel farmers' market

### Consideration

- i. Grass cutting operations matter for Clonmel Borough District and is not a matter for the Draft LAP.
- ii. The points made regarding sports clubs and water-based activities is noted. Section 5.3 of the Written Statement can be amended to include reference to golf and pitch & putt. Section 4.3 of the Written Statement can be amended to include reference to the tourism value of local sports clubs and water-based activities including fishing.

A new objective can be included under Section 4.4 to promote the tourism value of local sports clubs and water-based activities.

It is also considered appropriate to include a policy requiring the design of new residential development on land adjacent to existing / established sports facilities to

have regard to the potential residential amenity impacts associated with the normal operation of the sports facilities.

- iii. Policy 4.4 of the Draft LAP Support tourism related development including signage. Furthermore, Objective 9-G of the Tipperary County Development Plan 2022-2028 seeks to collaborate with Fáilte Ireland, TII and other key stakeholders in the development and implementation of a digital technology enhancement programme, including interpretation and way-finding to support our tourism economy, to include branded orientation signage, digital innovation and roadside signage.
- iv. The matter of policing the blueway is outside the remit of the LAP.
- v. Under the Draft LAP, Market Place and the former Clonmel Arms Hotel are zoned 'Urban Core', a zone which is flexible to town centre type uses, including retail, office and residential. In addition, both properties are identified as a 'Regeneration Site' under Appendix 3 to the Draft LAP, along with a set of key planning criteria to assist the landowner with development proposals. Section 3 of the 'Written Statement' states that due to its scale, location and relationship to the retail core, Council will place particular emphasises on both Market Place and the former Clonmel Arms Hotel, underpinned by Policy 3.1 and 3.2 which seek to support compact growth through the redevelopment of the identified 'Regeneration Sites'. The Council have engaged with the owners of both sites regarding re-development proposals.
- vi. Objective 3G of the Draft Plan would cover this '*Promote events, festivals, activities etc. on the streets and public spaces to increase and improve the tourism, cultural and lifestyle profile of the town*'

### **Recommendation**

It is recommended that the following is undertaken:

1. Amend Section 5.3 of the Written Statement to include reference to golf and pitch & putt (See Amendment 22 in Part 2).
2. Amend Section 4.3 of the Written Statement to include reference to the tourism value of local sports clubs and water-based activities including fishing (See Amendment 17 in Part 2)

3. Include a new objective is added under Section 4.4 to promote the tourism value of local sports clubs and water-based activities (See Amendment 19 in Part 2)
4. Add text under Section 5.3 to refer to the potential residential amenity impacts associated with the normal operation of the sports facilities (See Amendment 23 in Part 2)
5. Include a new policy under Section 5.7 to require new residential developments to consider the potential residential amenity impacts associated with the normal operation of existing adjacent sports facilities (See Amendment 27 in Part 2)

<b>Submission Number:</b>	<b>Submission Name:</b>
45	Cllr. Pat English

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

Allowing a 'social need' would align the policy with the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) for the Southern Region, and Tipperary County Development Plan 2022-2028.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b> 46	<b>Submission Name:</b> Ciaran Lorigan
<b>Submission Summary</b>  The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.	
<b>Consideration</b>  See response to Submission No. 1	
<b>Recommendation</b>  Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b> 47	<b>Submission Name:</b> Mairead O'Toole
<b>Submission Summary</b>  The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.	
<b>Consideration</b>  See response to Submission No. 1	
<b>Recommendation</b>  Amendment to Draft LAP is recommended. See Amendments 20 and 21.	

<b>Submission Number:</b> 48	<b>Submission Name:</b> David Lorigan
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 49	<b>Submission Name:</b> Tom Lorigan
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	



<b>Submission Number:</b> 51	<b>Submission Name:</b> Brian Heffernan
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 54	<b>Submission Name:</b> John Keating
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 55	<b>Submission Name:</b> John Heffernan
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 56	<b>Submission Name:</b> Anthony Power
<b>Submission Summary</b> <p>That the Council in association with relevant government departments develop a cycle/walking path from Clonmel to Cahir via Ardfinnan and Newcastle. Benefits are numerous in terms of tourism, rural employment and long-term improvements in health and well-being.</p>	
<b>Consideration</b> <p>The submission is noted.</p> <p>The proposal for a dedicated greenway link between Clonmel and Cahir is being examined by the Council Active Travel Team. A Strategic Assessment Report has been completed and the feasibility report for this project is under review.</p> <p>Such an initiative is supported by Policy 4.4 and Objective 7B of the Draft LAP and under Chapter 14 of the Tipperary County Development Plan 2022-2028.</p>	

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

57 (duplicate of 56)

**Submission Name:**

Anthony Power

**Submission Summary**

That the Council in association with relevant government departments develop a cycle/walking path from Clonmel to Cahir via Ardfinnan and Newcastle. Benefits are numerous in terms of tourism, rural employment and long-term improvements in health and well-being.

**Consideration**

See consideration for submission 56.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

58

**Submission Name:**

Anthony Power

**Submission Summary**

That Clonmel ban the use of disposable coffee cups and implement a deposit scheme, similar to the initiative introduced in Killarney, leading to a reduction in litter going to rubbish bins and landfills.

**Consideration**

The initiative referred to is noted. This initiative is supported by Section 8.4 of the Draft LAP which seeks a reduction in the production of waste in Clonmel in line with the National Waste

Management. Just to note that the 'Killarney Coffee Cup Project' was initiated and established in July 2023 by a group of local hotels and coffee shops.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

59

**Submission Name:**

Anthony Power

**Submission Summary**

That all rubbish bins be replaced by pedal bins, resulting in a significant reduction of litter due to bigger bins and efficiency for staff in cleaning bins.

**Consideration**

The submission relates to the capacity of bins. This is an operations matter for Clonmel Borough District and is not a matter for the Draft LAP.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

63

**Submission Name:**

Downey Planning, on behalf of Amy O'Driscoll and Stephen Cunningham

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

Allowing a 'social need' would align the policy with the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) for the Southern Region, and Tipperary County Development Plan 2022-2028.

The current Draft LAP policy discourages people from residing in the environs of Clonmel which they may have an extended family history and ties to the area; and need to take care of their families for medical reasons.

Addition of demonstration of a social need will create vibrant communities.

### Consideration

See response to Submission No. 1

### Recommendation

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b>	<b>Submission Name:</b>
64	Brian McCarthy

### Submission Summary

#### Housing in the 'Town Environs'

1. The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only. The social need could be limited to direct descendant of a long-term landowner, where the site has been in the ownership of that immediate family for over 10 years.

#### Transport and Connectivity

2. Priority should be given to the construction of link roads 1 to 2, from the Cashel Road at Ardgeeha to the existing roundabout at The Paddocks on the Fethard road, onwards to the existing roundabout at Carrigeen on the existing Clonmel inner-relief road, a

measure which would immediately solve the traffic chaos on the existing Clonmel inner relief road at the Cashel and Fethard Road roundabouts.

### Consideration

1. See response to Submission No. 1
2. The proposed link roads mentioned in the submission are currently being assessed, along with a number of other options, as part of the N24 Waterford to Cahir scheme. This project is being progressed by Kilkenny County Council as lead authority, in partnership with Tipperary County Council, Transport Infrastructure Ireland (TII) and the Department of Transport (DoT). The project is progressing through Phases 1 to 4 of the TII's Project Management Guidelines (PMG) and is currently at Phase 2 Option Selection. The Clonmel LTP supports the progression of the N24 Waterford to Cahir project through TII's PMG phases to identify a sustainable transport solution that supports the multi-modal needs of the corridor at a local and regional level.

### Recommendation

1. Amendment to Draft LAP is recommended. See Amendments 20 and 21.
2. No alterations recommended to the Draft LAP or LTP

<b>Submission Number:</b>	<b>Submission Name:</b>
65	Joe Ryan

### Submission Summary

- i. Welcomes the inclusion of Moangarriff in the Draft LAP;
- ii. Considers it positive to see the disincentive to walking and cycling acknowledged and support of developing future walking and cycling options from this area to the town centre;
- iii. The submission centres on the N24 Moangarriff Roundabout, noting that it is dangerous due to the speed of cars coming in particular from the Kilsheelan side;
- iv. The submission suggests that the provision of a pedestrian crossing on the N24 at the entrance to the Blueway carpark at Carey's Slip in addition to traffic calming measures

(rumble strips etc) on the town side, a measure which the submission believes would address traffic speed and increase walking and cycling.

### Consideration

The safety concerns outlined in the submission are noted. The Clonmel LTP proposes the upgrade of a number of junctions throughout the town to improve safety for all road users. As the active travel measures illustrated in Figure 6-1 of the LTP are delivered, all junctions along the routes will need to be reviewed and upgraded to provide safe access for pedestrians and cyclists. Exact details on proposed upgrade works will be defined at the individual project level. This section of the road network is also under consideration as part of the N24 Waterford to Cahir scheme to identify a sustainable transport solution that supports the multi-modal needs of the corridor at a local and regional level.

### Recommendation

No alterations recommended to the Draft LAP or LTP

<b>Submission Number:</b>	<b>Submission Name:</b>
66	Karen Ferris

### Submission Summary

- i. Welcomes the Draft Clonmel Local Area Plan, including the proposed sustainable travel options, protecting the medieval heritage of Clonmel, and development opportunities across the town and hinterland.
- ii. The submission calls for a specific plan to increase the vibrancy, attractiveness and offering of the main street, from West Gate to St. Peter & Paul's Church. The submission suggests redevelopment around the White Memorial Theatre and towards Old St Mary's Church as well as addressing the vacancy at Market Place and the Arms Hotel site.
- iii. In order to meet the needs to the increasing population, the submission requests that land is made available to local clubs to acquire new amenity space or consideration is given to zoning some of the land at Ballingarrane to amenity. The submission suggests that a vibrant GAA sporting centre in the town would serve as a great amenity.

- iv. Requests that the plan designates a particular area in Clonmel to provide housing that meets the needs of the elderly and suggests Irishtown as a suitable location.

### **Consideration**

- i. The points made in respect of sustainable travel, protection of the medieval heritage and development opportunities are noted and welcomed.
- ii. It is considered that the suite of policies and objectives under Chapter 3 'Town Centre Strategy', along with relevant Active Travel Measures and Public Realm Upgrades identified in the Draft LTP give sufficient effect to the objective to seek to ensure that the vibrancy and vitality of the town is maintained and enhanced.

Vacancy in Clonmel and the need to tackle same together with the existing condition and need for re-development of Market Place and Clonmel Arms is strongly supported under the Draft LAP under Section 3.2, Section 3.3, Policy 3.1, Policy 3.2 and Objectives 3C to 3E).

- iii. The Draft LAP allocated Employment zoning to the Ballingarrane landbank and identifies same as a Strategic Employment Site. This is in accordance with the designations for Ballingarrane in higher tier Plans (Regional Spatial and Economic Strategy for the Southern Region 2020 and Tipperary County Development Plan 2022).

Section 4.3.1 and Policy 4.3 of the Draft LAP notes that the Ballingarrane Masterplan applies to development within the campus. The Masterplan document sets out a vision for the lands to develop in a series of Precincts. Precinct 1 is centrally located within the Ballingarrane Campus and the site-specific requirements for same (page 19 of the Masterplan) states as follows:

- This precinct will function as the hub or heart of the estate. Uses to be provided within the "hub" include administrative/ management operations, networking facilities, start-up/innovation units and a central open space/recreational facility.
- The lands to the south of the ornamental garden will be developed as playing pitches for use by Campus occupants and the general public.

The development of playing pitches in Precinct 1 is provided for within the Ballingarrane Masterplan, with an area of 3ha identified for same.



iv. It is considered that Objective 2G and Policy 6.3 of the Draft LAP is sufficient to support suitable accommodation and facilities for older people.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

67

**Submission Name:**

Kate Acheson

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

68

**Submission Name:**

Edel O’Gorman

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1

### **Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b>	<b>Submission Name:</b>
69	Niall J. Dennehy

### **Submission Summary**

The following points are made in the submission:

- i. The Draft LAP policy on houses in the 'Town Environs' is overly restrictive.

The submission acknowledges that haphazard development of one-off house will impact negatively on future use of lands but the restriction needs to be finely tuned.

Potential for buffer zone around lands zoned Employment, General Industry or Strategic Employment.

Remainder of Town Environs to align with Tipperary County Development Plan 2022-2028, that single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

- ii. Appendix 2 Clonmel Local Transport Plan, Section 2.11

The proposal under AT34 to formalise the link between Inislounaght and Old Toberaheena is to be welcomed.

Re-opening of the link between Inislounaght and New Toberaheena to be examined, this was closed a number of years ago. Re-opening this link, in conjunction with AT-12 would enhance connectivity between Cahir Road and the Clonmel to Marlfield Greenway.

- iii. Appendix 2 Clonmel Local Transport Plan, Section 6.2.1

Active Travel measures AT53 and AT87b will benefit pedestrians and cyclists traveling to/from Powerstown School. Questioned whether the works include for crossing of the N24.

Recommended that safe route to school planned at the Loreto Secondary School is extended to include the junction between Mountain Road and Old Spa Road.

iv. Appendix 2 Clonmel Local Transport Plan, Section 6.2.5-

Section 6.2.5 does not reference land zoned within the Clonmel Environs of the Waterford City and County Development Plan 2022-2028. The Clonmel LAP should seek to enhance connectivity to these lands with segregated cycle and pedestrian facilities.

The Waterford City and County Development Plan 2022-2028 contained objective CLED-05, which is for a proposed road from Old Spa Rd to Coleville Rd. If implemented this would see additional traffic arriving at the Mountain Rd/Old Spa Road junction. Recommended to add an objective to improve the Mountain Rd/Old Spa Rd junction through construction of a mini-roundabout with traffic calming. This would require the acquisition of land from adjoining properties to provide a mini roundabout.

The Safe Route to Schools works planned at Loreto Secondary School, Raheen College & Central Technical institute as shown in Figure 3 could be expanded to include this junction.

### **Consideration**

The points made in the submission will be addressed in the order in which they are presented.

- i. See response to Submission No. 1
- ii. The positive comments in relation to the proposed permeability link in Inislounaght (AT34) are welcomed. Whilst the LTP outlines a number of permeability proposals, this is not an exhaustive list. The LTP is generally supportive of any permeability improvements which can provide greater accessibility for pedestrians and cyclists. The delivery of these measures would need to be considered in consultation with local residents.
- iii. In relation to crossings of the N24 at St. Patrick's Road, the measures proposed in the LTP are at a strategic level in accordance with national and regional policies. As the active travel network is delivered throughout the town, this will include pavement improvements, additional crossings and junction upgrades where deemed necessary to provide safe access for pedestrians and cyclists.

The delivery of crossing facilities on the N24 is somewhat reliant on the outcomes of the N24 Waterford to Cahir study which aims to identify a sustainable solution that supports the multi-modal needs of the corridor at a local and regional level. It is a recommendation that further assessment is undertaken on the delivery of active travel facilities along/across the N24 around Clonmel to deal with the short to medium term measures needed for the sustainable growth of the Town on identification of the Emerging Preferred Solution for the N24 Waterford to Cahir study.

- iv. The points in relation to the upgrade and traffic calming of the route south of Loreto Secondary School to the Mountain Road/Old Spa Road junction are welcomed. The LTP will be updated to include a recommendation for traffic calming and junction upgrades at Mountain Road and the Old Spa Road.

### **Recommendation**

1. Amendment to Draft LAP is recommended. See Amendments 20 and 21.
2. Update Active Travel network maps in the LTP to include proposed traffic calming along the R678 between Hillview and Raheen Road and the proposed traffic calming along the Old Spa Road. Recommendation to be added to Table 6-2 of the LTP (See Amendment 71 in Part 2)

<b>Submission Number:</b>	<b>Submission Name:</b>
70	Suzanne Moran

### **Submission Summary**

The submission raises concerns with the amount of empty buildings in the town and the need to get more shops into the centre of the town. To this end a rates reduction for new and existing businesses is suggested.

The submission raises concerns with water outages and the impact on business and staff, parking charges, the amount of people begging, safety and the condition of a signpost at the end of Haywood Rd.

The submission outlines a need for public toilets in the town, a coffee hub at Kickham Plaza and the need to redevelop Market Place and the Clonmel Arms.

### **Consideration**

Vacancy in Clonmel and the need to tackle same together with the existing condition and need for re-development of Market Place and Clonmel Arms is strongly supported under the Draft LAP under Section 3.2, Section 3.3, Policy 3.1, Policy 3.2 and Objectives 3C to 3E).

The Draft LAP strongly supports a Town Centre First approach where new retail uses are directed to the Urban Core area.

The matters of the development of public toilets, water outages, rates, parking charges, people begging and safety are outside the remit of the LAP to address. The zoning framework provided under the Draft LAP would facilitate a coffee shop at Kickham Barracks.

### **Recommendation**

No changes recommended on foot of this submission.

<b>Submission Number:</b>	<b>Submission Name:</b>
71	Gerard & Ian Byrne

### **Submission Summary**

The submission relates to 21 Mitchell Street, Clonmel Co. Tipperary and comprises a Conservation Appraisal of the building that includes commentary of the Draft LAP. The submission requests that the building is removed from the Councils Record of Protected Structures (RPS). The submission notes that:

- The building owners support the range of objectives in the Draft LAP that promote the regeneration of the Urban Core of Clonmel.
- The owners are cognisant of the importance of retaining positive historical and architectural features that contribute to the built heritage of Clonmel.
- The owners consider the building inclusion on the RPS presents an obstacle to the optimal use of all parts of the building in line with the Draft LAP.

The inclusion of the site within an ACA provides ample protection for the buildings remaining features of interest.

**Consideration**

The points made in the submission are noted. The removal of a structure from the RPS cannot be undertaken as part of the LAP process. It is subject to a separate statutory process in line with the provisions of Chapter 1 of Part IV of the Planning and Development Act 2000, as amended.

The RPS for Clonmel is being reviewed as part of a separate statutory process. The submission made will be provided to the Council's conservation consultant for consideration as part of this process.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

72

**Submission Name:**

Declan O'Brien

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b> 73	<b>Submission Name:</b> Denis & Joan O'Brien
<b>Submission Summary</b> <p>The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.</p>	
<b>Consideration</b> <p>See response to Submission No. 1</p>	
<b>Recommendation</b> <p>Amendment to Draft LAP is recommended. See Amendments 20 and 21.</p>	

<b>Submission Number:</b> 75	<b>Submission Name:</b> Cllr. Siobhán Ambrose
<b>Submission Summary</b> <p>The submission relates to Section 2.0, Planning and Development Strategy of the Draft LAP, specifically Objectives 2C and 2E, and makes the following points:</p> <ol style="list-style-type: none"><li>i. The submitter has highlighted the need for student accommodation in Clonmel via Notice of Motion number 2583</li><li>ii. Objective 2E to also reference students from the Tipperary ETB and Tipperary University Hospital.</li><li>iii. The need for affordable housing in Clonmel as outlined Objective 2C is noted. The need was highlighted by a Notice of Motion made by the submitter.</li><li>iv. Details of an Affordable Housing Scheme in Clonmel will be rolled out in the coming months</li></ol>	
<b>Consideration</b> <ol style="list-style-type: none"><li>i. The point made regarding the need for student accommodation is noted.</li></ol>	

- ii. The wording of Objective 2E can be amended to reference the demand generated by the Tipperary ETB and Tipperary University Hospital.
- iii. The points made regarding the need for affordable housing is noted.
- iv. The Draft LAP is supportive of the delivery of affordable housing in Clonmel and the rollout of an Affordable Housing Scheme for Clonmel is welcomed.

### **Recommendation**

It is recommended that the following is undertaken:

- 1. Amend Objective 2E to include reference to the student housing demand generated by Tipperary Education and Training Board and Tipperary University Hospital (See Amendment 9 in Part 2).

<b>Submission Number:</b>	<b>Submission Name:</b>
76	Cllr. Siobhán Ambrose

### **Submission Summary**

The submission relates to Section 3.0, Town Centre Strategy of the Draft LAP, and states:

- i. Re-development of over shop units into apartments would be a major catalyst providing a boost to the day and night town centre economy.
- ii. Role of Council Vacant Homes Officer to be acknowledged in this section as they are driving this initiative and engaging.
- iii. Application by Council to Department for second Vacant Homes Officer to be acknowledged.
- iv. Role of Council Local Enterprise Office to be acknowledged in this section, same provide first hand support and advice to retailers on many issues including existing government grants, initiatives and policy.

### **Consideration**

The points made in the submission will be addressed in the order in which they are presented.



- i. The point made regarding re-development of vacant space over shop units into apartments is noted and welcomed. The potential of re-purposing vacant upper floors for new uses (including residential) is supported under Section 3.3.2 of the Draft LAP, as are the benefits of such repurposing.
- ii. The point made regarding the role of the Council's Vacant Homes Officer (VHO) is noted. While the Draft LAP does not contain direct reference to the work of the Vacant Homes Officer, Section 3.3.1 and Objective 3C of the Draft LAP references the supports offered by the Council through its planning, housing and local enterprise services to regeneration of vacant property. This is considered adequate and direct reference to the role of the Vacant Homes Officer is not considered warranted.
- iii. It is not appropriate to reference a matter relating to staff resources in a Local Area Plan.
- iv. See reply to point ii) above. Section 3.3.1 and Objective 3C of the Draft LAP references the supports offered by the Council through its planning, housing and local enterprise services to regeneration of vacant property.

#### **Recommendation**

No changes recommended on foot of this submission.

<b>Submission Number:</b>	<b>Submission Name:</b>
77	Cllr. Siobhán Ambrose

#### **Submission Summary**

The submission relates to Section 4.0, Economic Development Strategy of the Draft LAP.

The submission states/requests that:

- i. Tipperary university Hospital to be named as a major employer alongside other companies listed. Funding of €75 million sanctioned for hospital last May which will generate significant increase in jobs when rolled out.
- ii. Reference to be made in this section and in Draft LAP to fact that Clonmel is a University Town.

- iii. Regarding strong demand for warehousing that the section include reference to Council examining lands around existing serviced business parks/sites to identify suitable landbanks for warehousing purposes.
- iv. Reference to be made to plans to extend the Blueway to link with the Waterford Greenway.
- v. Expansion and promotion of Arts and Culture benefits new and existing artists and also offers revenue boost to Clonmel's local economy.

### Consideration

The points made in the submission will be addressed in the order in which they are presented.

- i. Tipperary University Hospital can be named as a significant employer in Section 4.0 of the Draft LAP.
- ii. The Draft LAP references the university status of Clonmel at the following sections:
  - Second last paragraph of Section 4 states *"The new Technological University of Shannon: Midlands Midwest (TUS) has a significant presence in the town giving Clonmel a prestigious technological university town status"*.
  - Last bullet point under section 4.1.1 states *"Third level town with TUS campus, with plans for relocation to town centre site at Kickham Barracks"*.
  - Section 5.4.2 states *"The new Technological University of Shannon: Midlands Midwest (TUS) has a significant presence in the town giving Clonmel a prestigious technological university town status"*.
  - Second last paragraph of Section 5.4.4 states *"Clonmel is served by a number of HSE funded facilities, including Tipperary University Hospital on Western Road, which provides acute general and maternity services."*
- iii. The Draft LAP (taking account of Amendment 84 and 85 in Part 2) contains 255.17ha of available lands zoned for Employment use that can accommodate warehousing, particularly noting land at Gurtnafleur and Ard Gaoithe. Having regard to the OPR submission (no. 102) the quantum of available land is considered sufficient to meet demand for the lifetime of the LAP.

- iv. The proposed link between the Suir Blueway and Waterford Greenway is acknowledged under Objective 14C of the Tipperary County Development Plan 2022 (TCDP) and therefore not repeated in the Draft LAP. Policy 1.1 of the Draft LAP notes that the provisions of the TCDP will apply in conjunction with the LAP.
- v. The benefit of Arts and Culture to the economy and vibrancy of Clonmel is acknowledged under Section 4.3.1 of the Draft LAP.

### **Recommendation**

It is recommended that the following is undertaken:

1. Section 4.0 is amended to include reference to Tipperary University Hospital as a major employer (See Amendment 15 in Part 2)
2. In respect of Employment land, refer to the response to Submission 95 and see Amendment 56, 61, 66 and 84 in Part 2.

<b>Submission Number:</b> 78	<b>Submission Name:</b> Cllr. Siobhán Ambrose
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### **Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028 and Regional Spatial and Economic Strategy (RSES) for the Southern Region, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

### **Consideration**

See response to Submission No. 1

### **Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b> 79	<b>Submission Name:</b> Cllr. Siobhán Ambrose
<b>Submission Summary</b> <p>The submission relates to Section 6.0 Transport and Connectivity of the Draft LAP.</p> <p>The submission states/requests that:</p> <ol style="list-style-type: none"><li>i. The rollout of the N24 is vital from an economic, social and tourism perspective for Clonmel and South Tipperary.</li><li>ii. Additional signage for Clonmel to be included on motorway signage including parts of the N24.</li><li>iii. Clonmel has a poor rail service. persons currently wishing to use the train have to travel to either Thurles or Kilkenny in order to avail of a proper service.</li><li>iv. Rollout of new Town Bus Service welcomed. A further bus rollout to be planned to provide a service that would connect with rural villages in the District.</li><li>v. The need for the rollout of additional EV Charging stations around the Clonmel should also be included in this section.</li></ol>	
<b>Consideration</b> <p>The points made in the submission will be addressed in the order in which they are presented.</p> <ol style="list-style-type: none"><li>i. The Draft LAP under Section 6.4, Policy 6.5, Policy 6.6 and Objective 6G recognises the importance of the N24 upgrade to Clonmel and supports the delivery of same.</li><li>ii. The inclusion for Clonmel on road signage along motorway intersections at locations such as those suggested in the submission is outside the remit of the LAP. This matter can be pursued separately through the Council's Roads Directorate.</li><li>iii. Whilst the delivery of enhanced rail services is not within the scope of the Local Transport Plan, Tipperary County Council will work proactively with Irish Rail and the NTA to improve timetabling and frequency on the Limerick to Waterford line to further increase the impact and appeal of the Clonmel Train Station. The recently published draft All Ireland Rail Strategy which is out for public consultation, also includes for additional services along the Limerick to Waterford line.</li></ol>	

The existing rail service limitations and need for improvement in same is acknowledged under Section 6.0 and Section 6.2 of the Draft LAP. Objective 6B sets out an objective to explore improvements to the rail service.

- iv. The town bus service in Clonmel being rolled out by the NTA is due for implementation in late 2023. The demand for the bus service will be monitored periodically, and improvements made to the frequency and routing as necessary as the demand arises as deemed appropriate by the NTA.

The LTP also supports the roll-out of the National Transport Authority's Connecting Ireland Rural Mobility Plan which aims to increase transport connectivity for people living in Rural Ireland. The plan aims to improve mobility in rural areas, and it will do this by providing better connections between villages and towns by linking these areas with an enhanced regional public transport network connecting cities and regional centres nationwide.

Objective 6C of the Draft LAP sets out an objective to explore improvements to the bus service and infrastructure serving Clonmel.

- v. Volume 3, Appendix 6 Development Management Standards of the TCDP 2022-2028 sets out EV charging infrastructure requirements that apply to development within the Clonmel LAP area. Application of these standards will ensure additional rollout of EV Charging infrastructure as part of new development.

### Recommendation

No changes recommended on foot of this submission.

<b>Submission Number:</b>	<b>Submission Name:</b>
80	Cllr. Siobhán Ambrose

### Submission Summary

The submission relates to Section 7.0 Recognising our Local Heritage of the Draft LAP.

The submission requests that the appointment of a Conservation Officer is included as part of this Section of the LAP. The submission notes that a dedicated Conservation Officer would

greatly support the owners of protected structures and in turn ensure the preservation of the extensive number of protected structures in Clonmel and around the County.

**Consideration**

The points made in the submission are noted. Matters relating to staff resources do not come under the remit of a Local Area Plan.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

81

**Submission Name:**

Cllr. Siobhán Ambrose

**Submission Summary**

The submission relates to subsection 8.1 Energy Demand and Renewable Energy of Section 8.0 Infrastructure, Energy and Utilities of the Draft LAP.

The submission requests that it be included in this sub-section of the LAP that Tipperary County Council would engage with large companies in the Clonmel Area regarding the potential use for these companies to use renewable energy measures like solar panels or windmills with a view to both cutting their energy costs and being environmentally friendly.

**Consideration**

The point made in the submission is noted. The purpose of the Local Area Plan is to provide a framework to guide development and to set policies and objectives against which development would be assessed.

Regarding renewable energy development Policy 8.1 of the Draft LAP supports the use of renewable energy technologies at all scales and supports the principle of on-site energy generation. In addition, the TCDP contains a number of Policies and Objectives under Section 10.9 and 10.10 that support renewable energy development at all scales and support enterprises addressing climate change (Policy 10-5, Objective 10-A, 10-C & 10-I).

It is considered that the action outlined in the submission would best be addressed by the Tipperary Energy Agency (TEA) and /or Sustainable Energy Authority Ireland (SEAI). The latter body administers renewable energy grants to home owners, businesses and community groups and can provide technical advice on energy reduction.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

82

**Submission Name:**

Cllr. Siobhán Ambrose

**Submission Summary**

The submission relates to Section 8.0 Infrastructure, Energy and Utilities of the Draft LAP.

The submission requests that it be included in this section that Tipperary County Council would engage with local schools and the farming community with respect to the possibility of installing solar panels or windmills. These groups may be unaware of available grants.

**Consideration**

The point made in the submission is noted. The purpose of the Local Area Plan is to provide a framework to guide development and to set policies and objectives against which development would be assessed.

Regarding renewable energy development Policy 8.1 of the Draft LAP supports the use of renewable energy technologies at all scales and supports the principle of on-site energy generation. In addition, the TCDP contains a number of Policies and Objectives under Section 10.9 and 10.10 that support renewable energy development at all scales and support enterprises addressing climate change (Policy 10-5, Objective 10-A, 10-C & 10-I).

It is considered that the action outlined in the submission would best be addressed by the Department of Agriculture, Food and the Marine (DAFM) and/or TEA and the SEAI. The DAFM administers grants to farms for Solar PV installations. The SEAI administers renewable energy grants to schools.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

83

**Submission Name:**

Cllr. Siobhán Ambrose

**Submission Summary**

The submission relates to Section 9.0 Land Use Zoning Framework of the Draft LAP.

The submission requests, in view of the lack of small, medium and large warehousing around the Clonmel area, that the Council examine lands surrounding the current serviced business sites/parks with a view to identifying suitable land banks suitable for warehousing purposes.

**Consideration**

The point made in the submission is noted. See considerations to submission no. 77.

**Recommendation**

See recommendation to submission no. 77.

**Submission Number:**

84

**Submission Name:**

Aine Purcell

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1



### Recommendation

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b>	<b>Submission Name:</b>
87	SLR Consulting, on behalf of Medite DAC

### Submission Summary

The submission makes the following points regarding the Draft LAP and lands owned by MEDITE:

- i. MEDITE facility at Redmondstown has an area of 62 ha, operates 24/7 and employs over 170 people and is a significant employer to Clonmel and wider sub region.

MEDITE is of strategic economic importance to Clonmel, the Southern region and the State by virtue of its role as large industrial employer, extensive regional supply chain and the high value of product which is exported to the UK and Europe.

The General Industry zoning of the site and policy support for heavy industry is welcomed by MEDITE DAC.

- ii. The thermal energy required to produce MDF in MEDITE is currently provided by three biomass boilers/heaters and one gas fired heater. MEDITE is intending to replace same with two new state of the art biomass-fired energy plants, one for each of MEDITE's production lines. This will see the introduction of modern systems using best available technology, will increase the competitiveness and efficiency of MEDITE's manufacturing plant and will allow MEDITE to reduce its carbon emissions.

The proposal 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 with Environmental Impact Assessment Report is to be submitted by Q4 2023.

- iii. The submission notes and supports the emphasis on Active Travel in the Local Transport Plan, in particular the provision of segregated cycle infrastructure. The submission recommends that the speed limit on the N24 be extended to include the Redmondstown

junction such that the N24 from this point westwards to the town centre is enhanced as a shared environment for cyclists while maintaining its transport function. This measure will enhance non-care access to a large employer and provide benefits to the operation of the junction.

- iv. Regarding the N24 and Clonmel Link Road 4 the submission notes that 3 of the N24 off-line options retain a node, and potentially an interchange, with the new road alignment to the north of the MEDITE holding, as well as the retention of the Clonmel Road Link 4 scheme (Figure 6-7 of the Draft Transport Plan). The submission notes that 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 MEDITE plant in association with either the Clonmel Road Link 4 scheme or the potential interchange. 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 MEDITE operation and traffic activity to and from the plant.
- v. Regarding the foregoing point MEDITE wish to be consulted on future traffic and layout modelling for any road schemes that involve the plant site.
- vi. The submission confirms that operational traffic will increase should the planned development (as outlined in point iii go ahead), that a traffic assessment has been undertaken as part of the application process and requests that this is taken account of in any future modelling work on Link Rd 4 or any N24 interchange.
- vii. The full extent of the site and economic development constraint to be factored into any detailed design work on Link Rd 4. Any future corridor must respect MEDITE site boundary and be drawn outside same.

#### Consideration

- i. The economic importance of MEDITE to Clonmel and the wider sub region is acknowledged, as is the nature and scale of the MEDITE enterprise and its importance as a large industrial employer.

The Draft LAP has sought to support the continued operation of MEDITE through zoning of the lands on which same is located and surrounding lands for General Industry use. The submission acknowledges the zoning and policy support.

ii. The proposal by MEDITE to make a planning application through the Strategic Infrastructure Development (SID) process for a new bio-mass fired energy plant is noted. It is noted that this new infrastructure will see the introduction of modern systems using best available technology, will increase the competitiveness and efficiency of MEDITE's manufacturing plant and will allow MEDITE to reduce its carbon emissions.

iii. With respect to dedicated active travel infrastructure and the recommendation in relation to speed limit reductions on the N24, these measures are currently under review as part of the option selection process for the N24 Waterford to Cahir study. This stage of the project is due for completion by the end of 2023. A further public consultation on these proposed measures will take place following completion of this stage of the project. Further information is available on the project website <https://n24waterford2cahir.ie>

A pavement scheme is planned for the N24 section from Moangarriff Rd to Twomilebridge with initial design and planning stage scheduled for Q4 /2023/ Q1 2024. Roll out of this scheme is subject to funding and resource allocation and the identified timelines are provisional. Matters such as segregated cycleways and safety measures will be examined as part of this scheme. The provision of segregated cycle facilities east of the Moangarriff roundabout is identified as a key active travel intervention in the Draft Local Transport Plan.

iv. The examination of potential new road links to the N24 corridor is currently being examined as part of the N24 Waterford to Cahir option selection process and all relevant information relating to this project can be found at the project website <https://n24waterford2cahir.ie>.

### Recommendation

No changes recommended to the draft LAP or LTP

<b>Submission Number:</b>	<b>Submission Name:</b>
89	Sarah Conway

### Submission Summary

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

Allowing a 'social need' would align the policy with the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES) for the Southern Region, and Tipperary County Development Plan 2022-2028.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

97

**Submission Name:**

William Trehy

**Submission Summary**

1. The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.
2. The policy does not align with Waterford County Development Plan in that social need is acceptable in the environs of Clonmel

**Consideration**

1. See response to Submission No. 1
2. In response to the point made in respect of the Waterford side of the river, it should be noted that Chapter 7 of the Waterford City and County Development Plan 2022-2028 states that for the 'High Amenity' zone, rural houses will be considered where the applicant has a genuine demonstrable economic, social or local need for a first home

for their own permanent occupation, but in all cases, where the applicant is an existing landowner.

### **Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b>	<b>Submission Name:</b>
100	Cllr. Siobhán Ambrose

### **Submission Summary**

Referring to Section 5.3 of the Draft LAP 'Open Space & Amenities', the submission requests that the LAP identify potential sites within the Clonmel area for local sports clubs who wish to either expand their entire club and relocate to a bigger site or alternatively to identify potential available sites for other clubs who may want to stay where they are but who would be interested in benefiting from additional pitches or grounds for their members.

### **Consideration**

i. The Draft LAP allocates Employment zoning to the Ballingarrane landbank and identifies same as a Strategic Employment Site. This is in accordance with the designations for Ballingarrane in higher tier Plans (Regional Spatial and Economic Strategy for the Southern Region 2020 and Tipperary County Development Plan 2022).

Section 4.3.1 and Policy 4.3 of the Draft LAP notes that the Ballingarrane Masterplan applies to development within the campus. The Masterplan document sets out a vision for the lands to develop in a series of Precincts. Precinct 1 is centrally located within the Ballingarrane Campus and the site-specific requirements for same (page 19 of the Masterplan) states as follows:

- This precinct will function as the hub or heart of the estate. Uses to be provided within the "hub" include administrative/ management operations, networking facilities, start-up/innovation units and a central open space/recreational facility.
- The lands to the south of the ornamental garden will be developed as playing pitches for use by Campus occupants and the general public.

The development of playing pitches in Precinct 1 is provided for within the Ballingarrane Masterplan, with an area of 3ha identified for same.

- ii. The Draft LAP allocates the 'Community Services and Infrastructure' zone to c. 25 hectares of land northwest of the junction between the N24 and Heywood Road. Under the zone, 'Sports /Leisure Facilities' is a use which is 'Open for Consideration'. This landbank has the potential to provide additional playing pitches and other facilities for existing and new sports clubs in the future.

### **Recommendation**

No changes recommended on foot of this submission.

<b>Submission Number:</b>	<b>Submission Name:</b>
105	Myriam Madigan

### **Submission Summary**

The following points are made in the submission regarding policies and objectives of the Draft LAP:

- i. Policy 1.1-The Tipperary County Development Plan 2022-2028 may need to be reviewed and updated.
- ii. Policy 2.1- Requirement for retrofitting of existing structures on brownfield sites supported and request that Council stand firm on this policy. Brownfield sites favoured for development above greenfield sites.
- iii. Policy 2.3-Requirement for low-carbon/energy efficiency within new developments supported. Also urge for greater inclusion of nature/biodiversity with native plants. Areas to be grassed and not paved over. This allows feeding opportunities for insects/birds and rainwater soakage.
- iv. Policy 2.5- Recommend that considerably greater care is taken with regard to the visual aspects and character of developments within existing areas.
- v. Objective 2C/D- Recommend that greater care with regard to the location of new developments. Surprised with location of new LIDL development at Queen Street when

space would have been suitable for residential development for older residents. LIDL decision conflicts with Objectives 2C and 2G. Concern with usefulness/accuracy of any Draft Plan.

- vi. Objective 2G- Market Square is perfect location for conversion into comfortable homes and this area should be used for homes and not for commercial use. Restrictions to be laced on further commercial development . Area must be tastefully designed. Area has potential to be prize winning space.
- vii. Policy 3.1-Strongly support the re-use of vacant and underused sites within the urban core, with the very strong provision that care is given to the character of the area.
- viii. Policy 3.5- Where vandalism occurs repairs must be carried out immediately. Disappointment regarding condition of town centre noted.
- ix. Policy 3.6- Provisions of this Policy supported.
- x. Policy 3.9- Provisions of this Policy supported. Confused with how new coffee shop on Parnell St was permitted to destroy original window and replace same with metal door. Café to eb required to revert to the original set up with cost borne by the Council.
- xi. Objective 3D-Care to be taken with overcoming planning obstacles, same not to be done in manner that removes character from a property.
- xii. Objective 3F-Care to be taken with design of the structure. The elegance, style and character of same are of equal importance.
- xiii. Objective 3H/3I- Concept of painting and art to improve streetscapes supported. Concerns as outlined in commentary on Policy 3.5 reiterated.
- xiv. Objective 3J- Strongly recommend as high a degree as possible be given to biodiversity education within the garden, with native planting as much as possible.
- xv. Objective 3M-Strongly object to proposal to develop new library. Relocation of library to Kickham Barracks and re-use of existing building for other use would make sense.
- xvi. Policy 4.3-Recommend a review of the land use at Ballingarrane with significantly more land being kept for nature and parkland. Additional industry and pollution not required. Focus should be on environment and not economic growth. Proposal will only attract carbon and traffic to the area.

- xvii. Policy 4.4-Caution with tourism, as same can extend into over-tourism.
- xviii. Policy 4.5- Tasteful renovation of Clonmel Arms would be welcomed. Something close to Cashel Palace would be welcomed. Re-use of existing materials is a priority.
- xix. Objective 4C-As per commentary to Policy 4.3 review to Ballingarrane lands recommended. Employment does not need to be strengthened.
- xx. Objective 4G- Increased events, festivals street music supported. O'Connell Street to be closed from Holland and Barrett to corner of Mary St on Saturdays and the Saturday fruit and vegetable market to be moved to O'Connell Street.
- xxi. Objective 4H- More life at night welcomed. Safety must be maintained.
- xxii. Objective 4J-Care to be taken with developing a museum in West gate.
- xxiii. Policy 5.4- Character, beauty and kerb appeal to be considered for al new developments and retrofits.
- xxiv. Objective 5B- Support opportunities for allotments, community gardens, with a note of caution regarding the concept of food foraging.
- xxv. Section 6.3.1-Spport improvements to pedestrian and cycle routes and recommended the reduction of building new roads.
- xxvi. Section 6.4- Road Link 1 should be for pedestrians/cyclists and not for motorists.
- xxvii. Policy 6.1- This policy is supported.
- xxviii. Objective 6B- This objective is supported.
- xxix. Policy 7.1-Biodiversity of the River Suir must be protected, enhanced and given top priority.
- xxx. Policy 7.2- Retention of mature trees is vitally important plus more greening of urban areas required- Object to removal of mature trees in Clonmel. Trees provide benefits of shade, shelter and drainage, carbon capture and beauty. Council has not agreed to review of plans to remove mature trees from town centre.
- xxxi. Policy 7.4- Views and streetscapes are vitally important.
- xxxii. Objective 7C-Supportive of proposal to widen/improve Blueway but same to be done in manner that minimises removal of linear woodland/hedgerow.



- xxxiii. Objective 7D-Idea is welcomed. Double amount of trees/hedgerow to be planted than removed.
- xxxiv. Objective 7F-Tree strategy is desperately needed and long overdue.
- xxxv. Objective 8A- Council needs to address issues of water supply in Clonmel urgently.

### **Consideration**

The points made in the submission are noted. The considerations regarding same are as follows:

- i. Policy 1.1-The Tipperary County Development Plan 2022-2028 has been recently reviewed with a new plan coming into effect on the 22<sup>nd</sup> August of 2022.
- ii. Policy 2.1- The comments regarding favouring development on brownfield sites and requiring retrofitting of existing structures is noted.
- iii. Policy 2.3-The point is noted. Section 7.1.2 of the Draft LAP seeks to encourage biodiversity and urban greening as a natural part of new development and as a measure to support a low-carbon society and build resilience to climate change. Policy 7.2 of the Draft LAP requires that new development incorporate the provision of trees in accordance with Section 3.7 of the TCDP, this section requires planting of native species.
- iv. Policy 2.5-The Draft LAP requires new development to respect the character of the Clonmel.
- v. Objective 2C/D-The LIDL development at Queen Street was assessed against the policies, objectives and standards contained in the Clonmel and Environs Development Plan 2013, as varied and considered acceptable. Application reference PI 21/1098 relates to the LIDL development and the planners report under same will show the planning considerations and assessment to the development. It is not accepted that the LIDL development conflicts with Objectives 2C (provision of affordable housing) and 2G of the Draft LAP (Age Friendly Programme).
- vi. Objective 2G-The Draft LAP identifies Market Place as a Regeneration Site and places particular emphasis on the need for regeneration of same due to its scale, location and relationship with the retail core of Clonmel. The Market Place site is located within the town centre of Clonmel, within the towns Primary Retail Area and the Key Planning

Criteria for the lands under Appendix 3 states that the site *would be suitable for a mixed-use development, with active commercial and / or community uses at ground floor levels and residential above*. The provision for mixed use is appropriate in view of the town centre location of the lands and surrounding land use context.

- vii. Policy 3.1-The point is noted.
- viii. Policy 3.5-The point is noted. The Draft LAP contains a strong Town Centre First focus with policies and objectives to tackle dereliction and vacancy and add vibrancy to the town through enlivening same with new residential and commercial uses. If undertaken increased commercial and residential occupation of the town centre and regeneration of vacant and derelict buildings and sites should serve to increase passive surveillance within the town and reduce anti-social behaviour.
- ix. Policy 3.6-The point is noted.
- x. Policy 3.9. The point made is noted. The Planning Section are investigating planning compliance matters at 12 Parnell Street, Clonmel which is the location of *Coffee Bla Bla Bla* enterprise.
- xi. Objective 3D-The point is noted.
- xii. Objective 3F- The point is noted.
- xiii. Objective 3H/I- The point is noted.
- xiv. Objective 3J-The point made can be given further consider as detailed proposals emerge for Suir Island.
- xv. Objective 3M-The Delahunty Square Public Realm project is a separate project to the Clonmel Library. The concerns highlighted regarding re-development of the library are noted.
- xvi. Policy 4.3-The Draft LAP applies Employment zoning to the lands at Ballingarrane and the lands as a Strategic Employment Location. This is in line with the designations of Ballingarrane in the TCDP 2022-2028 and RSES and the designation of Clonmel as a regional economic driver. A Masterplan has been prepared to guide the location and layout of new development within Ballingarrane and same make provision for maintaining open recreational space within the estate lands.
- xvii. Policy 4.4-The point of concern regarding over tourism is noted.

- xviii. Policy 4.5- Planning permission was granted under PI Ref 18601355 for re-development of the Clonmel Arms site into a new hotel. The development was of a high design quality. To date the permission has not been implemented.
- xix. Objective 4C-The points made are dealt with in the consideration to Policy 4.3
- xx. Objective 4G-The point made is noted.
- xxi. Objective 4H- The point made is noted.
- xxii. Objective 4J-The Clonmel Flights of Discovery Tourism Project includes for the redevelopment of the West Gate into an immersive interpretative experience linked with the other pillars of this project (Museum of Hidden Histories, Dowds Lane Visitor experience and Suir Island). The West Gate is not to be developed into a museum.
- xxiii. Policy 5.4- The point made is noted.
- xxiv. Objective 5B- The point made is noted.
- xxv. Section 6.3.1-The point made is noted. Section 6.4 of the LTP sets out the sustainable transport objectives by which each of the road proposals were assessed. These objectives are aligned with local and national policy in particular the modal and intervention hierarchy set out in NIFTI. But the delivery of these road schemes through the planning process will need to continue to demonstrate adherence to national policy.
- xxvi. Section 6.4- The point made is noted. Road Link 1 will accommodate car, pedestrian and cycle movements.
- xxvii. Policy 6.1- The point made is noted.
- xxviii. Objective 6B-The point made is noted.
- xxix. Policy 7.1 - The point made is noted.
- xxx. Policy 7.2- Implementation of the Clonmel Public Realm Plan will require removal of existing mature trees from their current position. This will be undertaken with care with removed trees to be replanted in Mulcahy Park, where they survive. New trees will be planted as part of the Clonmel Public Realm Plan, same will be appropriate to their urban environment, located and planted correctly and of a species suitable for maintenance requirements.
- xxxi. Policy 7.4-The point made is noted.

- xxxii. Objective 7C- The provision of Policy 7.1 will ensure any improvement of the Blueway will protect the integrity and ecological and biodiversity value of the River Suir.
- xxxiii. Objective 7D-The point made is noted.
- xxxiv. Objective 7F- A Tree Strategy for Clonmel is currently being prepared by the Clonmel Borough District.
- xxxv. Objective 8A-The water supply issues in Clonmel are noted and the Council are in regular contact with Uisce Eireann regarding this matter.

**Recommendation**

No changes recommended on foot of this submission.

**Submission Number:**

106

**Submission Name:**

Eoin Doyle, ARUP

- i. Kilkenny County Council, in partnership with Tipperary County Council, Transport Infrastructure Ireland (TII) and the Department of Transport are developing the N24 Waterford to Cahir project. Arup has been appointed to provide multi-disciplinary technical consultancy services for the delivery of Phases 1 to 4 of the TII Project Management Guidelines for the N24 Waterford to Cahir Project, and are currently finalising Phase 2: Option Selection of the N24 Waterford to Cahir Project, determining the Preferred Transport Solution which could include elements of Active Travel, public transport improvements, Demand Management measures, streets and road infrastructure.
- ii. The submission highlights the strategic importance of the N24 corridor to the Southern Region's transport network and the proper planning and sustainable development of County Tipperary, and to request the acknowledgement of same within the policies and objectives of the final Clonmel Local Area Plan 2024-2030.
- iii. The LAP and LTP will need to be assessed to ensure they complement the Preferred Transport Solution of the N24 Waterford to Cahir Project without any detrimental effects to the strategic route.

- iv. The submission requests clarification that the LTP is referring to the existing N24 Clonmel Inner Relief Road in Table 2-9 in Section 2.13 where reference is made to a "*Town bypass available via the N24*" as it is a baseline assessment.

### Consideration

- i. The point made is noted.
- ii. Section 6.5 of the Draft LAP recognises the strategic importance of national routes. In equal measure, the Draft LAP also recognises the strategic importance of Clonmel as an economic driver for the region, as does the IDA in its submission (no. 104).
- iii. As noted within the LTP, specific active travel measures along and across the N24 have not been identified at the time of preparing the LTP as this will be dependent upon the preferred transport solution of the N24 Waterford to Cahir project. TCC will continue to work collaboratively with TII in the delivery of active travel measures along this corridor which meet the local and national level objectives of both studies
- iv. In relation to Table 2.13 reference concerning the town bypass, it is confirmed that the table is referring to the existing N24 Clonmel Inner Relief Road.

### Recommendation

No changes recommended to Draft LAP or LTP. Also refer to responses made to submission 53 (TII) and 112 (NTA).

<b>Submission Number:</b>	<b>Submission Name:</b>
107	Cllr. Siobhán Ambrose

### Submission Summary

The submission relates to Section 8.0 Infrastructure, Energy and Utilities of the Draft LAP, specifically subsection 8.2.1.

The submission notes the residents and businesses of Clonmel are constantly experiencing problems with the towns water supply. The submission requests that TCC engage with Uisce Eireann with a view to carrying out independent investigative works to determine if there any

possible solutions that can be explored to alleviate interruptions in both the short and long term,

Investigations to include the indefinite retention of the Poulavanogue Water Treatment Plant.

### **Consideration**

The points of concern regarding water supply problems in Clonmel are noted. TCC are in constant engagement with Uisce Eireann regarding the problems experienced and the need for a sustainable water supply for Clonmel.

Uisce Eireann's short term plans for Clonmel are for advancement of improvements to the Glenary Water Treatment Plant in order to reduce risk of outages and Boil Water Notices. These works are scheduled for completion by end of 2023. In tandem customers on Mountain Rd are to be transferred to the Glenary supply to address outages and Boil Water Notices associated with Poulavanogue, 2km of mains rehabilitation are to be undertaken in 2024 in Clonmel.

Medium term plans are to undertake significant upgrades to the Glenary treatment plant (by end 2026) increase abstraction through the Monroe wellfield, upgrade the Monroe treatment plant and mains (by end 2026). In tandem, the Poulavanogue plant is to be rationalised.

### **Recommendation**

No changes recommended on foot of this submission.

<b>Submission Number:</b>	<b>Submission Name:</b>
110	Mattie McGrath, TD

### **Submission Summary**

1. The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

2. LAP needs to support the development of social, affordable and private housing to make Clonmel a more attractive place to live and work in.
3. Emphasis needed to address dereliction of market place.
4. Dereliction and vacancy in town centre needs to be addressed through a joint approach from all sections of council.
5. Investment in water supply is required to ensure security of supply for the town.
6. Zoning at Giantsgrave, Clerihan. Zoning of lands at an in-fill site at Giantsgrave needs to be reviewed. Owners are eager to develop housing but have been prevented due to zoning restrictions. Lack of development of the site has led to anti-social behaviour and a cause of concern to the owners and neighbouring home owners.
7. Refers to anti-social behaviour impacting on the Clonmel Rugby Club.

### **Consideration**

1. See response to Submission No. 1
2. The Draft LAP includes provision for 96.04ha of land zoned 'New Residential'. Referring to the Serviced Land Assessment contained in Appendix 2 of the LAP, the zoning of this land is evidence based, ensuring that only land that is serviced or servicable within the lifetime of the LAP is zoned. This ensures that new residential development can commence in a timely manner. In addition, the Draft LAP supports the provision of new residential development by way of regeneration / development of under-utilised / vacant / derelict town centre sites through the 'Urban Core' and 'Regeneration' zoning alongside the identification of 'Regeneration Sites' in Appendix 3 of the Draft LAP.

It is important to note that there are a significant number of planning permissions granted within the LAP area (See page 19 of Draft LAP) and housing delivery is therefore expected during the lifetime of this LAP.

3. Under the Draft LAP, Market Place is zoned 'Urban Core', a zone which is flexible to town centre type uses, including retail, office and residential. In addition, the property is identified as a 'Regeneration Site' under Appendix 3 to the Draft LAP, along with a set of key planning criteria to assist the landowner with development proposals. Section 3 of the 'Written Statement' states that due to its scale, location and

relationship to the retail core, the Council will place particular emphasises on Market Place, underpinned by Policy 3.1 and 3.2 which seek to support compact growth through the redevelopment of the identified 'Regeneration Sites'.

The Council have engaged with the owners of Market Place regarding re-development of the lands.

4. With reference to the previous point, Section 3.3 of the Draft LAP deals directly with land activation and the strategy for vacancy and regeneration. The LAP includes a suite of policies and objectives which seeks to support reuse / redevelopment of vacant and derelict sites in the town centre.
5. The points made regarding water supply are noted. Objective 8A of the Draft LAP sets out an objective to work in conjunction with Uisce Éireann to promote and facilitate the provision of adequate water infrastructure to serve the needs of the existing and future population of Clonmel.
6. Zoning at Giantsgrave, Clerihan. See considerations to submission no. 11
7. The LAP recognises established land-uses in the vicinity of the Clonmel Rugby Club.

### **Recommendation**

1. Amendment to Draft LAP is recommended. See Amendments 20 and 21.

<b>Submission Number:</b>	<b>Submission Name:</b>
114	Aine & John Cullinan

### **Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

### **Consideration**

See response to Submission No. 1



**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

115

**Submission Name:**

Laurence Martin

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

116

**Submission Name:**

John & Mary O’Gorman

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

117

**Submission Name:**

Brenda & Kevin O'Connor

**Submission Summary**

The Local Area Plan should be consistent with the Tipperary County Development Plan 2022-2028, that for lands zoned "Town Environs," single houses should be permitted on the basis of both an economic and social need, rather than being limited to economic need only.

**Consideration**

See response to Submission No. 1

**Recommendation**

Amendment to Draft LAP is recommended. See Amendments 20 and 21.

**Submission Number:**

120

**Submission Name:**

Chris & Breda Lee

**Submission Summary**

The submission relates to lands located east of the Cashel Road at Ard Gaoithe. The submission notes that their pre-draft stage submission has been taken into consideration.

The submission welcomes the omission of the indicative route/road corridor through their lands that is contained in the current Clonmel & Environs Development Plan.

The submission notes the future development of housing on the lands will be reliant on access to the R688 and this will involve the provision of a suitably designed junction.

The submission notes the provisions of the Draft LAP and Local Transport Plan that relate to active travel linkages between residential areas and key destinations and provision of public

transport services, in particular the provisions that relate to the submitters' lands. The Part 8 proposal for improved cycle lanes on the Cashel Rd is noted in this regard.

The submission raises a concern that the proposed active travel works and proposals set out under the LTP have not taken sufficient account of the need to provide for future access to the submitters' lands. In particular the proposed active travel works has not included provision for a future access capable of accommodating residential development of the lands.

The submission requests that the Draft LAP provide for a suitable access to the lands to avoid any conflict with the Active Travel proposals and to overcome future potential obstacles to developing the lands.

### **Consideration**

The points made in the submission are noted.

Whilst not all road reservations included in the 2013 Clonmel & Environs Development Plan are specifically referenced in the LTP, the proposal for new roads highlighted in the 2013 plan are being assessed as part of the N24 Waterford to Cahir Project and the outcome of this project in terms of a Preferred Transport Solution will be incorporated and supported in the Clonmel LTP/LAP.

Points made in support of proposed active travel measures on the Cashel Road are welcomed.

The Local Transport Plan provides a comprehensive multi-modal transport network across Clonmel considering the requirements of access to all zoned lands. The precise location of new junctions or access points for development lands would normally be considered as part of an individual planning application.

All future development access proposals will need to meet necessary safety standards set out in TII's Design Manual for Roads and Bridges (DMRB), Design Manual for Urban Roads and Streets (DMURS) and other appropriate design guidance. Any development at the proposed lands will need to go through its own planning process to gain permission, at which point the access/egress arrangements for the site will be assessed in detail.

### **Recommendation**

No change recommended to the draft LAP