



Planning Department  
Tipperary County Council  
Limerick Road  
Nenagh  
Co Tipperary

On-line submission portal; <https://consultations.tipperarycoco.ie/>

Dáta | Date  
12 December, 2023

Ár dTag | Our Ref.  
TII23-123894

**Re: Proposed Material Alterations to the Draft Clonmel and Environs Local Area Plan, 2024 – 2030**

Dear Sir/Madam,

The Authority acknowledges and welcomes the Proposed Material Altera arising from consideration of the Authority's initial submission on the Draft Local Area Plan and Local Transport Plan. In relation to other Proposed Material Amendments on display, TII outlines the following observations for the Councils consideration;

#### **Proposed Amendment no. 16 and 18**

TII notes Proposed Amendment to the text associated with the employment lands at Ard Gaoithe Business Park and the Abbott Vascular and Boston Scientific Campuses and the proposal to subject the lands to a Masterplan approach to guide future development.

TII requests that where proposals are subject to Masterplan exercises, appropriate consultation with statutory stakeholders should be undertaken and TII recommends that any adoption process or framework should be clearly identified in accordance with the requirements of official policy concerning such non-statutory frameworks.

#### **Recommendation**

- Where proposals are subject to Masterplan exercises, appropriate consultation with statutory stakeholders should be undertaken and any adoption process or framework should be clearly identified in accordance with the requirements of official policy concerning such non-statutory frameworks.

**Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 140.**

#### **Proposed Amendment no. 20 and no. 21**

TII notes the Proposed Amendments address one-off housing in the Town and Environs area. Proposed Amendment no. 21 includes a footnote that cross references to Development Plan provisions. As the Town and Environs area includes the strategic national road network, TII considers it important to also include reference to Policy 12-4 of the Development Plan and the Council policy to avoid the creation of additional access points to national roads to which speed limits greater than 60kmh apply.

#### **Recommendation**

TII would welcome consideration by the Council of the following:

- Include a cross reference in the footnote to Proposed Amendment 21 of the Draft Plan referring to Policy 12-4 of the County Development Plan in the interests of providing clarification and early assistance to applicants in the preparation of any one-off housing planning application where there may be implications for the strategic national road network in the area.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
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**Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 140.**

**Proposed Amendment no. 47**

TII notes that Proposed Amendment no. 47 proposes introducing a new Policy to the Local Area Plan;

*‘Require that grid connection routing for renewable energy development proposals should avoid materially impacting the road network, where possible’.*

TII’s recommendation in the Authority’s submission on the Draft Local Area Plan advised that the Authority 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.

With regard to the foregoing, TII would highlight that the Authority’s submission only relates to national roads.

**Employment Lands at Ballingarrane**

Although not included in the Proposed Material Alterations, Section 4.2 of the Draft Local Area Plan addresses Clonmel Strategic Employment sites and the strategic importance to the region of the Ballingarrane Business, Science and Technological Campus is evident. The Draft Local Area plan confirms that the site is accessed from the N24 Cahir Road Roundabout.

The N24, national primary road, at this location, is subject to a 100kph speed limit. Therefore, as TII has previously consistently advised, there are significant policy issues to address relating to any intensification of use of this access to ensure proposals are consistent with the relevant specific provisions of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) as well as accessibility, capacity and road safety considerations. 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.

As outlined in TII’s initial submission on the Draft Plan, the Authority 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.

**TII Recommendation**

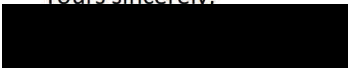
- TII is not aware of any evidence base developed to support the identification of the Strategic Employment Site at Ballingarrane to address the requirements of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). It is considered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

**Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 140.**

**Conclusion**

The Authority respectfully requests that the foregoing observations are taken into consideration by the Council prior to the adoption of the Clonmel and Environs Local Area Plan, 2024 – 2030.

Yours sincerely,



Michael McCormack  
Senior Land Use Planner