

## ► Submission information

Site Reference No.

TYLA00002868

Site Address (if known). Note: map can be uploaded as supporting documentation below

Ardgeeha, Clonmel, E91 EV82.

Your Status

Third Party

Requested action

Exclusion

**Details of Submission Request** 

With regard to the proposed zoning as residential of Michael O'Connell's family farm holding at Ardgeeha, Glenconnor Road, Clonmel, Co. Tipperary (folio reference TY11443F) we make the following submission outlining our objection to the zoning of the land. TCC reference RZLT025, RZLT Parcel ID TYLA00002868 and TYLA00002870.

In accordance with "Residential Zoned Land Tax - Guidelines for Planning Authorities June 2022" in order for lands to be considered to be zoned as Residential "it is reasonable to consider that the lands may have access or be connected to services." Michael O'Connell's land does not currently have access to existing services. It would require access to third party

lands to connect the land to these services, there is no guarantee of agreement for accessing or purchasing these lands without a Compulsory Purchase Order and therefore Michael O'Connell's land should not be zoned residential.

A key factor in determining if land should be zoned for Residential Zoned Land Tax is that "land must be connected to, or have access to public infrastructure and facilities necessary for dwelling to be developed and with sufficient service capacity available for such development". If Michael O'Connell's land to be developed it would have to connected to the Clonmel Wastewater Treatment Plant. Capacity does not exist in the Clonmel Wastewater Treatment Plant if this site was to be developed as the current available capacity will be filled by the numerous housing estates under construction or for sale or that have been moved into since the EPA report in 2021.

The EPA assessed the Clonmel Wastewater Treatment Plant to have Peak Hydraulic Capacity of 24,912 m3/day. In 2021 the Current Hydraulic Load annual max was 23,400m3/day. At 2021 levels of housing and industry directed to the Clonmel Wastewater treatment plant an excess hydraulic capacity of 6.07% was available. An increase since 2013 (16,655m3/day) of more than 40% when there was low levels of house building. Many hundreds of houses have been occupied, constructed, partially constructed, granted planning permission and have applied for planning permission in Clonmel in the intervening period since the EPA report in 2021 and today. The 6.07% excess capacity has long since been used up. An Atkins Engineering report on the WWTP noted the inflow from "brewing, meat processing, tanning and milk related industries" to the plant as "exceptionally high" with "double the average values for normal municipal sewage". The Clonmel WWTP outfalls to the River Suir Special Area of Conservation as identified by the National Parks and Wildlife Service with the following qualifying interests: Atlantic salt meadows (Glauco-Puccinellietalia maritimae), Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation, Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels, Old sessile oak woods with Ilex and Blechnum in the British Isles, Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae), Taxus baccata woods of the British Isles, Margaritifera margaritifera (Freshwater Pearl Mussel), Austropotamobius pallipes (White-clawed Crayfish), Petromyzon marinus

(Sea Lamprey), Lampetra planeri (Brook Lamprey), Lampetra fluviatilis (River Lamprey), Alosa fallax fallax (Twaite Shad), Salmo salar (Salmon), and Lutra lutra (Otter).

It is clear that there is not sufficient capacity for the existing non occupied, partially constructed and planned housing in the Clonmel area in the existing Wastewater Treatment Plant and as a result it will and possibly already is having a negative impact on the Lower River Suir Special Area of Conservation. On this basis Michael O'Connell's land should be excluded from the Residential Zoned Land Tax as it has no prospect of being developed as there is no and will be even less capacity in Clonmel Wastewater Treatment Plant for further housing. Any proposed housing development will certainly have an extremely negative Environmental Impact Assessment Report.

For lands to be considered for Residential Zoned Land Tax, there should be an ease of connection to an existing footpath network to facilitate active travel modes from the outset. Provision of significant sections of new footpath across other landholdings, where the land is not in the control of the landowner or local authority should be discounted when considering lands to be in-scope.

Michael O'Connell's property is on the Glenconnor Road, which connects to the L3207 local road to the north and the R707 road to the south. There is insufficient capacity on the Glenconnor Road for any further development. The Glenconnor Road is serviced by a mini roundabout and T-junction, both of which are completely inappropriate for the existing level of commuter and commercial traffic on the road. There will be further increases in traffic on this road from the housing projects that are in construction on the road meaning that traffic congestion and pedestrian safety will be further compromised on the road. There are no cycle lanes and pedestrian footpaths are substandard with no facilities for Vulnerable Road Users. Proposing to develop Michael O'Connell's land will further exacerbate this problem.

There is insufficient capacity to connect Michael O'Connell's land to services as defined by the Residential Zoned Land Tax and therefore it should be excluded.

Furthermore, this is Michael O'Connell's home and livelihood which has been farmed by his family since before 1860, developing this land will make his farming enterprise unviable and effectively force him out of his business and home to create further congestion and safety issues on the Glenconnor and R707 roads and to pollute the Lower River Suir Special Area of Conservation.

Supporting documentation
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