

**Clifton Scannell Emerson** Associates

# **Addendum to EIAR Chapter 2 Project Description and Planning Policy Context Suir Island Infrastructure Links**





Environmental Project Engineering

Health Management and Safety



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# **Document Control Sheet**

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# **Table of Revised Contents**

Document Control Sheet			
Tab	le of Re	vised Contents	. 3
2	Addend	dum to EIAR Chapter 2 Project Description and Planning Policy Context	. 4
	2.1	Introduction	. 4
	Revise	d Section(s)	. 4
	2.5	Planning Policy Context	. 4
	2.5.1	Introduction	. 4
	2.5.4	Local Policy Context	. 4

Associates

Project: Suir Island Infrastructure Links



Title: Addendum to EIAR Chapter 2 Project Description and Planning Policy Context

# 2 Addendum to EIAR Chapter 2 Project Description and Planning Policy Context

# 2.1 Introduction

Tipperary Council submitted the Planning Application for the proposed Suir Island Infrastructure Links development on 25<sup>th</sup> September 2023. An Bord Pleanála issued a Request for Further Information (RFI) on 9<sup>th</sup> July 2024 in accordance with Section 51(4) of the Roads Act 1993, as amended.

RFI No. 5 stipulates that the response documentation should be in addendum format. Thus, this document sets out to address the necessary changes which pertains to EIAR Chapter 2 Project Description and Planning Policy Context. This addendum includes the following revisions or additions as shown in red text:

 Addition of the Clonmel and Environs Local Area Plan to Section 2.5.4 Local Policy Context which came into effect on 25<sup>th</sup> March 2024.

The additional information request Item No. 2 reads:

"a) An addendum report should be submitted to address the provisions of The Clonmel and Environs Local Area plan 2024-2030 which came into effect on 25th March 2024. This should address policy requirements in the LAP including Policy 6.2 and key planning criteria for the two regeneration sites (Site 3 - Quay Street, Sarsfield Street, and Site 11 - Suir Island Gardens, Suir Island) applicable to the Proposed Development site."

## Revised Section(s)

# 2.5 Planning Policy Context

## 2.5.1 Introduction

The following planning policy and design guidance documents were reviewed and described in the sections below as well as how the proposed development aligns with current objectives and standards:

#### **Local Policy Context**

• Addition of the Clonmel and Environs Local Area Plan 2024-2030;

## 2.5.4 Local Policy Context

#### Clonmel and Environs Local Area Plan 2024-20230

As noted above, the Local Area Plan (LAP) came into effect in March 2024. The purpose of the plan is to act as a framework for sustainable investment, to enable employment and homes, to protect the environment and heritage and to help deliver a good quality of life for everyone. The LAP replaces the Clonmel and Environs Development Plan 2013 (as extended).

The LAP is supported and underpinned by a detailed assessment of infrastructure and services available in the town, referred to as a Serviced Land Assessment (Appendix 1), a Local Transport Plan (Appendix 2), and a schedule of underused and vacant sites suitable for regeneration (Appendix 3). Appendices 4, 5 and 6 set out the detailed environmental, ecological and flood risk assessments carried out.

The LAP is focused on a renewed and targeted approach to compact growth and regeneration, with the town centre as the heart and focal point of Clonmel, and with clear consideration of climate change mitigation and adaptation measures and modal shift change in terms of how we get around. At the centre

Project: Suir Island Infrastructure Links



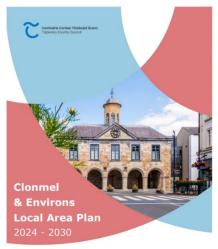
Title: Addendum to EIAR Chapter 2 Project Description and Planning Policy Context

of this LAP is consideration of quality of life for the community in the form of housing, jobs, education and amenities.

The LAP Policy and Objects which are considered to be relevant to the proposed development are summarised below:

**Policy 2.2** - Support new development that will enable sustainable housing growth, employment, community development and prosperity for Clonmel as a Key Town in line with the Strategic Objectives of the Town Centre Development Plan (TCDP).

**Policy 2.4** - Support and permit compact residential growth in Clonmel through the sustainable intensification and consolidation of the town centre and established residential areas to meet identified housing targets and requirements in line with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (DHLGH, 2024) and any review thereof.



March 2024

**Policy 3.1 -** Support compact growth through: (a) the collaborative redevelopment and reuse of vacant and underused sites and

areas in the 'Urban Core' and 'Compact Growth Area', (b) the development of sites identified through the Urban Regeneration and Development Fund (URDF); and (c) the redevelopment of Town Centre 'Regeneration Sites' and areas zoned 'Regeneration'.

**Policy 3.2** - Support new development proposals for regeneration sites which accord with the Key Planning Criteria for these sites set out in Appendix 3.

**Policy 3.7** - Support new development which delivers high quality urban design, compact growth, and facilitates connectivity and permeability as opportunities arise.

Policy 3.8 - Support the regeneration and development of Suir Island for town centre and amenity uses.

**Policy 6.1** - Support new development that will improve accessibility and movement within Clonmel, reduce dependency on private car transport, increase permeability in the town, and encourage the use of energy efficient forms of transport through the promotion of walking, cycling and public transport.

**Policy 6.2** - Support the implementation of the active travel measures identified in Figure 5 and the Local Transport Plan (Appendix 2) and require proposals for new development to compliment and demonstrate how they will integrate with the provisions of the Local Transport Plan.

**Policy 6.3** - Require that new developments are designed to comply with Design Manual for Urban Roads and Streets (DoT, 2019) and supplementary Advice Notes including making provision for pedestrian and cycle infrastructure, enhancing connectivity and accessibility to the town and providing universal access (in particular for persons with disabilities, reduced mobility and older people) where a whole journey approach is considered.

**Policy 6.8** - Support the implementation of the public transport measures identified in Table 14 and the Local Transport Plan (Appendix 2 of LAP).

The Clonmel Local Transport Plan (LTP) notes that "transport plays a crucial role in the vitality and growth of a town. It serves as the lifeline that connects the town's residents, businesses, and resources to the outside world, opening up opportunities and facilitating economic development. Reliable and

Project: Suir Island Infrastructure Links



Title: Addendum to EIAR Chapter 2 Project Description and Planning Policy Context

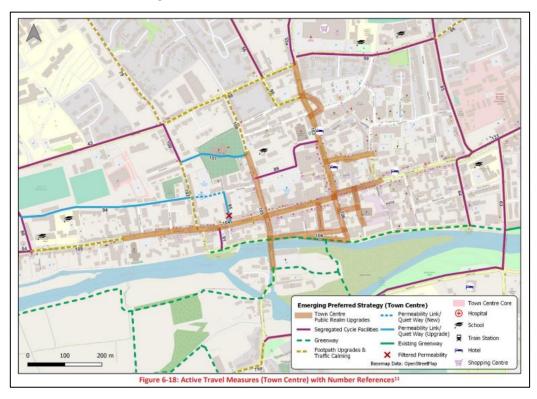
efficient transport infrastructure enables people to commute to work, access essential services, and engage in recreational activities beyond the town's borders."

The Suir Island Pedestrian & Cycling Bridge (i.e. the proposed development) will benefit these policies by enhancing connectivity and accessibility, support sustainable housing growth by improving access to housing and commercial areas located in the town centre and promote the quality of life of residents, and boost employment and local economy. Improved accessibility has proven to attract businesses and investors to the area and the construction and maintenance of the proposed development will create employment opportunities.

The proposed development will benefit policies by encouraging higher density developments by improving access and connectivity in the town centre and surrounding areas. The enhanced pedestrian and cycling linkages reduce the need for car ownership, making high-density living more practical and appealing. This carries over into the Local Transport Plan for Clonmel which is included in Appendix 2 of the LAP.

The LTP states that from a transport perspective, the ethos and actions within the plan are routed within the '10-minute' town concept and the shifting of transport trips to active travel. The plan aims to reduce the dominance of cars in the town centre and develop a number of key projects such as the Suir Island Pedestrian & Cycling Bridge (i.e. the proposed development) and a much higher level of service along the Waterford to Limerick Rail Line to increase the accessibility of the town. Successful implementation of these measures will promote active travel, enhance biodiversity, strengthen community cohesion, address vacancy and dereliction, stimulate the local economy, and contribute to a more sustainable future for Clonmel Town Centre.

The proposed bridge will also provide direct connectivity between the Suir Island Car Park and the town centre, making the Park & Stride option very attractive for commuters and visitors to the town, where people can park their car and walk directly into the town centre. This can help reduce the volume of traffic driving through, and parking in, Clonmel town centre particularly along O'Connell Street and Gladstone Street as shown in Figure 6-18 below.



Project: Suir Island Infrastructure Links

Title: Addendum to EIAR Chapter 2 Project Description and Planning Policy Context

The proposed development interfaces with the following Regeneration Sites identified in the LAP Appendix 3, namely; Site 3 - Quay Street, Sarsfield Street, and Site 11 - Suir Island Gardens, Suir Island.

The following planning criteria are summarised for the Quay Street and Sarsfield Street brownfield site which comprises of the former Clonmel Arms Hotel, a former bakery premises on the west side of Blue Anchor Lane, and the existing Quay Street carpark to the south interfacing with the River Suir:

- The site shall be redeveloped as a mixed-use town centre scheme, with a high-quality retail anchor unit with office and/or residential uses over.
- High standard of urban design for this prominent site on the junction of Sarsfield Street and The Quay, and interfacing with the River Suir.
- An Architectural Impact Statement should be prepared and should inform development proposals, having regard to the built heritage sensitivities associated with the ACA and Protected Structures both on and adjacent to the site.
- Any development proposal should have due regard to the planned pedestrian and cycle bridge connecting Quay Street across to Raheen Road via Suir Island.

The proposed development benefits this Regeneration Site and complies with the planning criteria by providing a high-quality, safe, sustainable urban design environment which interfaces with the Clonmel Arms Hotel, The Quays, Sarsfield Street and the Suir River. The pedestrian and cycle linkages will provide amenity benefits to the town centre and improve accessibility to commercial and retail units.

The Suir Island Gardens is located on the east side of Old Bridge Street, south of the town centre, the site has an area of approx. 2.9 hectares which interfaces with the proposed development. As highlighted in EIAR Chapter 1 Introduction, Table 6-1, The gardens development obtained Part VIII approval in October 2022. Detailed design and procurement process have been completed and the development is expected to be completed in 2025.

The following planning criteria are summarised for the Suir Island Gardens:

- The part of the site known as 'Suir Island Gardens' located towards the centre of the site, in addition to the eastern half of the site, is suitable for the development of a public garden and public landscaped areas for public amenity use.
- The north-western part of the site would be suitable for a mixed-use development, with a focus on residential use.
- Any development should preserve and enhance views towards the Comeragh Mountains.
- Any development should provide an active interface with Old Bridge Road to the west and public amenity land to the south and east.
- A Site-Specific Flood Risk Assessment will be required for any development proposal.
- The provision of a connection to sewerage mains is a prerequisite for development of this site.
- Applications for developments in flood vulnerable zones shall provide details on Emergency Response Planning in accordance with Section 2.2.5 'Emergency Response Planning' in Volume 3 (Development Management Standards) of the Tipperary County Development Plan 2022-2028.

The proposed development benefits the objectives and planning criteria summarised for the Suir Island Gardens site above, by providing a high-quality, safe and attractive route for pedestrians and cyclists to use the Gardens/Amenity area. Residents will benefit from a safety perspective from the additional access routes to the town centre and Raheen Road which negates the use of the constrained Old Bridge crossings consisting of narrow footpaths. The proposed development will create viewpoints to the Comeragh Mountains and provides linkages between residential and amenity facilities located on the Island. The proposed development was subject to a Site-Specific Flood Risk Assessment and OPW Application for Consent under Section 50 of the Arterial Drainage Act, 1945 & EU Regulations SI 122 of

Project: Suir Island Infrastructure Links



Title: Addendum to EIAR Chapter 2 Project Description and Planning Policy Context

2010 which demonstrates that the introduction of the pedestrian bridges will not adversely impact on the current Flood Risk Assessment prepared for the water-compatible Gardens development.

The provision of a foul-sewer connection forms part of the proposed development, which will cater for the residential and other properties located on Suir Island. The sewer connection will be pumped to the North Plaza via a pipeline installed inside the bridge deck. A Pre-Connection Application was submitted to Uisce Eireann, and confirmation of feasibility was received in January 2022.

The provision of new access/egress routes to Suir Island will benefit the emergency response plans for residential and amenity facilities located on the island by providing additional routes to the Town Centre or Raheen Road. The Suir island Gardens development is located within a flood vulnerable zone and early flood warning systems are available for Clonmel to warn residents or amenity users timeously of potential dangers.

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