



Comhairle Contae Thiobraid Árann
Tipperary County Council

Report on Submissions

Pre-Draft Consultation Stage

Clonmel Local Area Plan 2024 - 2030

Tipperary County Council Planning Policy and Projects Unit

February 2023

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1.0 Introduction

1.1 Context

Tipperary County Council has commenced the process of preparing a new Local Area Plan (LAP) for Clonmel. The LAP will replace the existing Clonmel & Environs Development Plan and will be prepared in accordance with Section 20 of the Planning and Development Act 2000 (as amended) and will set out the land use and development strategy for the town to ensure the town can support sustainable development and quality of life, in accordance with the provisions of the Tipperary County Development Plan 2022 - 2028. As part of a pre-draft consultation process, interested parties were invited to collaborate with Tipperary County Council in shaping the preparation of a Draft Clonmel LAP.

An issues booklet setting out the key trends and issues in Clonmel, explaining the LAP process and how to get involved, was published at the beginning of the pre-draft consultation on 4th November 2022. This was published on the County Council website and used to help promote and inform public participation in the LAP process.

1.2 Public Consultation

There were two components to the pre-draft consultation phase:

1. An invitation to make submissions - 4th November 2022 and 5th December 2022; and
2. A public consultation workshop on 23rd November 2022, Clonmel Public Library

A number of mechanisms were used to promote the public consultation process

1. A notice was published in local Newspapers;
2. Issues booklets and posters were circulated to the library;
3. The Public Participation Network circulated details of the process to their networks;
4. A dedicated webpage was setup on the Tipperary County Council website;
5. Further details were posted to the @PlanningTipp Twitter.

1.3 Submissions to pre-draft LAP consultation process

The public consultation workshop was attended by approximately 22 persons, who made input in suggestions and recommendations. In addition, 26 submissions (4 duplicates) were received within the consultation period. All submissions received are listed in Section 2.0 of this report, and each one is then summarised in Section 3.0.

1.4 Environmental Assessment

The Draft LAP will be subject to Appropriate Assessment Screening, pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC)) and Strategic Environmental Assessment (with Scoping in advance of publication of the Draft LAP), in compliance with the Strategic Environmental Assessment Directive (2001/42/EC).

In addition, in accordance with Article 14A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004) and 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009), the Draft LAP will be subject to Strategic Flood Risk Assessment to assess the risk of flooding to the development of the town as set out by the Draft LAP.

As a result of these processes the supporting reports will be published to inform of the publication of the Draft LAP:

- Strategic Environmental Assessment Environmental Report,
- Natura Impact Assessment Screening Determination and Natura Impact Assessment Report (as the case may be),
- Strategic Flood Risk Assessment.

1.5 Next Steps

This Report is now submitted to the Elected Members of the Council for their consideration. Thereafter, the Planning Authority will prepare a Draft LAP for the consideration of the Elected Members. The Draft LAP will be informed by submissions received within the consultation period, direct stakeholder engagement, and the Elected Members considerations. Workshops will be held to facilitate this process. The Draft LAP will be placed on public consultation at the end of summer 2023, after which a Chief Executive's report on submissions received to the Draft LAP will be prepared, and Elected Members will then consider whether to adopt the LAP or amend it.

2.0 List of Submissions to pre-draft LAP process

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

Submission Type	No.	Name
Statutory Consultees (including submissions received in response to SEA Scoping Report), State Bodies and other Government Departments	18.	Office of the Planning Regulator (OPR)
	4.	Office of Public Works (OPW)
	12.	Transport Infrastructure Ireland (TII)
	13.	Transport Infrastructure Ireland (TII) – Duplicate of No. 12
	26.	National Transport Authority (NTA)
	28.	Irish Water (IW)
	8.	Department of Education (DoE)
	9.	Department of Education (DoE) – Duplicate of No. 8
Local Bodies	20.	Marlfield Village Association
Zoning Related Submissions	10.	Chris & Breda Lee
	10.	John Stokes
	16.	Bekan Property Ltd. c/o Tony Bamford Planning
	21.	Powerstown Park Ltd. c/o Armstrong Planning Ltd
	22.	Sadie Tobin
	23.	Sadie Tobin (map associated with No. 22)
	30.	Donal McGrath
Individual Submissions	1.	John Kiely
	2.	Joseph O'Dwyer
	3.	Cllr. Michael Murphy
	5.	Michael Fitzgibbon
	7.	Robert & Ciara Hannon
	11.	Niall J. Dennehy
	14.	Michael Fitzgibbon
	15.	Ruairi O'Caisleain
	17.	Brian & Joan McCarthy
	19.	Alan Moore
	24.	Alan Moore (duplicate of No. 19)
	25.	Lucy Moore
	27.	Myriam Madigan
	29.	Breda Parle

3.0 Summary and consideration of pre-draft LAP Submissions

3.1 Statutory Consultees

Submission Number: 18	Submission Name: Office of the Planning Regulator
	Submission Type: Statutory Consultee
<p>Submission Summary:</p> <p>The OPR thanks and commends the Planning Authority for preparing the Issues Paper and welcomes the commencement of the Plan-making process.</p> <p>OPR sets out its statutory role in the plan-making process and underlines 10 themes that should be addressed in the Draft Plan making process.</p> <p>1. Strategic Policy Framework</p> <p>Notes that the planning authority will be required to ensure the LAP is consistent with national and regional policy and references RPO17 of the Southern Regional Spatial and Economic Strategy (RSES). The OPR encourages the planning authority to liaise with the Southern Regional Assembly to ensure consistency with the RSES.</p> <p>In aligning with the RSES, the LAP should consider the strategic vision, goals and guiding principles of the RSES, in addition to consistency with the relevant regional policy objectives (RPOs).</p> <p>The LAP should also consider practical implementation issues and measures that can best be promoted via the policies and objectives of the LAP.</p> <p>2. Development Plan and Core Strategy</p> <p>In its submission, the OPR notes that pursuant to Section 19(2Xb) of the Planning and Development Act 2000 (as amended), the Local Area Plan is required to be consistent with the objectives of the County Development Plan (CDP) and its Core Strategy. The OPR further notes that a key message of the Section 28 Local Area Plan Guidelines for Planning Authorities (2013) (LAP Guidelines) is that consistency between local area plans and the core strategy of development plans is an essential requirement, particularly in relation to the quantum and location of lands identified for development. As such, the OPR would</p>	

caution against the introduction of any objectives that would conflict with the detailed provisions of the core strategy for the settlement and the housing supply target for the settlement.

In referring to the Core Strategy contained in Chapter 2 of the Tipperary County Development Plan 2022-2028, the OPR notes that there is currently 136ha of available land zoned for residential development in Clonmel and the Core Strategy sets out an estimated requirement of between 51.8 and 63.5ha of residential zoned land.

As with its submissions on the CDP, the OPR raises concern about the extent of residential zoning relative to that required to deliver the housing supply targets for the Key Towns and District Towns. The OPR notes that the planning authority is committed, through the preparation of the LAPs, to implementing methodologies set out in the NPF and Development Plan Guidelines to address excess residential land use zoning.

3. Zoning, Compact Growth and Infrastructural Services

Land use zoning objectives must be consistent with policy objectives of the NPF and RSES, particularly, in the context of climate change, objectives for compact growth under the NPF (NPO 3c) and the RSES (RPO 35) and the efficient use of land (NPO 35).

Any provision or standards for residential density or building height in the LAP should have regard to relevant Section 28 guidelines. Land use zoning should also follow the policy and objective for a sequential approach to zoning for residential development set out under section 6.2.3 of the Development Plans Guidelines.

Settlement Capacity Audits should be carried out in accordance with section 4.5.2 of the Development Plan Guidelines. All lands zoned for development must be serviced or serviceable within the lifetimes of the Plan, enabling the planning authority to meet the growth targets for the plan period, including through the delivery of strategic employment land at Ballingarrane as identified in the RSES.

The OPR therefore advises the planning authority to utilise the available resources and liaise closely and collaborate with the relevant prescribed authorities concerning the delivery of essential services and infrastructure.

4. Regeneration

Regeneration and revitalisation of settlements through reuse of brownfield sites and vacant/underutilised buildings will play a crucial role in mitigating climate change. An evidence-based approach should be taken to the identification of regeneration sites or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration, where applicable. Specific to Clonmel, the OPR refers to RPO 17, which identifies lands at Kickham Barracks and Clonmel Flights of Discovery for planned place-making initiatives.

The OPR notes that for larger settlements (>10,000 population), the Development Plan Guidelines advise that the identification of 'regeneration areas' should be coordinated with the identification of 'Settlement Consolidation Sites' determined by the planning authority. The LAP should align with the objectives of the regeneration strategy of the development plan and focus development on the key regeneration sites identified.

The LAP should identify intended sources of funding to facilitate, support or complement key regeneration projects, such as the recently announced Urban Regeneration and Development Fund and Croí Cónaithe (Towns) Fund Scheme.

5. Education, Social and Community Facilities

The LAP should be consistent with the NPF and RSES with regard to education, social and community facilities, including catering for the needs of an ageing population and the Traveller community. In this regard, the local authority's *Local Economic and Community Plan 2015-2020* (LECP) and *Traveller Accommodation Programme 2019-2024* should also inform the LAP.

It is important that the LAP takes an integrated approach to the planning of education, social and community facilities and amenities, and ensure that facilities can be easily accessed by walking or cycling from existing and proposed new residential areas. In doing so, the LAP should consider the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents.

6. Economic Development and Employment

The NPF, RSES and the LAP Guidelines emphasise the need to take an evidence-based approach to the inclusion of objectives for employment and other commercial uses. The NPF expects that the local authority's LECP would inform the LAP to provide for the co-ordinated spatial planning for the area.

The Development Plan Guidelines recognise accessibility as a central consideration in selecting employment zonings and the transport provision of potential locations for development needs to be strategically considered, including through the application of the sequential approach.

The OPR notes that the RSES and the County Development Plan identify Ballingarrane Park as a strategic employment landbank for Clonmel and refer to Munster Vales and the Suir Blueway as significant tourist infrastructure, relevant to the settlement.

7. Transport and Mobility

An integrated approach to land use and transport planning will be central to achieving climate change targets. In addition to the above, the LAP should be informed by the guiding principles and be consistent with the RPOs of the RSES relating to integration of land use and transport planning. A Local Transport Plan (LPT) is required for Clonmel as a key town under the RSES.

The transport strategy of the LAP should also demonstrate consistency with the Avoid-Shift-Improve principle, the implementation of the Decide Provide approach and the 10-minute town concept.

The proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019), including in particular ‘filtered permeability’, will ensure that over time the area will better accommodate pedestrians and cyclists, in addition to public transport where available. Similarly, the implementation of the NTA’s *Permeability Best Practice Guide* will also ensure enhanced pedestrian and cycle routes within the area of the LAP.

8. Environment and Natural and Built Heritage

The OPR notes that the planning authority will be aware of its obligations with regard to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA), and relevant guidelines should be followed.

To ensure that the planning system responds to national environmental challenges the Office highlights, in particular, the importance of integrating green and blue infrastructure into the LAP, in accordance with NPO 58 and the objectives and guiding principles of the RSES.

NPO 17, the RSES and several section 28 guidelines (LAP Guidelines and the Development Plans Guidelines, among others) recognise that protecting, conserving and managing sites and features of special interest, in addition to public realm improvements,

can instigate a heritage-led regeneration of settlements to generate economic benefits in terms of tourist footfall, improved retail environment and improved quality of life. The re-use of built heritage will contribute to compact growth and regeneration and to climate change mitigation having regard to embodied carbon.

The planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP, have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

9. Climate Change Mitigation and Adaptation

Flood risk management is the most critical climate change adaptation measure to be addressed in the LAP and the planning authority should have regard to Section 28 guidelines. The planning authority should overlay the flood risk zones on any proposed land use zoning maps, to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied.

Digital copies of the mapping data available to the Office and to the OPW to facilitate assessment. The planning authority should also liaise with the OPW in developing the draft Plan. Nature based sustainable urban drainage systems should be integrated in development of policies.

10. Implementation and Monitoring

The planning authority is encouraged to provide for monitoring of implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines.

Summary

The OPR commends the local planning authority for its work in producing the pre-draft Issues Paper:

- The draft LAP should ensure that residential land use zoning is consistent with the Core Strategy and objective 4-A of the Development Plan;
- The draft LAP should make efficient use of land through appropriate densities;
- The draft LAP should identify 'Settlement Consolidation Sites' for the purpose of encouraging compact growth and town centre revitalisation;
- The draft LAP should ensure that the provision of social and community infrastructure is delivered in tandem with new residential zoned lands;
- In terms of Economic Development, the draft LAP should ensure alignment with the RSES;

- In relation to Accessibility and Transport, the draft LAP should be informed by the preparation of a Local Transport Plan;
- The planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP
- With regard to climate change mitigation and adaptation, the draft LAP should seek to include policies and objectives in relation to the implementation of SuDS and nature-based solutions as a means for managing surface water run-off at key development sites. Irish Water has indicated that there is sufficient water supply and wastewater capacity in the town to cater for the projected growth as set out in the core strategy;
- In relation to flooding, an SFRA should be carried out as part of the LAP in accordance with the staged approach to flood risk assessment under the Flood Guidelines, including the carrying out of Justification Tests where required;
- The planning authority is encouraged to provide for monitoring of implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines.

Consideration:

The OPR submission is welcomed, and the office's stated willingness to engage in direct conversations on the development of the LAP is also welcome. The comments principally relate to the requirement to ensure consistency with the NPF, RSES, Section 28 guidance and other relevant policy documents. These comments are fair and will be addressed in the Draft LAP. Officers of Tipperary County Council planning department have held initial discussions with officers of the OPR and intend to meet with officers of the OPR to discuss the development of the LAP in more detail.

1. Strategic Policy Framework:

The Draft LAP will be consistent with the national and regional level objectives and guiding principles set out in the NPF and RSES.

2. Development Plan and Core Strategy:

The provisions of the Tipperary County Development Plan 2022 - 2028 will inform the Draft LAP, and the Draft LAP for the 'Key Town (Self-Sustaining Regional Driver)' of Clonmel will be written with cognisance to its Core Strategy in order to inform new local development in association with the strategic objectives of the County Development Plan.

3. Zoning, Compact Growth and Infrastructural Services:

A detailed assessment of lands that are currently zoned (residential uses and employment uses) will be carried out in terms of their services, and also their location having consideration to matters such as proximity to the central area, active travel and compact growth principles. This serviced land assessment (SLA) will be set out as an appendix to the Draft LAP.

4. Regeneration:

The Draft LAP will provide for urban regeneration. The Draft LAP will apply the principles of Town Centre First and will identify regeneration sites as a priority for collaborative development in the town centre. The Draft LAP will set out a framework for future investment through national funding streams including the Urban Regeneration and Development Fund, Active Travel Programmes etc, and other community funding streams and supports as administered by sources including the Housing Section of the Council, the Local Enterprise Office, Leader etc.

5. Education, Social and Community Amenities:

The Draft LAP will ensure that its policies allow for Clonmel to continue as an important educational, social and community hub for the communities in the town and its hinterlands. Ensuring social and community infrastructure is available to serve the projected population of Clonmel through the plan period will be a key consideration of the Draft LAP, and the plan will seek to ensure that adequate land is available to meet projected need and the policies of the Plan support new educational, social and community development.

6. Economic Development and Employment:

The SLA will provide for a sequential approach to economic development. This, along with the work being carried out in the preparation of Local Transport Plan (LTP) for Clonmel, will allow for an integrated approach to land use and transport planning for enterprise, employment and enterprise development. The Draft LAP will include policies and objectives to support the growth of the strategic employment location at Ballingarrane.

7. Transport and Mobility:

The NTA and the Council are working with transport consultants, SYSTRA and JB Barry, in the preparation of an LTP for Clonmel with modal shift targets. The purpose of the LTP is to provide a transport strategy for the town and its projected growth with an emphasis on promoting active and sustainable transport. The emerging LTP will inform the transport policies and objectives of the Draft LAP and will be incorporated into final LAP when adopted.

8. Environment and Natural Built Heritage:

The Council have appointed environmental consultants, CAAS, to prepare a SEA and AA for the plan area to assess the plan for potential environmental risks. The Council are in continuous engagement with Irish Water in the SLA process to ensure that lands identified for development are appropriately serviced for water and wastewater. The Draft LAP will include objectives for green and blue infrastructure and for the protection, revitalisation and regeneration of Clonmel's rich built heritage.

9. Climate Change Mitigation and Adaptation:

The Draft LAP will be guided by the TCDP's strong climate action ethos in line with the Climate Action and Low Carbon Development (Amendment) Act 2021 and will include locally specific climate mitigation objectives. An SFRA will be prepared for the plan area to ensure that flood risk is mitigated against. The SFRA will be a key consideration in the SLA. The Draft LAP will align with the TCDPs objectives for the implementation of SuDS as a drainage solution.

10. Implementation and Monitoring:

The LAP objectives will be monitored for implementation as per the provisions of the Development Plan Guidelines.

Submission Number: 4

Submission Name:

Office of Public Works

Submission Type:

State Body

Submission Summary:

The planning authority should refer to the Section 28 Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009), to ensure that the key principles of flood risk management and sustainable planning are adopted.

The OPW and TCC undertook the National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme, through which Flood Risk Management plans (FRMPs) and flood maps were prepared. The CFRAM Programme included analysis of flood risk in Clonmel, the LAP shall be guided by such maps. The submission provides further guidance on the flood risk management within the Plan area which is summarised within.

Consideration:

This submission is noted and, in particular, the avoidance of flood risk in Clonmel through appropriate land zoning and in the setting out of flood risk policy will be considered in the preparation of the Draft Clonmel Local Area Plan as part of a detailed Strategic Flood Risk Assessment currently under preparation.

Submission Number: 12

Submission Name:

Transport Infrastructure Ireland (Tii)

Submission Type:

State Body

Submission Summary:

TII recommends that the development objectives included in the Draft LAP reflect the provisions of the NPF, DoECLG's Spatial and National Roads Guidelines and RSES, for the ongoing safe and efficient operation of national roads.

TII would welcome the inclusion of strategic policy requirements to reflect the following:

- Reduce reliance on private cars and achieve a modal shift to sustainable transport;
- Promote integrated land use and transport planning;
- Maintain the strategic function, capacity and safety of the national road network, including planning for future capacity enhancements;
- Ensure existing transport networks are maintained to a high level;
- Prepare a Local Transport Plan for Clonmel to inform the land use zoning strategy for the town and its environs.

TII refers to Objective RPO 167 of the RSES, which outlines that it is an objective for National Road Projects to be delivered during the period up to 2027, under which the 'N24 Waterford to Cahir /Cahir to Limerick Junction' national road scheme is a listed project. The TII notes that lands within the Clonmel and Environs are situated within the Constraints Study Area for the N24 Waterford to Cahir national road scheme. This scheme should be protected in future local area plans in accordance with requirements of Section 29 of the Spatial Planning and National Road Guidelines for Planning Authorities (2012).

The Council may wish to identify local improvements to national roads within the LAP. The LAP shall include a policy to avoid the creation of additional accesses onto national roads over 50kph. The Council is requested to reference the Road Safety Impact Assessment (RSIA) and Road Safety Audit (RSA) in the LAP for new development proposals. The Council is requested to include the requirement for Traffic and Transport Assessments (TTA) in the LAP citing the TII Traffic and

Transport Assessment Guidelines (2014). A forward planning approach to roadside service facilities is encouraged in accordance with TII Policy on Service Areas (August 2014). Further guidance is provided on signage, noise, safeguarding national road drainage regimes and renewable energy and grid connections which is summarised in the submission.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan. The guidance referenced is noted and will be adhered to in the preparation of the Draft LAP.

The NTA and the Council are working with transport consultants, SYSTRA and JB Barry, in the preparation of an LTP for Clonmel with modal shift targets. The purpose of the LTP is to provide a transport strategy for the town and its projected growth with an emphasis on promoting active and sustainable transport. The emerging LTP will inform the transport policies and objectives of the Draft LAP and will be incorporated into final LAP when adopted. The Local Transport Plan for Clonmel will have a focus on delivery of a number of the strategic policy requirements outlined in the TII submission.

The route and link corridors options for the N24 upgrade will be protected where necessary within the draft LAP. Planning officers are engaging with the TII and Road Design Office in this respect.

Submission Number: 26

Submission Name:

National Transport Authority

Submission Type:

State Body

Submission Summary:

The NTA provided feedback to the pre-draft issues paper as set out under the following **12 themes**:

- 1. Guiding Principles:** A summary of the guiding principles to support the consolidation of urban-generated development in complement with the integration of land use and transport planning is provided.
- 2. Road User Hierarchy:** The LAP should align with The National Sustainable Mobility Policy and The National Investment Framework for Transport in Ireland (NIFTI) and should seek the reallocation of road space to sustainable transport in appropriate locations. NIFTI sets the road user hierarchy as 1. Active Travel, 2. Public Transport, 3. Private Vehicles and sets the intervention hierarchy as 1. Maintain, 2. Optimise, 3. Improve, 4. New.

- 3. Climate Action Plan:** As per the Climate Action Plan the LAP should seek to; reduce demand for travel; increase public transport and active travel; convert to a zero-emissions transport fleet.
- 4. Movement at Settlement Level – Local Transport Plan (LTP):** The NTA notes that the preparation of a Local Transport Plan (LTP) for Clonmel has already commenced and that this is being progressed based on the NTA/Tii document Area Based Transport Assessment and Pilot Methodology. The purpose of the LTP is to ensure that the assessment of transport demand and its associated impact plays a central role in informing future development proposals, to support a shift to sustainable modes based on the road user hierarchy and to set a framework for investment in transport infrastructure within the town to support this. The NTA supports that intention that the LTP will be taken forward as part of the Local Area plan (LAP) that is being prepared for Clonmel and will continue to work with the Council in its preparation of the LTP.
- 5. Movement at Inter-Settlement Level:** There is an opportunity to explore commuting patterns and identify the transport infrastructure and services required to serve the town. This should be used to inform the land use policies to provide more sustainable travel pattern outcomes and meet future need.
- 6. Walking and Cycling:** The LAP should identify walking and cycling deficiencies in the town and propose measures to enhance routes from origin to destination.
- 7. Provision of Public Transport Services in Rural Areas:** The NTA will continue to provide rural transport services through Local Link and their Connecting Ireland plan seeks to further improve mobility in rural areas. The LAP should acknowledge the role rural transport services perform in providing for social and economic connectivity.
- 8. Accessibility:** Enabling universal access and facilitating and promoting universal design should be a key consideration in the LAP, as it relates to transport policies and objectives. Objectives which promote universal design in the external built environment such as providing separate pedestrian entrances, the provision of dropped curbs and tactile paving will provide a safer and more attractive environment for all.
- 9. Strategic Road Investment:** In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that development objectives should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines (2012), and that this should be referenced in the LAP.
- 10. Traffic management:** The LAP should consider traffic management within Clonmel with the objective of ensuring that the movement of people by public transport, walking and cycling, and the movement of goods, is not adversely affected by private car traffic, and that the impacts of traffic congestion can be managed. In particular this should include an analysis of car parking provision within the town and the inclusion of objectives and measures to manage car parking which is a key determinant of the likelihood of someone

using a car. This should include reviewing and reallocating on-street parking; using parking charges to ensure a short stay parking over commuter use; reviewing access arrangements into car-parks to improve road use efficiency.

11. NTA Guidance Documents: A suite of guidance documents are listed to be inform the Draft LAP.

12. Indicators – Mode Share: It is recommended that consideration is given at the LAP level to include sustainable transport indicators, including mode share, to monitor the effectiveness of policies and development objectives. The NTA would be happy to work with Tipperary County Council on the development and analysis of sustainable transport indicators, in conjunction with the OPR.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.

It should be noted that with respect to land zoning, a detailed assessment of lands that are currently zoned will be carried out to include consideration of the integration of land use and transport planning, services and also location having consideration to matters such as proximity to the central area, the nature and capacity of roads infrastructure, active travel and compact growth principles. This Serviced Land Assessment will be set out as an appendix to the Draft Plan. In addition, the Draft Plan will be accompanied by a Local Transport Plan with objectives for active travel and public transport investment, and targets for modal shift. Responses under each of the submission themes are provided below:

1. Guiding Principles:

The Draft LAP will have an emphasis on compact growth, sequential development and integrated land use and transport planning and will consider the guiding principles set out in the NPF, the RSES and the NTA's submission.

2. Road User Hierarchy:

The road user hierarchy and the objectives of the National Sustainable Mobility Policy (DoT, 2022) and NIFTI (DoT, 2021) will be considered in the Draft LAP and the associated LTP.

3. Climate Action Plan:

The Climate Action Plan (DECC, 2019) greatly informed the TCDP and the current iteration will be a similar guide for the objectives of the Draft LAP.

4. Movement at Settlement Level – Local Transport Plans (LTP):

As noted in the submission the Council is working with the NTA and transport consultants, SYSTRA and JB Barry, in the preparation of an LTP for Clonmel. The emerging LTP will guide the transport objectives of the LAP and will form part of the LAP once adopted.

5. Movement at Inter-Settlement Level:

Both the LTP and the 'Commuting and Jobs Profile for Tipperary' (TCC, 2018) provide analysis of movement at an inter-settlement level which provides important data in the preparation of sustainable transport solutions to and within the settlement.

6. Walking and Cycling:

The LTP is conducting a comprehensive analysis of the existing walking and cycling network in Clonmel and identifying how these can be enhanced in order to achieve a modal shift away from cars. The Council's dedicated Active Travel Team are actively engaging with the NTA in the identification of potential walking and cycling infrastructure projects to be put forward for internal and external funding.

7. Provision of Public Transport Services in Rural Areas:

The LTP has considered that NTA's draft plans for enhanced public transport services and the LTP team is and will continue to engage with Tipperary 'Local Link' throughout the LTP process.

8. Accessibility:

The LAP will align with the TCDP in promoting disability awareness and improved equal access for all through 'Universal Design' for public transport access, housing, social, cultural and recreational facilities and the public realm, to improve quality of life equally for abled and disabled citizens.

9. Strategic Road Investment:

The key transport corridors traversing the Plan area will be considered for their strategic function within the Draft LAP.

10. Traffic management:

Traffic management and car-parking will be key considerations in the LTP process.

11. NTA Guidance Documents:

The guidance documents have formed part of the baseline assessment for both the LAP and LTP.

12. Indicators – Mode Share:

The Council will continue to work with the NTA and the appointed transport consultants to prepare appropriate indicators for mode share so that the plans can be effectively monitored and assessed.

Submission Number: 28

Submission Name:

Irish Water

Submission Type:

State Body

Submission Summary:

Irish Water (IW) provide a summary of their key guiding policies and plans. IW has also provided a summary of the water and wastewater infrastructure and constraints for Clonmel, shown below:

Water Supply Capacity

Settlement:	Existing population (CSO 2016):	CDP 2022-2028 Population target to 2028:	CDP 2022-2028 population increase:	Water Supply Capacity:
Clonmel	17,140	20,568	3,428	There is limited water supply capacity in Clonmel. Upgrades are required to cater for the projected growth within the lifetime of the plan. Irish Water's Infrastructure Delivery Directorate is progressing a project to expand Monroe well-field, which will provide additional capacity – current programmed Completion Date is Q4, 2026.

Water Network Known Constraints

Settlement:	General Network Infrastructure
Clonmel	<p>Irish Water's Infrastructure Delivery Directorate is progressing a project to expand Monroe well-field (referenced above), which includes the required network upgrades to deliver water into Clonmel once made available - current programmed Completion Date is Q4, 2026.</p> <p>It is envisaged that existing capacity is available in some sections of the distribution network to cater for growth in the settlement, provided it is well balanced across the life of the plan. Local network upgrades would need to be delivered to provide capacity to individual sites, these can be customer driven/funded in accordance with our Connections Charging Policy.</p>

Wastewater Treatment Capacity

Settlement:	Existing population (CSO 2016):	CDP 2022-2028 Population target to 2028:	CDP 2022-2028 population increase:	Wastewater Treatment Capacity:
Clonmel	17,140	20,568	3,428	The latest wastewater treatment capacity register, issued in 2022, indicates there is sufficient capacity to cater for the projected growth within the lifetime of the plan.

Wastewater Network Known Constraints

Settlement:	General Network Infrastructure
Clonmel	A Drainage area plan is planned for Clonmel and will determine the capital upgrades required to cater for growth. Currently it is envisaged that capacity is available to cater for the population targets identified to 2028. Local network upgrades would need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded in accordance with the requirements of the Connections Charging Policy.

IW has also provided feedback under a number of subheadings to Land Development Issues:

Land Use Zoning: Sequential development in areas with existing water services infrastructure and spare capacity is encouraged. Available network information indicates that network extensions may be required to service some zones sites, localised network upgrades may also be required. Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works.

In settlements where the Wastewater Treatment Plant (WWTP) is close to lands with potential for the development of sensitive receptors e.g. residential dwellings, any future development of these lands should take account of the established use of the existing WWTP and the potential for extensions / intensification of use of the WWTP in the future.

There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or WWTPs should not generally be considered by planning authorities.

Serviceability of Settlements: Irish Water would urge the Planning Authority to refer to mapping undertaken as part of the Residential Zoned Land Tax (RZLT) process, to assist in identifying suitable lands for zoning.

All new residential and commercial/industrial developments wishing to connect to an Irish Water network are to be assessed through Irish Water's Connections and Developer Service.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan. The Council has already begun engagement with IW and continue to will work with IW in the further assessment of this submission and in the preparation of the draft LAP with particular reference to Serviced Land Assessment and assessment of lands to be zoned.

Submission Number: 8

Submission Name:

Department of Education

Submission Type:

Government Department

Submission Summary:

The Department notes the CDP population growth targets for Clonmel to 2031 and deduces that should the projections materialise, a requirement for additional education provision may emerge over the lifetime of the LAP and beyond. The Department notes the issues paper's emphasis on town centre regeneration and compact growth and highlights the associated need for the provision of schools in town centre sites to accommodate such growth. The LAP should be explicit in its support for adequate school accommodation, including new schools and the expansion of existing schools. The Department highlights the requirement for future unseen capacity, giving the Ukrainian crisis as an example, and cites the pressures this places on existing schools. It also anticipates the future requirement for Special Education Needs at primary and secondary level and the associated additional requirement for accommodation to facilitate such.

Consideration:

This submission is noted and the proposed population increase and unforeseen events such as the Ukraine crisis are noted in terms of their potential to increase demand for school places and subsequent need for expansion of existing facilities and the construction of new facilities, will be considered in the preparation of the Draft Clonmel Local Area Plan.

3.2 Local Bodies

Submission Number: 2	Submission Name: Marlfield Village Association c/o Bernard Lennon
	Submission Type: Local Bodies
Submission Summary: <p>To make provision for the following improvements and facilities in Marlfield Village:</p> <ul style="list-style-type: none"> • Traffic calming measures / speed ramps at various locations; • Improved facilities at new bottle bank; • Improvements to green area at Sandybanks; • New street signage for the village, reverting to the old style of signage and old street names; • New streetlighting to reflect heritage status of the village; • Reduction in speed limit for the village; • Improvements to the roundabout west of the village; • Provision of new footpaths to connect the village to St. Patrick's Cross; • Surface improvement at St. Patrick's Chapel; • Provision of linear flower/shrub beds on the road from Village Cross towards Sandybanks. 	
Consideration: <p>The submission relates to Marlfield, a village located approximately 3km west of Clonmel town centre. The village is not within the development boundary of the Clonmel Town and Environs Local Area Plan, rather is covered under the Tipperary County Development Plan (CDP) 2022-2028. Volume 2 of the CDP 2022-2028 includes a 'Settlement Plan' for Marlfield, providing a guide, including objectives, for the development of the village during the CDP period.</p>	

3.3 Zoning Related Submissions

Submission Number: 6	Submission Name: Chris & Breda Lee Submission Type: Zoning Related Submission
<p>Submission Summary:</p> <p>The submission relates to lands of approximately 9.5 hectares / 23.4 acres at Ard Gaoithe in the townland of Ardgeeha Lower, located on the eastern side of the R688 Cashel Road, north of the town. The lands are identified in the map below, outlined in black.</p> <div data-bbox="459 694 1117 1400" data-label="Image"> </div> <p>In highlighting that the land is zoned 'New Residential' in the Clonmel & Environs Development Plan 2013, the submission notes the following:</p> <ul style="list-style-type: none"> • The land forms part of a strategic landbank identified for new residential development which is both serviceable and readily accessible. • The lands themselves afford the opportunity for the logical northward expansion of Clonmel town and occupy a highly sought-after location proximate to a wide variety of services & amenities as well as several major employers, including the pharmaceutical manufacturing facilities of Abbott (Vascular) and Boston Scientific in addition to the Ard Gaoithe Business Park. 	

In addition, the submission requests the following in respect of road and transport objectives in the new LAP:

- Omission of any link road corridor objective from their lands, specifically referring to an objective in the Clonmel & Environs Development Plan, 2013 for an 'indicative route' / road corridor through the submission land (shown in map below, which is an extract from the 'Map 2: Transportation Map' contained in the Clonmel & Environs Development Plan, 2013; and, by association,
- Inclusion of an objective to facilitate direct access to the submission land from the R688 Cashel Road.



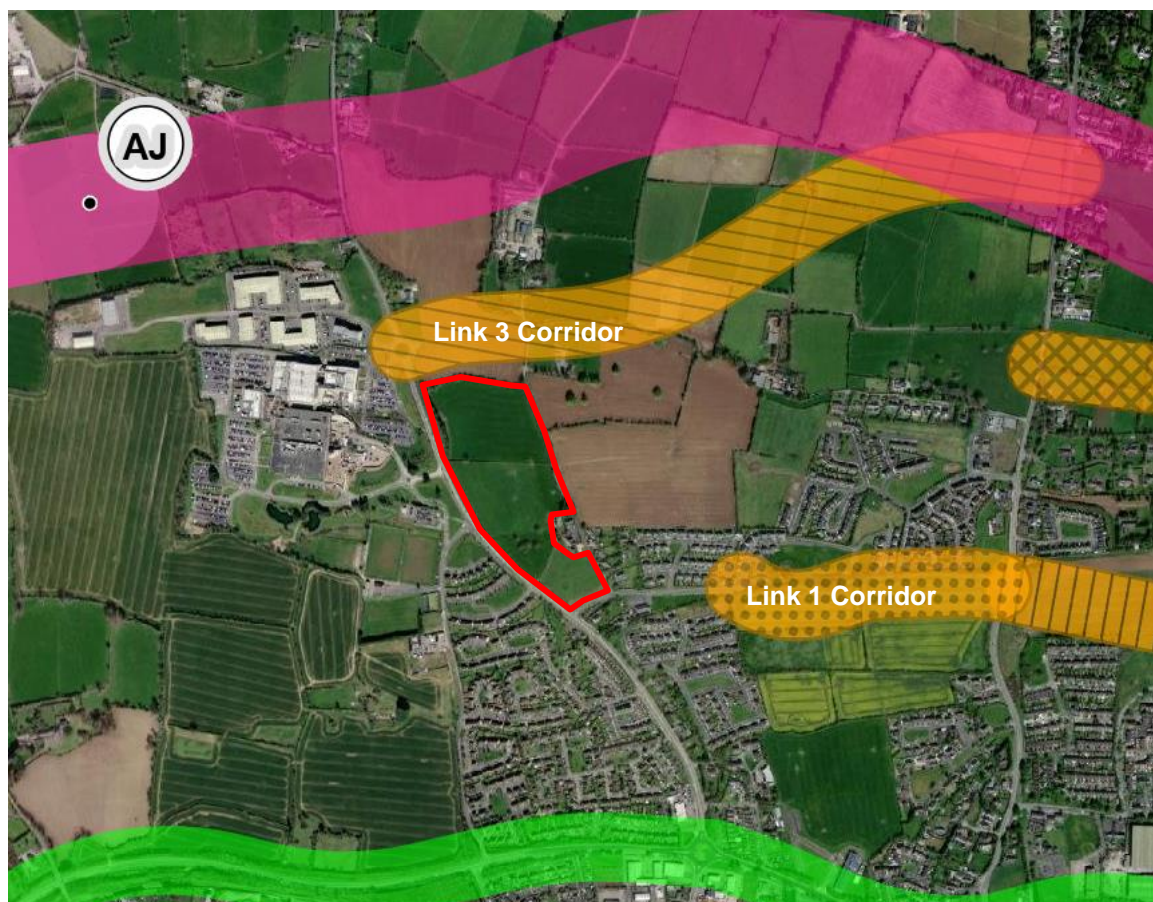
In support of the above request, the submission makes the following points:

- Referring to the above 'indicative route' / road corridor objective, the likelihood of any such road coming to fruition by means of the private sector is virtually nil given that the vast majority of the route in question traverses the rural environs of Clonmel and lands which are unlikely to be used for any purposes other than agriculture for the foreseeable future. In all probability, any such distributor road would not be completed over the lifetime of multiple development plans.
- The N24 Waterford to Cahir Road Scheme Project, provided for under the National Development Plan 2018-2027, provides for a series of options that involve the re-routing of the N24 thereby bypassing Clonmel town. Phase 2: 'Options Selection' is ongoing with

the second non-statutory public consultation on 'Alternatives and Options' having taken place between 3rd May and 20th May, 2022.

- In addition to a series of options that involve the re-routing of the national road, the scheme identifies four road links as part of a traffic management plan for the Clonmel Urban Area. These new road links are 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.
- It is submitted that the development of Road Links 1 & 3 (as shown to be part of the N24 Waterford to Cahir Project) represents the most up-to-date policy position in terms of addressing traffic congestion along the N24 National Route within the Clonmel Urban Area. Accordingly, it is submitted that the provision of a further 'indicative route' / road corridor through the submission lands at Ard Gaoithe (as shown on Map 2 'Transportation' of the Clonmel & Environs Development Plan, 2013) is wholly unnecessary and completely at odds with the current policy position of Transportation Infrastructure Ireland.

The map below shows the submission land (outlined in red) in the context of Link Corridors 1 and 3 as per the N24 Waterford to Cahir Road Scheme Project.



- In respect of future development of the submission land, specifically access, it is accepted that there will be a need for a road designed in line with the Design Manual for Urban

Roads and Streets in order to service the submission land and that this could potentially afford access to other development lands, subject to agreement between the parties concerned.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan (LAP).

The zoning of residential land will be considered in line with the Core Strategy requirements set out in the County Development Plan and principles of compact growth and will have regard to a serviced land assessment which will take place with respect to all lands zoned within the Clonmel Town and Environs Development Plan boundary and will form an appendix to the Draft Clonmel LAP.

The N24 Waterford to Cahir Road Scheme Project is being developed by Kilkenny County Council in partnership with Tipperary County Council, Transport Infrastructure Ireland (TII) and the Department of Transport (DoT). As noted in the submission, the second non-statutory public consultation on ‘Alternatives and Options’ 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 by the abovementioned project team 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 Q2 2023.

The preferred solution along with stakeholder consultation with the TII, will further inform decisions around roads objectives in the new Clonmel LAP.

Submission Number: 10

Submission Name:

John Stokes

Submission Type:

Zoning Related Submission

Submission Summary:

The submission relates to the former mart site (outlined in red below - stated area of approximately 0.687 hectares / 1.7 acres) in the townland of Burgagery-Land East on the southern side of Davis Road, immediately west of Dunnes Stores.

The submission, which refers to a previous refusal on the site (discount foodstore Ref. 1155002), including matters relating to retail use and flood risk, requests that the site be zoned to allow for residential or retail uses, noting the potential for social housing or housing for the elderly.



Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan (LAP).

In the Clonmel & Environs Development Plan 2013, the site is zoned 'Commercial', the objective of which is 'To provide for mixed commercial facilities that do not compete with the Town Centre function'. Under the matrix for the land use zoning, 'Residential' and 'Retail Warehousing' are both 'Open for Consideration' while 'Supermarket' is 'Not Permitted'. The site is also identified within Appendix 1 of the 2013 Plan as being part of a larger development opportunity site, 'Opportunity Site No. 3'.

The zoning of land in the new LAP will be informed by an evidenced based approach. It should be noted that in terms of residential zoned land, this will be considered in line with the Core Strategy requirements set out in the County Development Plan and principles of compact growth and will have regard to a serviced land assessment which will take place with respect to all lands zoned within the Clonmel Town and Environs Development Plan boundary and will form an appendix to the Draft Clonmel LAP. In addition, the quantum of land zoned for residential development includes consideration of the capacity of mixed-use zoning which include residential, as such, decisions around the location of mixed-use zonings and matrix of uses which apply to those zonings will require careful consideration during the preparation of the draft LAP.

The draft LAP will also be subject to Strategic Environmental Assessment, including flood risk assessment.

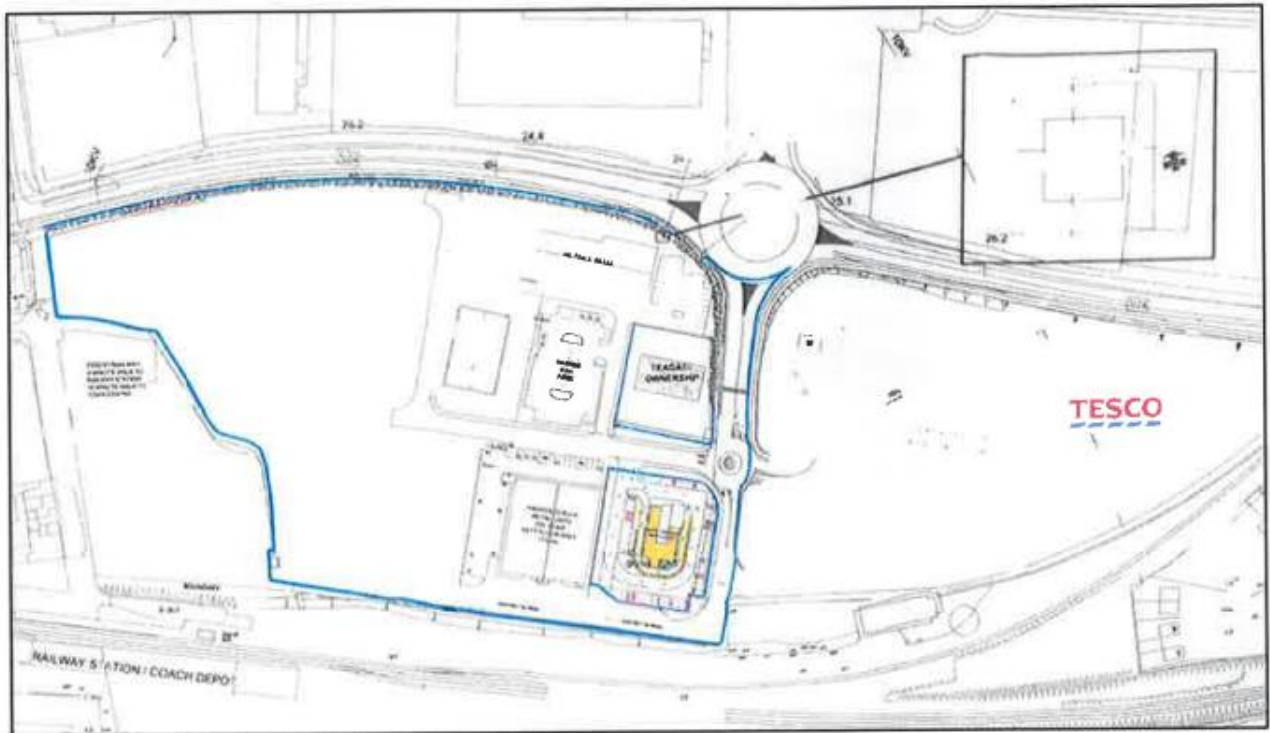
Submission Number: 16	Submission Name: Bekan Property Ltd. c/o Tony Bamford Planning
	Submission Type: Zoning Related Submission

Submission Summary:

This submission relates to approximately 8 hectares or 20 acres of land located south east of the N24 Fethard Road Roundabout, in the townland of Burgagery-Land West. The map included with the submission, shown below, provides an overview of the submission site, which includes the land outlined in blue and also the land to the east (on which Tesco and Certa service station are located).

Much of the site is already developed, comprising Tesco, Certa service station to the east, and Mr. Price, Supermacs, JYSK furniture store and a Teagasc local advisory office to the west, along with approximately 2.2 hectares (5.5 acres) of undeveloped land on the western side.

The submission notes that the land is zoned 'Light Industry and Employment in the Clonmel & Environs Development Plan 2013 and requests that mixed use zoning be applied in the new Local Area Plan to allow uses including residential, offices, leisure and suitable retail development.



The submission makes the following points:

- The land's accessibility to the Clonmel Railway Station significantly raises the profile of the site as a suitable location for more intensive commercial development ranging from residential through offices, leisure and suitable retail development.
- The subject lands have immense potential to contribute to compact growth, play a key role in the 10-minute town concept given:
 - Their proximity and ease of access to the town centre to the south;
 - Ease of access and immediate proximity to the railway station;
 - Ease of access to major radial and arterial roads (allowing the introduction of better bus and cycling services;
 - Proximity to the extensive, established employment lands
- There has been little substantial comparison retail development in the town since 2016.
- Part of the ambition for the site is to see a further expansion of the bulky goods retail to cater for two additional retail operators who have been searching for space in the town for some years.

- The town centre has limited opportunities for new retail development witnessed by the recent permission for LIDL in the northern fringe of the central area. There will be potential for smaller infill development but retailers with larger footprints will need more space.
- The Planning Authority needs to reconsider its position on retail, especially in locations such as Burgagery which has the potential to enhance the town's retail offer, create new jobs whilst also linking with the town centre and being of benefit to it, rather than being a source of competition.
- The submission is not seeking a blanket Retail Warehousing zoning for the lands, but also mindful that any planning application for retail warehousing would be subject to both retail impact and sequential assessment.
- Assessment of the very general information available is that there is more than sufficient Employment zoned lands in the town - without the subject site. This is supported by the Background Paper prepared for the County Development Plan which (Economy and Employment) which identifies the undeveloped, 300 acre, publicly owned site at Ballingarrane, Clonmel which will be used for targeting pharma/medical devices and food processing clusters.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan (LAP).

In the Clonmel & Environs Development Plan 2013, the site is zoned 'Light Industry and Employment', the objective of which is '*To provide for light industry and technology, incubation units, general employment and related uses*'. Under the matrix for the land use zoning, 'Residential' and 'Retail Warehousing' are both 'Not Permitted'.

The provision of retail warehousing in the town will be examined as part of the preparation of the draft LAP, having due regard to the Regional Spatial and Economic Strategy, County Development Plan and Retail Planning Guidelines for Planning Authorities, (DECLG 2012).

The zoning of land in the new LAP will be informed by an evidenced based approach. It should be noted that in terms of residential zoned land, this will be considered in line with the Core Strategy requirements set out in the County Development Plan and principles of compact growth and will have regard to a serviced land assessment which will take place with respect to all lands zoned within the Clonmel Town and Environs Development Plan boundary and will form an appendix to the Draft Clonmel LAP.

In addition, the quantum of land zoned for residential development includes consideration of the capacity of mixed-use zoning which include residential, as such, decisions around the location of mixed-use zonings and matrix of uses which apply to those zonings will require careful consideration during the preparation of the draft LAP.

The draft LAP will also be subject to Strategic Environmental Assessment, including flood risk assessment.

Submission Number: 21

Submission Name:

Powerstown Park Ltd. c/o Armstrong Planning Ltd.

Submission Type:

Zoning Related Submission

Submission Summary:

This submission is made by the owners and operators of the Clonmel Racecourse at Powerstown Park, which extends to some 63 hectares on the north-eastern fringe of the town.



The submission notes that the racecourse is an important employer and local economic generator, as well as being a key attraction and driver of footfall and activity in Clonmel town centre. As such, Powerstown Park Ltd is a significant community stakeholder.

The submission requests the following:

- it would be appropriate for the forthcoming LAP to include the racecourse in the LAP boundary, and to acknowledge the important role that Powerstown Park plays in promoting tourism, generating employment, stimulating the economy, and providing recreation and amenity facilities.
- it would be prudent for the 'Transport and Movement' policies of the LAP to seek to preserve and improve sustainable linkages between the racecourse and the town centre.
- that approximately 17 hectares (shaded yellow on the map above) be zoned to allow for residential apartments, light industry and commercial uses, as well as potentially tall buildings and medium to high density development, which could be appropriate at this location.
- That a small area on the southern edge of the land, (shaded blue on the map above) be zoned for light industrial. This land can be easily accessed from the N24 via Knockaun Court and falls directly opposite land that is already zoned Light Industry & Employment, and would therefore seem suitable for light industrial uses given the site context and nature of surrounding land uses.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan (LAP).

In the Clonmel & Environs Development Plan 2013, the site is zoned 'Amenity', the objective of which is '*To preserve and enhance recreation and amenity areas*'. Under the matrix for the land use zoning, most uses including 'Residential', 'Light Industry and Employment', and 'Retail Warehousing' are 'Not Permitted'. The only uses which can be considered are 'Agricultural Buildings', Caravan Park/Camping', and 'Community Facility'.

The zoning of land in the new LAP will be informed by an evidenced based approach. It should be noted that in terms of residential zoned land, this will be considered in line with the Core Strategy requirements set out in the County Development Plan and principles of compact growth and will have regard to a serviced land assessment which will take place with respect to all lands zoned within the Clonmel Town and Environs Development Plan boundary and will form an appendix to the Draft Clonmel LAP.

In addition, the quantum of land zoned for residential development includes consideration of the capacity of mixed-use zoning which include residential, as such, decisions around the location of mixed-use zonings and matrix of uses which apply to those zonings will require careful consideration during the preparation of the draft LAP.

Submission Number: 22 & 23

Submission Name:

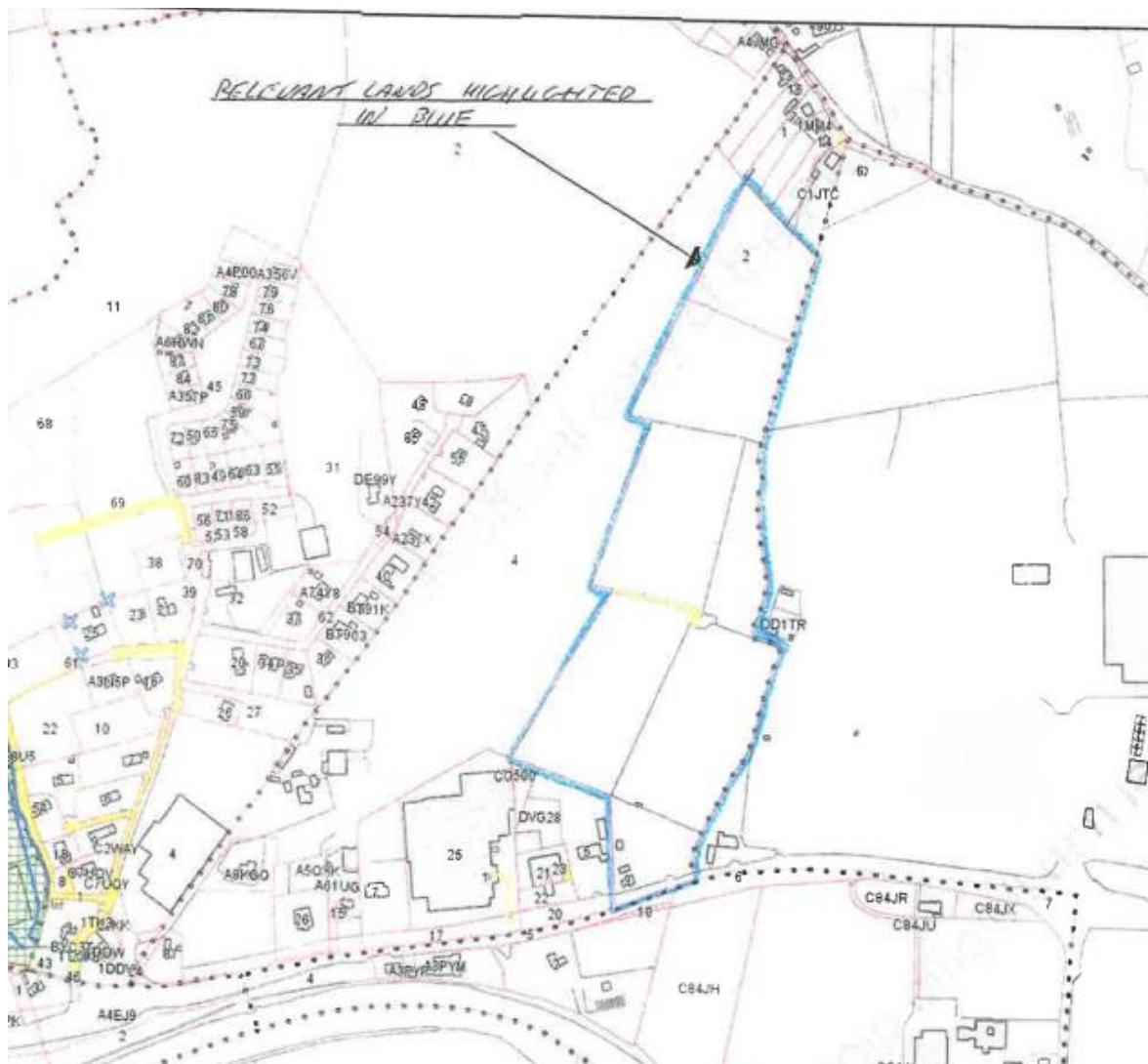
Sadie Tobin

Submission Type:

Zoning Related Submission

Submission Summary

Submission relates folio TY22009, comprising 9.93 hectares / 24.5 acres of land (outlined in blue in the map below) in the townland of Laganore to the east of the town, located on the north side of the N24 and immediately west of the Bulmers brewery land. The submission requests that the zoning of the lands be changed from 'General Industrial' to 'Residential'.



The submission makes the following points:

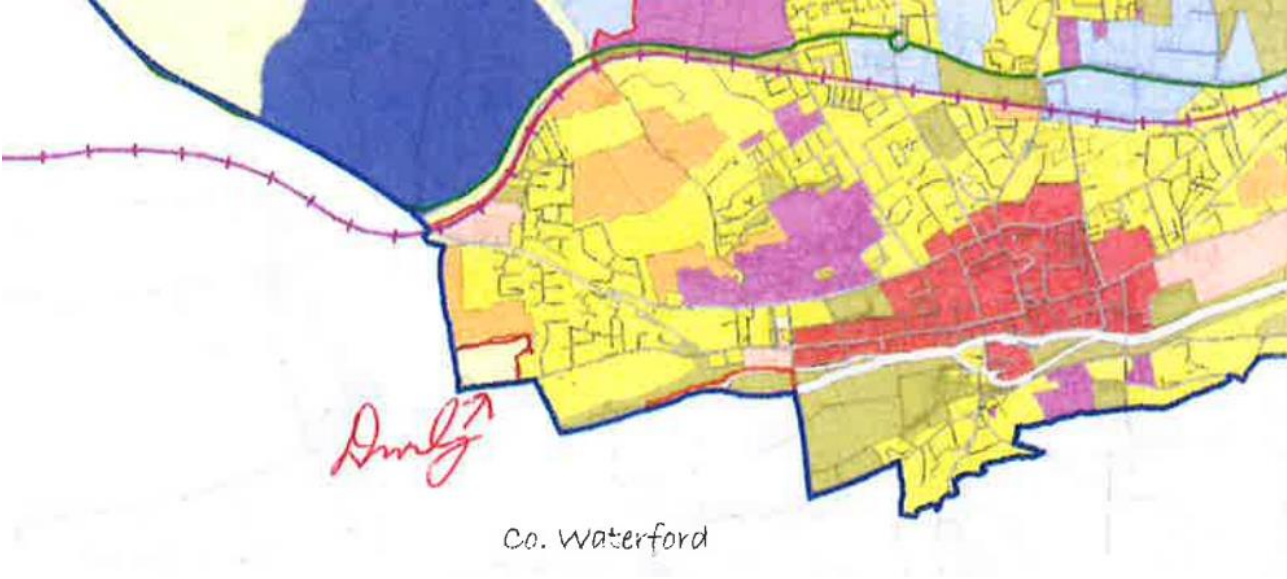
- The land is currently being used for agriculture. The total area land is 9.933 hectares which lends to a high volume of housing.
- Considering that homes and community is one of the key issues which must be addressed under the Plan and that currently there is a high demand for residential site and housing in Clonmel and the surrounding areas
- Access to this land is off N24 which lends to a direct commute to Cahir, Cork, Limerick, Waterford, Kilkenny and Dublin.
- Public foul sewer available.
- Public watermain available
- There is no history of flooding
- There are no Archaeological or Heritage restraints.
- There is a ring fort in the adjacent lands to the west of these lands, but the zone of Archaeological potential does not extend into these lands.
- No previous Planning applications on file for this land.
- No enforcement notices on file for these lands.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan (LAP).

In the Clonmel & Environs Development Plan 2013, the site is zoned 'General Industrial', the objective of which is '*To provide for heavy industry and related uses*'. Under the matrix for the land use zoning, 'Residential' is 'Not Permitted'.

The zoning of land in the new LAP will be informed by an evidenced based approach. It should be noted that in terms of residential zoned land, this will be considered in line with the Core Strategy requirements set out in the County Development Plan and principles of compact growth and will have regard to a serviced land assessment which will take place with respect to all lands zoned within the Clonmel Town and Environs Development Plan boundary and will form an appendix to the Draft Clonmel LAP.

Submission Number: 30	Submission Name: Donal McGrath
	Submission Type: Zoning Related Submission
<p>Submission Summary:</p> <p>This submission relates to agricultural land located in the southwest corner of the current development plan boundary, identified by the landowner in the map extract below.</p> <p>The submission requests that the zoning of the land remain as such to reflect the agricultural use.</p> 	
<p>Consideration:</p> <p>This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.</p>	

3.4 Individual Submissions

Submission Number: 1	Submission Name: John Kiely
	Submission Type: Individual Submission
<p>Submission Summary</p> <p>This submission makes the following points:</p> <ul style="list-style-type: none"> • More empty premises compared to 2016 • Plan to tackle vacancy at Market Place • Possibility of reducing rates in certain parts of the town to address vacant and derelict buildings • Clonmel is a very prosperous town with high employment compared to other towns of a similar size • Plan to open Bulmers Museum by 2023? • Solutions needed for Clonmel Arms • Need to promote Clonmel as a place to live, work, do business and visit • Improvements needed to train links • Commends blueway and plans for Kickham Barracks • Will new Garda Station open before 2030? 	
<p>Consideration:</p> <p>This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.</p> <p>In particular, the LAP will include objectives that seek to address vacant and derelict buildings and sites. An evidence-based approach will be used to identify regeneration sites / consolidation sites or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration. The LAP will also seek to complement the County Development Plan with more town specific policies and objectives for active land management which will in turn support and underpin available funding streams, such as the Urban Regeneration and Development Fund.</p>	

Submission Number: 2	Submission Name: Joseph O'Dwyer
	Submission Type: Individual Submission
Submission Summary: <p>Considers that drawing comparisons between 2016 and 2011 Census of Population for Clonmel town is imperfect for the reason that the CSO boundary changed in 2016.</p>	
Consideration: <p>This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.</p> <p>Note that the target population increase from 17,140 in 2016 to 22,282 by 2031 represents a 30% population increase as provided for under the Core Strategy in Tipperary County Development Plan 2022-2028, a target which is supported for Key Towns under the Regional Spatial and Economic Strategy for the Southern Region.</p>	

Submission Number: 3	Submission Name: Cllr. Michael Murphy
	Submission Type: Individual Submission
Submission Summary <p>The submission acknowledges the Key Issues and Questions set out in the pre-draft Issues Paper, but also makes the following comments:</p> <p><u>Water services infrastructure</u></p> <ul style="list-style-type: none"> • The wastewater infrastructure in Clonmel, in terms of the spare capacity of the town's wastewater treatment plant and the extent of the sewerage network, seems to be adequate for future development during the lifetime of the LAP. • Tipperary County Council is acutely aware of the challenges presented to the security of the existing water supply services by the constant interruptions to supply caused by operational issues at the water treatment plants located at Poulavanogue and Glenary (and, to a lesser extent, at Monroe) and by the water outages due to bursts in an ageing watermain network. 	

- The case for urgent and significant investment in the town's water supply infrastructure has been well made to Irish Water, as the water services authority, by both the executive and the elected members of Tipperary County Council.
- It is difficult to reconcile future development proposals (whether residential, industrial or commercial), including for the development of the Ballingarrane Science, Business and Technology Campus, which will require a secure and adequate water supply.

LAP boundary

- The submission queries if the LAP boundary is smaller than that of the Clonmel & Environs Development Plan 2013.
- The submission queries if the Marlfield area will be included in the new LAP

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.

In response to the Issues Paper, Irish Water has provided a summary of the water infrastructure and constraints for Clonmel, shown below.

Water Supply Capacity

Settlement:	Existing population (CSO 2016):	CDP 2022-2028 Population target to 2028:	CDP 2022-2028 population increase:	Water Supply Capacity:
Clonmel	17,140	20,568	3,428	There is limited water supply capacity in Clonmel. Upgrades are required to cater for the projected growth within the lifetime of the plan. Irish Water's Infrastructure Delivery Directorate is progressing a project to expand Monroe well-field, which will provide additional capacity – current programmed Completion Date is Q4, 2026.

Water Network Known Constraints

Settlement:	General Network Infrastructure
Clonmel	<p>Irish Water's Infrastructure Delivery Directorate is progressing a project to expand Monroe well-field (referenced above), which includes the required network upgrades to deliver water into Clonmel once made available - current programmed Completion Date is Q4, 2026.</p> <p>It is envisaged that existing capacity is available in some sections of the distribution network to cater for growth in the settlement, provided it is well balanced across the life of the plan. Local network upgrades would need to be delivered to provide capacity to individual sites, these can be customer driven/funded in accordance with our Connections Charging Policy.</p>

The Council will continue to work with Irish Water in the preparation of the LAP with particular reference to Serviced Land Assessment and consideration of lands to be zoned.

The development boundary for the LAP will remain unchanged from that of the Clonmel & Environs Development Plan 2013. Page 3 of the Issues Paper illustrates shading, used to represent the extent of the town which is within 15-minute cycling distance of the town centre.

In respect of Marlfield, the village is not within the development boundary of the Clonmel Town and Environs Local Area Plan, rather is covered under the Tipperary County Development Plan (CDP) 2022-2028. Volume 2 of the CDP 2022-2028 includes a ‘Settlement Plan’ for Marlfield, providing a guide, including objectives, for the development of the village during the CDP period.

Submission Number: 5

Submission Name:

Michael Fitzgibbon

Submission Type:

Individual Submission

Submission Summary

The submission makes the following comments under the general heading of ‘Town Centre and Regeneration’:

- Town centre has little or no vibrancy in contrast to the town 15-20 years ago and in contrast to other towns of similar size
- Lack of vibrancy has led to inability for businesses to attract staff
- A key factor in the demise may have been caused by the transfer of major shops to the periphery of the town and their lack of replacements
- In respect of the above, the submission suggests the following:
 - Car parking charges in out-of-town shopping centre similar to Liffey Valley in Dublin
 - Flat rate parking charges on Town periphery car parks, i.e., what is currently being done in Suir Island to be rolled out to other car parks.
 - Semi pedestrianise town centre streets
 - Improved access for cyclists
 - Like any shopping centre the town centre needs an “anchor” tenant, currently there is no unique attraction in the town centre. Council should aggressively pursue anchor tenants, e.g.
 - Large retail (Lidl is a start but not quite town centre)
 - Indoor sports hall (bowling, rock climbing, Laser tag etc...)
 - Hotel
- Clonmel town centre has more than its fair share of derelict & vacant sites, none of which are on the derelict site or vacant site register

- Aggressively advertise and encourage options for “Over the shop” living
- Encourage large employers in the periphery of Clonmel (e.g. Abbott, Boston Scientific, Bulmer’s) to move some of their staff into offices in the town centre.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.

The LAP will seek to complement the County Development Plan with more town specific policies and objectives to promote the Town Centre First approach, addressing vacancy and dereliction within the towns centre, and thereby seeking to support the Government response such as through planned actions under the Vacant Homes Action Plan 2023-2026 and publications including ‘Bringing Back Homes - Manual for the reuse of existing buildings’.

Car parking charges is not a matter for the Local Area Plan

Improved pedestrian and cycling provisions through LTPs and Active Travel Plans to be incorporated into the plan – ‘A Local Transport Plan is currently being prepared in tandem with the LAP. In terms of cycle routes, the Local Transport Plan will be guided by NTA’s cycle connects programme.’

Submission Number: 7

Submission Name:

Robert & Ciara Hannon

Submission Type:

Individual Submission

Submission Summary

The submission relates to the rural housing policy within the environs of Clonmel, referring to Policy HSG10 in the Clonmel & Environs Development Plan 2013 and a decision to refuse permission in the townland of Rathronan. The submission refers to the NPF, RSES for the Southern Region and the Tipperary County Development Plan 2022-2028 in respect of the provisions relating to houses in the rural area.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.

Submission Number: 11	Submission Name: Niall J. Dennehy
	Submission Type: Individual Submission
Submission Summary <p>The submission makes the following comments in respect of roads and transport issues:</p> <ul style="list-style-type: none"> • That in light of the proposed new N24 road (Cahir to Waterford), consideration be given to upgrading the Fethard Road and Cashel Road roundabouts on the Frank Drohan inner relief road to "Cyclops" type roundabouts. • That the LAP contains an objective to implement dedicated cycle ways within the area indicated as "Cycling Proximity: 15 minutes to Centre" as shown in the Clonmel LAP Issues Paper. • That a pedestrian crossing across the N24 Frank Drohan inner relief road be incorporated to provide a safe pedestrian and cyclist crossing for Powerstown National School and Gurtnafleur Business Park. 	
Consideration: <p>This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.</p> <p>A Local Transport Plan is currently being prepared in tandem with the LAP. In terms of cycle routes, the Local Transport Plan will be guided by NTA's cycle connects programme.</p>	

Submission Number: 14	Submission Name: Michael Fitzgibbon
	Submission Type: Individual Submission
Submission Summary <p>The submission makes the following comments under the general heading of 'Transport and Movement':</p> <p><u>Cycling</u></p> <ul style="list-style-type: none"> • Implement cycle connects whenever it's ready • Cycle infrastructure on narrow street and junction, not wide straight roads • 'South Tipperary Active Travel Towns: Walking and Cycling Strategies' Final August 2013 did suggest a 30kph zone in the town centre 	

Pedestrians

- Currently in Clonmel town centre the car is king, as demonstrated by the removal of a pedestrian crossing from O'Connell Street to Mitchell Street a number of years ago to aid traffic flow. There are a number of pedestrian crossings in town but not enough.
- Encourage cars in town centre and prioritise pedestrians, cyclists and buses, and introduce 30 kph speed limit.
- Semi-pedestrianise town centre streets
- Flat rate parking charges on town periphery car parks
- Create a low car density space within the 10-minute town centre walking band as shown on the map contained in the LAP Issues Paper.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan. A Local Transport Plan is currently being prepared in tandem with the LAP. In terms of cycle routes, the Local Transport Plan will be guided by NTA's cycle connects programme.

Submission Number: 15

Submission Name:

Ruairi O'Caisleain

Submission Type:

Individual Submission

Submission Summary

The submission makes the following comments regarding youth friendly spaces:

- Provision for a specific youth-friendly outdoor public space in the town.
- Ideas for developing this space would emerge from a process of consultation with young people through the Comhairle na nÓg structure.
- The need for youth friendly spaces has been identified by the Tipperary Comhairle

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan. The Council will actively engage with youth organisations during the public consultation phase of the Draft Local Area Plan.

Submission Number: 17	Submission Name: Brian & Joan McCarthy
	Submission Type: Individual Submission
Submission Summary <p>The submission relates to the rural housing policy within the environs of Clonmel, referring to Policy HSG10 in the Clonmel & Environs Development Plan 2013. The submission refers to the NPF, RSES for the Southern Region and the Tipperary County Development Plan 2022-2028 in respect of the provisions relating to houses in the rural area. The submission also suggests policies that would facilitate elderly home-owners to downsize their homes by building a smaller property on their own land, and allowing a family to avail of the existing larger property.</p>	
Consideration: <p>This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.</p>	

Submission Number: 19	Submission Name: Alan Moore
	Submission Type: Individual Submission
Submission Summary <p>The submission makes the following comments:</p> <p><u>Overall Vision</u></p> <ul style="list-style-type: none"> • A thriving metropolis with inviting entry routes, well served by public transport including rail routes with services that allow commuting to other centres. • A town with a living centre where over the shop accommodation is in use. • A green centre. • A town which celebrates its key advantages which include the River Suir and very close proximity to uplands to the South. <p><u>Town Centre and Regeneration</u></p> <ul style="list-style-type: none"> • Issues with Public Realm Plan: <ul style="list-style-type: none"> - Unnecessary new lighting - Future pedestrianisation not incorporated into surfacing - No provision of rain gardens for SuDS drainage - Loss of existing street trees 	

Employment and Economy

- Strengths include a well-established pharma and med- tech industry with potential for further expansion.
- Lack of housing undermines this potential.
- Rates for businesses are a source of on-going concern

Transport and Movement

- Poor rail connection is a major drawback. Better public transport all round must be a priority over and above new road building.
- All new road building needs to reflect the requirements of cyclists and pedestrians with lessons to be learned from the continents such as in Amsterdam, Utrecht, Copenhagen etc.
- Primacy in this area should be directed to facilitating safe cycle routes to all schools from residential areas.

Climate Action and Biodiversity

- The urgent employment of a Biodiversity Officer to be pursued along with a new Tree strategy to be expedited, specifically:
 - Town allotments
 - Mini forests
 - More trees everywhere
 - No mow let it grow (National Biodiversity Plan).
 - Only native seeds to be used where planting verges etc.
 - Hire trained arborists to carry out all tree pruning.
 - Certified agents to be employed for hedge cutting

Homes and Community

- Critical sports facilities include skate parks (Sports Hub is a great development but Clonmel needs skate parks accessible to all and this includes town centre as a healthy development and a counter to antisocial behaviour by bored youths)

Tourism and Recreation

- Clonmel has a unique selling point: its proximity to river and mountain. This could be the source of future employment (river trips, mountain walking and mountain biking holidays, accommodation, cafes and food, equipment and service etc.)

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.

The Draft LAP will be guided by the TCDP's strong climate action ethos in line with the Climate Action and Low Carbon Development (Amendment) Act 2021 and will include locally specific climate mitigation objectives. An SFRA will be prepared for the plan area to ensure that flood risk is mitigated against. The SFRA will be a key consideration in the SLA. The Draft LAP will align with the TCDPs objectives for the implementation of SuDS as a drainage solution.

In particular, the LAP will include objectives that seek to address vacant and derelict buildings and sites. An evidence-based approach will be used to identify regeneration sites / consolidation sites or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration. The LAP will also seek to complement the County Development Plan with more town specific policies and objectives for active land management which will in turn support and underpin available funding streams, such as the Urban Regeneration and Development Fund.

It should be noted that with respect to land zoning, a detailed assessment of lands that are currently zoned will be carried out to include consideration of the integration of land use and transport planning, services and also location having consideration to matters such as proximity to the central area, the nature and capacity of roads infrastructure, active travel and compact growth principles. This Serviced Land Assessment will be set out as an appendix to the Draft Plan. In addition, the Draft Plan will be accompanied by a Local Transport Plan with objectives for active travel and public transport investment, and targets for modal shift.

Submission Number: 25

Submission Name:

Lucy Moore

Submission Type:

Individual Submission

Submission Summary

The submission makes the following comments:

- More green space and trees to balance hard landscaping in the town
- Improved cycle paths to reduce car dependency and reduce carbon emissions.
- Seeks to retain old street lamps on main streets
- Provision of allotments
- Assistance to people who wish to live above shops
- Encourage town centre shopping through varied parking charges

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.

The Draft LAP will be guided by the TCDP's strong climate action ethos in line with the Climate Action and Low Carbon Development (Amendment) Act 2021 and will include locally specific climate mitigation objectives. An SFRA will be prepared for the plan area to ensure that flood risk is mitigated against. The SFRA will be a key consideration in the SLA. The Draft LAP will align with the TCDPs objectives for the implementation of SuDS as a drainage solution.

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Submission Number: 27**Submission Name:**

Myriam Madigan

Submission Type:

Individual Submission

Submission Summary

The submission makes the following comments:

Overall Vision

- By making Clonmel an environmentally and visually appealing place to live and work, a higher standard of living can be achieved and a far happier society will thrive.

Town Centre and Regeneration

- Supports the 'Town Centre First' approach
- Issues to be addressed:
 - Begging on the street
 - Drug selling
 - Lack of safety, especially during evening hours
 - Problems with people of ethnic minority
 - Older people feeling left out
 - Littering

- Enforcement of speed limits

Climate Action and Biodiversity

- Strongly encourages the use of brown sites within towns for new housing
- Requests that no more shopping centres or supermarkets are built
- Encourages both external and internal insulation for as many private houses as possible
- Supports planting in public spaces and encourages local people to do similarly within their own gardens
- Seeks to drastically reduce dairy and beef farming and encourage and financially support local farmers to grow vegetables.

Homes and Community

- Need to address large number of derelict properties, above shops and large spaces such as the Clonmel Arms Hotel and the Market Square
- Inclusion of all in the provision of houses
- More imagination in house types and design
- Encourages opportunities for dancing

Employment and Economy

- By putting environment first in every instance, a huge amount of work and creative opportunities will emerge within the environmental process itself.

Transport and Movement

- Supports 15-minute town concept, people should be encouraged to walk and cycle
- Sustainable modes of travel such as local trains and buses must come electric
- Suggests the provision of a local bus service, possibly a loop service going from Clonmel to Fethard, Cashel and Cahir
- Speed limits need to be enforced to protect cyclists

Tourism and Recreation

- Providing recreation for local (and surrounding) people is vitally important
- Supporting the arts and music in the streets (buskers), concerts at some of the local hotels and bars, are great ways to enhance the local community and attract visitors

Built Heritage

- Revival of streets through refurbishment of buildings / houses, for example, Wolfe Tone Street and Anglesea Street

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.

The Draft LAP will be guided by the TCDP's strong climate action ethos in line with the Climate Action and Low Carbon Development (Amendment) Act 2021 and will include locally specific climate mitigation objectives. An SFRA will be prepared for the plan area to ensure that flood risk is mitigated against. The SFRA will be a key consideration in the SLA. The Draft LAP will align with the TCDPs objectives for the implementation of SuDS as a drainage solution.

In particular, the LAP will include objectives that seek to address vacant and derelict buildings and sites. An evidence-based approach will be used to identify regeneration sites / consolidation sites or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration. The LAP will also seek to complement the County Development Plan with more town specific policies and objectives for active land management which will in turn support and underpin available funding streams, such as the Urban Regeneration and Development Fund.

It should be noted that with respect to land zoning, a detailed assessment of lands that are currently zoned will be carried out to include consideration of the integration of land use and transport planning, services and also location having consideration to matters such as proximity to the central area, the nature and capacity of roads infrastructure, active travel and compact growth principles. This Serviced Land Assessment will be set out as an appendix to the Draft Plan. In addition, the Draft Plan will be accompanied by a Local Transport Plan with objectives for active travel and public transport investment, and targets for modal shift.

Submission Number: 29	Submission Name:
	Breda Parle
	Submission Type:
	Individual Submission

Submission Summary

The submission makes the following comments:

Marlfield

- Speed limits to be reduced
- Footpaths on Moore's Road
- Proper bus service for Marlfield to Clonmel
- Sweeping of roads

- Big belly bin at Sandybanks
- Large container for plastic bottles
- More green areas, less concrete

Clonmel

- Regular bus service for the town and surrounding areas
- Proper sorting of rubbish at Clonmel Recycling Centre (Carrigeen)
- Need to address vacant shops and houses
- Maintenance of Clonmel railway station and proper shelter / waiting area required.

Consideration:

This submission is noted and will be considered in the preparation of the Draft Clonmel Local Area Plan.

The LAP will include objectives that seek to address vacant and derelict buildings and sites. An evidence-based approach will be used to identify regeneration sites / consolidation sites or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration. The LAP will also seek to complement the County Development Plan with more town specific policies and objectives for active land management which will in turn support and underpin available funding streams, such as the Urban Regeneration and Development Fund.

In respect of Marlfield, the village is not within the development boundary of the Clonmel Town and Environs Local Area Plan, rather is covered under the Tipperary County Development Plan (CDP) 2022-2028. Volume 2 of the CDP 2022-2028 includes a 'Settlement Plan' for Marlfield, providing a guide, including objectives, for the development of the village during the CDP period.