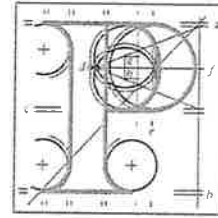


Our Case Number: ABP-318093-23



**An
Bord
Pleanála**

William Corby
Carrig Bán
22 Knockaun Court
Clonmel
Co. Tipperary
E91 X283

Date: 30 December 2024

Re: Proposed road development at The Quay, Quay Street, Suir Island and Raheen Road
The Quay, Quay Street, Suir Island and Raheen Road, Clonmel County Tipperary

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Niamh Thornton
Senior Executive Officer
Direct Line: 01-8737247

HA03

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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Carraig Ban
22 Knockaun Court
Clonmel
Co. Tipperary.
23rd December 2024

**Re: Case Number ABP 318093 -23 - Proposed Suir Island Infrastructure Links Project at The Quay,
Quay Street, Suir Island & Raheen Road Clonmel, Co. Tipperary**

A Chara,

Further to the latest round of Public Consultation following receipt of "Significant Further Information" from Tipperary County Council, my main concern remains as per my previous submission with regard to the knock-on effect of this project on the very fragile Primary Retail Area of the town by making a 1-way system on Quays from Sarsfield St to Bridge St junctions. This was not proposed at Masterplan stage in 2018 (See Section 4.1. of Masterplan Report which refers to leaving 2 way traffic in place). I understand the Masterplan was discussed with stakeholders at the time and is included with the information submitted to ABP on foot of the FI request.

You are no doubt aware how the Town Centre is suffering loss of retail activity and a lot of retail & business moving to periphery over past 20 years. Having worked in Planning Section as well as the Borough Council for part of my career & from living here for past 24 years and walking the Town centre at night, I'm very concerned about the ongoing deterioration with just a few relatively small units and some services remaining. See Vacant Unit survey undertaken in earlier submission. The Town centre is generally very quiet at night with very few restaurants and most businesses and pubs doing very little trade even with a new influx of inhabitants. Nearby towns like Kilkenny, Cashel and Dungarvan are thriving by comparison. Clonmel is lucky to have significant industrial base but after that most people are saying the town centre has been dying on its feet. I understand that the Council is awaiting significant Public Realm funding from Dept of Transport to rejuvenate various streets but there has been no sign of this funding over past few years since the Part 8 was approved. Hence the town centre remains very shabby with little short-term prospects for redevelopment of major shops and businesses. Even the initial rush since late 2023 to summer 2024 to clear derelict buildings at the Clonmel Arms Hotel site at junction of Sarsfield St and Quay Street has stopped and it appears that the 20-year wait for the hotel to re-open will continue.

I would be very loathe therefore as an Engineer/Planner to make any traffic changes that would cause further difficulties without ensuring detailed public consultation involving all stakeholders including the hotel developers. The current process of a referral to ABP only came about in September 2023 after the decision of ABP Board (not the Inspector) that an EIA was required. There does not appear to have been adequate time taken by Tipperary Co Co to review consultant's proposals before the project went on display a few days after the ABP decision. It is notable that only 2 local submissions were made to ABP by the closing date in December 2023 which would be unusual for a scheme of this magnitude in my view.

As discussed in Masterplan & shown on layout drawings there is sufficient road width available to retain a 2 way system along the building line of the quays and provide a sufficient area for the footbridge landing area. The landing area does not have to include a new public open space or "plaza" given that there are already several public performance areas in the town and another new one just completed at Abbey St car-park. No reference was made by the consultants to the number & availability of Plaza/Open spaces elsewhere and value for money aspects in constructing another one. The estimated cost of the footbridge project is €20million of which some €4 million is estimated for the new Northern Plaza. Ultimately if ABP grant this development it will be a decision for Tipperary County Council to proceed with the project. I consider that the Town centre and proposed hotel will suffer due to loss of over 30 parking spaces and particularly the loss of current 2 way system. The alternative routes involve quite long detours around the town and have not been fully considered by the consultants in the Traffic assessment. I have already suggested to my former colleagues that if the proposed North Plaza area and 1-way system without the footbridge could be put on display under Roads legislation / Part 8, it would be beneficial for all parties that a formal consultation has taken place. Blue light emergency services who have not contributed to the current process would also have an opportunity to give their responses before construction proceeds.

With regard to the request for Further Information issued to Tipperary County Council on 9/7/24, I had some queries/comments as follows:

1. Under Item 3(e) it is noted that revisions to Chapter 12 (Traffic Assessment) of the EIAR are sought to include for a detailed cumulative assessment of traffic at Construction Stage.
 - (a) Can ABP confirm if they are now satisfied with overall presentation of Chapter 12 and the information contained in a separate Traffic Impact Assessment. In my submission dated 17/12/23, I had highlighted various deficiencies with regard to Chapter 12 in how traffic was assessed i.e. the admission by the consultants that a 1 day traffic count was not ideal but that further surveys were not possible due to the Covid Pandemic. See Section 2.3 of Traffic Impact Assessment & Sections 12.6.4 & 12.6.5 of Chapter 12 of EIAR which relied on 1 day traffic counts and data collected for other projects.
 - (b) Are ABP satisfied that sufficient information is available to adequately assess the impact of a proposed 1-way system in the vicinity of the proposed "Northern Plaza" at Sarsfield St/Quay St junction? In my view Linsig Junction Analysis which is more typically used for Traffic signalised junctions should be replaced by alternative modelling systems and this calls into question if Paramics modelling software or similar is required to test various scenarios? In my opinion additional traffic modelling would better inform all parties to the effects of the proposed 1-way system on the Town Centre and proposed hotel development and take account of knock-on effects not already considered e.g. the new Town Bus Service routes launched in December 2023 which currently requires 2-way flow on O'Connell Street to be maintained. This is contrary to earlier proposals of the Clonmel Urban Design Project for a 1-way system (west to east) on O'Connell st which if implemented would impact other streets such as Quay St and calls into question if the proposed Northern Plaza should proceed or be scaled back. Also installation of Flood barriers on Oldbridge (southside) which temporarily blocks north-south traffic movements at that location during major flood events has not been assessed. I have highlighted these and other issues with regard to impact on schools in my earlier submission when commenting on traffic issues within the EIAR and I would urge ABP

satisfy itself that all knock-on effects of a proposed 1-way system have been adequately analysed within the current information without a further update being undertaken.

- (c) Are ABP satisfied that there has been sufficient correlation with the Traffic Assessment undertaken for the proposed Clonmel Arms Hotel development assuming a similar development to that granted in 2019 (PA 1860 1355)? Please note my earlier comments that an inaccurate count of available spaces at Suir Island was undertaken. I consider there was an opportunity afforded to Tipperary Co Co to submit unsolicited additional information in order to have a more robust traffic & parking assessment undertaken and to have errors in the earlier submission corrected with regard to parking availability at Suir Island car-park given there is private usage at Hughes Mill Apartments and new camper-van parking at the rear of the car-park. Sufficiently detailed and accurate data ought to be available to ABP as the Competent Authority before a decision is made on this project. The May 2022 EPA Guidelines on preparation of EIAR in compliance with the EU Directive indicate that Material Assets such as Traffic & Parking ought to have a thorough & impartial assessment in a similar fashion to all aspects of EIAR.
2. In my previous submission I also had highlighted that in selecting a particular layout for the proposed "Northern Plaza" of the footbridge project, the consultants failed to consider all alternatives and thereby the EIAR is incomplete and does not provide sufficient information to ABP as the Competent Authority. One such alternative that I suggested is a slimmed down landing area without a new "Performance Space" so as to permit retention of the 2-way traffic system and some parking at the junction of Sarsfield St and the Quay. Hence I consider all alternatives for the proposed Northern Plaza element of the footbridge project require detailed and impartial consideration in compliance with the EU Directive and as noted by the May 2022 Guidelines from the EPA.
3. With regard to new Local Area Plan for Clonmel 2024-2030 dated 25th March 2024, it is noted from Item 2 of the FI request that ABP sought an Addendum Report as Further Information to understand the Policy requirements and Key Planning Criteria for 2 regeneration sites (Site 3 Quay Street and Site 11 Suir Island Gardens). It appears the updated Policy & Key Planning Criteria for these sites now replaces earlier Planning Policy contained in the 2013 Clonmel & Environs Development Plan which had specific proposals for linking both sites. It is noted that proposals for Traffic Management changes and alternative Parking arrangements at the Quays as part of the Proposed Footbridge which were known about since at least mid-2023 were not referenced or incorporated into the new Local Area Plan. In my view this indicates a lack of coherence in Planning Policy for the Suir Island area when compared to the previous 2013 Clonmel & Environs Development Plan.

Yours sincerely

W. Corby

William Corby B.A.B.A.I., M.B.A. (Local Govt.)