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11<sup>th</sup> September 2023

**RE: Submission to the Draft Nenagh and Environs Local Area Plan 2024-2030.**

**SRA File Ref: LP 23/007**

A Chara,

I refer to your notice of the preparation of the Draft Local Area Plan (LAP) for Nenagh 2024-2030 received on 28<sup>th</sup> July 2023.

The Southern Regional Assembly (SRA) welcomes this opportunity to make a submission on the Draft Plan and commends the continued work being undertaken as part of the preparation of a new statutory LAP for Nenagh. This is an important next step in the strategic planning framework for Co. Tipperary following on from the adoption of the Tipperary County Development Plan 2022-2028, and recognition of Nenagh as a Key Town in the Regional Spatial & Economic Strategy for the Southern Region (RSES).

This submission is intended primarily to assist and support the Council in ensuring the principles set out in the LAP align with the Development Plan, RSES and National Planning Framework. It also intends to ensure Nenagh can maximise its potential and investment under Project Ireland 2040 and the National Development Plan and promote its transition to a more sustainable settlement pattern. The submission addresses the following themes:

A: Role of Nenagh as a Key Town

B: Town Centre First Approach and Compact Growth

C: Economic Development and Enterprise Strategy

D: Sustainable Transport and Mobility

E: Climate Action and Sustainability

F: Environmental Assessment

## **A: Role of Nenagh as a Key Town**

The SRA notes and welcomes the recognition of the role of Nenagh as a Key Town in the Draft Plan. Regional Policy Objective (RPO) 20 *Nenagh* of the RSES aims to:

- a. *To support and promote the role of Nenagh as a strategically located urban centre of significant influence in a sub-regional context and driver of county and regional prosperity by harnessing synergies to the Limerick-Shannon MASP, Galway MASP, its proximity to the Atlantic Corridor, its strong urban and economic structure and other competitive advantages;*
- b. *To support the delivery of the infrastructural requirements identified for Nenagh subject to the outcome of the planning process and environmental assessments. It is an objective to identify a location for a new centre of excellence for sustainable energy;*
- c. *To strengthen 'steady state' investment in existing rail infrastructure and seek investment for improved infrastructure and services to ensure its continued renewal and maintenance to a high level in order to provide quality levels of safety, service, accessibility and connectivity including improved frequency and journey times.*

The inclusion of these key aspects of the RSES in the various chapters of the Draft Plan are of key importance in ensuring it develops to its potential and grows in a planned and sustainable manner. In terms of the reference to the location of Nenagh in Section 1.4.1 *Location and Character*, it is worth noting that it is located in the Mid-West *Strategic Planning Area*, which is one of three sub-regional areas of the *Southern Region* as set out in the RSES, rather than the mid-west region.

## **B: Town Centre First Approach and Compact Growth**

In terms of the overall planning and development strategy for Nenagh, the SRA particularly welcomes the proactive approach shown by the inclusion of a specific chapter *Town Centre Strategy*, and the strategy statement: *The Town Centre Strategy for Nenagh will seek to ensure that the vibrancy and vitality of the town is maintained and enhanced. This will be achieved by increasing the residential population of the town centre, regenerating town centre brownfield lands, implementing and delivering the local town centre focused strategies for the town, and providing a high-quality, pleasant and enjoyable town centre environment focussed on active modes of travel.*

The success of the Council in attracting funding such as the URDF and RRDF to develop this framework is noted and will help achieve further success in this area. Continued investment and development of the historic core of the town including a heritage and tourism-led Historical and Cultural Quarter project and redevelopment of the Rialto Cinema site as an employment hub and housing are welcomed. The proposed Town Centre First Plan for Nenagh

as well as the various regeneration projects and strategies already being progressed will ensure the town centre will be revitalised. The SRA particularly welcomes the inclusion of Appendix 3: Schedule of Regeneration Sites as part of the Draft Plan in this regard. The importance of ensuring excellence in the design approach to developing these sites will be a key factor in attracting people to live, visit and work in Nenagh. RPO 31 *Sustainable Place Framework* of the RSES supports this approach, promoting the development of quality places through integrated planning and consistently excellent design. In addition RPO 34 *Regeneration, Brownfield and Infill Development* provides guidance on developing urban infill and brownfield sites. It is important that sites close or within the town centre are developed in line with these principles.

The SRA also commends the public realm enhancement schemes prioritising walking and cycling movements, widening footpaths, improving crossing points and establishing new connections, including the Nenagh Traffic Management Plan and the new public realm for Banba Square, O'Rahilly Street, and the areas around the Courthouse, the Castle and the Castle Field. This will assist in delivering on the 10 Minute Town Concept in accordance with the SRA's *10 Minute Towns Accessibility & Framework Report*, where short travel time and ease of access via sustainable travel modes is achieved between where we live, work, access services, access recreation and amenity.

In terms of compact growth targets, NPO 3c of the NPF and RPO 35 *Support for Compact Growth* of the RSES state that 30% of all new homes should be located within the existing built-up footprint of the settlement, which is defined as the CSO urban settlement boundary. Appendix 1: Serviced Land Assessment (SLA) of the Draft Plan states that consolidation and infill development underpin the development strategy of the LAP, with the principle of compact growth embedded in the SLA and resultant land zoning map. Section 5.2 Residential Development states that it is expected that more than 30% of new population growth will occur in the town centre (zoned Urban Core and Regeneration) and the neighbourhoods adjoining the town centre.

The Draft Plan sets out a requirement for approximately 44.4 ha. of serviced/serviceable residential lands by 2030 which accords with the figures for Nenagh set out in Table 2.4 *Core Strategy Table* of the Development Plan. However it is noted that the quantum of land zoned *New Residential* is stated as 60.05 ha. This is in addition to the land zoned Urban Core (44.62 ha. with a 30% residential share); and Regeneration (13.26 ha. with a 30% residential share), as well as Strategic Reserve (stated as being either 20.02 ha. on page 23, or 24.94 ha. on page 24; for long term strategic and sustainable development to deliver housing within the subsequent development plan period). To ensure consistency with the Core Strategy of the Development Plan, the amount of land zoned should be in line with the amount required as per the Development Plan methodology and clarification is sought on this point. This would also ensure that the plan aligns with its objectives of compact and sequential growth, embracing the Town Centre First approach.

It is noted that a residential density figure of 25 dph is used to apply to all lands where residential use is permitted, including the Urban Core and Regeneration. However consideration should be given to higher density targets particularly for sites within the town centre and close to public transport services. This would reflect the importance of Nenagh as a Key Town and align with the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)* (2009), which promotes higher densities for cities and larger towns (including towns with 5,000 or more people). It should

also be noted that the *Sustainable and Compact Settlements Guidelines for Planning Authorities (2023)*, which is currently at draft, public consultation stage, states that residential densities in the range of: 40-150 dph (net) be applied in town centres; 30-50 dph (net) generally be applied in suburban and edge locations; and up to 80 dph (net) open for consideration at accessible urban locations in Key Towns. The *Good International Practice: minimum densities for 10-minute city and town neighbourhoods* example included in Section 3.9 *Placemaking* of the RSES, notes how international experience shows that the critical density at which a large portion of people will change to accessing services by foot and bicycle is approximately 10,000-12,500 people per square kilometre.

### **C: Economic Development and Enterprise Strategy**

The SRA welcomes the inclusion of policies within the Draft Plan to promote Nenagh as an employment centre, recognising synergies with the Limerick-Shannon MASP, Galway MASP and its proximity to the Atlantic Corridor. Chapter 4 Economic Development Strategy recognises that the town has strengths in its strong local administrative and services base, and as a tourism driver as a heritage town that can benefit from recent investment in national tourism offerings including Fáilte Ireland's - Ireland's Hidden Heartlands. There is also a number of serviced business parks including the Stereame Business and Innovation Park, Lisbunny Industrial Estate and Gortlandroe Industrial Park. While the LAP supports the town centre as a key employment location with very good levels of physical, transport and social infrastructure, and the role of Nenagh as an employment centre in a sub-regional context should be promoted, it is important that sites close to the town centre are prioritised in the first instance rather than the development of peripheral lands, so that people living in the town can walk or cycle or people travelling to the town for work could use public transport rather than promoting more car-dependent developments.

### **D Sustainable Transport and Mobility**

The SRA welcomes the preparation of the Local Transport Plan for Nenagh as part of the LAP process. RPO 157 *Local Transport Plans (LTP)* of the RSES notes how LTPs maximise the opportunities for the integration of land use and transport planning, prioritise the delivery of sustainable and active travel, identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets and identify the transport interventions required within the plan area and in the wider context, to effectively accommodate the anticipated increase in demand. The preferred strategy of the Nenagh LTP promotes a positive modal shift to sustainable transport with active travel measures focusing on increasing walking and cycling mode share. Permeability links in the town centre to reduce walking distances and promoting a healthier lifestyle, while reducing the reliance on cars and decreasing traffic congestion is also promoted and welcomed.

In terms of improving future connectivity and removing vehicles from the town centre, the RSES supports a new link road between the N52 and R445, inner relief road from the R498 to the R445, as well as upgrading the R498 Nenagh to Thurles Road. RPO 168 *Investment in Regional and Local Roads* also supports the upgrade of the R498 Thurles to Nenagh.

## **E Climate Action and Sustainability**

The SRA welcomes the inclusion of policies in the Draft Plan on tackling climate change and transition to a low carbon economy including nature-based solutions, natural heritage and blue/green infrastructure. This includes the proposed Sustainable Energy Centre of Ireland, as a pilot centre for innovation in active and smart grid technology at the Martyr's Road Regeneration Quarter. The proposal for additional public open spaces, allotments and blue and greenways endorses the SRA's approach in promoting a Green and Liveable Region. The SRA's *Our Green Region - a Blue Green Infrastructure and Nature-based Solutions Framework for the Southern Region* would provide further support and guidance in developing this concept.

## **F Environmental Assessment**

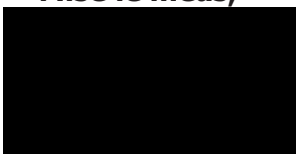
We note the preparation of Strategic Environmental Assessment (SEA) Reports, Natura Impact Report in support of the Appropriate Assessment (AA) and Strategic Flood Risk Assessment published alongside the Draft Plan. The Planning Authority should note that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Tipperary County Council review these documents to inform the Council's own environmental assessments and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final LAP where relevant.

## **Conclusion**

The SRA welcomes the public consultation at draft stage for the preparation of a new Local Area Plan for Nenagh.

Further engagement between the SRA as a key stakeholder and the Forward Planning Section of Tipperary County Council in the final phase of the Local Area Plan is encouraged. The RSES team is available for further consultation and for any clarification required regarding this submission.

**Mise le meas,**



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David Kelly

Director, Southern Regional Assembly