



Comhairle Contae Thiobraid Árann
Tipperary County Council

Chief Executive Report

Draft Nenagh & Environs
Local Area Plan 2024 - 2030

Tipperary County Council Planning Policy and Projects Unit

October 2023



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1.0 Introduction

1.1 Context

Tipperary County Council commenced the process of preparing a new Local Area Plan (LAP) for Nenagh on 28 July 2023 with the publication of a Section 20 notice and the Draft LAP. Once the new LAP is made and has effect, it will replace the Nenagh Town Development Plan 2013 (as varied).

The Draft LAP was made available for a period of 6 weeks from 28 July 2023 to 11 September 2023 and submissions were invited from stakeholders and the public during this time. This report provides a summary of the 37 submissions and observations received during the public consultation process and provides the Chief Executive's considerations and recommendations on the submissions and observations received.

1.2 Format of the Report

The report is set out over two parts:

- Part 1 sets out the process, legislative requirements, submissions received and the consideration and recommendations on these submissions.
- Part 2 provides a detailed list of all recommended changes to the Draft LAP arising from the consideration of submissions received.

1.3 Legislative Background and Requirements

Section 20 of The Planning and Development Act 2000 (as amended) ("the Act") sets out the requirement to prepare a Chief Executive's Report ("the CE's Report") following the public consultation period the Draft LAP, and no later than 12 weeks after the publication of the Draft LAP i.e. no later than 20 October 2023.

The CE's Report must: (i) provide a list of persons who made submissions or observations; (ii) summarise those submissions; and (iii) provide the opinion or recommendations of the Chief Executive in respect of those submissions raised.

1.4 Public Consultation

Section 20 of the Act sets out the requirements for local authorities in undertaking public consultation. As outlined above, the Draft LAP was available to view and make observations

on from 28 July 2023 to 11 September 2023. In addition to the statutory requirements, and to further make statutory bodies, residents, businesses and the local community aware of the Draft LAP, the following was undertaken:

- A public consultation drop-in event was held on Tuesday 22 August 2023 at Nenagh Library.
- The Public Participation Network (PPN) circulated details of the process to their members;
- Targeted letters were sent to local community groups;
- A dedicated webpage was published on the Tipperary County Council consultation portal;
- Regular updates and reminders were posted on the Council's social media pages;
- Posters were erected at various locations in the town;
- Articles on the Draft LAP consultation were published in the local press.

1.5 Submissions to the Draft LAP

37 submissions were received within the statutory consultation period. These are listed in Section 2. All submissions received are summarised in Section 2 of this report and a consideration and recommendation from the Chief Executive in respect of each is set out.

1.6 Environmental Assessment and Strategic Flood Risk Assessment

The Draft LAP has been subject to Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. As a result of these processes the following reports were published in support of the Draft LAP:

- Strategic Environmental Assessment Environmental Report (including a Non-Technical Summary),
- Appropriate Assessment Natura Impact, and
- Strategic Flood Risk Assessment.

Section 20(3)(f) of the Act requires a determination to be made as to whether Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) is required in respect of any proposed material alteration of the LAP. This process will be undertaken once the proposed material amendments are finalised following the Plenary Meeting on 27 October 2023.

1.7 Next Steps

This report is now submitted to the Elected Members of the Council for their consideration. A workshop will be held with the Elected Members of the Nenagh Municipal District on Wednesday, 11 October 2023 to facilitate consideration of this report and recommendations contained therein. The matter will be brought before the Elected Members at the Plenary Meeting on 27 October 2023.

As material amendments are recommended by the Chief Executive to the Draft LAP, a further period of public consultation for a minimum of 4 weeks is required. This is subject to the agreement of the Elected Members. Publication of the Material Amendments to the Draft LAP would take place from Friday 17 November 2023 until Monday 18 December 2023, if agreed.

2.0 Submissions Received

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

No.	Name	Submission Type
32.	Office of the Planning Regulator (OPR)	<u>Statutory Consultees, State Bodies and other Government Departments (14)</u>
27.	Southern Regional Assembly (SRA)	
35.	National Transport Authority (NTA)	
11.	Transport Infrastructure Ireland (TII)	
14.	Department of Transport (DoT)	
26.	Office of Public Works (OPW)	
1.	Environmental Protection Agency (EPA)	
29.	Uisce Eireann (UE)	
38.	Department of Housing, Local Government & Heritage (DoHLGH)	
25.	Department of Environment, Climate and Communications (DoECC)	
16.	Department of Education (DoE)	
10.	Department of Defence (DoD)	
30.	Electricity Supply Board (ESB)	
15.	An Post	
17.	Nenagh Lawn Tennis Club	<u>Local bodies (1)</u>
5.	Dr. Mary Ryan	<u>Zoning Related Submissions (7)</u>
18-21.	Lisbunny Development Limited	
22.	Chris Lind	
33.	Tom D'Arcy	
36.	Andrew Mackey	
37.	Thomas Harty & Pauline Harty	
40.	Allied Metals Recycling	
2.	Emer O'Neill	<u>Individual Submissions (15)</u>
3.	Emer O'Neill	
4.	Gearoid Fitzgibbon (SEAI Tipperary County Sustainable Energy Community Mentor)	

6.	Thomas & Pauline Harty	
7.	Siobhan Cuddy	
13.	Siobhan Cuddy	
8.	Angela Ryan	
9.	Angela Ryan	
12.	Shane Egan (Tipperary Energy Agency)	
23.	Thomas Bibby	
24.	Michael O'Connor	
28.	Rosemary Joyce	
31.	Louise Morgan Walsh (Labour Party)	
34.	Iva Pocock (Green Party)	
39.	Cllr John Carroll (On behalf of the residents of Benedine & Ballintoher)	

2.1 Statutory Consultees, State Bodies and Government Departments

Submission Number: 32	Submission Name: Office of the Planning Regulator (OPR)
Submission Summary: <p>The submission outlines the OPR's function in the assessment of statutory plans under the Planning and Development Act having regard to the TCDP, RSES and Section 28 Guidelines. Recommendations therein relate to clear breaches of policy and S28 guidelines and observations relate to a request for further information, clarity or justification of particular provisions.</p> <p>The OPR considers the Draft LAP to be generally consistent with overarching regional policies and to have been undertaken collaboratively and with a clear emphasis on town centre regeneration. Five recommendations and two observations were identified in the submission under the following headings.</p> <p><u>1. Consistency with development plan core strategy, residential zoning and compact growth.</u></p> <p>The submission notes that the proposed land use zonings for residential development exceed the TCDP core strategy housing target for Nenagh, due to historic zoning provisions, but that in general terms, the Draft LAP provides a reasonable approach to ensure a sufficient supply of zoned land with well-located sites identified for development. However, there are some instances where new residential sites are peripherally located or where Strategic Reserve sites are more centrally located:</p> <ul style="list-style-type: none">• Site 16 (2.14 ha – T2) and Site 17 (1.37 ha – T2): both of these sites are located on the western periphery of the settlement and are identified as T2 lands. Given the distance of these lands from the urban core, the location of sequentially preferable sites, and the fact that they are designated T2 lands, consideration should be given to designating these lands as Strategic Reserve.• Site 30 (2.16 ha - T2): this site is located on the southern periphery of the town. It is immediately adjacent to an area identified as being located within flood zone A. Given the distance of these lands from the urban core, the location of sequentially preferable sites, and the fact that they are designated T2 lands, consideration should be given to designating these lands as Strategic Reserve. <p>Furthermore, on review of the SLA and the zoning map the Office has concerns regarding the number of smaller peripheral sites zoned Existing Residential in the environs of the town. It is considered that these small pockets of isolated one-off dwellings undermine the principles of</p>	

compact growth and sequential development. The approach to zone individual dwelling houses has the potential to undermine the overall policy intent of the Town Environs land use zoning objective as it raises unreasonable expectations about further one-off housing and subdivision in isolated areas which are divorced from the built-up area.

Further anomalies between the zoning map and SLA were also noted in relation to Sites 11-14, 19-26, 29, 32, 34 and 40.

Recommendation 1 – Residential Zoning Objectives

Having regard to the provision of new homes at locations that can support compact and sustainable development, the co-ordination of land use zoning, infrastructure and services, and in particular to:

- the core strategy of the Tipperary County Development Plan 2022-2028 and the otherwise sufficient supply of land zoned for residential use;
- NPO 3c, NPO 6, RPO 3, RPO 20 and RPO 35 for compact growth;
- the policy and objective for a sequential approach to development in Section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities (2022)*;
- *Local Area Plans, Guidelines for Planning Authorities (2013)*, chapter 6; and NPO 72 for tiered approach to zoning,

The Planning authority is required to:

- i. review the land use zoning approach in respect of Existing Residential development and Strategic Reserve lands to ensure that the most sequentially appropriate sites that promote consolidated forms of development and compact growth are given priority;
- ii. delete the New Residential zoning objective for sites 16, 17 and 30. Consideration should be given to amending the zoning to either Strategic Reserve or Town Environs;
- iii. amend the Existing Residential land use zoning objectives on lands associated with the isolated pockets of rural dwellings predominately located to the peripheries of the LAP boundary to Town Environs to ensure consistency with the approach to one-off housing in the town set out in section 5.2.3 and Policy 5.3 of the draft LAP; and
- iv. review the SLA Table 1 and Map in Appendix 1 of the draft LAP, the zoning map and the written statement to ensure consistency and accuracy, particularly with regard to sites identified as New Residential and which are identified as Existing Residential on the zoning map; that the site boundaries of the SLA map are consistent with the extent of New Residential lands identified on the zoning map and that there is a consistent approach regarding the identification of sites as sequentially appropriate.

2. Tiered approach to zoning and infrastructural capacity

The SLA states that a recent update to the capacity register conducted by Uisce Éireann has indicated that there is currently no additional wastewater treatment capacity in the Nenagh WWTP. The update confirms that there will be an additional 19,000PE available once the Nenagh WWTP has been upgraded.

The Office understands, however, that Uisce Éireann has identified additional capacity to accommodate a certain level of growth in the interim period until the upgrade works are completed. It is important, however, that clarity is provided in the LAP regarding the nature and extent of this significant infrastructural constraint for both developers and the community.

Recommendation 2 – Infrastructure Capacity

Having regard to the co-ordination of land use zoning, infrastructure and services, and in particular to:

- the significant infrastructural constraints associated with the existing Nenagh Waste Water Treatment Plant and the timetable for upgrade works;
- the core strategy of the Tipperary County Development Plan 2022-2028 (the Development Plan) and Objectives SO-2 and 4 – A;
- *the Development Plans, Guidelines for Planning Authorities (2022)* and Sections 6.1 and 6.2 of the *Local Area Plan Guidelines for Planning Authorities (2013)*;
- NPO 72a-c for tiered approach to zoning; and NPO 63 for the sustainable use and development of water services infrastructure, and section 15.2.2 and objective 15 – A of the Development Plan,

The planning authority is required to set out a clear policy framework on this matter addressing the potential constraints to development over the plan period and measures to ensure that ad-hoc wastewater treatment on an individual site basis is avoided.

The planning authority should consult with Uisce Éireann regarding this recommendation.

3. Economic development and employment

The evidence-base and rationale underpinning the zoning of employment uses should be clear and strategic in nature and should seek to cater for the sustainable delivery and provision of employment led uses as well as supporting a live-work community.

Considering the significant scale of the Gortlandroe Industrial Park land bank (c. 35 ha) and its proximity to the national road network, the Office recommends that the planning authority gives further consideration to the intended phasing approach for these lands as well as the proposed delivery of sustainable transport measures in accordance with the LTP to ensure that development occurs in an appropriate and sequential manner in accordance with the principles of sustainable development.

The Office also has concerns regarding the lands zoned for employment located to the east of the town identified as Site 6 in the SLA. This site is peripherally located with no access to the foul sewer network and no active travel infrastructure.

Recommendation 3 – Employment Zoning Objectives

Having regard to:

- section 6.2.5 of the *Development Plan Guidelines for Planning Authorities (2022)* that the evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature;
- RPO 151, RPO 154 and National Strategic Outcome 1 for Compact Growth, and NPO 74 to secure alignment with delivery of National Strategic Outcomes;
- the location of employment in areas that can support more sustainable transport options in accordance with NPO 54 for climate action and the sequential approach and accessibility set out in section 1.4 of Appendix A of the *Development Plans, Guidelines for Planning Authorities (2022)*, *Climate Action and Low Carbon (Amendment) Act 2021* and the *Climate Action Plan 2023* and the goals of the *National Sustainable Mobility Policy (2022)*; and
- NPO 72a-c and Appendix 3 of the NPF and the co-ordination of land use zoning, infrastructure and services,

the planning authority is required to:

- i. review the proposed phasing approach to the delivery of the Gortlandroe Industrial Park to ensure that development is delivered in an appropriate and sequential manner. The planning authority should also consider the intended movement patterns to / from and within the site in accordance with the adopted LTP, as well as activation measures to ensure that the site is comprehensively developed as a major employment location in tandem with appropriate active travel measures; and
- ii. omit the Employment zoning objective for Site 6 and consider amending the zoning objective to Town Environs.

4. Flood risk management

The Office welcomes the preparation of a SFRA to inform the draft LAP and the inclusion of objective 8D relating to the proposed flood relief scheme. However, there appear to be issues with the mapping of flood risk zones and the planning authority is advised to review flood risk designations for some Regeneration Sites in Appendix 3. Some Justification Tests for Existing Residential lands have not been included in the SFRA and CFRAM mapping is required to be overlaid on the land zoning with the SFRA, as stated within the Draft LAP.

Recommendation 4 – Flood Risk Management

Having regard to flood risk management, and in particular to:

- RPO 114 and RPO 116; and
- NPO 57 and *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) as amended by *Circular PL 2/2014*,

The planning authority is required to:

- i. review and update the Strategic Flood Risk Assessment to ensure that the flood zone mapping estimates the full extent of potential flood risk and excludes the presence of flood defences in accordance with the guidance set out in section 2.25 of the guidelines. Clarity should also be provided in the SFRA regarding residual risk for lands that are considered to benefit from existing defences;
- ii. review and update the Strategic Flood Risk Assessment to ensure that the 1% AEP extents are used to inform the flood zone mapping, i.e. Flood Zone A;
- iii. having regard to the corrected flood zone mapping, review the flood zone designations for all sites contained in Appendix 3: *Schedule of Regeneration Sites*. The planning authority's attention is specifically drawn to the following sites which are located within flood zone B when they should have been located in flood zone A:
- iv. review the methodology and approach included in the SFRA to ensure that justification tests are completed for all land zonings that overlap with flood zones and to ensure that such tests are only carried out when avoidance and substitution of the of the flood risk is not possible; and
- v. ensure that overlays of land use zoning and National CFRAM potential future scenario mapping are included in the SFRA. Consequent to the above, the planning authority is required to omit or amend zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Guidelines.

The planning authority should consult with the Office of Public Works regarding this recommendation.

5. Transport and mobility

The Office welcomes the preparation of the LTP.

It is noted however, that while policies and objectives supporting the LTP have been included in chapter 6 of the draft LAP, including Policy 6.2 which supports the implementation of the active travel and demand management measures identified in the LTP, improved integration and synergy could be provided between the LAP and the LTP, together with a clearer policy approach to provide more explicit support to the proposed interventions.

Recommendation 5 – Local Transport Plan

Having regard to:

- NPO 27 and RPO 152 which seek to prioritise walking and cycling; and
- RPO 157 for local transport plans, and the policies, objectives and measures
- emerging from local transport plans,

the planning authority is required to include specific actions in the written statement of the LAP with respect to the key actions identified in the Nenagh Local Transport Plan (LTP) 2024 – 2030 in order to clearly outline the guiding principles for improved permeability and sustainable land use and transportation management for Nenagh and to ensure that a cohesive land use strategy for the town is clearly set out.

Observation 1 – Transport and Mobility

Having regard to the provision of sustainable transport options, and in particular to:

- NPO 27, NPO 54 and NPO 64;
- RPO 20, RPO 157 and RPO 168; and
- the Nenagh Local Transport Plan (LTP) 2024 – 2030,

the planning authority is requested to:

(i) review chapter 6 – Transport and Connectivity to provide clearer policies, objectives and mapping regarding the delivery and phasing of the key infrastructural requirements of the LTP, particularly those interventions and measures required to enhance active travel and promote demand management; and

(ii) consider including on the land use zoning map the indicative route alignment of the proposed:

- the Thurles Road (R498) to the Dublin Road (R445);
- the Dublin Road (R445) to the Borrisokane Road (N52) and

- the Thurles Road (R445) to the Limerick Road (R445).

6. Implementation and monitoring

A general objective is included to undertake a programme of monitoring and evaluation of the LAP over its lifetime in accordance with the monitoring framework and methodology prepared for the Development Plan.

However, the draft LAP does not provide any tangible indicators for monitoring the objectives of the LAP, just a broad statement of intent aligned with a generalised approach in the Development Plan.

Observation 2 – Monitoring and Implementation

Having regard to section 6.5 of the *Local Area Plan Guidelines for Planning Authorities (2013)* the planning authority is advised to include a clear implementation and infrastructural delivery schedule in the LAP to ensure that the implementation of the policy objectives of the local area plan will take place and to ensure that development progress is consistent with the core strategy of the Development Plan.

7. General and procedural matters

In respect of more minor matters, the Office draws your attention to the following matter for your consideration:

- greater clarity could be provided on the land use zoning map regarding the colour tones used to distinguish between sites zoned for Mixed Use, Amenity, Open Space and Recreation and Town Environs. The colour tones used to identify these zonings may give rise to confusion in identifying the specific land use objective(s).

Consideration:

Recommendation 1 – Residential Zoning Objectives

It is noted and welcomed that the Office is satisfied that the population and housing growth for the plan period is consistent with the Development Plan and that in general terms the draft LAP provides a reasonable approach to ensure a sufficient supply of zoned land. The points made in respect of the Local Transport Plan (LTP) and Serviced Land Assessment (SLA) undertaken to inform the zoning provisions of the draft LAP is welcomed.

The Land Use Zoning approach has been reviewed on foot of this recommendation (and noting other submissions received to the Draft LAP). This review has resulted in the land use zonings for lands to the west and south of the town being amended 'New Residential' to 'Strategic Reserve'

in line with the recommendations of the OPR, and lands to the south and peripheral areas of the town being changed from 'Existing Residential' to 'Town Environs'.

It should be noted that a significant number of submissions were received on the Draft Clonmel LAP (which was published at the same time as the Draft Nenagh LAP) relating to the need to include for a 'social' need to be included for persons wishing to reside in the 'Town Environs'. A similar issue arose in the recent development of the Roscrea LAP and a restrictive policy was included in the making of that Plan. To provide consistency between all of the local area plans in Tipperary, to address this 'social' need whilst limiting development in the 'Town Environs' areas of the local area plans and provide for sustainable future growth of the towns, it is recommended that Policy 5.3 of the Draft LAP is amended (it should be noted that the numbering of policies in Section 5.8 is incorrect and requires revision so this policy will be numbered 5.2).

The SLA table has been reviewed. This table will be updated to take account of the points raised and ensure consistency and accuracy. With regard to the land boundaries in the SLA and zoning, because of the extent of flood risk on Site 26, only part of this site is zoned for 'New Residential'. With regard to Sites 25 and 40, the boundaries of these sites are amended in the SLA and the tables updated accordingly.

Recommendation 2 – Infrastructure Capacity

The planning authority has engaged with Uisce Éireann regarding this recommendation. Uisce Éireann have made recommendations to update the Draft LAP to reflect the limited capacity within the municipal WWTP and it recommended to accept these amendments to the Draft LAP and SLA in full. It is further recommended that Policy 8.2 of the Draft Plan is amended to ensure the integrity of the municipal waste water treatment plant and system in Nenagh is not compromised by new development. Together with other processes and safeguards in place outside the LAP (for example, the connection enquiry processes of Uisce Éireann), it is considered that such amendments would address the recommendation, to the satisfaction of Uisce Éireann.

Recommendation 3 – Employment Zoning Objectives

With regard to the development of the Gortlandroe Industrial Estate, it is considered an appropriate location for new employment development with close access to the required transport infrastructure, reasonably proximate to the town centre and to provide a geographical balance to the other strategic employment sites in the town. Development in this location would also consolidate an existing employment location, improving the overall quality of the site as an employment location.

The availability of significant landbanks of employment lands is a requirement to support the sustainable growth of the town. Though Nenagh is one of the fastest growing towns in the mid-west region (62% increase in population from 2002 to 2022), the town has a limited number of large-format manufacturing / industrial employers. As noted in the submission from the IDA to the Draft Clonmel LAP, within the Mid-West region it is vital that an appropriate quantum of employment zoned lands of scale be identified to facilitate employment growth in the Mid-west region commensurate with projected population increase, set out within the Tipperary County Development for Nenagh . The absence of large-scale employers locating within the town means that a significant proportion of the population commute to Limerick / Shannon metropolitan area for employment - 17% of trips with 99% of these commuting trips by private car¹ - which has negative impacts on the environment and the vibrancy of the town.

Nonetheless, it is accepted that this land bank is significant in scale and should be developed in a cohesive and integrated manner to ensure the sustainable development of this area of the town. In order to address this, it is considered that the Draft LAP should be amended to ensure that development of a masterplan for these lands, prior to further development of this area. A masterplan will be required to address the phasing of the lands, active travel and transport and connections to the town centre, access arrangements, specify land use zones, provision of amenities and relationships with neighbouring land uses etc.

For similar reasons to the points outlined above, Nenagh is required to maintain strategic employment to support new development in the town. Though it is noted that Site 6 in the Employment Lands SLA does not have access to waste water services (as it lies on the southern / eastern side of the railway), this site is located just beyond the 10-15 min walk time distance of the town centre. The development of a segregated cycleway is included as a short-term measure of the LTP to within 100m of the lands. The lands have proximate access to water, water run-off to the nearby rivers (subject to environmental assessment), power (critical sub-station infrastructure is located nearby) and broadband – all infrastructure attractive to industry. Though the land does not currently have access to the municipal waste water system, the lands are highly serviceable in all other respects. It is accepted that these lands could not be developed without access to the municipal waste water system, and therefore it is recommended that the Draft LAP is amended to make it clear that development should not occur on this site in advance of

¹ Sourced from the Baseline Data Report of the Local Transport Plan

connection to the municipal waste water system and the delivery of other active travel infrastructure.

Recommendation 4 – Flood Risk Management

A detailed response to all issues pertaining to flood risk is provided in the response to the Office of Public Works (OPW) submission (see Submission 26), including recommendations to amend the Draft LAP and SFRA.

Recommendation 5 – Local Transport Plan

The points raised in relation the Local Transport Plan are accepted and a detailed response to the recommendations is provided in the response to the submission by the National Transport Authority (NTA), Department of Transport and Transport Infrastructure Ireland (see Submissions 11, 14 & 35), including recommendations to amend the Draft LAP and LTP. It should, however, be noted if the LTP is adopted alongside the LAP as an appendix to the LAP (and this is the intention), the LTP will have policies and objectives included in the LTP that will have statutory effect in the same way as the policies and objectives of the LAP. One of the core objectives in developing this LAP is that is accessible, concise and easy to use. For these reasons, though further information around the LTP is recommended to be included in the LAP, it is not intended to replicate large elements of the LTP within the LAP.

Observation 1 – Transport and Mobility

This is noted. The proposed routes will be mapped and included in a figure within Section 6.4.1 of the LAP.

Observation 2 – Monitoring and Implementation

This is noted. It is recommended that a table is included in Chapter 10 which identifies all of the objectives included in the plan and provides comment on how these objectives will be delivered.

General and procedural matters

This comment is noted and it is accepted that the colour tones for land uses in some cases are quite similar. However, these are the RGBs indicated that should be used in the Development Plan guidelines in order to provide consistency throughout the country. Nonetheless, the Council will commit to reviewing these colours, and whether it is appropriate to alter colour tones, to ensure clarity once the Plan is adopted.

Recommendation:

Each of the following zoning changes [points (i) to (v)] are mapped at Part 2:

- i. Amend the zonings of peripheral rural houses from 'Existing Residential' to 'Town Environs', including the sites referred to as Sites 32 and 34 in the SLA (see Amendments 58 & 63 in Part 2);
- ii. Amend the zonings of Sites 16, 17 and 30 in the SLA from 'New Residential' to 'Strategic Reserve' (see Amendments 59 & 60 in Part 2);
- iii. Amend the zoning of Site 39 in the SLA from 'Strategic Reserve' to 'New Residential' and 'Open Space and Recreation' – also see Submissions 17 & 30 from Nenagh Lawn Tennis Club and Tom D'arcy (see Amendment 57 in Part 2);
- iv. Amend the zonings of Sites 13, 14, 15, 19, 21, 22, 29 and 36 in the SLA from 'Existing Residential' 'New Residential' (see Amendment 64 in Part 2);
- v. Amend the zoning of lands at Tyone, addressing in part the request set out in Submissions 18-21 (Lisbunny Developments Limited) (see Amendment 61 in Part 2);

Other non-zoning related changes:

- vi. Amend Policy 5.3 to include provision for 'social' need in limited circumstances in 'Town Environs' (see Amendment 16 in Part 2);
- vii. Amend Tables 7 and 8 in the Draft LAP and Section 2.4.4 to reflect the revised quantum of land zoned (see Amendments 6 & 7 in Part 2);
- viii. Amend tables, text and maps within sections 2.2, 2.4, 3.2 and 4.0 of the SLA to reflect zoning quantum changes, and to provide updates and consistency in the SLA (see Amendments 43-51 in Part 2);
- ix. Amend Section 8.2.2 of the Draft LAP, Policy 8.2 of the Draft LAP, and Section 2.3 of the SLA to reflect revised position in relation to waste water treatment in the town, and need to safeguard the integrity of the waste water system in the town – see Submission 29 from Uisce Eireann (see Amendments 32, 36 & 45 in Part 2);
- x. Amend Section 4.2.1 (Lisbunny Industrial Estate) to include need for waste water services to be delivered to Site 6 in the SLA (Employment Lands) prior to development of the lands (see Amendment 11 in Part 2);
- xi. Amend Section 4.2.3 (Gortlandroe Industrial Park) to provide context on the need for consolidation of employment in this location, as well developing a masterplan to guide the sequential and sustainable implementation of development of these lands (see Amendment 12 in Part 2);
- xii. Amend the Land Use Zoning maps to update flood risk areas (now including 'defended areas') and update the SFRA to update Justification Tests and future flood risk modelling scenario – see Submission 26 from the OPW (see Amendments 54, 56 & 65 in Part 2);

- xiii. Amend Chapter 6 to add additional sections to provide information on Future Demand for Travel, Options Development & Implementation, and include additional measures in the Draft LAP to reflect and strengthen the role of the LTP in future development proposals (see Amendments 21, 23 & 24 in Part 2);
- xiv. Amend Section 6.4.1 to include a map showing the proposed roads development strategy outlined in the LTP (see Amendments 25 in Part 2);
- xv. Amend Policy 6.2 to make reference to Figure 6.11 included in the LTP (See Amendment 27 in Part 2)
- xvi. Add policy to Section 6.6 to support the implementation of public transport measures (See Amendment (See Amendment 28 in Part 2)
- xvii. Add policy to Section 6.6 to support the implementation of demand management measures (See Amendment (See Amendment 29 in Part 2)
- xviii. Amend Section 10.2 to provide a table of all objectives in the Draft LAP and a proposed monitoring programme for each of these objectives (see Amendments 41 & 42 in Part 2)

Submission Number: 27	Submission Name: Southern Regional Assembly (SRA)
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Submission Summary:

The submission sets out recommendations in the interest of ensuring the LAPs consistency with the TCDP, RSES and NPF under a number of themes summarised below:

Role of Nenagh as a Key Town

The submission quotes RPO20 which is the Nenagh based objective in the RSES. It advocated for the inclusion of the key aspects of these objectives throughout the DLAP and suggests it is worth noting at section 1.4.1 that Nenagh is notes that located in the Mid-West Strategic Planning Area.

Town Centre First Approach and Compact Growth

The submission welcomes the specific Town Centre Strategy chapter. The success of the Council to secure Project Ireland funding is noted. The submission welcomes the inclusion of Appendix 3: Consolidation and Regeneration Sites also in this regard which aligns with RPO 31 Sustainable Place Framework and RPO 34 Regeneration, Brownfield and Infill Development. The submission notes the importance of developing sites close to or within the town centre.

The submission commends the public realm enhancement schemes that prioritise sustainable transport, the Nenagh Traffic Management Plan and new public realm for the Historical and Cultural Quarter that is proposed. The adoption of the 10-minute town concept for Nenagh is also welcomed.

In terms of compact growth, the RSES states that 30% of all new homes should be located within the CSO urban settlement boundary. The DLAP states that it is expected that more than 30% of new population growth will occur in lands zoned Urban Core and Regeneration and neighbourhoods adjoining the town centre with a focus on high density, well connected, high quality urban housing.

The DLAP sets out the requirement for 44.4ha of serviced/serviceable residential land by 2030 with the quantum of land apportioned to residential zonings being 60.05ha in addition to 44.62ha Urban Core (with 30% for residential) and 13.26ha for Regeneration (30% Residential). There is also 24.94ha dedicated to Strategic Reserve. To ensure consistency with the TCDP the amount of land zoned for residential purposes should be in line with its core strategy and clarification is sought on this point. This would also ensure alignment with compact growth, sequential development and Town Centre First.

It is noted that a density figure of 25dph is used to all Residential zoned lands including Urban Core and Regeneration. Higher density targets should be considered, particularly on sites close to the town centre or public transport routes. The submission notes existing and draft guidelines for sustainable residential development along with Section 3.9 Placemaking on the RSES which advocate for higher densities in Key Towns.

Economic Development and Enterprise

The SRA welcomes the inclusion of policies within the DLAP to promote Nenagh as an employment centre recognising synergy with the Limerick-Shannon MASP, Galway MASP and its proximity to the Atlantic Corridor. 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. In line with TCF approach, 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.

Sustainable Transport and Mobility

The SRA welcomes the preparation of the Local Transport Plan for Nenagh as part of the LAP process. 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.

Climate Action and Sustainability

The submission welcomes the inclusion of policies in the Draft Plan on tackling climate change and transition to a low carbon economy.

Environmental Assessment

The submissions advise that the Council should review the environmental and flood risk reports associated with the RSES to ensure conformity and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final LAP.

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.

Consideration:

Role of Nenagh as a Key Town

The points regarding the strengthening of Nenagh's role as a Key Town particularly in chapters 1 & 2 are noted and amendments are made to the text to reflect this.

Town Centre First Approach and Compact Growth

The positive comments regarding the Draft LAPs town centre strategy are noted and welcomed. With regards to the quantum of lands zoned for new residential development:

- The TCDP 2022 Core Strategy Framework has been adjusted to account for the LAP timeline.
- Section 4.4.3 of the Development Plans-Guidelines for Planning Authorities (DHLGH, 2022) states that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded.
- Section 4.4.1 of the above Guidelines further state *that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning.*

Regarding the comments on the draft LAPs density figure of 25dph, this figure is for indicative purposes only and represents an average density throughout the LAP. It is intended that higher density developments in alignment with key national policy will be provided for as a development management function.

Economic Development and Enterprise

The points made regarding the economic development strategy are noted and welcomed. As outlined in the submission, the Draft LAP supports the town centre as key location for employment, thought the strategic employment locations will also play a critical role in the sustainable growth of the town.

Sustainable Transport and Mobility

The points made regarding the Local Transport Plan are noted and welcomed.

Climate Action and Sustainability

The points made regarding the Draft Plan provisions on climate action and sustainability are noted and welcomed.

Environmental Assessment

The points made regarding statutory environmental assessments and the content of environmental assessment undertaken as part of the RSES preparation are noted.

Recommendation:

- i. Amend Section 1.4.1 of the Draft Plan to make reference to Nenagh as being located within the Mid-West Strategic Planning Area (see Amendment 4 in Part 2)

Submission Number: 35	Submission Name: National Transport Authority (NTA)
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Submission Summary:

General Comments

NTA is supportive in principle of the approach taken in the preparation of the Plan, and in particular, the development of the LTP. There are a number of recommendations provided, though the NTA is of the view that the Draft LAP provides a good basis for the future development of Nenagh based on the integration of land use and transport planning.

Introductory Remarks

The ABTA process is designed to be iterative with the LAP preparation being informed by and, in turn, informing the development of transport policies and objectives. The ABTA process also envisages that future iteration between statutory plans and transport studies would be informed by the monitoring and evaluation stages of the LAP.

The NTA support the high-level objectives presented at the start of Chapter 6 and would also acknowledge that the policies and objectives align in large measure with the recommendations of the LTP. However, it is recommended that:

- a greater level of cross referencing between the LAP written statement and the LTP is included in this and other chapters;
- Chapter 6 would benefit from the inclusion of greater detail on the proposed measures;
- The Structure and content of Chapter 6 is reviewed to reflect the LTP;
- explanation of how policies have been derived is provided;
- the final LAP explicitly distinguishes between the LTP measures that are inside the LAP boundary and those outside

Active Travel, Movement and Accessibility

Chapter 6 would benefit from the inclusion of greater detail on the proposed measures. It is also recommended that that a specific policy should be included in the LAP that supports and commits to the *Safe Routes to School* programme.

Transport Hub

NTA recommends that LAP and LTP should consider further the needs of pedestrians and cyclists on the approaches to the rail station, in particular at the roundabout adjacent to the station entrance, and that these matters should be resolved prior to the development of a transport hub at the station.

Demand Management

The NTA would recommend that the LTP and LAP should include a commitment to the development of a town centre Parking Strategy, which would consider the potential for the migration of on-street car parking to sites on the town centre edge. Where feasible, parking facilities would be located on active travel routes to facilitate onward journeys by active modes and should consider the provision of e-charging facilities.

The NTA recommends that a policy regarding the provision of secure, public cycle parking at key destinations should be included in the final LAP and LTP. Such a policy should note that the implementation of cycle parking, particularly if provided as clusters, must take account of Universal Design principles to ensure that it does not discommode disabled pedestrians, wheelchair users, or pedestrians with visual impairments.

Road Strategy

In general, it is recommended that greater alignment is established between the roads proposals set out in the LTP/LAP and the goal of managing general vehicular capacity elsewhere, such that there is, at a minimum, no increase in general vehicular car capacity in the LAP area. The NTA also recommends that the LAP should include a policy stating that the implementation of active travel measures is not contingent on the completion of new roads schemes, and that the development of new/improved roads and delivery of active travel measures should happen in parallel.

Nenagh Traffic Management Plan (TMP)

Following the Traffic Management Plan should through-traffic be reduced or substantially removed from the town centre, the NTA recommends that there would be an opportunity for further road space reallocation to sustainable modes, public realm improvements or social uses, and that the provisions of the TMP may therefore merit re-examination.

Consideration:

General Comments

Noted.

Introductory Remarks

Noted. Comment relating to the requirement to review Chapter 6 of the Draft LAP to further reflect the LTP is reasonable and Chapter 6 will be updated to further reflect the LTP. Nonetheless, one of the overarching objectives for the LAP is that it is concise, non-technical, user friendly, and does

not repeat policy or information that is available elsewhere. With this in mind, it is not intended to replicate, wholesale, information and policies included within the LTP, though it is accepted that further information could be contained within Chapter 6 and policies could be strengthened.

With regard to the iterative process of the ABTA, the Active Travel team and consultants have been engaged throughout with the planning team in developing the respective plans to ensure the process has been iterative and will continue to utilise the evidence base through the monitoring processes.

With regard to the boundaries of the LAP and LTP, and the environmental assessments, this point is accepted and the Plan will be amended to make it explicit that the environmental assessments only relate to measures within the LAP boundary.

Transport Hub

The LTP recommends the delivery of segregated cycle routes along Martyrs Road, in addition to the delivery of filtered permeability measures on Abbey St and Friars Lane which will substantially improve active travel access between the train station and town centre.

The roundabout adjacent to the train station entrance is currently being reconfigured and upgraded as part of developments at the Arrabawn Co-op site. The upgrade works includes the provision of raised pedestrian crossings, prioritising the movement of vulnerable road users.

As part of delivering the active travel network for Nenagh Town, key junctions will be examined and upgraded to ensure continuity of the network, ensuing accessibility for pedestrians and cyclists.

Demand Management

Objective DM7 of the LTP supports the use of existing and potentially new car parks on the periphery of the town centre for Park and Stride facilities, to further enhance and safeguard the economic viability of the town and its sustainable development. As acknowledged within the LTP, the implementation of segregated cycle facilities within the town centre, in addition to public realm proposals, will result in the reallocation of road space and may result in the reduced level of on street parking within the town centre thereby further supporting the park and stride objective contained within the LTP. It is not considered that an additional parking strategy is required to support the implementation of the LTP.

The LTP recommends the provision of quality, secure cycle parking in Nenagh Town Centre and at other key locations in order to meet future demand. As noted by the NTA, a specific objective will be included in the LTP, to recommend high quality secure cycle parking at appropriate locations to be delivered in line with guidance set out within the National Cycle Manual.

Road Strategy

Section 6.4 of the LTP sets out the sustainable transport objectives by which each of the road proposals were assessed. These objectives are aligned with local and national policy in particular the modal and intervention hierarchy set out in NIFTI. As noted by the NTA, the delivery of these schemes through the planning process will need to continue to demonstrate adherence to these sustainable transport objectives, aligned to national climate action policy.

Nenagh Traffic Management Plan

It is a recommendation of the Local Transport Plan that further public realm and active mode enhancements be investigated within Nenagh town centre, particularly with the development of the Historical Quarter and regeneration of the Town Centre Laneways.

Recommendation:

- i. Amend Footnote 1 to reflect the differing boundaries of the LAP and LTP and environmental implications (see Amendment 2 in Part 2);
- ii. Amend Chapter 6 to add additional sections to provide information on Future Demand for Travel, Options Development & Implementation, and include additional measures in the Draft LAP to reflect and strengthen the role of the LTP in future development proposals (see Amendments 21, 23 & 24 in Part 2);
- iii. Amend Section 6.4.1 to include a map showing the proposed roads development strategy outlined in the LTP (see Amendment 25 in Part 2);
- iv. Amend Policy 6.2 to make reference to Figure 6.11 included in the LTP (See Amendment 27 in Part 2)
- v. Add policy to Section 6.6 to support the implementation of public transport measures (See Amendment (See Amendment 28 in Part 2)
- vi. Add policy to Section 6.6 to support the implementation of demand management measures (See Amendment 29 in Part 2)
- vii. Amend Appendix 2: Local Transport Plan as follows:
 - A specific objective will be included in the LTP, to recommend high quality secure cycle parking at appropriate locations to be delivered in line with guidance set out within the National Cycle Manual (see Amendment 53 in Part 2)

Submission Number: 11	Submission Name: Transport Infrastructure Ireland (TII)
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Submission Summary:

Development Strategy and National Roads

Welcome Section 6.5 and Policy 6.7 of the Draft LAP

Local Area Plan / Local Transport Plan integration

The Draft Local Transport Plan includes a number of measures that impact the strategic national road network in the Plan area, for example,

- Figure 6.11 indicates segregated active travel measures along the N52 west and north of Nenagh, and
- Figure 6.12 shows an indicative location of a Bus Stop on the N52 on the Borrisokane Road at a location where a 100kph speed limit applies

While TII welcomes the reference in Section 6.5 of the Draft Local Area Plan, it remains the requirement that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).

In particular, the provision of a new bus stop on a national road at a location where a 100kph speed limit applies requires careful consideration. Such an approach is not in the interests of road user safety and new bus stop locations are generally encouraged to site off the high-speed national road network. TII recommends early consultation with the NTA and the Council prior to advancing any proposals in this regard to ensure road safety considerations are reflected in all stages of decision making and appropriate TII Publications safety and design standards are applied.

In the interests of clarity and in TII’s opinion, although referenced elsewhere in the Draft Local Transport Plan, Table 2.1 would benefit from update to include reference to the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012)

Specific Local Area Plan Objectives

There is a significant landbank of employment lands at Gortlandroe, and though it is noted that the LAP refers to access via St Conlon’s Road, it is recommended that an evidence base is developed to address the requirements of the Dept of Environment, Community and Local Government guidelines with respect to these lands.

Maintaining the Strategic Capacity and Safety of the National Road Network

TII requests that the Council give due consideration to reflecting the requirements of Section 3 of the DoECLG Spatial Planning and National Roads Guidelines in the Local Area Plan prior to finalisation. The Council are requested to reference the TII Traffic & Transport Assessment Guidelines (2014).

Objective 6F is welcomed with regard to signage

TII would welcome the following objective to be included: 'The capacity and efficiency of the national road network drainage regimes in Tipperary will be safeguarded for national road drainage purposes'.

TII would welcome an objective being included in the Plan to safeguard the national road network where grid connection cabling is required to service renewable energy development.

TII request reference statutory instrument SI140 of 2006 with regard to environmental noise is included in the Plan.

Other Matters

In relation to Greenway proposals, consultation with the Councils own internal project and/or design staff is recommended.

Consideration:

Development Strategy and National Roads

Noted

Local Area Plan / Local Transport Plan integration

The Draft LTP measures have been developed at a strategic level in accordance with national and regional policies. Any specific projects taken forward for implementation along national roads will be required to follow all TII guidelines and publications including the requirement for a Design Report as noted in the submission.

The location of proposed bus stops within the LTP is indicative in nature. The exact location of proposed bus stops will need to be considered in consultation with the NTA and TII. The design of the bus stop will need to meet all safety standards set out by TII, and in particular will need to adhere to guidance on bus stop locations in rural areas, prepared by the NTA. It is worth noting

the proposed national revision of speed limits on secondary roads (from 100kph to 80kph) may assist with the implementation of a safe bus stop at this location.

As outlined in TII's submission, a reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) will be included in Table 2.1 of the Draft LTP.

Specific Local Area Plan Objectives

Please note response provided to the OPR submission under Recommendation 3.

Maintaining the Strategic Capacity and Safety of the National Road Network

These points are noted. However, compliance with most of the standards or guidelines referenced is a prerequisite for all development proposal in any event and there would be no practical effect of inclusion of these references, objectives or policies whilst making the Plan longer, more technical and difficult for users to read. It is, however, recommended to add an additional policy within Section 6.6 of the Plan to require grid connection routing for renewable energy development proposals should avoid materially impacting the road network, where possible.

Other Matters

We can confirm that the Greenway team within Tipperary County Council were consulted as part of developing the draft LTP.

Recommendation:

- i. Amend Chapter 6 to add additional sections to provide information on LTP Objectives, Future Demand for Travel, Options Development & Implementation and amend Policy 6.2 to strengthen the role of the LTP in future development proposals (see Amendments 21, 23 & 24 in Part 2);
- ii. Add policy in Section 6.6 relating to grid connections (see Amendment 30 in Part 2);
- iii. Amend Appendix 2: Local Transport Plan as follows:
 - Table 2.1 of the LTP will be updated to include a reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). (see Amendment 52 in Part 2)

Submission Number:	Submission Name:
14	Department of Transport (DoT)
Submission Summary:	

The submission outlines the Department of Transport's observations on the Draft Nenagh and Environs LAP.

Since the previous LAP there have been important policy developments relevant to accessible, integrated and sustainable public transport which should be reflected in the proposed plan.

Sections 3.4: 'Public Realm and Wayfinding', 5.3: 'Open Spaces and Amenities', 5.5: 'Nenagh as an Age Friendly and inclusive Town', and section 6.2: 'Public Transport', should include material on UNCRPD, Universal Design, Whole Journey Approach, and to make specific reference to the 'Design Manual for Urban Roads and Streets interim note'.

Accessible public transport for All, and especially for Persons with Disabilities, Reduced mobility and Older People.

- The "whole of Government" National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities i.e. including for dishing of footpaths to allow accessibility. DoT welcomes Section 5.5 Nenagh as an Age Friendly Town.
- The UN Convention on the Rights of Persons with Disabilities (UNCRPD) ratified by Ireland in 2018 puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas.
- DMURS Interim advice Note 2020 includes guidance on accessibility – references to DMURS 2019 in the draft LAP should be updated with reference to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.
- To make public transport fully accessible to people with disabilities requires a 'whole journey approach'. This refers to all elements that constitute a journey. Local Authorities should implement a universal design approach to the built environment'.
- The Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity throughout the country.

DoT can assist with appropriate text in the development plan regarding integrated, accessible public transport.

Consideration:

As noted above in response to the NTA submission, one of the overarching objectives for the LAP is that it is concise, non-technical, user friendly, and does not repeat policy or information that is available elsewhere. With this in mind, it is not intended to replicate information and policies included and available elsewhere. Nonetheless, it is accepted that further reference to the 'whole journey' approach should be included within the Draft LAP.

Recommendation:

- i. Amend Section 6.2 to make reference to Universal Design, Whole Journey Approach, and the 'Design Manual for Urban Roads and Streets interim note' (see Amendment 22 in Part 2).

Submission Number: 26	Submission Name: Office of Public Works (OPW)
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Submission Summary:

Introduction

The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes:

- The commitment to managing flood risk in line with the Guidelines, Policy 8.5
- Policy 8.4 and Objective 8B in relation to integrating SuDS and nature-based solutions into all development proposals and new public realm and public sector development
- Objective 8D in relation to the proposed flood relief scheme in Nenagh

Flood Zones

The National CFRAM extents have been used to inform the Flood Zones for Nenagh. It would appear that an area of Flood Zone A has been omitted from a section of the Flood Zone Mapping. Tipperary should review and update the mapping. There are regeneration sites in Appendix 3: Schedule of Regeneration Sites which are described as being within Flood Zone B, however they are also located within Flood Zone A such as the sites at the Coalyard, Tyone, Martyr's Road and Dublin Road.



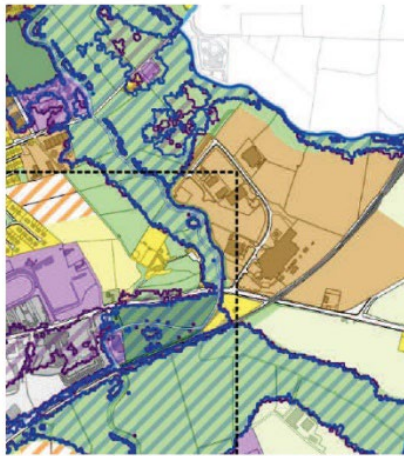
Floodinfo, 1% and 0.1% AEP flood extents



SFRA, Flood Zones A and B

It should be noted that the Flood Zones are defined ignoring the presence of flood defences (Section 2.25 of the Guidelines). The Flood Zones are underestimated at one location in the draft

plan in the draft plan as they have excluded areas benefitting from flood defences from the Flood Zones.



Zone Mapping



National CFRAM PDF Map, showing defended areas

As the National Indicative Fluvial Mapping data has not been included in Appendix II: Flood Risk Indicator and Zone Mapping of the SFRA, it is difficult to assess if the 1% AEP extents for the National Indicative Fluvial Mapping Programme have been considered when producing the Flood Zones on the Zone Mapping



Floodinfo, Present Day 1% and 0.1% AEP extents



SFRA, Flood Zones A and B

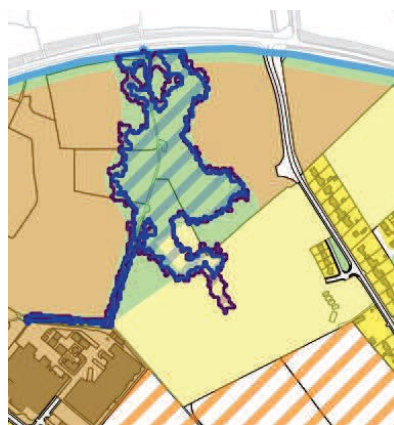
Justification Test

The OPW welcomes the Plan-making Justifications supplied for Nenagh.

Residential Zoning

There is a Residential zoning to the north west of the town, which fails the Plan-making Justification Test however planning permission has already been granted. It is recommended these lands are re-zoned. If it is not possible to avoid these flood risk lands due to the planning permission having been granted then Tipperary County Council should include discussion on the proposed mitigation

measures, demonstrate that the flood risk can be managed within the site and that climate change has been considered. If the lands within Flood Zone A and B are not developed before the planning application expires then Tipperary County Council should rezone these lands as a water compatible type zoning such as Open Space. If it is not possible to avoid these flood risk lands due to the planning permission having been granted then Tipperary County Council should include discussion on the proposed mitigation measures, demonstrate that the flood risk can be managed within the site and that climate change has been considered.



Existing Residential Zonings

Not all existing developed Residential lands that are located within Flood Zone A and B have been included in the Plan-making Justification Tests. Tipperary County Council should review that Justification Tests are completed for all land zonings that overlap with the flood zones, where avoidance or substitution is not possible.

Town Environs

The OPW welcomes the Note on Land Use Zoning Objectives and Matrix in the draft Plan, which outlines that uses shall be limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B, except where a Justification Test has been satisfied.

Flood Relief Scheme

The OPW welcomes Objective 8D to support the design, development and implementation of the Nenagh Flood Relief Scheme. Tipperary County Council might also consider including a register of other key flood risk infrastructure in the Local Area Plan where it would not otherwise be readily identified or protected from interference or removal.

Arterial Drainage Scheme

The OPW acknowledges Policy 11-11 (a) of the County Development Plan that Tipperary County Council will ensure that proposed development does not have an impact on Arterial Drainage Schemes and Drainage Districts. As there is an Arterial Drainage Scheme in Nenagh Tipperary County Council might consider if this policy objective from the County Development Plan should be included in the Local Area Plan.

Consideration of Climate Change Impacts

While future scenario mapping for the National CFRAM Study has been provided in the SFRA, it has not been overlaid with the land use maps. The OPW welcomes that Tipperary County Council has considered climate change in the preparation of this plan by “avoiding development in areas potentially prone to flooding in the future”. The OPW also welcomes Policy 8.5 (d) that requires lands subject to mid-range future scenario flood extents to submit a site-specific flood risk assessment.

Nature Based Solutions and SuDs

The OPW welcomes Policy 8.4 that requires all developments to integrate SuDS and nature-based solutions and Objective 8B to integrate a nature-based solutions approach to SuDS as part of new public realm and public sector development. The OPW also welcomes the SuDS techniques outlined as applicable for sites that are in high groundwater levels, steeply sloping, very flat and areas in floodplains in Section 3.5 Sustainable Drainage Systems and Surface Water Guidance and Strategy of the SFRA. Further guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites such as at the twelve regeneration sites or the large land zonings may be considered, where integrated and area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Errata

There is a reference to an OPW website www.cfram.ie in Table 3 Predictive Flood Risk Indicators of the SFRA, this website is no longer available. The OPW recommend referencing www.floodinfo.ie.

Consideration:

Introduction

Noted

Flood Zones

The CFRAM 10% AEP and 1% AEP in the centre of town have been relegated to Flood Zone B due to the burial of the Clareen stream through town, thought to have skewed the model.

It is also proposed to amend Policy 8.5 of the Draft LAP and section 2.2 of the SFRA to make reference to defended areas.

Justification Test

Noted. Justification tests are recommended to be updated in the SFRA.

Residential Zoning

As noted in the submission, the lands referred to already benefit from planning permission, which considered the site-specific flood risk on the lands. Nonetheless, if that planning permission were to be amended, it offers the opportunity to ensure that best practices in relation to the mitigation of flood risk is identified. Section 8.5 will be updated to reflect this requirement.

Existing Residential Zonings

The Justification Test table (Table 4) in the SFRA is recommended to be updated to ensure all existing developed Residential lands located within Flood Zone A and B have been included.

Town Environs

Noted.

Flood Relief Scheme

Noted. Amend Objective 8D in the Draft Plan.

Arterial Drainage Scheme

All new development proposals within the boundary of the Nenagh and Environs Local Area Plan 2024-2030 are required to be assessed in accordance with the provisions for the County Development Plan, including Policy 11-11 (a).

Consideration of Climate Change Impacts

Noted. The reference to the 2009 OPW Draft Guidance included in the SFRA is from the County Development Plan and it is not within the scope of this process to amend it. However, reference to the more recent Climate Change Sectoral Adaptation is also provided in the County Development Plan and has been provided in both the Draft Local Area Plan and accompanying SFRA.

Nature Based Solutions and SuDs

The submission welcomes Policy 8.4 and Objective 8B that relates NBS and the SuDS techniques outlined in Section 3.5 of the SFRA. The submission notes that further guidance on the applicability of different drainage techniques for key development sites, such as regeneration and consolidation sites, may be considered where integrated or areas-based provision of NBS/SuDS might be appropriate.

Errata

Noted. Update reference in the SFRA

Recommendation:

- i. Update Figure 11 with revised Flood Zones (see Amendment 33 in Part 2);
- ii. Amend Section 8.5 of the Draft LAP to make reference to (i) where flood risk occurs, and planning permission has already been granted, and (ii) reference to protection of flood defences (see Amendments 34 and 35 in Part 2);
- iii. Amend Policy 8.3 to make reference to section 3.5 in the SFRA (see Amendment 37 in Part 2);
- iv. Amend Objective 8D to make reference to the protection of flood infrastructure (see Amendment 40 in Part 2);
- v. Amend Section 2.2 of the SFRA (see Amendment 54 in Part 2);
- vi. Update reference to predicative flood indicators in the SFRA (see Amendment 55 in Part 2);
- vii. Amend the Land Use Zoning maps to update flood risk areas (now including 'defended areas') and update the SFRA to update Justification Tests and future flood risk modelling scenario – see Submission 32 from the OPR (see Amendment 56 & 65 in Part 2)

Submission Number:	Submission Name:
1	Environmental Protection Agency (EPA)

Submission Summary:

The submission describes the statutory function of the EPA under the Strategic Environmental Assessment (SEA) Regulations and advises that for plans at county and local level the recommendations of the “*SEA of Local Authority Land Use Plans - EPA Recommendations and Resources, 2023*” publication, are considered in finalising the LAP.

The submission advises that the Council ensure the plan aligns with relevant higher-level plans and Programmes and is consistent with the relevant objectives and policy commitments of the

National Planning Framework (NPF) and Southern Regional Spatial and Economic Strategy (RSES).

The submission outlines the content that is required to be contained in the SEA Environmental Report, i.e. Assessment of Alternatives, Assessment of Environmental Effects, Mitigation Measures, Monitoring and provides information on SEA related monitoring.

The submission recommends that:

- the State of the Environment Report – Ireland’s Environment 2020 (EPA ,2020) is considered in preparing and finalising the SEA and LAP.
- Any future amendments to the LAP are screened for likely significant effects of the environment.
- An SEA Statement should be prepared once the plan is adopted and a copy of same sent to environmental authority consulted during the SEA process.

Consultation is undertaken with the EPA, certain Government Departments and adjoining Planning Authorities contiguous to the area for which a draft plan is being prepared.

Consideration:

The points made in the submission are noted.

The ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’ document has been considered in the preparation of this SEA Scoping Report and will be kept on file for reference throughout the SEA process.

The SEA will seek to ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region.

Content of the Environmental Report

The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the Regulations.

Assessment of Alternatives

The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under “Assessment of Alternatives” - refer to Sections 6 and 7 of the SEA Environmental Report.

Assessment of Environmental Effects

Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under “Assessment of Environmental Effects” - refer to Sections 7 and 8 of the SEA Environmental Report.

Mitigation Measures

Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under “Mitigation Measures” - refer to Sections 8 and 9 of the SEA Environmental Report. The Plan mitigation measures have been integrated into the Plan.

Monitoring

Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under “Monitoring Measures” - refer to Section 10 of the SEA Environmental Report. The Plan mitigation measures have been integrated into the Plan.

State of the Environment Report – Ireland’s Environment 2020

The recommendations, key issues and challenges described in the EPA’s State of the Environment Report – Ireland’s Environment 2020 have been taken into account during the preparation of the Plan and undertaking of the SEA.

Future Amendments to the Plan

Any future amendments will be screened for likely significant effects as required.

SEA Statement – “Information on the Decision”

An SEA Statement will be prepared including the required information and taking into account the EPA guidance on SEA Statements.

Environmental Authorities

The relevant environmental authorities have been consulted with as part of the Plan preparation/SEA process.

Recommendation:

No changes to the Draft LAP recommended.

Submission Number: 29	Submission Name: Uisce Eireann (UE)
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Submission Summary

Uisce Éireann welcome the opportunity to comment on the draft LAP and provided observations under the following headings:

Sustainable Drainage and Green-Blue Infrastructure

The submission encourages the inclusion of policies and objectives to support SuDs and GBI in all new developments including public realm and retrofitting projects. These measures are cost effective, sustainable, climate positive and remove surface water from combined sewers. The submission notes that the discharge of additional surface water to foul sewers will not be permitted in order to preserve capacity. UÉ welcomes the inclusion of Nature Based Solutions objectives in the LAP and would be happy to collaborate with TCC on projects that would remove stormwater from combined sewers as well as in progressing NBS in the LAP area.

Planned Road and Public Realm Projects

These have potential to impact upon UÉ assets. The Martyr's Road Masterplan, Nenagh Town Centre First Plan and the GBI Masterplan Roadmap for Tipperary Waterways are examples of projects that may impact assets. Development in the vicinity of UÉ assets must be in accordance with UÉs Standard Details and Codes of Practice. Diversion Agreements will be required where an UÉ asset needs to be diverted or altered. Early engagement is requested.

Zoning

Network extensions may be required to service some zoned sites. Depending on the extent of development proposals, localised network upgrades may also be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. Sections of the wastewater network are 100mm or 150mm in diameter, and sections of the watermain network are less than 80mm within Nenagh; therefore, localised upgrades are likely to be required to facilitate future development.

The submission encourages phased sequential development in areas with existing water services infrastructure and spare capacity. The discharge of additional surface water to combined (foul and surface water) sewers is not permitted. Where network reinforcements such as upgrades, or extensions are required, these shall be developer driven unless there are committed UÉ projects in place to progress such works.

All new residential, commercial and industrial developments seeking connections will be assessed on a case by case basis which are subject to the Connections Charging Policy. Third party agreement will be required where new development is to be serviced via private property/private infrastructure. This may apply to a number of residential and Employment sites.

Existing watermains and sewers (which run through a number of zoned sites) need to be protected. Where assets need to be altered or diverted, a diversion agreement may be required. Future development of lands close to the WWTP must take account of the established use of the WWTP and potential for expansion of same. UÉ has a policy to facilitate connections to existing infrastructure where capacity exists, alternative proposals for private wells or treatment plants will generally not be considered.

Water Supply Infrastructure and Constraints

The latest water supply capacity register, published in June 2023, indicates there is sufficient capacity to cater for the projected growth within the lifetime of the LAP. Currently it is envisaged that capacity is available to cater for the population targets identified to 2030. Local network upgrades may 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.

Wastewater Collection and Treatment

A project is currently underway by Uisce Éireann to provide additional capacity at Nenagh Wastewater Treatment Plant (WWTP), with an application for planning permission due to be submitted in the first half of 2024. Project delivery timeframes for the project will be available when the investment planning process, which is currently underway for the next Capital Investment Plan (2025-2029), has concluded. The upgraded plant will have sufficient capacity to cater for the projected growth to 2030 and beyond. In the interim, while the planned upgrade project is progressing, the existing WWTP has available capacity for 927 Population Equivalent (PE).

A Drainage Area Plan, incorporating a Wastewater Infrastructure Plan, has been completed for Nenagh agglomeration, identifying upgrade needs to cater for growth and alleviate hydraulic and environmental constraints. Currently it is envisaged that capacity is available to cater for the population targets identified to 2030. 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.

Other Comments

Suggested amendment to Section 8.2.2 to reflect the current available capacity at Nenagh Wastewater Treatment Plant and the status of the treatment plant upgrade:

“Uisce Éireann is responsible for the collection, treatment and disposal of public wastewater. A planned upgrade of the Nenagh Wastewater Treatment Plan is currently underway by Uisce Éireann to increase the capacity of the plant. An application for planning permission for the upgrade works is due to be submitted in the first half of 2024. Project delivery timeframes for the project will be available when the investment planning process, which is currently underway for the next Capital Investment Plan(2025-2029), has concluded. Project timelines are subject to planning approvals and statutory consents being obtained. The upgraded plant will have sufficient capacity to cater for the projected growth to 2030 and beyond. In the interim, while the planned upgrade project is progressing, the existing WWTP has available capacity for 927 Population”

Amend Appendix 1: Serviced Land Assessment, Section 2.3 for the same reason:

“A planned upgrade of the Nenagh Wastewater Treatment Plan is currently underway by Uisce Éireann to increase the capacity of the plant. An application for planning permission for the upgrade works is due to be submitted in the first half of 2024. Project delivery timeframes for the project will be available when the investment planning process, which is currently underway for the next Capital Investment Plan (2025-2029), has concluded. Project timelines are subject to planning approvals and statutory consents being obtained. The upgraded plant will have sufficient capacity to cater for the projected growth to 2030 and beyond. In the interim, while the planned upgrade project is progressing, the existing WWTP has available capacity for 927 Population Equivalent (PE). For the purpose of the SLA assessment, where waste water capacity.....”

UÉ Capital Investment Plan

Uisce Éireann’s Investment Plan is the budgetary plan for the five-year period from 2020 to 2024 inclusive. Preparation for the next Investment Plan period, 2025 to 2029, is currently underway.

Submission Summary

Sustainable Drainage and Green-Blue Infrastructure

The comments are noted.

Planned Road and Public Realm Projects

These comments are noted, and developers and the Council will be encouraged to engage at an early stage in the development of proposals

Zoning

These comments are noted.

Water Supply Infrastructure and Constraints

Comments are noted and welcomed.

Wastewater Collection and Treatment

Comments are noted. With regard to development proposals, and for further response on this comment, please see response to 'Recommendations 2' of the OPR Submission (Submission 32) and associated recommendations for changes to the Draft LAP detailed above.

Other Comments

Proposed suggested wording is noted and is recommended to be incorporated in full in the amendments.

UÉ Capital Investment Plan

Uisce Éireann's Investment Plan is the budgetary plan for the five-year period from 2020 to 2024 inclusive. Preparation for the next Investment Plan period, 2025 to 2029, is currently underway.

Recommendation:

- i. Amend Section 8.2.2 of the Draft LAP, Policy 8.2 of the Draft LAP, and Section 2.3 of the SLA to reflect revised position in relation to waste water treatment in the town, and need to safeguard the integrity of the waste water system in the town – see Submission 32 from the OPR (see Amendments 32, 36 & 45 in Part 2)

Submission Number:	Submission Name:
38	Department of Housing, Local Government & Heritage (DoHLGH)

Submission Summary

The Department welcomes the opportunity to comment on the draft LAP. The Department notes that there are no specific objectives/policies within section 7.3 relating to Nenagh's archaeological (including underwater) heritage. The Department notes the absence of archaeological heritage related policies and objectives and requests that the Council considers strengthening as follows:

Definition of Archaeology and Archaeological Heritage

It is important that the LAP is informed by a clear understanding of the nature of archaeology and archaeological heritage and the legislation that underpins them. While both have been described

in detail in the SEA it is recommended that a brief statement should be included in Section 7.2 Archaeology:

Archaeology is the study of past societies through their material remains and the evidence of their environment. It is not restricted solely to ancient periods; it includes the study of relatively recent societies through, for example, industrial and military sites.

The archaeological heritage is comprised of all material remains of past societies with the potential to add to our knowledge of such societies. It therefore includes the remains of features such as settlements, monuments, burials, ships and boats and portable objects of all kinds, from the everyday to the very special. It also includes evidence of the environment in which those societies lived.

Archaeological heritage occurs in all environments, urban and rural, upland and lowland, grassland, tillage and forestry, inland and coastal, dryland, wetland (including peatlands) and underwater (including watercourses, lakes and the sea).

Archaeological heritage may exist in the form of upstanding or visible remains, or as subsurface features with no surface presentation.

Given the above, archaeological heritage is present as yet unidentified in all environments.

Legislation relevant to the protection of the archaeological heritage

The SEA includes a reference to 'national monuments' in its archaeology map when the legal term is 'recorded monument'. The map is poor in distinguishing the ZAP around the historic town, it is recommended that a standalone map is included which highlights all recorded monuments, ZAPs, national monuments and wrecks. The wreck records for the relevant planning area could also be included. The submission draws attention to provisions relating to the protection of archaeology set out in, the Planning and Development Act, The Environmental Impact Assessment Directive, the International Conventions, and the Framework and principles for the Protection of Archaeological Heritage.

It is recommended that at the outset Section 7.2 should include an over-arching objective for the protection of the archaeological heritage, this objective should ideally relate to the TCDPs archaeological heritage objectives.

Suggested recommendations for additional archaeological policies that may be of relevance to the Nenagh Local Area Plan 2024-2030

A number of further archaeological policies and objectives are outlined in the submission with the aim of strengthening the LAPs priorities for archaeology.

Recommended Climate Change Policies and Objectives for Archaeological Heritage

Further suggested policies and objectives relating to climate change and archaeological heritage.

Consideration:

Archaeological and architectural heritage come under the scope of the SEA, as detailed throughout through the SEA Environmental Report. The Draft LAP and associated TCDP include various provisions that contribute towards the appropriate protection of the environment, including archaeological heritage. Section 13 of the TCDP provides for built heritage throughout the county. The policies and objectives set out under Chapter 13 provide for the safeguarding of archaeological heritage, these policies and objectives are applicable to the Nenagh LAP area.

The LAP mapping includes a standalone Built Heritage map detailing the ACAs and recorded monuments in the LAP area. The point regarding the mis-labelling of recorded monuments as national monuments is noted and actioned.

Recommendation:

- i. Amend the Built Heritage Map with the label 'Recorded Monument' in place of 'National Monument' (See Amendment 66 in Part 2)

Submission Number:	Submission Name:
25	Department of Environment, Climate and Communications (DoECC)

Submission Summary

The submission requests that points made in the submission is taken into consideration when drafting the Nenagh LAP:

- i. Climate Action-The submission welcomes reference to the Climate Action Plan (CAP) 2023 and requests that the LAP is drafted in a manner consistent with the CAP. The submission notes and support the inclusions of actions from the CAP 2023 and TCDP, in particular compact growth and sustainable mobility and sustainable transport measures (Section 2.2) and the support to reduce car dependency and promotion of active travel and public transport (Policy 6.1).
- ii. Renewables- The submission welcomes and supports the transition to renewable energy, in particular Section 8.1 Energy Demand and Renewable Energy and Policy 8.1. The LAP should have regard to updated renewable energy targets under the CAP 2023.
- iii. Built Environment and Heating- The submission notes and supports Policy 2.1 (retrofitting of existing structures), Policy 2.3 (low-carbon and energy efficiency) , Objective 2A (reduce energy consumption, produce renewable energy) and Section 8.1 Energy Demand and

Renewable Energy. The submission encourages further consideration with regard to the energy efficiency of existing residential buildings and notes the provisions of the CAP 2023 for electrification of heating under the National Residential Retrofit Plan.

- iv. District Heating- The submission welcomes and supports the compact growth provisions of the Draft LAP (Section 2.4.4 and Policy 3.1) and opportunity from compact growth to develop district heating networks. The submission notes provisions of the NPF and RSES for the South Region as they relate to district heating. The submission requests more explicit policies in support of district heating are included in the final LAP and encourages the potential of district heating from waste heat to be examined.
- v. Telecommunications -The Draft LAP should support national policy objectives in terms of digitalisation, 5G rollout and enhancing Ireland’s national and international connectivity. The submission requests that ducting inventories be published and a streamlined process to allow for easy connectivity be developed.
- vi. Waste and the Circular Economy - The submission welcomes and supports Objective 8C (sustainable management of waste). The submission recommends consultation with the Regional Waste Management Planning Office regarding development of the final LAP. The submission references the provisions of the *“Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects”* and requests that same be incorporated into the policies of the LAP.

Consideration

The points made in the submission will be addressed in the order in which they are presented.

- i) Climate Action- The Draft LAP has been prepared in a manner consistent with the National Climate Action Plan (CAP). Reference to the alignment between the Draft LAP and the CAP is clearly set out under Section 2.2 of the Draft LAP. The submission notes the Draft LAP includes actions from the CAP.
- ii) Renewables-The points made in the submission regarding renewables is noted, as is the reference to energy targets under the CAP.
- iii) Built Environment and Heating- The points made regarding further consideration with regard to the energy efficiency of existing residential buildings is noted. In this regard an additional line can be added to Objective 2G to reference the electrification of heating under the National Residential Retrofit Plan.
- iv) District Heating - Section 5.1 of the Draft LAP recognises the potential for district heating (as part of a local renewable energy system) to become a feature of towns such as Nenagh. Section 8.1 supports the transition to renewable energy (generated locally) for heating and

transport. Policy 8.1 supports the use of renewable energy technologies at appropriate scales and Objective 2A supports measures and actions to reduce energy consumption, produce renewable energy from local resources and to adapt to a changing climate, in accordance with the Tipperary Climate Action Plan 2023 (when complete). An additional objective is added with regard to District Heating and how the Council might provide support in delivering district heating.

- v) Telecommunications-Section 5.7 and Objective 5F of the Draft LAP set out the policy context on telecommunications infrastructure. Section 5.7 cross references Policy 6-6 of the TCDP. The content of the Draft LAP regarding Telecommunications is considered adequate.
- vi) Waste and the Circular Economy- The points made regarding Objective 8E are noted and welcomed. There is no statutory requirement to consult with a Regional Waste Management Planning Office as part of the preparation of a LAP.

Section 8.4 of the Draft LAP sets out an objective of the Council to support the sustainable management of waste and the reduction in the production of waste in Clonmel in line with the National Waste Management Plan for a Circular Economy (Government of Ireland, 2022) and associated guidance across the delivery of its services and in the management of new development. The referenced to associated guidance addresses the submission requirements.

Recommendation:

It is recommended that the following is undertaken:

- i. Objective 2G is amended to reference electrification of heating under the National Residential Retrofit Plan. (See Amendment 9 in Part 2).
- ii. Objective 2H is added with regard to District Heating (See Amendment 10 in Part 2).

Submission Number: 16	Submission Name: Department of Education (DoE)
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Submission Summary:

The submission notes the TCDP population targets of 2,690 people for Nenagh between 2016 and 2031. The Department considered this data and made this submission based on the potential population growth within the town and its environs between 2022 and 2031. The Department has now applied the growth figure of 11,658 to 2031 along with the 2022 Census figure of 9,895 for Nenagh in order to determine that the potential projected growth figure for Nenagh between 2023 and 2031 now stands at 1,763 persons.

There are eight schools in Nenagh town. The Department’s preference would be to expand these schools should there be a requirement for additional space as a result of population increases and

requests that TCC ensures there are adequate land buffers around each of the primary schools in order to allow for expansion.

The Department notes the initial submission made by them to the pre-draft stage of the LAP which is set out in Chapter 5 of the draft LAP under the heading Adequacy of Existing School Places. In terms of school place requirements, the Department re-affirms the position in this submission.

Section 5.4.1 Primary and Secondary Schools states that according to DoE school place requirements are calculated as 11.5% of the population and 25 students per classroom from primary schools and 7.5% of the population for post-primary schools. The submission notes that these criteria are regularly reviewed. As a result the primary percentage figure has changed to 10.25% with a pupil ratio of 23:1 for the 2023/24 school year, these figures are subject to further future changes. The Department requests that the text be amended to reflect these changes. The submission notes and welcome that the schools are identified in the LAP and appropriate buffers are applied to facilitate growth. The submission notes and welcomes Policy 5.5 and Objective 5C for the continued expansion of existing schools.

The Department notes and welcomes Table 6.2 Nenagh Schools and the Active Travel Network in Appendix 2. Measures identified include a range of Safe Routes to School connections from key residential areas in the study area, more bicycle parking, new pedestrian crossings, permeability improvements and enhanced walking and cycling routes. The Department supports the development of sustainable travel links between schools and residential areas.

The submission notes the SFRA Table 4 Justification Tests Lands associated with St. Joseph's CBS.

In terms of future capacity, the DoE has to be mindful of unforeseen circumstances such as the Ukrainian crises. The Department will engage with TCC where any assessment requires a review of school provision. It is also anticipated that additional special education needs provision will be required at primary and post-primary level with the possible need for increased accommodation. The Department welcomes the continued engagement with TCC.

Consideration:

- The growth figure applied by the Department is noted.
- The request to allow adequate land buffers around schools to accommodate potential growth has been provided for where possible.

- The request for a text change to reflect the changes to the criteria for determining students based on population figures and the student teach ratio is acknowledged and will be actioned.
- The points regarding the LTP and SFRA are welcomed.
- The point regarding engagement with TCC on potential reviews of school provisions is welcomed.

Recommendation:

- i. Amend footnote 14 in Section 5.4.1 to reflect change in class sizes (see Amendment 14 in Part 2)

Submission Number:

10

Submission Name:

Department of Defence (DoD)

Submission Summary:

- The Military Barracks is located in Summerhill and comprise 2.9 acres of land, including listed buildings. The site has historical and cultural significance. It includes three private dwellings.
- Development of zoning proposals on the lands will be required to have regard to the social and cultural history of the site
- The Department recently completed first registration of the property and the property is now vested in the Minister for Public Expenditure and Reform and administered by the Department of Defence.
- The Department now intends to dispose of the lands and the Department wishes to explore the possibility of transferring the lands to Tipperary County Council.

Consideration:

- The submission is noted.
- The Council has previously engaged with the Department of Defence on this issue of disposal of the Military Barracks, have acknowledged the offer to dispose of lands to TCC, and informed the Department that it does not wish to pursue the offer.
- The Council and the Planning Department will actively engage with new landowners for the site to deliver a high-quality development that accords with the requirements set out in 'Appendix 3: Regeneration Sites' of the LAP.

Recommendation:

No change to the Draft LAP is recommended.

Submission Number: 30	Submission Name: Electricity Supply Board (ESB)
<p>Submission Summary:</p> <p>ESB is a landowner and employer in Tipperary with property and infrastructural assets throughout the County serving Nenagh and its hinterland. We recognise that the Draft Plan incorporates a framework for guiding the future development of a climate resilient town. ESB Networks provides an essential service building and maintaining the electricity networks in Nenagh and throughout Co. Tipperary.</p> <p>The ESB Depot at Martyr’s Road, Nenagh is required to support the delivery by ESB of capital works programmes and operational activities in an energy efficient and cost-effective manner where key performance targets and emergency response times can be delivered. Good access to the main road networks and areas of potential growth is essential to provide an economic service and to meet emergency response times for Nenagh and its environs.</p> <p>ESB notes the proposed land-use zoning of <i>Regeneration Zone (RE)</i> for its lands at Martyr’s Rd, Nenagh. We further note the ambition of Tipperary Co. Co. to deliver a redeveloped urban quarter in the immediate area through the delivery of the Martyr’s Road Regeneration Plan. This quarter aims to deliver a vibrant Low Carbon Neighbourhood, with a Centre of Excellence for Sustainable Energy at its core. ESB is broadly supportive of the plan and understands that the development will take place over an extended period. Preliminary discussions have already taken place between Tipperary Co. Co. and ESB Representatives.</p> <p>There is a long-term requirement for an ESB Engineering Depot in the Nenagh area. The geographic location of this site is important to the core operations of the business. ESB will continue to explore opportunities offered by the proposed Regeneration Plan but will require to source a suitable alternative location, close to Nenagh to serve as a replacement Engineering Depot if this critical site is to be vacated. In such a scenario, ESB would incur significant site and relocation costs. As a commercial Semi-State, it would be essential for ESB to recover all costs associated with any relocation.</p> <p>We support the ambition of the Draft Plan to deliver an overarching land use strategy for the proper planning and sustainable development of Nenagh.</p>	
Consideration:	

Then submission is noted and the overall and general support for the ambition of the Plan is welcomed. The openness of ESB to engage with the process of considering decanting from the site on Martyr's Road to facilitate regeneration of this area is also welcomed. The requirement for alternative facilities in the area is noted. The provision of critical infrastructure, such as that provided by the ESB would be supported on a number of land use zonings within the LAP, and equally, the Council's planning section would be open and willing to engage in dialogue for the provision of alternative sites, if alternative sites were identified.

Recommendation:

No changes to the Draft LAP recommended.

Submission Number:

15

Submission Name:

An Post

Submission Summary:

An Post own and operate a retail and mail centre at Ashe Street, Nenagh, and provide an essential public service. The submission requests that Tipperary County Council provide a supportive policy framework for the future provision of postal infrastructure.

Town Centre First

An Post is supportive of the Nenagh Town Centre First Plan and Objective 3A.

Local Transport Plan

An Post is supportive of the LTP for the Town in line with Policy 6.2 of the Draft LAP:

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

Deliveries and Access

The submission outlines the importance of maintaining a sufficient level of vehicular access and loading bay space to accommodate the collection and delivery of mail and to accommodate customers who require use of a vehicle to visit an An Post facility. An Post request engagement with TCC during the preparation of any future public realm and movement strategies to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centre areas for the public.

Zoning

Request that Tipperary County Council include provisions for An Post postal facilities (An Post Customer and An Post e-Commerce) as 'Permissible in Principle' or 'Open for Consideration' land uses across all zoning objectives in the Nenagh Local Area Plan 2024-2030.

Request that Tipperary County Council include a specific land use classification for postal facilities in the new Local Area Plan as outlined below:

- Postal Facilities: A building which facilitates mail services that can include the processing, sortation and distribution of mail.

It is also requested that a 'Postal Facilities' land use is considered as 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives in the Local Area Plans for the Town.

Supportive Policies

Policies, such as the below would assist greatly in the delivery of future An Post projects in the Town:

- "To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the Town."
- "To facilitate the provision of postal infrastructure at suitable locations in the Town."
- "To promote the integration of appropriate postal facilities, including both post offices and processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement."

Car Parking

Requested that Tipperary County Council provide flexibility with car parking standards for postal facilities.

Engagement with An Post

Request that the Local Authority carefully consider the operational requirements of An Post at all stages of the development process for any public realm works and that full collaboration and discussions are held with An Post prior to and during any such works.

Consideration:

Town Centre First

This is noted and welcomed.

Local Transport Plan

This is noted and welcomed.

Deliveries and Access

The points made in the submission around access to An Post facilities are acknowledged. Consultation with key stakeholders is a critical part in the development of projects and TCC will continue to consult with all stakeholders in the progression of projects which may impact on their properties/facilities.

Zoning

The purpose of land-use zoning within the LAP is ensure a range and mix of uses could be provided within particular areas, rather than designated a specific use, as this could lead to dereliction through the inflexibility of the Plan, if uses where to vacate. Similarly, and for the same reasons, the land use matrix does not specify businesses but provides for a wide range of uses within land use zoning types, to encourage a mix of uses and vibrancy. In any event, the LAP makes provision for significant areas of land where the proposed uses could be accommodated within the local area plan. The planning authority are also available to advise if specific locations are identified for development.

Supportive Policies

These are noted. However, to include policies relating to specific business uses would render the plan unwieldy. Nonetheless, postal facilities provide an important social function, and it is recommended that Policy 5.6 of the Plan is amended to make reference to postal facilities.

Car Parking

Car parking standards are set out in the County Development Plan for various different uses and it is not intended to amend car parking standards in the LAP, to ensure consistency throughout the county. In any event, where alternative parking standards are required / demonstrated / considered appropriate, this can be discussed with the Council.

Engagement with An Post

Consultation with key stakeholders is a critical part in the development of projects and TCC will continue to consult with all stakeholders in the progression of projects which may impact on their properties/facilities.

Recommendation:

- i. Amend Policy 5.6 of the Draft LAP to make reference to postal facilities (see Amendment 18 in Part 2)

2.2 Local Bodies

Submission Number:

17

Submission Name:

Nenagh Lawn Tennis Club

Submission Summary:

- The submission highlights the importance of the Nenagh Lawn Tennis Club to a large membership catering for children and adults, from Nenagh and the hinterland. The club has grown in recent years and has undertaken many improvements. The club currently finds it is at capacity in terms of facilities and is now restricted in providing additional facilities to its members.
- In this regard the club notes the change of zoning of the adjoining lands to the north from Amenity to Strategic Reserve in the draft local area plan. The submission requests that a portion of the land adjacent to Nenagh Lawn Tennis Club, towards Coille Bheithe, remain zoned as amenity as illustrated in an attached diagram.



Consider area outlined in red to be retained as amenity.

Consideration:

- Nenagh Lawn Tennis Club is well-known locally as an important sporting amenity in the town, which contributes to the social fabric of the town. As noted in the submission, the club has an extensive and growing membership and it is considered appropriate that amenity / open space and recreation lands are available for the club to expand. It is therefore considered appropriate that further lands to the rear of the club are zoned 'Open Space and Recreation'.

- Nonetheless, and as noted in the response to the OPR submission, it is recommended that the adjacent lands are zoned 'New Residential'. To ensure a cohesive development of these adjacent lands, it is considered that the scale of land use zoning indicated in the submission is excessive for the needs of the club, whilst allowing the appropriate development of the adjacent lands.
- Accordingly, a change should be accommodated, though not to the scale identified in the submission.

Recommendation:

- i. Amend the zoning of land from 'Strategic Reserve' to 'Open Space and Recreation' – Submission 32 from OPR and Submission 33 from Tom D'arcy (see Amendment 57 in Part 2)

2.3 Zoning Related Submissions

Submission Number: 5	Submission Name: Dr. Mary Ryan
Submission Summary:	
<ul style="list-style-type: none"> • The submission relates to land at Riverston and requests that the land is designated as Strategic Reserve. • Submission states that the land is currently in use as a working organic farm and suggests that development at this area is premature and makes a number of points to support this, including traffic concerns, natural habitats and mature trees, and potential negative impact on Riverston House. 	
Consideration:	
<ul style="list-style-type: none"> • The lands to which the submission relate are serviceable, located in close proximity the urban core, a number of services and amenities within Nenagh town, and the development of these lands would represent sequential and contiguous development. The current land use for agriculture would not preclude the development of the lands. Though Riverston House is listed on the Record of Protected Structures, this would not preclude the redevelopment of adjacent lands in a manner sensitive to this structure. • In terms of access arrangements, the site is serviceable in principle. All future development access proposals will need to meet necessary safety standards set out in TII's Design Manual for Roads and Bridges (DMRB), Design Manual for Urban Roads and Streets (DMURS) and other appropriate design guidance. Any development at the proposed site will need to go through its own planning process to gain permission, at which point the access/egress arrangements for the site will be assessed in detail. • The Draft Plan has been subject to environmental assessments and contains measures that will ensure the appropriate consideration and mitigation of environmental impacts at project level, including those relating to biodiversity, flora and fauna, landscape and cultural heritage. 	
Recommendation:	
No change to the Draft LAP recommended.	

Submission Number: 18-21	Submission Name: Lisbunny Developments Limited
Submission Summary:	

Submission requests that the zoning on the Draft Plan be amended to reflect the planning history and masterplan proposals of the lands at Tyone as follows:

- A section of “New Residential” lands in the Draft LAP to be zoned “Community, Services and Infrastructure”;
- A small section of “Town Environs” in the Draft LAP to be zoned “New Residential”;
- A section of land zoned “Community Services and Infrastructure” in the Draft LAP to be zoned “New Residential” and “Urban Core”;
- The lands zoned “Strategic Reserve” in the Draft LAP to be zoned “New Residential”

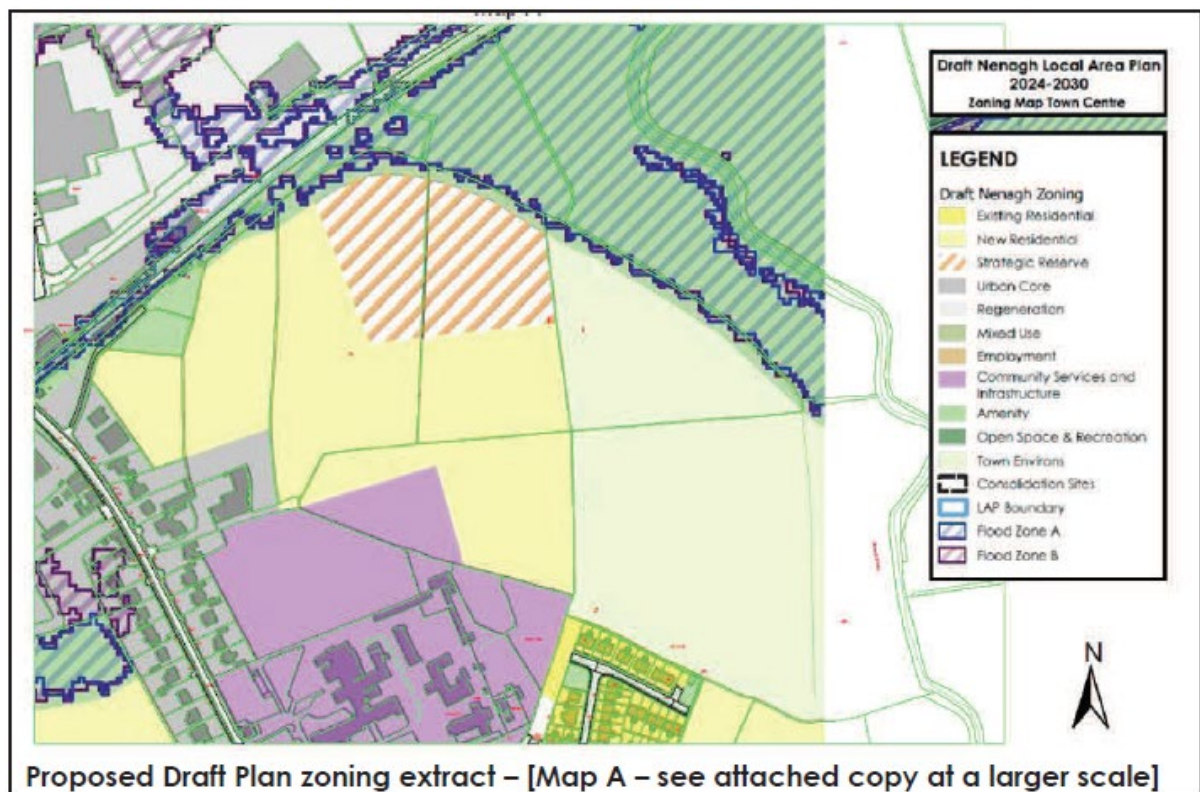


Figure 1: Zoning as per Draft LAP

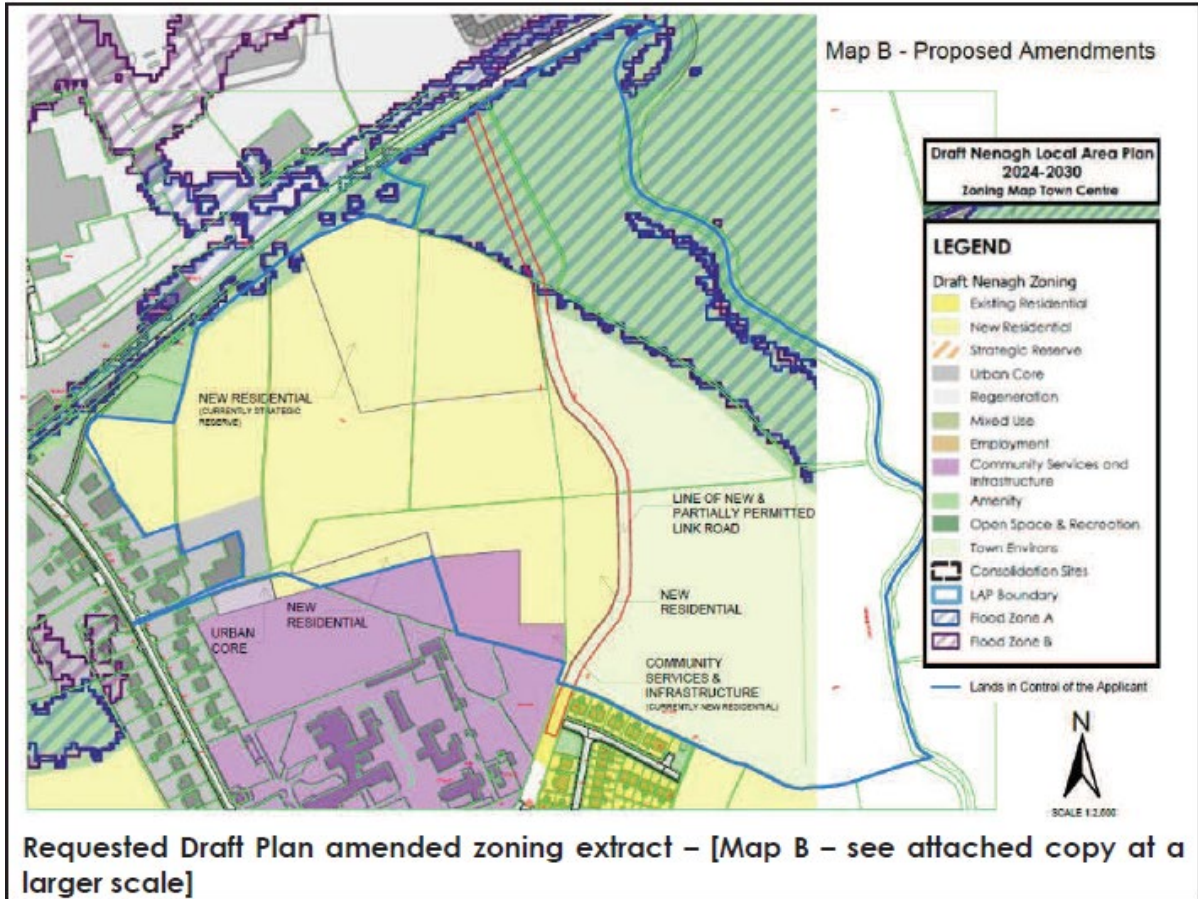


Figure 2: Zoning as per request

The proposed request seeks to align the land use zoning with planning permissions which have been granted on the lands, and the masterplan for the development of further areas of the land ownership. Lisbunny Developments Limited is the contracted owner of the lands.

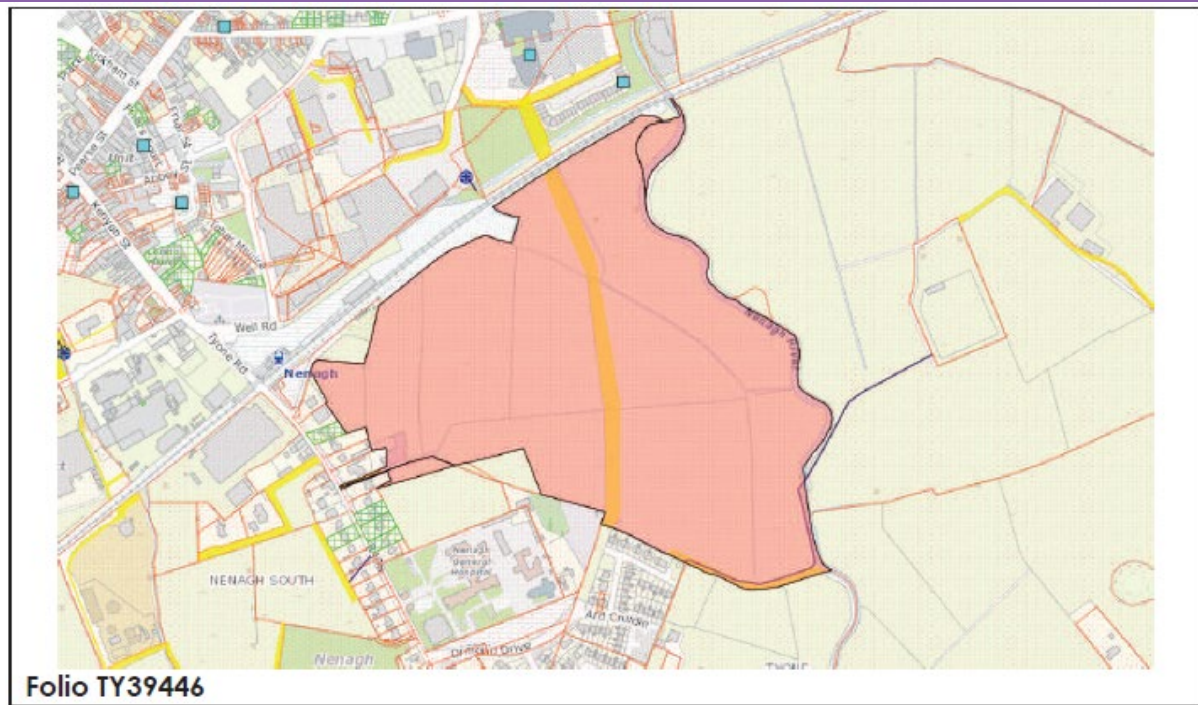


Figure 3: Land Holding of Lisbunny Developments Limited

By amending the land zoning in this way, the developments which have received permission could be completed in the event they are not completed within the lifetime of the planning permissions, as the amended zonings would enable the extension of duration of planning permissions if required.

Consideration:

The submission advances reasonable arguments for amending the zoning of the lands, namely that planning permission has been achieved on the lands, and the amended land use zonings would permit the landowner to deliver the planning permissions, if they are completed within the lifetime of the permissions. The presence of 'live' permissions' should not determine future land uses. Nonetheless, it is reasonable that the land use zonings of planning permissions secured on the lands would reflect those planning permissions, and it recommended to amend the zonings in some of the cases outlined in the submission request.

However, planning permission has been secured for 159 residential units (plus other development) in the last 2-3 years. These developments have yet to commence, but if they are commenced and delivered within the lifetime of the Plan, they will contribute a significant portion of the required housing for the town. To ensure a balanced geographical development of the town over the course of the Plan, and given the likely challenges of delivering the remaining areas of the masterplan over the course of the Plan, it is considered that the remaining land areas would be zoned 'Strategic Reserve'. This land use zoning designation is considered most appropriate in

recognition of the fact the lands are well located, adjacent to the rail station and within walking distance of the town centre and a number of health amenities and could be developed over the lifetime of the next LAP.

Recommendation:

- i. Amend the Land Uses Zoning Map as follows (see Amendment 61 in Part 2):
 - Part of the “New Residential” lands in the Draft LAP be zoned “Community Services and Infrastructure”;
 - Part of the “New Residential” lands in the Draft LAP be zoned “Strategic Reserve”
 - Part of the “Town Environs” in the Draft LAP be zoned “New Residential” and “Strategic Reserve”;
 - Parts of the “Community Services and Infrastructure” in the Draft LAP be zoned “New Residential” and “Urban Core”;

Submission Number: 22	Submission Name: Chris Lind
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Submission Summary:

Submission requests that Draft Nenagh LAP is amended to include:

- Zoning of 5.8 hectares of land for business & employment use; and
- Zoning of 5.81 hectares of land for Strategic Reserve purposes.

The submission is made by HRA Planning on behalf of the landowner, Christopher Lind, who has a land holding of 43.3ha located northwest of the town centre. The land currently benefits from a mix of land use zonings in the current Nenagh Town & Environs Development Plan 2013 – 2019, including 5.8 hectares of business & employment use and 5.3 hectares of Serviced Sites P2 land.

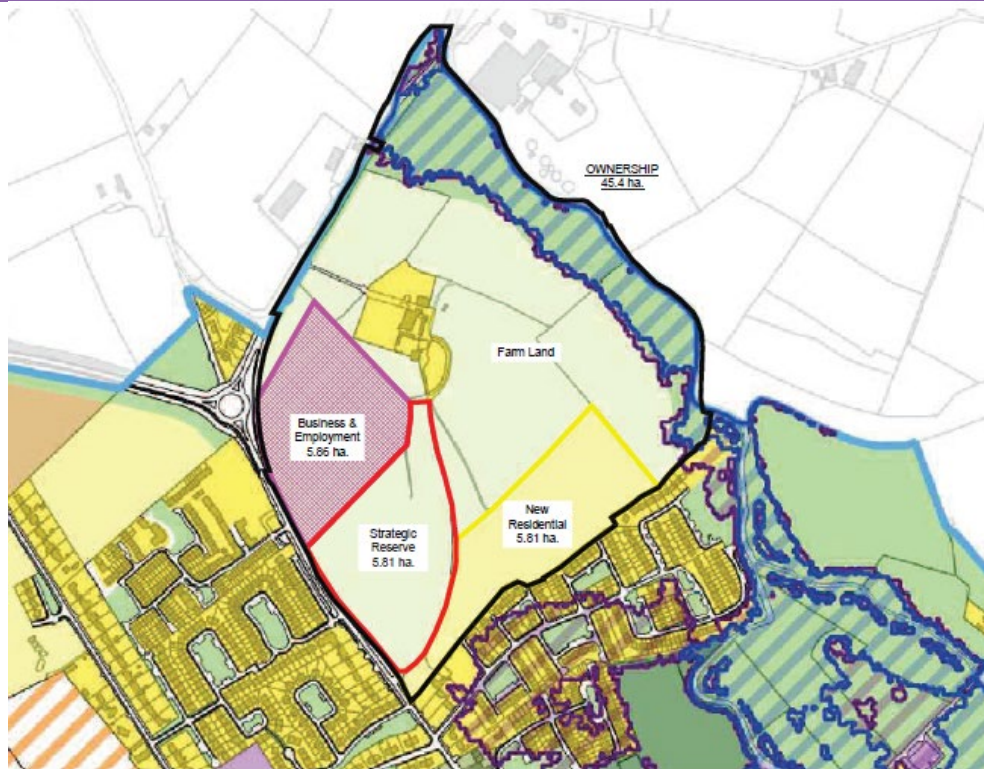


Figure 4: Zoning request which relates to the red outlined area and the purple outlined and hatched area

Purpose of Submission

A pre-draft submission was made on the LAP seeking mixed use zoning on the entirety of the subject site. It was highlighted that the land is adjacent to AIBP Food Group which employs 140 people. The mixed-use zoning was sought subject to:

- The development of a phased masterplan;
- Maintaining a green buffer along the N52;
- provision of community facilities, including open space;
- A mix of uses;
- Maintenance of open space / amenity zoning along the Nenagh River

This submission demonstrates that an alternative access off the R497 can be secured to service the land and that the site is not dependent on access onto the N52, thereby supporting continuation of business & employment use at this location.

Access

A Traffic Report has been prepared by Traffic Transport and Road Safety Associates Ltd. (TTRSA) demonstrating how safe access can be provided off the R497 Borrisokane Road. Access is proposed from a 4-arm roundabout junction at the south-western corner of the existing business

& employment use lands. The roundabout also provides access to the Drummin Village estate, replacing the existing T-Junction at this location.

TTRSA confirmed that development on that area of land zoned for business & employment use is also not likely to indirectly impact the N52 or the roundabout junction to the north, with development of large format low employment intensity use operators. Thus, contrary to the assumptions made in the Strategic Land Assessment for Employment Uses as detailed in Appendix 1 of the Draft Plan, the subject site is capable of being accessed off the R497, thereby preserving the N52 route. Accordingly, contrary to the opinion of the planning authority the proposed development would not be contrary to the Spatial Planning and National Roads Guidelines.

The subject land can therefore be considered in the same vein as the business & employment zoned land to the north of Gortlandroe, also adjoining the N52. Having regard to the location of subject lands, in closer proximity to the town core than the land zoned for business & employment use in Gortlandroe, there is justifiable reason for zoning the subject land on compact and sequential growth reasons, particularly having regard to its spatial location in proximity to existing employment nodes (AIBP Food Group) and neighbouring residential uses.

Strategic Reserve Land

The subject land offers 426m of road frontage onto the R497 and is located within 470m walking distance of town centre zoned land. As confirmed in the Strategic Land Assessment for Residential Uses, the subject land benefits from roads, footpaths, water, public lighting and foul sewerage. In contrast a site identified as 'Site 3' in the Strategic Land Assessment for Residential Uses, situated a similar distance from the subject land, but yet not benefitting from any infrastructure, has been zoned for Strategic Reserve purposes. Similarly, land identified as 'Site 5', situated a further distance from the town centre than the subject site, has been zoned for residential use.

Traffic Report

A detailed Traffic Report is appended to the submission, which outlines how access to the subject could be achieved successfully. It includes a Non-Technical Summary as follows:

- Approximately 5.85 hectares of Mr. Lind's lands are currently zoned for business and employment use within the Nenagh Town and Environs Development Plan 2013-2019 (as extended).
- As a new development access is unlikely to be granted onto the N52 where the default national speed limit applies, any access to the zoned lands would need to be from the R497 Borrisokane Road. Mr. Lind proposes access from a 4-arm roundabout junction at

the south-western corner of the zoned lands, the roundabout also providing access to the Drummin Village estate, replacing the existing T-Junction at this location.

- HRA planning, Mr Lind's planning consultant, has informed TTRSA that the proposed development is likely to comprise warehousing and logistics. TTRSA undertook a video-based manual classified traffic count survey at the existing R497/Drummin Village estate junction, on Tuesday 10th May 2022.
- Existing traffic on the R497 Borrisokane Road, has been modelled to grow to an opening year (for the proposed development of Mr. Lind's zoned lands) of 2029, and a future assessment year 2044 (fifteen years after opening) using TII Project Appraisal Guidelines central link-based growth factors for County Tipperary.
- Peak hour trip generation for the Mr. Lind's zoned lands has been estimated based on trip generation traffic count surveys (previously undertaken by TTRSA), covering range of business and employment uses including; distribution; manufacturing; offices; storage and distribution; and, wholesaling. The estimated trip generation has been based on a gross floor area (GFA) of 29,250m², which would represent 50% of the zoned area, and would be typical for the type of development being considered.
- The assessment contained within this Traffic Report also takes account of the committed and planned developments within the Drummin Village estate covered by planning references 21/1348 and 23/60551, including the masterplan for subsequent development associated with the latter application.
- As a basis for assessment of the geometric requirements and capacity of a 4-arm roundabout junction on the R497 Borrisokane Road (to provide access to Mr. Lind's zoned lands and the Drummin Village estate) TTRSA prepared a geometric layout complying with TL703 (Segregated Roundabout with Shared Active Travel Facilities) within the Cycle Design Manual (CDM) with a 30m inscribed circle diameter (ICD).
- The operation of the 4-arm roundabout junction was assessed using TRL Junctions (ARCADY) traffic modelling software for the weekday AM and PM peak hours in the opening and future assessment years, with trips from committed development, planned development and development of the zoned lands.
- The traffic modelling results show that a roundabout with predicted trips from committed development, planned development and development of the zoned lands to operate with 41% spare capacity in 2044 AM peak hour, and 36% spare capacity in the 2044 PM peak hour. The queuing associated with the junction is also predicted to be minimal.
- The development of Mr Lind's zoned lands for warehousing and logistics with associated offices is predicted to generate 403 daily traffic movements (in PCUs) at the N52/R497

roundabout, an increase of approximately 4%, thereby under the 5% threshold value normally considered to represent a material intensification.

Consideration:

The submission sets out detailed arguments why the lands should be zoned for employment use, relating to the proximity of the lands to the town centre, the serviceability of the lands with particular reference to access arrangements to the lands and makes reference to other employment lands within the Draft LAP.

Purpose of Submission

Noted.

Access

Detailed consideration has been given to the proposed access arrangements to the land, and with supporting information from the Traffic Report, the submission sets out that the proposed solutions would not have undue impacts on the surrounding transport network. Nonetheless, the proximity of the proposed development to the national road and junction in this instance differs from the other land use zonings. As acknowledged by the Traffic Report, the development would result in an increase in the quantum of traffic at the national road junction, the N52 Borrisokane roundabout, with potential adverse effects on the capacity and efficiency of the road junction.

The proposals for employment use would introduce an intensive use at this location, in contrast to, and potentially competing with, other established strategic employment locations in the town. In so doing, the proposed employment land use zoning at this location may compromise the consolidation of employment land use and the viability of established strategic employment locations in the town.

Strategic Reserve Land

Reference to 'Strategic Reserve' lands are noted. However, Site 3 would be easily serviced, in the lifetime of the next plan, if Sites 2 & 4 were developed over the course of this Plan. Significant parts of Site 5 referenced benefit from planning permission and it is therefore reasonable that this site is zoned for residential use.

Traffic Report

Consideration outlined under 'Access' section above.

Recommendation:

- i. Amend the land use zoning of lands from 'Existing Residential' to 'Town Environs' – See Submission 32 from the OPR (see Amendment 63 in Part 2)

Submission Number:

33

Submission Name:

Tom D'Arcy

Submission Summary:

Submission requests that lands zoned 'Strategic Reserve' in the Draft LAP are zoned 'New Residential'. The submission is made by HRA Planning on behalf of the landowner.



Figure 5: Lands to which the submission relates

- The zoning of the subject lands for Strategic Reserve in the draft plan has no logic or justification given its central position within the town.
- It is the intent of the landowner to make the subject land available for residential development during the lifetime of the new Nenagh Local Area Plan.
- The zoning of the subject land for Strategic Reserve is at variance to the residential development strategy set out in the Draft Nenagh Local Area Plan and Policy 5.2 of the Draft Plan.
- The subject lands represent a significant underused plot of land positioned centrally, and in close proximity to the town centre, services and employment, and that the residential use of it, would facilitate compact growth through provision of new residential development

centrally within the town, which would contribute toward the development of 'town centre neighbourhoods' as advocated in the Draft Nenagh LAP.

- Contrary to the Service Land Assessment (SLA) set out in the draft Plan, there are no fundamental infrastructure restrictions to the development of this land for residential use. The enclosed access report demonstrated access options in the context of the capacity of other roads and junctions to accommodate the residential use of the subject lands.
- The access options identified and assessed to support the residential zoning of the subject lands are the same access options that have been deemed acceptable by the Council in its zoning of adjacent lands for residential use.
- The residential use of these lands during the lifetime of the Local Area Plan would: be consistent with; National Planning Framework, National Planning Guidelines in relation to residential density, the Regional Spatial and Economic Strategy, and the Tipperary County Development Plan 2022-2028 which direct and dictate that the LAP development framework should seek to achieve inter-alia; compact urban development and settlement growth for Nenagh, increased land supply for housing within the town for circa 664 homes, through infill development of underused land in order to reduce transport and emissions and contribute to the 10-minute concept of proximity to services.
- For these material planning considerations, it is respectfully requested that the subject lands are zoned for 'Residential' use in the finalisation of the Nenagh Local Area Plan.

An Access Report from Coakley Consulting Engineers is appended to the submission. It sets out three options for accessing the lands: (1) via Coille Bheithe; (2) via Castle Oak Crescent; and (3) via Nenagh tyre Centre Lands. The submission indicates that access option 3 has been agreed in principle with the Tyre Centre landowner. The report indicates that all three options are potentially viable options that would not unduly impact on the transport network.

Consideration:

The subject lands are well located within the town, though there are significant concerns in relation to access options 1 and 2 outlined in the Access Report, as these options may not be deliverable with the lifetime of the Plan or would not be feasible options. Option 3, however, may provide a reasonable access solution and it is noted that this option has been agreed in the principle with the relevant landowner.

It is accepted that the lands are well located and could deliver a number of the sustainable planning objectives for the LAP, including providing pedestrian and cycle permeability links between the Coille Bheithe estate and the Limerick Road. As such it is recommended that that the land use zoning of the lands is amended from 'Strategic Reserve' to 'New Residential'. As noted in the

response to submission 17 (Nenagh Lawn Tennis Club), it is recommended that a small portion of the lands are zoned 'Open Space and Recreation'.

If the lands are to be developed, it is important that sporting amenities, such as the adjacent tennis club do not in future come under pressure from future residents of the lands about concerns relating to noise and floodlight spill from the tennis club. Given these amenities, and other similar such amenities in town, are important social, health and cultural contributors to the town, the onus on protecting the general peace and quiet of the home should fall of the developer of any such locations. To this end, it is recommended that an additional policy is included within the LAP to reflect the need for developers to design new development to take account of issues such as noise existing generating uses, existing floodlights (and potential locations for such infrastructure), overlooking etc.

Recommendation:

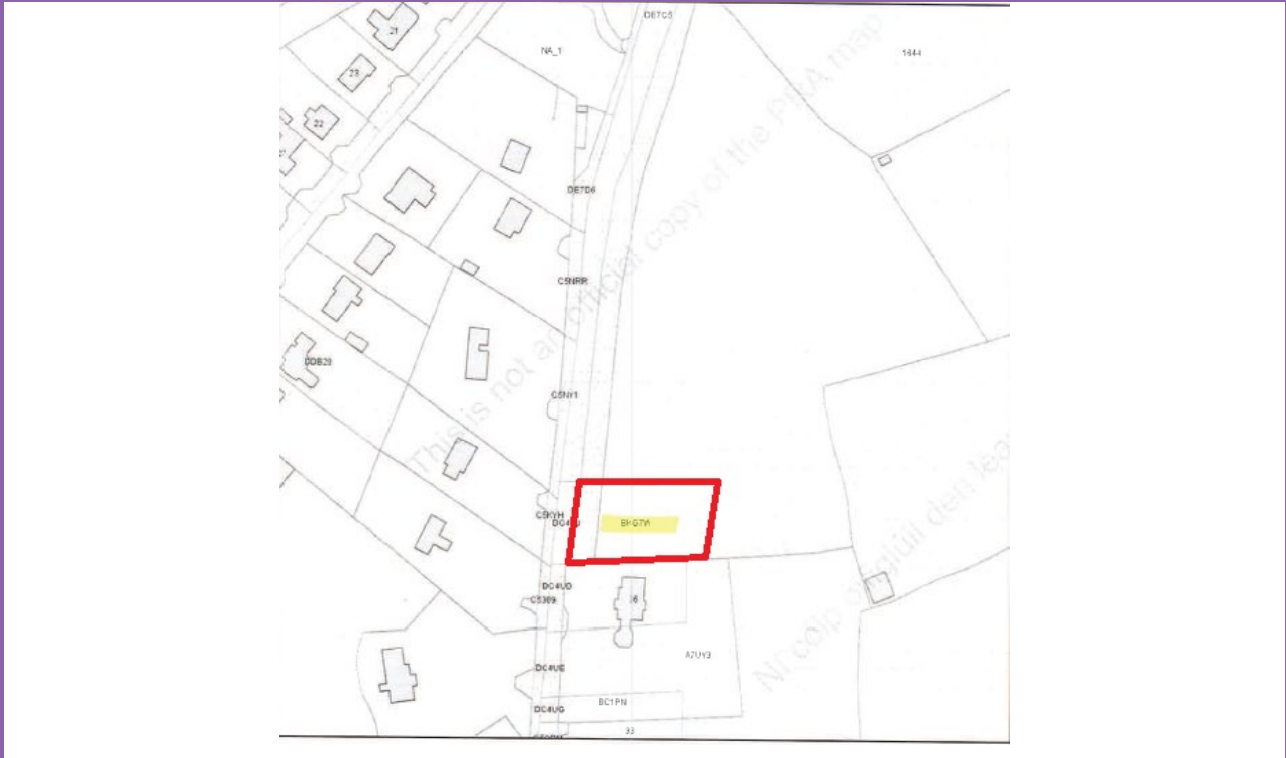
- i. Amend the Land Use Zoning Map as follows:
 - 'Strategic Reserve' to 'New Residential' (see Amendment 57 in Part 2)
 - 'Strategic Reserve' to 'Open Space and Recreation' (see Amendment 57 in Part 2)
- ii. Add text to section 5.3 'Open Space and Amenities' to reflect need to place onus on developers to design new housing to take account of existing amenities see Amendment 13 in Part 2)
- iii. Add policy to section 5.8 'Policy and Objectives' to reflect need to place onus on developers to design new housing to take account of existing amenities (see Amendment 19 in Part 2)
- iv. Amend Table 1 in the SLA insofar as it relates to Site 39 (See Amendment 48 in Part 2)

Submission Number: 36	Submission Name: Andrew Mackey
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Submission Summary:

- The submission relates to undeveloped land at Benedine, Nenagh, indicated by the map below and requests that the site maintains its current zoning status² in order to support the construction of a dwelling house.
- The submission notes that the site is located in a 80km/hr traffic speed zone which will reduce further and notes the availability of good public services at the location.

² The lands are currently zoned 'Serviced Sites P1'



Consideration:

- The submission is noted. However, the lands to which the submission relates are unserviced, as waste water services are not available to lands to the south of the railway line. There are no immediate plans to provide connections to the municipal waste water treatment system within the lifetime of the Plan and therefore the lands are not considered to be ‘serviceable’ within the definition set out in the NPF and the Development Plan guidelines.
- It should be noted that Policy 5.3 of the Draft Plan is recommended to be amended (See Amendment 16 in Part 2). The proposed amendment may address the stated need to develop a house at the site.

Recommendation:

- Amend the land use zoning of lands from ‘Existing Residential’ to ‘Town Environs’ – See Submission 32 from the OPR (see Amendment 58 in Part 2)

<p>Submission Number: 37</p>	<p>Submission Name: Thomas Harty & Pauline Harty</p>
<p>Submission Summary:</p> <ul style="list-style-type: none"> • The submission relates to undeveloped land at Benedine, Nenagh as illustrated in the map provided and requests that the land remains zoned as in the previous local area plan³ in 	

³ Lands referenced are currently zoned a mix of ‘Existing Residential’, ‘New Residential Low Density P1’ and ‘Serviced Sites P2’

order to support the construction of a dwelling house for a family member based on social need.

- It is noted that good services are available at the location and the site is within a 60km per hour speed limit zone.
- A copy of a previous submission on the Draft County development Plan 2006 is enclosed.

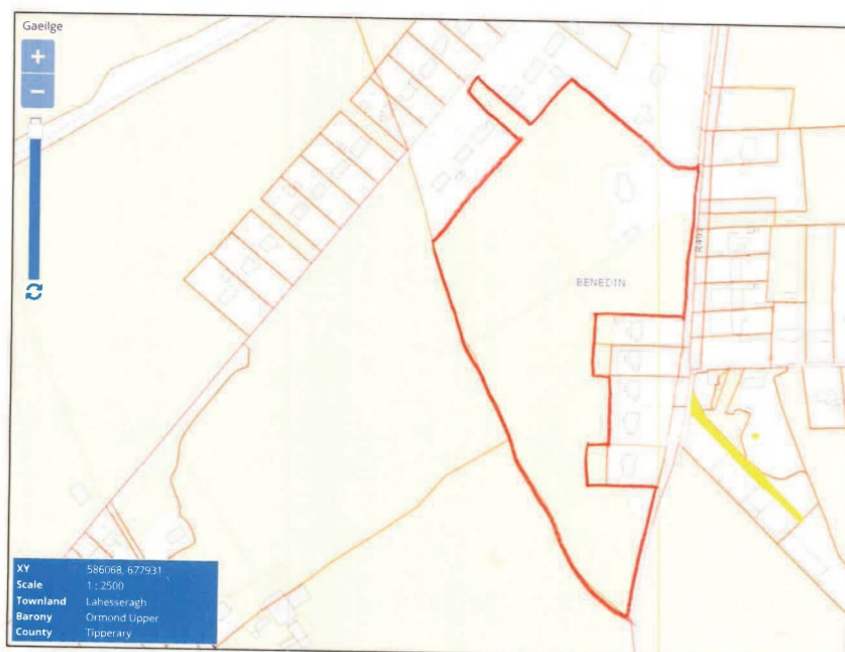


Figure 6: Map included with submission

Consideration:

- The submission is noted. However, the lands to which the submission relates are unserviced, as waste water services are not available to lands to the south of the railway line. There are no immediate plans to provide connections to the municipal waste water treatment system within the lifetime of the Plan and therefore the lands are not considered to be 'serviceable' within the definition set out in the NPF and the Development Plan guidelines.
- The submission of the OPR should be noted with respect the lands zoned 'Existing Residential' in the Draft Lap and recommended Amendment 58 set out in Part 2 to amend the zoning of these lands to 'Town Environs'.
- It should also be noted that Policy 5.3 of the Draft Plan is recommended to be amended (See Amendment 16 in Part 2). The proposed amendment may address the stated need in the proposal for the son of the landowner to develop a house at the site.

Recommendation:

- i. Amend the land use zoning of lands from 'Existing Residential' to 'Town Environs' – See Submission 32 from the OPR (see Amendment 58 in Part 2)

Submission Number:

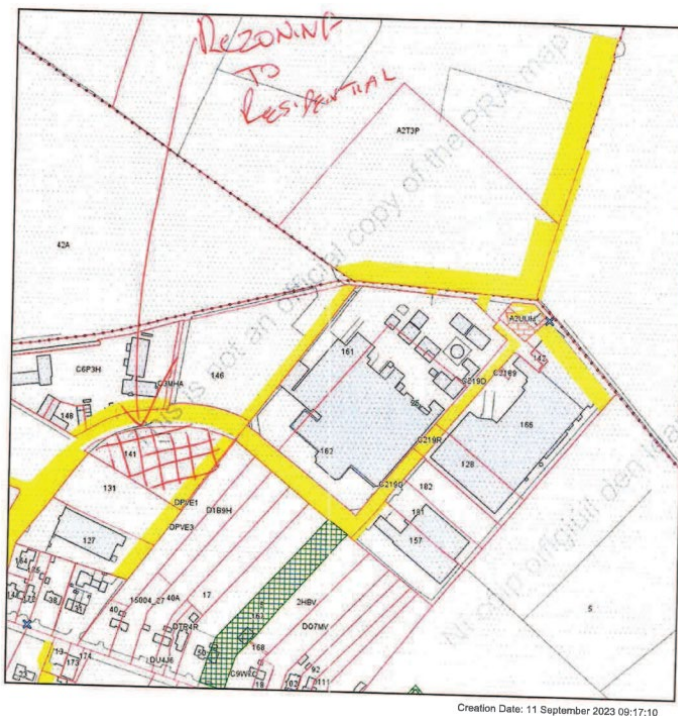
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Submission Name:

Allied Metals Recycling

Submission Summary:

- This submission is in relation to land at Gortlandroe Industrial Estate, Nenagh and requests a change of zoning to residential zoning.
- The submission notes that the land is currently an unused car park that is adjacent to land zoned residential and this land could be used for housing.



Consideration:

Though the lands referred to are 'serviceable', the site is located within the Gortlandroe Industrial Estate. The estate is identified as a Strategic Employment location within the Draft LAP, in light of the employment opportunities currently available and in the future. The proposed development of residential uses in proximity to employment uses, some of which may have significant levels of general noise and disturbance associated with them, would create a conflict of uses. The residential use of these lands, as well as negating the potential use of the lands themselves for employment use, would also be likely to prejudice the use and growth of adjacent employment lands, in light of the conflict of uses. It is therefore recommended that the land remained zoned for 'Employment' as per the Draft LAP.

It should be noted that part of the lands referred to are within a flood zone.

Recommendation:

No change to the Draft LAP recommended.

2.4 Individual Submissions

Submission Number: 2	Submission Name: Emer O'Neill
<p>Submission Summary:</p> <ul style="list-style-type: none"> • Poor provision of public transport from Nenagh to Dublin, Limerick and Thurles; • Lack of connectivity between bus and rail services to support public travel; • Limited bus service to Thurles and the lack of a shuttle service from Nenagh train station to any other train station; • Action should be taken to improve public transport connection to Nenagh in light of the current climate with rising car costs. 	
<p>Consideration:</p> <p>In relation to the existing public transport provision, the LTP includes details of the National Transport Authority's Connecting Ireland Rural Mobility Plan which aims to increase transport connectivity for people living in Rural Ireland. The plan aims to improve mobility in rural areas, and it will do this by providing better connections between villages and towns by linking these areas with an enhanced regional network connecting cities and regional centres nationwide.</p>	
<p>Recommendation:</p> <p>No change to the Draft LAP recommended.</p>	

Submission Number: 3	Submission Name: Emer O'Neill
<p>Submission Summary:</p> <ul style="list-style-type: none"> • Requests a designated taxi rank and taxi service for Nenagh, noting the current lack of a taxi rank or publicly advertised taxi service in the town. Banba Square could be a suitable location to situate a taxi rank. • Taxi service in Nenagh should be affordable and support travel by people on pensions. 	
<p>Consideration:</p> <p>The National Transport Authority is the body responsible for issuing Taxi/Small Public Service Vehicles (SPSV) and the Local Authority in consultation with An Garda Siochana are responsible for planning the location and design of taxi ranks.</p> <p>The delivery of the transport hub for Nenagh Town is a key recommendation of the LTP, which would include the provision of space for Taxi and hackney services. As the demand for such</p>	

services is established, additional locations could be designated for these services. Tipperary County Council would welcome such services for the Town.

Recommendation:

No change to the Draft LAP recommended.

Submission Number:

4

Submission Name:

Gearoid Fitzgibbon (SEAI Tipperary County Sustainable Energy Community Mentor)

Submission Summary:

- The submission concerns energy planning, energy efficiency and renewables. The submission is concerned with the lack of specific measurable indicators and vague language which results in a plan without aims, ambitions or commitments.

Specific comments:

- Objective 2A, requests that the local authority outline in a specific measurable what is its role in helping communities implement the actions of the Tipperary Climate Action Plan.
- Objective 2G, local authority should set targets and develop its own energy initiatives.
- 8.1 Energy Demand and Renewable Energy and Policy 8.1, the objective should include specifics and measurable indicators.
- 5.1 Nenagh Low-Carbon and Sustainable Energy Community and Objective 5A. The submission requests that the Local Area Plan clarifies what support the local authority will provide to local communities. The submission comments that it would be appropriate in this paragraph to mention the SEAI Sustainable Energy Communities mentor and include a weblink.

The submission notes the following:

- Welcome for Policy 2.3 and queries whether 'The Climate Action Fund', which is listed as supporting capacity building, actually achieves this.

Consideration:

The submission, in general terms, requests further detail or specific on measures that are included within the Draft LAP. It reasonable that specific or measurable actions are outlined. However, the Draft LAP is fundamentally a spatial land-use plan and it is beyond the scope of the LAP to provide or commit to specific objectives, as this is the role of other local authority plans, including the Local Authority Climate Action Plan. The role of the LAP is to provide strategic direction for future

development and provide policy support for this strategic direction in the assessment of new development proposals.

With regard to the SEAI Sustainable Energy Communities mentor, it is considered that the LAP, a strategic and spatial land use plan for a 6-year period, would be the incorrect forum for the inclusion of this measure.

The Climate Action Fund (CAF) was established to provide assistance and financial support to projects which will help Ireland achieve its climate and energy targets. The reference included in the Draft LAP is therefore considered appropriate.

Recommendation:

No change to the Draft LAP recommended.

Submission Number: 6	Submission Name: Thomas & Pauline Harty
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Submission Summary:

- The submission concerns a derelict structure located off Ball Alley Lane at Kenyon Street Car Park;
- Submission commends the local authority on works undertaken to enhance and regenerate the lanes of Nenagh Town and notes the positive developments in the area of Kenyon Street Car Park;
- Remaining derelict structures detract from this key location and the submission states that the landowner will work with the planning authority to address the dereliction.

Consideration:

The structure referred to is located on lands zoned 'Urban Core' which permits, in principle, a wide range of uses for the site. The Planning Authority would support and encourage the sensitive and sustainable redevelopment of the lands, consistent with the objectives of the land use zoning, where development proposals to be brought forward.

Recommendation:

No changes to the Draft LAP recommended.

Submission Number: 7	Submission Name: Siobhan Cuddy
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Submission Summary:

- Supports the proposal to close the archway linking Kenyon Street and Abbey Street to traffic and to make this a pedestrian walkway;
- Notes that at present this lane is used as a short cut and the speed of cars travelling on Abbey Street is a safety concern.

Consideration:

The submission is noted and welcomed. The proposals to close the archway linking Kenyon Street and Abbey Street to improve active travel modes in this location is included as an objective of the LTP (see Active Travel Intervention 39 in the LTP).

Recommendation:

No changes to the Draft LAP recommended.

Submission Number:

13

Submission Name:

Siobhan Cuddy

Submission Summary:

- Supports the work of the local authority in active travel schemes and the town circulation scheme;
- Requests the improvement of the built environment in Nenagh to adapt and mitigate climate change and to benefit health and wellbeing;
- Supports the proposal to pedestrianise the archway from Kenyon Street to Abbey Street.

Consideration:

- The points are noted and welcomed.

Recommendation:

No changes to the Draft LAP recommended.

Submission Number:

8

Submission Name:

Angela Ryan

Submission Summary:

- Submission raises concerns regarding traffic congestion and double parking on William Street and suggests the way to address this is to restrict parking to only one side of the street and repaint the centre line.

Consideration:

The points raised in this submission are noted. The LTP includes proposals for traffic calming measures on William Street and improving footpaths.

Recommendation:

No changes to the Draft LAP recommended.

Submission Number: 9	Submission Name: Angela Ryan
Submission Summary:	
<ul style="list-style-type: none"> The submission comments that the road on the Nenagh side of Kilmore graveyard is too narrow and should be widened. 	
Consideration:	
<ul style="list-style-type: none"> The location of Kilmore graveyard does not come within the Draft LAP boundary and objectives to address the concern cannot therefore be included in the Draft LAP. 	
Recommendation:	
No change to the Draft LAP recommended.	

Submission Number: 12	Submission Name: Shane Egan (Tipperary Energy Agency)
Submission Summary:	
<p>The submission commends the local authority on a well thought out draft local area plan for Nenagh and suggests the use of special symbols to highlight energy and climate action related objectives and policies that have derived from engagement with Tipperary Energy Agency (TEA). It is also suggested that Section 2.2 of the Plan recognises the ongoing work of TCC with TEA.</p> <p>The following additional objectives are suggested;</p> <ol style="list-style-type: none"> <i>“Tipperary County Council will continue to collaborate with the Tipperary energy Agency (TEA), and other relevant energy agencies, to ensure the Local Authority Climate Action Plan, and this Local Area Plan, reflect the ambitions of the National Climate Action Plan.”</i> <i>“Support district heating and centralised biomass/biogas boiler/ heat pump systems, whether private/public or mixture of both, via relaxed /no planning and innovative approaches for easements, for plant and piping, in readiness for future projects.”</i> 	
Consideration:	
<ul style="list-style-type: none"> Submission is noted and welcome. The use of symbols to denote specific climate action measures in the LAP would be a useful tool to immediately recognised climate related actions / objectives / policies. The proposed objectives are well considered and would strengthen the core vision of the LAP to create a sustainable town, and are recommended to be incorporated, albeit the second suggested objective is recommended to be included in a revised form to reflect the limitations of the LAP. 	

Recommendation:

- i. Amend Section 2.2 of the Draft Plan (see Amendment 5 in Part 2)
- ii. Amend Objective 2G and add additional objective to Section 2.5 of Draft Plan (see Amendments 9 & 10 in Part 2)
- iii. Update the final LAP to include 'climate action' symbols to denote specific policies and objectives related to Climate Action (see Amendment 8 in Part 2)

Submission Number:

23

Submission Name:

Thomas Bibby

Submission Summary:

Nenagh Traffic Management Plan

The submission questions the rationale for the “Nenagh Traffic Management Plan” which was submitted as a Section 38 development four months before the Local Transport Plan was released. The Local Transport Plan (LTP) just seems to accept the introduction of this plan, accompanied by a statement “Over the longer-term horizon of the LTP, further enhancements to the proposed one-way system may be feasible through reallocation of road space for public realm upgrades and further provision for active modes”, which is a relatively weak commitment compared to other measures proposed in the plan.

The submission states that the traffic management plan will create severance in the middle of Nenagh for active travel users. Some footpaths proposed will be below DMURS minimum widths, and cyclists will have to navigate dangerous two-lane one-way streets. The submission provides an alternative suggestion to re-allocate road space on the new Nenagh Traffic Management Plan towards active modes to provide safe segregated routes for active travel users and to mitigate against the increased capacity for private cars being introduced in the town centre.

Active Travel Network

The submission welcomes the active travel network proposed as part of the LTP. If implemented over the period of the plan it would have a positive effect on the town.

Public Transport Network

The submission welcomes the retention of the town centre bus stops. The submission has reservations about the proposed Mobility Hub, but as long as buses are stopping in the middle of town where services are accessible to more people, some additional rail/bus integration may be helpful.

Roads

The submission states that the proposed roads do not seem to meet the criteria for new roads outlined in the Local Transport Plan with induced demand for more traffic as a result of such schemes.

The submission also supports the proposed HGV ban but doesn't feel that building new roads are needed to facilitate this ban.

Consideration:

Nenagh Traffic Management Plan

The Nenagh Traffic Management Plan proposals have been through a non-statutory public consultation process and are due to start construction later this year. The implementation of the Nenagh Traffic Management Plan is a key recommendation from the adopted Nenagh Traffic and Transport Plan February 2019. The overall aim of the study is “to secure a more efficient transport network for Nenagh, that would foster the social and business environment of the town, would encourage greater levels of walking & cycling, and would improve road safety and quality of life for the community, thereby facilitating sustainable future growth”.

It is a recommendation of the Local Transport Plan that further public realm and active mode enhancements be investigated within Nenagh town centre, particularly with the development of the Historical Quarter and regeneration of the Town Centre Laneways. The traffic management system is the initial step and catalyst to deliver an ambitious town centre public realm project for Nenagh Town. Scott Tallon Walker Architects have been appointed to progress the preliminary design for the public realm project allowing a greater opportunity to reallocate road space to the active modes within the town core.

Active Travel and Public Transport Network

Positive comments in relation to the active travel network and retention of bus stop locations in the town centre are welcomed.

Roads

The LTP has evaluated the impact of any new roads against sustainable criteria which supports the reallocation of road space to active modes, whilst not providing additional capacity within the network to encourage increased car traffic. The proposed roads which have passed through the Multi-Criteria Appraisal process have been shown to significantly reduce strategic traffic travelling through the town centre which will help improve the safety and environment for active mode users.

The Local Transport Plan supports the proposed HGV restriction. However, care is required to ensure these vehicles are not re-routed onto sensitive streets within the town centre creating additional safety issues. The delivery of the new roads would support the plan and provide viable, safe alternative routes for some HGV traffic leading to a significant reduction in HGVs in the town centre.

Recommendation:

No changes to the Draft LAP recommended.

Submission Number:

24

Submission Name:

Michael O'Connor

Submission Summary:

- Proposals to close O'Rahilly Lane and Abbey Lane which may lead to anti-social behaviour and will restrict movement of Garda vehicles and offer escape routes.
- Lack of shelter spaces in Nenagh.
- Limerick Road cycle lanes hazardous especially at the County Council offices.
- Proposals the Rialto Cinema is may not now be suitable considering 'work from home' supports and improvements in internet connections, suggesting that it may be more suitable to redevelop the site for housing.

The submission notes the following:

- the brick paving on Kickham Street and Sarsfield Street is hazardous when wet.
- Nenagh military barracks is beyond repair and suggests demolition.
- a dog park would be an appreciated amenity
- Banba Square should be developed to offer a full rest and relaxation area opposite the courthouse, with a larger zone for outdoor dining.
- the monument on Banba Square should be kept in place.
- the railings of the Arts Centre could be used for outdoor art exhibitions.

Consideration:

O'Rahilly Street and Abbey Lane Vehicular Closure

The points made related to potential anti-social behaviour are noted. The implementation of car free areas in the town centre, particularly on narrow streets like O'Rahilly Street, have been recommended to encourage more pedestrian activity within the town centre, delivered with the appropriate material palette, landscaping and lighting scheme will create an inviting urban streetscape, similar to other laneways enhanced in Nenagh Town over the last number of years to great success.

There are currently safety issues in these areas with conflicts between pedestrians and vehicular traffic on the very narrow access points. The design of these lane closures could incorporate access for emergency vehicles and local deliveries as required.

Cycle Lanes

With respect to cycle lanes on Limerick Road, it is proposed that this cycle route be upgraded with increased levels of segregation in accordance with the latest Cycle Design Manual guidance.

Rialto Cinema

Points in relation to the Rialto Cinema are noted. However, extensive options for concept development and use of the cinema building have already been explored. The re-use of the cinema for housing would require significant alterations, which would be technically and cultural challenging, if not impossible. It is considered that the redevelopment of the cinema building for an employment use is entirely appropriate and will help deliver a vibrant location for the town centre.

Other points

Points in relation to brick paving, Military Barracks and the provision of a dog amenity park are noted but are beyond the scope of the LAP.

Recommendation:

No changes to the Draft LAP recommended.

Submission Number:	Submission Name:
28	Rosemary Joyce

Submission Summary:

- The submission calls for Cecil's Walk and Quintin's Way to be included in the Primary Retail Area. These areas were included in the Nenagh Town & Environs Development Plan.

Consideration:

It is considered appropriate that the suggested locations are included within the Primary Retail Area, as these locations are important elements of the core service area of the town centre.

Recommendation:

- i. Amend the Primary Retail Area in Map 4 (Town Centre and Regeneration) to include Cecil's Walk and Quintin's Way (see Amendment 67 at Part 2)

Submission Number:

31

Submission Name:

Louise Morgan Walsh (Labour Party)

Submission Summary:Timeline for public to make submissions

Period of time to review documents and make submissions too short. A period of 10 weeks should be provided

CSO Data

Data from the Census 2022 is not shown, and the data included is significantly out of date and must be reviewed.

Chapter 5 – Sustainable Communities

Tipperary County Council (TCC) must review efforts community groups and campaigners to make Nenagh an Autism Friendly Town and make this a policy to support children and young adults with Autism in Nenagh. TCC must also review and liaise with the Government on the Autism Innovation Strategy which was published last April 2023.

Chapter 7 – Our Built, Social and Cultural Heritage

The Military Barracks is not discussed in detail and plans for this site are not clear. The site is important to that people of Nenagh and it is recommended that a masterplan is drafted along with new policies to be implemented on its conservation and future use.

Chapter 9 – Land Use Zoning Framework

The Draft Plan does not mention "EMERGENCY ACCOMMODATION". It is inappropriate for this type of accommodation to be provided in areas zoned, for example, CSI, A or OSR. The zoning matrix needs to be updated so that relevant zoned areas are protected e.g. from exempted development.

Chapter 10 – Monitoring and Evaluation

Statement in the Draft LAP is welcome, and the Plan should be reviewed annually.

Appendix 2 – Local Transport Plan

Welcome the publication of the Plan. TCC should push for car free zones around schools and the development of link roads. We also urgently need a transport hub at the train station and relocation of bus stops to the station. There is limited discussion of this in the LAP.

Consideration:

Timeline for public to make submissions

This is noted. However, the Act limits the scope for extending the public consultation period beyond 6 weeks (it should be noted that public consultation was for a period of 6 weeks and 3 days), as CE reports must be provided to Elected Members within 12 weeks of the publication of the Draft LAP. The timing of plenary meetings of the Council also limits the scope for extending consultation periods. Notwithstanding this, though the documentation is extensive, a period of over 6 weeks is considered reasonable for public consultation, given the thematic breakdown and the availability of officers of the Council to discuss the material throughout the consultation period.

CSO Data

Though elements of the Plan refer to Census 2016 data as a full suite of data from Census 2022 is not available, Section 1.4.2 of the Draft Plan makes it clear that data from Census 2022 is utilised. Where feasible and as further data is release from the CSO, sections of the LAP will be updated to reflect Census 2022 data.

Chapter 5 – Sustainable Communities

The development of Nenagh as an Autism Friendly Town is noted, and the ethos and principles of inclusivity are embedded in the Draft LAP. It is recommended that Section 5.5, Policy 5.4 and Objective 5D are amended to widen the terms of inclusivity and make reference to the development of an Autism Friendly Town in Nenagh.

Chapter 7 – Our Built, Social and Cultural Heritage

The point regarded the barracks is noted. However, it is considered that adequate policies are included in the LAP and the TCDP to appropriate guide redevelopment of this site. As outlined in the response to submission 10 from the Department of the Defence, the Council's Planning Department will readily engage with any potential new owners of the site to support its appropriate and sustainable redevelopment.

Chapter 9 – Land Use Zoning Framework

If development is exempted, land use zonings for a particular use would not preclude development of that type in that land use zoning as planning permission would not be required.

Chapter 10 – Monitoring and Evaluation

This is noted.

Appendix 2 – Local Transport Plan

These points are noted and included within the LTP. A schedule of delivery is set out in the LTP for these projects.

Recommendation:

- i. Amend Section 5.5, Policy 5.4 and Objective 5D of the Draft to reflect the need to make reference to the development of an Autism Friendly Town in Nenagh (see Amendments 15, 17 & 20 in Part 2).

Submission Number:	Submission Name:
34	Iva Pocock (Green Party)

Submission Summary:

- Welcomes the Draft Local Transport Plan (LTP) and supports its implementation, with its emphasis on schools, the proposed dedicated cycle tracks on all roads leading to schools along with the proposed traffic calming measures;
- Welcomes the ambition to create a cycle network for Nenagh and the plan to develop the Nenagh River Greenway and extend it to Dromineer and Lough Derg;
- Dedicated cycle and walkways should be included on all new road schemes, which should also include biodiverse margins;
- Support the introduction of HGV restriction in the town centre and the measures to prevent vehicle access at the junctions of O’Rahilly St and Pearse St, Abbey St and Kenyon St.;
- Proposed mobility hub at Nenagh Train station is welcomed;
- More bus stops are needed throughout Nenagh which should be sheltered, accessible and comfortable.
- Commitment to compact residential growth is welcomed;
- Town Centre Strategy is supported;
- Services should be delivered in tandem with housing development;
- The Council should identify locations for public amenity space and allotments;
- The municipal sports facilities should be expanded in partnership with the Local Sports Partnership;
- The LAP should identify locations for informal recreations amenities such as basketball courts, soccer ‘cages’ and to consider spaces specifically for teenager such as a teen ‘hang out’, to support the development of an Age Friendly Town;
- Flood risk assessments must be revisited frequently.

The following proposals are welcomed in the submission:

- the support for transition to renewable energy for heating and transport
- the support for upgrading of built fabric,
- the commitment to expanding wastewater capacity
- the commitment to Sustainable Urban Design systems

Consideration:

The submission supports a number of the policies and initiatives included with the Draft LAP and this support is noted and welcomed.

Comments with respected to cycle and walkways on all new road schemes are noted and these will be required to be designed in accordance the relevant standards and Design Manuals for Roads and Street (DMURS) which includes requirements to design for active travel modes as a priority

Recommendation:

No changes to the Draft LAP recommended.

Submission Number:

39

Submission Name:

Cllr John Carroll (On behalf of the residents of Benedine & Ballintoher)

Submission Summary:

- There are almost 60 number dwellings without waste water treatment systems in Benedine and Ballintoher, which is greatly impacting on ground water in the general area.
- Request the local authority to work with Uisce Eireann to prioritise the improvement of waste water services to this area to enhance water quality and the environment

Consideration:

- The railway running east-west in Nenagh represents a significant physical constraint and barrier for the delivery of waste water services to the areas to the south of the town. Nonetheless, the areas around Benedine and Ballintoher represent the most significant confluence of dwellings in the town that do have access to municipal waste water services which is likely to have significant impacts on ground water quality in the locality, as waste water is treated individually at each property.
- Further, from a review of mapping undertaken in the preparation of this LAP, it is evident that parts of this area are within a 10-minute walking distance of the urban core and a number of other physical infrastructure services are available. It is reasonable that future expansion of the municipal district waste water services would review the feasibility of delivery services to this area in the first instance.

Recommendation:

- i. Amend Objective 8A of the Draft LAP (See Amendment 39 in Part 2)