



Comhairle Contae Thiobraid Árann
Tipperary County Council

Section 20(3)(c) Planning and Development Act
2000 (as amended)

Chief Executive Report

Draft Roscrea Local Area Plan 2023 - 2029

Tipperary County Council Planning Policy and Projects Unit

May 2023

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PART 1

1.0 Introduction

1.1 Context

Tipperary County Council commenced the process of preparing a new Local Area Plan (LAP) for Roscrea on 24th February 2023 with the publication of a Section 20 notice and the Draft LAP. The Draft LAP was made available for a period of 6 weeks from 24th February 2023 to 11th April 2023 and submissions were invited from stakeholders and the public during this time. This report provides a summary of the 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(3) (c) of the Planning and Development Act 2000 (as amended) states the following:

(c) (i) Not later than 12 weeks after giving notice under paragraph (b), the manager of a planning authority shall prepare a report on any submissions or observations received pursuant to a notice under that paragraph and shall submit the report to the members of the planning authority for their consideration

(ii) A report under subparagraph (i) shall—

(I) list the persons who made submissions or observations,

(II) summarise the issues raised by the persons in the submissions or observations,

(III) contain the opinion of the manager in relation to the issues raised, and his or her recommendations in relation to the proposed local area plan, amendment to a local area plan or revocation of a local area plan, as the case may be, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

This report is prepared pursuant to the foregoing legislative requirements of Section 20(3).

1.4 Public Consultation

The Draft LAP was made available for public consultation during the period 24th February 2023 to 11th April 2023. The Draft LAP was placed on display at the Civic Offices in Clonmel and Nenagh, as well as the Roscrea Library. Consultation procedures included:

- Sending notice of the publication of the Draft LAP to the Minister, Office of the Planning Regulator (OPR) and prescribed authorities.
- Publication of a notice of the proposal in an approved newspaper.
- A public consultation drop-in event was held on 22nd March 2023 at Roscrea Public Library.
- The Public Participation Network (PPN) circulated details of the process to their members;
- A dedicated webpage on the Tipperary County Council consultation portal;
- Details of the proposal were posted to the Planning Twitter page (@PlanningTipp) and the County Council Facebook page, and numerous updates were provided on social media throughout the consultation period.
- Stakeholders were notified.
- The Draft LAP was mentioned and addressed at the events held for the Roscrea Town Centre First Plan.

1.5 Submissions to Draft LAP

19 submissions were received within the statutory consultation period, these are listed in Section 2.0. All submissions received are summarised in Section 3 of this report and a consideration and recommendation from the Chief Executive in respect of each is set out.

One submission was received outside the statutory consultation period. No considerations or recommendations have been provided on this submission.

1.6 Environmental Assessment and Strategic Flood Risk Assessment

The Draft LAP has been subject to Appropriate Assessment Screening (Pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC)), Strategic Environmental Assessment (In compliance with the Strategic Environmental Assessment Directive (2001/42/EC) and in accordance with Article 14A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004) and Strategic Flood Risk Assessment (as per 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009)). As a result of these processes the following reports were published in support of the Draft LAP:

- Strategic Environmental Assessment Environmental Report,
- Natura Impact Assessment Screening Report and Determination, and

- Strategic Flood Risk Assessment.

Section 20 (3) (f) of the Planning and Development Act 2000 (as amended), 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 12 June 2023.

1.7 Next Steps

This report is now submitted to the Elected Members of the Council for their consideration. Workshops will be held with the Elected Members of the Thurles Municipal District in May to facilitate consideration of this report and recommendations contained therein. The matter will be brought before the Elected Members at the Plenary Meeting on 12 June 2023.

As material amendments are recommended by the Chief Executive to the Draft LAP, a further period of public consultation (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, 23 June 2023 until Monday, 24 July 2023, if agreed.

2.0 List of Submissions Received

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

No.	Name	Submission Type
15.	Office of the Planning Regulator (OPR)	Statutory Consultees, State Bodies and other Government Departments
18.	National Transport Authority (NTA)	
4.	Transport Infrastructure Ireland (TII)	
5.	Department of Transport (DoT)	
3.	Office of Public Works (OPW)	
2.	Environmental Protection Agency (EPA)	
7.	Uisce Eireann (UE)	
6.	Department of Environment Climate and Communications	
8.	Department of Education (DoE)	
9.	Health Service Executive (HSE)	
13.	Electricity Supply Board (ESB)	
1.	Dublin Airport Authority (DAA)	
12.	Treacy Cré Sinn Féin Cumann in Roscrea	
10.	Ray and Deirdre McCarthy	Individual Submissions and Zoning Related Submissions
11.	Judy Colclough	
14.	Coulter Architecture for Rory Costigan	
16.	Charles Lamb	
17.	Dominic and Denis Sharpe	
19.	Michael Madden & Denis Madden	

Submissions received outside of the statutory consultation period cannot be considered.

No.	Name	Submission Type
1.	Department of Housing, Local Government and Heritage	Government Department

3.0 Summary and Consideration of Submissions

Submission Number: 15	Submission Name: Office of the Planning Regulator (OPR)
<p>Submission Summary</p> <p>The submission is prepared pursuant to the OPR’s statutory role (Section 31AO of the Planning and Development Act 2000, as amended) which is to ensure consistency with legislative and policy requirements relating to planning. The points made in the submission are outlined below under the headings in which they are presented in the submission:</p> <p><u>Overview:</u></p> <p>The submission commends the significant work undertaken in preparing the Draft LAP and welcomes the preparation of a town centre strategy for Roscrea, the approach to regeneration and rejuvenation of the town centre and the preparation of a Sustainable Travel Plan to inform the LAP.</p> <p>The submission identifies a number of matters that require further consideration, in particular in relation to the SFRA to ensure land at risk of flooding is not zoned for vulnerable development. These are presented under 9 themes in the submission with 3 recommendations and 2 observations. The points made in the themes are outlined below under the relevant theme subheading:</p> <p><u>Consistency with Regional, Spatial and Economic Strategy</u></p> <p>The submission considers the Draft LAP to be generally consistent with the regional policy objectives of the RSES for the Southern Region.</p> <p><u>Consistency with Development Plan and Core Strategy</u></p> <p>The extent of residential zoned lands provision in the Draft LAP is acceptable to the OPR and in compliance with the core strategy allocation under the Tipperary County Development Plan 2022. The submission considers a sufficient supply of zoned land has been provided in the Draft LAP when noted in the context of the density applied when estimating the zoned land requirement and the availability of undeveloped land zoned for Existing Residential, regeneration and within the urban core.</p> <p><u>Compact Growth, Zoning and Infrastructural Services</u></p>	

The submission is satisfied the land use zoning are generally consistent with the requirements of the NPF and RSES in relation to compact growth and notes a Serviced Land Assessment (SLA) has been prepared to inform land use zoning.

The submission **recommends (1)** a review of the SLA is undertaken to ensure all undeveloped residential zoned lands (new, existing and strategic reserve) are included.

Town Centre Regeneration

The submission welcomes the inclusion of the Town Centre First Masterplan (once prepared) as an Appendix to the LAP and the strong policies and objectives in the Draft LAP to support the Town Centre First Masterplan and regeneration generally within the town. The submission supports the land activation strategy for vacancy and regeneration as set out in the Draft LAP

The submission welcomes the identification of Regeneration Sites in the Draft LAP and zoning for Regeneration. The submission includes an **observation (1)** to clearly identify the boundaries of all regeneration sites in appendix 3 of the Draft LAP on the land use zoning map (Zoning Map 1).

Economic Development and Employment

The submission welcomes the strong emphasis on enterprise and employment in the Draft LAP and the inclusion of enterprise and employment lands in the SLA.

The submission strongly supports Policy 4.1 which states new office development with a high number and density of employees shall be located in areas that are supported by public transport and active travel and welcomes the restrictions to development without the benefit of active travel measures.

The submission welcomes the identification of a Primary Retail Area (PRA) and supporting policies and objectives to increase vibrancy and vitality. The submission notes the approach to Retail Warehousing and suggests cross reference to Policy 7-4c) of the Tipperary County Development Plan 2022 in the interests of clarity.

Transport and Accessibility

The submission welcomes the approach to active travel and the preparation of the Sustainable Travel Plan (STP) and the inclusion for an Accessibility to Opportunities and Services (ATOS) analysis in the STP.

The submission welcomes the interventions to the transport network to improve active travel service. An **observation (2)** is made that the LAP confirms and clarifies the active travel

interventions proposed under the Urban Primary Active Travel Route and Urban Secondary Active Travel Route as identified on the STP maps.

Flood Risk Management (recommendation 2)

The submission notes the majority of undeveloped lands located within Flood Zones A and/or B have been rezoned to either Amenity or Town Environs but also notes there are permissible uses within these land use zones, including residential, that are highly vulnerable to flooding and no commentary is included as to whether a plan making Justification Test has been carried out and passed for these lands. The submission also notes there are undeveloped residential zoned lands and lands zoned for a relief road corridor located within Flood Zone A and/or B that have not been subject to a plan making Justification Test.

The submission considers it will be necessary to review the SFRA having regard to the above, and to amend the Draft LAP to rezone these lands at risk of flooding to less vulnerable uses only, unless the subject lands pass the plan-making Justification Test. For sites where only a small proportion is at risk of flooding the submission recommends that a policy objective is included to limit development within the flood risk area to water compatible uses only.

The submission considers it unclear which areas the Justification Test for three areas of existing development relates to and requests that a map of these areas is provided.

The submission welcomes the inclusion of Policy 8.2 which relates to Sustainable Urban Drainage Solutions (SUDS).

Environment, Natural and Built Heritage

The submission welcomes the inclusion of a district heating Policy, supports Objective 5A (Sustainable Energy Communities) of the Draft LAP and welcomes the inclusion of Objective 8C (management of waste). The submission supports Policy 7.3 (protection of built and cultural heritage) of the Draft LAP.

Implementation and Monitoring

The submission notes that the Draft LAP does not include any reference to implementation and monitoring of the policies and objectives of the plan and cites Section 6.5 of the 2013 Local Area Plan-Guidelines for Planning Authorities and Sections 15 of the Planning and Development Act 2000, as amended which set out requirements for LAP implementation monitoring. The requirement to provide for Plan monitoring is **recommendation number 3**.

Consideration

For clarity the considerations are presented under the sub-headings outlined in the foregoing submissions section:

Consistency with Regional, Spatial and Economic Strategy

The points made in the submission regarding the consistency between the Draft LAP and the Regional Spatial and Economic Strategy (RSES) is noted.

Consistency with Development Plan and Core Strategy

The points made in the submission regarding the consistency between the Draft LAP the Tipperary County Development Plan 2022 (TCDP) and its Core Strategy is noted, as is the point made regarding the quantum of residentially zoned lands.

Compact Growth, Zoning and Infrastructural Services

The points made in the submission regarding the consistency between the Draft LAP and compact growth requirements of the NPF and RSES is noted.

The recommendation to undertake a review of the Serviced Land Assessment (SLA) to account for all undeveloped residential zoned lands (existing and new) is noted. The SLA will be expanded to include for all undeveloped residentially zoned lands.

Town Centre Regeneration

The points made in the submission regarding the Town Centre First Masterplan and land activation strategy are noted and welcomed.

The observation to clearly identify the boundaries of all regeneration sites identified under Appendix 3 on Map 1 of the LAP, is noted. It is considered that these sites are clearly identified on the maps included under Appendix 3 and that this is sufficient to illustrate same. Some of the site are small in size and their inclusion on Map 1 may lead to issues with legibility given the size at which the zoning map is produced.

Economic Development and Employment

The points made in the submission regarding the emphasis on enterprise and employment, the provisions of Policy 4.1, the identification of the Primary Retail Area and supporting policies to increase vitality and vibrancy in the town centre are noted and welcomed.

Regarding Retail Warehousing, the submission suggests cross reference to Policy 7-4c) of the Tipperary County Development Plan 2022 in the interests of clarity. This can be incorporated through an amendment to Section 3.5 of the Draft LAP.

Transport and Accessibility

The points made in the submission regarding the approach to active travel are noted and welcomed.

Observation 2 requests clarification on the active travel interventions proposed under the Urban Primary Active Travel Route and Urban Secondary Active Travel Route as identified on the Sustainable Travel Plan (STP) maps. Table 5.2 of the STP provides a long list of Sustainable Travel interventions that may be delivered subject to receipt of funding and this Table sets out interventions proposed for the identified Urban primary and Urban secondary active travel routes. The identified active travel routes are broadly in line with the routes identified under the Cycle Connects proposals for Roscrea as developed by the National Transport Authority (NTA)¹, and the 'Urban Primary' and 'Urban Secondary' routes identified are developed in accordance with the definitions set out in Cycle Connects. At this stage the interventions proposed are high-level and it is not possible to conform precise measures proposed for these routes.

Flood Risk Management

Regarding flood risk the approach taken in the draft LAP has been to clearly identify Flood Zones A and B using available CFRAMS data and to ensure that development that takes place within the identified flood risk zones is appropriate from a flood risk perspective. The approach taken has been to zone undeveloped lands within Flood Zones A and B for Amenity or Town Environs use. It is acknowledged that there are some permissible uses within these zones that are vulnerable to flooding. In addition, there are a small number of instances where lands zoned for Existing Residential, Community Services and Infrastructure and Employment use are located within Flood Zones A/B and where this arises only a small proportion of the lands are identified as at risk of flooding.

Inappropriate development from a flood risk perspective would not be permitted and to ensure this it is recommended to add a note to Table 9.2: Zoning Matrix to clarify that under all Land Use Zoning Objectives (apart from where the Justification Test outlined in the Flood Risk Management Plan has been passed) development shall be limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B (as per the Planning System and

¹ <https://consult.nationaltransport.ie/sites/default/files/CycleConnects%20-%20Tipperary%20Urban%20Cycle%20Networks.pdf>

Flood Risk Management Guidelines 2009), and detailed site-specific Flood Risk Assessment will be required in these areas. This limitation shall take primacy over any other provision relating to the land use zoning objectives.

A review of the SFRA and Justification Test has been undertaken as recommended in the submission and a map included in the SFRA to clearly identify the lands that have passed the justification test.

The plan making Justification Test has been passed for the following Land Use Zonings:

- The existing in-use meat processing facility off the R421 (zoned Employment);
- The existing in-use adjacent supplies and repair facility off the R421 (zoned Employment);
- The existing in-use animal feed store off Abbey Street (zoned Employment);
- The former pharmaceutical complex and adjoining commercial complex off the N62 (zoned Regeneration); and
- The existing in-use town centre (zone Urban Core).

The Traffic and Transportation Plan 2017 for Roscrea has indicated a need to incorporate a long-term objective to develop a western relief route to remove M7 to N62 traffic from the town centre. Given the constraints that currently exist within Roscrea in accommodating through traffic on the N62 and the desirability of reducing the impact of same on the town centre the objective for a relief road should remain. The identified route corridor is indicative only, its inclusion in the LAP reflects its provision under the 2017 Traffic and Transportation Plan. The 'north-south' nature of the required connection will necessitate traversing the course of the 'west-east' Bunnow River at some point. A Plan making Justification test has been undertaken in relation to this infrastructure. Progression of any western relief route to remove M7 to N62 traffic from the town centre will require detailed Multi Criteria Assessment against the National Investment Framework for Transport in Ireland (NIFTI) requirements and full environmental assessment. In order to clarify the status of the western relief route as indicative only the wording of Objective 6E, Section 6.4.1 and Policy 6.5 of the draft LAP to be amended.

The point made in relation the need for appropriate consent from the Commissioners under Section 50 of the Arterial Drainage Act 1945 is noted.

The points made regarding the approach to sustainable urban drainage is noted and welcomed.

Environment, Natural and Built Heritage

The points made regarding the inclusion of a district heating policy, Objective 5A (Sustainable Energy Communities) Objective 8C (management of waste) and Policy 7.3 (Protection of Built and Cultural Heritage) are noted and welcomed.

Implementation and Monitoring

In response to the points made in the submission, it is recommended to alter the Draft LAP it includes a separate section on implementation and monitoring. Section 2.4.5 of the Draft LAP sets out provisions for monitoring and same can be omitted with greater clarity on monitoring outlined through a separate section in the Draft LAP.

Recommendation

It is recommended that the following amendments to the Draft LAP are made:

1. The Serviced Land Assessment to be reviewed to account for all existing and new residential zoned lands (See amendment 32, Additions to Serviced Land Assessment in Appendix 1 and Amended Map A in Appendix 2 in Part 2).
2. Section 3.5 of the LAP to be amended to include cross reference to Policy 7-4 (retail warehousing) of the TCDP (See amendment 11 in Part 2).
3. The SFRA to be updated and a note added to Table 9.2 of the written statement to address the submission recommendations regarding flood risk (See amendments 28, 54 and 55 and Appendix 3 in Part 2).
4. Objective 6E, Section 6.4.1 and Policy 6.5 of the draft LAP to be amended to reflect the indicative status of the western relief route corridor (See Amendments 15 and 17 in Part 2).
5. Monitoring provisions to be incorporated into the LAP, a new Section 10 to be inserted after Section 9 of the LAP. Section 2.4.5 to be deleted (See amendment 7 and 29 in Part 2).

Submission Number: 18

Submission Name:

National Transport Authority (NTA)

Submission Summary

The NTA welcome the preparation of a Sustainable Transport Plan as part of the Draft LAP. Regarding same the submission considers the mode split targets for work and education trips should be regarded as minimum targets and confirms the NTA will work with the Local Authority to exceed them.

The submission sets out a number of comments and recommendations on sections of the LAP as follows:

- Appendix 2 Section 3.5 Accessibility to Opportunities and Services (ATOS)- The submission recommends wording changes to Section 3.5 Accessibility to Opportunities and Services (ATOS) of the Sustainable Transport Plan to define an ATOS.
- Appendix 2 Section 3.5 Accessibility to Opportunities and Services (ATOS)- The submission recommends an ATOS analysis against the LAPs proposed Sustainable Transport Measures, using the Roscrea Sustainable Transport Plan Map (Figure 18) as a basis. This is to assess the effectiveness of the Draft Plan's sustainable transport objectives.
- Appendix - 4.0 Mode Share Targets - The mode shift targets set out in Table 4.1 for cycling and walking are lower than those for Tipperary as a whole. The differences require further explanation as does the minimum of 15% basis for the Education mode. It is unclear if or how the baseline accessibility analysis has been used as a basis for mode shift targets.
- 6.4 Roads Strategy, Policy 6.5 & Objective 6E (new western relief route) - The submission notes the Draft LAP's policy and objective relating to the provision of a new western relief road for Roscrea and the constraints within Roscrea in accommodating non-local traffic on the N62. The submission emphasises the need for investment in any additional road capacity to be justified through a clear demonstration of the benefits arising, in terms of reducing dependency on the private car, facilitating the effective operation of and access to public transport services into and through the town and facilitating the use of walking and cycling modes for local trip making (as per the approach contained in the National Investment Framework).
- Objective 6C Bus Services, Infrastructure and Facilities- The NTA would welcome the investigation of arrangements relating to the location of bus stops which effectively cater for the existing and future new and reconfigured services to be provided under the Connecting Ireland and Local Link programmes. It is recommended that any emerging options to relating to the location or relocation of bus stops would be considered in consultation with the NTA and on the basis of the following:
 - Bus routeing requirements and local traffic management;
 - Proximity to the town centre;
 - Distance between adjacent stops;
 - Provision for a fully accessible facility; and
 - Potential for high-quality passenger facilities.

Consideration

The recommended wording changes to Section 3.5 of Appendix 2 (Sustainable Travel Plan), that describe the ATOS tool and its function, can be incorporated into LAP as a text amendment.

In response to the submission from the NTA an ATOS analysis was carried out on land use proposals under the draft LAP in order to assess the implications of the future residential development patterns upon accessibility. Growth was apportioned to each small area in accordance with the TCDP Core Strategy projections. As the LAP approach is for consolidated development and the regeneration of town centre and infill sites as opposed to the identification of new growth areas, and the fact that no new school locations are proposed, it was anticipated that the ATOS would not return significant change from existing levels. The results did demonstrate that the percentage of population living within 15-minute walking distance of a secondary school will rise from 38% to 43% and the percentage of people living within a 6.5-minute walk of a primary school will rise by 3%. No changes to the baseline scenario for walking to employment areas were recorded. The results showed improved scores for walking to parks / amenity areas. Section 3.5 of the Sustainable Travel Plan is to be updated to include commentary on the ATOS analysis of the LAP zoning proposals.

The active travel interventions proposed within Appendix 2 Sustainable Transport Plan are anticipated to have a positive impact upon journey times for pedestrians and cyclists to schools, employment and services, it is outside of the scope of the ATOS to quantify such data.

In response to the comments regarding the mode share targets it is proposed that same are amended to be brought in line with the mode share targets for the County with the figures for Roscrea set as a minimum given the urban profile of the settlement and strong potential for work and education trips within the settlement to be made by walking, cycling and public transport. Section 4, Table 4.1 and Table 4.2 the STP can be amended to reflect this.

The points made in the submission regarding the need for investment in additional road capacity (western relief road) to be justified through demonstrating the benefits arising in the context of the approach outlined under the National Investment Framework for Transport in Ireland (NIFTI) are noted. The Traffic and Transportation Plan 2017 has indicated a need to incorporate a long-term objective to develop a western relief route to remove M7 to N62 traffic from the town centre. Given the constraints that currently exist within Roscrea in accommodating through traffic on the N62 and the desirability of reducing the impact of same on the town centre the objective for a relief road should remain. The Council notes that any funding for this roadway will require justification against the investment and intervention hierarchy as set out under the NIFTI publication.

Figure 6: NIFTI Modal Hierarchy

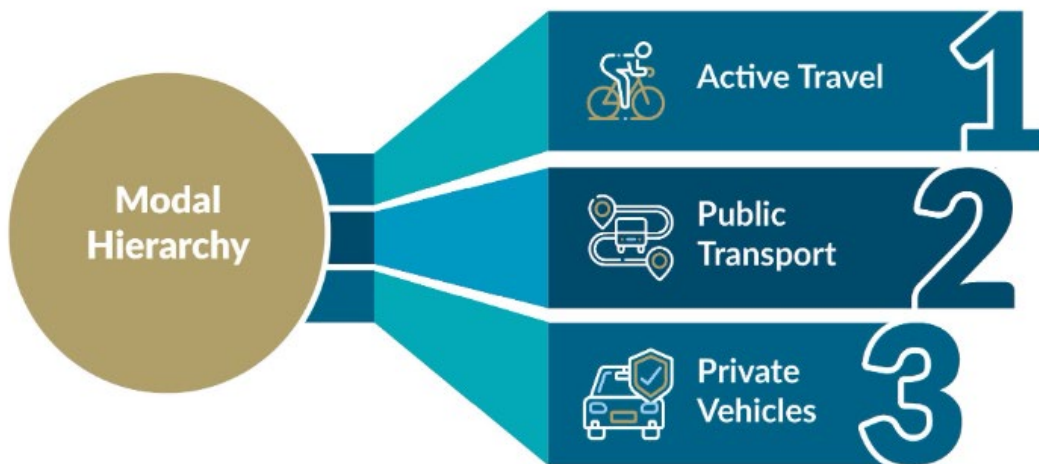


Figure 7: NIFTI Intervention Hierarchy



The comments recommendation that that any emerging options relating to the location or relocation of bus stops would be considered in consultation with the NTA and on the basis of certain criteria is noted, this is accounted for under Objective 6C in the Draft LAP. Section 6.2 of the LAP can be expanded to incorporate the NTA recommendation regarding location / relocation of bus stops.

Recommendation

It is recommended that the following amendments to the Draft LAP are made:

1. Sections 3.5, 3.5.1 and 3.5.2 of the Sustainable Travel Plan (STP) to be amended to describe the ATOS tool and its function and to include commentary on the ATOS analysis of the LAP zoning proposals. (See amendment 36, 37 and 38 in Part 2).
2. Section 4 and Tables 4.1 and 4.2 of the STP to be amended to ensure the modal share targets are in line with County targets and are set as minimum targets (See Amendment 39 in Part 2).
3. Amendment to Section 6.2 of written statement to incorporate the NTA recommendation regarding location / relocation of bus stops (See amendment 14 in Part 2).

Submission Number: 4

Submission Name:

Transport Infrastructure Ireland

Submission Summary

The submission acknowledges the significant work in preparing and publishing the Draft LAP and notes that same incorporates a Sustainable Travel Plan into the land use planning framework for Roscrea.

The submission outlines the importance of national roads within Irelands overall transport network and cites the following EU, National and Regional Policies that relate to maintaining the strategic transport function and safety of national roads:

- The TEN-T regulations identifies proposals for the development/improvement of an EU wide network of roads, rail lines, waterways, shipping route, ports etc and associated infrastructure.
- National Planning Framework National Policy Objective no. 74 secures the alignment of the National Planning Framework (NPF) and the National Development Plan (NDP) through delivery of National Strategic Outcomes (NSO).
- NSO 2 of the NPF includes the objective to maintain the strategic capacity and safety of the national roads network. In addition, Chapter 7 ‘Enhanced Regional Accessibility’ of the NDP sets out the key sectoral priority of maintaining Ireland’s existing national road network to a robust and safe standard for users.
- National Investment Framework for Transport in Ireland (NIFTI) and the National Sustainable Mobility Policy as well as existing Statutory Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012)

- Southern Regional Assembly (SRA) Regional Spatial and Economic Strategy (RSES) includes Regional Policy Objective (RPO) 140 outlining the requirements relating to maintaining and protecting the strategic transport function of national roads. RPO 151, RPO 152 and RPO 157 provide guiding principles for the integration of land use and transport planning and objectives related to Local Area Planning and Local Transport Planning.

The submission advises that the M7 is included as part of the EU Trans European Transport networks (TEN-T) and notes the important inter and intra-regional access provided by the N62.

The submission considers that policies and objectives are required, in accordance with the provisions of the foregoing higher-level plans and programmes to maintain the strategic capacity and safety of the network of national roads. The following recommendations are included in this regard under topics as they are presented in submission:

DEVELOPMENT STRATEGY AND NATIONAL ROADS

- i) That the Draft LAP incorporates an amendment to reflect the national objectives as outlined in the NPF, NDP, RSES, NIFTI, these objectives are summarised as follows:
 - a) to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements, in the local plan area, and
 - b) to ensure that the existing transport networks in the local area plan area, which have been greatly enhanced, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

LOCAL AREA PLAN/LOCAL TRANSPORT PLAN INTEGRATION

- i) The LAP and STP are reviewed prior to finalisation to clarify and demonstrate the approach to support compact growth and provide active travel and sustainable transport provision in Roscrea, complementary to safeguarding the function of the strategic national road network in the area and, more particularly, how the measures identified in the STP safeguard that strategic function in accordance with the provisions of official policy.
- ii) Acknowledgment of complementary TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084) in relation to design standards to be applied to national roads and national road junctions to be included in the LAP and in the STP prior to finalisation.
- iii) As well as the foregoing, the Council will be aware that 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).

SPECIFIC LOCAL AREA PLAN OBJECTIVES

Roscrea Western Relief Road

i) In accordance with National Development Plan investment objectives, TII's priorities relate to safeguarding the levels of safety and capacity of the existing strategic national road network in the area.

ii) Any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII and be developed, subject to an appropriate evidence base, in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012) and the requirements of TII Publications.

Neighbourhood Accessibility

i) In the interests of road user safety, TII recommends that proposals should seek to utilise non-national road links and connections in the first instance.

ii) Any works to national roads shall adhere to TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084) to complement DMURS and shall be subject to Design Report requirements in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).

MAINTAINING THE STRATEGIC CAPACITY AND SAFETY OF THE NATIONAL ROAD NETWORK

i) The Council is requested to reference TII Publications and the requirement for RSA in the Draft Local Area Plan relating to development proposals with implications for the national road network.

ii) The Council is requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Local Area Plan relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.

iii) The Authority would welcome the provisions of the TII Policy and the DoECLG Guidelines incorporated into the Local Area Plan.

iv) Having regard to the extensive national road network in Tipperary, TII would welcome consideration of a new Objective included in the Local Area Plan outlining that; 'The capacity and efficiency of the national road network drainage regimes in Tipperary will be safeguarded for national road drainage purposes'.

- V) TII would welcome consideration being given to including an objective in the Local Area Plan, in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection cable routing should seek to utilise available alternatives, as opposed to being placed along the strategic national road network contrary to the provisions of official policy.
- vi) The Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Local Area Plan

OTHER

- i) Consultation with the Councils own internal project and/or design staff is recommended in relation to Greenway proposals.

Consideration

For clarity the considerations are presented under the sub-headings outlined in the foregoing submissions section:

DEVELOPMENT STRATEGY AND NATIONAL ROADS & MAINTAINING THE STRATEGIC CAPACITY AND SAFETY OF THE NATIONAL ROAD NETWORK

Section 1.1 of the draft LAP states that the provisions of the Tipperary County Development Plan 2022-2028 (TCDP) will apply to all new development in conjunction with the LAP. The TCDP contains a number of policies and objectives to maintain the strategic capacity and safety of the national roads network and associated road drainage on national routes. These are listed hereunder;

- Section 12.5.2 Safeguarding the Strategic Road Network.
- Policy 12-4 (maintenance of safety, capacity and efficiency of national road network).
- Policy 12-8 (national road drainage).

The following publications and guidelines cited in the submission from TII are referenced in the TCDP as follows:

- Trans-European Networks Regulations (Policy 12-4)
- DoECLG Spatial Planning and National Roads Guidelines 2012. (Policy 12-4)
- The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084) (Policy 12-6)
- TII Traffic & Transport Assessment Guidelines (2014) (Section 6.2 of Volume 3).
- Publications GE-STY-01024 Road Safety Audit (Section 6.3 of Volume 3).

The Draft LAP and TCDP does not refer to the following publication

- Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes (TII Publications DN-GEO-03030).
- TII Policy on Provision of Tourist & Leisure Signage on National Roads (March 2011).

The policies, objectives and standards contained in the TCDP that relate to national roads will apply to development coming within the Roscrea LAP area and on this basis, it is not proposed to repeat all the policy requirements under the LAP as they are already accounted for in the TCDP. However, in order to address the requirements of TII and ensure the LAP reflect the need to protect the safety, capacity and efficiency of national roads a new section can be added to the draft LAP under section 6.3 entitled Safeguarding the Strategic Road Network. The guidance documents and publications referenced in TII's submission can be referenced in this section. In addition, a new objective can be included under Section 6.5 to control the proliferation of non-road traffic signage on and adjacent the national road within the LAP area.

The considerations and recommendation relating to Renewable Energy and Grid Connection are noted. The Tipperary County Development Plan 2022 (TCDP) does not contain objectives that require grid connection cable routing from renewable energy developments to avoid being placed along the strategic national road network. It is considered that such decisions should be made at individual project stage where the particular circumstances of each case can be evaluated.

The recommendations regarding noise are captured under the Tipperary County Development Plan 2022 under Objective 11-H. The provisions of the TCDP are fully applicable to the Draft Roscrea LAP and thus, are not repeated in the Draft LAP.

LOCAL AREA PLAN/LOCAL TRANSPORT PLAN INTEGRATION

The recommendation to review the LAP and STP prior to finalisation to clarify and demonstrate that the proposals in same are complementary to safeguarding the function of the national road network are noted. The proposals contained in the LAP and STP to support compact growth and active travel are high level. Should these progress to more detailed design the provisions of the TCDP and LAP that relate to safeguarding the strategic road network will ensure same are designed and developed in a manner that maintains the strategic function and safety of the N62, in consultation with TII.

SPECIFIC LOCAL AREA PLAN OBJECTIVES

Roscrea Western Relief Road

The commentary regarding the proposals for the western relief route are noted. The policies and objectives and standards contained in the TCDP as referenced above will ensure the proposed relief route is designed and developed in a manner that maintains the strategic function and safety of the N62, in consultation with TII. In order to ensure that further options and design of this road meets the required standards, it is recommended to amend the wording of policies within the Draft Plan.

Neighbourhood Accessibility

The points made in the submission that proposals for neighbourhood accessibility should seek to utilise non-national road links and connections in the first instances are noted. Given the location of the N62 and provisions of the STP it is not considered practical to include a preference in the LAP to utilise non-national routes in the first instance.

Adherence to the TII publications referred to in this subsection have been addressed.

OTHER

The points made regarding consultation in relation to greenway proposals are noted.

Recommendations

It is recommended that the following amendments to the Draft LAP are made:

1. A new sub-section is added under Section 6.4 of the LAP to address the requirement for development to safeguard the strategic road network and to reference the relevant publications/guidance documents relating to development on/affecting national roads (See amendment 16 in Part 2).
2. A new objective to be added to Section 6.6 to control the proliferation of non-road traffic signage on and adjacent to national roads. (See amendment 17 in Part 2).
3. Policy 6.5 of the Draft Plan to be amended to address the considerations regarding the western relief road (See amendment 17 in Part 2).

Submission Number: 5

Submission Name:

Department of Transport (DoT)

Submission Summary

The submission highlights important policy developments and recommendations relevant to accessible, integrated and sustainable public transport and considers same should be reflected in the LAP. These are:

- The National Disability Inclusion Strategy (NDIS) 2017-2022, particularly action 108 and 109.
- United Nations Convention on the Rights of Persons with Disabilities (UNCRCRDP-Ratified by Ireland in 2018). This places obligations on State Parties to ensure access for persons with disabilities to physical environment and transportation.
- DMURS Interim Advice Note – Covid-19 Pandemic Response (2020)- The submission recommends the references in the Draft LAP to the 2019 version of DMURS is replaced with reference to the foregoing 2020 version.
- Connecting Ireland Rural Mobility Plan (2022-2025).
- Universal design to consider a whole journey approach to development.

The submission advises that the Department of Transport can assist in developing appropriate text in the Local Area Plan regarding integrated, accessible transport.

Consideration

Policies, objectives and actions regarding transport and connectivity are set out under Section 6- Transport and Connectivity and Appendix 2- Sustainable Travel Plan of the Draft LAP. Section 5 of the LAP sets out objectives to support the development of Roscrea as an age-friendly town.

The Sustainable Travel Plan (STP) was prepared to support the policies for transport planning as set out in the Draft LAP and to support investment in associated infrastructure improvements. Section 2.0 of STP sets out the strategic policy documents that provided a context for the preparation of the STP and it is acknowledged that same do not reference the following documents cited in the submission from the DoT:

- The National Disability Inclusion Strategy (NDIS) 2017-2022.
- United Nations Convention on the Rights of Persons with Disabilities (UNCRCRDP-Ratified by Ireland in 2018).
- DMURS Interim Advice Note – Covid-19 Pandemic Response (2020).

Section 2.0 of the STP can be amended to include reference to the foregoing. The LAP and STP can be updated to refer to the current version of DMURS and supplementary Advice Notes.

The STP under section 5.1.2 references the Connecting Ireland Rural Mobility Plan (2022-2025).

The text of Section 6.4.1 and Policy 6.2 of the LAP can be amended to require that proposals within the LAP area account for accessibility for all users, in particular persons with disabilities, reduced mobility and older people. It is noted that Policy 12-1 of the TCDP accounts for providing a 'whole journey approach' to make public transport fully accessible to people with disabilities'.

Recommendation

It is recommended that the following amendments to the Draft LAP are made:

1. Section 2.1 and 2.3 of the Sustainable Travel Plan (STP) to be amended. (See amendment 34 and 35 in Part 2).
2. Section 6.4.1 and Policy 6.2 to be amended to include for accessibility and universal design. (See amendment 15 and 17 in Part 2).
3. The LAP and STP to be updated to refer to the current version of DMURS and supplementary Advice Notes (See amendment 35 in Part 2).

Submission Number: 3

Submission Name:

Office of Public Works

Submission Summary

1. 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 8.4
 - Policy 8.2 and Objective 8B in relation to integrating SuDS and nature-based solutions into all development proposals and new public realm and public sector development.
2. The SFRA makes references to a *Constrained Land Use*. While a *Constrained Land Use* was used in the County Development Plan, there is no *Constrained Land Use* zoning or objective included in the Draft Local Area Plan or Zoning Map. It would be useful if a map of the location of these sites / land use zonings could be included.
3. Instead of completing the third criterion, the Justification Test has included, "*SFRA recommendation integrated into the Plan for management of risk*". Each Justification Test has answered yes and states "*see provisions repeated in Section 4 of this report*". Justification Test for development plans should be as per Box 4.1 of the Guidelines. While Section 4 includes all the County and Local Area Plan policies and possible structural and non-structural measures, this section is very long, and it is difficult to ascertain which are

relevant to the zoning. It would be better if the relevant details could be repeated or if more specific references could be made to applicable details contained in Section 4.

4. There are a number of proposed land use zonings, some of which are classified as highly vulnerable development in the Guidelines, which have been described as being in Flood Zones A and B, for which no commentary has been included to indicate that the Plan Making Justification Test has been applied and passed. Any lands that are undeveloped within Flood Zones A and B, where inappropriate development is proposed, should be rezoned as a water compatible type zoning in Flood Zone A, and less vulnerable or water compatible type zoning in Flood Zone B, unless it can be demonstrated by the Planning Authority that all criteria of the Plan Making Justification Test have been satisfied.
5. There are *Existing Residential* zonings located within Flood Zone A or B, some of which have a small area of the zoning overlapping with the flood zones. Highly vulnerable development is not considered appropriate in Flood Zone A or B unless a Plan-making Justification Test completed by the local authority can be satisfied. Please see comments above in relation to *Existing, Developed Zoned Areas and Sites with Small Proportion at Flood Risk. (Maps are provided)*.
6. There are a number of *Community Services and Infrastructure* zonings with a small proportion of the zoning within Flood Zone A or B. Some of the development type uses permitted within the zoning are classified as highly vulnerable and this type of development is not considered appropriate in Flood Zone A or B unless a Plan-making Justification Test completed by the local authority can be satisfied. Please see comments above in relation to *Existing, Developed Zoned Areas and Sites with Small Proportion at Flood Risk*.
7. There is a *Community Services and Infrastructure* zoning to the east of the town, with a small proportion of Flood Zone A through the site. A Plan-making Justification Test has not been supplied for this zoning, however this site is located at the periphery of the Local Area Plan and would not satisfy all criteria of the Test. Criteria 2 requires that only land use zonings within or adjoining the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions), of settlements which have been targeted for growth can pass the Plan Making Justification Test. Therefore, the Justification Test would not be applicable to the periphery of urban areas as the zonings / development cannot satisfy Criteria 2. Any lands that are undeveloped within Flood Zones A and B, where inappropriate development is proposed, should be rezoned as a water compatible type zoning in Flood Zone A, and less vulnerable or water compatible type zoning in Flood Zone B.

8. There are some *Employment* zonings with a small proportion of the zoning within Flood Zone A. This type of development is considered less vulnerable in the Guidelines. Less vulnerable development is not considered appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied. Please see comments above in relation to *Existing, Developed Zoned Areas and Sites with Small Proportion at Flood Risk*.
9. The land use zoning type *Town Environs* permits agricultural buildings / structures and residential development is also open for consideration in the zoning. It should be noted that land and buildings used for agriculture are considered less vulnerable development and dwelling houses are considered highly vulnerable type development in the Guidelines. Highly vulnerable development is not considered appropriate in Flood Zone A or B and less vulnerable development is not considered appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied. This land use zoning is unlikely to satisfy all criteria of the Plan Making Justification Test. Consideration might be given to policies and objectives limiting development of inappropriate vulnerability in flood risk areas, such as only water compatible development is permitted in Flood Zone A and water compatible and less vulnerable development is permitted in Flood Zone B.
10. The Guidelines classify essential infrastructure such as primary transport as highly vulnerable, and the zoning would not be appropriate in Flood Zones A and B unless a Plan Making Justification Test, completed by the local authority can be satisfied. Local transport infrastructure is classified as less vulnerable and the zoning would not be appropriate in Flood Zones A unless a Plan Making Justification Test, completed by the local authority can be satisfied.
11. It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.
12. Tipperary County Council might consider including an objective similar to Policy 11 – 10 (b) of the County Development Plan “*Consult with the OPW in relation to proposed developments in the vicinity of Flood Relief Schemes and drainage channels and rivers for which the OPW are responsible, and to retain a strip on either side of such channels, where required, to facilitate maintenance access thereto*”. This will ensure that full regard in the preparation of Local Area Plan is given to the proposed development of a flood relief

scheme in Roscrea, to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures.

13. PFRA indicative flood maps have been superseded by the recently published national indicative fluvial, coastal and groundwater flood mapping, and therefore the mapping provided in 2012 should no longer be used. Planning Authorities may need to carry out their own Flood Risk Assessments to inform the definition of Flood Zones for areas less than 5km² that were not included in the National CFRAM and NIFM Programmes.
14. Reference is made to the PFRA pluvial maps in Section 3.5 Sustainable Drainage Systems and the Surface Water Guidance and Strategy of the SFRA states that *“PFRA indicative pluvial maps (2012) are not considered to be reliable for the purposes of zoning or decision-making”*. The OPW do not intend to update the PFRA indicative pluvial maps, as it is not appropriate to map flooding from this source through a national-scale assessment, and maps would be more robust if produced at the community / local scale. While this dataset has not been superseded like the fluvial, coastal and groundwater it should also no longer be used by local authorities. To avoid confusion Tipperary County Council may consider stating that these maps should not be used to assess pluvial flood risk.
15. It is stated in Section 8.5 Flood Risk Management of the Draft Plan, that *“Both the risk from fluvial and pluvial flooding were considerations as part of the review of land zoning”*. It should be noted that the flood zones are determined on the basis of the probability of river and coastal flooding only. Section 8.5 Flood Risk Management of the Draft Plan also notes *“that there are areas in Roscrea, due to its underlying geology, that may be subject to intermittent ground water and pluvial flooding”*. Tipperary County Council may consider producing pluvial maps for inclusion in the Plan.
16. It is stated that there is no discussion on climate change in relation to flood risk management. The OPW recommend that the Draft Plan addresses how climate change has been considered in the production of this plan.
17. The submission identifies an incorrect website reference in Table 3 of the SFRA.

Consideration

For clarity the considerations are presented in numerical order that relate to the points in the foregoing submissions section:

1. The comments regarding Policy 8.4 (Flood Risk), Policy 8.2 and Objective 8B (Nature based Suds) are noted and welcomed.
2. The lands constrained by flooding are identified on the LAP zoning map where Flood Zones A and B have been clearly mapped. A constrained land use zoning objective is not included in the LAP (references to constrained land use where included in error in the SFRA and will be removed). The approach taken has been to zone undeveloped lands that come within Flood Zones A and B for Amenity or Town Environs, to include policies and objectives to avoid vulnerable development (to flood risk) on lands and to clearly identify lands at risk of flooding on the LAP zoning Map. This combination of measures is to ensure inappropriate development from a flood risk perspective within areas at risk of flooding is avoided.
3. Table 7 of the Strategic Flood Risk Assessment (Appendix 7 of the Draft LAP) identifies the areas that have been subject to the plan making Justification Tests. A map of these areas will be included for clarity. Table 7 will be amended to include the criteria required for Plan Making Justification tests as set out under the Planning System and Flood Risk Management Guidelines.
- 4-10. These points have been addressed in the consideration and recommendation to the submission from the OPR.
11. The requirement for consent from the Commissioners under Section 50 of the Arterial Drainage Act 1945 in respect of construction, replacement or alteration of bridges and culverts over any watercourse is noted. This requirement is set out under the TCDP, Section 1.1 of the Draft LAP which states that the provisions of the TCDP will apply to all new development in conjunction with this LAP.
12. Section 4.3 of the Roscrea Draft LAP SFRA sets out the provisions for Flood Risk Management as they are set out in the Tipperary County Development Plan 2022 – 2028 (TCDP). All provisions of the TCDP including those relating to SFRA are fully applicable to the Draft Roscrea LAP and thus, are not repeated in the Draft LAP.
13. The flood risk data used to inform the SFRA is taken from the CFRAM programme developed by the OPW. The comments regarding the use of PFRA data is noted.
14. Section 3.5 of the SFRA outlines that the PFRA pluvial maps were not taken into account in the delineation of flood zones. It also states that pluvial flooding is likely to be present in

local low-lying areas and that needs to be considered in respect of development in such areas. Such consideration may require site specific flood risk assessment. This requirement is accounted for under Section 8.5 of the Draft LAP. Policy 8.4(e) and Section 8.5 of the Draft LAP will be updated to remove the reference to pluvial flooding.

15. See point 14 above

16. Flood risk in relation to climate action is referred to under Draft Plan Section 2.2 “A Climate Resilient, Sustainable and Low-Carbon Town” and various flood risk management provisions from the County Development Plan and the draft LAP explicitly integrate climate change considerations. Flood risks and climate change is specifically referenced in Section 3.4 of the SFRA. In order to address the points made by the OPW regarding climate change and flood risk it is proposed to add additional text to Section 8.5 and Policy 8.4 d) of the draft LAP and to amend text in Section 3.4 of the SFRA. Maps can be included in the SFRA to illustrate the LAP zoning relative to CFRAM potential future scenario mapping.

17. Table 3 of the SFRA to be updated to include the correct website reference.

Recommendation

It is recommended that the following amendments are made to the Draft LAP:

1. Section 4.5 of the SFRA to be amended to include maps that illustrate the lands to which the Justification Test relates (See amendment 55 and Appendix 3 in Part 2).
2. Table 7 of the SFRA to be amended to reflect the criteria set down under Planning System and Flood Risk Management Guidelines 2009 (See amendment 54 in Part 2).
3. Policy 8.4(e) and Section 8.5 of the Draft LAP will be updated to remove the reference to pluvial flooding (See amendments 24 and 25 in Part 2).
4. Section 8.5 and Policy 8.4d) to be amended to address requirements regarding climate change (See amendments 24 and 25 in Part 2).
5. Section 3.4 of the SFRA to be amended to illustrate climate change considerations (See (See amendment 52 and 53 in Part 2).
6. Overlays to be included in SFRA of land use and CFRAM potential future scenario mapping (See amendment 56 and Appendix 2 in part 2).
7. Table 3 of the SFRA to be amended to include for reference to www.floodinfo.ie (See amendment 51 in Part 2).

Submission Number: 2	Submission Name: Environmental Protection Agency
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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 taken into account 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 submission provides recommendations on integrating environmental considerations into developing Local Authority land use plans and any alterations to the plans, on the content of SEA Environmental Reports, in preparing SEA Statements and in consulting with Environmental Authorities. These recommendations relate to the steps required under the SEA Regulations:

- SI No. 426 of 2004 - the Planning and Development (Strategic Environmental Assessment Regulations 2004, as amended by SI No. 201 of 2011- the Planning and Development (Strategic Environmental Assessment Regulations 2011, as amended

Strategic Environmental Assessment (SEA) has been prepared in respect of the Draft LAP in accordance with the above referenced Regulations. The requirements of legislation, guidance and best practice that governs SEA will be adhered to throughout the plan making process.

The submission does not contain any specific comments on the content of the Draft LAP or accompanying SEA Environmental Report.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 7

Submission Name:

Uisce Eireann (UE)

Submission Summary

The submission presents comments on the following:

- **Sustainable Drainage and Green-Blue Infrastructure**

The submission encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments and notes these measures provide a cost effective and sustainable means of managing storm water, controlling water pollution and at keeping surface water out of combined sewers. The submission encourages the removal of storm water from combined sewers as part of development and advises the discharge of storm water to combined sewers is not permitted. The submission welcomes the promotion of nature based sustainable urban drainage measures in the LAP and advises that Uisce Eireann are happy to engage and collaborate on projects that remove surface water from combined sewers.

- **Planned Roads and Public Realm Projects**

The submission notes that planned public realm and road projects have the potential to impact on Uisce Éireann assets and that such development must be undertaken in accordance with Uisce Eireann Standard Details and Codes of Practice. The submission recommends early engagement on such projects to ensure public water services are

protected to enable UÉ to plan works accordingly and ultimately minimise disruption to the public.

- **Zoning**

The submission notes that network extensions may be required to service some zoned sites and 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. Network upgrades or extensions are to be developer driven unless there are committee Uisce Eireann projects in place.

In order to maximise the use of existing infrastructure the submission recommends phased sequential development in areas with existing water services infrastructure and spare capacity and preclusion of discharge of surface waters to combined sewers.

The submission notes that all new development will be assessed on a case by case basis through UE's New Connections Process and that new connections are subject to UE's Connections Charging policy.

The submission notes that third party agreement will be required where it is proposed to service a new development via private property and that this may apply to a number of residential sites in the northwest area of the town which may require access to services on Golden Grove Road via 3rd party lands and to Employment Site 3.

The submission notes that UE assets run through Residential Sites 38 and 39 (as identified in the Serviced Land Assessment) and where UE assets are within a development site, they require protection or diversion.

The submission notes future development of lands around the Roscrea WWTP must take account of the established use of the plant, potential for impacts on sensitive receptors (Odour, Noise) and potential for extension or intensification of the WWTP. The submission highlights the proximity of Residential Site 24 (as identified in the Serviced Land Assessment) to the Roscrea WWTP in this regard.

The submission highlights the provisions of the on Draft Water Services Guidelines for Planning Authorities (Jan 2018) regarding zoning and development of lands with no public water services infrastructure.

- **Water Services and Constraints**

The submission notes sufficient water supply capacity to cater for the population targets identified to 2029 and that local network upgrades may need to be delivered to provide capacity to individual sites.

The submission notes there is potential spare capacity in the Roscrea WWTP to cater for the projected growth within the lifetime of the plan. The WWTP is currently not compliant with its license limits but can achieve Urban Wastewater Treatment Directive standards.

Uisce Éireann and Tipperary County Council are continually progressing leakage reduction activities, water main and sewer rehabilitation activities and maintenance activities.

- **Other Comments**

- The submission suggests wording changes to Section 1.4.3 *Infrastructure and Services* of the LAP.

- Regarding the Town Centre Strategy, the preparation of masterplans for proposed developments are supported by UE. Consideration should to be given to how sites will be serviced and how UE infrastructure will be impacted through Masterplan preparation.

- The submission recommends footnote 26 (Section 8.2.2) be amended where the date of March 2022 is changed to June 2022 to reflect the date of publication of the latest Wastewater Capacity Register.

- References to Irish Water throughout the Plan to be changed to Uisce Eireann

Consideration

For clarity the considerations are presented under the sub-headings as they appear in the foregoing submissions section:

Sustainable Drainage and Green-Blue Infrastructure

The recommendations of Uisce Eireann regarding management of surface waters and the discharge of same to foul sewers is noted and are accounted for under Section 8.3 of the Draft LAP. The comments in the submission regarding the promotion of nature based sustainable urban drainage measures is acknowledged, as is the offer from UE to engage and collaborate on projects that remove surface water from combined sewers.

Planned Roads and public Realm Projects

The requirement for early engagement with UE in advance of planning public realm and road projects that have potential to impact on UE assets and disrupt services is noted. This requirement can be addressed at project level.

Zoning

The points made regarding the possible requirement for network extensions and localised service upgrades to service some zoned sites are noted as are the recommendations for phased sequential development. Section 8.2.2 of the Draft LAP notes the requirement for service upgrades to the wastewater network. Policy 6.4 of the Draft LAP supports the sequential development of land.

The requirement for 3rd party agreement to service new residential development at the northwest of the town and to employment site 3 is noted, as is the requirement to protect/divert UE assets that run through residential sites 38 and 39.

Objective 8A of the Draft LAP supports capital maintenance activities and rehabilitation works to the water and sewer services in Roscrea and the zoning allocation of Draft LAP has been considered in this regard. Residential Site 24 is zoned Existing Residential which allows (in principle) for new infill residential development. In order to protect the strategic importance of the Roscrea Wastewater Treatment Plant and protect the amenity of future residents a statement can be included under Section 8.2.2 of the Draft LAP that addresses the points made by UE and a new Policy added to Section 8.6.

The point that all new development will be assessed through UE's New Connections Process and that new connections are subject to UE's Connections Charging policy is noted.

The land zoning for new residential and employment uses presented in the Draft LAP has been informed by a Serviced Land Assessment (SLA) that has considered (inter alia) the availability and capacity of water and wastewater services. Only lands that are serviced or serviceable have been zoned for development over the lifetime of the LAP. This approach is in line with the Draft Water Services Guidelines for Planning Authorities (Jan 2018).

Water Services and Constraints

The availability of sufficient water supply capacity and potential spare wastewater capacity to cater for the projected growth within the lifetime of the Draft LAP is welcomed. It is acknowledged that local network upgrades may be required and that same may be developer driven. It is further acknowledged that ongoing mains rehabilitation, leakage reduction and removal of surface water from the foul network should serve to improve service capacity.

Other Comments

- The recommended wording changes to Section 1.4.3 *Infrastructure and Services* of the Draft LAP can be included as an amendment.
- The requirement for servicing of sites / lands and dealing with existing UE infrastructure can be included as a key requirement for development of zoned lands and individual sites and in the preparation of masterplans. Section 8.2 can be expanded to address this requirement.
- The recommendation to change the date from March 2022 to June 2022 under footnote 26 to reflect the date of publication of the latest Wastewater Capacity Register can be incorporated as an amendment.
- References to Irish Water throughout the Plan can be changed to Uisce Eireann.

Recommendation

It is recommended that the following amendments to the Draft LAP are made:

1. Additional paragraph added under Section 8.2.2 and additional Policy to Section 8.6 to protect the strategic importance of the Roscrea WWTP (See amendment 21 and 25 in Part 2).
2. Revision to text of Section 1.4.3 (See amendment 5 in Part 2).
3. Additional text to Section 8.2 to incorporate requirements for servicing sites/land and accommodating UE infrastructure (See amendment 19 in Part 2).
4. Update LAP text to replace references to IW with UE & change date from March 2022 to June 2022 under footnote 26. (See amendments 13, 19, 20, 21, 22, 23, 25, 26, 30,31 and 41 in Part 2).

Submission	Submission Name:
Number: 6	Department of Environment, Climate and Communications (DECC)

Submission Summary

The submission requests that the following are taken into consideration in developing the Roscrea LAP:

- i) Climate Action- The Local Area Plan should be drafted in a manner consistent with the latest National Climate Action Plan, CAP 2023, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).

ii) District Heating- The submission recommends the LAP should consider the National Planning Framework, which encourages compact growth to facilitate the development of low carbon district heating and recommends that the LAP emphasise the potential of local renewable energy sources in the context of low carbon district heating. The following are to be taken into consideration:

- National Planning Framework: ‘District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland’s GHG emissions’.
- Regional Policy Objective 105: “It is an objective to support development of district heating schemes by promoting innovation in the use of recoverable heat sources and related technologies. The development of new low carbon heat sources should include non-fossil fuel heat sources including clean electric and renewable gas heat technologies in the Region”

The submission recommends that consideration is given to development of district heating using suitable waste heat sources where available, technically feasible and cost effective.

iii) Built Environment and Heating

The submission recommends the LAP include policies that support the electrification of heating and retrofitting.

iv) Renewable Energy- The submission recommends the LAP further elaborate on the role of domestic scale renewables within the local area, in particular, the role of self-consumers and appropriately scaled renewable developments/projects.

The submission notes the Local Authority should have regard to the updated renewable energy targets and the CAP 2023 when developing renewable energy projects within the Local Area when drafting the Local Area Plan.

v) Waste- The submission recommends that the Local Authority consult with their Regional Waste Management Planning Office regarding development plans that include waste policies.

Regarding the foregoing the submission:

- notes and supports the LAP’s integration of sustainable modes of transport, promotion of active travel and public transport (Planning and Development Policy 6.1, Planning and Development Objective 6A).

- notes and supports the Policy 5.1 which supports the concept of compact growth.
- Welcomes the support of the transition to renewable energy for heating (Section 8.1 Energy Demand and Renewable Energy), and the objective to identify and use local renewable energy sources (Planning and Development Objective 5A)
- notes that the Draft LAP does envisage that local renewable energy systems such as district heating will become a feature of towns such as Roscrea with support under the national Climate Action Plan and is cognisant of opportunities for communities to access support with mapping their energy demands and potential energy resources (Section 5,1 Roscrea Low-Carbon and Sustainable Energy Community)
- welcomes the policy of the Local Authority which requires new development to incorporate best practice in low-carbon and energy efficient planning and techniques (Local Planning and Development Policy 2.2).
- notes objectives of the Local Authority which supports local communities to identify and implement measures and actions to reduce energy consumption, produce renewable energy from local resources and to adapt to a changing climate (Local Planning and Development Objective 2-A)
- notes the support and encouragement of the use of renewable energy technologies in residential, commercial and community developments is noted and supported (Planning and Development Policy 8.3)
- Welcomes the support to the reduction in the production of waste in the local area, in line with the principles of the WAP (Planning and Development Objective 8C)

The submission advises that Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of the Environment, Climate and Communications relevant to the preparation of this plan.

Consideration

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, as are the measures incorporated under the Draft LAP to support climate action. The spatial planning measures included in the Draft LAP will support the achievement of the renewable energy targets in the CAP.

ii) 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 Roscrea. The Draft LAP contains a number of objectives to support the transition to renewable energy generated

locally (Section 8.1 and Policy 8.3), to identify and use local renewable energy sources (Development Objective 5A) and to produce renewable energy from local resources and adapt to climate change (Objective 2A). It is considered the Draft LAP contains sufficient reference to and emphasis on the potential of local renewable energy resources to meet energy demands and adequate reference is made to the potential for district heating.

iii) Built Environment and Heating – Policy 8.3 of the Draft LAP seeks to permit and encourage the use of renewable energy technologies in residential, commercial and community developments. Section 8.1 of the Draft LAP references support to energy efficiency upgrading of built fabric throughout the town. It is considered that Policy 8.3, Section 8.1 and the above referenced objectives address the recommendations of the DECC with regard to built environment and heating.

iv) Renewable Energy - In order to address the recommendation of the DECC it is recommended that Section 8.1 of the Draft LAP is amended to include direct reference to the use of domestic scale renewables and self-consumers, in addition a new Policy to be included to support the domestic scale renewables. It is also recommended that Policy 8.3 is amended to require that renewable energy technology is incorporated into new development (where feasible) particularly for high energy users.

v) Waste - The waste management objectives contained in the Draft LAP (Section 8.4) are consistent with Tipperary County Development Plan 2022 (Section 10.8). There is no statutory requirement to consult with a Regional Waste Management Planning Office as part of the preparation of a LAP.

The acknowledgment and support in the submission of the policies and objections contained in the Draft LAP that promote compact growth, sustainable transportation, active travel, renewable energy, reduced energy consumption, climate adaption and waste reduction are welcomed.

Recommendation

It is recommended that the following amendments to the Draft LAP are made:

1. Amendment to Section 8.1 and Policy 8-3 to incorporate recommendations of DECC regarding renewable energy (See amendment 18 and 25 in Part 2).
2. Add new policy to Section 8.6 to support domestic scale renewables. (See alterations 25 in Part 2).

Submission Number: 8	Submission Name: Department of Education
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Submission Summary

The submission advises that there are 6 schools (four primary and one post-primary, one special) located in Roscrea town with the Department's preference to expand these existing facilities (if possible) should there be a requirement for additional school places as a result of the planned population increase as envisaged under the LAP.

The submission requests the Planning Authority examine the potential of protecting a land buffer around each of the schools as outlined in Table 5.1 of the Draft LAP to enable them to expand further if required to meet future population growth.

The submission states the provisions of Section 5.4 *Education and Learning* of the LAP reflects the current position in relation to future requirements and welcomes that the Draft LAP had applied an appropriate zoning to enable and protect future school expansion.

The submission notes / supports the following policies, objections and sections of the Draft LAP:

- Section 5.8 Policy and Objectives, Objectives 5B, 5C, 5F
- Table 9.1, Land use Zoning Objectives as it relates to educational facilities.
- Appendix 2, Section 3.1, Table 5.2 & Section 2.3.3 as it relates to school place demand, school zones and safe routes to school.

The submission requests that the figures for projected school place demand are reviewed on foot of Census 2022 population figures and that consideration is given to unforeseen circumstances that place undue pressure on school place provision. The submission notes that additional Special Education Need provision at both Primary and Post Primary level will be required throughout the country in the future which will result in schools requiring additional accommodation and that the Department will consult with the Council when additional accommodation is required.

The submission welcomes continued engagement with the Council regarding development of new and existing schools.

Consideration

The Department's preference that demand for additional school places arising from the growth as envisaged under the LAP is accommodated by expansion of existing school facilities is noted. The Draft LAP has applied an appropriate zoning to lands on and surrounding the schools within the LAP area to enable future school expansion should the demand for same arise. This zoning will

accommodate expansion to meet demand arising from envisaged population growth and growth from unforeseen circumstances, should the latter arise.

The figures for projected school place demand are based on the level of growth set down under the Core Strategy for Roscrea under the Tipperary County Development Plan 2022. The entire Census 2022 figures are not yet publicly available. Same are scheduled for release toward the end of May 2023. A review of same will not alter the projected growth strategy for Roscrea.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 9

Submission Name:

Health Service Executive

Submission Summary

The submission notes that lands zoned Social and Public under the current Roscrea LAP are now zoned “Community Service and infrastructure” and that a “Retirement/ Nursing Home” is not permitted under this land use zone. This use is open for consideration under the Social and Public use zone.

The submission requests that Retirement/Nursing home use is classed as Open for Consideration to allow provision for Community Nursing Unit infrastructure and notes that a replacement Community Nursing Unit may be required on HSE lands as part of the Healthcare Strategy for Roscrea.

The submission cites disappointment that lands to the rear of Creagh House have not been considered for Community Service and infrastructure zoning to accommodate future expansion. The submission requests the zoning is expanded to include adjoining lands to the rear of Creagh house to support future development of the site.

Consideration

Table 9.2, Zoning Matrix of the Draft LAP identifies the land use of retirement/nursing homes are not normally permitted on lands zoned for Community Services and Infrastructure (CSI). This presents a conflict with the description of the land use zoning objective, which is to provide for and protect civic, religious, community, health care and social infrastructure. In order to address this issue, it is proposed to amend Table 9.2, Zoning Matrix to change retirement/nursing homes to ‘Open for Consideration’ on lands zoned for Community Services and Infrastructure.

The lands to the rear (west) of Creagh house are located outside the Draft LAP boundary and therefore cannot be zoned under the LAP. The expansion of healthcare facilities outside the LAP boundary will be assessed against the relevant policies, objectives and standards contained in the TCDP.

The Draft LAP has zoned lands to the north of the Creagh House site for Community Service and Infrastructure that will allow for appropriate expansion of HSE facilities. See map below. This land is zoned Existing Residential use under the current Roscrea LAP.



Recommendation

It is recommended that the following amendment to the Draft LAP is made:

1. Table 9.2: Zoning Matrix amended to change Retirement/Nursing Homes from ‘Not Normally Permitted’ to ‘Open for Consideration’ (See amendment 27 in Part 2).

Submission Number: 13

Submission Name:

Electricity Supply Board

Submission Summary

The points made in the submission by ESB are summarised as follows:

- i) The ESB Depot at Ayr Hill, Roscrea is required to support the delivery by ESB of capital works programmes and operational activities. 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 Roscrea and its environs. ESB supports the retention of the Community Services and Infrastructure Land-Use Zoning Objective on its lands at Ayr Hill, Roscrea. This zoning is

compatible with established land uses in this part of the town and proposed future uses on this site.

ii) In the context of the LAP objective of sustainable energy network planning within the Draft LAP area, ESB welcome opportunities to future proof delivery of electricity infrastructure through greater collaboration between ESB and Local Authorities. In this regard early engagement at design stage of key public infrastructure projects, such as the Gantly Street Master Plan, offer opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services.

iii) ESB support the ambition of the Draft Plan to deliver an overarching land use strategy for the proper planning and sustainable development of Roscrea.

Consideration

The points made in the submission are noted.

The **Community Services and Infrastructure** zoned for the ESB lands at Ayr Hill, Roscrea will be maintained.

The requirement for early engagement with ESB regarding public infrastructure projects that will be undertaken within the LAP area is acknowledged. This requirement can be addressed at early stages of project design.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 1

Submission Name:

Dublin Airport Authority (DAA)

Submission Summary

The submission confirms that DAA have no comments to make on the Draft LAP. The submission recommends consultation with the Irish Aviation Authority (IAA) and the Irish Aviation Authority Air Navigation Services Provider (IAA-ANSP).

Consideration

The submission raises no issues with or commentary on the Draft LAP.

The Draft LAP does not contain any proposals, policies, objectives or standards that would endanger or interfere with the safety of, or the safe and efficient navigation of aircraft. Roscrea is not located in close proximity to any licenced airports, aerodromes or airfields.

The Irish Aviation Authority (IAA) and the Irish Aviation Authority Air Navigation Services Provider (IAA-ANSP) are not statutory consultees for the purposes of making a LAP.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 12**Submission Name:**

Breandan O Conchuir, Treacy Cré Cumann, Sinn Féin
Roscrea

Submission Summary

The submission makes the following points:

Housing:

The submission cites the current housing supply situation in Roscrea, lack of rental property and number of applicants on the social housing list and considers the housing unit target of 315 units as the bare minimum needed to maintain the status quo in the housing market. The submission requests the Draft LAP should provide for enough housing for all current and predicted future social housing applicants including those on HAP rentals during the plan lifetime.

The submission recommends:

- A social housing strategy to reduce not only the housing list but also the number of people in HAP accommodation, in order to reduce pressure in the private rental sector
- A more robust inspection regime to ensure private rentals meet the minimum standards set out in legislation.

Affordable Housing:

The submission cites the issues with housing affordability and notes that 40% of the population in Roscrea live in either disadvantaged or very disadvantaged areas according to the CSO. The submission recommends the LAP includes for:

- Provision of serviced sites for development of affordable homes.
- Collaborate with affordable housing providers to provide avenues to home ownership for those excluded by current house prices.

Economic Development:

The submission cites the high levels of deprivation in Roscrea, concerns with wages not keeping pace with the cost of living, the need for good paying jobs and changes in employment levels due to automation. The submission recommends:

- Tipperary County Council to develop a community wealth building strategy for Roscrea to tackle deprivation and deliver sustainable economic development.
- Ensure economic development favours higher wage employers to address the persistent deprivation in the town
- Audit the wages of current employers in the town to identify sectors best suited to provide living wage employment
- Develop a community wealth building strategy for Roscrea
- Carry out an audit of the risk posed by automation to existing industries in Roscrea, and develop a strategy to replace all jobs likely to be lost to automation

Refugee and asylum seeker accommodation:

The submission highlights the need for increases in funding for services and social supports with increases in protected persons. The submission also raises concerns with the standard of refugee and asylum seeker accommodation and outlines the following recommendations:

- That the Council takes a more active role in community engagement to ensure the best possible outcome for asylum seekers and the wider community.
- That asylum seeker voices be listened to in decisions concerning them.
- That the council lobby the government for increased funding for services to ensure the best possible outcome for asylum seekers and the wider community.
- The development of a county wide strategy for housing asylum seekers developed in partnership with key stakeholders.

Active travel:

The submission welcomes the attention to active travel and considers the development of the town should focus on reducing the need for car use within the town centre.

War of independence and civil war heritage:

The submission considers the Council should work with the OPW to promote Roscrea Castle history and allow for public commemorations of this history.

Consideration

For clarity the points made in the submission will be considered under the sub-headings outlined in the following sections:

Housing:

The Tipperary County Development Plan 2022 (TCDP) sets out a framework for the development of Tipperary's towns and villages in line with the National Planning Framework 2018 (NPF) and Southern Regional Spatial and Economic Strategy 2020 (RSES). Roscrea is identified as a District Town under the TCDP and growth levels in population and housing are applied under the Draft LAP in line with its District Town designation.

The Draft LAP contains sufficient zoned land to cater for an additional 847 persons over 2016 populations levels. This equates to a requirement for 315 additional housing units. The LAP must remain in line with the Core Strategy and associated growth allocation provisions of the TCDP. It would not therefore be consistent with the TCDP to provide zoning for additional lands for new residential development beyond the lands already identified for future development.

The recommendations in the submission to prepare a social housing strategy to reduce numbers on the social housing list and in HAP accommodation and for an inspection regime for private rentals are noted. A Housing Strategy has been prepared for Tipperary and same is contained as an Appendix to the Tipperary County Development Plan 2022 (TCDP), the Housing Strategy has informed the core strategy of the TCDP and growth strategy for Roscrea. The Housing Strategy contains objectives to address social housing needs.

The recommendation to develop an inspection regime for private rentals is beyond the scope of the LAP.

Affordable housing:

The points made regarding the need for affordable housing are noted. The Draft LAP references (under section 2.4.2) the Tipperary County Housing Strategy which notes the affordability constraint in Roscrea and the need for smaller units (1 and 2 bed units) to be provided to meet the specific affordable demand. The zoning contained in the Draft LAP allows for consideration of proposals for serviced sites should such proposals come forward.

The recommendation to collaborate with affordable housing providers to provide avenues to home ownership is a matter for the Council's Housing section.

Economic Development:

The recommendations made in the submission regarding economic development are outside the scope and function of the LAP. The LAP is a local level policy document that sets out a spatial planning framework for Roscrea. Under the Draft LAP a significant amount of land has been zoned for employment use with the objective to provide, improve and encourage general enterprise, business development and employment activity, including start up enterprises and tourism. In addition, the lands zoned Urban Core and Regeneration allows for development of commercial uses (in line with the Draft LAP zoning matrix).

Refugee and asylum seeker accommodation:

The recommendations made in the submission regarding refugee and asylum seeker accommodation are outside the scope and function of the LAP.

Active travel:

The points made regarding the active travel provisions of the Draft LAP are noted and welcomed.

War of independence and civil war heritage:

The Draft LAP contains a policy (Policy 7.2) to safeguard and enhance the setting of Roscrea Castle. The promotion of the Castle as per the recommendations of the submission are outside the function of the LAP.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 10

Submission Name:

Ray and Deirdre McCarthy

Submission Summary

The submission raises concern with the speed of traffic on the Birr Road, notes one fatality occurred on this road and raises concern with the location of the proposed by pass at the town boundary and 100km speed limit. In order to deal with traffic speed on the Birr Rd the submission considers the bypass location should be brought further out the Birr Road (to the west) with a suggested location at the by road to the Cistercian College.

Consideration

The points raised regarding the speed of traffic on the Birr Rd (N62) are noted. The section of the Birr Road that comes within the Draft LAP boundary is subject to a speed limit of 60 km/hr. The 60km speed limit extends (east) for a distance of 0.4km where it reduces to 50km/hr. Amendments to traffic speeds limits are not within the scope of consideration for the LAP, within the terms of the Planning Act.

The 100km speed limit commences approx. 70 metres west of the entrance to the Sheehane estate. The lands west of the 100km speed limit point do not come within the Draft LAP boundary and objectives to examine traffic calming measures on same cannot therefore be included in the Draft LAP.

Relocation of the indicative relief route corridor to the location suggested (at the by-road to the Cistercian College) cannot be included in the Draft LAP, as it relates to lands outside the LAP boundary. The relief road corridor identified on Map 1 of the Draft LAP occupies the same route identified under the current Roscrea Local Area Plan 2012. It should be noted that this is an indicative route and further assessment at project level is required to determine the most appropriate route for this objective to provide connectivity from the M7 to the N62 without the need for through traffic to travel through the town centre.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 11**Submission Name:**

Judy Colclough

Submission Summary

The submission requests that any bypass of the town is not located in the middle of a recognised residential area. The submission cites safety issues with the existing N62 arising from the speed and volume of traffic that currently use the road and considers that locating a bypass at the location proposed would be detrimental to safety.

Consideration

See response to submission No.10 from Ray and Deirdre McCarthy.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 14

Submission Name:

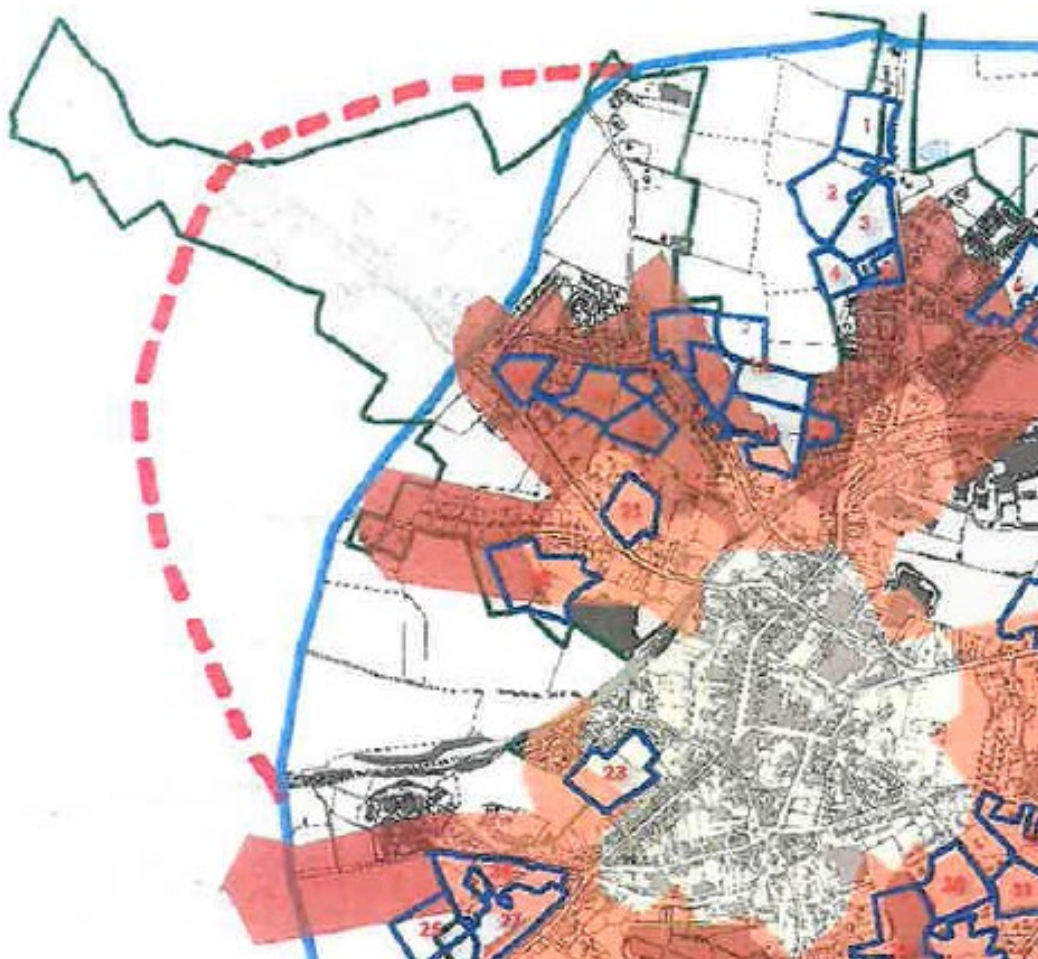
Coulter Architects for Rory Costigan

Submission Summary

2 submissions were received from Coulter Architects for Rory Costigan. The first submission was received on 30/3/2023 and the second on 11/4/2023.

The submission dated 30/3/2023 identifies lands owned at Loughnavatta, Roscrea, Co. Tipperary that are currently zoned Agricultural under the Draft LAP. The submission requests the lands zoning is changed to residential to provide for the future expansion of Roscrea. The lands in question have an approximate area of 22.5 ha and the submission outlines a number of points to consider in support of zoning the lands for residential.

The submission dated 11/4/2023 recommends the relief road corridor is moved further to the west out of town (suggested route marked in red on map below).

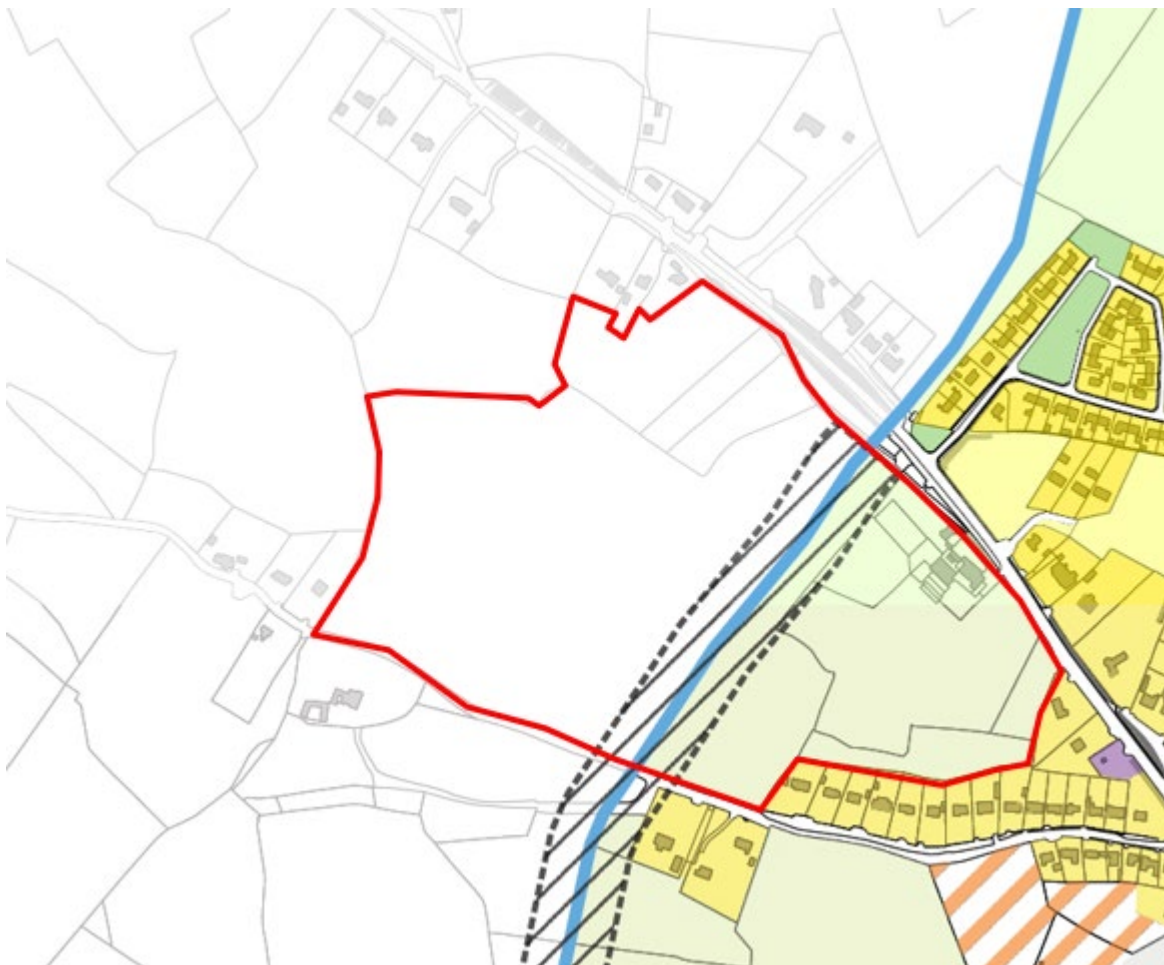


The submission considers the suggested route location would allow residents using the stretch of the N62 within the settlement boundary to travel into town without the need to cross the proposed relief road. The submission cites the problem of the N62 Roscrea to Templemore Rd where heavy traffic volumes use said road in conjunction with a densely populated area there by creating an unfavourable environment for pedestrians, cyclists and children travelling to school.

The submission considers the relief route, if developed at the proposed location may impact on the water table, and notes that when the N62 was developed on the west side of Roscrea in the past the water table was encountered at 15 feet and a natural pond was drained and never recovered.

Consideration

The lands identified on the maps provided with the submission dated 30/3/2023 (outlined in red on map below) shows the lands are part within the Draft LAP boundary. The extent of lands within the Draft LAP boundary are zoned Town Environs with the lands west of the LAP boundary falling under the Tipperary County Development Plan 2022 with no land use zoning. The indicative route corridor for the western relief road runs through the lands.



The zoning of land under the Draft LAP was informed by a Serviced Land Assessment (SLA) developed in line with a methodology for such assessments as set down under the National Planning Framework (NPF). This process considered (inter alia) the population targets for Roscrea as identified under the Tipperary County Development Plan 2022 (TCDP) and the availability of serviced lands and infrastructure in the context of the overall LAP vision of achieving compact growth.

Having regard to the foregoing the lands to which the submission relates that come within the LAP boundary are considered appropriate to be zoned Town Environs at this time. Development of the lands west of the Roscrea LAP boundary will be subject to the policies, objectives and standards contained under the Tipperary County Development Plan 2022.

Regarding the submission dated 11/4/2023 the relief road corridor identified on Map 1 of the Draft LAP occupies the same route identified under the current Roscrea Local Area Plan 2012. The route corridor is indicative only and further consideration on this point is outlined in Submission No.10 above.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 16

Submission Name:

Charles Lamb, Karibu Timoney, Roscrea

Submission Summary

The points made in the submission relate to the renewable energy, the circular economy, bio-gas and electricity generation and cites the potential for bio-gas production through an Anaerobic Digester (AD) using surplus from meat production at the abattoirs in Roscrea. The submission also notes the significant potential for synergy between the AD plant and local industries, schools and public buildings through providing heat and a gas supply. The linkage is illustrated on a map that accompanies the submission.

Consideration

The Draft LAP contains objectives to support the transition to renewable energy generated locally (Policy 8.1) and to support the sustainable management of waste in line with the National Waste Management Plan for a Circular Economy (2022) (Section 8.4). The Tipperary County

Development Plan 2022 also contains policies and objectives (Section 10.8-10.9) to support energy generation from local renewable sources and applying the circular economy principles to waste management.

The particular suggestion to develop an AD enterprise and to develop synergy with other industries and users in Roscrea is acknowledged. The Draft LAP includes for significant area of lands zoned for Employment use that could accommodate such a proposal in principle, as well as objectives which support the development of sustainable energy generation in principle. The principle of district heating is also acknowledged and supported under the Draft LAP.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 17

Submission Name:

Dominic and Denis Sharpe

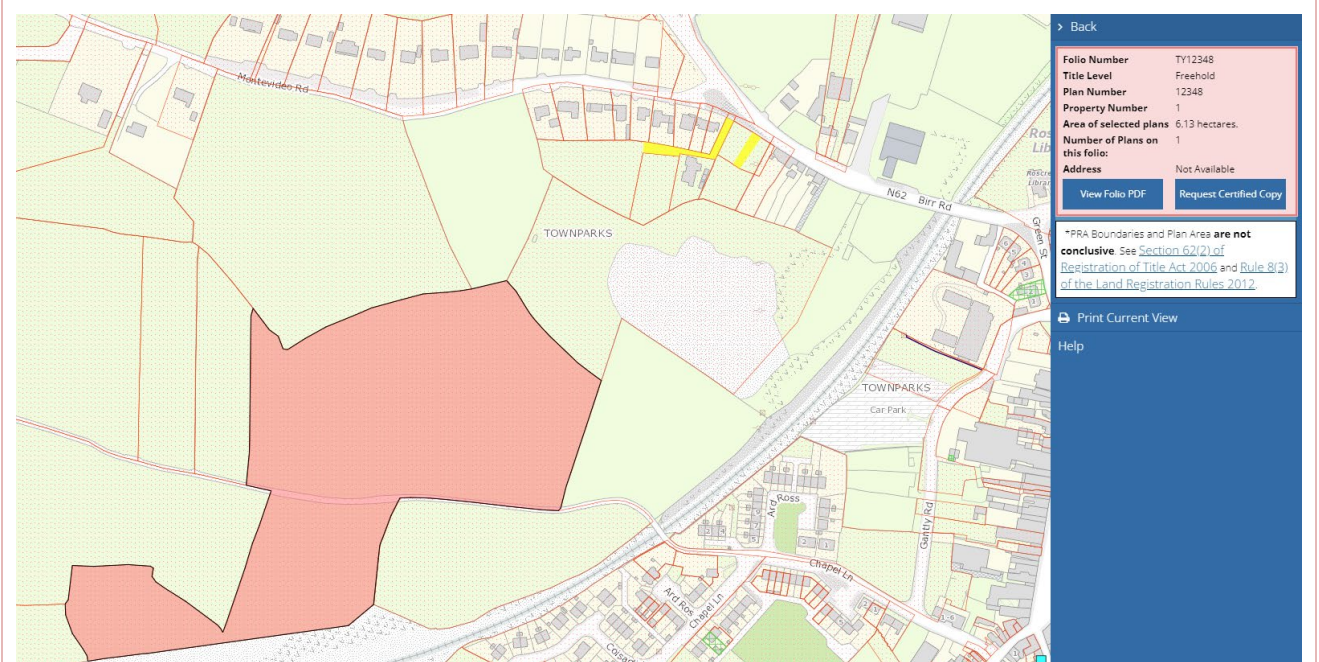
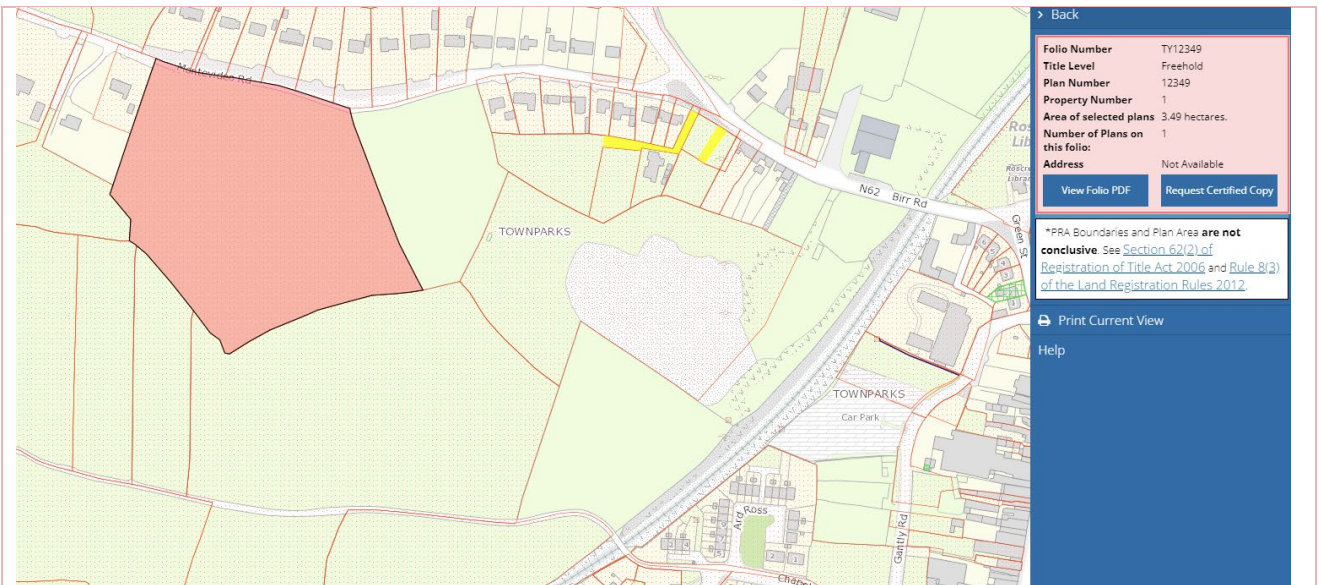
Submission Summary

The submission outlines the interest of the landowners in ensuring services to their lands that are located west of the railway between Chapel Lane and Montevideo Road. The submission considers that designating some lands Strategic Reserve would contribute to and support this initiative.

The submission requests that the zoning is changed on a portion of the lands from Montevideo Road to Chapel Lane along a natural contour, that would aid the development of a gravity-fed services.

Consideration:

The submission does not include a map identifying the lands. A search on www.landdiect.ie shows lands in folios TY12348 and TY12349 (see maps bellow) as owned by Denis Sharpe.



The above lands are zoned Town Environs under the Draft LAP. The zoning of land under the Draft LAP was informed by a Serviced Land Assessment (SLA) developed in line with a methodology for such assessments as set down under the National Planning Framework (NPF). This process considered (inter alia) the population targets for Roscrea as identified under the Tipperary County Development Plan 2022 (TCDP) and the availability of serviced lands and infrastructure in the context of the overall LAP vision of achieving compact growth.

Having regard to the foregoing the lands to which the submission relates are considered appropriate to be zoned Town Environs at this time. Should the lands be considered for zoning for development under a future Plan the matter of servicing can be considered at that time.

Recommendation

No alterations recommended to the Draft LAP.

Submission Number: 19**Submission Name:**

Michael Madden & Denis Madden

Submission Summary

The submission welcomes the Draft LAP and notes the focus in same on developing town centre opportunity sites which will reduce sprawl and long travel distances between homes and local services.

The submission highlights problems presented by the rail line in allowing for the natural expansion of the town to the west and considers this needs to be addressed to better allow the town core to develop. The submission particularly references the lands between Birr Road and Chapel Lane, referred variously as Tulla Hill, the Swallow Banks, Townparks and Disused Sandpit lands.

The submission highlights Regeneration Site No. 5 and welcomes the designation and encourages the adoption of this aspect of the plan. The submission also highlights the lands zoned Strategic Reserve at Montevideo Road and welcomes the designation.

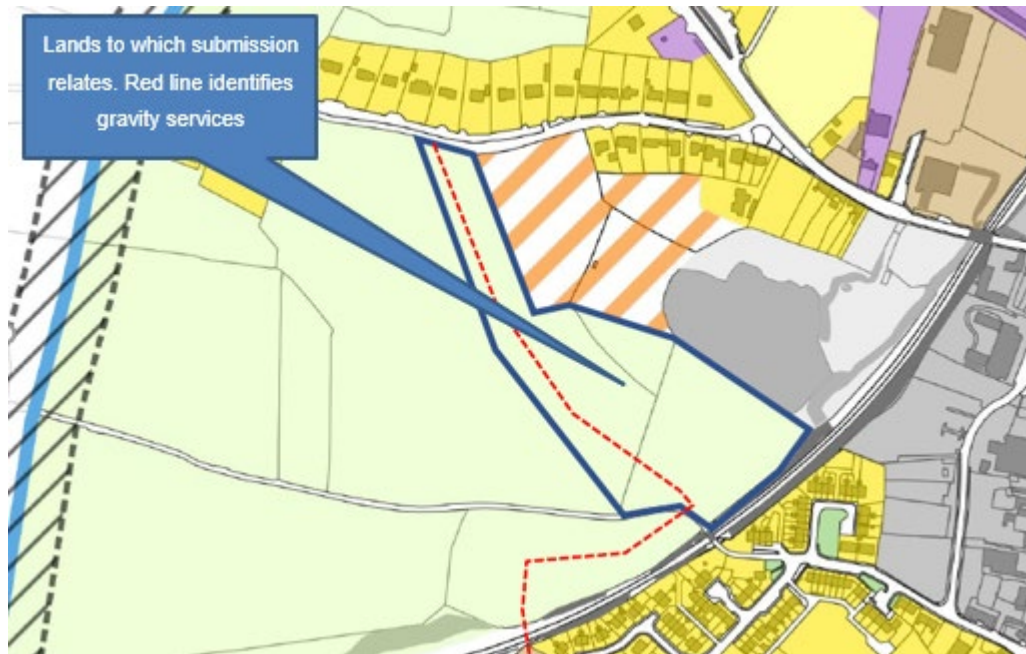
The submission states that the provision of services is critical to unlocking the development potential of the both land areas.

The submission considers the lands designated Strategic Reserve should be extended (west and south west) to follow topographical lines (and not just ownership boundaries) as this would facilitate development of the lands and allow for a gravity fed service system to be installed extending from Montevideo Road, Chapel Lane and connecting with infrastructure on Regeneration Site 5.

The submission includes a map showing a possible location for gravity fed services through the lands and outlines the land area to be zoned Strategic Reserve. The submission includes an extract drawing from an Engineering Report prepared by Michael Punch and Partners showing gravity services extending through lands southwest of Regeneration Site 5.

Consideration

The positive comments contained in the submission on the Draft LAP are acknowledged, as are the comments regarding the Regeneration and Strategic Reserve zonings on lands west of the rail line and south of the N62. The request to extend the Strategic Reserve zoning to lands to the west and south west onto lands zoned Town Environs under the Draft LAP is also noted.



As outlined in the consideration to submission no. 17 the zoning of land under the Draft LAP was informed by a Serviced Land Assessment (SLA) developed in line with a methodology for such assessments as set down under the National Planning Framework (NPF). This process considered (inter alia) the population targets for Roscrea as identified under the Tipperary County Development Plan 2022 (TCDP) and the availability of serviced lands and infrastructure in the context of the overall LAP vision of achieving compact growth. Having regard to the foregoing the lands to which the submission relates are considered appropriate to be zoned Town Environs at this time.

The land area zoned Regeneration is identified under Appendix 3 of the Draft LAP as a Regeneration Site (Site 5, Birr Road). The planning criteria for the site requires that a masterplan is prepared for the site that includes for pedestrian linkage with the lands zoned Strategic Reserve to the west. In order to address the servicing of the adjoining Strategic Reserve lands it is recommend that an objective is added to the *key planning criteria* for Regeneration Site 5-Birr Road that servicing of the adjoining Strategic Reserve lands be considered in the masterplan.

Recommendation

It is recommended that the following amendment is made to the Draft LAP:

1. An additional bullet point to be added to the Key Planning Criteria under 5. Birr Road, Appendix 3 (See amendment 41 in Part 2).