



Comhairle Contae Thiobraid Árann  
Tipperary County Council

# Chief Executive Report

Draft Thurles & Environs  
Local Area Plan 2024 - 2030

Tipperary County Council Planning Policy and Projects Unit  
September 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 Thurles on 28 July 2023 with the publication of a Section 20 notice and the Draft LAP. Once the new LAP is made and has effect, it will replace the Thurles and Environs Development Plan 2009 (as varied).

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

### 1.2 Format of the Report

The report is set out over two parts:

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

### 1.3 Legislative Background and Requirements

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

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

### 1.4 Public Consultation

Section 20 of the Act sets out the requirements for local authorities in undertaking public consultation. As outlined above, the Draft LAP was available to view and make observations on from 28 July 2023 to 11 September 2023. In addition to the statutory requirements, and to further make statutory bodies, residents, businesses and the local community aware of the Draft LAP, the following was undertaken:

- A public consultation drop-in event was held on Tuesday 29 August 2023 at Thurles Library.
- The Public Participation Network (PPN) circulated details of the process to their members;
- Targeted letters were sent to local community groups;
- A dedicated webpage was published on the Tipperary County Council consultation portal;

- Regular updates and reminders were posted on the Council’s social media pages;
- Posters were erected at various locations in the town;
- Articles on the Draft LAP consultation were published in the local press.

## **1.5 Submissions to the Draft LAP**

27 submissions were received with 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.

## **1.6 Environmental Assessment and Strategic Flood Risk Assessment**

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

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

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

## **1.7 Next Steps**

This report is now submitted to the Elected Members of the Council for their consideration. A workshop will be held with the Elected Members of the Thurles Municipal District on Monday, 18 October 2023 to facilitate consideration of this report and recommendations contained therein. The matter will be brought before the Elected Members at the Plenary Meeting on 27 October 2023.

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

## 2.0 List of Submissions Received

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

No.	Name	Submission Type
23.	Office of the Planning Regulator (OPR)	<b>Statutory Consultees, State Bodies and other Government Departments</b>
15.	Southern Regional Assembly (SRA)	
25.	National Transport Authority (NTA)	
6.	Transport Infrastructure Ireland (TII)	
8.	Department of Transport (DoT)	
14.	Office of Public Works (OPW)	
1.	Environmental Protection Agency (EPA)	
16.	Uisce Eireann (UE)	
13.	Department of Environment Climate and Communications	
10.	Department of Education (DoE)	
17.	Electricity Supply Board (ESB)	
27.	Department of Housing, Local Government and Heritage	
7.	Tipperary Energy Agency (Shane Egan)	
11.	Active Retirement (Bridget O'Dea)	
18.	Tipperary Heartlands Tourism Group	
2.	Gearóid Fitzgibbon, SEAI Sustainable Energy Community Mentor	<b>Individual Submissions</b>
3.	Natasha Tuohy	
4.	Ursula Paine	
5.	Melvin Brennan	
19.	Paul Brophy	

<b>20.</b>	Dan Harty	
<b>9.</b>	An Post	<b>Zoning Related Submissions</b>
<b>12.</b>	Robert O'Meara	
<b>22.</b>	Gavin Cronin (Deanscastle Developments Ltd.)	
<b>24.</b>	Donal ad Eleanor Commins	
<b>26.</b>	David and Ann Commins	
<b>21.</b>	Kieran Healy	<b>Submissions relating to the draft Local Transport Plan</b>

## 3.0 Summary and Consideration of Submissions

### 3.1 Statutory Consultees, State Bodies and Government Departments

<b>Submission Number: 23.</b>	<b>Submission Name:</b> Office of the Planning Regulator (OPR)
<b>Submission Summary</b>	
<p>The submission outlines the OPR's function in the assessment of statutory plans under the Planning and Development Act having regard to the TCDP, RSES and Section 28 Guidelines. Recommendations therein relate to clear breaches of policy and S28 guidelines and observations relate to a request for further information, clarity or justification of particular provisions.</p> <p>The OPR considers the Draft LAP to be generally consistent with overarching regional policies and to have been undertaken collaboratively and with a clear emphasis on town centre regeneration.</p> <p>Four recommendations and two observations were identified in the submission under the following headings.</p>	

## 1. Consistency with development plan core strategy, residential zoning and compact growth.

The submission notes that the proposed land use zonings for residential development exceed the TCDP core strategy housing target for Thurles, due to historic zoning provisions, but that in general terms, the draft LAP provides a reasonable approach to ensure a sufficient supply of zoned land with the exception of the following peripherally located sites:

- **Site 3 (3.26 ha – T1) and Site 4 (2.24 ha – T1):** these sites are located in a peripheral location to the north of the town. They are not located within the compact growth area, do not accord with the principle of sequential development and consolidating the existing built pattern, nor are they within a 5 to 10 minute or 10 to 15 minute walking distance of the town centre. There are also foul sewer constraints.
- **Site 5 (4.57 ha – T1) and Site 6 (3.33 ha – T1):** these constitute backland sites to the rear of existing ribbon development along the N62. The SLA details that neither site is served by cycle infrastructure or considered as contributing to compact growth or the sequential approach.
- **Site 25 (3.22 ha – T1):** this site is located in a peripheral location to the east of the town. It is detailed that the lands are not located within the compact growth area, do not accord with the principle of sequential development and consolidate the existing built pattern, nor are they within a 5 to 10 minute or 10 to 15 minute walking distance of the town centre. The lands are not served by cycle infrastructure.

Further anomalies between the zoning map and SLA were noted:

- **Site 8 (8.93 ha):** it is identified as meeting the compact growth criteria on the SLA table, it however, appears to be located outside the compact growth area.
- **Site 17 (1.06 ha):** it is identified in the SLA table as a New Residential site. It is however, zoned 'Existing Residential' on the Zoning Map.
- **Site 24 (0.71 ha):** the boundary identified as a New Residential area on the SLA Map 1 does not reflect the extent of land zoned 'New Residential' on the zoning map.
- **Site 28 (0.21 ha):** it is identified as a New Residential site on the SLA table and that it is to re-zoned to 'Existing Residential'. It however, is zoned Urban Core on the zoning map.
- **Site 30 (0.67 ha):** it is identified as a New Residential site on the SLA and that it to be re-zoned Strategic Reserve. It is however, identified as a New Residential zoning on the zoning map.

Furthermore, there are a number of smaller peripheral sites zoned Existing Residential in the Environs which are of concern including isolated dwellings to the north of the town. It is considered that this approach undermines the principles of compact growth and sequential development and raises unreasonable expectations about the potential for further one-off housing and subdivision of sites outside the built-up urban area. It also undermines the policy for one off housing in the environs.

### **Recommendation 1 – Residential Zoning Objectives**

**The planning authority is required to:**

- 1. Delete the New Residential zoning objective for sites 3, 4, 5, 6 and 25. Consideration should be given to amending the zoning to either or amend the zoning objective to either Strategic Reserve or Town Environs;**
- 2. Amend the Existing Residential zoning objectives on lands associated with the isolated pockets of rural dwellings predominately located to the peripheries of the LAP boundary to Town Environs to ensure consistency with the approach to one off housing in the town set out in section 5.3.2 and Policy 5.2 of the draft LAP; and**
- 3. Review the SLA Table 1 and Map in Appendix 1 of the draft LAP, the zoning map and written statement to ensure consistency and accuracy, particularly with regard to sites 8, 17, 24, 28 and 30.**

## **2. Economic Development and Employment**

The Office welcomes the strong emphasis on enterprise and employment in the draft LAP. The quantum of zoned employment land is generally considered appropriate having regard to regional objectives and the population growth anticipated for the town. However, the Office has a concern regarding one of the sites:

- **Site 1 (4.78ha):** this site is located to the east of town adjacent to existing playing fields. It is detailed in the SLA that the site has a number of infrastructural deficits including no public lighting or foul sewer. The site is not served by a cycle lane. Having regard to the extent of land zoned for employment use in the town, including the proposed extensions to the existing Cabragh Business Park and the additional area of over 11 ha on the N62, it is considered that adequate justification has not been provided to support this zoning at this location.

It is also noted that there are some anomalies and discrepancies between the SLA table and the zoning map.

- **Site 2 (2.46 ha):** it is stated on the SLA table that this site is to be zoned for Employment It is however, identified as a Mixed Use zoning on the zoning map.
- **Site 3 (2.56 ha):** it is stated in the SLA table that this site is to be zoned 'Residential'. It is however, indicated as both Residential and Community Services and Infrastructure on the zoning map.
- **Sites 4 (1.2 ha) and Site 5 (0.8 ha):** it is stated that both of these sites are to be zoned Town Environs due to their location within and proximate to the flood zone. Both sites remain zoned Employment on the zoning map, with only part zoned Town Environs.

It is also noted that there is one undeveloped employment site to the R498 (south of Intreo Centre) that has not been included in the SLA. It is unclear whether this site contributes to the 58.24 ha of undeveloped employment lands or whether it is in addition. The planning authority are required to include all undeveloped employments zoned lands are assessed in the SLA. The SLA should be used to inform the revised land use zonings for the town. Where lands are not serviced or serviceable within the plan period they should not be zoned.

### **Recommendation 2 – Employment Zoning Objectives**

The planning authority is required to:

- 1. Delete the Employment zoning objective for site 1. Consideration should be given to amending the zoning objective to Town Environs;**



- 2. Review the SLA Table 2 in Appendix 1 of the draft LAP, the zoning map and Chapter 4 of the Written Statement to ensure consistency, particularly with regard to sites 2, 3, 4,5 and 12; and**
- 3. Review the Serviced Land Assessment to include all undeveloped employment zoned lands in the draft LAP area. Where lands are not serviced or serviceable within the plan period they should not be zoned for employment development.**

### **3. Flood Risk Management**

The Office welcomes the preparation of a SFRA to inform the draft LAP. However, the SFRA has been informed by incorrect mapping which underestimates the extent of the flood zones affecting the town due to the following errors:

- The flood zones indicated on the flood zone maps have excluded areas benefitting from flood defences from the flood zone contrary to section 2.25 of the Flood Guidelines that the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity. The likelihood and extent of this residual risk, therefore, needs to be considered; and
- The 1% AEP extents for the National Indicative Fluvial Mapping Programme have not been used to inform the flood zone mapping, i.e. Flood Zone A. This means that lands in the town at most risk for flooding are not included in the flood maps.

#### **Recommendation 3 – Flood Risk Management**

The planning authority is required to:

- 1. Review and update the Strategic Flood Risk Assessment to ensure that the flood zone mapping estimates the full extent of potential flood risk and excludes the presence of flood defences in accordance with the guidance set out in section 2.25 of the guidelines. Clarity should also be provided in the SFRA regarding residual risk for lands that are considered to benefit from existing defences;**
- 2. Review and update the Strategic Flood Risk Assessment to ensure that the 1% AEP extents are used to inform the flood zone mapping, i.e. Flood Zone A;**
- 3. Review the methodology and approach included in the SFRA to ensure that justification tests are completed for all land zonings that overlap with flood zones and to ensure that such tests are only carried out when avoidance and substitution of the of the flood risk is not possible. In particular, the justification test for Regeneration Site 3 – Kavanagh Place should be reviewed to demonstrated that the site complies with all of the criteria set out in the plan making justification test; and**
- 4. Ensure that overlays of land use zoning and National CFRAM potential future scenario mapping are included in the SFRA.**

Consequent to the above, the planning authority is required to omit or amend zonings that do not meet the Justification Test in accordance with the provisions of the aforementioned Guidelines. The planning authority should consult with the Office of Public Works regarding this

recommendation.

#### **4. Transport and Mobility**

The Office welcomes the preparation of the LTP, further consideration should be given to the integration and synergy between the LAP and the LTP, together with a clearer policy approach to provide more explicit support to the proposed interventions. Clear policies should be prepared to ensure compliance with the LTP interventions and mapping of said interventions should be included.

##### **Recommendation 4 – Local Transport Plan**

The planning authority is required to:

- 1. Include specific actions in the written statement of the Local Area Plan with respect to the key actions identified in the Local Transport Plan for Thurles in order to clearly outline the guiding principles for improved permeability and sustainable land use and transportation management for Thurles and to ensure that a cohesive land use strategy for the town is clearly set out.**

Indicative route corridors for the Inner Relief Road and Thurles Bypass should be included in the Draft LAP mapping.

##### **Observation 1 – Transport and Mobility**

The planning authority is requested to:

- 1. Include on the land use zoning map the indicative route alignment of the proposed Thurles Inner Relief Road and the Thurles Bypass.**

#### **5. Implementation and Monitoring**

The draft LAP includes proposals for monitoring and evaluation in chapter 10 in accordance with the TCDP. The draft LAP does not provide any tangible indicators for monitoring the objectives of the LAP, just a broad statement of intent aligned with a generalised approach in the Development Plan. It is considered that a more bespoke approach, specific to the LAP, should be adopted.

##### **Observation 2 – Implementation and Monitoring**

The planning authority is advised to:

- 1. Include a clear implementation and infrastructural delivery schedule in the LAP to ensure that the implementation of the policy objectives of the local area plan will take place and to ensure that development progress is consistent with the core strategy of the Development Plan.**

#### **6. General and Procedural Matters**

In respect of more minor matters, the Office draws attention to the following: Greater clarity could be provided on the land use zoning map regarding the colour tones used to distinguish between sites zoned for Mixed Use, Amenity, Open Space and Recreation and Town Environs. The colour tones used to identify these zonings may give rise to confusion in identifying the specific land use objective(s).

#### **Consideration**

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

- 1. Consistency with development plan core strategy, residential zoning and compact growth.**

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

- **Site 3 (3.26 ha – T1) and Site 4 (2.24 ha – T1):** While these sites are located to the north of the town, they are adjacent to an existing large residential development on Brittas Road both north and south of Jimmy Doyle Road. While these sites are currently un-serviced this area of Thurles is considered to be the most serviceable in terms of wastewater which is problematic to the east of the town. The sites are in close proximity to TUS third level campus and thought to be a suitable location to meet student accommodation needs. The Jimmy Doyle Road is serviced with footpaths and cycle lanes and further sustainable transport infrastructure measures have been proposed in the LTP linking these sites with the town centre. The landowners of the subject sites have made a submission (no. 12) to the draft LAP stating that they wished to retain the residential zoning and to extend it to encompass lands to the north and south of the existing parcel. These sites are considered necessary to provide for the projected population increases and future development of Thurles.
- **Site 5 (4.57 ha – T1) and Site 6 (3.33 ha – T1):** These sites are adjacent to existing residential development. While site 5 mainly represents backland development to the rear of ribbon development, site 6 is mainly bounded by the road. Site 6 is in close proximity to footpaths and cycle lanes on Jimmy Doyle Road and further sustainable transport infrastructure measures have been proposed in the LTP linking these sites with the town centre. The site, particularly site 6, has good access to water and wastewater services. Section 4.4.1 of the Development Plans- Guidelines for Planning Authorities (DHLGH, 2022) state *that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning.*
- Engagement with Uisce Éireann and the Thurles MD Engineers have indicated that lands to the east of the Suir are constrained in terms of the sewer network with the Drainage Area Plan showing a potential for flooding of existing residential sewers should development progress in many locations. The area north of Liberty Square has yet to be the focus of more consolidated residential development already executed in the south and east of the town. The area to the north is thought to be most appropriate in terms of balanced development and in terms of its serviceability. A number of the LTP interventions are focused in this area to align with the proposed residential growth.
- **Site 25 (3.22 ha – T1):** The peripheral location of this site is acknowledged. This area of the town is constrained in terms of its sewer network.

Anomalies in the SLA

- **Site 8** – It is noted that Site 8 is outside the compact growth area but that it is marked as within. The SLA states that Site 8 is outside the compact growth area.
- **Site 17** – noted
- **Site 24** – noted
- **Site 28** – noted
- **Site 30** – noted

The point regarding the smaller peripheral sites zoned for Existing Residential purposes is valid and such instances will be amended. Further to this the provisions in the Draft LAP for single dwellings on lands zoned 'Town Environs' are set out in Section 5.2.2 and Policy 5.2 which seeks to. *'Support new dwellings on lands zoned for 'Town Environs' where the applicant meets an 'Economic Need' (see TCDP Table 5.3 and Planning Policy 5 - 11), and there is no availability of alternative sites. An existing and/or shared domestic dwelling entrance of the applicant's family dwelling should be used, where practicable, and it will meet sightline requirements set out in TCDP Volume 3, Appendix 6, Section 6.1 Road Design and Visibility at a Direct Access'.*

Lands within the Draft LAP zoned 'Town Environs' are within the wider area identified as being under the urban influence of Thurles Town (referring to Fig. 5.3 of the TCDP 2022-2028), and associated high demand for one-off houses. Separate but closely related to this 'Areas under Urban Influence' designation, is the important role that the lands within the environs have in the long-term growth of Thurles town. Under the Southern Region's RSES and TCDP 2022-2028, Thurles is designated as a key town. Whilst these lands in the environs are not required for town growth and expansion at present, in due course the town may grow and additional lands may be required, and haphazard development of one-off housing will impact negatively on future use of lands.

For this reason, Section 5.3.2 of the Written Statement and associated Policy 5.2 of the Draft LAP are in response to the need to protect the environs for long-term growth of Thurles town.

It is however understood that the national and regional level planning frameworks support rural communities. Noting specifically NPF Policy Objective NPO15: *'Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.'*

The TCDP seeks to manage the growth of areas that are under strong urban influence to avoid over-development while sustaining vibrant rural communities by way of Policies 5-11, 5-12 and 5-13. It is reasonable therefore to introduce social need under the qualifying criteria for one-off houses within the environs of Thurles town to allow limited social need qualification including long term landownership and medical circumstances.

In line with NPF Policy Objective NPO15, and taking account of Thurles' designation as a key town, it is considered justifiable to limit the social need whilst continuing to accommodate those persons with a rural focused economic need. It is considered that the amended policy, outlined in the recommendation below, will allow for a strengthening of the rural communities in the environs of Thurles without impacting on the future growth of the town.

## **2. Economic Development and Employment**

The point made regarding the quantum of zoned employment land being generally considered appropriate having regard to the strategic objectives of the RSES and the population growth anticipated for the town is welcomed.

- **Site 1 (4.78ha):** The peripheral nature of the site and its associated infrastructural deficits are acknowledged.

Anomalies in the SLA

- **Site 2:** Noted
- **Site 3:** Noted
- **Sites 4 & 5:** Noted
- Site to the south of the Intreo has not been included in SLA, land is to be rezoned for Amenity purposes. Land for employment purposes to be changed to Site 15 on Residential SLA.

## **3. Flood Risk Management**

The points regarding the use of incorrect mapping to inform the identified flood zoned is acknowledged and amendments will be actioned.

## **4. Transport and Mobility**

It is noted that further consideration should be given to the interaction between the LAP and LTP. A number of specific policies and objectives supporting the LTP interventions will be inserted in the draft LAP. A map will be included separately showing the indicative alignment of the Inner Relief Road and the By-Pass interventions.

## **5. Implementation and Monitoring**

The recommendation for a more tailored approach to providing tangible indicators for monitoring and evaluation of objectives is noted.

## **6. General and Procedural Matters**

The colours used are a national standard in line with Appendix B to the Development Plan Guidelines for Planning Authorities 2022.

## **Recommendation**

### **1. Consistency with development plan core strategy, residential zoning and compact growth.**

- **Sites 3 & 4** – Retain as Residential and extend to encompass further land to the north and south (see amendment 59 relating to submission no. 12).
- **Site 5** – Rezone Strategic Reserve (Amendment 59)
- **Site 6** – Retain as New Residential
- **Site 25** – Rezone Strategic Reserve (Amendment 60)

Anomalies in the SLA

- Update Table 2.5 to show that densities are indicative and not maximum and update figures for New Residential. (Amendment 6)

- Update Section 2.4.3 with updated figure for Strategic Reserve. (Amendment 7)
- Update table 2.6 with updated figures for New Residential and Strategic Reserve. (Amendment 8)
- Amend various pockets of Existing Residential in peripheral sites to Town Environs and zonings associated with adjoining uses. (Amendment 61)
- Amendments to Sites 5, 8, 15, 17, 28 & 30 in the Residential SLA table to ensure consistency in how sites are evaluated (Amendment 40)
- Amend Section 2.2 of SLA with table of updated figures resulting from zoning amendments. (Amendment 42)
- Amend text Section 2.2 of SLA with updated New Residential and Strategic Reserve figures (Amendment 43)
- Amend text in Section 2.4 of SLA with updated Residential and Strategic Reserve figures in text box (Amendment 44)
- Amend Site 24 boundary of Residential SLA Map to capture full extent of zoned land (Amendment 41)
- Amend Section 5.3.2 of the Draft LAP 'One-off Housing in the Town and Town Environs', as follows:

*Single housing units will be facilitated throughout the town on serviced and infill sites and assessed on a case by case basis in line with development management standards. Lands zoned 'Town Environs' are under urban pressure and have an important role in the long-term growth of Thurles. Whilst they are not required for town growth and expansion at present, in due course the town may grow and additional lands may be required.*

*The primary use of these lands shall be agriculture in line with the land use zoning matrix as set out in Chapter 9. ~~In exceptional circumstances, w~~With consideration on a case by case basis, a single house may be permitted ~~for a person with an economic need directly associated with agriculture, where there is no alternative site available,~~ in the limited circumstances outlined under Policy 5.2. (Amendment 13)*

Amend Policy 5.2 of the Draft LAP as follows:

*~~Support~~ Permit new dwellings on lands zoned for 'Town Environs'<sup>1</sup> where the applicant meets (i) an 'Economic Need' (see TCDP Table 5.3 and Planning Policy 5 - 11), and there is no availability of alternative sites, or (ii) a 'Social Need' (see TCDP Table 5.3 and Planning Policy 5 - 11), where the proposed site has been in the ownership of immediate family members for a minimum of 10 years, and there is no availability of alternative sites.*

*An existing and/or shared domestic dwelling entrance of the applicant's family dwelling should be used, where practicable, and it will meet sightline requirements set out in TCDP Volume 3, Appendix 6, Section 6.1 Road Design and Visibility at a Direct Access.'*

Inset the following footnote to the amended Policy 5.3:

*<sup>1</sup> 'Town Environs' are a 'rural area' for the purposes of Policy 5.2 of this Plan and in the context of Table 5.3 and Policy 5-11 of the TCDP. Policies 5-12 (Ribbon Development) and 5-13 (Strategic Regional Roads) of the TCDP will apply to all lands zoned 'Town Environs'. Applicants with exceptional medical*

*circumstances will be considered on a case-by-case basis in accordance with Table 5.3 of the TCDP.*  
(Amendment 18)

## **2. Economic Development and Employment**

- **Site 1 (4.78ha):** Amend zoning to Town Environs (Amendment 62)

Anomalies in the SLA

- **Site 2:** Updated SLA to Mixed Use (Amendment 40)
- **Site 3:** Update SLA table to show that part will remain as CSI (Amendment 40)
- **Sites 4 & 5:** Update SLA table to show that part will be rezoned at TE due to flood risk (Amendment 40)
- Zoning south of Intreo to be rezoned amenity. (Amendment 65)
- Site 15 in Residential SLA to be rezoned for Employment purposes – now site 15 Employment. (Amendment 47 & 63)
- Amend Section 3.2 to update table with amended Employment figure as a result of zoning changes (Amendment 45).
- Amendments to Sites 2, 3, 4, 5, 12 in the Employment SLA table to ensure consistency in how sites are evaluated (Amendment 46)

## **3. Flood Risk Management**

- Add sentence to Section 3.2 regarding planning applications in Regeneration sites (Amendment 12)
- Amend SFRA mapping and text. (Amendments 54-58)
- Amend Section 8.5 with updated flood map (Amendment 34)

## **4. Transport and Mobility**

- New text inserted at end of Section 6.1 Active Travel, Movement and Accessibility re. active travel measures (Amendment 22)
- Amend Policy 6.2 re. active travel (Amendment 28)
- Insert Roads Interventions Map in Section 6.4.2 (Amendment 25)
- Insert new Section 6.3 re. traffic management solutions. (Amendment 23)
- Add new Policy 6.10 supporting the implementation of traffic management solutions (Amendment 29)
- Add Table Demand Management/Supporting Measures to end of Section 6.3 Demand Management (Amendment 24)
- Add new Policy 6.11 supporting the implementation of demand management measures (Amendment 30)
- Add new Section 6.4.2 regarding the relationship between the LTP and the proposed road interventions and associated roads interventions table (Amendment 26)
- Add Roads Interventions Map to Section 6.4.2 (Amendment 21)

## **5. Implementation and Monitoring**

- Monitoring provisions to be incorporated into the LAP (Amendment 39)

**Submission Number:**

**Submission Name:**

Southern Regional Assembly

### **Submission Summary**

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

#### **A. Role of Thurles as a Key Town**

The submission quotes RPO 21 which is the Thurles based objective in the RSES. It advocated for the inclusion of the key aspects of these objectives throughout the DLAP and notes that its key aspects could be strengthened further particularly in chapters 1.0 Introduction and 2.0 Planning and Development Strategy.

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

The submission welcomes the specific Town Centre Strategy chapter. The success of the Council to secure Project Ireland funding is noted. Existing plans such as the Thurles Town Centre Renewal Strategy and the proposed Town Centre First Masterplan will provide more detailed guidance in the development of the town. The submission welcomes the inclusion of Appendix 3: Consolidation and Regeneration Sites also in this regard which aligns with RPO 31 Sustainable Place Framework and RPO 34 Regeneration, Brownfield and Infill Development. The submission notes the importance of developing sites close to or within the town centre.

The submission commends the continued development of public realm and wayfinding projects that prioritise sustainable transport over car-parking such as the Liberty Square and Market Quarter projects. The adoption of the 10-minute town concept for Thurles is also welcomed.

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

The DLAP sets out the requirement for 39.4 ha of serviced/serviceable residential land by 2030 with the quantum of land apportioned to residential zonings being 48.19 in addition to 39.99 Urban Core (with 30% for residential) and 1.02 ha for Regeneration (30% Residential). There is also 20.60 ha dedicated to Strategic Reserve. To ensure consistency with the TCDP the amount of land zoned for residential purposes should be in line with its core strategy. Clarification is sought on this point. This would also ensure alignment with compact growth, sequential development and Town Centre First.

It is noted that a density figure of 25dph is used to all Residential zoned lands including Urban Core and Regeneration. Higher density targets should be considered, particularly on sites close to the town centre or pt routes. The submission notes existing and draft guidelines for sustainable residential



development along with Section 3.9 Placemaking on the RSES which advocate for higher densities in Key Towns.

### **C. Economic Development and Enterprise**

The SRA welcomes the inclusion of policies within the DLAP to promote Thurles as an employment centre and the economic potential of the designation of Lisheen as a National Bioeconomy Campus. The RSES supports the development of the Bioeconomy hub into a significant employment and economic driver. The DLAP also recognises key employment drivers outside and within the town centre recommending that high-density employment should be directed to the town centre in the first instance as well as mixed use and regeneration zonings. In line with TCF approach, it is important that sites close to the town centre are prioritised so that people living in the town can walk, cycle or use public transport to commute.

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

The submission welcomes the preparation of an LTP in accordance with RPO 157 LTPs which notes how LTPs maximise opportunities for integrated land use and transport planning and supports sustainable transport. The Thurles Active Travel Route proposal is welcomed. The submission notes the roads projects outlined in the DLAP which are also set out in the RSES. RPO 167 National Roads Projects also references the N62 Horse and Jockey to Thurles Road to connect with M7 and M8. RPO 168 Investment in Regional and Local Roads supports the Thurles Relief Road and upgrade of the R498 Thurles to Nenagh.

### **E. Climate Action and Sustainability**

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

### **F. Environmental Assessment**

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

The SRA welcomes the public consultation at draft stage for the preparation of a new Local Area Plan for Thurles. Further engagement between the SRA as a key stakeholder and the Forward Planning Section of Tipperary County Council in the final phase of the Local Area Plan is encouraged.

### **Consideration**

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

### **Role of Thurles as a Key Town**

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

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

The positive comments regarding the Draft LAPs town centre strategy are noted and welcomed.

With regards to the quantum of lands zoned for new residential development:

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

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

### **Economic Development and Enterprise Strategy**

The points made regarding the economic development strategy are noted and welcomed.

### **Sustainable Transport and Mobility**

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

### **Climate Action and Sustainability**

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

### **Environmental Assessment**

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

### **Recommendation**

Section 1.4.1. to be amended to include further information on Thurles as a Key Town (Amendment 3)

<b>Submission Number:</b>	<b>Submission Name:</b>
	National Transport Authority (NTA)

### **Submission Summary**

The submission sets out the NTA's comments on the draft LAP and LTP. The NTA is supportive in principle of the approach taken to the LAP and the manner in which an evidence based LTP has been prepared to accompany it. Overall the NTA is of the view that the Draft LAP provides a good basis for the future development of Thurles and have set out a number of recommendations which would serve to strengthen the integrated transport and land-use planning of Thurles.

## **Transport and Connectivity**

The transport and connectivity policies and objectives of the Draft LAP have been informed by the LTP. The NTA would anticipate that the transport related policies and objectives would form a baseline to inform future reviews of the LAP and that future iteration between statutory plans and transport studies would be informed by the monitoring and evaluation of the LAP. In particular, the development of sustainable transport infrastructure and services will allow for future zoning objectives. The role of the LTP in informing transport policies and objectives in order to provide for sustainable development outcomes is not considered to have been adequately executed. The following high level recommendations are made:

- *It is recommended that a greater level of cross referencing between the LAP written statement and the LTP is included in this and other chapters;*
- *In addressing the above recommendation, Chapter 6 would benefit also from the inclusion of greater detail on the proposed measures, with a particular emphasis on tabulated and graphically presented material, providing a clearer basis for the Policies and Objectives presented in Section 6.6;*
- *Chapter 6 in its current form, does not seem to represent the full scope or adequately reflect the process by which the LTP informed the preparation of the LAP. It is recommended that this is addressed in the structure and content of the chapter;*
- *Related to the above point, as currently presented Sections 6.1-6.5 present a high level contextual overview of a number of transport policy areas, followed by the long list of detailed policies and objectives, without clear explanation of how these policies and objectives were derived.*
- *In relation to stated purpose of the LTP as presented in the opening paragraph, it is recommended that this is expanded to refer its role in informing the integration of land use and transport planning. As stated above, the ABTA process is designed to be iterative, with the LAP preparation being informed by and, in turn, informing the development of transport policies and objectives.*

## **Demand Management**

*The NTA would recommend that the LTP and LAP should include a commitment to the development of a town centre Parking Strategy, which would consider the potential for the migration of on-street car parking to sites on the town centre edge. The NTA recommends that a policy regarding the provision of secure, public cycle parking at key destinations should be included in the final LAP and LTP. Such a policy should note that the implementation of cycle parking, particularly if provided as clusters, must take account of Universal Design principles to ensure that it does not discommode disabled pedestrians, wheelchair users, or pedestrians with visual impairments.*

## **Roads Strategy**

The submission acknowledges the constraints associated with the volume of traffic in the town centre, the NTA notes the need for investment in additional road capacity to be justified in terms of reducing dependency on the private car. *It is recommended that greater alignment is established between the roads proposals set out in the LTP/LAP and the goal of managing general vehicular capacity elsewhere, such that there is, at a minimum, no increase in general vehicular car capacity in*

*the LAP area. be justified through a demonstration of the associated sustainable transport benefits.*

*It is also recommended that the LAP should include a policy stating that the implementation of active travel measures is not contingent on the completion of new roads schemes, and that the development of new/improved roads and delivery of active travel measures should happen in parallel.*

An overarching objective of the LTP is the removal of non-local and strategic trips from the town centre. Should through traffic be reduced it is recommended that: *Consideration should be given to for further road space reallocation to sustainable modes and public realm improvements.*

## **Local Transport Plan**

The NTA welcomes the preparation of the LTP with the following observations.

### **Future Demand for Travel**

This section would benefit from an explanation of how and to what extent the land use zoning was influenced by the combined LAP/LTP process. A graphical representation of the population and employment growth distribution used for the purposes of the LTP future scenario would provide clarity on the relationship between land use outcomes and the associated demand for travel.

### **Demand Management and Supporting Measures Options**

The LTP would benefit from further explanation on how the TCDP DM standards can be combined with other demand management interventions and the criteria which would inform same.

### **Active Travel**

#### ***East-West Greenway***

As the greenway is presented as a key measure of the LTP, the importance of year-round functionality, safety and security needs to be emphasised through, for example, passive surveillance and street lighting. The ability to enhance cycling provision on the radial network should also be kept under review.

### **Traffic Management Solutions**

If it is the intention that further details on the provision of off-street parking is to be developed as town centre measures are implemented, it is recommended that specific reference is made to this and that an outline of the process governing this approach is provided.

### **Serviced Land Assessment**

It is recommended that the criteria presented in Table 1 (SLA for lands available for new residential development) are also applied to employment, with explicit reference to the Sustainable Planning Criteria as presented. These criteria are as applicable to land uses 'at trip destination' as they are to land uses 'at trip origin'.

## **Consideration**

### **Transport and Connectivity**

The point regarding the role of the LTP in informing LAP sustainable development policies and objectives not having been adequately executed is accepted.

- The need for greater cross referencing between the LAP and LTP is noted.
- The need for greater detail on the proposed measures from the LTP to be included in the LAP is noted.
- The point regarding the lack of information on the LTP process and how it informed the LAP is acknowledged.

- The point relating to the absence of information on how the transport sections transport policies and objectives were derived is noted.
- The point regarding further detail being required in Section 6 on the LTP and its role informing integrated land use and transport planning.

### Demand Management

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

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

### Roads Strategy

Section 6.5 of the LTP sets out the sustainable transport objectives by which each of the road proposals were assessed. These objectives are aligned with local and national policy in particular the modal and intervention hierarchy set out in NIFTI. As noted by the NTA, the delivery of these schemes through the planning process will need to continue to demonstrate adherence to these sustainable transport objectives, aligned to national climate action policy. It is a recommendation of the LTP that any reduction in through-traffic from the town centre should be used as an opportunity to reallocate road space to sustainable modes and public realm improvements.

The point regarding the inclusion of a policy stating that active travel interventions are not contingent on the completion of new roads is acknowledged.

### Future Demand for Travel

In relation to the graphical representation of population and employment growth, the zoning maps in the LAP document (and also illustrated in the LTP) show the available lands which may be developed over the course of the LAP. The LTP provides a multi-modal access strategy for the development of all zoned lands. It is not considered necessary to provide a further graphical representation of population and employment growth with the LAP or LTP.

### Demand Management and Supporting Measures Options

Objective DM7 of the LTP supports the use of existing and potentially new car parks on the periphery of the town centre for Park and Stride facilities, to further enhance and safeguard the economic viability of the town and its sustainable development. As acknowledged within the LTP, the implementation of segregated cycle facilities within the town centre, in addition to public realm proposals, will result in the reallocation of road space and may result in the reduced level of on street parking within the town centre thereby further supporting the park and stride objective

contained within the LTP. It is not considered that an additional parking strategy is required to support the implementation of the LTP.

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

#### Active Travel

The importance of developing the East-West Greenway as an all year round utility is noted. Through the design process, both active and passive surveillance measures and street lighting will be incorporated into the design in-line with best practice guidance to ensure the facility is attractive and safe for all users all year round.

#### Traffic Management Solutions

Whilst the recommendations in relation to a process governing the approach to scale/location of additional off-street parking is noted, it is not feasible at this strategy level to spatially identify specific parking measures. The specific needs resulting from the development of a scheme can only be addressed through further detailed optioneering and design at the project level. Similarly, the mechanism by which this will be delivered can only be addressed on a case by case basis depending on a number of local influencing factors, the implementation strategy for individual schemes and the available funding for their implementation.

#### Serviced Land Assessment

The point regarding the inclusion of sustainable planning criteria in the SLA table is noted, while these criteria are not explicitly shown on the table the walk time analysis carried out in the LTP were used to inform and justify zoning from employment. The principles of compact growth and sequential development are evident in the plan in its advocacy for town centre employment development. Policy 4.1 seeks to support high density employment in the urban core.

#### Other

The NTA submission to the Nenagh LAP notes that there are LTP interventions outside of the LAP boundary that are not captured by the SEA which needs to be noted.

### **Recommendation**

#### Transport and Connectivity

- In relation to the need for greater cross referencing between the LAP and LTP, and for more measures from the LTP to be included in the LAP – (Amendments 20-32)
- Insert new Sections 6.1 & 6.2 detailing the LTP process (Amendment 20)

#### Traffic Management Solutions

- Insert new Section 6.3 Traffic Management Solutions (Amendment 19)
- New Section 6.5 on implementation measures (Amendment 27)

#### Demand Management

- Insert new Policy 6.12 re. bicycle parking (Amendment 31)
- Insert new measures under demand management in Table 6.7 of the LTP to address cycle parking and parking standards (Amendment 52)

#### Roads Strategy

- Insert new text to end of paragraph two in Section 6.1 outlining the delivery process for active travel measures (Amendment 21)

#### Other

- Insert new footnote 2 in section 1.2 to address the scope of the SEA in terms of the LTP (Amendment 2)

**Submission Number: 6**

**Submission Name:**

Transport Infrastructure Ireland (TII)

#### **Submission Summary**

TII acknowledges the work undertaken in preparing the draft LAP and LTP. The M8, to the east of the LAP area is a strategic national road and is included as part of the EU Trans-European Transport Networks (TEN-T). Additionally, the N62 and N75, national secondary roads, within the Local Area Plan area provide important inter and intra-regional access. In accordance with Government policy, policies and objectives included in the Draft LAP are required to maintain the strategic capacity and safety of the network of national roads.

#### **Development Strategy and National Roads**

RSES RPO 140 outlines the requirement to sustainably maintain the existing and future strategic capacity of the national road and rail network. TII welcomes that Section 6.5 of the Draft LAP and related Policy 6.9 reflect the foregoing provisions of official policy and identify the relevant policy, guidance and standards applicable to development proposed in the LAP impacting national roads.

#### **LAP/LTP Integration**

TII supports the preparation of the LTP integrated with the preparation of the LAP including the focus on consolidation and compact growth that underpins the Draft LAP and the supporting Active and Sustainable Transport Measures set out in the Draft LTP. TII particularly welcomes the associated confirmation in Section 3.2 of the Draft LTP, consistent with text outlined in the Draft LAP, that an overarching aim in the development of all LTP measures is the need to safeguard the strategic function, capacity and safety of the existing national road network in the plan area. The submission notes that the Draft LTP includes a number of measures that will impact the national strategic road network.

TII welcomes that Section 6.5 of the Draft LAP development proposals on or affecting national roads shall take account of relevant TII Publications. 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.

In relation to the proposed 30kph reduced town centre speed limit in the LTP, TII welcome the confirmation that TII Guidelines would be followed.

The submission clarifies that the N62 Thurles Bypass Scheme is not a TII funded national road scheme. TII advises that schemes proposed at a local level impacting the national road network shall be progressed in accordance with TII Project Management Guidelines and TII Publications design standards. In addition, where

additional connectivity is proposed to a national road, the Council shall demonstrate compliance with the requirements of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Funding of schemes which are not identified as NDP national road investment commitments is not a matter for TII.

Table 2.1 would benefit from updating to include reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

### **Maintaining the Strategic Capacity and Safety of the National Road Network**

TII requests that the Council give due consideration to reflecting the requirements of Section 3 of the DoECLG Spatial Planning and National Roads Guidelines in the Local Area Plan prior to finalisation, in particular;

- i. TII Publications (Standards) and Road Safety - The Council is requested to reference TII Publications and the requirement for RSA in the Draft LAP relating to development proposals with implications for the national road network.
- ii. Traffic and Transport Assessment (TTA) - The Council is requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the LAP 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. Signage - TII welcomes that Objective 6G of the Draft LAP sets out the objective to control the proliferation of non-road traffic signage on and adjacent to national roads and recommends reference to the DoECLG Guidelines in the Objective in addition to TII's Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011).
- iv. Safeguarding and National Road Drainage Regimes – TII would welcome a new objective to safeguard road drainage regimes: *The capacity and efficiency of the national road network drainage regimes in Tipperary will be safeguarded for national road drainage purposes.*
- v. Renewable Energy and Grid Connection – TII would welcome an objective in relation to proposals for renewable energy grid connections assessing and using alternative routes to the national road network.
- vi. Noise - The Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft LAP.
- vii. Other Matters - In relation to Greenway proposals, consultation with the Councils own internal project and/or design staff is recommended.

### **Consideration**

The points regarding Development Strategy and National Roads within the LAP area are noted. The point regarding the preparation of the LTP are welcomed. It is noted that it remains a requirement that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030.

The points made in the submission that the N62 Thurles Bypass Scheme is not a TII funded national road scheme and that any proposed scheme impacting on the national road network shall be progressed in accordance with TII Project Management Guidelines and TII Publications are noted.



Table 2.1 of the LTP will be updated to include a reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

- i. The requirement for Road Safety Audits are set out in Section 6.3 of the TCDP Development Management Standards which are applicable also to the LAP.
- ii. The requirement for TTAs are set out in Section 6.3 of the TCDP Development Management Standards.
- iii. Objective 6G will be amended to include the DoECLG Guidelines
- iv. Policy 12-8 of the TCDP provides for the safeguarding of national road drainage purposes, these provisions apply to the LAP also.
- v. Renewable Energy Grid Connection policy to be included
- vi. Section 11.8 Noise and Emissions of the TCDP outlines the provisions of the Tipperary Noise Action Plan which has been informed by the Environmental Noise Regulations 2006.

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

### **Recommendation**

- In relation to the need for greater integration between the LAP and LTP, and for more measures from the LTP to be included in the LAP – (Amendments 20-32)
- Amend Appendix 2: Local Transport Plan as follows:  
Table 2.1 of the LTP will be updated to include a reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). (Amendment 50)
- Amend Policy 6G regarding signage (Amendment 32)
- New Policy 8.8 regarding renewable energy grid connections (Amendment 37)
- Insert new demand management intervention in table 6.7 of LTP (Amendment 52)

**Submission Number: 8**

**Submission Name:**

Department of Transport (DoT)

### **Submission Summary**

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

Since the previous LAP there have been important policy developments relevant to accessible, integrated and sustainable public transport which should be reflected in the proposed plan. Sections 3.4: 'Public Realm and Wayfinding', 5.4: 'Open Spaces and Amenities', 5.6: 'Thurles as an Age Friendly and inclusive Town', and section 6.2: 'Public Transport', should include material on UNCRPD, Universal Design, Whole Journey Approach, and to make specific reference to the 'Design Manual for Urban Roads and Streets interim note'.

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

- The “whole of Government” National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities i.e. including for dishing of footpaths to allow accessibility. DoT welcomes Section 5.6 [Thurles] as an Age Friendly Town.
- The UN Convention on the Rights of Persons with Disabilities (UNCRPD) ratified by Ireland in 2018 puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas.
- DMURS Interim advice Note 2020 includes guidance on accessibility – references to DMURS 2019 in the draft LAP should be updated with reference to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.
- To make public transport fully accessible to people with disabilities requires a ‘whole journey approach’. This refers to all elements that constitute a journey. Local Authorities should implement a universal design approach to the built environment’.
- The Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity throughout the country.

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

**Consideration**

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

**Recommendation**

- Insert new paragraph at the end of Section 6.1 regarding the ‘Whole Journey Approach’. (Amendment 17)

**Submission Number: 14**

**Submission Name:**

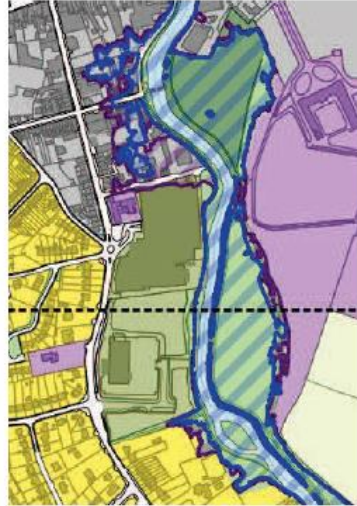
Office of Public Works (OPW)

**Submission Summary**

The OPW welcomes the opportunity to comment on the Draft LAP. The submission relates specifically to flood risk management. The submission particular welcomes the commitment in the Draft LAP to managing flood risk (Policy 8.5) and the provisions of Policy 8.4 and Objective 8B of integrating SuDS and nature-based solutions into development proposals, and Policy 8.7 and Objective 8D in relation to the proposed flood relief scheme for Thurles.

## **Flood Zones**

The submission notes that flood zones are defined ignoring the presence of flood defences and that flood zoned in the draft LAP are underestimated as they have excluded areas benefitting from flood defences. The submission recommends flood zones and zoning be reviewed in this context. TCC will need to update the Flood Zone the Plan-making Justification Test for the Urban Core zoning and in particular Regeneration site 3 – Kavanagh Place. For lands considered to benefit from existing defences TCC should include discussion on the residual risks.



*Zone Mapping*



*National CFRAM PDF Map, showing defended area*

The submission notes that only the 0.1% AEP extents for the National Indicative Fluvial Mapping Programme have been considered when producing the Flood Zones. The 1% AEP extents should also be used to inform the Flood Zone Mapping, i.e. Flood Zone A.

## **Justification Test**

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

## **Town Environs**

The submission welcomes the Note on Land Use Zoning Objectives and Matrix in the Draft LAP and considers same will ensure inappropriate development will not be permitted in zoning such as Town Environs where a Justification Test would not be appropriate.

## **Flood Relief Scheme**

The OPW welcomes Policy 8.7 and Objective 8D to support the proposed flood relief scheme in Thurles. TCC might also consider including a register of other key flood risk infrastructure in the LAP where it would not otherwise be readily identified or protected from interference or removal.

## **Consideration of Climate Change Impacts**

The submission notes that future scenario mapping for the National CFRAM Study has not been overlaid on land use zoning maps. The submission welcomes the climate change considerations of the Draft LAP, in particular Policy 8.5 d). The submission recommends that the SFRA refer to the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019 and the guidance on potential future scenarios contained therein.

## **Nature-based Solutions and SuDS**

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

## **Errata**

The submission recommends that [www.floodinfo.ie](http://www.floodinfo.ie) be referenced instead of [www.cfram.ie](http://www.cfram.ie) in Table 3 of the SFRA.

## **Consideration**

### Flood Zones

It is acknowledged that flood zones are defined ignoring the presence of defences and that the flood zones demonstrated in the LAP are underestimated to exclude areas benefitting from flood defences and that this has implications for the justification tests, particularly Kavanagh Place.

It is noted that notes that only the 0.1% AEP extents for the National Indicative Fluvial Mapping Programme have been considered when producing the Flood Zones when the 1% AEP extents should also be used. Both 1% AEP and 0.1% AEP were used to define Flood Zone B as, following the site visit, the NIFM 1% AEP was considered to be an overestimation.

### Justification Test and Town Environs

The points regarding the plan making justification and Note on Land Use Zoning Objectives are welcome.

### Flood Relief Scheme

The recommendation to include a register of key flood risk infrastructure to be protected is acknowledged.

### Consideration of Climate Change Impacts

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

### Nature-based Solutions and SuDS

The point regarding the provision of further guidance on likely SuDS techniques at identified regeneration sites is notes. It is thought to be more appropriate to develop these measures at project level. As detailed in Section 3.5 "Sustainable Drainage Systems and Surface Water Guidance and Strategy": "Each land use zoning objective allows for a range of possible uses and the Local Area Plan, and associated County Development Plan, allow for a range of scales, heights, densities configurations/layouts and designs. The application of different SuDS techniques will be dependent on a combination of the site's characteristics and the development (when known) being considered."

## **Errata**

The reference to the incorrect website link in Table 3 Predictive Flood Risk Indicators in acknowledged and will be actioned.

## **Recommendation**

### Flood Zones

- Update the Draft LAP SFRA Flood Zone mapping in the Draft LAP and SFRA document. (Amendment 34 & 54)
- Justification Test Table 4 updated (Amendments 57 & 58)
- Amend Policy 8.5 regarding residual risks in defended areas. (Amendment 36)
- Add the following text to Section 2.2 of the SFRA: "A flood wall provides a 1% Annual Exceedance Probability standard of protection to an area to the west of Suir Walk (the Defended Area is mapped at Appendix II). Residual risks remain in this area as, for example, the failure of the wall could occur and/or a severe flood event that exceeds a flood design standard could overtop the wall. Policy 8.5 of the Draft Plan requires that any planning application within Defended Areas shall demonstrate that residual risks have been considered and include measures for their management as appropriate. Furthermore, the Council will contribute towards the protection of the wall from interference or removal (Objective 8D)." (Amendment 55)
- Amend Objective 8D to include to include the protection of flood risk infrastructure. (Amendment 38)
- Amend Policy 8.4 to refer to SFRA (Amendment 35)
- Update the reference in the SFRA to the OPW's website from [www.cfram.ie](http://www.cfram.ie) to [www.floodinfo.ie](http://www.floodinfo.ie) (Amendment 56)
- Update Section 8.6, Objective D (Amendment 33)

**Submission Number: 1**

**Submission Name:**

Environmental Protection Agency (EPA)

### **Submission Summary**

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

The submission advises that the Council ensure the plan aligns with relevant higher-level plans and Programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework (NPF) and Southern Regional Spatial and Economic Strategy (RSES).

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

The submission recommends that:

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

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

### **Consideration**

The points made in the submission are noted.

The 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

A 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: 16**

**Submission Name:**

Uisce Éireann

### **Submission Summary**

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

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

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

### **Planned Road and Public Realm Projects**

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

### **Zoning**

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

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

All new residential, commercial and industrial developments seeking connections will be assessed on a case by case basis which are subject to the Connections Charging Policy.

Third party agreement will be required where new development is to be serviced via private property/private infrastructure. This may apply to a number of residential sites including Residential Sites 12, 17, 18 and 24; and Employment sites 11 and 14.

Existing watermains and sewers (which run through a number of zoned sites) need to be protected. Where assets need to be altered or diverted, a diversion agreement may be required.

Future development of lands close to the WWTP must take account of the established use of the WWTP and potential for expansion of same.

UÉ has a policy to facilitate connections to existing infrastructure where capacity exists, alternative proposals for private wells or treatment plants will generally not be considered.

### **Water Supply Infrastructure**

A new Water Treatment Plant was recently commissioned in Thurles and there is sufficient capacity to cater for the projected growth within the lifetime of the LAP. The submission notes the status of the Draft South East Regional Water Resources Plan, which includes Clonmel, will allow Uisce Éireann to review water supply needs collectively for the entire South East Region. UÉ is carrying out a full network review

and hydraulic modelling to determine if there are any major network constraints and to identify any strategic network upgrades required to provide sufficient capacity in the town out to 2030 and beyond. Currently it is envisaged that capacity is available to cater for the population targets identified to 2030. Local network upgrades may need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded in accordance with the requirements of the Connections Charging Policy.

### **Wastewater Collection and Treatment**

The latest wastewater treatment capacity register, issued in 2023, indicates there is sufficient capacity to cater for the projected growth within the lifetime of the LAP. A Drainage Area Plan, incorporating a Wastewater Infrastructure Plan, has been completed for Thurles, identifying upgrade needs to cater for growth and alleviate hydraulic and environmental constraints. The Thurles Wastewater Network project is currently underway to address environmental compliance issues and flood risk in the Friar Street and Croke Street areas. Local network upgrades would need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded.

### **Other Comments**

UÉ supports the preparation of masterplans for proposed developments, consideration should be given as to how sites will be serviced and the impacts on services.

Suggested amendment to Section 8.2.2 to reflect the status of the Drainage Area Plan and latest capacity register:

*"Uisce Éireann is responsible for the collection, treatment and disposal of public wastewater and has recently completed a Drainage Area Plan (DAP) for the town incorporating a Wastewater Infrastructure Plan for future investment. Based on the latest Uisce Éireann capacity registers, published in June 2023, it was found that there is wastewater treatment capacity available to support the 2030 projected population for Thurles. However, they have indicated....."*

Change reference to Irish Water to Uisce Éireann in Appendix 1 SLA

### **UÉ Capital Investment Plan**

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

### **Consideration**

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

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

The recommendations of Uisce Éireann 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 and Section 15.4 of the TCDP. The comments in the submission regarding the promotion of nature based sustainable urban drainage measures is noted along with the offer from UÉ to engage and collaborate on projects that remove surface water from combined sewers.

### **Planned Road 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 and will be addressed at project level.

### **Zoning**



It is noted that certain zoned sites may require network extensions and that localised network upgrades may also be required. It is also acknowledged that sequential development is encouraged. Section 8.2.2 of the Draft LAP notes the requirement for upgrades wastewater network. Policy 6.4 of the Draft LAP supports the sequential development of land.

It is noted that agreement is required for new connections. Section 3.13 of the TCDP DM Standards (Volume 3) sets out the development management requirement for such. It is also noted that third party agreement will be required where it is proposed to service a development via private property or private water infrastructure.

It is recognised that UÉ assets within development sites are to be protected or diverted with agreement from UÉ.

It is noted that development will be focused in areas that are served by water and wastewater infrastructure and that alternative options for private infrastructure will generally not be considered. UÉs offer to engage further with TCC regarding the serviceability of sites is welcomed.

### **Water Supply Infrastructure**

The point regarding the newly commissioned water treatment plant and its capacity to cater for the projected growth is welcomed as is the development of the Draft South East Regional Water Resources Plan, which includes Thurles.

It is acknowledged that local network upgrades may need to be delivered in some areas to provide capacity to individual sites and that these can be customer driven/funded.

### **Wastewater Collection and Treatment**

It is welcomed that the latest capacity register (2023) indicates that there is sufficient capacity for planned growth. The points made regarding the Drainage Area Plan and Wastewater Infrastructure Plan being completed for Thurles that outline upgrade needs to cater for growth are also welcomed including the project underway to address environmental compliance issues and flood risk in the Friar Street/Cooke Street areas. It is acknowledged that local network upgrades will need to be delivered to provide capacity to certain sites which can be customer driven/funded.

### **Other Comments**

The point made regarding regeneration sites in Section 3.1 of Chapter 3 is captured under Section 8.2 which provides for development proposals for masterplan sites.

The suggested amendment to 8.2.2 is noted and will be actioned.

The suggested amendment to the SLA to change references to Irish Water and noted and will be actioned.

### **Recommendation**

- Amend Section 8.2.2 First paragraph with updated information. (Amendment 33)

### **Serviced Land Assessment**

- 2.3 Methodology- Second paragraph, sixth bullet remove Irish Water and replace with Uisce Éireann (Amendment 48)

- Page 5, footnote - remove Irish Water and replace with Uisce Éireann (Amendment 49)

**Submission Number: 13**

**Submission Name:**

Department of Environment Climate and Communications

### **Submission Summary**

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

- i. Climate Action-The submission welcomes reference to the Climate Action Plan (CAP) 2023 and requests that the LAP is drafted in a manner consistent with the CAP. The submission notes and support the inclusions of actions from the CAP 2023 and TCDP, in particular compact growth and sustainable mobility and sustainable transport measures (Section 2.2) and the support to reduce car dependency and promotion of active travel and public transport (Policy 6.1).
- ii. Renewables- The submission welcomes and supports the transition to renewable energy, in particular Section 8.1 Energy Demand and Renewable Energy and Policy 8.1. The LAP should have regard to updated renewable energy targets under the CAP 2023.
- iii. Built Environment and Heating- The submission notes and supports Policy 2.1 (retrofitting of existing structures), Policy 2.3 (low-carbon and energy efficiency) , Objective 2A (reduce energy consumption, produce renewable energy) and Section 8.1 Energy Demand and Renewable Energy. The submission encourages further consideration with regard to the energy efficiency of existing residential buildings and notes the provisions of the CAP 2023 for electrification of heating under the National Residential Retrofit Plan.
- iv. District Heating- The submission welcomes and supports the compact growth provisions of the Draft LAP (Section 2.4.3 and Policy 3.1) and opportunity from compact growth to develop district heating networks. The submissions notes provisions of the NPF and RSES for the South Region as they relate to district heating. The submission requests more explicit policies in support of district heating are included in the final LAP and encourages the potential of district heating from waste heat to be examined.
- v. Telecommunications-The Draft LAP should support national policy objectives in terms of digitalisation, 5G rollout and enhancing Ireland’s national and international connectivity. The submission requests that ducting inventories be published and a streamlined process to allow for easy connectivity be developed.

Waste and the Circular Economy- The submission welcomes and supports Objective 8E (sustainable management of waste). The submission recommends consultation with the Regional Waste Management Planning Office regarding development of the final LAP. The submission references the provisions of the "*Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects*" and requests that same be incorporated into the policies of the LAP.

## **Consideration**

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

### Climate Action

The Draft LAP has been prepared in a manner consistent with the National Climate Action Plan (CAP). Reference to the alignment between the Draft LAP and the CAP is clearly set out under Section 2.2 of the Draft LAP. The submission notes the Draft LAP includes actions from the CAP.

### Renewable

The points made in the submission regarding renewables is noted, as is the reference to energy targets under the CAP.

### Built Environment and Heating

The points made regarding further consideration with regard to the energy efficiency of existing residential buildings is noted. In this regard an additional line can be added to Objective 2H to reference the electrification of heating under the National Residential Retrofit Plan.

### 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 Thurles. Section 8.1 supports the transition to renewable energy (generated locally) for heating and transport. Policy 8.1 supports the use of renewable energy technologies at appropriate scales and Objective 2A supports measures and actions to reduce energy consumption, produce renewable energy from local resources and to adapt to a changing climate, in accordance with the Tipperary Climate Action Plan 2023 (when complete).

### Telecommunications

Section 5.8 of the Draft LAP sets out the policy context on telecommunications infrastructure. Section 5.8 cross references Policy 6-6 of the TCDP. The content of the Draft LAP regarding Telecommunications is considered adequate.

### Waste and the Circular Economy

The points made regarding Objective 8C are noted and welcomed. There is no statutory requirement to consult with a Regional Waste Management Planning Office as part of the preparation of a LAP. Section 8.4 of the Draft LAP sets out an objective of the Council to support the sustainable management of waste and the reduction in the production of waste in Thurles in line with the National Waste Management Plan for a Circular Economy (Government of Ireland, 2022) and associated guidance across the delivery of its services and in the management of new development. The referenced to associated guidance addresses the submission requirements.

## **Recommendation**

- Amend Objective 2H to reference electrification of heating under the National Residential Retrofit Plan (Amendment 9)

- Amend 5.8 heading to “Digital Connectivity and Telecommunications” (Amendment 17)
- Insert Objective 5K to support and facilitate the provision of telecommunications infrastructure in Thurles (Amendment 19)
- New Objective 2I supporting district heating (Amendment 10)

**Submission Number: 10**

**Submission Name:**

Department of Education (DoE)

**Submission Summary**

The submission notes the TCDP population targets of 2,382 people for Thurles between 2016 and 2031. The Department noted the projected population increase for Thurles in Table 2.2 of the draft LAP which provides for an increase of 2,382 between 2016 and 2031. The Department considered this data and made this submission based on the potential population growth within the town and its environs between 2022 and 2031. The Department has now applied the growth figure of 10,322 to 2031 along with the 2022 Census figure of 8,185 for Thurles in order to determine that the potential projected growth figure for Thurles stands at 2,137.

There are eight schools in Thurles town, the Department’s preference would be to expand these schools should there be a requirement for additional space as a result of population increases and requests that TCC ensures there are adequate land buffers around each of the primary schools in order to allow for expansion.

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

Section 5.5.1 Primary and Secondary Schools states that according to DoE school place requirements are calculated as 11.5% of the population and 25 students per classroom from primary schools and 7.5% of the population for post-primary schools. The submission notes that these criteria are regularly reviewed as a result the primary percentage figure has changed to 10.25% with a pupil ratio of 23:1 for the 2023/24 school year, these figures are subject to further future changes. The Department requests that the text be amended to reflect these changes. The submission notes and welcome that the schools are identified in the LAP and appropriate buffers are applied to facilitate growth. The submission notes and welcome Policy 5.5 and Objective 5F for the continued expansion of existing schools. The submission welcomes Safe Routes to School in Appendix 2 LTP noting that the active travel links are designed to support children to use sustainable transport between schools and residential areas.

The submission notes the SFRA Table 4 Justification Tests Lands associated with Ursaline Secondary School.

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

primary level with the possible need for increased accommodation. The Department welcomes the continued engagement with TCC.

**Consideration**

The growth figure applied by the Department is noted.

The request to allow adequate land buffers around schools to accommodate potential growth has been provided for where possible.

The request for a text change to reflect the changes to the criteria for determining students based on population figures and the student teach ratio is acknowledged and will be actioned.

The points regarding the LTP and SFRA are welcomed.

The point regarding engagement with TCC on potential reviews of school provisions is welcomed.

**Recommendation**

- Amend footnote 10 with up to date DoE calculations for school figures (Amendment 14)
- Amend Policy 5.9 to ensure the continued operation and expansion of established schools in all zonings (Amendment 16)

**Submission Number: 17**

**Submission Name:**

Electricity Supply Board (ESB)

**Submission Summary**

ESB is a landowner and employer in Tipperary with property and infrastructural assets throughout the County serving Thurles and its hinterland. ESB would welcome greater collaboration with TCC at the design stage of key public infrastructure projects e.g., new roads, public realm upgrades, and greenways, offer opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services.

The submission supports the ambition of the Draft Plan to deliver an overarching land use strategy for the proper planning and sustainable development of Thurles.

**Consideration**

The submission is noted and the opportunity to collaborate on the design stage of key infrastructure projects is welcomed.

**Recommendation**

No alterations recommended to the Draft LAP.

**Submission Number: 27**

**Submission Name:**

## **Submission Summary**

The Department welcomes the opportunity to comment on the draft LAP. The Department notes that there are no specific objectives/policies within section 7.3 relating to Thurles's archaeological (including underwater) heritage. The town was founded upon a fording point on the Suir with the river and underwater heritage having its foundations in the transport links and natural resources of the river. The Department notes the absence of archaeological heritage related policies and objectives and requests that the Council considers strengthening as follows:

### **Definition of Archaeology and Archaeological Heritage**

It is important that the LAP is informed by a clear understanding of the nature of archaeology and archaeological heritage and the legislation that underpins them. While both have been described in detail in the SEA it is recommended that a brief statement should be included in Section 7.2 Archaeology:

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

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

*Archaeological heritage occurs in all environments, urban and rural, upland and lowland, grassland, tillage and forestry, inland and coastal, dryland, wetland (including peatlands) and underwater (including watercourses, lakes and the sea). Archaeological heritage may exist in the form of upstanding or visible remains, or as subsurface features with no surface presentation.*

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

### **Legislation relevant to the protection of the archaeological heritage**

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

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

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

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

**Recommended Climate Change Policies and Objectives for Archaeological Heritage**

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

**Consideration**

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

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

**Recommendation**

- Amend Built Heritage Map with the label Recorded Monument in place of National Monument (Amendment 66)
- Include footnote in SEA under Figure 4.15 providing details of archaeology website. (Amendment 53)

## 3.2 Local Bodies / Groups / Organisations

**Submission Number: 7**

**Submission Name:**

Tipperary Energy Agency (Shane Egan)

### Submission Summary

The submission commends the Local Authority on a well thought out draft LAP.

The submission calls for the use of special symbols to highlight energy and climate action related objectives and policies that have derived from engagement with TEA.

To reflect the continued engagement of TEA, to add the following:

#### 2.2 A Climate resilient, Sustainable and Low-Carbon Town.

*Insert to end of paragraph 2: Tipperary County Council will continue to collaborate with the Tipperary energy Agency (TEA), and other relevant energy agencies, to ensure the Local Authority Climate Action Plan, and this Local Area Plan, reflect the ambitions of the National Climate Action Plan.*

To support district heating and centralised biomass boilers/heatpump systems to add the following planning objective:

#### 2.5 Policy Objectives

##### **Amend Objective 2H**

*Continue to collaborate with the Tipperary Energy Agency, and other relevant energy agencies, to develop targeted energy and climate action measures within the geographic area of the local area plan.*

##### **New Objective 2I**

*Support district heating and centralised biomass/biogas boiler/ heatpump systems, whether private/public or mixture of both, via relaxed/no planning and innovative approaches for easements, for plant and piping, in readiness for future projects.*

### Consideration

The use of special symbols denoting climate action objectives is accepted and considered to be a positive addition to the LAP.

The suggested inclusion of a sentence to the end of paragraph 2 in Section 2.2 to ensure that TCC will collaborate with TEA to ensure that the LAP and LACAP reflect the ambitions of the National CAP is accepted and will be actioned.

The recommendation to amend Objective 2h and include a new Objective 2i in order to support district heating and centralised biomass boilers/heatpumps is accepted and will be actioned.

### Recommendation

- Add paragraph of text at the end of Section 1.3 of the Written Statement referencing Climate Symbol to be added to Objectives (Amendment 3)
- Add text to Section 2.2 to acknowledge future engagement with TEA and other agencies (Amendment 5)
- Assign climate symbol to climate related objectives (Amendment 11)



- Amend Objective 2H (Amendment 24)
- New Objective supporting district heating delivery (Amendment 10)

**Submission Number: 11**

**Submission Name:**

Active Retirement (Bridget O’Dea)

**Submission Summary**

Bridget O’Dea has made this submission on behalf of Active Retirement & OPC. It sets out the LAPs failure to account for the ageing population of Thurles. The removal of parking will remove businesses from the town. The existing carparks are not sufficient as it stands. Elderly people are not able to walk long distances or cycle and require parking in the town centre. The proposals for Cathedral Street will impact on the church goers and on tourism in the town. There is insufficient seating around the Square. The Square is not level and has little wheelchair ramps. There is no rural transport serving Loughmore to Thurles.

**Consideration**

Section 5.6 of the Written Statement provides for age friendly development both in residential developments and in public realm projects. This is supported by Policy 5.3 which requires development to be designed in accordance with universal design and age friendly principles and Objective 5G which advocates for the implementation of the Tipperary Age-Friendly Strategy.

The draft LTP measures have been developed at a strategic level in accordance with national and regional policies. As these measures are taken forward to be delivered at a project level, they will undergo further detailed optioneering and design. At this stage, an assessment will be undertaken to determine the impact on parking. The LTP acknowledges the need for parking within the town centre for all age groups to use and aim to protect key locations within the town centre for age-friendly parking.

**Recommendation**

No alterations recommended to the Draft LAP.

**Submission Number: 18**

**Submission Name:**

Tipperary Heartlands Tourism Group

**Submission Summary**

Jane Ryan has made this submission on behalf of the Tipperary Hidden Heartlands Group who are working on a project to develop 200 student accommodation beds in Thurles that will be used as tourist accommodation outside of term time. The amount of overnight tourist beds have decreased with the closure of a number of B&Bs and a hotel. Students are living in houses and flats instead of dedicated student accommodation which could be used for families instead of students and tourists. The building will be a social enterprise with the provision of paid jobs and profits going back into education and tourism in the area. The land could come from

County Council, Church or private land and be developed using capital funding and supports from the government.

**Consideration**

Section 2.4.1 acknowledges the need for an increased supply of student accommodation which is supported by Policy 2F. The zoning matrix also allows for the provision of student accommodation both on and off campus.

**Recommendation**

No alterations recommended to the Draft LAP.

### 3.3 Individual Submissions

**Submission Number: 2**

**Submission Name:**

Gearóid Fitzgibbon, SEAI Sustainable Energy Community Mentor

#### **Submission Summary**

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

The submission notes the following:

In Section 2.3 Framework for Delivery, table 3: funding Programmes, The Climate Action Fund is listed as supporting capacity building. The SEA community believe this is not the case as it stands.

Policy 2.3 is welcomed as is the reference to new housing development being compact and near zero energy rated.

Objective 2G, engaging with Tipperary Energy Agency and other agencies to develop targeted energy and climate action. This measure is welcomed and the submission requests that the local authority goes further and sets targets and develop its own energy initiatives.

Objective 2A, support the community to identify and implement measures and actions in accordance with the Tipperary Climate Action Plan 2023. The submission is concerned that this amounts to asking unpaid volunteers to undertake additional voluntary work and requests that the local authority outline in a specific measurable way it's role in helping communities implement the actions of the Tipperary Climate Action Plan.

5.1 Thurles Low- Carbon and sustainable Energy Community. The submission requests that the Local Area Plan clarifies what support the local authority will provide to local communities to engage in programs such as the SEAI Sustainable Energy Community programme, sectoral adaptation plans and sustainable energy and climate initiatives. The submission also notes that it would be appropriate in this paragraph to mention the SEAI Sustainable Energy Communities mentor and include a weblink for further information.

Objective 5A, the submission requests that specific and measurable indicators are included on what the support for communities will entail and what role the local authority will undertake in local energy planning.

8.1 Energy Demand and Renewable Energy and Policy 8.1 'Support the use of renewable energy technologies ...' the submission notes that details are lacking under this objective, and the objective should include specifics and measurable indicators.

#### **Consideration**

The submission, in general terms, requests further detail or specific on measures that are included within the Draft LAP. It reasonable that specific or measurable

actions are outlined. However, the Draft LAP is fundamentally a spatial land-use plan and it is beyond the scope of the LAP to provide or commit to specific objectives, as this is the role of other local authority plans, including the Local Authority Climate Action Plan. The role of the LAP is to provide strategic direction for future development and provide policy support for this strategic direction in the assessment of new development proposals.

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

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

### **Recommendation**

No alterations recommended to the Draft LAP.

<b>Submission Number: 3</b>	<b>Submission Name:</b> Natasha Tuohy
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### **Submission Summary**

Submission is requesting that cameras be placed on the traffic lights on Slievenamon Road. Cars have been regularly seen driving through red lights. Stop lines approaching lights need to be repainted as cars cross them making it difficult for trucks to turn. The time given to pedestrians to cross the road also needs to be extended to enable safe crossing.

### **Consideration**

The safety concerns raised by the submission are noted. An improvement scheme has been developed for Slievenamon Road, in accordance with TII design standards, which addresses the safety concerns within this submission. This scheme has undergone Part 8 public consultation and received planning approval, and is due to commence works in 2025.

### **Recommendation**

No alterations recommended to the Draft LAP.

<b>Submission Number: 4</b>	<b>Submission Name:</b> Ursula Paine
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### **Submission Summary**

1. Bypass
2. Level all pavements – walkability study – remove bricks
3. Traffic lights/pedestrian cross at; TUS; top of Parnell Street; and Friar Street carpark

4. More lights to top of Slievenamon Road
5. Manage Stradavoher (estate)
6. Restore River Arra – improve walks – clean waters
7. Develop Butler Island as an amenity i.e. canoeing club
8. Bus shelters/signs
9. Increase number of public toilets
- 10.** Invest in a family resource centre in the town

## **Consideration**

### 1) Bypass

The Bypass is a key measure identified in the LAP and has been shown to significantly reduce strategic traffic from the town centre creating a safer environment for pedestrians and cyclists.

### 2,3&4) Pavements, Traffic Lights and Crossings

The points raised in the submission are noted. The measures proposed in the LTP are at a strategic level in accordance with national and regional policies. As the active travel network is delivered throughout the town, this will include pavement improvements, additional crossings and junction upgrades where deemed necessary to provide safe access for pedestrians and cyclists.

### 5) Stradavoher

Noted

### 6) River

Section 7.1.1 outlines the importance of the river and riparian zones in the LAP area which is supported by Policy 7.1 and Objective 7A.

### 7) Butler Island

Objective 4D supports the development of arts and cultural activities including activity based leisure activities to support tourism in Thurles.

### 8) Bus Shelters/Signs

It is a key objective of the LTP to introduce new and upgraded bus stop infrastructure throughout Thurles. This will be examined further as part of the rollout of the NTA's Connecting Ireland Rural Mobility Plan.

### 9) Increased public toilets

Section 5.6 of the Written Statement provides for age friendly development both in residential developments and in public realm projects. This is supported by Policy 5.3 which requires development to be designed in accordance with universal design and age friendly principles and Objective 5G which advocates for the implementation of the Tipperary Age-Friendly Strategy which provides for enhanced public toilet facilities.

### 10) Family resource centre

Policies 6-1, 6-2, 6-3 and 6-5 of the TCDP support and facilitates the provision of community, health and childcare facilities.

**Recommendation**

No alterations recommended to the Draft LAP.

**Submission Number: 5****Submission Name:**

Melvin Brennan

**Submission Summary**

Draft LAPs for Thurles are a waste of time until the Thurles Bypass is delivered. The streets of Thurles are taken over by HGVs on a daily basis and are unsafe for pedestrians and cyclists. People are dying and there are too many near misses.

**Consideration**

Supporting the development of a bypass in Thurles is set out as Policy 6.6 and Objective 6A of the Draft LAP and is a key objective of the Local Transport Plan.

**Recommendation**

No alterations recommended to the Draft LAP

**Submission Number: 19****Submission Name:**

Paul Brophy

**Submission Summary**

1. Roads: The inner relief road should be prioritised, the current situation is untenable. Cycle lanes can be improved in the short term in advance of the delivery of the Active Travel Route from Loughtagalla to Jimmy Doyle Road.
2. Regeneration: Supports need to be offered to property owners to encourage Over the Shop living - not just student accommodation but a mix of all types. This measure can be supported by active travel infrastructure. Digital hubs can be delivered in smaller units in the town. Age friendly design of footpaths and crossings.
3. Environment: Look at international best practice for trees in the urban realm. Good carbon sink. The National Biodiversity plan can be used to inform planning for nature in the public realm. People to be educated on measures taken in the town to promote biodiversity and incentivised to carry out their own projects.
4. Arts and Culture: Local Link to be improved to provide evening, night and weekend services thus improving access to cultural events. More bus stops to be provided. Creative spaces for arts can be combined with commercial and innovation.

**Consideration**

1. Supporting the development of an inner relief road in Thurles is set out as Policy 6.5 and Objective 6B of the Draft LAP and is a key objective of the Local Transport Plan. The Local Transport Plan outlines an implementation strategy which plans to prioritise the delivery of active travel measures in the short term as funding becomes available. It also outlines a more refined list of actions for active travel measures that should be prioritised.
2. Over the shop living arrangements are supported through Objective 7A (f) of the TCDP. The LAP supports high quality digital connectivity and the delivery of a digital hub in Thurles through Objectives 5I and 5J.
3. Section 7.1 Natural Heritage sets out the LAPs priorities in terms of nature based solutions and trees which are supported by Policies 7.1 and 7.7.
4. The Local Transport Plan supports the roll-out of additional public transport services. Tipperary County Council will continue to liaise with TFI and the NTA on the expansion of Local Link Services and the further rollout of the National Transport Authority's Connecting Ireland Rural Mobility Plan which aims to increase transport connectivity for people living in Rural Ireland. Policy 4.4 and Objective 4D supports the development of arts and cultural activities in Thurles.

### **Recommendation**

No alterations recommended to the Draft LAP

**Submission Number: 20**

**Submission Name:**

Dan Harty

### **Submission Summary**

It is vital that plans for a town by-pass are progressed over the lifetime of the plan to remove HGVs from the centre of Thurles making it a safer environment for pedestrians and cyclists and improving traffic flow. The proposed Inner Relief Road would also positively impact traffic flow but must not be passed off as an alternative solution to the by-pass.

Housing provision is a key priority for Thurles. National homeless figures are high and there is a lack of affordable housing provision. The rental market in Thurles is generally at capacity with added affordability issues. There is demand at present for 399 social housing units. The draft plan aims for an increase of 21% of housing stock or 784 units by 2030 to account for a 10% population increase, the submission argues that additional units will be required to facilitate people who are not recorded in the population increase figures:

#### **1. Adults over 18 living with parents**

Census 2023 indicates that 14.6% or 1,195 adults over 18 in the Thurles electoral area are living with parents. This figure will increase over the LAP lifetime and so there is a greater need for these people to be captured in future planning. Census data shows that by 2030 there will be a further 870 people over 18 in Thurles. We need to plan for these young adults progressing into independent life.

## 2. People returning to Thurles & keeping young people here

Many people have emigrated or moved away from Thurles for better job and housing prospects. While not all would wish to return, it is fair to say that a percentage would. Additional housing should be provided to facilitate them. An increase in social and affordable housing would attract people from all over Ireland to return home. Improved housing prospects and the associated employment from construction and associated industries would also seek to retain people intending to emigrate.

## 3. Hidden Homeless

The Simon Community estimate that there could have been up to 290,000 people classified as hidden homeless in 2022 representing 5.5% of the population. This equates to 450 people when applied to Thurles.

The Draft LAP indicated that there will be capacity for 1,512 residential units, with 20.6 ha for Strategic Reserve. The Draft LAP sets out requirement for 784 units meaning there is additional land zoned for 728 units. The submission argues that this is not sufficient and more ambitious targets are required considering; the new CSO data available for adults living at home with parents including people who will become adults within the Plan period; hidden homeless figures; projected population increases; and those on the social housing waiting list (with potential to be some overlap in figures).

Housing Need	Number of units (average 2.7 occupancy rate)
Population Increase	2,117 people 784 units
Social housing waiting list	399 units
Adults living with parents	1,195 people 442 units
Additional adults by 2030	867 people 321 units
Hidden homeless	450 people 166 units
Total	2,112

\*Please note that the figures in the table above will need to be adjusted for accuracy purposes using more detailed local data that was not available for this submission.

*Extracted from Submission*

The submission includes details of possible overlaps and potential inaccuracies with the figures provided.

## Consideration

### Thurles By-pass and inner relief road

Points related to the bypass and inner-relief road are noted. These two new roads have been identified as measures to be progressed to meet the current and future transport and mobility needs of the Thurles LAP area. Supporting the development of a bypass in Thurles is set out as Policy 6.6 and Objective 6A of the Draft LAP and is a key objective of the Local Transport Plan. Supporting the development of an inner relief road in Thurles is set out as Policy 6.5 and Objective 6B of the Draft LAP. Both measures are also objectives of the LTP.

### Housing

The Draft LAP has allowed for an over provision of zoning to facilitate the projected population growth in Thurles over the six-year period of the LAP. There is further flexibility in the 25 unit/ha density allocation particularly in the urban core where higher densities will be encouraged thus allowing for the provision of units in excess of the 784 provided for.



While the data relates to the wider Local Electoral Area of 15,285 people, it is acknowledged that the depth of the housing crisis is a primary concern for the LAP area. The provision of Strategic Reserve allows for the holding of additional land in reserve should the requirement arise.

It is considered that the quantum of land allocated within the zoning framework is sufficient to meet future demand for housing in the LAP area.

### **Recommendation**

No alterations recommended to the Draft LAP

**Submission Number: 9**

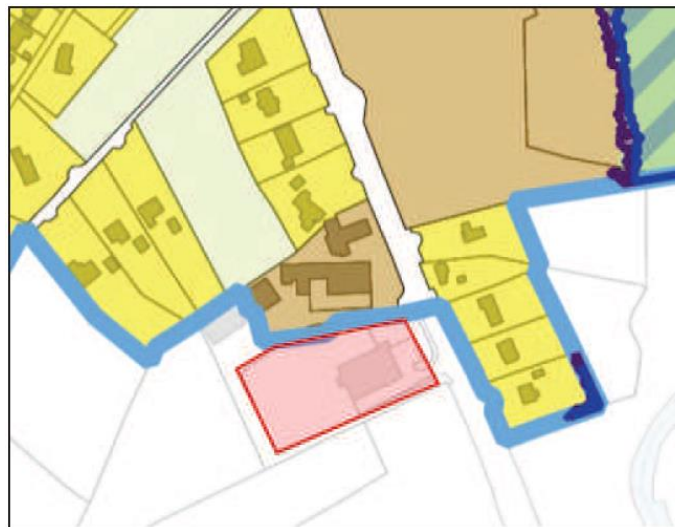
**Submission Name:**

An Post

### **Submission Summary**

This submission was prepared by RMLA Limited on behalf of An Post who welcome the opportunity to make this submission. An Post own a number of facilities throughout the country, a number of whose facilities they will seek to modernise to suit the ever changing postal market. The submission provides background on the nature of An Post and the services it operates within its extensive property portfolio. The submission is being made to set out An Post's current and future requirements to serve the expanding catchment areas and to request that TCC provide a supportive policy framework for the future provision of postal infrastructure.

An Post operate a delivery service unit at Clongower which they may consider for expansion and or redevelopment in the future. The submission seeks the extension of the LAP boundary to encompass the An Post facility (marked below in red) with an associated Employment zoning in order to ensure that the site is subject to the policies and objectives of the LAP.



An Post is supportive of the Thurles Town Centre Regeneration Strategy and the Thurles Local Transport Plan.

The submission states the importance of An Post maintaining access to the town centre and its associated postal facilities on a 24 hour basis with a most particular importance placed on maintaining access in the early mornings and late evenings.

In this regard, any restrictions on delivery times placed upon An Post could have a serious impact on the ability of An Post to meet postal needs. It is requested that this is recognised in the LAP. An Post request that TCC engage with them on any such future proposals. The submission also stresses the importance on maintaining a sufficient level of vehicular access and vehicle loading bays in the town to facilitate operations. It is requested than engagement with An Post is made prior to any future public realm and movement strategies.

The submission also requests that there is flexibility under the land use zonings to accommodate An Post facilities in order to allow growth and development. It is requested that An Post postal facilities (logistics and retail) are permitted in principle or open for consideration across all zoning objectives.

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

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

*\*Note: This use can be assessed on a case by case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan.*

The submission also requests the addition of a number of supportive policies to enhance postal facilities in the town such as:

*"To support An Post in the provision of new postal facilities and the enhancement of existing*

*facilities, including operational requirements, in the Town."*

*"To facilitate the provision of postal infrastructure at suitable locations in the Town."*

*"To promote the integration of appropriate postal facilities, including both post offices and*

*processing, sortation and distribution facilities, within new and existing communities that*

*are appropriate to the size and scale of each settlement."*

The submission also requests that the Authority recognise the operational requirements of An Post in relation to parking, access and deliveries:

An Post facilities require greater levels of parking for delivery vehicles and staff.

Parking standards in the LAP should only apply to visitor and staff parking and not the storage of vehicles associated with the operation of the service. It is, therefore, requested that Tipperary County Council provide flexibility with car parking standards for postal facilities.

## **Consideration**

The LAP boundaries have been set within the mechanism of the TCDP, the request for a boundary change to the LAP area and the associated zoning of the delivery facility in Clongower is not deemed necessary. The facility will be considered as a non-conforming use should any development proposal materialise.

The support for the Town Centre Regeneration Strategy is welcomed.

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

The request to allow An Post facilities as Open for Consideration across all zoning objectives is considered to be inappropriate. The logistics and retail functions of An Post serve completely different roles and are appropriate to different land use objectives.

The request to have postal facilities included as a specific land use classification is deemed inappropriate due also to the differing nature of the two arms of the business.

The suggested policies to support post office services are considered to be sufficiently captured under Section 5.0 Sustainable Communities and its supporting policies and objectives.

The request to allow flexible parking standards for An Post facilities are noted. The DM standards of the TCDP allow for car-parking and service vehicles in such developments.

### **Recommendation**

Add Policy 5.7 of the Draft LAP with reference to postal facilities (Amendment 15)

**Submission Number: 12**

**Submission Name:**

Robert O'Meara

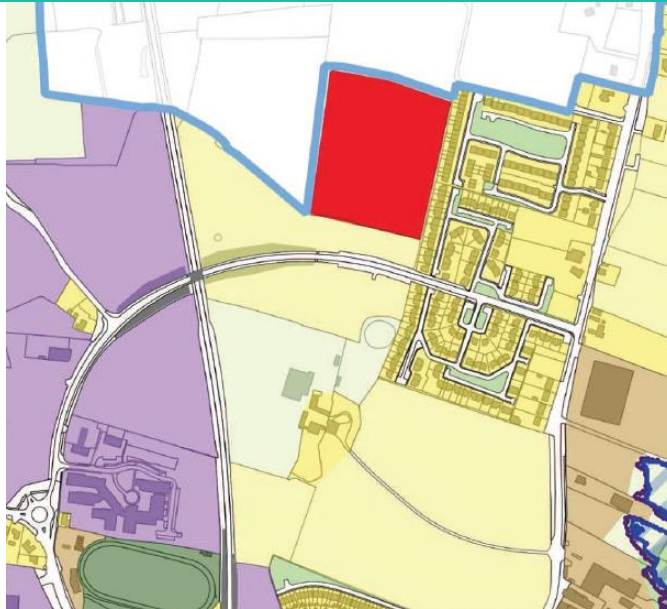
### **Submission Summary**

This submission by the O'Meara family welcomes the ambitious vision for Thurles to 2030. The following changes to zonings are sought:

1. Amend Residentially zoned land to adjoining the Jimmy Doyle Road to the south to reflect land ownership as per below map.



2. Zone un-zoned parcel of land north of the Jimmy Doyle Road for Residential purposes as per below map. The zoning for all other nearby land is Residential or Community Services and Infrastructure in an area that is already significantly residential and educational in nature. The submission outlines how this land is appropriate for Residential/Mixed Use/Open Space and Recreation in terms of its potential to further develop the area and its population. The submission states that this will be in the interest of the balanced development of the town and would complement any potential expansion of TÚS.



The submission also notes the Council’s intention to, ‘to support and assist landowners in the development of their lands for residential use’ (Section 3.3.2) and the landowners are keen to engage in any ongoing or future discussions about residential projects being developed in the area North of the Town Centre.

**Consideration**

The proposed additional land while outside the compact growth area and the 15 minute walk time to the town centre is serviced by footpaths and cycle lanes on the Jimmy Doyle Road with further interventions for active travel proposed through the LTP. The sites are proximate to TÚS which has expansion plans and a need for additional accommodation to meet the needs of existing and future students. The site is also proximate to Scoil Mhuire and a number of large employers including TÚS, Stakelums, Ború Stoves and Centenary.

In addition, these sites while not currently serviced are serviceable within the lifetime of the plan with this area of town being the most serviceable in terms of wastewater which is constrained in many other parts of the town.

**Recommendation**

Amend zoning as per submission request (Amendment 64)

**Submission Number: 22**

**Submission Name:**

Gavin Cronin (Deanscastle Developments Ltd.)

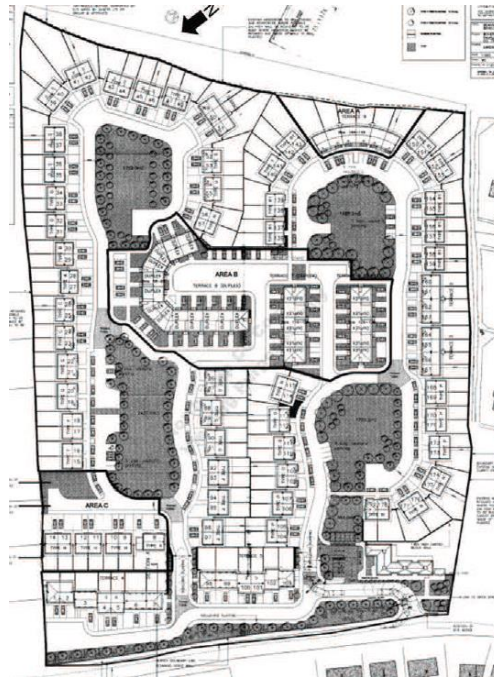
**Submission Summary**

This submission is made by Manahan Planners on behalf of landowners Deanscastle Developments Ltd. The submission seeks to retain the Existing Residential zoning currently in place on their landholding on Bohernamona Road, marked on the map in red, or to have it re-zoned for new Residential uses. The site is approx. 5.9 ha and located c. 1.3km north east of Thurles town. It is bounded to the north and south by residential development, to west by Bohernamona Road, and to the south west by a public park and rugby pitch.



Figure 1: Site Location Context Map showing the extent of lands in ownership in red and distance from the river Suir bridge

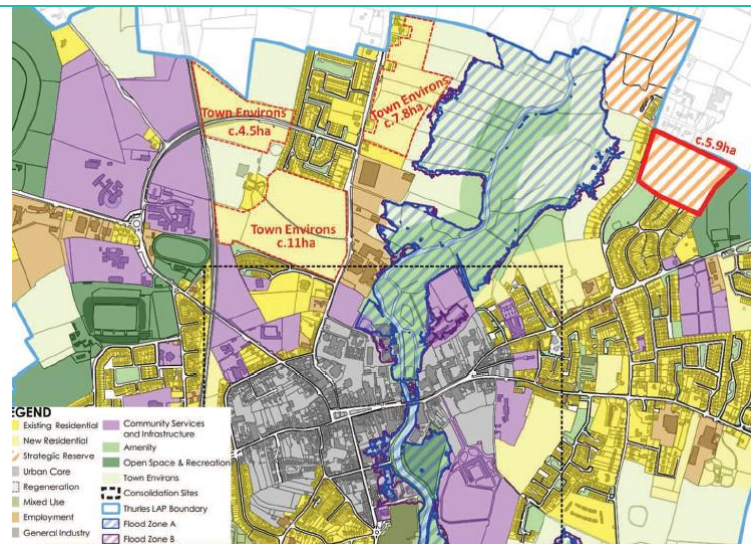
The subject site has planning history including 05511452 granted in 2006 for 144 houses, 8 apartments and a creche and 07511376 for amendments to the previous permission for a reduction in dwelling numbers. The final granted permission was for a total of 175 units. It is noted that both permissions have now lapsed (final proposed layout below).



There are active permissions to the south west of the site (201172 & 21279) for 125 units that includes a cycleway and crossing point on Bohernamona Road to the park.

The Draft LAP has a population projection of approx. 10,057 to 2030, an increase of 2,117 people and a requirement of approx. 784 additional units. There are currently 250 units with active planning permission primarily to the east of the river. These are however not guaranteed to be developed.

The Draft LAP has assigned a Strategic Reserve zoning to the subject site, the landowner is requesting to re-zone the site for New Residential uses. The reason for the request is due to an imminent planning application on the site which is due to be lodged before the new LAP is adopted.



The Draft LAP has zoned land that the submission considers unrealistic, e.g. c. 11 ha of land adjoining Ardfort House on Brittas Road. Further sites on Jimmy Doyle Road and Brittas Road are considered to be less appropriate than the subject site and should be zoned as Strategic Reserve. There may also be submissions from other landowners who request that their land is de-zoned due to the RZLT.

The Draft LAP SLA indicates that the subject site has no access to a foul sewer which is incorrect. A sewer has been indicated to the landowner by UÉ in the south west corner of the site during pre-planning and so the site is serviceable.

The site is also adjacent to residential areas, public parks and sports facilities and has easy access to the anticipated greenway outlined in the LTP. While there are no existing cycle lanes on Bohernamona Road, there are high quality pedestrian routes through the park. Future development on the subject site could include a cycleway along the western boundary connecting to the park. Pedestrian connections to the rugby grounds and soccer club will also be included in future development to promote sustainable transport. The SLA table should have included a criteria for access to social amenities which this site fulfils. The subject site is c. 16 minutes walk and c. 5 minute cycle which is not an unreasonable distance having regard to the other close by amenities.

A pre-planning consultation has taken place between the developer and the District Planner and District Engineer on 10<sup>th</sup> May 2023 in relation to the forthcoming planning application for a residential development of c. 172 units over two phases (draft plan below). The first phase will adjoin Bohernamona Road and will include the creche. The second stage will complete subsequently on feedback with the LA in phase one. The possibility of a cycleway to the west of the site is currently being investigated linking to existing pathways and LTP proposals. The application is anticipated to be lodged in October 2023, therefore it is requested that the zoning be amended to Existing Residential or to New Residential.



While there is planning history on the site, it has expired since 2013. The site is peripheral in nature and located outside the compact growth and 15 minute walk time to the town centre. Although the site is proximate to certain recreational amenities, it is not considered to be currently well served in terms of active travel links to the town centre and wider area.

The submission states that a development is planned for this site imminently and that the site has access to a sewer on the south west corner, however engagement with UÉ has determined that the development would require a pumping station. Hydraulic modelling carried out under the Thurles DAP also predicts flooding from sewers in estates south of the development and further downstream as a result of this development. Network upgrades would be required to facilitate a connection here.

It is considered that a New Residential zoning on this site would be premature but that the site is appropriate for future development subsequent to the development of more appropriate sites within the LAP area, therefore the Strategic Reserve allocation is considered most appropriate.

### Recommendation

No alterations recommended to the Draft LAP

<b>Submission Number:</b> 24	<b>Submission Name:</b> Donal and Eleanor Commins
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### Submission Summary

This submission is made by Ryan Architectural Solutions Ltd. on behalf of landowners Donal and Eleanor Commins. The submission relates to lands indicated in red on the map of just under 8.5 ha. The existing LAP zones the land for low density residential development to the front half of the site and Agricultural to the rear. The landowners consider that if the land is to be zoned for Residential development then the extent of the landholding should be zoned for Residential uses and not part Residential, part Town Environs in order to make the prospect

more financially viable to any developer. The land can be serviced by all services with the map showing three potential access points to services.

The landowners are seeking for the full landholding outlined in red to be zoned for low to medium density Residential uses.



### Consideration

The site is considered to be on the periphery of the town with limited wastewater capacity. It is considered that there are more appropriate sites for New Residential development with more advanced development prospects within the LAP area. The site is considered to be important for the strategic development of the town and will be considered for residential uses in the next review of the Thurles LAP.

### Recommendation

Amend site to Strategic Reserve (Amendment 55)

**Submission Number: 26**

**Submission Name:**

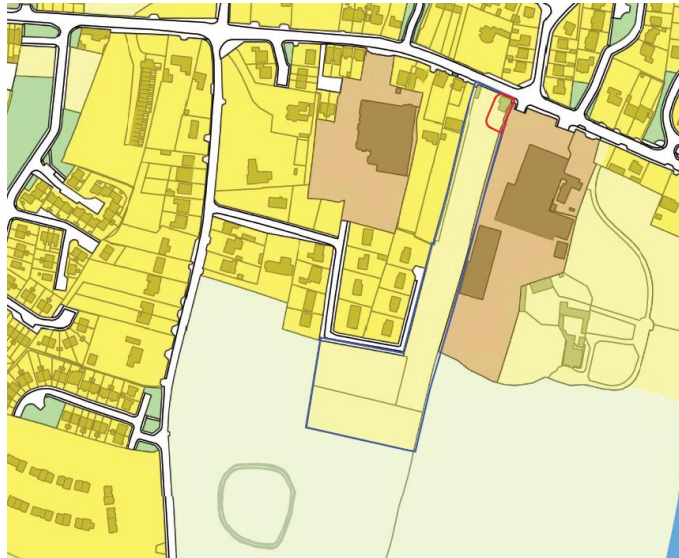
David and Ann Commins

### Submission Summary

This submission is made by Ryan Architectural Solutions Ltd. On behalf of landowners David and Ann Commins. The submission relates to lands indicated in red on the map of just under 0.11 ha. The existing LAP zones the land for low density residential development, the landowners are seeking a zoning change to commercial, retail or employment uses in order to facilitate the development of a café or shop to serve the adjacent estates. There only similar development (café/shop) is a 10-15 minute walk from these housing estates at present. The site can be serviced with all services and adjoins a permitted development. A prospective development would provide employment in the area and give a social outlet to elderly in the neighbourhood.



The landholders, therefore seek for a zoning change to mixed use or retail/commercial.



### **Consideration**

The site area is c. 0.11 ha, thus suitable only for a neighbourhood shop or café both of which are open for consideration under the existing Residential zoning.

### **Recommendation**

No alterations recommended to the Draft LAP

### 3.4 Submissions Relating to the Draft Local Transport Plan

**Submission Number: 21**

**Submission Name:**

Kieran Healy

#### **Submission Summary**

This submission was made on behalf of the Board of Management of Presentation Primary School. They are concerned that the proposed change on Mitchel Street to a one-way traffic flow will hinder access to the school of over 250 families and 40 staff. They do not believe that the changes would benefit the school. They state that it is imperative that the street remain two-way as far as Butler Court at a minimum but the preference would be that the change would be re-evaluated. If the proposal goes ahead there is a risk that the school will be used as a 'rat run' from Butler Court Avenue, through the school onto Cathedral Street thereby avoiding the traffic on Kickham Street and by-passing the one-way system on Mitchel Street.

There is an additional request for double yellow lines to be added to Butler Court Avenue to prevent parking on the roadway and blocking access to the school. It is requested that, as part of any works around Mitchel Street, school signage, traffic calming measures and double yellow lines on Butler Avenue as included. It is further requested that planning conditions relating to parking on Butler Avenue being confined to dedicated parking bays, be enforced.

#### **Consideration**

The submission points regarding access to the school are noted. Currently, the access routes along Mitchel Street are very unattractive for pedestrians and cyclists. This is primarily due to parking on footpaths which reduces widths available for pedestrians to well below minimum standards. One of the core objectives of the LTP is to improve safety for children accessing school and increase the active mode share for travel to schools within Thurles. The delivery of the one-way proposal on Mitchel Street will have the following benefits:

- Provide sufficient space to formalise the on-street parking and improve public realm and widen footpaths along Mitchel Street. This will create a more attractive environment for children walking and cycling to school.
- Facilitate the rationalisation and upgrade of the Cathedral Street/Mitchel Street junction improving safety for pedestrians and cyclists
- Provide an attractive connection to proposed public realm upgrades on Cathedral Street. This will form a safe, attractive connection for pedestrians between the school and Liberty Square.

Vehicular access will be retained to the Presentation Primary School with relatively short detours required for parents dropping children to school. The LTP also supports future increased Park and Stride initiatives where parents could park a short distance away and walk their children on the last leg of the journey into school, or in the case of the proposed East-West Greenway which proposes to provide a walking and cycling shared path to allow students to bypass the congested streets of the town centre and to travel directly to their school on an off-road path; and provide a facility for parents to drop-off children at the end of the shared path nearest to them (or at some intermediate point away from the town centre) and allow the children to walk to school in safety. The East-West Greenway as proposed

in the plan is to provide a direct connection to the Presentation Primary and Secondary School campus.

All of the measures proposed in the LTP are aimed at improving safety and encouraging sustainable travel for short distance trips to school in-line with National Policy.

The concerns for potential rat-running through the school grounds for parents dropping off children to school is noted. As is best practice with Safe Routes to Schools schemes, the implementation of any safety measures will be monitored, and if necessary, mitigation measures introduced to address residual problems. In this instance, this could include temporary restrictions of access through school grounds at set down and drop-off times.

The LTP supports the delivery of Safe Routes to School initiatives across all schools within Thurles. This includes school zone treatments and signage to encourage safe driver behaviour and create a calmed traffic environment.

The roads within Butler Court have not been taken in charge and remain private. Tipperary County Council has no jurisdiction within private estates to implement double yellow lines, until such time as the estate is deemed public, the necessary amendments to the Thurles Town parking-byelaws can't be updated to allow enforcement of any implemented parking controls.

### **Recommendation**

No alterations recommended to the Draft LAP

