



Planning Department
Tipperary County Council
Limerick Road
Nenagh
Co Tipperary

On-line submission portal; <https://consultations.tipperarycoco.ie/>

Dáta | Date
12 December, 2023

Ár dTag | Our Ref.
TII23-124126

Re: Proposed Material Alterations to the Draft Nenagh and Environs Local Area Plan, 2024 – 2030

Dear Sir/Madam,

TII acknowledges receipt of referral of the Proposed Material Alterations to the Draft Nenagh and Environs Local Area Plan, 2024 – 2030. The Authority acknowledges and welcomes the Proposed Material Alterations arising from consideration of the Authority's initial submission on the Draft Local Area Plan. In relation to other Proposed Material Alterations on display, TII outlines the following observations for the Councils consideration;

Proposed Amendment no. 12

TII notes Proposed Amendment to the text associated with the employment lands at Gortlandroe and the proposal to subject the lands to a Masterplan approach.

In TII's initial submission on the Draft Local Area Plan, the Authority outlined that it was not aware of any evidence base developed to address the requirements of the DoECLG Spatial Planning and National Roads Guidelines in relation to the extensive greenfield employment lands proposed adjacent to the existing Gortlandroe Industrial Park, in the vicinity of the N52, strategic national road. TII welcomes that the Proposed Amendment seeks to subject the lands to a Masterplan prior to the development of the lands.

Where proposals are subject to Masterplan exercises, appropriate consultation with statutory stakeholders should be undertaken and TII recommends that any adoption process or framework should be clearly identified in accordance with the requirements of official policy concerning such non-statutory frameworks.

Recommendation

- Where proposals are subject to Masterplan exercises, appropriate consultation with statutory stakeholders should be undertaken and any adoption process or framework should be clearly identified in accordance with the requirements of official policy concerning such non-statutory frameworks.

Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 140.

Proposed Amendment no. 16

TII notes the Proposed Amendment addresses one-off housing in the Town and Environs area. The Proposed Amendment includes a footnote that cross references to Development Plan provisions. As the Town and Environs area includes the strategic national road network, TII considers it important to also include reference to Policy 12-4 of the Development Plan and the Council policy to avoid the creation of additional access points to national roads to which speed limits greater than 60kmh apply.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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Recommendation

TII would welcome consideration by the Council of the following:

- Include a cross reference in the footnote to Proposed Amendment 16 of the Draft Plan referring to Policy 12-4 of the County Development Plan in the interests of providing clarification and early assistance to applicants in the preparation of any one-off housing planning application where there may be implications for the strategic national road network in the area.

Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 140.

Proposed Amendment no. 30

TII notes that Proposed Amendment no. 30 proposes introducing a new Policy to the Local Area Plan;

‘Require that grid connection routing for renewable energy development proposals should avoid materially impacting the road network, where possible’.

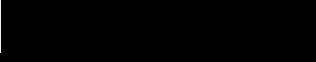
TII’s recommendation in the Authority’s submission on the Draft Local Area Plan advised that the Authority would welcome consideration being given to including an objective in the Local Area Plan, in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection cable routing should seek to utilise available alternatives, as opposed to being placed along the strategic national road network contrary to the provisions of official policy.

With regard to the above, TII would highlight that the Authority’s submission only relates to national roads.

Conclusion

The Authority respectfully requests that the foregoing observations are taken into consideration by the Council prior to the adoption of the Nenagh and Environs Local Area Plan, 2024 - 2030.

Yours sincerely,



Michael McCormack
Senior Land Use Planner