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Nenagh Local Area Plan,
Planning Department,
Tipperary County Council,
Civic Offices,
Limerick Road,
Nenagh,
Co. Tipperary.

18th December 2023

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

SRA File Ref: 23/007

A Chara,

I refer to your notice of the preparation of *Proposed Material Alterations to the Draft Nenagh and Environs Local Area Plan (LAP) 2024-2030* received on 17th November 2023.

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

This submission is a follow-up to our submission dated 11th September 2023, on the *Draft Nenagh and Environs Local Area Plan 2024-2030* and is intended to assist the Council in ensuring the principles set out in the LAP align with the Development Plan, RSES and National Planning Framework. It also aims to ensure Nenagh can maximise its potential and investment under Project Ireland 2040 and the National Development Plan and promote its transition to a more sustainable settlement pattern. It is not intended to provide detailed comments on all the PMAs, but rather to focus on matters considered to be of a strategic, regional nature, referring

to the relevant policy context of the RSES and its current implementation actions, where relevant.

Development Strategy and Compact Growth

The SRA welcomes the clarification provided under Proposed Material Alterations (PMAs) 6, 7, 43, 44 and 46 in relation to the quantum of land zoned *Existing Residential*, *New Residential*, *Regeneration*, *Strategic Reserve*, *Town Environs* and *Urban Core*. Our previous submission highlighted the welcome approach the Council is taking in relation to promotion of the town centre in the LAP, with the inclusion of a specific chapter *Town Centre Strategy*, as well as its success in attracting URDF and RRDF funding to rejuvenate and redevelop the town centre in line with *RPO 34 Regeneration, Brownfield and Infill Development* of the RSES. It is noted that the stated quantum of land zoned *New Residential* has increased from 60.05 ha in the *Draft Plan* to 65.49 ha as part of the PMAs. The amount zoned *Regeneration* (with a 30% residential share) has reduced from 13.26 ha in the *Draft Plan* to 10.28 ha in the PMAs. As set out in our previous submission, there is a concern regarding the amount of land zoned, with the Draft Plan setting out a requirement of approximately 44.4 ha. of serviced/serviceable residential lands by 2030, in line with the Development Plan methodology. The residential density figure of 25 dph used as part of the calculations, is considered very low (including in a suburban context) and the SRA still considers higher density targets should be considered as part of the calculations particularly for sites within the town centre and close to public transport service. This would ensure the LAP fully embraces and promotes the Town Centre First approach and aligns with its objectives of compact and sequential growth as well as national and regional guidance regarding compact growth.

Economic Development and Enterprise

We welcome the proposed amendments relating to economic development and enterprise, including clarification around the need for wastewater infrastructure to be provided to service Site 6, identified in Appendix 1- Employment Lands SLA, as set out in PMA 11, and requirement for a masterplan to be prepared for the Gortlandroe Industrial Park to ensure it develops in planned and sustainable manner, as set out in PMA 12. The proposal to provide Tier 1 and Tier 2 approaches to the development of land zoned *Employment*, in PMA 47 will help to ensure these lands are developed in a more sustainable manner.

Sustainable Mobility and Transport

The SRA welcomes additions and clarifications on issues relating to sustainable mobility including integration of actions from the Local Transport Plan into the document. RPO 151 *Integration of Land Use and Transport*, RPO 152 *Local Planning Objectives*, RPO 154 *Land Use Plans* and RPO 157 *Local Transport Plans* of the RSES support this approach. The support for additional national, regional and local bus and rail services and multi-modal interchange hub at Nenagh Railway Station in PMA 23 and demand management measures in PMA 24, are particularly welcome in supporting a positive modal shift to sustainable transport. The SRA in conjunction with the two other Regional Assemblies, has recently launched the *Sustainable Mobility Academy* as part of *Pathfinder Programme* of the *National Sustainable Mobility Policy*, which could provide some useful examples or case studies to assist further development in this area, and is available through the following link: [Sustainable](#)

[Mobility Academy - Home](#). The map showing the indicative locations for the proposed road interventions in PMA 25 is welcomed in terms of clarity.

Climate Action and Sustainability

The SRA welcomes the inclusion of additions to the text relating to climate resilience, compact growth approach, energy efficiency and district heating in PMAs 3, 5, 8, 9 and 10, which is in line with RPOs such as 89 *Building Resilience to Climate Change*, 221 *Renewable Energy Generation and Transmission Network* of the RSES.

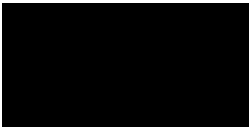
Monitoring and Evaluation

The SRA welcomes the additional section on implementation and monitoring of the LAP objectives set out in PMA 41. This will assist the Council in ensuring implementation of the LAP and employing useful indicators to assess progress.

Conclusion

The SRA welcomes the public consultation at Proposed Material Alterations stage for the preparation of a new Local Area Plan for Nenagh. The RSES team is available for further consultation and for any clarification required regarding this submission.

Mise le meas,



David Kelly

Director, Southern Regional Assembly