

9<sup>th</sup> December 2024

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

**Re: Draft Carrick-on-Suir Local Area Plan 2025-2031**

A chara,

Thank you for your authority's work on preparing the draft Carrick-on-Suir Local Area Plan 2025-2031 (the draft Local Areal Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft Local Area Plan against the backdrop of an evolving national and regional planning policy and regulatory context and the need to balance competing pressures within an increasingly complex system.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Local Areal Plan under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the Tipperary County Development Plan 2022-2028 (the County Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly (SRA) area, and relevant section 28 guidelines. This submission makes (6) recommendations and (2) observation.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, Tipperary County Council (the Planning Authority) is required to implement or address recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The Planning Authority is requested by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The Planning Authority is requested by the Office to give full consideration to the advice contained in a submission.

## **Overview**

The Office commends the significant work of the Planning Authority in preparing a comprehensive draft Local Area Plan for Carrick-on-Suir. The draft Local Area Plan includes several supporting documents, including a Serviced Land Assessment (SLA) (appendix 1), Sustainable Transport Plan (appendix 2), Regeneration Sites (appendix 3) and the relevant statutory reports including an Appropriate Assessment Screening and Natura Impact Report, a Strategic Environmental Report and a Strategic Flood Risk Assessment (SFRA) which are welcomed by the Office.

The draft Local Area Plan is particularly strong on climate action mitigation and adaptation and the Office commends the approach taken by the Planning authority to highlight the objectives that relate to climate action throughout the plan including in relation to energy, regeneration, active travel and the circular economy.

The Office welcomes the approach taken by the Planning Authority to focus on the consolidation and regeneration of Carrick-on-Suir to enhance compact growth and improve connectivity across the plan area. In particular, the Office strongly commends the identification of masterplan-led developments for both residential and employment lands.

The Office also welcomes the significant efforts made in the preparation of the Sustainable Travel Plan to inform the Local Area Plan (appendix 2). The existing and proposed form of development promotes plan-led, sustainable development over the plan period as well as a modal shift towards more sustainable modes of transport that aligns with the principles of the Climate Action Plan 2024.

The Office acknowledges the strong policies in relation to the regeneration of the town centre and looks forward to the forthcoming Town Centre First Plan which will be brought forward as a material alteration to the Local Area Plan.

The Office welcomes the Monitoring and Evaluation Framework (appendix 5) and the commitment to undertake a programme of monitoring and evaluation of the draft Local Area Plan over the lifetime of the plan.

The Office has identified a relatively small number of matters that require further consideration prior to the adoption of the Plan, in particular in relation to the SFRA where further work will be required to ensure that land at risk of flooding is not zoned for vulnerable development and that flood risk is appropriately managed.

It is within this context the submission below sets out (6) recommendations and (2) observation under the following 7 themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Consistency with the Tipperary County Development Plan 2022-2028</a>	<a href="#">Recommendation 1</a>	
<a href="#">Compact growth and regeneration</a>	<a href="#">Recommendation 2</a> and <a href="#">3</a>	
<a href="#">Amenity and recreation</a>		<a href="#">Observation 1</a>
<a href="#">Transport and accessibility</a>	<a href="#">Recommendation 4</a>	
<a href="#">Flood risk management</a>	<a href="#">Recommendation 5</a>	
<a href="#">Economy and employment</a>	<a href="#">Recommendation 6</a>	
<a href="#">Environment and built heritage</a>		<a href="#">Observation 2</a>

## **1. Consistency with the Regional, Spatial and Economic Strategy**

Carrick-on-Suir is located within the SRA area and has close economic, cultural and social links with the Waterford Metropolitan Area.

As the Planning Authority is aware it is an overarching objective of the SRA RSES in respect of towns like Carrick-on-Suir, to encourage a 'sustainable, infrastructure-led growth approach'. In this regard the Office welcomes the draft Local Area Plan which promotes active travel measures, targets regeneration and supports the strengthening of the viability of the town.

Overall, the Office is satisfied that the provisions of the draft Local Area Plan are broadly consistent with the RSES.

## **2. Consistency with the Tipperary County Development Plan 2022-2028**

Carrick-on-Suir is identified as a District Town in the County Development Plan. 20% of total population growth is attributed to all District Towns over the plan-period which is reflected in the core strategy table (table 2.4).

The County Development Plan recognises the importance of employment to Carrick-on-Suir and the potential for expansion of the employment offering having regard to the town's location, accessibility and environmental and infrastructural capacity. In this regard, the Office particularly welcomes Policies 4.1 and 4.2 and Objectives 4A and 4B of the draft Local Area Plan.

The planned upgrading of the Limerick-Waterford rail line and the re-routing of the N24 Waterford-Limerick route to the north of Carrick-on-Suir are recognised as key infrastructural projects for the town and the Office commends Objectives 6B and 6C in support of these infrastructural improvements.

In accordance with Objective 4-A of the County Development Plan, a Serviced Land Assessment has been prepared for Carrick-on-Suir with respect to land zonings for both residential and employment uses.

### **2.1 Core strategy - New Residential lands**

Section 19(2) of the Act requires a local area plan to be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.

The County Development Plan core strategy sets out a projected population increase of 1,154 people to 2031 or a total projected population of 6,925 by the end of the plan period with a commensurate housing supply target of 427 units. The Office is satisfied that the population and housing growth for the plan period (which extends to 2031) is consistent with the core strategy of the County Development Plan.

The County Development Plan core strategy identifies a need for 28.5 ha of zoned land in Carrick-on-Suir to accommodate the projected level of growth to the end of the plan period. The draft Local Area Plan indicates that there are 31.29 ha of New Residential zoned land and 10.39ha of Strategic Reserve zoned lands.

The Office is satisfied that all of the lands proposed to be zoned New Residential are well located, contiguous to the existing built up footprint, within the CSO settlement boundary<sup>1</sup> and are consistent with RPO 35 of the RSES in relation to compact growth.

## **2.2 Strategic Reserve lands**

All of the proposed New Residential lands are located within the CSO settlement boundary with Strategic Reserve lands forming part of the N24 corridor to the north of the town. The Serviced Land Assessment (appendix 1) deems all proposed New Residential lands located outside of the Strategic Reserve lands as Tier 1.

The Office notes that the policy approach with respect to the Strategic Reserve lands is not clear, in particular in relation to the inconsistency between section 2.4.3 and table 12 Land Use Zoning Objectives. The future development potential of the Strategic Reserve lands should be protected to facilitate the planned upgrade of the N24 at the location of these lands. To this end the draft Local Area Plan should clarify that development on lands identified as Strategic Reserve will not be considered.

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<sup>1</sup> This means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO in line with UN criteria i.e. having a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 metres, and where there is evidence of an urban centre (shop, school etc.).

## Recommendation 1 – Strategic Reserve lands

Having regard to the quantity of land zoned for Strategic Reserve lands, the principles of compact growth and the sequential approach, and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- RPO 35 of the RSES to promote compact growth;
- Objective 12-B of the Tipperary County Development Plan 2022-2028 in relation to the upgrading of the N24 as a Major Roads Project; and
- Policy 6.5 of the draft Carrick-on-Suit Local Area Plan in relation to the preservation and safeguarding of the proposed N24 Waterford to Cahir Scheme as a Major National Road Project,

the Planning Authority is required to amend section 2.4.3 so that it aligns with the description for Strategic Reserve lands in table 12 Land Use Zoning Objective and make clear that no development on these lands during the plan period will be considered.

### 3. Compact growth and regeneration

#### 3.1 Compact growth

In order to achieve sustainable residential developments and compact settlements it is important that the most appropriate densities are achieved at the most appropriate locations. Section 3.3 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) contains updated guidance on residential densities. Specifically, Policy and Objective 3.1 states:

*It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.*

In respect of the development potential of lands zoned New Residential, the draft Local Area Plan states that a density of 15 uph which aligns with the County Development Plan core strategy for Carrick-on-Suir.

In respect of Key Towns and Large Towns (5,000+ population) table 3.5 of the Compact Settlements Guidelines states:

*It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations.*

While it is acknowledged that the application of higher densities for these lands based on existing public transport availability could be considered excessive, it is also evident that lower densities make it less viable to expand public transport infrastructure. Having regard to:

- the strategic objectives of the draft Local Area Plan to promote sustainable movement;
- the density ranges for suburban areas referred to in table 3.5 as above;
- the growth of the Local Area Plan lands in a sustainable manner to assist with decarbonising the built environment;
- Strategic Objective SO-9 of the County Development Plan to enhance connectivity and promote sustainable transport, through the integration of land-use and transport planning; and
- Policy 4-1 of the County Development Plan in relation to the application of an appropriate density for new residential development,

the policy intention should be to seek higher densities at certain locations across the plan area, where appropriate and where site context is suitable.

### **3.2 Regeneration**

The Office commends the Planning Authority for the inclusion of strong policies in relation to the regeneration of Carrick-on-Suir's town centre. Aligning with RPO 35 of the RSES which supports compact growth, six regeneration sites have been identified in the draft

Local Area Plan along with Key Planning Criteria for each (appendix 3). A Town Centre First Plan for the town will be brought forward as a material alteration during the Local Area Plan process, which the Office welcomes.

The Office notes the Carrick-on-Suir Regeneration Plan which has been developed over the past 10 years, and welcomes the policy approach outlined in the draft Local Area Plan to support the regeneration of buildings, working collaboratively with landowners and the Town Regeneration Officer.

The Office commends the inclusion of Objective 3D which references a variety of mechanisms (including compulsory purchase orders) to develop and improve areas in need of regeneration which aligns with RPO 37 of the RSES.

The Office welcomes the focus on higher density, well connected and high-quality urban housing with respect to residential development on regeneration sites and infill sites in the town centre (section 5.1.1 refers). However, this statement should also be incorporated into the Key Planning Criteria for each of the six regeneration sites (appendix 3) and cross referenced in Policy 3.2 which would align with the Compact Settlements Guidelines.

### **Recommendation 2 – Compact growth and regeneration**

Having regard to the compact and sustainable growth of Carrick-on-Suir and continued plan-led expansion of the town, and in particular to:

- RPO 35 of the RSES which supports compact growth;
- Policy and Objective 3.1 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) to achieve higher densities at appropriate locations; and
- Policy 4-1 of the Tipperary County Development Plan 2022-2028 which will apply an appropriate density for new residential development in line with section 28 Guidelines,

the Planning Authority is required to:



- (i) identify sites where there is scope within the context of the Compact Settlements Guidelines for higher densities to be applied in order to maximise the return on public transport investment; and
- (ii) amend the Key Planning Criteria for the six regeneration sites (appendix 3) to provide for higher density, well connected and high-quality urban housing (to align with section 5.1.1 of the draft Carrick-on-Suir Local Area Plan 2025-2031).

### 3.3 Masterplan to north of Coolnamuck Road

The draft Local Area Plan identifies a 6.22 ha site at Carrickbeg for New Residential development. This site is well located and is within close proximity to Carrick-on-Suir. The draft Local Area Plan includes Policy 5.2 to prepare a masterplan for these lands in order to allow for co-ordinated, plan-led growth. The Office advises that any masterplan should be prepared. While the Office notes the detail contained within Policy 5.2 it considers that the policy would benefit from the inclusion of guidance in relation to the future development of these lands including in relation to layout, connections with existing and proposed walking and cycling routes, massing, permeability, heights and materials.

#### Recommendation 3 – Masterplan to north of Coolnamuck Road

Having regard to the co-ordination of land use zoning, infrastructure and services and the provision of sustainable transport options, and in particular to;

- RPO 9 of the RSES prioritising the delivery of compact growth and sustainable mobility including in relation to sustainable travel and provision of services;
- RPO 26 of the RSES supporting coordination between the planning authority and infrastructure providers in towns and villages;
- section 3.6 of the RSES where a sustainable, infrastructure-led growth approach is encouraged at an appropriate scale; and
- Objective SO-9 of the Tipperary County Development Plan 2022-2028 promoting sustainable transport, through the integration of land-use and transport planning with sustainable travel patterns,

the Planning Authority is required to:

- (i) amend Policy 5.2 to set out the key principles in relation to the phased development of the New Residential lands to the north of Coolnamuck Road, particularly in relation to sustainable mobility and connections with existing and proposed walking and cycling routes in the town, and identify key infrastructure constraints or requirements and the mechanisms by which these will be resolved; and
- (ii) details in relation to the masterplan preparation process should be clearly set out including who the masterplan will be prepared by, the timing of the masterplan (i.e. prior to, or in parallel with, any further planning application), and the details to be included in the masterplan to guide future development (including layout, massing, permeability, heights, materials etc.).

#### **4. Amenity and recreation**

The Office commends the preparation of the Social Infrastructure Assessment (appendix 4) to inform the draft Local Area Plan, and notes that the assessment identifies a deficiency in play spaces in Carrickbeg, Clairin and the Green Hill Village areas. Policy 5.2 requires the preparation of a masterplan for lands in Carrickbeg to deliver a playground and play spaces. However, there is no other supporting objective (either in the draft Local Area Plan or the County Development Plan) to support the delivery of the above playgrounds/ play spaces elsewhere in Carrick-on-Suir).

##### **Observation 1 – Amenity and recreation**

Having regard to Policy 6-2 of the Tipperary County Development Plan 2022-2028 which supports and encourages the provision of amenities, the Planning Authority is advised to include a specific objective in section 5.6 of the draft Carrick- on- Suir Local Area Plan 2025-2031 to deliver playgrounds in the Clairin and Green Hill Village areas of Carrick-on-Suir.

## 5. Transport and Accessibility

RPO 152 of the RSES seeks to deliver a high level of permeability for walking, cycling and public transport modes. RPO 176 of the RSES promotes the 10-minute town concept where community facilities and services are accessible by public transport or are located within a 10-minute walk or cycle from the town centre. The Office notes figure 2 of the Sustainable Transport Plan where Carrick-on-Suir is shown as a compact settlement with significant parts of the settlement being located within a 10-minute walk of the town centre and the majority of all lands within the settlement being located within a 15-minute cycle.

The Office commends the Planning Authority for the preparation of a Sustainable Transport Plan for Carrick-on-Suir (appendix 2) and particularly for the inclusion of minimum modal shift targets towards more sustainable modes of transport. The Office commends Objective 6E which supports the delivery of these targets.

The planned upgrade to the N24 has the potential to remove through-traffic from the town centre for the benefit of pedestrians and cyclists in particular. While segregated cycle lanes are provided to the west and east of the town, they are not currently connected through the town centre. It is evident in table 11 there is a clear intention to connect the existing cycle network from west to east along the North Quay, however, given the proposed re-routing of the N24 to the north, the Office would welcome the provision of an alternative cycle route along the length of the current N24.

While it is a significant advantage to have a rail station in Carrick-on-Suir, the current infrequent service to and from the town is not user friendly. To this end the Office commends Objective 6C, where the Planning Authority will collaborate with the National Transport Authority (NTA) and Irish Rail to consider how the current rail service offering can be improved. A similarly worded Objective 6D, with respect to collaboration between the Planning Authority and the NTA and bus service providers to improve the bus service in the town, is also welcomed.

Carrick-on-Suir has a number of residential estates laid out in a cul-de-sac typology with poor connectivity. The Office welcomes Policies 6.1 and 6.3 in particular which require new development to improve accessibility and movement within Carrick-on-Suir, Objective 6E supporting modal shift and Objective 6G to improve permeability. While map 1 of appendix 2 is noted, the Office recommends that this map is reviewed to ensure

that all possible pedestrian connections between residential areas (both existing and proposed) and the town centre, train station, employment areas and schools are fully considered. This would also support Objective 5B where it is an objective of the Planning Authority to develop linkages between and within identified neighbourhoods in section 5.1.1, the town centre, train station, employment areas and schools.

In order to ensure consistency between the draft Local Area Plan and the County Development Plan the Office recommends that Policy 6.9 of the draft Local Area Plan relating to the safeguarding of the N24 route, be amended to include a reference to Policy 12-4 of the County Development Plan, where additional access points to national roads to which speed limits greater than 60kmh apply shall be avoided.

#### **Recommendation 4 – Sustainable travel and access onto the national road network**

Having regard to the need to promote sustainable modes of transport and to ensure that the carrying capacity of the national road network is not compromised, and in particular to:

- RPO 151 of the RSES to maintain and protect the strategic transport function of national roads in accordance with national policy;
- sections 2.5 and 2.6 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) in relation to access onto national roads;
- Policy 12-4 of the Tipperary County Development Plan 2022-2028 (the County Development Plan) in relation to additional access points onto national roads;
- RPO 152 of the RSES to deliver a high level of permeability for walking, cycling and public transport mode;
- SO-9 of the County Development Plan which promotes sustainable transport and prioritises public transport, walking and cycling; and
- Policies 6.1 and 6.3 and Objectives 6E and 6G of the draft Carrick-on-Suir Local Area Plan 2025-2031 (the Local Area Plan),

the Planning Authority is required to:

- (i) include a specific objective to create a dedicated cycle lane from west to east of Carrick-on-Suir along the N24 through the town to include safe access to schools, the train station, employment areas and the identified regeneration sites;
- (ii) review and update map 1 of appendix 2 and incorporate this map into the draft Local Area Plan to show all possible pedestrian connections between residential areas (both existing and proposed), the town centre, train station, employment areas and schools and to cross reference this map in Objective 6G; and
- (iii) amend Policy 6.9 of the draft Local Area Plan, relating to the safeguarding of the N24 route, to include a reference to Policy 12 - 4 of the County Development Plan, where additional access points to national roads to which speed limits greater than 60kmh apply shall be avoided.

## **6. Flood risk management**

The Office commends the SFRA that has been prepared to inform the draft Local Area Plan. Flood Zones A and B have been identified on the legends of map 1a (Overall Zoning Map) and map 1b (Town Centre Zoning Map) in accordance with NPO 57 of the National Planning Framework, RPO 114, RPO 115 and RPO 116 of the RSES and The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

The Office notes, in table 4.1 of the SFRA that Preliminary Flood Risk Assessment (PFRA) was not used for flood zone mapping as recent guidance from the Office of Public Works indicates that the dataset has been superseded by more recent data sources. While indicative flood mapping datasets for PFRA fluvial have been superseded, PFRA pluvial mapping has not been superseded and, as such, table 4.1 and section 4.2.1 of the SFRA should be revised and any necessary amendments made to the remainder of the SFRA.

The Office welcomes the inclusion of flood risk mapping in the land Use Zoning Map, which provides clarity and assists in the management of flood risk at both the plan-making and development management stages. However, while it is clear where the

boundaries relating to Flood Zone A are located, the full extent of Flood Zone B is unclear at certain locations on map 1a (Land Use Zoning Map) and should be clarified.

While the Office welcomes the provision of plan making justification tests (Justification Test) in the SFRA it has not been demonstrated how each of the sub criterion of part 2 of the Justification Test has been satisfied in each instance.

Under the sequential approach to flood risk set out in the Flood Guidelines, where flood risk cannot be avoided or the type of development substituted, Justification Test must be passed before lands at risk of flooding can be zoned for vulnerable development. In carrying out the Justification Test the guidelines (including box 4.1) state that all of the criteria set out in box 4.1 must be satisfied.

In addition to the above, the Office also specifically notes that Justification Test have not been prepared for lands zoned Community Services and Infrastructure immediately south east of Dillon Bridge, and lands zoned Existing Infrastructure between Willow Vale and the railway line to the north and east of the town.

As such, the SFRA should be reviewed in the context of the sequential approach and, where a proposed zoning objective does not pass the Justification Test the land should not be zoned for highly vulnerable (flood zone A and B) or less vulnerable (flood zone A) uses.

The land use zoning matrix should also be reviewed and updated to include an objective to limit land uses in flood risk areas to uses that are appropriate to the level of flood risk in the subject area.

### **Recommendation 5 – Flood risk management**

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

- RPO 116 of the RSES whereby consideration must be given to future appropriate land-use policies in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (the Flood Guidelines) to avoid inappropriate development in areas at risk of flooding;
- the Flood Guidelines; and

- The Strategic Flood Risk Assessment (SFRA) of the draft Carrick-on-Suir Local Area Plan 2025-2031 (the draft Local Area Plan) (appendix 10),

the Planning Authority is required to:

- (i) update table 4.1 and section 4.2.1 of the SFRA to ensure that Preliminary Flood Risk Assessment pluvial mapping is used for flood zone mapping and to make any necessary consequent changes to the SFRA and the draft Local Area Plan (including Zoning Maps) on foot of these amendments;
- (ii) update Zoning Maps to clearly show the full extent of Flood Zone B;
- (iii) review and update the land use zoning matrix and include an objective to limit usage in flood risk areas that are appropriate to the level of flood risk;
- (iv) review and update the plan making justification tests (Justification Tests) for all lands proposed to be zoned in the draft Local Area Plan and to clearly demonstrate that all sites have been assessed against each of the sub criterion of part 2 of the Justification Test (box 4.1 of the Flood Guidelines);
- (v) ensure that a Justification Test is prepared for those lands zoned Community Services and Infrastructure immediately south east of Dillon Bridge and lands zoned Existing Residential between Willow Vale and the railway line to the north (to the east of the town); and
- (vi) in the event that all criteria of the Justification Tests referenced at (iv) and (v) above have not been satisfied, the draft Local Area Plan should be amended so that lands identified as at risk of flooding should not be zoned for highly vulnerable (Flood Zone A and B) or less vulnerable (Flood Zone A) uses.

## **7. Economy and employment**

While there is no employment land target in the County Development Plan for Carrick-on-Suir, the Serviced Land Assessment (appendix 1) has identified a requirement for 10.3 ha of employment land which includes headroom of 25%. While the quantum of

employment lands at 31.3 ha is high the Office considers that the approach taken is reasonable having regard to:

- the role of Carrick-on-Suir relative to the Waterford MASP area with respect to the provision of employment;
- the location and accessibility of the employment lands; and
- the established employment uses and the serviced nature of the employment lands, particularly on the larger site to the east, at Three Bridges/ Ballylynch.

The Office notes section 4.2.2 which recognises the importance of developing the Three Bridges/Ballylynch site in a phased and sequential manner with the requirement to prepare a masterplan for the entirety of the site which is also supported by Objective 8-D of the County Development Plan.

It would be preferable however if the key principles in relation to the phased development of these lands were set out in the draft Local Area Plan, particularly in relation to sustainable mobility and connections with existing and proposed walking and cycling routes in the town, and identifying key infrastructure constraints or requirements and the mechanisms by which these will be resolved.

Furthermore, the draft Local Area Plan should include an objective for the preparation of a masterplan for these lands and should set out details in relation to the masterplan preparation process, including who the masterplan will be prepared by, the timing of the masterplan (ie prior to or in parallel with any further planning application), and the details to be included in the masterplan to guide future development (including layout, massing, permeability, heights, materials etc).

#### **Recommendation 6 – Masterplan for employment lands**

Having regard to the provision of sustainable transport options, the co-ordination of land use zoning, infrastructure and services, and a plan-led approach to economic development, and in particular to:

- RPO 9 of the RSES prioritising the delivery of compact growth and sustainable mobility including in relation to sustainable travel and provision of services;



- RPO 26 of the RSES supporting coordination between the planning authority and infrastructure providers in towns and villages;
- RPO 62 of the RSES identifying future locations for strategic employment development having regard to accessibility by sustainable transport modes;
- section 3.6 of the RSES where a sustainable, infrastructure-led growth approach is encouraged at an appropriate scale; and
- Objective 8-D of the Tipperary County Development Plan 2022-2028 which supports a strong spatial framework for economic development, by developing Masterplans/ Frameworks for strategic landbanks,

the Planning Authority is required to:

- (i) set out the key principles in relation to the phased development of these lands in the draft Carrick-on-Suir Local Area Plan 2025-2031, particularly in relation to sustainable mobility and connections with existing and proposed walking and cycling routes in the town, and identify key infrastructure constraints or requirements and the mechanisms by which these will be resolved; and
- (ii) include an objective in section 4.4 to prepare a masterplan for Three Bridges and Ballylynch Business Parks. Details in relation to the masterplan preparation process should be clearly set out including who the masterplan will be prepared by, the timing of the masterplan (i.e. prior to or in parallel with any further planning application), and the details to be included in the masterplan to guide future development (including layout, massing, permeability, heights, materials etc).

## **8. Environment and built heritage**

The Office notes that the Natura Impact Report (appendix 9) includes a range of mitigation measures which have been integrated into the draft Local Area Plan to ensure that the draft Local Area Plan does not adversely affect the integrity of designated European sites. The Office commends the preparation of the ACA - Statement of Character and the strategy for the built and cultural heritage of Carrick-on-Suir which aligns with RPO 206 of the RSES. The Office notes in section 7.2.1 that a review of the

Record of Protected Structures for the town will be carried out, however, there is no corresponding objective to this effect in the draft Local Area Plan and no such objective is included in the County Development Plan.

The Office also notes that section 7.1.4 of the draft Local Area Plan recognises that there are trees within the Local Area Plan area that are considered significant landscape features and lists those trees within both the urban area and environs, however this has not been reflected in a specific objective.

### Observation 2 – Environment and built heritage

Having regard to the protection of our natural and built heritage, and in particular to:

- RPO 206 of the RSES to protect architectural heritage; and
- Policy 11-4 of the Tipperary County Development Plan 2022-2028 to conserve and protect areas of biodiversity value including trees,

the Planning Authority is requested to:

- (i) include an objective in section 7.3 to review and update as appropriate, the Record of Protected Structures as it relates to Carrick-on-Suir during the life of the plan; and
- (ii) include an objective to protect those trees as listed in section 7.1.4.

### Other matters

Below of other items of note which may contribute positively to the plan-making process and, as such, the Planning Authority may wish to consider:

- (i) redraft figure 6 of the draft Local Area Plan to make it clearer;
- (ii) redraft figure 17 Indicative Urban Cycle Network (appendix 2) to make it more clear;
- (iii) number each of the proposed interventions in table 11 of the draft Local Area Plan for ease of reference;
- (iv) relabel the Built Heritage Map to Built and Archaeological Heritage Map; and

(v) clearly outline the regeneration sites on map 1a (Land Use Zoning Map).

## Summary

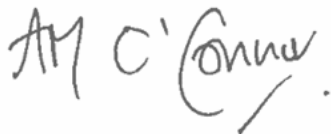
The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed.

Where your authority decides not to comply with the recommendations of the Office, made to the draft Local Area Plan, please outline the reasons for the decision in the Chief Executive's report.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

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**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations

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