



Comhairle Contae Thiobraid Árann
Tipperary County Council

Chief Executive Report

**Draft Carrick-on-Suir & Environs
Local Area Plan 2025 - 2031**

Tipperary County Council Planning Policy and Projects Unit
January 2025



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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 Carrick-on-Suir on 25 October 2024 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 Carrick-on-Suir Town Development Plan 2013 (as varied and extended).

The Draft LAP was made available for a period from 25 October 2024 to 9 December 2024 (6 weeks and 3 days) and submissions were invited from stakeholders and the public during this time. This report provides a summary of the 23 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.
 - The Town Centre First Plan is appended to Part 2 (to aid legibility of this document given its size)

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 26 January 2025¹.

¹ Ordinarily, this date would be 17 January 2025. However, Section 251 of the Planning and Development Act 2000 (as amended) sets out that the days between 25 December and 1 January inclusive should be disregarded for the purposes of calculating statutory time limits.

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 from 25 October 2024 to 9 December 2024. 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 Wednesday 13 November 2024 at the Carrick-on-Suir Library.
- The Public Participation Network (PPN) circulated details of the process to their members;
- Targeted letters (emails) 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

23 submissions were received within the statutory consultation period. These are listed in Section 2. All submissions received are summarised in Section 2 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 Report, 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 10 February 2025.

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 Carrick-on-Suir Municipal District on 23 January 2025 to facilitate consideration of this report and recommendations contained therein. The matter will be brought before the Elected Members at the Plenary Meeting on 10 February 2025.

As material alterations 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 Proposed Material Alterations to the Draft LAP would take place from Friday 28 February until Monday 31 March 2025, if agreed. This is subject to proposed material alterations being 'screened out' for 'Strategic Environmental Assessment' and 'Appropriate Assessment' i.e. that the local authority does not consider that one or more of the proposed material alterations requires a full 'Strategic Environmental Assessment' or 'Appropriate Assessment'.

2.0 Submissions Received

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

No.	Name	Submission Type
19.	Office of the Planning Regulator (OPR)	<u>Statutory Consultees, State Bodies and other Government Departments (13)</u>
1.	Environmental Protection Agency (EPA), SEA Section	
3.	Department of Transport (DoT)	
4.	Transport Infrastructure Ireland (TII)	
5.	Waterford City and County Council	
8.	Maritime Area Regulatory Authority	
9.	Uisce Éireann (UE)	
11.	Office of Public Works (OPW)	
13.	Department of Education (DoE)	
14.	Department of Environment, Climate and Communications (DoECC)	
15.	Department of Housing, Local Government & Heritage (DoHLGH)	
18.	National Transport Authority (NTA)	
22.	Gas Networks Ireland (GNI)	
7.	Cllr David Dunne & Cllr Kieran Bourke	<u>Local bodies (4)</u>
10.	Tony Musiol on behalf of Carrick-on-Suir Tourism & Economic Development Committee (COSTEDC)	
12.	Tony Musiol on behalf of Carrick-on-Suir Tourism & Economic Development Committee (COSTEDC)	
20.	Niall Walsh on behalf of Carrick-on-Suir Development Association	
6.	Thomas Downey on behalf of land owners of former Mart Site.	<u>Zoning Related Submissions (2)</u>
23.	Conroy Architects on behalf of JSF Construction Limited	
2.	Gemma Denny	<u>Individual Submissions (4)</u>

16.	Cllr David Dunne	
17.	Muirenn Duffy, RMLA on behalf of Tesco Ireland Limited	
21.	Gerard Butler	

2.1 Statutory Consultees, State Bodies and Government Departments

Submission Number: 19	Submission Name: Office of the Planning Regulator (OPR)
Submission Summary: <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 particularly strong on climate action mitigation and adaptation. The OPR welcomes the focus on the consolidation and regeneration of Carrick-on-Suir. The Office strongly commends the identification of masterplan-led developments for both residential and employment lands.</p> <p>Six recommendations and two observations were identified in the submission under the following headings.</p> <p><u>1. Consistency with Tipperary County Development Plan 2022-2028</u></p> <p>The office is satisfied that all the lands to be zoned New Residential are well located, contiguous to the existing built up footprint, within the CSO settlement boundary and are consistent with RPO 35 of the RSES in relation to compact growth.</p> <p>The OPR notes that the policy approach to the Strategic Reserve is not clear in relation to the inconsistency between section 2.4.3 and table 12 Land Use Zoning Objectives. The future development of the N24 should be protected at these lands and the draft LAP should clarify that development on lands identified as Strategic Reserve will not be considered.</p> <p><u>Recommendation 1 – Strategic Reserve Lands</u></p> <p>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:</p> <ul style="list-style-type: none">• 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-Suir 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.

2. Compact Growth and Regeneration

The Office notes that the draft LAP references a density of 15uph for lands zoned New Residential which aligns with the density applied in the County Development Plan. The Office acknowledges 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 national, regional policy, the local policy intention should be to seek higher densities at certain locations across the plan area, where appropriate and where site context is suitable.

Recommendation 2 – Compact growth and regeneration

Having regard to the compact and sustainable growth of Carrick-on-Suir and continued planned 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 Guideline) to achieve higher densities at appropriate locations; and
- Policy 4-1 of the Tipperary County Development Plan 2022-2028 which will apply as an appropriate density for new residential development in line with section 28 Guidelines, of the Development Plan,

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. Masterplan to north of Coolnamuck Road

The draft Local Area Plan includes Policy 5.2 to prepare a masterplan for the 6.22 ha site at Carrickbeg to the north of Coolnamuck Road. 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

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.

The Office commends Objective 6C and Objective 6D, with respect to collaboration with Irish Rail and the NTA to improve the rail and bus service in the town.

Noting that a number of residential estates laid out in a cul-de-sac typology with poor connectivity, the Office recommends that map 1 of appendix 2 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.

To ensure consistency between the draft Local Area Plan and the County Development plan the Office recommends that Policy 6.9 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).

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

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.

The Office recommends that the draft Local Area Plan 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 (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).

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 the Natura Impact Proport (appendix 9) includes a range of mitigation measures which have been integrated into the draft LAP. The Office commends the preparation of the ACA - Statement of Character and the strategy for the built and cultural heritage of Carrick-on-Suir. 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 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

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 clearer;
- (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).

Consideration:**Recommendation 1 – Strategic Reserve Lands**

Submission made with regard to lands zoned Strategic Reserve is considered to be fair, as the purpose of these lands should be unambiguous. The intent of the LAP is to ensure piecemeal development does not occur on these lands, and these lands will be available for development in the future. Section 2.4.3 of the Draft LAP will be amended to ensure no development will take place on these lands within the lifetime of the Plan.

Recommendation 2 – Compact growth and regeneration

It is considered appropriate that centrally-located development sites would achieve higher densities to avail of infrastructure and services available in close proximity to the town centre. Four identified regeneration sites (Regeneration sites 1, 2, 3 & 5) are located on lands zoned 'Urban Core' and these sites could support residential development. Appendix 3 of the LAP will be amended to provide clarity and require these sites to provide a focus on higher density and high-quality urban housing.

Recommendation 3 – Masterplan to north of Coolnamuck Road

The points in relation to the development of Coolnamuck Road lands are noted and reasonable. It is considered appropriate to provide further guidance on the development of these lands to ensure a cohesive and sustainable development response to the lands. It is proposed to amend the section titled "2. Carrickbeg" under section 5.1 of the Draft LAP to provide further clarity on the development of these lands in a cohesive and consistent form. With regard to massing, building heights and materiality, it is considered that these issues are most appropriately dealt with through a detailed assessment that would be undertaken in the development of the masterplan, rather than being specific at the Plan-making stage. It is further proposed to amend Policy 5.2 of the Draft LAP to give policy effect to these changes.

Observation 1 – Amenity and recreation

This is noted and accepted. An additional objective to be included.

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

With regard to Point (i) of this recommendation, it is agreed that sustainable transport east-west connections are a critical element in the delivery of a cohesive and sustainable transport system for the town. To achieve this objective, a number of sustainable transport measures have been included in the town and future regeneration plans for the town. Cycle lanes are already in place at the western and eastern ends of the N24 and these routes will be connected by: (i) a reduction in speeds on vehicular routes through the urban core from 50 to 30kph; (ii)

new offline sustainable transport route from the N24, south of Ormond Castle and into the urban core and (iii) improved cycle and pedestrian environment throughout the urban core and along the quays. These linkages provide, and will provide, a high-quality walking and cycle route for access into the urban core. These projects are already delivered, or fully funded and being delivered, and are considered preferable to a dedicated cycle lane along the N24 which is likely to take a much longer timeframe to deliver, and may not be achievable at all.

Point (ii) of this recommendation is noted. However, it is considered that there is sufficient policy enforcement included in the plan to ensure that opportunities for improving permeability in existing estates are realised and availed of, and that future development will be required to ensure connections and permeability are included in design. For clarity, Map 1 showing permeability measures in the Sustainable Travel Plan (Appendix 2) will be referenced in Objective 6G.

With regard to point (iii) of this recommendation, though it is considered that this issue is already addressed in s28 guidelines, for completeness and clarity it is proposed to amend Policy 6.9 to provide cross-reference with Policy 12 – 4 of the Tipperary County Development Plan 2022-2028.

Recommendation 5 – Flood risk management

Point (i) of this recommendation is noted. Section 4.2.1 of the SFRA will be amended to reflect the consideration of PFRA pluvial mapping. However, as per the OPW submission, it is not appropriate to map flooding from pluvial sources through a national scale assessment. These mapping resources will not therefore be used to inform land use zoning maps.

Point (ii) of this recommendation is noted. However, is it considered that the flood zone data is clear. Digital datasets will be shared with the OPR to avoid confusion. Final maps will be provided in high resolution to ensure users can zoom in and clearly see Flood Zone B.

Point (iii) is noted. However, is it considered that the following paragraph, already included on page 85 of the written statement addresses this issue:

“Note on Land Use Zoning Objectives and Matrix:

The limitation described in this note applies to a relatively small number of instances where Flood Risk Zones A and B overlap with certain Land Use Zoning objectives. Uses under all Land Use Zoning Objectives (apart from where the Justification Test outlined in the Flood Risk Management Plan has been passed) shall be limited to water-compatible uses in Flood Zone

A, and less vulnerable or water compatible uses in Flood Zone B (as per the Flood Risk Management Guidelines), and detailed site-specific Flood Risk Assessment will be required in these areas. This limitation shall take primacy over any other provision relating to these land use zoning objectives.”

Point (iv) is noted and accepted. Justifications Tests for the identified lands will be updated and amended.

Point (v) is noted and accepted. Justifications Tests for the identified lands will be provided.

Point (vi) is noted. The Draft LAP land use zoning maps will be updated.

Recommendation 6 – Masterplan for employment lands

This landbank has a number of land owners, and requiring the development of a masterplan for these lands would be likely to stymie the natural expansion of small-scale business and employment in this location. Nonetheless, given the scale of the landbank available for employment at the three Bridges and Ballylynch Business Park, it is reasonable that a framework for the future development of these lands is set out in the LAP. Section 4.2.2 of the LAP will be updated to provide further clarity on the development of these lands in a cohesive and consistent form. Policy 4.3 of the Draft LAP already gives effect to the requirement to comply with the principles of development set out in Section 4.2 for each of the ‘Strategic Employment Sites’.

Observation 2 – Environment and built heritage

Points (i) and (ii) are noted and accepted. An additional objective will be included requiring a review of the RPS for Carrick-on-Suir and a policy added to ensure the protection of trees referenced in section 7.1.4.

Other matters

- Point (i) is accepted. Figure 6 will be given a full page to make this clearer
- Point (ii) is noted. However, this is a reproduced image, produced originally by AECOM. If possible, this will be updated in the Final LAP.
- Point (iii) is noted and accepted. Table 11 to be updated with references.
- Point (iv) is noted and accepted and map to relabelled as ‘Built Heritage and Archaeology’
- Point (v) is noted. However, these Regeneration Sites are already cleared marked in the ‘Town Centre and Regeneration’ map. Including these sites on the ‘Land Use

Zoning’ map would unduly clutter this map, and is not considered necessary as these sites are already mapped. To provide clarity, it is considered appropriate to relabel the map as ‘Town Centre and Regeneration Sites’.

Recommendation:

1. Amend Section 2.4.3 of the Draft LAP to remove any ambiguity around the development of lands zoned ‘Strategic Reserve’ (see Amendment 2 in Part 2)
2. Amend Appendix 3 – Regeneration Sites insofar as it relates to Sites 1, 2, 3 & 5 to provide clarity and require these sites to provide a focus on higher density and high-quality urban housing (see Amendments 53, 54, 55 & 57 in Part 2).
3. Amend the section “2. Carrickbeg” at section 5.1 of the Draft LAP to provide further detail on layout, access, connections, permeability and form (see Amendment 21 in Part 2)
4. Amend Policy 5.2 of the Draft LAP to give policy effect to the proposed changes outlined in section 5.1 (see Amendment 23 in Part 2)
5. Amend Section 5.6 to of the Draft LAP to provide an additional objective relating to playgrounds in the Clairin and Green Hill Village areas. (see Amendment 25 in Part 2)
6. Amend Policy 6.8 (policy reference number also updated) of the Draft LAP to provide cross-reference with Policy 12 – 4 of the Tipperary County Development Plan 2022-2028. (see Amendment 30 in Part 2)
7. Amend Objective 6G of the Draft LAP to refer to Map 1 of Appendix 2 Sustainable Transport Plan (see Amendment 31 in Part 2)
8. Amend Section 4.2.1 of the SFRA to reference the consideration of Preliminary Flood Risk Assessment pluvial mapping (See Amendment 60 in Part 2)
9. Amend Appendix F of Appendix 10: SFRA to amend the Justifications Tests (see Amendment 65 in Part 2)
10. Amend Appendix F of Appendix 10: SFRA to add Justifications Tests for sites adjacent to Dillon Bridge and Willow Vale (see Amendment 65 in Part 2)
11. Amend Section 2.6 of Appendix 10: SFRA to cross reference to the Note on Land Use Zoning Objectives (see Amendment 64 in Part 2)
12. Amend Map 1A ‘Land Use Zoning’ insofar as it relates to the ‘Social and Community Infrastructure’ use to change to ‘Open Space and Recreation’ to the south of Dillon Bridge (see Amendment 68 in Part 2).
13. Amend Section 4.2.2 of the Draft LAP to provide further clarity on the development of the Three Bridge and Ballylynch Business Park in a cohesive and consistent form. (see Amendment 12 in Part 2)

14. Amend Section 7.3 to add Policy 7.13 to ensure protection of trees referenced in section 7.1.4 (see Amendment 34 in Part 2)
15. Amend Section 7.3 to add Objective 7G to require the review of the Record of Protected Structures in Carrick-on-Suir (see Amendment 35 in Part 2)
16. Update Table 11 of the Draft Plan to provide individual reference numbers for each specific project (see Amendment 28 in Part 2)
17. Update 'Built Heritage' Map to relabel as 'Built Heritage and Archaeology' Map (see Amendment 70 in Part 2)
18. Update 'Town Centre and Regeneration' Map to relabel as 'Town Centre and Regeneration Sites' (see Amendment 71 in Part 2)

Submission Number:	Submission Name:
1	Environmental Protection Agency (EPA), SEA Section
<p>Submission Summary:</p> <p>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 key recommendations of guidance document “<i>SEA of Local Authority Land Use Plans - EPA Recommendations and Resources, 2024 (Version 1.24)</i>” are considered in finalising the LAP.</p> <p>The submission advises that the Council ensure the LAP aligns with key 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).</p> <p>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.</p> <p>The submission recommends that:</p> <ul style="list-style-type: none"> • Ireland’s State of the Environment Report 2024 (EPA,2024) is considered and integrated as appropriate in 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. <p>Environmental authorities who should be consulted are listed.</p>	

Consideration:

The points made in the submission are noted.

The 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been considered in the preparation of this SEA Scoping Report and will be considered throughout the SEA process.

The SEA will seek to ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region.

Content of the Environmental Report

The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the Regulations.

Assessment of Alternatives

The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under "Assessment of Alternatives" - refer to Sections 6 of the SEA Environmental Report.

Assessment of Environmental Effects

Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under "Evaluation of the Environmental Effects of Plan Implementation" - refer to Section 7 of the SEA Environmental Report.

Mitigation Measures

Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under "Mitigation Measures" - refer to Section 8 of the SEA Environmental Report. The Plan mitigation measures have been integrated into the Plan.

Monitoring

Noted. The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the submission under

“Monitoring Measures” - refer to Section 10 of the SEA Environmental Report. The Plan mitigation measures have been integrated into the Plan.

Ireland’s State of the Environment Report 2024

The report was not published prior to the preparation of the Plan, although the publication was anticipated and noted in the SEA Environmental Report. The recommendations, key issues and challenges described in the EPA’s State of the Environment Report – Ireland’s Environment 2020 have been considered during the preparation of the Plan and undertaking of the SEA. The most recent report will be considered during further stages of environmental assessment of amendments to the plan.

Future Amendments to the Plan

Any future amendments will be screened for likely significant effects as required.

SEA Statement – “Information on the Decision”

An SEA Statement will be prepared including the required information and taking into account the EPA guidance on SEA Statements.

Environmental Authorities

The relevant environmental authorities have been consulted with as part of the Plan preparation/SEA process.

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

Recommendation:

No changes to the Draft LAP recommended.

Submission Number:	Submission Name:
3	Department of Transport (DoT)
Submission Summary:	
<p>The Department of Transport welcomes a number of key transport policies in Appendix 2: Sustainable Transport Plan of the Draft Carrick-on-Suir LAP. The submission lists the following key policies and strategies to support <i>Accessible public transport for All, and especially for Persons with Disabilities, Reduced mobility and Older People.</i></p> <ul style="list-style-type: none">• 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.	

- The UN Convention on the Rights of Persons with Disabilities (UNCRPD) 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. DoT welcomes the Draft LAP text supporting Carrick-on-Suir as an Age Friendly Town.
- 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 Sustainable Mobility Policy sets out a strategic framework to 2030 with specific actions to improve and expand sustainable mobility.
- DMURS Interim advice Note – Covid 19 Pandemic Response (2020) includes guidance on accessibility.
- The Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity particularly for people living outside major cities and towns.

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

Consideration:

The submission is noted. To support sustainable mobility, further reference to ‘Universal Design’ and ‘Whole Journey Approach’ should be included within the Draft LAP.

Recommendation:

1. Amend Section 6.1 to refer to ‘Universal Design’ and ‘Whole Journey Approach’ (see Amendment 26 in Part 2).

Submission Number:	Submission Name:
4	Transport Infrastructure Ireland (TII)
Submission Summary: <p>Pending delivery of the NDP N24 Waterford to Cahir Scheme, safeguarding the function and capacity of the existing N24 strategic route remains a critical consideration.</p> <p><u>Development Strategy and National Roads</u></p> <p>Welcome Section 6.5 and Policy 6.9 of the Draft LAP which supports the National Strategic Outcome (NSO) 2 of the National Planning Framework and Regional Planning Objective RPO 140 of the Regional Spatial and Economic Strategy (RSES).</p>	

The following addition to Policy 6.9 is recommended to ensure conformance with the NPO 74/ NSO2 and RPO 140:

‘The policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply’.

Local Area Plan / Local Transport Plan Integration

TII supports the preparation of the Sustainable Transport Plan and acknowledges the clarification provided in Section 5.2.1 of the Sustainable Transport Plan outlining that ‘proposed measures do not encroach on the strategic national road network’. TII would welcome following inclusions in the Sustainable Transport Plan:

- TII would welcome a reference to the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) within Section 2.1.
- In Section 2.3 ‘Guidance Documents’ include reference to TII Publication ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ (TII Publications DN-GEO-03084), TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).
- TII would also welcome Policy 6.3 of the Local Area Plan updated to reflect the requirement to apply TII Publications to works to national roads in the urban area, complementary to DMURS.
- Consider inclusion of reference to the National Cycle Network Plan (DoT, 2023) in the Sustainable Transport Plan and to consult with the Councils greenway and active travel teams to ensure relevant projects are identified for inclusion in the Local Area Plan prior to finalisation.

Specific Local Area Plan Objectives

1) N24 Waterford to Cahir Scheme

In TII’s opinion clarification is required in relation to zoning objective proposals impacting the N24 Waterford to Cahir Scheme. TII acknowledges inclusion of policy 6F and objective 6B. TII refers to Section 2.9 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). TII recommends against including zoning objectives in the Land Use Zoning map underlying the N24 Waterford to Cahir Scheme.

2) Proposed ‘Town Environs’ Zoning Objective

TII notes the proposed 'Town Environs' zoning objective to the east and west of Carrick-on-Suir adjoining the N24 where a 100kph speed limit applies and notes that new single dwellings may be facilitated within this zoning designation. TII has concerns on the potential of proposed development applications to impact the national road network contrary to official policy. Therefore to provide guidance to perspective applicants, TII recommends the inclusion in the Draft LAP of a cross reference of Policy 6.9 of the LAP to Policy 12-4 of the Tipperary County Development Plan 2022-2028.

Maintaining the Strategic Capacity and Safety of the National Road Network

TII acknowledges and welcomes the reference in section 6.5 of the Draft Plan to TII publications and the requirements for Road Safety Audits for any development proposals that result in a permanent change to the layout of a national road.

TII welcomes Objective 6F of the Draft LAP to TII publications and the requirements for Road Safety Audits for any development proposals that result in a permanent change to the layout of a national road.

TII would welcome the following objective to be included in the Plan: 'The capacity and efficiency of the national road network drainage regimes in Tipperary will be safeguarded for national road drainage purposes'.

TII would welcome an objective being included in the Plan in relation to accommodating grid connection. To safeguard the national road network where grid connection cable routing is required to service renewable energy development available alternatives should be utilised as opposed to being placed along the strategic national road network.

TII notes official policy which requires development proposals where noise sensitive uses are introduced in the environs of existing or planned national roads, the cost of implementing mitigation measures shall be borne by the developer. TII requests that the Plan refer to the requirements of SI No 400 of 2006 Environmental Noise Regulations.

TII request reference statutory instrument SI140 of 2006 with regard to environmental noise is included in the Plan.

Other Matters

In relation to Greenway proposals, consultation with the Councils own internal project and/or design staff is recommended.

Consideration:Development Strategy and National Roads

Noted. In relation to the suggested additional wording in Policy 6.9, compliance with the policy is already set out under Policy 12-4 of the TCDP 2022-2028 which is applicable to the LAP.

Local Area Plan / Local Transport Plan Integration

These points are noted.

The recommendations to include the Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) and the National Cycle Network Plan within section 2.1 of Appendix 2 is acknowledged. The TII publications as listed above are referenced in Section 6.5 of the Draft LAP.

In relation to the request to update Policy 6.3 to reflect requirements to apply TII Publications, this is covered already within Policy 6.9 and listed within Section 6.5 of the draft LAP. The point made regarding the National Cycle Network Plan (DoT, 2023) is welcomed and will be actioned.

Specific Local Area Plan Objectives*N24 Waterford to Cahir Scheme.*

The support for Policy 6F and Objective 6B is noted and welcomed. Comments in relation to land use zoning and the N24 route are noted. However, Policy 6.5 of the Draft LAP, together with Policy 12 – 3 of the TCDP provides extensive protection for the route corridor of the N24 to ensure inappropriate development would not occur in these areas that would prejudice the delivery of the N24 project.

In response to the Recommendation 1 from the Office of the Planning Regulator (submission no.19 above), the Council can confirm that Strategic Reserve lands are designated for long-term strategic and sustainable development sites that may deliver housing within the subsequent plan period. The Draft LAP will be amended to ensure the absence of ambiguity in this regard (see Amendment 2 in Part 2).

Proposed ‘Town Environs’ Zoning Objective.

As noted, Policy 12-4 of the TCDP 2022-2028 addresses development and impacts in the national road network at locations outside of the urban speed limit. The Policy is applicable under the LAP and will be cross referenced in the LAP to address the concern raised.

Maintaining the Strategic Capacity and Safety of the National Road Network

These points are noted. Compliance with most of the standards or guidelines referenced is a prerequisite for all development proposal in any event and there would be no practical effect of inclusion of these references, objectives or policies whilst making the Plan longer, more technical and difficult for users to read.

Policy 12-8 of the TCDP 2022-2028 provides for the safeguarding of national road drainage purposes. These provisions apply to the LAP also.

With regard to grid connections for renewable energy projects, it is considered that there are already adequate safeguards within the Draft LAP and TCDP with regard to strategic infrastructure. Further policies seeking to limit the options for grid connections for renewable energy developments would be inconsistent with a wide range of climate positive policies included in this plan and higher order plans.

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. These policies and sections are applicable to all areas within the Carrick-on-Suir LAP.

Other Matters

We can confirm that the Active Travel Team within Tipperary County Council were, responsible for the delivery of greenways, were consulted as part of developing the draft Local Area Plan.

Recommendation:

1. Update Section 2.1 of Appendix 2 Sustainable Transport Plan to include a reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and the National Cycle Network Plan (DoT, 2023) (see Amendment 47 and 49 in Part 2);
2. Amend Policy 6.8 (policy reference number also updated) to include a cross reference to Policy 12-4 of the TCDP 2022-2028) (see Amendment 30 in Part 2); - See submission 19 above.

Submission Number: 5	Submission Name: Waterford City and County Council
Submission Summary: <u>Roads Strategy</u>	

WCC acknowledges the reference to the objective in the Draft LAP to reserve a corridor for a new river crossing in Carrick-on-Suir. WCC notes that it is important that both Authorities recognise the need to preserve a portion of land to accommodate a third river crossing should the need arise.

Zoning

WCC notes that the majority of lands bordering Waterford County are zoned 'Town Environs' which corresponds to the 'High Amenity' zoning on the lands to the Waterford side of the county boundary. WCC welcomes this zoning to provide protection to the environmental quality south of Carrick-on-Suir.

Blue Green Infrastructure

WCC welcomes the proposals to support sustainable travel and in particular the delivery of connection from the Suir Blueway to the Waterford Greenway.

Consideration:

These comments are noted. Tipperary County Council is committed to liaising and working with neighbouring planning authorities on planning and delivery of relevant projects.

In the absence of funding strategy for the third river crossing, it is considered inappropriate to reserve a corridor of land.

Recommendation:

No changes recommended to the Draft LAP.

Submission Number:	Submission Name:
8	Maritime Area Regulatory Authority (MARA)
Submission Summary:	
MARA's functions are set out under the Maritime Area Planning Act 2021 and extent to the entire maritime area. MARA note that the maritime area extends along the River Suir westwards from Carrick-on-Suir.	
MARA recommends that the Draft LAP and associated environmental assessments have regard to the objectives of the National Marine Planning Framework (NMPF). MARA notes that the Ireland has a total of 25 legally binding environmental targets towards achieving and maintaining Good Environmental Status (GES) under the Marine Strategy Framework Directive.	

MARA notes a number of policies in the Draft Plan relating to blueways and river crossings and river related projects which may require Maritime Usage Licence (MUL) or Maritime Area Consent (MAC) prior to seeking planning permission.

Consideration:

The submission is welcomed and noted. The points made regarding the functions of MARA including considering and granting Maritime Area Consent and Licence applications are acknowledged, and Section 7.1.2 of the Draft Plan will be updated to acknowledge this points. A Strategic Environmental Assessment (SEA) has been prepared in respect of the Draft LAP in accordance with the above referenced legislation and the NMPF.

Recommendation:

1. Amend Section 7.1.2 relating to development in the nearshore and the statutory function of MARA. (see Amendment 32 in Part 2)

Submission Number:

9

Submission Name:

Uisce Éireann (UE)

Submission Summary

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

Sustainable Drainage and Green-Blue Infrastructure

Uisce Éireann encourages objectives and initiatives supporting the implementation of Sustainable Drainage Systems (SuDS) and the enhancement of green and blue infrastructure.

Reference to the following documents could be included in the Draft LAP: Department of Housing, Local Government and Heritage's (DHLG) Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document (2022); Nature Based Management of Urban Rainwater and Urban Surface Water Discharges - A National Strategy (2024); the Design Manual for Urban Roads and Streets' Advice Note 5: Road, and Street Drainage using Nature Based Solutions Design (2023); and the National Transport Authority's Greening and Nature-based SuDS for Active Travel Schemes (2023).

Planned Road and Public Realm Projects

Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.

Zoning

Available network information indicates localised network extensions may be required to service some zoned sites. Depending on the extent of development realised, 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.

There are several large landbanks in the town that would benefit from masterplanning so that sequential connections to water supply and wastewater infrastructure can be undertaken in the most efficient manner, this is particularly relevant for Residential Sites no. 1, 5, 7, 9, 10. In particular, servicing of Sites 7, 8 and 9 from a water services perspective would require detailed masterplanning and development on a phased basis, and would potentially require significant upgrades.

Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.

Uisce Éireann assets (which run through a number of zoned sites), need to be protected or diverted. If there is a possibility that Uisce Éireann assets will need to be altered or diverted because of a proposed development, a diversion agreement may be required.

It appears that in the Service Land Assessment, Residential Site no. 2 and Employment Site no. 1 are the same site – the zoning type for this site should be clarified.

Wastewater Infrastructure

The latest Wastewater Capacity Register is June 2023. The Carrick-on-Suir Wastewater Treatment Plant currently has capacity to cater for the growth identified in the Draft LAP. It is envisaged that capacity is available in the wastewater networks in the town. Local network upgrades would need to be delivered in some areas to provide capacity to individual sites; these can be customer driven/funded.

Water Supply Infrastructure

The latest Water Supply Capacity Register is June 2023. Carrick-on-Suir is served by the Carrick-on-Suir Water Resource Zone (WRZ). Currently it is envisaged that there is potential spare capacity available in the Carrick-on-Suir WRZ. Some capacity constraints exist however, and connection applications will be assessed on an individual basis considering their specific load requirements. It is envisaged that capacity is available in the main networks supplying the town. Local network upgrades would need to be delivered to provide capacity to individual sites, these can be customer driven/funded.

Other Comments and Suggestions on the Draft LAP Text

Chapter 5. Sustainable Communities - Uisce Éireann welcomes the intention to prepare a comprehensive masterplan for the lands at Coolnamuck Road. There are other large landbanks that would also benefit from masterplanning so that sequential connections to water supply and wastewater infrastructure can be undertaken e.g. New Residential and Strategic Reserve site 7, and New Residential site 8.

Section 8.2.1: Carrick-on-Suir Public Water Supply – Recommends that this section be updated, suggested text as follows:

Uisce Éireann publishes Water Supply Capacity Registers annually for each county. The latest capacity register for the county was published in June 2023 and indicates that the Carrick-on-Suir Water Resource Zone (WRZ) has potential spare capacity available. Some capacity constraints exist however, and connection applications will be assessed on an individual basis considering their specific load requirements.

Section 8.2.2: Carrick-on-Suir Public Wastewater System - Recommends that this section be updated, suggested text as follows:

...Uisce Éireann publishes Wastewater Capacity Registers annually for each county. The latest capacity register for the county was published in June 2023 and indicates that the Carrick-on-Suir Wastewater Treatment Plant (WWTP)...

Section 8.3: Sustainable Surface Water Management - Uisce Éireann wish to clarify that the discharge of additional surface water to combined (foul and surface water) sewers is not permitted and note that the responsibility for the stormwater network (stormwater/surface water sewers) lies with the local authority.

Policy 8.2 – Recommends that this policy be updated, suggested text as follows:

Support the sustainable and efficient use of existing capacity in water service; permit new connections to the Carrick-on-Suir public water and waste water supply; and safeguard the integrity of the water supply and waste water network. Where local network upgrades are required, to ensure that capacity is provided to individual sites in accordance with the

Uisce Éireann Connections Charging Policy and Uisce Éireann's Connections and Developer Service process.

Uisce Éireann notes that new connection applications to the public water and wastewater infrastructure should be submitted directly to Uisce Éireann – details are provided on our website and in Section 1.1 above

Policy 8.3 – This policy is welcomed and notes that there are other guidance documents of relevance.

Chapter 9. Land use Zoning Framework (Zoning Matrix) – Requests that water services infrastructure be included in the zoning matrix as 'permitted in principle' or 'open for consideration' across all land uses.

Environmental Reports and Serviced Land Assessment – The contents of this submission should be taken account of in the Environmental Reports and Serviced Land Assessment.

Consideration:

Sustainable Drainage and Green-Blue Infrastructure

Noted. Reference to the suite of guidance documents will be included in the LAP.

Planned Road and Public Realm Projects

Noted.

Zoning

Noted. The proposed residential zoned landbanks on the Coolnamuck Road and north of the rail station will be subject to masterplanning, as discussed, and considered in Submission No. 19 – also see Amendments 20 & 23 in Part 2. Comments in relation to lands at other large-scale land banks are noted, and constraints on water supply in this location are noted. Some of the identified lands will be zoned Strategic Reserve, whereby development will not occur within the lifetime of this Plan. Nonetheless, it considered appropriate where large-scale residential development is proposed, a cohesive approach to land development and infrastructure should be adopted. Section 5.1 will be amended to reflect this requirement.

The Former Mart Site was considered as part of the Residential Serviced Land Assessment (Site No. 2) and the Employment Serviced Land Assessment (Site No. 1). Both SLA's

determined that this site be zoned 'Regeneration' and this is reflected on the Draft LAP zoning map.

Wastewater Infrastructure

Noted.

Water Supply Infrastructure

Noted.

Other Comments and Suggestions on the Draft LAP Text

Noted. Mastepanning is discussed earlier in this response and in Submission No. 19.

Section 8.2.1 (Carrick-on-Suir Public Water Supply) will be updated with suggested text.

Section 8.2.2: (Carrick-on-Suir Public Wastewater System) will be updated with suggested text.

Section 8.3 (Sustainable Surface Water Management) will be updated to clarify that the responsibility for the stormwater network (stormwater/surface water sewers) lies with the local authority.

Policy 8.2 will be updated with suggested text.

There are sufficient policies in the Draft LAP and Tipperary County Development Plan supporting water services infrastructure and it is not required to be included in the zoning matrix.

Commentary will be provided through Screening for SEA and AA, and full assessments as necessary, if specific proposed material alterations emerge as a result of this submission.

Recommendation:

1. Amend Section 8.3 to include reference to the Design Manual for Urban Roads and Streets' Advice Note 5: Road, and Street Drainage using Nature Based Solutions Design (2023); and the National Transport Authority's Greening and Nature-based SuDS for Active Travel Schemes (2023). (See Amendment 40 in Part 2).
2. Amend Section 5.1 of the Draft Plan to make it clear that large-scale residential development must adopt a cohesive approach to land development and infrastructure. (See Amendment 19 in Part 2).

3. Amend Section 8.2.1 (Carrick-on-Suir Public Water Supply) to refer to the Uisce Éireann Water Supply Capacity Register. (See Amendment 37 in Part 2).
4. Amend Section 8.2.2: (Carrick-on-Suir Public Wastewater System) to correct typological errors. (See Amendment 39 in Part 2).
5. Amend Section 8.3 to clarify that the responsibility for the stormwater network (stormwater/surface water sewers) lies with the local authority. (See Amendment 40 in Part 2).
6. Amend Policy 8.2 to correct typological errors and to detail that new connection applications to the public water and wastewater infrastructure should be submitted directly to Uisce Eireann. (See Amendment 41 in Part 2).

Submission Number: 11	Submission Name: Office of Public Works (OPW)
Submission Summary: <u>Introduction</u> <ul style="list-style-type: none"> • This submission is made specifically concerning flood risk management. • The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes: The commitment to managing flood risk in line with the Guidelines as set out in Policy 8.4; Policy 8.3 and Objective 8C in relation to integrating SuDS and nature-based solutions into all development proposals. <u>Mapping Datasets</u> <ul style="list-style-type: none"> • Section 4.2 of the SFRA contains discussion on primary sources of flood risk information used to inform the SFRA. Table 4.1 references PFRA mapping, noting that it has not been used for Flood Zone Mapping. While it is correct that indicative flood mapping datasets such as PFRA fluvial, groundwater, and ICPSS have been superseded, PFRA pluvial mapping has not been superseded. It is not intended to update this dataset, as it is not appropriate to map flooding from pluvial sources through a national scale assessment, and pluvial datasets are more robust if produced at the community / local scale. <u>Consideration of Climate Change</u> <ul style="list-style-type: none"> • The OPW welcomes the discussion on climate change adaptation in section 3.8 of the SFRA. 	

- The minimum design level requirements for fluvial flooding set out in Table 6.4 of the SFRA are welcomed, it might be beneficial if this were supported by a policy objective, (e.g. if Policy 8.4 part (d) made specific reference to this table).
- Sections 3.8, 6.6.1 and 7.2 of the SFRA – OPW wish to clarify that the OPW are not in the process of transitioning to regional based climate models, and the guidance in the 2019 Flood Risk Management Climate Change Sectoral Adaptation Plan is still applicable.

Flood Risk Assessments

- The OPW welcomes the requirement as set out in section 6.2 of the SFRA that *“In order to ensure that flood risk is considered at an early stage to protect future development and increase flood resilience and sustainability, when assessing development proposals under the development management process, all development is subject to Stage 1 Flood Risk Identification / flood risk screening as a minimum to establish the need or otherwise for further flood risk assessment. Where a source and pathway for flood risk is identified then further assessment in the form of a Stage 2 FRA (or dependent on the nature of the flood source and pathway, Stage 3 FRA) will be required.”* Tipperary County Council might consider supporting this requirement via a policy objective.

Sustainable Drainage Systems (SuDS)

- The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites.
- The Guidelines also recommend that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Town Environs

- The OPW welcomes the Note on Land Use Zoning Objectives and Matrix in the draft Plan, which outlines that uses shall be limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B, except where a Justification Test has been satisfied. This will ensure that inappropriate development will not be permitted in zonings such as Town Environs where a Justification Test would not be appropriate as the zoning cannot satisfy Criteria 2 of the Test.

Justification Tests

- The OPW welcomes the provision of plan making justification tests in the draft plan. It has not however been demonstrated how each sub criterion of part 2 of the Plan Making Justification Test has been satisfied.

- In certain cases where lands are already developed, it may be appropriate to retain a zoning to reflect existing usage, even though not all criteria of the Justification Test have been satisfied. In such cases, it should be noted that the Justification Test has not been satisfied, and that further inappropriate development in Flood Zones A or B will be limited via the note on the Land Use Zoning Objectives and Matrix, and Policy 8.4.
- Where undeveloped lands on which flood risk has been identified have not satisfied all criteria of the test, the sequential approach as set out in the Guidelines should be followed and zoning of such lands for inappropriate usage should be avoided, or a usage appropriate to the level of flood risk should be substituted.
- Part 3 of the Plan Making Justification Test as set out in the Guidelines outlines that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely, that flood risk can be adequately managed and the use or development of the lands will not cause unacceptable impacts elsewhere. Tipperary County Council should specify the structural or non-structural measures as prerequisites to development and provide information on the residual risks that would remain and how they might be managed. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should not be passed on to development management.
- An area of land zoned Community Services and Infrastructure which can allow highly vulnerable development, located on the southern side of Dillon Bridge, has not been assessed against the criteria of the Plan Making Justification Test. Highly Vulnerable Development is not appropriate in Flood Zone A or B unless it can be demonstrated that all criteria and sub criteria have been satisfied.

Consideration:

Introduction

Noted.

Mapping Datasets

Noted. The OPW comments notes that the PFRA fluvial, coastal, and groundwater mapping have been “superseded” (as consistent with the SFRA) by updated data sets, while the pluvial data set has not been replaced or updated, but is considered unsuitable for use. Further, the OPW PSFRM Guidelines specifies in Section 2.24 that “flood zones are determined on the basis of the probability of river and coastal flooding only”. Therefore, pluvial mapping should not be encompassed within flood zone definition, which is the case in the SFRA. Table 4.1 and section 4.2.1 of the SFRA will however, be amended to reflect the consideration of PFRA pluvial mapping.

Consideration of Climate Change

Noted.

Policy 8.4 part (d) will be amended to make specific reference to Table 6.4 of the SFRA.

Sections 3.8, 6.6.1 and 7.2 of the SFRA will be updated to remove reference to regional based climate models, and instead refer to the 2019 Flood Risk Management Climate Change Sectoral Adaptation Plan as the prevailing source for climate change information.

Flood Risk Assessments

The matter of Flood Risk Assessments is already covered in the Development Management Standards (Appendix 6) of the Tipperary County Development Plan 2022-2028. In addition, any development proposal must also have regard to the SFRA, which forms part of the LAP.

Sustainable Drainage Systems (SuDS)

The SFRA refers to Drainage and Surface Water Management measures in Section 6.6 including relevant DHLGH and CIRIA SuDS guidance.

The SFRA will be updated to include reference to the Department of Housing, Local Government and Heritage (DHLGH) Rainwater Management Plans – Guidance for Local Authorities (2024), which sets out targets for RMPs across the country which will be referenced as part of the SFRA.

Town Environs

Noted.

Justification Tests

The Justification Tests contained in the SFRA has been updated to take account of the OPW's comments (see Amendment 65 in Part 2 and Appendix 2 to Part 2 of the Chief Executive's Report).

Recommendation:

1. Amend section 4.2.1 of Appendix 10 SFRA to make it clear that PFRA pluvial mapping was considered. (See Amendments 60 in Part 2).
2. Amend Policy 8.4 part (d) to make specific reference to Table 6.4 of the SFRA. (See Amendment 42 in Part 2).

3. Amend Sections 3.8, 6.6.1 and 7.2 of Appendix SFRA to remove reference to regional based climate models, and instead refer to the 2019 Flood Risk Management Climate Change Sectoral Adaptation Plan as the prevailing source for climate change information. (See Amendments 59, 61 and 62 in Part 2).
4. Amend Section 6.7 of Appendix SFRA to include reference to the Department of Housing, Local Government and Heritage (DHLGH) Rainwater Management Plans – Guidance for Local Authorities (2024), which sets out targets for RMPs across the country which will be referenced as part of the SFRA. (See Amendment 63 in Part 2).
5. Amend Appendix F to the Appendix 10 SFRA to update the Justification Tests (see Amendment 65 in Part 2 and Appendix B to Part 2 of the Chief Executive’s Report).

Submission Number: 13	Submission Name: Department of Education (DoE)
<p>Submission Summary:</p> <p>The submission notes the population increase of 1,154 people for Carrick-on-Suir 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 with the 2022 Census results to determine that the potential projected growth figure for Carrick-on-Suir between 2023 and 2031 now stands at 1,173 persons.</p> <p>The Departments current assessment is that any future school place requirement both at primary and post-primary arising from the planned growth in table 3 of the Draft LAP can be catered for at existing school facilities.</p> <p>The Department’s preference would be to expand the current six school facilities in Carrick-on-Suir should there be a requirement for additional places. DoE welcomes Section 5.2.2 of the draft LAP and that the Draft LAP has applied land use zonings to enable expansion where possible.</p> <p>DOE requests that the site of the new school building for Gaelscoil Charraig na Siúire is rezoned to Community Services and Infrastructure in line with the other schools in Carrick-on-Suir.</p>	

DoE welcomes Policy 5.5, Objective 5C and Policy 8.6 of the draft LAP.

The Department notes and welcomes Table 5.1 Sustainable Transport Objectives for Carrick-on-Suir. To improve and enhanced walking and cycling routes. The Department supports the development of sustainable travel links between schools and residential areas.

The DoE anticipates that in the future additional Special Education Needs provision will be required at primary and post-primary level with the possible need for increased accommodation. THE DOE would welcome specific support for the provision of school accommodation for children and young people with special educational needs.

In terms of assessing future capacity, the DoE has to be mindful of unforeseen circumstances such as the Ukrainian crises which could necessitate reassessment of school place provision. The Department will engage with TCC where any assessment requires a review of school provision.

The Department welcomes the continued engagement with TCC.

Consideration:

The growth figure applied by the Department is noted. The point regarding engagement with TCC on potential reviews of school provisions is welcomed.

The request to have the same land use zoning applied to the new school as other schools in the plan area is accepted, and will be updated on the Land Use Zoning Map.

Recommendation:

1. Amend the Land Use Zoning map to change the zoning at the new school building at for Gaelscoil Charraig na Siúire to Community Services and Infrastructure (see Amendment 66 in Part 2)

Submission Number:

14

Submission Name:

Department of Environment, Climate and Communications (DoECC)

Submission Summary

The submission requests that national plans/policy are taken into consideration when drafting of the LAP, including the legally binding Climate Action Plan 2024 (CAP24), the Departments Statement of Strategy 'Le Chéile 2025' and the UN2030 Agenda for Sustainable Development Goals:

- i. Climate Action- requests that the LAP references and is consistent with the CAP24. The submission recommends the inclusion of an objective/policy that supports the implementation of CAP24 (and annual revisions thereof).
- ii. National Adaptation Framework - recommends the inclusion of an objective/policy that supports the implementation of the National Adaptation Framework.
- iii. Local Authority Climate Action Plan - recommends the LAP include objectives/policies to ensure the implementation of the Tipperary LACAP and related actions.
- iv. Renewables- The submission welcomes and supports the transition to renewable energy, in particular Policy 8.1, Objective 2A and Objective 5A. The LAP should have regard to updated to national policy and renewable energy targets under the CAP24.
- v. Electricity Grid - recommends that the LAP references the publications: *Shaping Our Electricity Future 1.1* (EirGrid) and ESB Networks Strategy: Networks for Net Zero.
- vi. 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, 2G and 2H which generally align with higher level policy to promote the electrification of heating, energy conservation and energy efficiency.
- vii. Compact Growth and District Heating- The submission recommends that 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.
- viii. Waste and the Circular Economy - The submission welcomes Objective 8D which supports 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 referenced in the LAP. The Department also requests the author notes the targets set out in the SDGs, noting SDG 12 -Responsible Consumption and Production.
- ix. Telecommunications - The LAP should include reference to and include policy/objectives to support the development of telecommunications infrastructure including the roll out of 5G/.
- x. Air Quality – encourages the authority to have regard to the Clean Air Strategy for Ireland

Consideration

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

- i) Climate Action- The Draft LAP has been prepared in a manner consistent with the Climate Action Plan 2024. Reference to the alignment between the Draft LAP and the

CAP24 is clearly set out under Section 2.2 and 8.1 of the Draft LAP Written Statement and again under section 2.1 of Appendix 2, Sustainable Transport Plan.

Both CAP24 and the National Adaptation Framework are recognised as a key policy documents in the SEA and one of the key national plans that the objectives and policy of the Draft LAP were examined against for relevance and compliance.

As outlined in section 2.7 of the NAF, the delivery of climate adaptation action at local level is primarily through the Local Authority Climate Action Plan. The Tipperary Climate Action Plan is supported throughout the Draft LAP. The importance of Nature-based solutions is affirmed through policy and objectives in the Draft LAP (Policy 8.3 and Objective 8C) in line with Section 2.7.4 of the NAF.

- ii) Local Authority Climate Action Plan – As outlined above the Tipperary Climate Action Plan is a key document considered in the development of the Draft LAP. Indeed, a strategic ambition of the Draft LAP is to enable Carrick-on-Suir to become a climate resilient, sustainable and low-carbon town (Section 2.2). Specific objectives to support the Tipperary County Council Climate Action Plan 2024-2029 are already included in the Draft LAP (objective 2A and 5A). Climate objectives developed in accordance with national policy and the LACAP are indicated by a special symbol throughout the plan.
- iii) Renewables-The points made in the submission regarding renewables is noted, as is the reference to energy targets under the CAP.
- iv) Electricity Grid – Potential impacts on public assets and infrastructure was considered by the SEA prepared in tandem with the draft LAP. The Draft LAP could reiterate the need for protection and future development of the electricity network as a key asset by including additional text in Section 8.1.
- v) Built Environment and Heating- The points made regarding further consideration with regard to the energy efficiency of existing residential buildings and support for Objective 2A, 2G and 2H is noted.
- vi) Compact Growth and District Heating - 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 2024. As noted Objective 2H specifically supports the delivery of District Heating. The Council is committed through the Tipperary County Council Climate Action plan to examine the potential of District Heating commencing with the larger population centres.

- vii) Waste and the Circular Economy- The points made regarding Objective 8D 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 Clonmel 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.
- viii) Telecommunications -Section 5.5 and Objective 5F of the Draft LAP set out the policy context on telecommunications infrastructure. Section 5.5 cross references Policy 6-6 of the TCDP. The content of the Draft LAP regarding Telecommunications is considered adequate.
- ix) Air Quality – air quality is referred to in the Draft LAP in connection with green infrastructure in Section 7.1. The air quality in Carrick-on-Suir is currently not covered under the EPA monitoring scheme. Section 4.8 of the SEA Environmental Report deals extensively with Air quality. Key SEA considerations in developing the Draft Plan included:
- The construction of residential, commercial or transport related development may have a negative impact on local air quality and create noise pollution.
 - Active travel development may promote sustainable transport and support improvements in local air quality in the town.

Recommendation:

1. Amend Section 8.1 to provide further text in relation to the energy transmission network. (See Amendment 36 in Part 2).

Submission Number:

15

Submission Name:

Department of Housing, Local Government & Heritage
(DoHLGH)

Submission Summary

The Department outlines heritage related observations/recommendations on Archaeology co-ordinated by the Development Applications Unit.

Funding

The department draws attention to the Community Monuments Fund available from the DHLGH.

Policy and Objectives

Requests that Policy 2.1 should include ‘archaeological monuments’. Reference to the Department’s ‘Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage’ (2019) and the Department’s ‘Improving Energy Efficiency in Traditional Buildings Guidance for Specifiers and Installers’ (2023) could also be included.

Policy 3.6 – Requests that ‘archaeological heritage’ should be included.

Objective 4F – Advises that the Minister be included as a named project partner for any works to Ormond Castle and that any works to Ormond Castle shall be subject to Ministerial Consent under Section 14 of the National Monuments Act 1930 (and Amendments).

Objective 4I - Advises that the ‘Irish Walled Town Network’ is the correct name.

7.2.3 Archaeology

Recommends that a statement of the nature of archaeology and the archaeological heritage, be included in the section on archaeological heritage. Draft text is provided as follows:

‘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’.

Notes that there are 53 various recorded archaeological monuments in the Sites and Monuments Record (SMR) within and around Carrick-on-Suir. Many of these recorded

monuments are also listed in the Record of Monuments and Places (RMP), the statutory list of recorded monuments established under Section 12 of the National Monuments (Amendment) Act 1994. Ormond Castle and the Town Walls are National Monuments.

The Department notes that there is no specific policy on archaeological monuments or the RMP listed in the Written Statement.

8.5 Flood Risk Management

Recommends the following policy in relation to Flood Risk Management:

To ensure that all aspects of archaeological heritage and underwater cultural heritage, in all environments, are considered in the development process, including impacts on elements of the archaeological and underwater cultural heritage.

Recommended development control objectives and policies:

Proposed developments in areas of the marine environment or inland waterways for which there are no located wrecks may be considered to be areas of high archaeological potential due to the number of historic ship losses recorded for these areas over time or areas that have a record for locations of archaeological objects in the past, such as those from the River Suck. Therefore, developments in riverine, lacustrine, intertidal and sub-tidal environments of archaeological potential should be subject to an underwater archaeological impact assessment, which should in general be carried out before any grant of permission.

Reference to the Department's 'Archaeology and Flood Relief Schemes Guidelines' (2023) may also be included.

Additional Information

A number of further archaeological policies and objectives are outlined in the submission with the aim of adding more detail to the existing policies and objectives.

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

Consideration:

Noted. Archaeological and architectural heritage come under the scope of the SEA, as detailed throughout through the SEA Environmental Report. Archaeological and architectural heritage are also already covered by the existing planning framework, including existing legislation and

the existing County Development Plan. The Draft Local Area Plan and associated Tipperary County Development Plan include various provisions that contribute towards the appropriate protection of the environment, including archaeological and architectural heritage and underwater archaeology. The suggested re-wording of policies 2.1, 3.6 and objectives 4F and 4I is noted and actioned.

Recommendation:

1. Amend Policy 2.1 to include ‘archaeological monuments’. (See Amendment 3 in Part 2).
2. Amend Policy 3.6 to include ‘archaeological heritage’. (See Amendment 8 in Part 2).
3. Amend Objective 4F to include the Minister as a named project partner for any works to Ormond Castle and that any works to Ormond Castle shall be subject to Ministerial Consent under Section 14 of the National Monuments Act 1930 (and Amendments). (See Amendment 16 in Part 2).
4. Amend Objective 4I to correct the reference to the ‘Irish Walled Town Network’ (See Amendment 18 in Part 2).

Submission Number:

18

Submission Name:

National Transport Authority (NTA)

Submission Summary:

General Comments

NTA welcomes the preparation of Appendix 2, Sustainable Transport Plan, as part of the Draft LAP. There are a number of observations/recommendations provided for consideration:

Mode Share Targets

The NTA is supportive of the inclusion of the Mode Share targets and particularly where they are higher than the overall county targets.

Sustainable Travel Actions

The NTA is supportive of the key objectives set out in Table 5.1. The NTA recommends Table 5.1 includes reference to NTA’s Cycle Connects programme under Key Objectives for Cycling.

Sustainable Transport Measures

The NTA is supportive of the suite of measures proposed. However, the following should be considered:

- Reconsider the ‘non-exhaustive’ extent of the suite of proposed measures in Table 5.2 (Table 11 in the LAP) in light of requirements of SEA process.

- Consider the impacts of the one-way traffic system on active travel and examine the potential for contra flow cycling, particularly in the town centre.
- Reconsider the objective to revise the Main Street-Dillon Bridge Junction by the removal of traffic signals, informed by the need to accord with the principles of Universal Design.

Access to Opportunities and Services (ATOS)

The NTA recommends that a Baseline and a Horizon Year ATOS assessment be carried out and the outputs included in the final sustainable Transport Plan.

Roads Strategy

The NTA notes the Draft LAP supports the development of ‘a third river crossing subject to the identification of a need for such transport-related infrastructure’. The NTA emphasises that the need for investment in any additional road capacity needs to be consistent with the Intervention Hierarchy of the National Investment for Transport In Ireland. Recommends that the wording of Policy 6.6 be reviewed such that it would provide for an examination of road space reallocation and the potential conversion of Old Bridge to sustainable transport uses only.

Policy and Objectives

The NTA recommends that specific policies are included in support of Cycle Connects, Connecting Ireland and Local Link. NTA notes that the manner in which the STP proposals are included in the Draft LAP would merit further consideration.

Consideration:

Sustainable Travel Actions

Noted. It is reasonable to include specific reference to Cycle Connects in Table 5.1.

Sustainable Transport Measures

Noted. The Sustainable Transport Plan has been developed at a level relative to the size and role of Carrick-on-Suir designated as a district town within the town hierarchy in County Tipperary. The NTA ‘*ABTA and LTP Supplementary Advice Note 2024*’, does acknowledge the difference in modelling requirement where it states ‘the level of transport modelling required may be quite low for ABTAs in smaller settlements, and in many cases there may be no need for such analysis’. The GIS modelling completed to support the Sustainable Transport Plan is deemed sufficient to inform the development of the active travel measures in the Draft LAP. References to ‘non-exhaustive’ sustainable transport measures will be removed.

With regard to the provision of contra-flow cycling within the town centre, the improvement of the public realm has been through extensive consultation, with approved consents in place with detailed design. These consents have been through extensive consultation and safety audits. Overall, the scheme will provide enhanced cycle facilities throughout, which together with reduced traffic speeds in the urban will have a significant impact on the uptake of sustainable transport modes.

Access to Opportunities and Services (ATOS)

It is noted that the submission recommends that an ATOS analysis is carried out as a basis for assessing the effectiveness of the proposed measures in the Sustainable Transport Plan. The scale of baseline assessment carried out to inform Appendix 2 and the development of objectives and measures is deemed to be appropriate to the size of the settlement and role of the settlement as a District Town. The effectiveness of the proposed measures will be monitored as outlined in Appendix 5, where modal shift and public transport use is monitored as data becomes available. Primarily this will be done using Census data.

6.3 Sustainable Transport Plan

Noted. See point above.

6.4.1 Urban Vehicular Connectivity

Recommendation is noted. Policy 6.1 in the Draft LAP supports improvement to accessibility and movement within Carrick-on-Suir where new developments are proposed. Nevertheless, specific mention of reallocation of road space on Old Bridge could be made under Section 6.4.1.

6.6. Policy and Objectives

Noted.

Recommendation:

1. Amend Table 5.1 of the Sustainable Transport Plan (Appendix 2) to include specific reference to the NTA's Cycle Connects programme under Key Objectives for Cycling (see Amendment 50 in Part 2);
2. Amend Sections 1.0, 5.3 and Table 5.2 of the Sustainable Transport Plan (Appendix 2) to remove references to a 'non-exhaustive' list of measures. (See Amendments 16 , 46 & 51 in Part 2);

- Amend Section 6.4.1 of the Draft LAP to add additional text to provide for an examination of road space allocation and the potential conversion of Old Bridge to sustainable transport uses only. (see Amendment 29 in Part 2);

Submission Number:

22

Submission Name:

Gas Networks Ireland (GNI)

Submission Summary:

The submission identifies the location of a GNI high pressure Gas Transmission pipeline running to the south of Carrick-on-Suir within the LAP area.

A map of the route is included:


Consideration:

The submission and associated safety concerns are noted. It is a key strategic aim of the Draft Plan to protect key material assets and physical strategic infrastructure such as energy networks. In order to safeguard this strategic asset, it is recommended that the quantum of 'New Residential' at Site 14 (see Appendix 1 – SLA) is reduced to ensure development does not encroach on this asset and respects the required buffer zone.

Recommendation:

- Amend the Land Use Zoning Map as it relates to Site 14 (see Appendix 1 – SLA) to ensure development does not encroach on this asset and respects the required buffer zone. (see Amendment 67 in Part 2)

2.2 Local Bodies

Submission Number:	Submission Name:
7	Cllr David Dunne & Cllr Kieran Bourke
<p>Submission Summary:</p> <p>The Submission requests the following changes:</p> <p>Page 27: Should this be renamed to include Dereliction and a separate section included to discuss the approach to dereliction. Strengthen objective at end of Chapter to reflect dereliction.</p> <p>Page 28 first paragraph: Needs to be amended to reflect the fact that a masterplan is being prepared using funding from the EU Just Transition Fund. This masterplan is to be included in the Town Centre First Plan and will establish a framework for the future development of the site.</p> <p>Objective 3E to be amended. Unclear why biodiversity protection requirements are mentioned in this objective. Should be omitted.</p> <p>Appendix 3: Amend to reflect the masterplan currently being prepared. Planning criteria, should include wider possible uses, including tourism, commercial, community and cultural spaces. It should also encourage facilitating adjoining backlands to be redeveloped.</p> <p>Page 36 Section 4.1.3: Name of Stable Lane Digital and Enterprise Hub is now Stable Lane Enterprise Town House</p> <p>Page 36 Section 4.2.1 Mill River Business Park: Given the limited amount of employment land in the centre of the town and the restricted area for the Mill River Business Park to expand, consideration should be given to excluding residential use on this regeneration plot. See also Appendix 3.</p> <p>Section 4.3: We need to expand further on Ormond Castle. There needs to be very specific supports to develop this as a Regional Tourism attraction in IAE.</p> <p>Section 4.3: Need to include more detail on the proposed new greenway, connecting to the Waterford Greenway. Wording needs to present the opportunities to grow tourism in the town, and that Carrick-on-Suir becomes the centre for activity breaks.</p> <p>Section 4.4: We need new policies here to support additional tourism accommodation in the town, in particular a new hotel.</p> <p>Section 4.4: Can we amend Objective 4H to add “To support and facilitate” and at the end “including improved or additional cycle and pedestrian links over the River Suir”. Amend on Page 59 as well.</p> <p>Section 5.1 to be amended: Policy on serviced sites to be included as an additional point. Also include in Section 5.6. Suggested wording would be as follows: “The Council will facilitate the development of serviced sites, low-density housing options and reuse of vacant properties</p>	

and brownfield sites within the town on land zoned for that purpose. In this respect the Tipperary ‘Design and Best Practice Guidelines for Cluster Housing Schemes in Rural Villages’ will apply.”

Page 58. New point for Castle Park: Development of a new amenity park to the rear of Ormond Castle, between it and the River Suir. Include new Objective in Section 6.6.

Page 59. Include a new reference below Stable Lane Car Park: Provision of a new car park for tourism purposes, to the rear of Ormond Castle with access off the N24 at the Primary Care Centre. Include this car park as new Objective in Section 6.6 using similar wording.

Page 74: Section 8.2.1: Include wording around UÉs proposed work to upgrade the water infrastructure within the regeneration area.

Page 76: Section 8.5: Does Objective 8E support strongly enough the delivery of a new 1:100 (or greater) flood relief scheme in Carrick-on-Suir. Amend if not.

Page 78. Policy 8.4: Is there anything in this wording that could limit our ability to redevelop Goldcrop. Amend if there is.

Page 84. Zoning matrix: Include car parking as a category. Leave Open for Consideration under Open Space and Recreation

Page 84. Zoning matrix: Include Graveyards as a category. Leave Open for Consideration under Residential

Consideration:

The points made in the submission are welcomed and noted.

Page 27, (*Section 3.3 Land Activation and Strategy for Vacancy and Regeneration*) points made will be actioned.

Page 28, (*Section 3.3.1. Enabling and Supporting Regeneration*) point with regard to the use of EU funding is noted. It should be noted that the Town Centre First Plan (TCF Plan) does not include a Masterplan but rather includes the parameters for the development of a masterplan for this site. The TCF Plan is included in full as a Proposed Material Alteration to Appendix 7 (See Amendment 58 in Part 2)

Objective 3E. The text in this objective was developed during iterative SEA process undertaken during the development of the Draft LAP. The text is added to provide an additional environmental mitigation.

Appendix 3. Point noted and accepted. Change to text in Appendix 3.

Page 36 Section 4.2.1. Point noted. Change to text in Appendix 3.

Section 4.3 (*Tourism Strategy*)

i) Ormond Castle, point noted and will be actioned.

ii) Blueway connecting to Waterford Greenway, point noted and further detail will be included.

Section 4.4 Point noted. Although supporting new tourism accommodation is included within Objective 4F, this merits a specific objective.

Objective 4H. Point noted and accepted.

Section 5.1 and section 5.6. This is noted. Section 5.1 updated to allow for mixed housing and serviced land type developments, where appropriate.

Page 58. Objective 5H of the Draft Plan includes an objective to:

Seek the development of additional recreational and amenity spaces in Carrickbeg having due regard to environmental constraints and sensitivities in this area. It is considered that this objective could be broadened to include the lands adjacent to the River Suir.

Page 59. Objective 3G of the Draft Plan includes an objective:

“To identify suitable locations for coach parking within the town and examine the possibility of adapting existing car parks to provide for coach parking bays - having due regard to the Sustainable Transport Plan and safety.” It is considered that this Objective should be broadened to allow for car and coach parking for tourism purposes.

Page 74: Section 8.2.1: Agreed.

Page 76: Section 8.5:

Objective 8E provides adequate policy support for the development of the flood relief scheme.

Page 78. Policy 8.4:

This policy does place constraints on the development of lands within flood zone areas. However, the wording of these policies has been tested and agreed through a number of other Local Area Plans, and is a specific requirement of the Office of Public Works and Office of the Planning Regulator. This wording has been reviewed and agreed with the Council flood and environmental consultants to provide maximum flexibility in the development of lands within flood risk areas, whilst cognisant of the constraints.

Page 84. Zoning matrix:

The provision of car parking in lands zoned Open Space and Recreation is appropriate provided the car / coach parking is associated with the use of that space i.e. open space and recreation uses are zoned for the enjoyment of the public for play, relaxation, the enjoyment of civic amenities etc. If parking is proposed facilitating the use of the space for these purposes, this would be appropriate. However, car parking associated with private, commercial or other uses would not be appropriate in these spaces. Including a specific category for car parking and making this ‘open for consideration’ would lead to ambiguity and challenge about the appropriateness of car parking in these spaces. It is not therefore proposed to include this category.

Page 84. Zoning matrix:

Rather than include graveyards as a specific category, it is proposed to amend Section 5.2 of the Written Statement and to make it clear that graveyards are a part of Social Infrastructure and Community Facilities. Section 3.7 of Appendix 4 Social Infrastructure Assessment already makes it clear that cemeteries are social infrastructure facilities.

Recommendation:

1. Amend title of Section 3.3 to include dereliction (see Amendment 5 in Part 2)
2. Add text to paragraph 3.3.1 to note funding under EU Just Transition Fund to develop a masterplan for the Goldcrop site. (see Amendment 6 in Part 2)
3. Add paragraph 3.3.4 with text to elaborate on approach to dereliction (see Amendment 7 in Part 2)
4. Add objective in Section 3.7 to tackle dereliction in the town. (see Amendment 9 in Part 2)
5. Add paragraph to 4.3 Tourism Strategy, on achieving a status of regional tourism attraction for Ormond Castle in Irelands Ancient East. (see Amendment 13 and 15 in Part 2)
6. Add paragraph to 4.3 Tourism Strategy, on tourism potential of developing a link between the Tipperary Blueway and Waterford Greenway. (see Amendment 13 and 17 in Part 2)
7. Add objective in Section 4 to support additional tourism accommodation in the town. (see Amendment 17 in Part 2)
8. Amend text in Section *5.1 Residential Development* to allow for a mix of housing types, including serviced sites where appropriate (see Amendment 20 in Part 2)
9. Amend Objective 5H of the Draft Plan to broaden the scope of this objective to include the lands adjacent to the River Suir. (see Amendment 24 in Part 2)
10. Amend Objective 3G of the Draft Plan to broaden the scope of this objective to include for car and coach parking for tourism purposes. (see Amendment 10 in Part 2)
11. Amend Site 1 in Appendix 3 – Goldcrop, noting that masterplan will be prepared. (see Amendment 52 in Part 2)
12. Amend Site 2 in Appendix 3 – Former Mart Site to ensure this site is used primarily for employment and enterprise uses. (see Amendment 56 in Part 2)
13. Amend Section 8.2.1 of the Draft Plan to include reference to water supply improvement works within the regeneration area. (see Amendment 38 in Part 2)
14. Amend Section 5.2 of the Draft Plan to include reference to burial grounds. (see Amendment 22 in Part 2)
15. Amend Name of Stable Lane Enterprise Town House (see Amendment 11 in Part 2)
16. Amend Table 11 in Section 6.3 to reference pedestrian and cycle links over the River Suir (see Amendment 27 in Part 2).

Submission Number:

10

Submission Name:

	Tony Musiol on behalf of Carrick-on-Suir Tourism & Economic Development Committee (CoSTEDC)
<p>Submission Summary:</p> <p>The submission on behalf of CoSTEDC welcomes the draft LAP and comments on the considerable work being undertaken by the Town Team in producing the Town Centre First plan. The submission notes the following:</p> <ul style="list-style-type: none"> • Considering the low population growth and long term unemployment levels a premium needs to be put on efforts to drive economic growth in the town – in this regard current and planned projects such as the RRDF, Vision 2030 Plan (CoSTEDC), the Ormond Quarter and the Tides of Time at the Heritage Centre are critical. • Supports the goals of repurposing the town centres area for living including above retail premises (in Section 2). Proposes that an objective is included to support a pilot project in Carrick-on-Suir to showcase living over the shop (suggested to amend this to Objective 3C) • Important to include housing suitable for young professional families to the housing mix in Carrick-on-Suir • In Section 3.1, Town Centre First, amend text to change completion date of Town Centre First Plan to February 2025. • Recommends including an objective in Section 3.6 to support building owners to clean and paint their premises in line with the RRDF regeneration works. • Requests including a statement about the preservation of the historic Town Clock and building • In Section 4.3 Tourism Strategy, recommends setting a bolder goal in terms of tourism ambition. • Requests that page 41 (within objective 4I) mentions the new ‘Explore Carrick-on-Suir’ tourism and community initiative and the positioning of Carrick-on-Suir as the hub at the heart of the Linguan Valley and Comeraghs. • Suggests including an objective 4K, supporting The Tides of Time exhibition at the Heritage Centre 	
<p>Consideration: The points made in the submission are noted.</p> <p>Central to the Draft LAP and to the forthcoming Town Centre First Plan for Carrick-on-Suir is tackling long term vacancy and dereliction. As noted, Objective 3C offers support in this regard and is further supported in the Draft LAP by Objective 3D and associated revolving funding from schemes such as the Urban Regeneration and Development Fund - Third Round of Funding Support, Buy and Renew and Croí Cónaithe schemes.</p>	

The proposed land use zoning provides for a broad mix and tenure of housing to meet all market needs.

The point on completion date of TCF Plan is noted.

Securing funding for painting/upkeep of shopfronts and buildings generally falls within the Municipal District.

Section 3.6 and Section 7.2 of the Draft LAP along with the ACA Statement of Character provide full support to the archaeological and architectural heritage of the town.

Significant emphasis has been put on the strong tourism potential of Carrick-on-Suir in the Draft LAP. Section 4.3 lays out the Tourism strategies and projects developed by stakeholders including CosTEDC. The Tides of Times and Heritage centre are mentioned within section 4.3. The point made on 'Explore Carrick-on-Suir' tourism and community initiative and the positioning of Carrick-on-Suir as the hub at the heart of the Linguan Valley and Comeraghs is welcomed.

Recommendation:

1. Amend Section 4.3 of the Draft Plan in relation to the 'Explore Carrick-on-Suir' tourism and community initiative and reference to Linguan Valley and the Comeraghs. (See Amendment 14 in Part 2).
2. Amend Section 3.1 to update progress information of Town Centre First Plan. (See Amendment 4 in Part 2).

Submission Number: 12	Submission Name: Tony Musiol on behalf of Carrick-on-Suir Tourism & Economic Development Committee (COSTEDC)
Submission Summary: This submission was a duplicate of submission no. 10.	
Consideration: See submission no. 10 above.	
Recommendation: See submission no. 10 above.	

Submission Number:	Submission Name: Niall Walsh on behalf of Carrick-on-Suir Development Association (CoSDA)
Submission Summary:	

CoSDA supports the content and aims of the draft Local Area Plan 2025-2031.

Requests more emphasis placed on attracting Foreign Direct Investment to the town given its advantageous location. FDI would bring considerable benefits to the town and is appropriate given the good infrastructure and the towns proximity to Waterford and Kilkenny.

Consideration:

The positive comments made on the content and aims of the Draft LAP are noted and welcomed. The points made with regard to economic development and attracting Foreign Direct Investment to the town are noted. The Draft LAP seeks to leverage the strategic location of the town and good infrastructure provision to optimise opportunities for economic development over the plan period.

Recommendation:

No alterations recommended to the Draft LAP.

2.3 Zoning Related Submissions

Submission Number: 6	Submission Name: Thomas Downey on behalf of land owners of former Mart Site.
Submission Summary: The proposed zoning of the site has been considered by the site owners. It is requested that the zoning for the site is changed from Regeneration to Urban Core.	
Consideration: The site of the former marts is a vacant and underutilised site. The site is not contiguous to the lands zoned Urban Core in the Draft LAP Zoning Map. The land use zoning 'Regeneration Zone' provides for targeted redevelopment, consolidation and regeneration activity on underused sites and is broadly in line with 'Urban Core' in nature.	
Recommendation: No change to the Draft LAP recommended. See recommendations in relation to submissions 7 and 19.	

Submission Number: 23	Submission Name: Conroy Architects on behalf of JSF Construction Limited
Submission Summary: <ul style="list-style-type: none">The submission is made on behalf of JSF Property Holding Ltd., who have completed a number of residential developments in Carrick-on-Suir and Cashel and are constructing other residential developments in Cashel and Clonmel. Further developments have been granted permission in Ballyclerihan and Gleann Na Locha Carrick-on-Suir.The submission is made in respect of lands (0.86ha) at Ballylynch, adjacent to Ormonde Crescent and it is requested that the subject lands are zoned for Residential use.	



- Serviced - The site is serviced (roads, footpaths, water supply, public lighting, foul and surface water infrastructure) and is capable of being connected to the existing cycle network.
- Compact Growth - The development of the lands for residential purposes is logical – completion of adjoining estate and consolidation of residential urban edge where it meets employment zoned land.
- Walking Analysis – Site within 1500m of the town core (within 20-minute walking distance). Established neighbourhood facilities located within 5-minute walk.
- Submission includes a study which concludes that there is no need for additional amenity space, rather existing amenity space needs improvement.
- Residential zoning of the land would deliver a catalyst for wider and sustainable improvements in the neighbourhood.

Consideration:

The submission site is zoned 'Amenity' under the current Carrick-on-Suir Development Plan 2013 (as varied and extended). The Draft LAP proposes to retain this Amenity zoning for the site.

The allocation of residential zoning in the Draft LAP has been informed by an evidenced based Serviced Land Assessment (Appendix 1 of the Draft LAP). The methodology for assessment of lands is set out under Section 2.3 of the SLA. Land zoning is also influenced by the provisions of the 'Development Plans- Guidelines for Planning Authorities' (DHLGH, 2022).

As outlined in the Serviced Land Assessment, a minimum requirement for approximately 28.5ha of residential land is required in Carrick-on-Suir to cater for the population growth targets set out in the Core Strategy of the Tipperary County Development Plan 2022-2028. The Draft LAP provides for 31.29ha of land dedicated for residential use only (not including urban core or mixed-use zoning types and infill sites within existing residential areas). In addition, 10.39ha of land has been identified Strategic Reserve.

While the subject site is serviced by roads, footpaths, water, lighting and foul drainage infrastructure, it is at a peripheral location at the edge of Carrick-on-Suir, outside the 10-15 walk-time band and is not considered to facilitate compact growth, compared to more centrally located sites which have been proposed for Residential zoning. Applying a sequential approach to the zoning of lands, it is considered that there are adequate, more suitably located lands to meet the residential growth requirements of the town of the LAP period.

It is also considered that the proposed Amenity zoning, provides a suitable buffer with the proposed Employment zoning on the directly adjacent land to the east.

Recommendation:

No change to the Draft LAP recommended.

2.4 Individual Submissions

Submission Number: 2	Submission Name: Gemma Denny
Submission Summary: <p>The submission recommends two improvement to community facilities</p> <ul style="list-style-type: none"> the provision of toilet facilities near the Blueway indoor sports facilities near the town centre, perhaps on the Unicast Site (Castle St/ Priests Lane) 	
Consideration: <p>Encouraging and facilitating sustainable transport for all the community includes considerations planning for young and the journeys they take. The provision of toilet facilities is a consideration in facilitating accessibility and the ‘whole journey approach’. This is addressed in the consideration/recommendation of Submission 3 above.</p> <p>The accompanying Social Infrastructure Assessment (Appendix 4) indicates a good provision of sporting and community facilities throughout the LAP area, both outdoor and indoors. Support is provided in the plan to projects which enhance the well-being of residents of the town and to projects which align with the aims of Town Centre First, activating and increasing the vibrancy of the town centre.</p>	
Recommendation: <p>No change to the Draft LAP recommended.</p>	

Submission Number: 16	Submission Name: Cllr David Dunne
Submission Summary: <p>The submission builds on the comments in the previous submission (no. 7) in relation to the development of a new amenity park to the rear of Ormond Castle, and requests that the zoning allows for an access/public road from the N24 to the Goldcrop site, using the lands between Ormond Castle & the River Suir.</p>	
Consideration: The submission is noted. There is an existing walkway/cycleway connecting the N24 to the Goldcrop site and recent upgrades has seen lighting installed and created better access and connection to Castle Park. The Council notes that the lands are subject to a number of environmental sensitivities, extending into the Lower Suir S.A.C and also lying partially within Flood Zone A and B.	
Recommendation: <p>No change to the Draft LAP recommended.</p>	

Submission Number:	Submission Name:
17	Muirenn Duffy, RMLA on behalf of Tesco Ireland Limited
Submission Summary: <ul style="list-style-type: none"> • While Tesco does not currently operate a store in Carrick-on-Suir, Tesco are continuously reviewing opportunities to sustainably grow its business. • Requests that the LAP provides policies and objectives that can spur investment in the convenience retail sector and provide for adequate convenience floorspace within the town. It is important that the Draft LAP accommodates the projected population growth by not only supportive policies and objectives to provide for residential and employment lands, but also the necessary supporting infrastructure and services such as education, commercial, retail, and specifically new convenience retail floorspace within the town to meet future demand. • Requests that the County Council consider the future provision of retail convenience floorspace holistically and ensure that the settlement of Carrick-on-Suir is adequately served by such floorspace. The inclusion of supportive policies and flexible land use zoning objectives would be welcomed by retail operators such as Tesco. • Requests the LAP to acknowledge the requirements of modern retailers including appropriate floorplates, car and bicycle parking and servicing access, where possible. When suitable sites are not available in the town centre, edge-of-town centre sites must be considered with flexible zoning objectives to accommodate a modern convenience retail store with an appropriately sized floorspace. It is considered that there are limited sites that can facilitate a modern convenience retail floorplate within the town centre and it would be beneficial if the Draft LAP could also identify appropriate edge-of-centre locations that can be developed for convenience retail use. 	
Consideration: <p>Supermarkets/Neighbourhood Shops are either ‘permitted in principle’ or ‘open for consideration’ in the Urban Core and the Regeneration zones. A neighbourhood shop is also ‘open for consideration’ in the Employment zone. The LAP has identified 6no. brownfield Regeneration Sites (Appendix 3 of the Draft LAP) suitable for redevelopment - five sites are zoned Urban Core and one site is zoned Regeneration. In addition, Policy 3.3 and 3.4 contained in the Written Statement of the Draft LAP specifically relate to retailing, stating:</p> <p><i>Policy 3.3: Support new development proposals that accord with the county retail hierarchy and policy and to support and underpin the vibrancy and vitality of the town centre area and the PRA, in line with the Retail Planning Guidelines for Planning Authorities (DEHLG, 2012).</i></p>	

Policy 3.4: Encourage and facilitate the consolidation and enhancement of the retail function of the town centre and require new development proposals within the Primary Retail Area to provide active uses on the ground floor and resist the proliferation of takeaways and betting shops within the Primary Retail Area.

On this basis, it is considered that that the Draft LAP includes sufficient supportive policies and flexible land use zoning objectives for convenience retailing in the town.

Recommendation:

No change to the Draft LAP recommended.

Submission Number:

21

Submission Name:

Gerard Butler

Submission Summary:

The submission requests that the draft LAP includes for a drive-through coffee shop at Three Bridges in Carrick-on-Suir. A family member currently owns the drive through which is a positive addition to the local area and gives employment to four full time staff. The submission refers to section 2.4.4 of the Draft Local Area Plan.

Consideration: The submission is noted. The land use zoning objectives and zoning matrix sets out an indication of the acceptability or otherwise of a particular use in particular areas. As noted non-conforming uses are supported under certain circumstances as set out in Section 2.4.4.

Recommendation:

No change to the Draft LAP recommended.