



Comhairle Contae Thiobraid Árann
Tipperary County Council

Chief Executive Report

Part 1

**Proposed Material Alterations to Proposed
Variation No. 1 of the Tipperary County
Development Plan 2022-2028
under Section 58 of the Planning &
Development Act 2024 (as amended)**

August 2026



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PART 1

1. Introduction

1.1 Context

Tipperary County Council published Variation No. 1 to the Tipperary County Development Plan 2022-2028 on 20 March 2026. The Proposed Variation is to align the Tipperary County Development Plan 2022-2028, with the 'NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities' issued under Section 28 of the Planning and Development Act, 2000 (as amended), which were published to give effect to the National Planning Framework First Revision (2025). The proposed Variation No. 1 seeks to ensure that the necessary planning framework is in place, including sufficient residential zoned land, to facilitate the achievement of housing growth requirements over the period of the Tipperary County Development Plan 2022-2028 and beyond.

The Proposed Variation was made available for a period from 20 March 2026 to 20 April 2026 (4 weeks and 3 days) and submissions were invited from prescribed bodies, stakeholders and the public during this time. 114 submissions were received during the public consultation process on the Proposed Variation. On 15 May 2026, in accordance with the requirements of Section 58 of the Planning & Development Act 2024 (as amended), the Chief Executive Report (CE report) for the Proposed Variation No. 1 to the Tipperary County Development Plan 2022-2028 was shared with all the elected members of Tipperary County Council.

On 18 June 2026, the elected members of Tipperary County Council resolved to amend Proposed Variation No. 1 in accordance with the recommendations contained within the Chief Executive Report and other additional amendments.

In accordance with the requirements of the 2024 Act, the Proposed Material Alterations (PMAs) to Proposed Variation No. 1 were published on 1 July 2026, with submissions invited until 4pm on 30 July 2026. 38no. submissions and observations were received during the public consultation period on the Proposed Material Alterations (PMAs) to the Draft Variation. This report lists the names of respondents to the consultation, summarises the submissions, provides a consideration of the responses and recommendations.

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 further changes to the Proposed Variation No. 1 arising from the consideration of submissions received during the consultation on the PMAs.

Submissions are numbered in the order they were received. As a result, and to aid ease of reading of this report, numbered submissions may not be sequential but rather grouped by the Municipal District to which the submission relates.

1.3 Legislative Background and Requirements

Section 58 of The Planning and Development Act 2024 (as amended) ("the Act") sets out the requirement to prepare a Chief Executive's Report ("the CE's Report") on any submissions received during the public consultation on the PMAs to the Proposed Variation, and to share this with the elected members no later than 12 weeks after the publication of the Proposed Material Alterations to the Proposed Variation i.e. no later than 22 September 2026.

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

1.4 Public Consultation

Section 58 of the Act sets out the requirements for local authorities in undertaking public consultation. As outlined above, the PMAs to Proposed Variation No. 1 were available to view and make submissions from 1 - 30 July 2026.

1.5 Environmental Assessment and Strategic Flood Risk Assessment

In accordance with Section 58 of the Planning and Development Act 2024 (as amended), Tipperary County Council screened the PMAs to the Proposed Variation and determined that Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) are required. SEA and AA Screening Determinations have been published as part of the PMAs, together with Addendums to the SEA Environmental Report and AA Natura Impact Report. In addition, an updated Strategic Flood Risk Assessment has been prepared in respect of the PMAs.

1.6 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 to facilitate consideration of this report and recommendations contained therein. The matter will be brought before the Elected Members at the Plenary Meeting on 14 September 2026. At this meeting, Proposed Variation No. 1 to the TCDP will be made with or without further modifications to the PMAs. The Proposed Variation No. 1 shall take effect from the day that the variation is made.

2. Submissions Received

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

No.	Name	Submission Type
TCC-C7-1	Maritime Area Regulatory Authority (MARA)	<u>Statutory Consultees, State Bodies, other Government Departments and Other Bodies (11)</u>
TCC-C7-2	Kilkenny County Council	
TCC-C7-4	Environmental Protection Agency (EPA) – SEA Section	
TCC-C7-6	Department of Education and Youth	
TCC-C7-7	Transport Infrastructure Ireland (TII)	
TCC-C7-11	Uisce Éireann	
TCC-C7-12	Office of Public Works (OPW)	
TCC-C7-13	Electricity Supply Board (ESB)	
TCC-C7-14	Department of Housing, Local Government and Heritage	
TCC-C7-19	National Transport Authority (NTA)	
TCC-C7-38	Office of the Planning Regulator	
Thurles MD		<u>Individual Submissions (27)</u>
TCC-C7-9	Denis Ryan & Mid-West Sand and Gravel Ltd	
TCC-C7-15	Ann Flynn	
Nenagh MD		
TCC-C7-3	“Epicone Limited” T/A “Green Finger Ireland” in conjunction and with the permission of the landowner William Ryan	
TCC-C7-5	McGill Planning on behalf of Christopher Lind	
TCC-C7-16	Triona Campbell	
TCC-C7-17	Patrick and Johanna Coleman	

TCC-C7-18	Steve Coakley	
TCC-C7-20	Michael Healy	
TCC-C7-21	Michael Healy	
TCC-C7-22	Eamonn and Norma Power	
TCC-C7-23	Gerard and Ruth O’Mahony	
TCC-C7-24	Karl Clarke	
TCC-C7-25	Elaine and Paul Hegarty	
TCC-C7-26	Irmgard & Michael Holoubek	
TCC-C7-27	Declan and Delia O’Leary	
TCC-C7-28	Bill Meagher	
TCC-C7-29	Ciara Dee	
TCC-C7-30	Amanda and Richard Stephens	
TCC-C7-31	Marese Coakley	
TCC-C7-32	Liam and Rosaleen Rainford	
TCC-C7-33	Michael and Glennis Quinlivan	
TCC-C7-35	Caroline and Mark Eldridge	
TCC-C7-36	Patrick O'Loughlin & Helena Guerin	
TCC-C7-37	Vincent O’Neill & Brona Ni Mhuiri	
Clonmel MD		
N/A		
Carrick-on-Suir MD		
N/A		
Tipperary / Cahir / Cashel MD		
TCC-C7-8	Patrick Ryan	
TCC-C7-10	Hughes Planning on behalf of Monaghan Mushrooms	

TCC-C7-34	Tom Philips & Associates on behalf of Melclon Unlimited Company	
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The following submissions were received outside of the statutory consultation period, these submissions are summarised, but no consideration or recommendation is required or provided on these submissions within this report.

Late Submissions		
Late Submission 1	Lynda Christian	Ballina
Late Submission 2	Health Service Executive (HSE) – National Environmental Health Service	State Body
Late Submission 3	John Egan on behalf of Denis Ryan & Mid-West Sand and Gravel Ltd	Templemore

2.1 Statutory Consultees, State Bodies and Government Departments and Other Bodies

Submission Number: TCC-C7-38	Submission Name: Office of the Planning Regulator
Submission Summary: The submission outlines the OPRs function in the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. Recommendations therein relate to clear breaches of the relevant legislative provisions and observations relate to where clarification, justification or refinement would strengthen the plan. 1. Response to the OPRs submission the Proposed Variation. The Office welcomes and commends the significant work undertaken by the Planning Authority to date and the material alterations in particular, in addressing the recommendations of the Office as expressed in its submission on the proposed Variation at draft stage. The Office welcomes and commends: • The Rezoning of Site CH_7 in Cahir from New Residential to Town Environs (PMA No. 18) • And balancing this with the rezoning of CH_3 in Cahir from Strategic Reserve to New Residential (PMA No. 17). • The positive approach to Recommendation 2 of the Office’s submission at draft stage in respect of flood risk management, noting all matters have been substantially addressed. • The clear comprehensive review of points set out in Appendix A of the SFRA. • The rezoning of Site TM_1 in Templemore from Town Environs to Amenity (PMA No. 20). • The updates to the SFRA in respect of climate change. • Rezoning of site TT_6 in Tipperary Town from New Residential to Amenity (PMA No. 11), reflecting a precautionary approach to flood risk. • The Planning Authority’s response to managing unmapped watercourses including the rezoning of Site TT_2 in Tipperary Town from Strategic Reserve to Amenity. • The Planning Authority’s commitment to produce Rainwater Management Plans and to incorporate the requirements of nature-based solutions and sustainable urban drainage systems guidelines into the next County Development Plan.	

2. Overview of submission on Proposed Material Alterations.

The Office welcomes the proposed material alterations which positively respond to the recommendations made in its submission on the proposed Variation at draft stage.

Notwithstanding this, the Office has concerns regarding a number of proposed New Residential zonings in Thurles, Tipperary Town and Cashel in respect of compact growth and sequential development and recommends that these be reviewed and rezoned.

The Office also recommends that a potential conflict between a proposed New Residential zoning in Tipperary Town and the N24 Cahir to Limerick Junction Road Scheme be addressed.

In respect of flood risk, the Office advises the review of proposed Strategic Reserve zoning in Thurles affected by high end future scenario mapping; and a proposed Strategic Reserve zoning in Tipperary Town to include a reference for the need to undertake a risk assessment should it be zoned New Residential in the future.

3. Delivering sustainable communities and sequential growth

The Office considers that the majority of lands zoned for residential development at material alterations stage, are generally well located. However, the Office has identified 3 sites which should be considered further:

Site TT_15 in Tipperary Town – The Office notes the proposed New Residential zoning of Site TT_15 (PMA No. 13) located on the northern edge of the town. The Office notes that the accompanying SLA identifies the site as inconsistent with principles of compact growth and sequential development. The site is on the periphery of the settlement and physically separated from existing and planned residential neighbourhoods by lands zoned for employment. Given its location, it is not evident how the proposed residential zoning would support a compact, sequential and connected pattern of development, and there is potential for a more car-dependant form of development to arise.

Site T_6 in Thurles and Site CS_22 in Cashel – the Office has concerns in respect of the proposed rezoning of Site T_6 in Thurles from Strategic Reserve to New Residential and the proposed rezoning of Site CS_22 in Cashel from Strategic Reserve / Employment to New Residential. These rezonings may be premature, as it is not clear how the lands will be comprehensively integrated with the wider settlement structure or supported by the necessary services and infrastructure. Further consideration is required in respect of suitable access, connection to sustainable transport modes, and open space provision. The Office considers that these lands should remain as Strategic Reserve, particularly as sufficient lands have been zoned through the Variation process in Cashel and Thurles.

MA Recommendation No. 1 – Delivering sustainable communities and sequential growth

In order to deliver sequential growth and support the coordinated and sustainable development of communities, and having considered the following:

- NPO 9 of the NPF to ensure compact and sequential patterns of growth within settlements;

- NPO 43 of the NPF to prioritise the provision of homes at locations that can support sustainable development;
- The Climate Action and Low Carbon Development Act 2015, as amended mandatory target to reduce greenhouse gas emissions by 51%, the Climate Action Plan 2025 and associated actions including the national Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021); and
- Development Plan, Guidelines for Planning Authorities (2022) that planning authorities adopt a sequential approach when zoning lands for development,

the Office recommends that the Planning Authority makes the Variation without:

- (i) MA 5, Thurles T_6
- (ii) MA 13, Tipperary Town TT_15
- (iii) MA 15, Cashel CS_22

4. Flood Risk Management

The Office notes the zoning amendment of T_5 in Thurles from Town Environs to New Residential. While the Planning Authority has applied the mid-range future scenario mapping extent to the zoning, the SFRA indicates that high-end future scenario mapping should be applied to highly vulnerable development, including New Residential. This matter should be reviewed.

The Office notes that TT_3 in Tipperary Town proposed to be rezoned from New Residential to Strategic Reserve, has an unmapped watercourse in the vicinity. As set out in Appendix A of the SFRA, a flood risk assessment would be required should these lands be zoned for development in the future. The Office advises that additional text be included in the zoning amendment to highlight this requirement.

MA Observation 1 – Flood Risk Management

Having regard to flood risk management, and having considered:

- NPO 78 of the NPF to take account of the potential impact of climate change on flooding and flood risk;
- RPO 116 of the RSES to consider future appropriate land-use policies in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines

the Planning Authority is advised to:

- (i) review zoning amendment of T_5 in Thurles at MA 6 and apply high end future scenario mapping extents to the zoning as required for proposed New Residential and take the precautionary approach as indicated in Appendix A of the updated SFRA Addendum; and
- (ii) make a minor modification to add text to zoning amendment TT_3 in Tipperary Town at MA 10 to advise that should these lands be rezoned from Strategic Reserve to New Residential, an appropriate Stage 3 flood risk

assessment will be required as indicated in Appendix A of the updated SFRA Addendum to address an unmapped watercourse in the vicinity.

The Planning Authority is advised to liaise with the OPW to address this Observation.

5. National Road Network

The N24 Cahir to Limerick Junction Scheme is included on the list of Major National Roads Projects scheduled to commence construction / procurement by 2030 in the NDP Review 2030. The Office has identified a potential conflict at proposed alterations TT_15 in Tipperary Town to rezone from Employment to New Residential which raises distinct planning considerations to that of the existing employment zones. Engagement with TII is advised.

MA Recommendation 2 – National Road Network

Having regard to the need to maintain the carry capacity and safety of the strategic road network, including improvement, upgrading of the existing network and new routes, and having considered the following:

- section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012);
- RPO 140(b) of the RSES (maintaining the strategic capacity and safety of the national roads);
- RPO 151 of the RSES (protection of the strategic transport function of national roads); and
- RPO 167 of the RSES relating to National Road Projects,

the Office recommends that the Planning Authority reviews MA 13 at zoning TT_15 in Tipperary Town and omit any areas of the proposed zoning objective that potentially conflict with the N24 Cahir to Limerick Junction Scheme proposed to commence construction by 2030.

The Planning Authority is advised to consult with Transport Infrastructure Ireland to address this recommendation.

6. Summary

The Office provides a summary of the statutory requirements in respect of the Variation and the role of the OPR.

Consideration:

The content of the submission is noted, and the Planning Authority acknowledges the detailed evaluation and assessment of the Proposed Material Alterations by the OPR. A response to each Recommendation (2) and Observation (1) is provided below.

MA Recommendation No. 1 – Delivering sustainable communities and sequential growth

With regard to MA 5, Thurles T_6:

Comments are noted. It is considered that a number of factors support the designation of the lands for 'New Residential' uses. The lands are adjacent to other zoned lands for development, and the development of the Thurles link road would also support infrastructure provision in this part of the town. The presence of a locally important heritage building may limit the scale of residential development that can be supported on adjacent Site T_2.

However, it is accepted that the lands are towards the periphery of the settlement, and as a result have a substantial physical separation from the town core. The submission on the site (Submission TCC-C1-VAR1-57 submitted during the Draft Variation phase) indicates that the lands will come forward for development, but limited evidence (e.g. engagement with service providers and infrastructure constraints, development of outline plans and layout for the site) has been provided to demonstrate the likelihood of delivering new homes in the short term.

It is reasonable to consider that the development of the lands are more likely to come forward in the medium to long term. As such, a zoning designation as 'Strategic Reserve' is considered to be appropriate. This would allow for the development of the northern section of the lands (Site T_2) and the subsequent development of Site T_6 at a later stage (subject to a revised zoning).

With regard to MA13, Tipperary Town TT_15:

For the reasons set out below, it is considered that the site would not have adverse impacts on the strategic road network. With regard to compact growth, the site is within the built-up area of the settlement, is within reasonable walking distance of the town centre and has access to a number of infrastructural services.

Nonetheless, the points of the Regulator are noted, in particular with regard to the land use zoning of the adjacent and neighbouring lands. As such, it is considered appropriate that the lands should be zoned for 'Employment' uses.

With regard to MA15, Cashel CS_22:

It is considered that a number of factors support the designation of the lands for 'New Residential', 'Strategic Reserve', 'Amenity' and 'Employment' uses in this area of the settlement. The land owners provided a detailed submission (Submission TCC-C1-VAR1-26 submitted during the Draft Variation stage) on the landholding. This submission included a draft masterplan for the wider landholding as well as evidence of engagement with utility providers like Uisce Eireann for the development of the lands. The submission included a detailed assessment of the serviceability and deliverability of the lands, as well as demonstrating at a strategic level how the site could be successfully integrated and connected into its surrounding environment.

The lands are serviced or serviceable in the short term and are considered the most likely lands to come forward for new housing development in the settlement. Lands to the north and north-east of the settlement have significant constraints for development owing to the topography of the land and the associated issues in

delivering physical infrastructure, as well as the landscape, heritage and archaeological constraints associated with the Rock of Cashel. The Rock of Cashel is one of six sites seeking inscription on the UNESCO World Heritage List as the 'Royal Sites of Ireland'.

In addition to the delivery of new homes, the co-ordinated development of the land could also support the development of social infrastructure in the town, through the expansion of sports and playing fields to the north-east of the lands site.

In determining the appropriate quantum of land to be zoned at this landholding, it is considered appropriate that a portion of the land is zoned 'New Residential' and part of the lands would be zoned 'Strategic Reserve' to allow for the appropriate phasing of new development.

Having regard to the above, and the OPR comment that the "lands would benefit from a more coordinated planning approach" and the scale of the landholding, it is considered appropriate that the lands should be developed with the benefit of a masterplan. The proposed zoning of the lands indicated in the 'Proposed Material Alterations' is considered to be appropriate.

The Planning Authority intend to initiate a subsequent variation of the County Development Plan in the coming months to incorporate the settlements of Cashel, Tipperary Town and Templemore. An objective, requiring the development of a masterplan of the Cooper's Lot lands to support the integrated and co-ordinated development of the lands, would be included with the settlement plan for Cashel.

It should also be noted that after a submission was received from land owner of Site CS_16 and considering the infrastructure issues in this location, MA 16 proposes to amend the zoning of these lands from 'New Residential' to 'Strategic Reserve'.

MA Recommendation 2 – National Road Network

Site TT_15 in Tipperary Town is located a significant distance from the route corridor of the proposed N24 Cahir to Limerick Junction project (see Fig 1 below). Though it is acknowledged that the development of residential uses at TT_15 may have some impacts on new junctions associated with the project, any such impacts would have limited effect in comparison with the 'Employment' zoning designation on the lands. It is considered that zoning of the lands would not conflict with the N24 Cahir to Limerick Junction project.

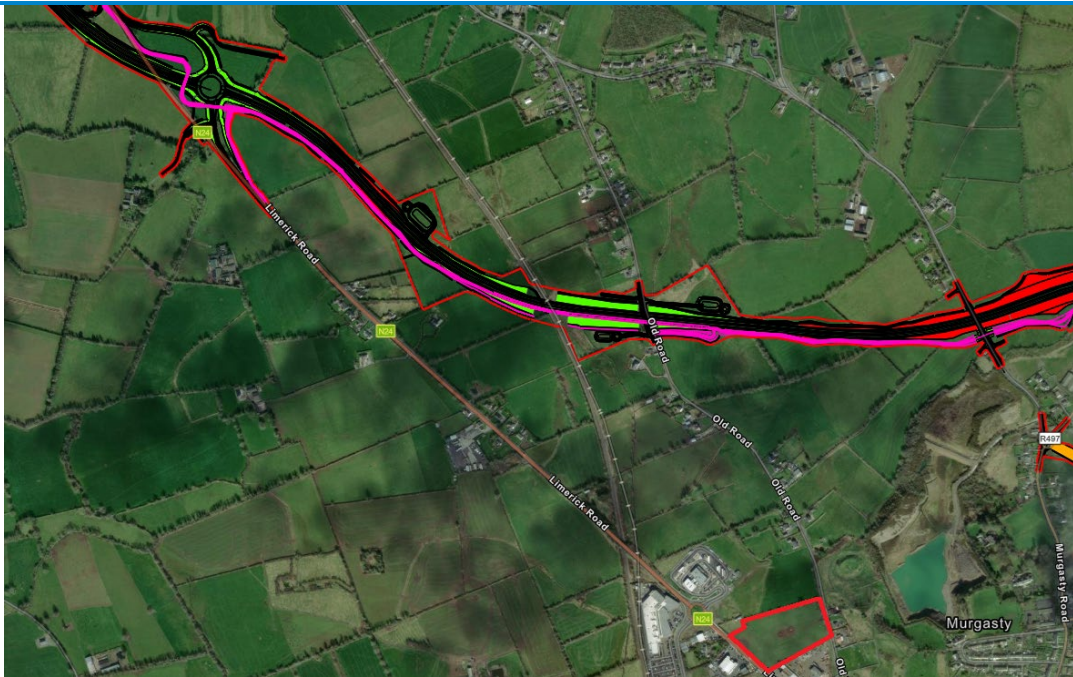


Figure 1: N24 Cahir to Limerick Junction scheme. TT_15 outlined in red

MA Observation 1 – Flood Risk Management

- (i) In respect of T_5 in Thurles, all sites proposed in Proposed Variation No.1 have been reviewed against both the mid-range future scenario (MRFS) and high-end future scenario (HEFS) climate change extents. T_5 was reviewed against both the MRFS and HEFS extents. Given the site lies partially in the MRFS extents, this was stated given it is more conservative to highlight over only considering the greater HEFS extents, and implicitly demonstrates that if the site is impacted by the MRFS it is additionally impacted by the HEFS. The SFRA will be revised to make this explicit, noting the site is impacted by both the MRFS and HEFS extents.
- (ii) In respect of TT_3 in Tipperary Town, any future rezoning of the site would be subject to an appropriate level of flood risk assessment to inform such rezoning proposals, and would be issued to both the OPR and the OPW, as prescribed bodies, for comment. A note on the zoning map is not considered warranted or standard practice in this instance.

Recommendation:

- Omit Site T_6 from the Proposed Variation and revert back to 'Strategic Reserve' zoning (see further amendment no. 2 in Part 2)
- Omit Site TT_15 from the Proposed Variation and revert back to 'Employment' zoning (see further amendment no. 3 in Part 2).
- When developing a subsequent variation to the County Development Plan to incorporate the town of Cashel, an objective should be included with the settlement plan for Cashel, requiring the development of a masterplan for the

Cooper's Lot lands to support the integrated and co-ordinated development of the lands.

- Amend the Strategic Flood Risk Assessment in respect of Site T_5 in Thurles to further explain the MRFS and HEFS extents that apply to the site (see further amendment no. 6 in Part 2).

Submission Number: TCC-C7-1	Submission Name: The Maritime Area Regulatory Authority (MARA)
Submission Summary: MARA acknowledge and welcome the opportunity to make a submission on the Proposed Material Alterations. MARA note that none of the proposed amendments relate to zoned lands located within the Maritime Area, which in the case of Tipperary includes Carrick-on-Suir only. MARA have considered the material alterations proposed and have no additional comments to make subsequent to their earlier submission dated 9th April 2026. The submission includes additional information in respect of MARAs function as a prescribed body for planning applications and the requirement for TCC, as a coastal planning authority, to send a copy of the adopted variation to MARA.	
Consideration: The submission is noted. MARA have no additional comments to make subsequent to their earlier submission on the Proposed Variation.	
Recommendation: No change.	

Submission Number: TCC-C7-2	Submission Name: Kilkenny County Council
Submission Summary: Kilkenny County Council acknowledge receipt of the correspondence in respect of the Proposed Material Alterations to Proposed Variation 1 of the TCDP and have no comments to make on this process.	
Consideration: As an adjoining local authority, Kilkenny County Council were notified of the Proposed Material Alterations to Proposed Variation No. 1. The submission is welcomed and noted.	
Recommendation: No change.	

Submission Number: TCC-C7-4	Submission Name: Environmental Protection Agency (EPA) – SEA Section
Submission Summary: The submission describes the statutory function of the EPA as an SEA environmental authority under the Strategic Environmental Assessment (SEA) Regulations. <u>Proposed SEA Determination</u> The submission notes TCC’s proposed determination regarding the need for SEA of the Alterations. The submission advises that ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’ guidance document should be considered as appropriate. <u>Sustainable Development</u> TCC should ensure that the Variation, as amended, is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Variation. TCC should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans. TCC should also ensure that the Variation is consistent with key relevant higher-level plans and programmes. <u>Future Modifications to the Variation</u> Any future amendments to the Variation should be screened for likely significant effects of the environment in accordance with the SEA Regulations. <u>SEA Statement</u> The submission outlines that a SEA Statement should be prepared once the Variation is adopted and provides information on preparing the SEA statement. <u>Environmental Authorities</u> Environmental authorities who should be consulted are listed.	
Consideration: The points made in the submission are noted. All statutory requirements for SEA will be undertaken. The requirements of legislation, guidance and best practice that governs SEA has been adhered to throughout the	

Variation process to date and will apply to any further stages of the Proposed Variation through to its completion.

The Proposed Material Alterations and the Proposed Variation are consistent with the proper planning and sustainable development of the area, are in line with higher order plans and programmes and align with national commitments on climate change mitigation and adaptation. A serviced land assessment has been prepared as part of the Proposed Variation.

Any alterations to the Proposed Variation will be subject to further SEA and AA Screening. An SEA Statement and an AA Conclusion will be produced over the final stages of the environmental assessments, prior to the adoption of the Proposed Variation, in accordance with the relevant guidance and legislation.

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

Recommendation:

No change.

Submission Number:

TCC-C7-6

Submission Name:

Department of Education and Youth

Submission Summary:

The Department notes the proposed alterations will amend the amount of land zoned for a number of settlements in the Core Strategy Table. However, it is noted that there is no amendment to any of the housing requirement figures as outlined in the proposed Variation 1. Therefore, the Departments April 2026 submission to Proposed Variation 1 remains relevant.

Proposed Material Alteration – PMA No. 29 – The Department notes the proposed alteration to amend the zoning of site KL_9 in Kilsheelan from 'New Residential' to 'Community Services and Infrastructure'.

The Department acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs. The Department thanks TCC for the consideration of its submission to the Proposed Variation and welcome continuing engagement with the Council in relation to school provision in the county.

Consideration:

The submission is noted. The Department are correct in noting the housing requirements for each settlement has not altered as a result of the Proposed Material Alterations. The housing requirements are based on the county housing requirement figure contained in the S. 28 NPF Implementation Guidelines. TCC are committed to working collaboratively with the Department in respect of school provision in the County.

Recommendation:

No change.

Submission Number:

TCC-C7-7

Submission Name:

Transport Infrastructure Ireland (TII)

Submission Summary:

The submission is made in respect of proposed land use zoning objective amendments impacting national road schemes in planning in County Tipperary.

TII welcomes the Proposed Material Alterations arising from the consideration of the Authority's initial submission on the Draft Variation, and, in relation to other Proposed Material Alterations on display, outlines the following observations for the Councils consideration.

a) Proposed Material Alteration no. 13

TII notes Proposed Material Alteration concerning lands at Bohercrow, Tipperary Town (Site TT_15) and the proposal to alter the zoning objective from 'Employment' to 'New Residential'. The TII's submission outlines the various policy documents supporting this national road project and the relevant section of the S. 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and the County Development Plan.

It is not clear from the Proposed Material Alterations to Proposed Variation no. 1 that implications, from the zoning amendment proposal, for the N24 Cahir to Limerick Junction Scheme have been considered and addressed.

TII Recommendation

- TII recommends review of the above identified proposed mapping amendment (Site TT_15) to ensure that NDP Schemes are safeguarded in accordance with Government and Development Plan policy. TII strongly recommends clarification, and potentially amendment, relating to this matter prior to any decision to adopt the proposed Material Alteration to Proposed Variation no. 1. TII advises consultation with the Councils national roads project team (Mid-West National Roads Office) and TII.

b) Other Matters;

TII noted and welcomes the consideration of the Authority's initial submission by the Council in the CE Report. However, it is unclear that the zoning alterations have been reviewed to consider potential cost implications for the Schemes concerned. The submission references and reiterates Section 2.9 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) in respect of zoning proposals and financial viability of road schemes. Therefore, in relation to the following sites:

- Clonmel: 'C_9 Community Services and Infrastructure to Strategic Reserve, and;
- Kilsheelan: KL_1 New Residential to Strategic Reserve; KL_3 Agriculture to Strategic Reserve; and KL_4 New Residential to Strategic Reserve,

TII's position remains as set out in the Authority's initial submission on the Proposed Variation in April 2026.

TII Recommendation

- In view of the importance of these NDP schemes and the requirements of both Section 2.9 of Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and the County Development Plan, TII recommends clarification, and potentially amendment, relating to this matter prior to any decision to adopt Proposed Variation No. 1. TII advises consultation with the Councils national roads project team (Tramore House National Roads Office and Mid-West National Roads Office) and TII to ascertain and address any implications for the proposed N24 Waterford to Cahir Scheme and the N24 Cahir to Limerick Junction Scheme arising from the Proposed Variation.

Consideration:

The submission is noted. The strategic importance of the N24 and the N24 Waterford to Cahir Scheme and the N24 Cahir to Limerick Junction Scheme are acknowledged and supported in the Tipperary County Development Plan (Section 12.5 'Roads Priorities for Tipperary', Planning Policy 12-3 and Planning Objective 12-B). Particularly, Planning Policy 12-3 seeks to *"protect the viability of the 'Strategic Transport Investment' priorities in the road network as set out in Section 12.5.1, by reserving corridors for the proposed routes free from inappropriate development."* Section 12.5.2 of the TCDP confirms that new development proposals will be assessed having regard to Spatial Planning and National Roads: Guidelines for Planning Authorities (DECLG, 2012).

Proposed Material Alteration no. 13 (Site TT 15 in Tipperary Town)

Please refer to the consideration of the 'Office of the Planning Regulator' submission (Submission TCC-C7-38), where it is recommended that Site TT_15 in Tipperary Town is reverted back to its 'Employment' zoning.

Lands zoned Strategic Reserve at Clonmel (C 9) and Kilsheelan, (KL 1, KL 3 and KL 4)

The comments in respect of these sites are noted.

In Clonmel, there is no Proposed Material Alterations for site C_9. In Kilsheelan, there are no Proposed Material Alterations for KL_1 KL_3 and KL_4.

As set out in the Variation (Section 5.3.1.A), the primary purpose of the 'Strategic Reserve' zoning is to safeguard land for housing for future Development Plan periods and it is not the intention that SR land would be available for immediate development under the current Development Plan. In addition, the proposed zoning 'Strategic Reserve' may be considered more restrictive than the existing zoning of these sites, having regard to the zoning objective and associated zoning matrix published as part of the Proposed Variation.

For example, no land use is 'permitted in principle' in the Strategic Reserve zoning and the majority of land uses are 'not permitted' in the Strategic Reserve zone. Residential is 'Permitted in Principle' in the New Residential zone (existing zoning of Sites KL_2 and KL_4), compared to 'Open for Consideration' in the Strategic Reserve zone. And while residential is 'open for consideration' in Strategic Reserve zoning, residential development will only be considered under very limited and specific circumstances (as per proposed policy 5-18 which forms part of the Proposed Variation No. 1).

Recommendation:

No change recommended on foot of this submission, though Site TT_15 (Material Alteration No. 13) is recommended to revert to 'Employment' having regard to the submission made of the OPR, for reasons relating to compact growth rather than impacts on the strategic road network (see Further Amendment No. 3 in Part 2).

Submission Number:

TCC-C7-11

Submission Name:

Uisce Éireann

Submission Summary:

Uisce Éireann welcomes the opportunity to comment on Proposed Material Alterations to Proposed Variation No. 1 to the Tipperary County Development Plan 2022-2028.

Uisce Éireann publishes Water Supply and Wastewater Treatment Capacity Registers annually for each county and they are subject to change throughout the year. The latest capacity registers for the county were published in April 2026.

In all instances if someone is considering progressing a development, they should contact UE's Developer Services team who will provide a greater level of detail in relation to the availability of water services.

Some additional site-specific comments are provided below based on a review of available GIS information:

- Site C_14 would require a long extension of approximately 200m to connect to a sewer.

- Site T_3, T_5 and T_7 would require long extensions of 300m, 300m, and 650m respectively to connect to sewers.
- Site TT_16 would require a long extension of 200m to connect to a sewer.
- Site BC_4 would require a long extension of 360m to connect to a sewer.

The exact requirements to service a site will be determined through our connections process and engagement with the Connection and Developer Services team. Where network reinforcements are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works. New connections to Uisce Éireann networks are subject to our Connections Charging Policy.

Consideration:

The submission is noted. Comments on the UE Capacity Registers are noted, which are taken into consideration by the Planning Authority in its statutory functions, including the preparation of land use plans. In respect of the site-specific comments:

- Site C_14 in Clonmel – This site is part of a larger landholding and it is anticipated that the site would be developed in conjunction with residential lands to the north and east, providing a feasible connection to services.
- T_3 in Thurles – Site T_3 is proposed to be zoned Strategic Reserve. It is not anticipated for development in the short-term and would be dependant on 'New Residential' zoned land to the north being developed for servicing. As set out in the Variation, it is not the intention that Strategic Reserve land would be immediately available for development in this plan period, however residential development proposals on lands zoned Strategic Reserve (SR) can be considered under certain limited circumstances set out in Planning Policy 5-18, proposed as part of this Variation.
- T_5 in Thurles – this site adjoins an ongoing development site 'Riverwood' and would facilitate a Phase 3 of this development, with the existing development providing a feasible connection to services.
- T_7 in Thurles – The proposed rezoning from Strategic Reserve to New Residential will facilitate the completion of an unfinished housing estate. The rezoning and development of these lands would enable the removal and decommissioning of the existing wastewater system; delivery of a permanent pumping station; and connection to the public foul sewer network. The Uisce Éireann pre-connection enquiry associated with the previous planning application (23/60748) for a residential development on the site indicates that a wastewater connection is feasible subject to upgrades.
- Site TT_16 in Tipperary Town – The rezoning of this site (0.52ha) from Town Environs to New Residential reflects the established use of the site for an existing dwelling and provides an opportunity for small-scale infill residential development. Developer-led infrastructure may be appropriate in this instance.
- Site BC_4 in Ballyclerihan – this land is proposed to be zoned Strategic Reserve and is therefore not anticipated for development in the short-term. As set out in the Variation, it is not the intention that Strategic Reserve land would be immediately available for development in this plan period, however residential development proposals on lands zoned Strategic Reserve (SR) can be

considered under certain limited circumstances set out in Planning Policy 5-18, proposed as part of this Variation.

Recommendation:

No change.

Submission Number:

TCC-C7-12

Submission Name:

Office of Public Works (OPW)

Submission Summary:

This submission is made specifically concerning flooding and flood risk management. OPW has carried out a review of the documents and note the continued commitment to adhere to the appropriate application of the Planning System and Flood Risk Management Guidelines (2009) and Circular PL02/2014.

Nature-based Solutions and SuDS

The submission sets out the OPWs previous comments on nature-based solutions and SuDS.

There are a number of large residential sites and adjoining residential zonings proposed where integrated and area based solutions may be appropriate. While this may not be reviewed as part of this variation, the OPW welcomes TCC's commitment to produce Rainwater Management Plans and incorporate the requirements of the Guidelines into the next cycle of the county development plan.

Thurles - Site T_5

Material Alteration PMA No.6 proposes rezoning Site T_5 from 'Town Environs' to 'New Residential'. The SFRA describes that a marginal area is within the mid-range future scenario. However, the section 'Climate Change Adaptation' in the SFRA states that "HEFS is to be considered for 'highly vulnerable' development" and these future extents are larger on these lands than the mid-range future scenario extents.



Material Alteration PMA No.6,
Site T_5



OPW Community-Scale Mid-
Range Future Scenario



OPW Community-Scale High-
End Future Extents

Unmapped Watercourses

The OPW had previously commented regarding two sites in Tipperary Town TT_2 and TT_3. Material alterations PMA No. 10 and 11 proposes that site TT_2 is rezoned as Amenity and site TT_3 revert to its original zoning as Strategic Reserve. Should either site be zoned for development in the future it is important that a flood risk assessment to an appropriate level of detail is carried out.

Consideration:

The submission is noted.

Nature-based Solutions and SuDS – comments on opportunity to provide integrated and area-based solutions are noted, which will be considered in conjunction with the Guidelines as part of the next County Development Plan.

Site T_5 in Thurles – comments noted. See consideration and recommendation contained in response to OPR submission above (Sub. No. TCC-C7-38).

Unmapped Watercourses - Comments on Sites TT_2 and TT_3 in Tipperary Town in respect of unmapped watercourses are noted. Any future rezoning of these sites will be subject to an appropriate level of flood risk assessment to inform such rezoning proposals.

Recommendation:

- See Further Amendment No. 6 in Part 2, arising from OPR submission.

Submission Number: TCC-C7-13	Submission Name: Electricity Supply Board (ESB)
Submission Summary: The submission relates solely to the Proposed Material Alterations and should be considered within the broader context of the ESB's submission to the Proposed Draft Variation. The ESB have reviewed the CE Report and notes that no change to the proposed variation is recommended on foot of the ESB's submission. However, the ESB welcomes recognition by TCC of the importance of upgrading and expanding the electricity network and the commitment to continued collaboration with the ESB in relation to the timely delivery of essential electricity infrastructure. ESB remains committed to working collaboratively with TCC and other stakeholders to support the delivery of sustainable growth in the County and would welcome the opportunity to engage further in relation to infrastructure planning, network capacity and development sequencing as the Variation is implemented.	
Consideration:	

The content of the submission is noted. TCC acknowledges and welcomes the commitment from ESB for continued collaboration and co-operation with TCC on the delivery of essential electricity infrastructure in the county.

Recommendation:

No change.

Submission Number:

TCC-C7-14

Submission Name:

Department of Housing Local Government and Heritage

Submission Summary:

Archaeology

The Department refers to their previous submission on the Proposed Variation and that the Proposed Variation No. 1 included the following recorded monuments (and / or their associated Zones of Notification) which are subject to statutory protection:

SMR/RMP classification	Proposed Variation	Material Alteration	Drawing number
RMP TS075-047---- Castle – unclassified	CH_1 New Residential/Strategic Reserve	-	Cahir-DTSP-001
RMP TS075-046---- Ringfort - rath	CH 2 Strategic Reserve	-	Cahir-DTSP-001
RMP TS081-078---- Ringfort – rath	CH_7 New Residential/Strategic Reserve	Town Environs	Cahir-DTSP-001
RMP TS067-003---- Enclosure	TT_2 Strategic Reserve	Amenity	Tipperary Town-DTSP-001
TN021-042---- Religious house - Fratres Cruciferi (ZoN)	N_4 Strategic Reserve	-	Nenagh-KTSP-001
TN041-043---- Enclosure	T_1 Strategic Reserve	-	Thurles-KTSP-001
TN041-044---- Enclosure	T_3 Strategic Reserve	New Residential	Thurles-KTSP-001

The Department notes the high-level assessment of 'cultural heritage – archaeological and architectural' included in the Draft SEA Environmental Report.

The Department notes that 'cultural heritage – archaeological and architectural' components are not included in the SEA Screening / SEA of the Proposed Material Alterations.

The Department again notes policy 13.9 in the TCDP 2022-2028 in respect of archaeological protection.

The Department recommends an objective be included in Proposed Variation No. 1 in respect of the protection of archaeological heritage.

The Department recommends that the following area be reconsidered so as not to include Recorded Monuments:

- RMP TS075-047---- Castle – unclassified/CH_1 New Residential/Strategic Reserve/Cahir-DTSP-001.
- RMP TS075-046---- Ringfort – rath/CH 2 Strategic Reserve/Cahir-DTSP-001.
- RMP TS081-078---- Ringfort – rath/CH_7 Town Environs/Cahir-DTSP-001.
- RMP TS067-003---- Enclosure/TT_2 Amenity/Tipperary Town-DTSP-001.
- TN021-042---- Religious house - Fratres Cruciferi (ZoN)/N_4 Strategic Reserve/Nenagh-KTSP-001.
- TN041-043---- Enclosure/ T_1 Strategic Reserve/Thurles-KTSP-001.
- TN041-044---- Enclosure/T_3 New Residential/Thurles-KTSP-001.

Consideration:

The submission is noted.

The Department has recommended to reconsider the zoning of the following sites so as not to include recorded monuments; CH_1, CH_2, CH_7, TT_2, N_4, T_1, T_3.

The Proposed Material Alterations does not propose any changes to the following: CH_1, CH_2, N_4, T_1, T_3.

Site CH_7 is being rezoned to Town Environs from its current 'Agricultural' zoning under the Cahir LAP. Site TT_2 is being rezoned to Amenity from its current 'Agriculture' zoning under the Tipperary Town and Environs Development Plan. These zoning objectives, Town Environs and Amenity, are sympathetic to the rural setting and the protection of the rural environment and open spaces.

It is considered that there is an existing framework of robust heritage protection measures defined in the CDP. These measures will guide and govern development occurring in the County, including at Variation lands, ensuring no significant adverse effects on heritage features and compliance with heritage conservation legislation.

Particularly, Chapter 13 of the TCDP (along with Volume 4, which lists the County's heritage assets) in general includes various policies and objectives relevant to ensure the protection of heritage within the County. As referenced in the submission, Policy 13.9 is in place in the TCDP 2022-2028, along with Policy 13-4, 13-5, 13-6 and 13-7 are aimed at safeguarding archaeological heritage assets, including landscapes. Section 13.7 of the TCDP states that any proposed development (due to its location, size or nature) with the potential to affect archaeological heritage assets will similarly be subject to an Archaeological Impact Assessment. This shall include any proposals in proximity to archaeological monuments, proposals extensive in area (half a hectare or more) or length (1 km or more), and development that requires an Environmental Impact Assessment. The aforementioned policy will apply to the lands zoned under this Proposed Variation.

Recommendation:

No change.

Submission Number: TCC-C7-19	Submission Name: National Transport Authority (NTA)
The NTA has the following observations and recommendations in respect of the Proposed Material Alterations: 1. NTA Observations on the Serviced Land Assessment in the Proposed Variation. The NTA outlines their comments on the Proposed Draft Variation and response and recommendation contained in the CE Report. The NTA note that the SLA has not been amended to include an assessment of current of future public transport availability and capacity in relation to the proposed zoning amendments. While many of the proposed zoning amendments are within the settlement boundaries of the various towns and within the 15-minute walk of the town centre, the availability of public transport would be a critical factor in determining the suitability of other zoning amendments where these are more remote from the town centre and are not well served by active travel infrastructure. The NTA recommends that the assessment of such peripheral sites should be reviewed with reference to public transport availability, in order to determine the suitability of the proposed zoning amendments and to minimise the use of the private car at local level. <u>Recommendation:</u> The NTA recommends that the SLAs are strengthened with a more robust analysis carried out of the existing and planned provision of public transport services, with the benefit of the analysis undertaken and the measures identified in the local transport plans and sustainable transport plans. 2. Settlement Specific Observations (Zoning Maps). PMA No. 15 proposes to amend the zoning of CS_21, CS_22 and CS_23 in Cashel from 'Strategic Reserve' and 'Employment' to 'Amenity', 'New Residential' and 'Strategic Reserve.' While not opposed to the proposals set out in PMA 15, the NTA submits that the development of sites CS_22 and CS_23, along with the development of sites CS_9 and CS_19 would benefit from a co-ordinated approach by means of a masterplan or framework plan for the area to consider access to services, connectivity and access/egress points to the existing road network. <u>Recommendation:</u> The NTA recommends that the development of sites CS_22, CS_23, CS_9 and CS_19 would benefit from a coordinated approach that would consider access to local services, connectivity between adjacent estates and appropriate access/egress points.	

Consideration:

Serviced Land Assessments

The submission is noted. While the SLA demonstrates the headline infrastructural and sustainable planning criteria associated with each individual site, detailed background assessments were carried out assessing other considerations including access to public transport, proximity to schools and employment, and with close reference to the completed LTPs and STPs.

The proposed zoning amendments have been based on the principles of compact growth and as acknowledged by the NTA, many of the proposed zoning amendments are within the 15-minute walk of the town centre, facilitating walking / cycling to the town centre to connect with regional and local public transport links e.g. Local Link, regional bus services, train stations.

The peripheral sites referred to by the NTA may apply to Clonmel, which is the largest town in County Tipperary. Particular emphasis was made to ensure that sites in Clonmel are proximate to the Clonmel town bus service:

- The Marlfield Road (Site C_1 and C_14) is served by Local Link Route 356.
- The Ard Gaoithe and Heywood Road area (C_7, C_8, C_9 and C_11) are served by Route CL2 and CL9, noting that sites C_7, C_8 and C_9 are proposed as 'Strategic Reserve' and it is not the intention that Strategic Reserve land would be immediately available for development in this plan period.
- The Fethard Road (C_3, C_4 and C_5) is served by Route, CL1, CL2 and CL9.
- The Clonmel LTP notes that the largest bank of zoned new residential lands is along the Glenconnor Road and north of the N24 along the Cashel and Fethard Roads. The Clonmel LTP has proposed segregated cycle facilities serving each of these areas providing a connection to the wider active travel network and key destinations including the town centre, schools, hospital and large employment and retail centres. These lands will also be closely served by the town bus service providing additional sustainable travel choices for residents.
- The Clonmel LTP proposes segregated cycle facilities from Moangarrif Roundabout into the town centre (Site C_2).

Sites CS 21, CS 22, CS 23, CS 9 and CS 19 (Cooper's Lot Lands) in Cashel

A detailed response is provided in response to the OPR submission above (Sub. No. TCC-C7-38). In summary, a draft Masterplan has been prepared for the wider landholding by the landowner and included in their submission to the Draft Proposed Variation. The submission included a detailed assessment of the serviceability and deliverability of the lands, as well demonstrating at a strategic level how the site could be successfully integrated and connected into its surrounding environment. Early engagement with TCC engineers has already been carried out in the preparation of the developer's preliminary masterplan. The Planning Authority intend to initiate a subsequent variation of the County Development Plan in the coming months to incorporate the settlements of Cashel, Tipperary Town and Templemore. An objective, requiring the development of a masterplan of the Cooper's Lot lands to support the

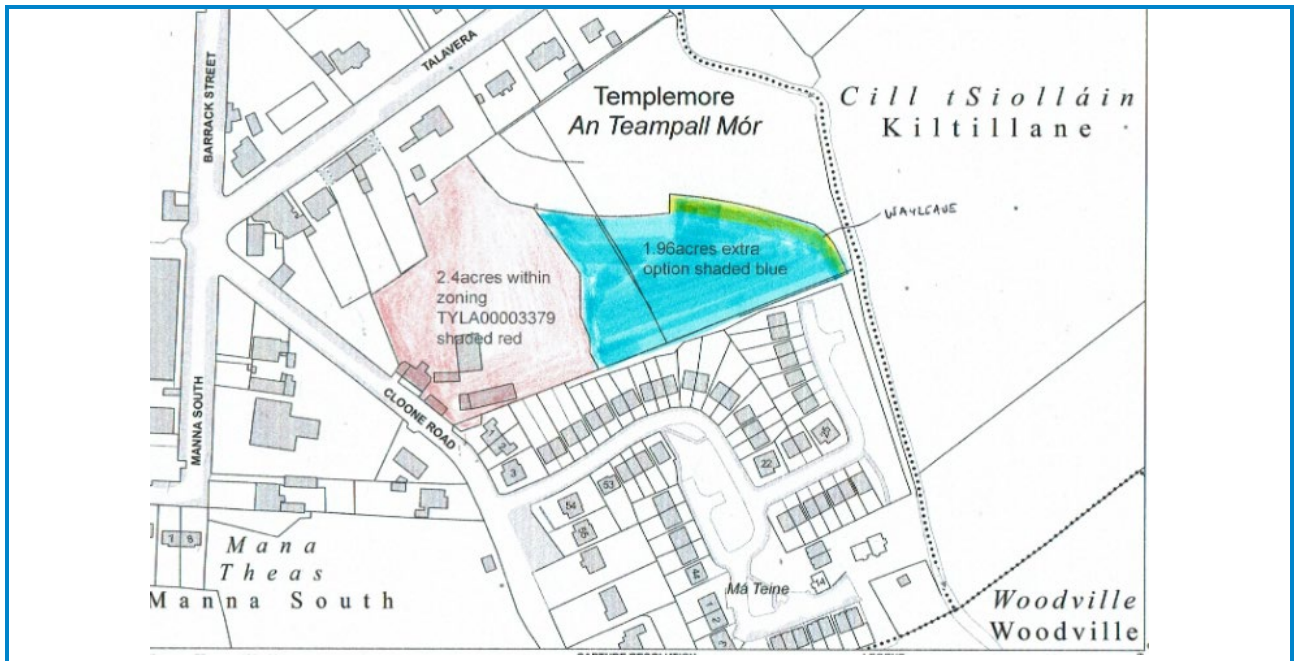
integrated and co-ordinated development of the lands, would be included with the settlement plan for Cashel.

Recommendation:

- As per the recommendation arising from the OPR submission (Sub. No. TCC-C7-38), when developing a subsequent variation to the County Development Plan to incorporate the town of Cashel, an objective should be included with the settlement plan for Cashel, requiring the development of a masterplan for the Cooper's Lot lands to support the integrated and co-ordinated development of the lands.

2.2 Individual Submissions – Thurles MD

Submission Number:	Submission Name:	Settlement:
TCC-C7-9	Denis Ryan & Mid West Sand and Gravel Ltd	Templemore
Submission Summary: This submission requests a zoning amendment for the subject lands from 'Amenity' to 'Residential'. The subject lands (approx.1.96 acres) are shown shaded blue on the map below. The subject lands which are currently zoned as amenity space under the old development plan, lie just to the east of lands zoned residential (ref: TYLA00003379) and on the south bank of the new flood relief river channel. The subject lands are underutilized and have restricted access if not considered as part of a residential development in conjunction with adjacent land parcel - TYLA00003379. The subject lands could accommodate housing along with associated private and open green spaces and as such could have some active recreational use. As a closed off block of land, its recreational value is zero. Templemore is already very well serviced by recreational and amenity spaces. The subject lands are located within the town of Templemore, a well serviced and busy market town making it ideal for higher density sequential urban growth. The subject lands benefit from access to existing services and public transport when taken in conjunction with zoned lands TYLA00003379, ensuring the potential of a highly sustainable development and alignment with National and local development plan objectives, including the NPF and 'Delivering Homes, Building Communities 2025-2030' the Governments Action Plan on Housing Supply and Targeting Homelessness. Financial viability for developers is a key consideration. The proposed re-zoning will increase the size of the residentially zoned land block to 4.36acres, creating an economically viable development proposition. New housing is of critical importance for Templemore and indeed the whole country. This proposal will create a viable development site, thereby attracting developers and realizing the housing delivery targets set out by Government and the Local Authority. Previous zoning decisions regarding the subject lands may have contended with the fact that the lands were subject to a flood risk. The new OPW flood relief channel in Templemore runs through the landowners lands and adjacent to the subject lands. The flood relief works have been successful and as such have negated the flood risk to the subject lands. The subject lands while zoned amenity use are currently of no recreational or biodiversity value. The new flood relief river channel, which divides the landowners landholding, has created a biodiversity corridor and the re-zoning of the land for residential use would potentially enhance the biodiversity corridor.		



Consideration:

This submission does not relate to the Proposed Material Alterations to Proposed Variation No. 1. Only submissions made in respect of the Proposed Material Alterations can be taken into consideration at this stage of the Variation process. Submissions in relation to any other aspects of Proposed Variation No. 1 cannot be considered at this stage in the process.

Notwithstanding this, it should be noted that the land is located within Flood Zone A and not suitable for residential zoning based on existing flood mapping. Updated flood mapping for Templemore has not yet been produced by the OPW to take account of the flood relief scheme in the town.

Recommendation:

No change.

Submission Number: TCC-C7-15	Submission Name: Ann Flynn	Settlement: Holycross
Submission Summary: The submission requests the re-zoning of land opposite the nursing home in Holycross for housing as there is a shortage of houses. The site has a public water supply and a footpath could be constructed, linking to the village. 		
Consideration: This submission does not relate to the Proposed Material Alterations to Proposed Variation No. 1. Only submissions made in respect of the Proposed Material Alterations can be taken into consideration at this stage of the Variation process. Submissions in relation to any other aspects of Proposed Variation No. 1 cannot be considered at this stage in the process. It is also noted the part of the site is outside the settlement boundary of Holycross.		
Recommendation: No change.		

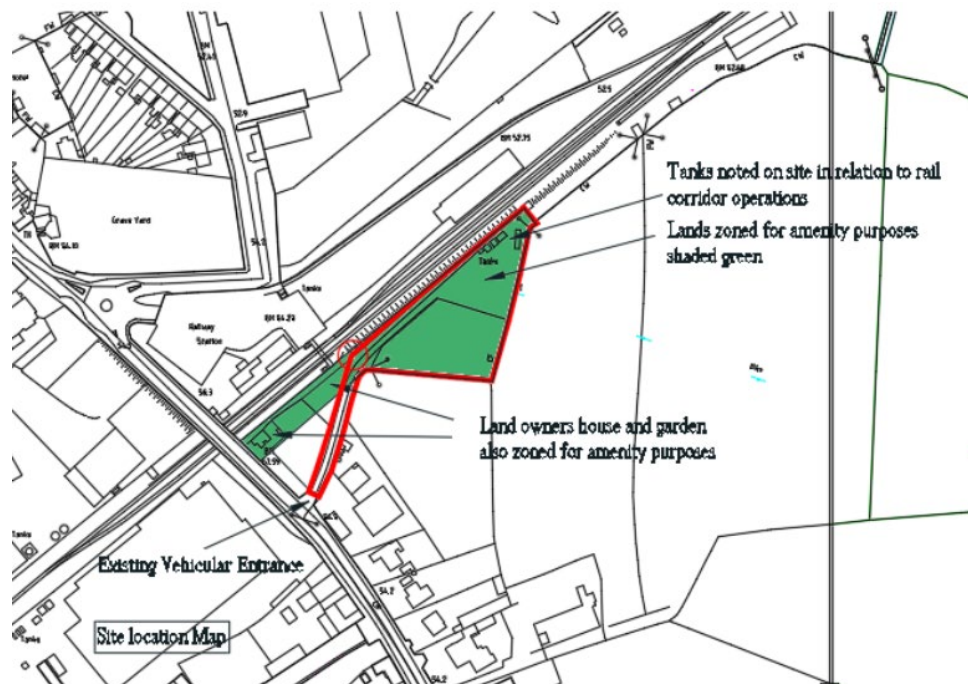
2.3 Individual Submissions – Nenagh MD

Submission Number: TCC-C7-3	Submission Name: "Epicone Limited" T/A "Green Finger Ireland" in conjunction and with the permission of the landowner William Ryan	Settlement: Nenagh
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Submission Summary:

The submission is seeking the rezoning of land (0.4ha) at the Old Tar Yard, Tyone, Nenagh adjacent to the train station from 'Amenity' to facilitate an appropriate employment-generating use compatible with the site's established operational character. The subject lands also form part of a larger private landholding that includes the landowner's existing dwelling and domestic curtilage. The landowner also requests that the incorrect amenity zoning applied to his residence also be amended to reflect the long-established residential use.

Alternatively, should the Council consider that a zoning amendment is more appropriately addressed as part of the proposed review of commercially zoned lands, it is requested that the site be identified for priority consideration during that process.



The site benefits from existing public infrastructure and occupies a sustainable location within walking distance of Nenagh town centre and surrounded by a diverse mix of uses.

The site has a long-established history of engineering, storage and infrastructure-related uses and has never functioned as public amenity or recreational open space. The lands originally served railway engineering operations before being occupied by

the local authority as a depot for road maintenance activities. The existing physical form and established character of the site is therefore fundamentally operational rather than recreational.

The current Amenity zoning appears to have been applied to support the potential future development of adjoining residentially zoned lands. While this is recognised as a legitimate long-term planning objective, there are currently no approved development proposals or implementation programme for those lands. By contrast, there is an immediate opportunity to accommodate the relocation of Green Finger Ireland, an established Nenagh business that has outgrown its existing premises and has received formal notice requiring it to vacate its current location. The business employs local people, operates primarily through online sales and distribution, and requires a larger operational site in a settlement rather than a roadside site in a rural setting.

The site benefits from existing access. While the site is in an area of archaeological interest, any future planning application would be accompanied by an archaeological assessment.

Although a portion of the lands is identified within the Strategic Flood Risk Assessment mapping, the principal development platform is located on significantly elevated ground above the railway corridor which is identified as the flood risk. The extent of a flood risk, if any, can be assessed in detail as part of a future planning application.

It is submitted that the proposal is consistent with the objectives of the National Planning Framework (First Revision 2025), the Southern Regional Spatial and Economic Strategy, the Tipperary County Development Plan 2022–2028 and the Nenagh Local Area Plan 2024–2030. It supports the principles of compact growth, urban regeneration, the productive reuse of serviced urban land and the retention and expansion of indigenous employment.

It is submitted that facilitating an appropriate employment-generating use on the subject lands would represent a more effective use of serviced urban land while remaining consistent with the principles of proper planning and sustainable development.

Public interest and planning gain - The proposal offers a number of wider planning benefits beyond the interests of the landowner which are consistent with national, regional and local planning policy.

It is considered that an appropriate employment-generating use would be compatible with the historical character of the lands, the surrounding urban environment and the strategic planning objectives for Nenagh.

Consideration:

This submission does not relate to the Proposed Material Alterations to Proposed Variation No. 1. Only submissions made in respect of the Proposed Material Alterations can be taken into consideration at this stage of the Variation process. Submissions in

relation to any other aspects of Proposed Variation No. 1 cannot be considered at this stage in the process.

The respondent will have an opportunity to request this zoning change as part of the review of the Tipperary County Development Plan.

Recommendation:

No change.

Submission Number:	Submission Name:	Settlement:
TCC-C7-5	McGill Planning on behalf of Christopher Lind	Nenagh
Submission Summary: The submission welcomes the amendment to the zoning of the lands at Nenagh North to New Residential. As set out in the Chief Executives report, the site is considered to be serviceable and is located proximate to neighbourhood amenities such as existing employment, retail facilities, communities' facilities and existing residential developments. This proposed rezoning is fully in line with the Compact Settlement Guidelines and the Tipperary Development Plan, which align with the principles of sustainable development, compact growth and will enable the sequential delivery of land in Nenagh. As set out in their original submission, the rezoning of this site makes it available for development and will deliver c.193 residential units contributing to meeting the housing targets for Tipperary.		
Consideration: This submission is noted. The submission welcomes and supports Proposed Material Alteration - PMA No. 4 which amends the zoning of land on the Borrisokane Road, Nenagh (Site Ref: N_8) to 'New Residential'.		
Recommendation: No change.		

Submission Numbers:	Submission Name:	Settlement:
TCC-C7-16	Triona Campbell	Ballina (PMA No. 22 - Objective SO9 associated with Site B_4 and B_5)
TCC-C7-17	Patrick and Johanna Coleman	
TCC-C7-18	Steve Coakley	
TCC-C7-20	Michael Healy	
TCC-C7-21	Michael Healy	
TCC-C7-22	Eamonn and Norma Power	
TCC-C7-23	Gerard and Ruth O'Mahony	
TCC-C7-24	Karl Clarke	
TCC-C7-25	Elaine and Paul Hegarty	
TCC-C7-26	Irmgard & Michael Holoubek	
TCC-C7-27	Declan and Delia O'Leary	
TCC-C7-28	Bill Meagher	
TCC-C7-29	Ciara Dee	
TCC-C7-30	Amanda & Richard Stephens	
TCC-C7-31	Marese Coakley	
TCC-C7-32	Liam and Rosaleen Rainford	
TCC-C7-33	Michael and Glennis Quinlivan	
TCC-C7-35	Caroline and Mark Eldridge	
TCC-C7-36	Patrick O'Loughlin & Helena Guerin	

TCC-C7-37	Vincent O'Neill & Brona Ni Mhuiri	
Submission Summary: The above submissions generally relate to the same issue – PMA No. 22 which proposes a new Objective SO9 for Site B_4, adjacent to the Beeches in Ballina. Local residents do not object to new housing on Site B_5 in principle, but object to Material Alteration No. 22 (Objective SO9), which proposes to route vehicular access into B_5 across the established B_4 amenity strip. The submissions request: • Delete Material Alteration No. 22 (Objective SO9), so as to remove the vehicular access objective across the B_4 amenity strip. • If deletion is not accepted, amend SO9 so that access to Site B_5 is provided via a route that does not pass through existing residential estates. This request is directly supported by procedural precedent established by the removal of Site B_3 from the Variation, confirming that the Planning Authority can lawfully drop or materially amend site-specific proposals at this stage of the process. Issues Raised in the submissions can be summarised as follows: • The parent planning permission (Ref: PLC/19657) designates B_4 as a "Nature Trail and Riverside Amenity Area". The parent permission (Ref: PLC/19657) requires the permanent retention and planting-up of the existing mature ditch running along the B_4 boundary. Proposed Objective SO9 directly conflicts with planning permission PLC/19657. • A planning application was made in 2007 for 3no. detached houses at The Beeches, Shannonview (Ref. 06511570). These 3no. houses were on the sites which the parent planning permission (PLC/19657) had omitted. The planning assessment establishes that the wider B_4 amenity strip was the open space provision for the scheme and was relied upon to satisfy Condition 2 of PLC/19657 and to justify releasing sites 1–3 for housing. • Extracts from the plans associated with this parent planning permission (PLC/19657) and the subsequent planning permission (06511570 / PLC 19657) is provided as part of the submission detailing the nature trail and riverside amenity area. Building a road through B_4 would contravene both planning permissions. • As confirmed in the CE Report for Proposed Variation No. 1, the area has been taken in charge which supports its status as public open space for the estate. • An alternative access route into Site B_5 exists to the north of Shannonview via Folios TY58112F and Folio TY40067F, one of which remains in the ownership of the original estate developer, making access feasible. This alternative access has not been considered as part of Proposed Variation No. 1. • There is no published traffic assessment to support access to B_5 via B_4. • Road safety and child safety issues – Site B_4 green strip is the estates primary recreational space. Impact of construction traffic and increased residential traffic. • Unsuitable access from emergency vehicles and non-compliance with DMURS.		

- The proposed removal of green infrastructure along B_4 conflicts directly with natural heritage objectives in the Tipperary County Development Plan 2022–2028, including policies to protect local biodiversity corridors.
- B_4 is an ecological corridor with mature oak trees and hedgerows, used by bats (a protected species) and other wildlife.
- The CE Report does not specifically address the potential environmental and ecological loss associated with a proposed route through B_4.
- The Draft Natura Impact Report specifically refers to Site B_4 and refers to habitat loss and potential impacts. The submission requests confirmation of what mitigation has been applied to B_4 and whether the proposed mitigation is compatible with proposed Objective SO9 which proposes to route traffic through the hedgerow corridor.
- The B_4 strip incorporates a mature drainage ditch and water soakaway for the estate. Excavating this ditch and clearing the native hedgerow network to install a road would create SuDs non-compliance issues and surface water flooding issues in the area.
- The Strategic Flood Risk Assessment (SFRA, June 2026) assesses B_4/B_5 as Flood Zone C for river and lake flood risk only; it does not address the risks of separate pluvial/surface-water drainage at elevated sites such as B_4.
- Requests that the Council disclose the GIS mapping and methodology underlying the Compact Growth and Tier determinations for Sites B_1, B_2, B_4, B_5 and B_6.

Consideration:

The submissions and their contents are noted. The acknowledgement within the submissions of the need to support the development of new housing in Ballina and the fact that there is no specific objection raised to the principle of development of Site B5 is welcome. As outlined in the publication of Proposed Variation No.1 to the Tipperary County Development Plan 2022-2028, the purpose of this Variation is to give effect to the Ministerial guidelines published in July 2025. These guidelines make it clear that additional lands are required to be zoned to support new housing development, and appropriate lands where infrastructure is available should be zoned without delay. Given the existing infrastructure network in place, the evident need for new housing in Ballina, and the recent upgrades to the wastewater system in Ballina, site B5 is well located to deliver new homes to the local community.

Each of the points of the submission are addressed below:

Deletion of Material Alteration No. 22 (Objective SO9) or if not deleted, an alternative route to B_5 to be identified

It should be noted that the effect of the deletion of Material Alteration No. 22 (Objective SO9) would be to remove a specific safeguard for B_4. Removal of this objective would be to accept the principle of development **of all** of B_4 for residential use, rather than a very limited section of this strip of land, which would provide for access. From the remainder of the submission, it is evident that this is not the purpose

of the submission. The alternative, to provide a route that does not go through residential estates is considered further below.

Previous planning permissions

The references and content of these planning applications are noted. However, it is an established principle of planning law that planning applications must be assessed on their respective merits, and the conditions, circumstances and policies in place at the time of any such planning application.

It should also be noted that the process currently being undertaken, of proposed changes to the land use zoning is strategic in nature and does not provide planning consent for development. The planning consent process is undertaken through the submission and consideration of a planning application. The presence, or absence of, specific conditions of a previous planning application cannot obviate the need to have regard to the prevailing conditions, circumstances and policies in place at the time of any future planning application.

It is also noted that Condition 6 of permission PLC/19657 states that:

*All trees and hedgerows on the entire site and as outlined in red on the Location Map and include site boundary shall be retained **unless their removal is necessary to provide road access**. (emphasis added). The boundary with the existing house to the south and south-west of the entire site shall be maintained and strengthened so as to provide for visual screening and for security.*

This condition provides an explicit acknowledgement that future development of adjoining lands may require the removal of trees or hedgerows to provide for road access.

Alternative Access Routes to Site B5

The only alternative access to Site B5 is to the north. Providing access from the north onto the R494 would require the development of a significant roadway at least 50m in length and the development of all associated underground services and infrastructure to go with this accessway. Accessing the lands from the existing estate, in contrast would require minimal intervention (approx. 10m in length) and would utilise existing infrastructure and services much more effectively.

The provision of an accessway to the north would require the removal of a significant scale of hedgerows and trees, at least 50m in length, significantly greater than the alternative proposal to access to the site through B4. Consideration has also been given to ensuring the efficient use of existing public infrastructure servicing in proximity to the site.

The creation of an access way to the north of the site would require a new access onto the R494 outside of the village speed limit restriction. At the junction point then, a speed limit of 80kph would apply. The creation of additional junctions onto a strategic regional road should be avoided where alternative options are available, as in this instance. The creation of additional junction outside of the 50kph onto the strategic regional road would create a significant road traffic hazard and would be contrary to best practice.

For these reasons, alternative access points have been discounted.

Traffic Assessment, Road Safety, DMURS, Construction Traffic, Emergency Access

Each of these issues would be required to be properly addressed through the planning application consent process, rather than the strategic land use zoning phase. There are no evident issues which could not be overcome with the submission of appropriate details to address these issues. In contrast, the provision of alternative access and addition of another junction to the R494 would create significant issues with regard to road safety and construction traffic.

Natural Heritage and Ecological Issues

The Draft Natura Impact Assessment (NIR) recognises that the development of Site B4 & B_5 may, if unmitigated, have adverse impacts on the environment. The purpose of the NIR is to identify the mitigation measures to offset any potential adverse impacts. The NIR sets out the required mitigation measures, including mitigation measures already in place through the policies of the existing County Development Plan and Tipperary Biodiversity Action Plan 2025-2030, and the addition of policy 11-20 which further enhances environmental protection policies. The Draft NIR concludes that the application of the mitigation measures would satisfactorily address environmental issues.

It is noted that the Draft NIR identifies that almost all sites within the Draft Proposed Variation, not just Sites B4 & B5, may require mitigation to offset environmental impacts. This 'bar' for development proceeding on-site is well defined and established under the land use planning framework. Overall, environmental and ecological considerations have been assessed and clearly integrated into the Development Management process at Plan-level, guiding and shaping development, as appropriate. The SEA process for the Variation to date has concluded that this land use zoning proposal will not result in likely significant effects on the environment considering this Plan-level mitigation in place, which, in real terms, would ensure development planning for these lands would support Strategic Environmental Objectives under the CDP and not lead to likely, significant effects on the environment.

Drainage, Surface Water and pluvial flood risk

The purpose of the SFRA is to address strategic flood risk, and the application sites are identified within the lowest flood risk areas. Other flood risk issues would be required to be properly addressed through the planning application consent process, rather than the strategic land use zoning phase. There are no evident issues which could not be overcome at planning application stage, with the submission of appropriate drainage proposals including SuDS.

Development of the site would require the proposal to ensure no impact to flood risk elsewhere, including impact to pluvial and surface-water drainage in the area. Zoning the site does not implicitly mean the drainage capacity would be reduced, where a proposal could increase surface water storage and infiltration through appropriate adoption of SuDS.

GIS Mapping and Methodology

The methodology for assessment of sites is out within the 'Serviced Land Assessment' document (SLA), published as part of the Draft Proposed Variation No.1 to the Tipperary County Development Plan 2022-2028, available [here](#). The GIS data used to inform the SLA is available on the Council's website [here](#). Some of the GIS data layers used to inform the SLA are provided from Uisce Eireann on licence to Tipperary County Council as a public service body.

Conclusion

Given: (i) the evident need for new homes in Ballina; (ii) the availability of infrastructure at the site to delivery new homes; (iii) the absence of suitable alternative access points; it is considered appropriate that a very limited section of Site B4 is available for access to develop Site B5 for new residential development. It is therefore considered appropriate that Material Alteration No. 22 (Objective SO9) is included in the proposed variation to safeguard the majority this area (Site B4), whilst providing the appropriate access into the neighbouring lands, Site B5.

Recommendation:

No change to the Proposed Variation is recommended.

2.4 Individual Submissions – Clonmel MD

No submissions received at the Proposed Material Alterations stage of the process.

2.5 Individual Submissions – Carrick-on-Suir MD

No submissions received at the Proposed Material Alterations stage of the process.

2.6 Individual Submissions – Tipperary Cahir Cashel MD

Submission Number: TCC-C7-8	Submission Name: Patrick Ryan	Settlement: Tipperary Town
Submission Summary: This submission is from the landowner of Site TT_2 on the outskirts of Tipperary Town. It has come to the landowners attention that the zoning on this site is being amended from Strategic Reserve to Amenity. The landowner would like the reason for this as he has never known this site to be subject to flooding. The site is so close to Tipperary Town, it should remain 'Strategic Reserve'.		
Consideration: The existing zoning of site TT_2 under the Tipperary Town Development Plan (2013) is 'Agriculture'. Proposed Variation No. 1 published in March 2026 sought to amend the zoning of TT_2 to 'Strategic Reserve'. This is an unmapped watercourse affecting Site TT_2, which has no flood risk identified. In their submission on the Proposed Variation No. 1, the OPR and OPW required the Planning Authority to determine if a stage 3 flood risk assessments is required for Site TT_2 and if necessary, re-zone lands for an appropriate use consistent with the S. 28 Flood Guidelines. Given the strict statutory timeframes associated with the Proposed Variation, the Planning Authority determined that a Stage 3 Flood Risk Assessment cannot be completed within the allowable timeframe. As such, as part of the Proposed Material Alterations, it is proposed to change the zoning of Site TT_2 to Amenity, which is considered a water compatible zoning. Site TT_2 will be revisited as part of the next review of the Tipperary Town zoning map and a Stage 3 Flood Risk Assessment will be undertaken if deemed necessary to support any zoning changes at that time.		
Recommendation: No change.		

Submission Number: TCC-C7-10	Submission Name: Hughes Planning on behalf of Monaghan Mushrooms	Settlement: Tipperary Town
Submission Summary: The submission welcomes the rezoning of lands at Fairgreen Ingredients Warehouse, Knockanrawley, Co. Tipperary for residential uses. The lands are serviced and readily available for re-development and are an excellent example of existing sites that can be quickly released for development in line with the requirements of the Government. The subject lands provide suitable lands which are: • Readily serviceable, with existing access and infrastructure. • Well-located relative to Tipperary Town, Waterford, Limerick, public transport, and community amenities. • Capable of delivering housing at pace, in line with the objectives of the recently issued NPF Implementation: Housing Growth Requirements guidelines. The submission re-iterates that it welcomes the proposed alteration in keeping with the Ministers directive and the shared goal of accelerating housing supply.		
Consideration: This submission is noted. The submission welcomes and supports Proposed Material Alteration - PMA No. 12 which amends the zoning of land in Knockanrawley (Site Ref: TT_14) to 'New Residential'.		
Recommendation: No change.		

Submission Number: TCC-C7-34	Submission Name: Tom Philips & Associates on behalf of Melclon Unlimited Company	Settlement: Cashel
Submission Summary: This submission is made in respect of 35.53ha of serviced lands at Coopers Lots, Cashel and generally welcomes the proposed material alterations as they relate to lands at Coopers Lot, particularly the proposed re-zoning of lands from Strategic Reserve to New Residential (Site CS_22). This submission seeks the revocation of the Strategic Reserve land use zoning for part of the remaining lands to the south (Site Ref: CS_23) to provide for an area of 'New Residential' lands of c. 4.81ha and retention of 'Strategic Reserve' lands of 2.63ha. The figure below illustrates the proposed overall zoning sought for the subject lands with a masterplan included:		

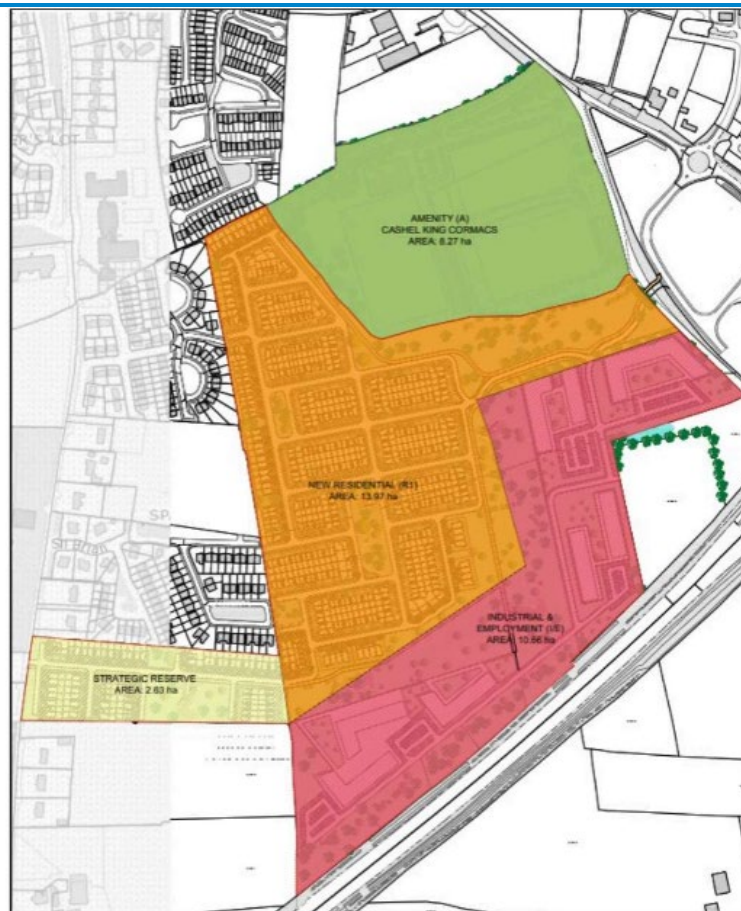


Figure 4.1: Overlay of the Cooper's Lot Masterplan and Proposed Material Alterations Land Use Zoning prepared by Darmody Architecture

The submission welcomes the consideration provided in the CE Report in respect of the subject lands at Coopers Lot, Cashel. The submission notes that the Serviced Land Assessment now identifies Sites CS_22 and CS_23 as 'Tier 1' sites – being serviced and readily developable for residential development. It is noted that CS_16 (c. 4.7ha) has been downgraded to Tier 2 lands. A detailed Masterplan accompanied the original submission to Proposed Variation No. 1 and has been subsequently updated to reflect the Proposed Material Alterations and the additional New Residential zoning sought in respect of CS_23 (see above).

The submission reiterates that the lands are accessible from the existing road and footpath network; within a 15-minute walk of Cashel town centre; are serviced by water and foul sewer as confirmed by Uisce Eireann and would provide a natural extension to the town and reinforce the compact growth of the town in a sequential manner.

The submission welcomes the decision of the Council to propose the CS_22 parcel as 'New Residential' but submits that the CS_23 parcel should also be considered to accommodate residential development under the current CDP, to allow the development of the residential lands in tandem with the Amenity and Industrial zoned lands surrounding them. The additional amount of 'New Residential' zoning (c. 4.81 ha) which generally replaces CS_16 (c. 4.7ha) which was initially proposed as New

Residential in the Draft Variation and is now proposed as Strategic Reserve in the Proposed Material Alterations.

Tipperary County Council should be cognisant of the fact that the Planning and Development (Amendment) Bill 2026, which is due to be enacted shortly, will effectively add an additional 2no. years to the current Development Plan and the necessary requirement to ensure there is sufficient zoned lands to facilitate the requirements of extended Development Plan period.

Consideration:

This submission is noted. While it is argued that the inclusion of a further 4.81ha for New Residential development would counteract the 4.7ha changed to Strategic Reserve as part of the Proposed Material Alteration (CS_16), this does not factor the additional land included as CS_22 (9.07 ha) which would increase the amount zoned as 'New Residential' by 4.37 ha should the additional parcel be zoned.

As detailed in the updated Core Strategy table published as part of the Proposed Material Alterations, there is sufficient 'New Residential' zoned land available in the Cashel to cater for the future growth of the town. It should also be noted that the updated Core Strategy provides for population and housing growth up to 2031, which will cover the period of the existing CDP and any time extension of same.

It is considered that the lands included in the Proposed Material Alterations represent an opportunity for an ambitious proposal for the development of lands at Cooper's Lot. TCC looks forward to working together in the preparation of a detailed masterplan for the site including a phasing plan for lands zoned New Residential and Strategic Reserve (see Recommendation regarding the preparation of a Masterplan under the submission received from the OPR – Sub No. TCC-C7-38).

Recommendation:

No change.

2.7 Late Submissions

Submission Number: Late Submission 1	Submission Name: Lynda Christian	Settlement: Ballina
Submission Summary: This submission is made in respect of PMA No. 22 in respect of Objective SO9 and associated with Site B_4 in Ballina. The submission requests: • Delete Material Alteration No. 22 (Objective SO9) so no access road is routed through the B_4 green area. This would leave the new housing zoning on Site B_5 fully in place. • If the Council will not delete it, then change SO9 so that the new houses are accessed from somewhere other than through B_4 green area. The issues raised in the submission can be summarised as follows: • Under the parent planning permission (File PLC/19657), the B_4 strip was specifically set aside and protected as a "Nature Trail and Riverside Amenity Area". The planning authority's assessment of the 2007 planning application for three extra houses confirms that this same green area was the open space being relied on to justify that decision. Building a road through it would contravene both planning permissions. • There appears to be another possible access route to Site B_5 from the north that does not go through any existing estates. This alternative access should be considered. • It is a safety risk, especially for children due to construction traffic and increased residential traffic. There is no traffic or road-safety assessment showing this has been properly considered, including for emergency vehicle access. • It would destroy trees, hedgerows and wildlife habitat. B_4 contains mature oak trees and hedgerows that are used by protected bat species and other wildlife. The Council's own environmental reports for this plan already flag the loss of this hedgerow and tree cover as a likely significant effect. Building a road through it directly conflicts with the Council's own policies to protect local biodiversity corridors. • It may increase the risk of flooding as B_4 contains a mature drainage ditch that helps water soak away and protects homes from surface-water flooding.		

Submission Number: Late Submission 2	Submission Name: Health Service Executive (HSE) – National Environmental Health Service	Settlement: N/A. State Body
Submission Summary: <u>Population Health</u> The Material Alteration should fit the vision of the Healthy Ireland Framework “<i>where everyone can enjoy physical and mental health wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone’s responsibility</i>”. NEHS recommends that the planning department consider the remit of Healthy Ireland and relevant health supporting policies, strategies and plans including the latest National Climate Action Plan 2025 (CAP25) and the National Climate Change Risk Assessment (NCCRA) published by EPA in June 2025. <u>Homes and Communities</u> The main PMAs include the following changing of land zoned as: • Town Environs or Strategic Reserve to New Residential • New Residential to Amenity • New Residential or Amenity to Community Services and Infrastructure. A sustainable community should support the vision of the Healthy Ireland Framework. The NEHS recommends that priority is given to Age Friendly Homes. Such development has the potential to generate positive effects on population and human health, material assets and climate through the provision of community facilities. Such development also has the potential to generate positive effects on biodiversity and visual amenity, where development proposals include biodiversity enhancement measures or are sensitively designed. <u>Movement and Transportation</u> A focus on specific actions and targets that facilitate and encourage behavioural change in the commuting habits of its population is recommended by the NEHS, with the National Cycle Policy framework and Smarter Travel Policy strategies taken into consideration Electric Vehicles - Planning for both public charging infrastructure and charging infrastructure for residents of all type of homes is recommended. <u>Green and Blue Infrastructure</u>		

It is noted that under the PMA there is considerations been given to open spaces and amenities.

The NEHS recognises that this infrastructure supports the Healthy Ireland plan by encouraging the local community to develop programmes that support healthy lifestyles for adults and children.

Strategic Flood Risk Assessment

A Strategic Flood Risk Assessment (SFRA) was carried out as part of the Strategic Environmental Assessment and recommends that 'A precautionary approach should be applied to flood risk management. It is noted in the SFRA that Plan - Making Justification Tests are not required for any of the proposed rezonings.

Infrastructure and Services

The provision of necessary infrastructure and services should be a consideration as part of increased housing developments leading to an increase in population. These include utilities, services (shops, community hall, library medical and dental facilities), schools, childcare facilities, cycle lanes and facilities to encourage safe active travel, access to public transport, greens spaces and amenities for recreation.

Conclusion:

Delivering sustainable housing in line with the principles of compact growth and sequential development may generate positive effects on Population and Human Health, Climate and Material Assets. The NEHS makes the following recommendations regarding this proposal:

- The proposed amendments support/promote development which may generate a range of effects including cumulative effects such as dust, noise, visual effects, construction traffic, construction waste generation, land-take, effects on biodiversity, flora and fauna, habitat loss etc. Mitigation measures to prevent negative effects on environmental and public health are necessary throughout each stage of implementation as per relevant regulations and guidance.
- NEHS recommend that Tipperary Planning Department keep the provision of green and community areas in line with the objectives of Healthy Ireland and CAP25.

Submission Number: Late Submission 3	Submission Name: John Egan on behalf of Denis Ryan & Mid-West Sand and Gravel Ltd	Settlement: Templemore
Submission Summary: This is a supplementary submission to submission no. TCC-C7-9 to support the re-zoning of land for residential use at Manna South, Templemore. The submission includes an email from the OPW and an accompanying map. The OPW email advises that the map (below) is the Benefitting Land Map for Templemore FRS. The hatched area is the area / land that is deemed to benefit from the completed flood relief scheme. The scheme was designed to provide protection from the 1% AEP Flood. The email advises that the official "Defended Area" maps are not available for this scheme as of yet. It is submitted that the lands in question at Manna South are benefiting lands as a result of the works. The map displays a geographical area with various land parcels. A significant portion of the central and right-hand side of the map is covered by red diagonal hatching, which the legend identifies as 'BENEFITTING LANDS'. A blue dashed line, labeled 'MODEL EXTENT BOUNDARY', runs diagonally across the map. Several locations are labeled: 'WOODVILLE Woodville' at the top, 'KYLEBEG An Chloí Bheag' in the center-right, 'ROCKYHALL Falls in Mucraigh' on the left, and 'FERREST An Seiscarn' at the bottom left. To the right of the map is a legend with two entries: 'MODEL EXTENT BOUNDARY' with a blue dashed line symbol and 'BENEFITTING LANDS' with a red hatched line symbol. Below the legend is a table of contents with multiple rows of text, including 'Table of Contents', '1. Introduction', '2. Background', '3. Flood Relief Scheme', '4. Benefiting Lands', '5. Conclusion', and '6. References'. At the bottom right of the map area, there are logos for 'OPW' and 'Flood Confirmation' with the date '2022/08/04'.		