



Comhairle Contae Thiobraid Árann
Tipperary County Council

Chief Executive Report

Part 1

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

May 2026



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PART 1

1.0 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. This report provides a summary of the 114 submissions received during the public consultation process and provides the Chief Executive's considerations and recommendations on the submissions received.

4 late submissions were received after the statutory consultation period had ended. These submissions are listed and summarised in this report for reference only. No consideration and recommendation from the Chief Executive is required or provided on these submissions.

1.2 Format of the Report

The report is set out over two parts:

- Part 1 sets out the process, legislative requirements, submissions received and the consideration and recommendations on these submissions.
- Part 2 provides a detailed list of all recommended changes to the Proposed Variation No. 1 arising from the consideration of submissions received.

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 Proposed Variation, and no later than 8 weeks after the publication of the Proposed Variation i.e. no later than 15 May 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 Proposed Variation No. 1 was available to view and make submissions from 20 March 2026 to 20 April 2026. In addition to the statutory requirements, and to further make statutory bodies, local organisations, landowners and the local community aware of the Proposed Variation No. 1, the following was undertaken:

- Five public consultation drop-in event were held in the five MD’s as follows:

Venue	Date	Time
Nenagh Library	Tuesday, March 31st	3pm-7pm
Clonmel Library	Wednesday, April 1st	3pm-7pm
Thurles Library	Tuesday, April 7th	3pm-7pm
Carrick-on-Suir Library	Wednesday, April 8th	3pm-7pm
Tipperary Town Library	Tuesday, April 14 th	3pm-7pm

- The Public Participation Network (PPN) circulated details of the process to their members;
- Targeted letters (emails) were sent to relevant bodies and landowners who had previously expressed an interest in the Proposed Variation;

- A dedicated webpage was published on the Tipperary County Council consultation portal;
- Regular updates and reminders were posted on the Council's social media pages;
- Posters were erected the local libraries;
- Articles on the Proposed Variation consultation were published in the local press.

1.5 Environmental Assessment and Strategic Flood Risk Assessment

The Proposed Variation has been subject to Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. As a result of these processes the following reports were published in support of Proposed Variation No. 1:

- Strategic Environmental Assessment Environmental Report,
- Appropriate Assessment Natura Impact Report, and
- Strategic Flood Risk Assessment.

Section 58(13)(b) and (c) of the Act requires a determination to be made as to whether Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) is required in respect of any proposed material alteration of the Proposed Variation. This process will be undertaken once the proposed material amendments are finalised following the Plenary Meeting on 8th June 2026.

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 8th June 2026.

As Material Alterations are recommended by the Chief Executive to the Proposed Variation, a further period of public consultation for a minimum of 4 weeks is required. This is subject to the agreement of the Elected Members. Publication of the Proposed Material Alterations to the Proposed Variation No. 1 would take place from Friday 19th June to Monday 20th July 2026, if agreed. This is subject to proposed Material Alterations being 'screened out' for 'Strategic Environmental Assessment' and 'Appropriate Assessment' i.e. that the local authority does not consider that one of more of the proposed material alterations requires a full 'Strategic Environmental Assessment' or 'Appropriate Assessment'.

2.0 Submissions Received

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

No.	Name	Submission Type
TCC-C1-VAR1-3	Kilkenny County Council	<u>Statutory Consultees, State Bodies, other Government Departments and Other Bodies (15)</u>
TCC-C1-VAR1-7	Maritime Area Regulatory Authority (MARA)	
TCC-C1-VAR1-11	Transport Infrastructure Ireland (TII)	
TCC-C1-VAR1-15	OPW Flood Risk Management	
TCC-C1-VAR1-18	Environmental Protection Agency (EPA), SEA Section	
TCC-C1-VAR1-21	Uisce Éireann	
TCC-C1-VAR1-78	Office of the Planning Regulator	
TCC-C1-VAR1-83	Department of Housing, Local Government & Heritage	
TCC-C1-VAR1-89	Tramore House RDO / ARUP	
TCC-C1-VAR1-91	National Transport Authority	
TCC-C1-VAR1-93	ARUP on behalf of Tipperary Co Co	
TCC-C1-VAR1-95	Department of Education and Youth	
TCC-C1-VAR1-96	Electricity Supply Board	
TCC-C1-VAR1-99	Construction Industry Federation	
TCC-C1-VAR1-100	An Taisce	
Thurles MD		<u>Individual Submissions (99)</u>
TCC-C1-VAR1-1	Sinead Maher	
TCC-C1-VAR1-10	Two Mile Borris Community Development and Tidy Towns Ltd	
TCC-C1-VAR1-55	Richard Foley Panning Consultancy on behalf of Coolross Homes Ltd.	
TCC-C1-VAR1-57	David Commins	
TCC-C1-VAR1-63	Patrick Delaney	
TCC-C1-VAR1-64	Sarah Fitzgerald	
TCC-C1-VAR1-90	Bluett & O'Donoghue on behalf of Fintan Murphy	
Nenagh MD		
TCC-C1-VAR1-2	Cormac Williams	

TCC-C1-VAR1-4	Tony McCormack	
TCC-C1-VAR1-5	Hutch O'Malley	
TCC-C1-VAR1-8	Lough Derg Marina Limited	
TCC-C1-VAR1-12	Pat Keating	
TCC-C1-VAR1-14	Tipperary County Council Nenagh MD	
TCC-C1-VAR1-20	McGill Planning on behalf of Christopher Lind	
TCC-C1-VAR1-22	Tom Harty	
TCC-C1-VAR1-25	Daniel Purcell	
TCC-C1-VAR1-30	ClIr Louise Morgan Walsh & Deputy Alan Kelly TD on behalf of Robert Bourke	
TCC-C1-VAR1-31	ClIr Louise Morgan Walsh & Deputy Alan Kelly TD on behalf of Robert Bourke	
TCC-C1-VAR1-33	Triona Campbell	
TCC-C1-VAR1-34	Ciara Dee	
TCC-C1-VAR1-35	Karl Clarke	
TCC-C1-VAR1-36	Gerard O'Mahony	
TCC-C1-VAR1-37	Paddy and Johanna Coleman	
TCC-C1-VAR1-39	Eamonn Power	
TCC-C1-VAR1-40	Caroline Eldridge	
TCC-C1-VAR1-41	Steve Coakley	
TCC-C1-VAR1-42	Marese Coakley	
TCC-C1-VAR1-43	Eoin Cleary	
TCC-C1-VAR1-44	Helena Guerin	
TCC-C1-VAR1-48	Frank Hogan	
TCC-C1-VAR1-49	Edward Gleeson	
TCC-C1-VAR1-50	MKO on behalf of Denis and Mary Haverty	
TCC-C1-VAR1-51	HRA Planning on behalf of Werdna Limited	

TCC-C1-VAR1-52	Cllr Louise Morgan Walsh on behalf of Tom Harty
TCC-C1-VAR1-53	Liam Rainford
TCC-C1-VAR1-54	Vincent O'Neill
TCC-C1-VAR1-65	Amanda Stephens
TCC-C1-VAR1-66	Brock McClure on behalf of Double Property Group Ltd.
TCC-C1-VAR1-68	Stephen Conroy
TCC-C1-VAR1-70	Cullenagh Residents Committee
TCC-C1-VAR1-71	James Coghlan
TCC-C1-VAR1-79	Paul Hegarty
TCC-C1-VAR1-80	Cormac Williams
TCC-C1-VAR1-81	Hutch O'Malley on behalf of Edward Gleason, Jim Benson & Sheamus O'Donovan
TCC-C1-VAR1-82	Hutch O'Malley on behalf of Leslie Shaw
TCC-C1-VAR1-86	Brendan Sheehan
TCC-C1-VAR1-88	Kieran Keeney
TCC-C1-VAR1-94	Cillian Boyle
TCC-C1-VAR1-101	Michael Minogue
TCC-C1-VAR1-102	Patrick Rohan
TCC-C1-VAR1-103	McKeoghs Hardware
TCC-C1-VAR1-104	Zaklina Flis
TCC-C1-VAR1-105	Tomak Marack
TCC-C1-VAR1-106	Chiara Keeney
TCC-C1-VAR1-107	The Wooden Spoon
TCC-C1-VAR1-108	Freddy McInerney
TCC-C1-VAR1-109	Cllr Dr. Phyll Bulger
TCC-C1-VAR1-110	Albert Purcell

TCC-C1-VAR1-111	Michael Gleeson
TCC-C1-VAR1-112	PJ Caplis
TCC-C1-VAR1-113	Mairéad O'Neill
TCC-C1-VAR1-114	Bernadette Hurley
Clonmel MD	
TCC-C1-VAR1-6	Will McGarry & Associates on behalf of Carmac Investments
TCC-C1-VAR1-23	Ken Hogan
TCC-C1-VAR1-27	Donal McGrath
TCC-C1-VAR1-32	Tyrone O'Donnell
TCC-C1-VAR1-85	Michael O'Donnell
TCC-C1-VAR1-46	Michael Ryan
TCC-C1-VAR1-61	Conroy Architects on behalf of Kieran Ryan
TCC-C1-VAR1-98	K-Plan Community Centre CLG
Carrick-on-Suir MD	
TCC-C1-VAR1-28	Jane Holohan
TCC-C1-VAR1-29	Conroy Architects on behalf of JSF Property Holding Limited
Tipperary / Cahir / Cashel MD	
TCC-C1-VAR1-9	Kay Crowe on behalf of Bernadette Kiely
TCC-C1-VAR1-13	Maurice Casey
TCC-C1-VAR1-19	Bryan McCarthy & Associates on behalf of Maurice Casey
TCC-C1-VAR1-16	Patrick Meagher
TCC-C1-VAR1-17	English Tarmac Limited
TCC-C1-VAR1-24	William Fitzgibbon
TCC-C1-VAR1-26	Tom Phillips & Associates on behalf of Melclon Unlimited Company
TCC-C1-VAR1-38	Louise Ryan
TCC-C1-VAR1-45	Thomas Meagher
TCC-C1-VAR1-47	Michael Crosse

TCC-C1-VAR1-56	Michael Keating on behalf of Ronan Walsh	
TCC-C1-VAR1-58	Michael Keating	
TCC-C1-VAR1-59	Michael Keating	
TCC-C1-VAR1-60	Michael T Halley	
TCC-C1-VAR1-62	Catherine McCraith	
TCC-C1-VAR1-67	Marie Murphy	
TCC-C1-VAR1-69	Patrick O'Dwyer	
TCC-C1-VAR1-72	Miriam Halley	
TCC-C1-VAR1-73	Patrick J Noonan	
TCC-C1-VAR1-74	Joseph Finn	
TCC-C1-VAR1-75	Hughes Planning and Development Consultants on behalf of Monaghan Mushrooms	
TCC-C1-VAR1-76	Marie Murphy	
TCC-C1-VAR1-77	Michael Keating	
TCC-C1-VAR1-84	Michael Keating	
TCC-C1-VAR1-87	Lumi Homes	
TCC-C1-VAR1-92	Jamie O'Sullivan	
TCC-C1-VAR1-97	Gary Pierse	

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	Patrick & Edel Dwyer	Twomileborris
Late Submission 2	Killaloe Consultants Ltd on behalf of Robert O'Connor	Ballina
Late Submission 3	Hutch O'Malley Consulting Engineers on behalf of Singland Homes	Newport
Late Submission 4	DH Ryan Architects on behalf of Pat Hayes	Thurles

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

<p>Submission Number: TCC-C1-VAR1-78</p>	<p>Submission Name: Office of the Planning Regulator (OPR)</p>
<p>Submission Summary:</p> <p>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 a request for further information, clarity or justification of particular provisions.</p> <p>The Office welcomes the updated Core Strategy Tables. While the Office supports the proposed rezoning of land for residential development at separate locations across the County, the Office recommends that the approach to zoning in Cahir is reviewed. The Office notes the serviced land assessment for proposed land use zonings accompanying the proposed Variation, and welcomes completed and planned improvements to wastewater provision in the county since the adoption of the CDP. The Offices recommends amendments to the SFRA.</p> <p>Two recommendations were identified in the submission under the following headings.</p> <p>1. Residential zoned lands – Cahir</p> <p>The Office considers that the land identified for zoning in Cahir are generally well located. The Office encourages the Planning Authority to consider zoning site CH_3 as New Residential as its serviced, well located and close to the town centre.</p> <p>In contrast, site CH_7 which is located immediately to the north of the wastewater plant, is proposed to be zoned New Residential. The accompanying Serviced Land Assessment identified CH_7 as inconsistent with the principles of compact growth and sequential development. There is no clear rationale for the proposed zoning objective when significant areas of land that are located closer to the services and amenities of the town are unzoned.</p> <p><u>Recommendation 1 – Compact and sustainable growth of Cahir</u></p> <p>Having regard to the compact and sequential growth of Cahir and having considered:</p> <ul style="list-style-type: none"> • NPO 7 of the NPF to ensure compact growth and sequential patterns of growth; • RPO 10 and RPO 35 of the RSES relating to the delivery of compact growth; and 	

- the policy and objectives of the Development Plans, Guidelines for Planning Authorities (2022) that planning authorities adopt a sequential approach when zoning lands for development,

the Office recommends that the Planning Authority review the approach to zoning additional lands for residential development in particular to consider:

- (i) zoning the CH_3 lands as New Residential; and
- (ii) omit proposed rezoning CH_7 and review alternative options for New Residential land use zonings closer to the town centre.

2. Flood Risk

The Office welcomes the preparation of the SFRA and the overlaying of flood risk mapping on the land use zoning maps and the site flood risk summary provided in Table 2 of the SFRA.

Site TM_1 in Templemore is identified as being in Flood Zone A and is proposed to be Town Environs. The Office does not consider the zoning objective water compatible and recommends the zoning objective for site TM_1 is amended.

The Office recognises the inclusion of future scenario mapping illustrating the potential future effects of climate change and would welcome the addition of accompanying text in the SFRA to address the findings in relation to sites CG_2, KL_7, B_6, F_2, TT_4, TT_6, T_1 and N_3, adopting a precautionary approach in accordance with the flood guidelines.

The Office welcomes the inclusion of unmapped watercourses on or adjacent to sites TT_2 and TT_3 in Tipperary Town. The Planning Authority should review if Stage 3 Flood Risk Assessments are required to inform the land use zonings and the SFRA.

The Office considers that the mapped flood extents of historic flood events should be addressed in the SFRA in relation to sites B_1, B_6, C_9 and T_3 to demonstrate that the proposed zoning objective is reasonable and any identified flood risk is mitigated.

The Office considers Sustainable urban Drainage Systems, incorporating nature-based solutions, should be included in the SFRA for key development sites and guidance provided on the types of measures that are considered appropriate.

Recommendation 2 – Flood Risk Management

Having regard to flood risk management, and having considered:

- NPO 78 of the NPF to take account of the potential impacts 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 Office recommends that the Planning Authority:

- (i) ensures the zoning objective for site TM_1 within Flood Zone A is limited to water compatible uses, or alternatively that a Plan Making Justification Test is carried out prior to zoning the land for highly or less vulnerable uses in accordance with the Flood Guidelines;
- (ii) amends the Strategic Flood Risk Assessment (SFRA) to include text to address the findings of the future scenario maps to mitigate risk on identified sites, namely CG_2, KL_7, B_6, F_2, TT_4, TT_6, T_1 and N_3, adopting a precautionary approach;
- (iii) determines if stage 3 flood risk assessments are required for sites TT_2 and TT_3 lands along either side of unmapped watercourses which have no flood risk extents illustrated on the flood zone mapping. If required, the Planning Authority should undertake stage 3 flood risk assessments and if necessary, re-zone lands for an appropriate use consistent with the Flood Guidelines.
- (iv) ensures the mapped extents of historic flood events are considered in the SFRA in relation to sites B_1, B_6, C_9 and T_3; and
- (v) ensures the management of surface water runoff in the development of key sites is in accordance with Sustainable urban Drainage Systems (SuDS), including nature-based solutions. These sites should be identified in the SFRA and necessary guidance provided on the applicability of different SuDS techniques.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

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

Consideration:

Recommendation 1 – Compact and sustainable growth of Cahir

In accordance with the OPR's recommendation, it is proposed to change the zoning of CH_3 to New Residential and to change the zoning of CH_7 to Town Environs. The Core Strategy Table and Serviced Land Assessment has been updated to reflect the proposed changes.

Recommendation 2 – Flood Risk Management

A response to this recommendation is set out in Appendix A of the revised SFRA which forms part of the CE Report.

Point (i) – Noted and accepted. It is proposed to change the zoning of Site TM_1 to Amenity, which is considered a water compatible zoning. See Appendix A of the revised SFRA which forms part of the CE Report for further details.

Point (ii) – Noted. Each of the highlighted sites (namely CG_2, KL_7, B_6, F_2, TT_4, TT_6, T_1 and N_3) have been reviewed in relation to the High-End Future Scenario predicted flood extents (NIFM, NCFHM, CFRAM). See Appendix A of the revised SFRA which forms part of the CE Report for further details. It should be noted that Site TT_6 is now proposed to be zoned 'Amenity' (on foot of Submission No. 92) which is a water compatible zoning.

Point (iii) – Noted. Given the strict statutory timeframes associated with the Proposed Variation, a Stage 3 Flood Risk Assessment cannot be completed within the allowable timeframe. As such, it is proposed to change the zoning of Site TT_2 to Amenity, which is considered a water compatible zoning. It is proposed to change the zoning of Site TT_3 to Strategic Reserve. Based on the standardised zonings being applied to zoning maps as part of the Proposed Variation, the zoning of the site cannot be directly reverted back to New Residential Phase 2, which is the existing zoning of the site. Strategic Reserve is the nearest equivalent to 'New Residential Phase 2' in the proposed zoning objectives / zoning matrix. The SFRA is amended to reflect these changes. Site TT_2 and TT_3 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. See Appendix A of the revised SFRA which forms part of the CE Report for further details.

Point (iv) – Noted. For sites B_1, B_6, C_9 and T_3, the historic flood risk has been appropriately considered as part of the zoning. See Appendix A of the revised SFRA which forms part of the CE Report for further details.

Point (v) – A response to nature-based solutions and SuDS is provided in Appendix A of the revised SFRA which forms part of the CE Report.

Recommendation:

- Amend the zoning of CH_3 to New Residential (See Amendment 14 and 33 in Part 2)
- Amend the zoning of CH_7 to Town Environs. (See Amendment 15 and 33 in Part 2)
- Amend the zoning of TM_1 to Amenity. (See Amendment 16 in Part 2)
- Amend the zoning of TT_2 to Amenity (See Amendment 8 and 31 in Part 2)
- Amend the zoning of TT_3 to Strategic Reserve (See Amendment 9 and 31 in Part 2)
- Update the SFRA to address Recommendation 2 from the OPR (See Amendment 41 in Part 2)

Submission Number:

TCC-C1-VAR1-3

Submission Name:

Kilkenny County Council

Submission Summary:

Kilkenny County Council note the contents of the Proposed Variation No. 1 and have no comments to make on the Proposed Variation.

Consideration:

As an adjoining local authority, Kilkenny County Council were notified of Proposed Variation No. 1. The submission is welcomed and noted.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-7

Submission Name:

The Maritime Area Regulatory Authority (MARA)

Submission Summary:

As a Coastal Planning Authority, Tipperary County Council has a statutory obligation to ensure the development plan is materially consistent with the National Marine Planning Framework. MARA note that none of the proposed zoning alterations directly impact on the Maritime area and as such are satisfied that it will not directly interact with or impact the maritime area. On this basis, MARA have no further comments to make. The submission includes additional information on Foreshore Consents and Marine Usage Licences.

Consideration:

The submission is noted.

Recommendation:

No change to the Proposed Variation is recommended.

<p>Submission Number: TCC-C1-VAR1-11</p>	<p>Submission Name: Transport Infrastructure Ireland (TII)</p>
<p>Submission Summary:</p> <p>TII provides the following observations for the Council’s consideration in the assessment of the Proposed Variation:</p> <p>1. <u>Protection of Alignments for Future National Road Projects</u></p> <p>Section 2.9 of the S. 28 Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities (2012) addresses the protection of alignments for future national road projects. The TII notes a number of proposed alterations within the scheme area of current national road schemes:</p> <p>a) Clonmel Map Amendments</p> <ul style="list-style-type: none"> C-3 Strategic Reserve to New Residential C-9 Community Services and Infrastructure to Strategic Reserve <p>b) Tipperary Town Map Amendments</p> <ul style="list-style-type: none"> TT_1 New Residential Phase 2 to Existing Residential TT_2 Agriculture to Strategic Reserve TT_3 New Residential Phase 2 to New Residential <p>c) Kilsheelan Map Amendments</p> <ul style="list-style-type: none"> KL_1 New Residential to Strategic Reserve KL_3 Agriculture to Strategic Reserve KL_4 New Residential to Strategic Reserve <p>The proposed maps amendments identified above are within the scheme area identified for the N24 Waterford to Cahir Scheme and the N24 Cahir to Limerick Junction Scheme. TII is concerned that it is not clear from the Proposed Variation that the implications of the zoning amendment proposals on these road schemes have been considered and addressed. TII requests a review of the above identified mapping amendments to ensure that the NDP schemes are safeguarded in accordance with the S. 28 Guidelines, the NPF and the NDP.</p> <p>TII strongly recommends clarification, and potentially amendment, relating to this matter prior to any decision to adopt Proposed Variation No. 1. TII would also recommend and expect consultation with the Councils national roads project teams.</p>	

2. Required Development Plan Policy on Access to National Roads

Section 2.5 of the S. 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities (2012) addresses the required development plan policy on access to national roads. TII recognises that the requirement of this policy is reflected in Policy 12-4 of the adopted Development Plan. TII identifies the following aspects of the Proposed Variation, that require review:

a) Borrisokane Town Map Amendments

In respect of Mapping Amendment BO_1 and BO_2, TII recommends that the zoning proposals are reviewed and amended to clarify that access proposals will be developed to ensure compliance with the provisions of official policy and Policy 12-4 of the adopted Development Plan.

b) Proposed Amendment No. 11 to insert new policy 5-17

TII notes that several settlement plan maps include 'Town Environs' zoned lands along national roads outside where reduced 50-60 kph urban speed limits applies. In accordance with Section 2.5 of the S. 28 Guidelines and Policy 12-4 of the adopted Development Plan, access to national roads in such circumstances conflicts with the provision of official policy. TII recommends an appropriate cross reference between proposed Policy 5-17 and Policy 12-4.

Consideration:

The content of this submission is noted.

Protection of Alignments for Future National Road Projects

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).

The Mid-West Roads Regional Design Office and the Tramore House Regional Design Office were both consulted as part the Proposed Variation and ARUP has made submissions on behalf of both the N24 Waterford to Cahir Scheme (Submission No. 93) and the N24 Cahir to Limerick Junction Scheme (Submission No. 89).

In respect of specific sites raised in the submission, the following is provided:

Clonmel Map Amendments

C_3 Strategic Reserve to New Residential – It is proposed to amend the zoning of the southern portion of this site to ‘Amenity’ (Site C_3a) to protect the route corridor and urban links of the N24 Project. It is considered that the northern section of the site does not directly conflict with planned urban roads and the existing policies contained in the TCDP will ensure the protection of the N24 project.

C_9 Community Services and Infrastructure to Strategic Reserve – These lands abut the existing N24 and the existing policies contained in the existing TCDP will ensure the protection of the N24 project. See also commentary on Strategic Reserve zoning below.

Tipperary Town Map Amendments

TT_1 New Residential Phase 2 to Existing Residential – This zoning change is to reflect that that site has been developed and accommodates the Rosefield housing development.

TT_2 Agriculture to Strategic Reserve – On review, it is considered appropriate to rezone this site to Amenity on foot of the submission from the OPR and OPW in respect of flood risk (See Amendment No. 8 and 31 in Part 2).

TT_3 New Residential Phase 2 to New Residential - On review, it is considered appropriate to rezone this site to Strategic Reserve on foot of the submission from the OPR and OPW in respect of flood risk (See Amendment No. 9 and 31 in Part 2). Based on the standardised zonings being applied to zoning maps as Part of the Proposed Variation, Strategic Reserve is the nearest equivalent to ‘New Residential Phase 2’, which is the existing zoning of the site. See also further commentary on Strategic Reserve zoning below.

Kilsheelan Map Amendments

KL_1 New Residential to Strategic Reserve - See commentary on Strategic Reserve zoning below.

KL_3 Agriculture to Strategic Reserve - See commentary on Strategic Reserve zoning below.

KL_4 New Residential to Strategic Reserve - See commentary on Strategic Reserve zoning below.

As set out in the Variation, it is not the intention that SR land would be available for immediate development under the current Development Plan. Rather, activation of these lands will be subject to compliance with certain criteria. Any development proposals on lands zoned Strategic Reserve (SR) would also be subject to other normal planning and environmental considerations including Planning Policy 12-3 of the TCDP.

Required Development Plan Policy on Access to National Roads

Borrisokane Town Map Amendments

Comments in respect of Mapping Amendment BO_1 and BO_2 are noted. On review, it is now recommended that these sites are reverted to their existing zoning which is Employment (BO_1) and Agriculture (BO_2). It is also recommended to retain existing Objective SO14 which states:

SO14: Access to lands north east of the village, zoned for Enterprise and Employment and Agricultural uses shall be from the Ballyhayden road only.

Proposed Amendment No. 11 to insert new policy 5-17

TII recommends an appropriate cross reference between proposed Policy 5-17 (Town Environs) and Policy 12-4 in respect of town environs and access to national roads. This is not considered necessary as both policies will mutually co-exist in the TCDP.

Recommendation:

- Amend the zoning of Site BO_1 in Borrisokane to Employment (existing zoning). (See Amendment 19 and 36 in Part 2).
- Amend the zoning of Site BO_2 in Borrisokane to Agriculture (existing zoning). (See Amendment 19 and 36 in Part 2).
- Revert Policy SO14 (as it relates to the settlement of Borrisokane in Volume 2 of the TCDP) back to its existing wording. (See Amendment 20 in Part 2).
- Amend the zoning of the southern section of C_3 to Amenity (Site C_3a) (see Amendment 2 and 27 in Part 2).

Submission Number: TCC-C1-VAR1-15	Submission Name: Office of Public Works (OPW)
Submission Summary: This submission is made specifically concerning flooding and flood risk management.	
Town Environs Zoning Site TM_1 in Templemore is being rezoned from New Residential to Town Environs. The SFRA comments that the proposed Town Environs zoning is considered water compatible. The land use zoning matrix provided in Table 1.3 of the Variation indicates that Agricultural Buildings / Structures defined as less vulnerable development in the Flood Risk Management Guidelines (2009).	
Nature-based Solutions and SuDS The preparation of development plans should take account of the opportunities, for nature-based solutions. TCC should refer to the Best Practice Interim Guidance Document ‘Nature-based solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas’ as well as the Guidance Document for Planners, Developers and Developer Agents ‘Implementation of Urban Nature-based Solutions’ for further guidance. The Guidelines recommend that SFRA provide guidance on the likely applicability of SuDS at key development site level and also identifies where integrated and area-based provision of SuDS and green infrastructure are appropriate.	
Consideration of Climate Change Impacts TCC should set out how climate change is to be managed on lands that are not currently at risk of flooding but could potentially be at risk in the future as shown by the future scenario extents. In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans. Future scenario risk has been identified at the following amended zonings in the SFRA but it is proposed that this is to be dealt with at development management stage:	
<ul style="list-style-type: none">• Clogheen CG_2 (less vulnerable Agriculture to highly vulnerable Strategic Reserve)• Kilsheelan KL_7 (water compatible Amenity to highly vulnerable New Residential)• Ballina B_6 (water compatible Amenity to highly vulnerable New Residential)• Fethard F_2 (less vulnerable Agriculture to highly vulnerable Strategic Reserve)	

- Tipperary Town TT_4 (highly vulnerable New Residential Phase 2 to highly vulnerable New Residential)
- Tipperary Town TT_6 (highly vulnerable New Residential Phase 2 to highly vulnerable New Residential)
- Thurles T_1 (less vulnerable Town Environs to highly vulnerable Strategic Reserve)
- Nenagh N_3 (less vulnerable Town Environs to highly vulnerable Strategic Reserve)

Unmapped Watercourses

For a number of areas where rezoning is proposed, the EPA flow network data indicates watercourses passing through or adjacent to the lands. These watercourses appear not to have met the criteria for inclusion in either the National CFRAM or the NIFM programme and therefore the OPW has not produced predictive flood risk extents for these watercourses. The SFRA generally includes commentary that any development proposal at these sites should prepare a Stage 3 SSFRA having regard to the associated flood risk, CC impacts, and IFI guidelines/riparian buffers. TCC should review if Stage 3 flood risk assessments are required to inform the land use zoning and the SFRA. This applies to:

- Tipperary Town TT_2 (less vulnerable Agriculture to highly vulnerable Strategic Reserve)
- Tipperary Town TT_3 (highly vulnerable New Residential Phase 2 to highly vulnerable New Residential)

Historic Flooding

A number of amended zonings appear to be adjacent to or within the extents of historic flood events. While these have been noted in the SFRA, for certain areas detail has not been provided as to how the zonings are considered appropriate in the context of risk identified due to prior flood events at these locations. This applies to the following areas:

- Ballina B_1 (water compatible Amenity to highly vulnerable New Residential) within mapped extents of December 1954 Shannon Flood event
- Ballina B_6 (water compatible Amenity to highly vulnerable New Residential) within mapped extents of December 1954 Shannon Flood event.
- Clonmel C_9 (highly vulnerable Community Services and Infrastructure to highly vulnerable Strategic Reserve) within mapped extents of November 2000 flood event

- Thurles T_3 (Town Environs which allows less vulnerable development to highly vulnerable Strategic Reserve) contains an area indicated to have been inundated in the January 2008 River Suir flood event
- Cashel CS_5 (highly vulnerable Existing Residential to highly vulnerable New Residential) within marked extents of a recorded recurring flood event.
- Cashel CS_6 (highly vulnerable Existing Residential to highly vulnerable New Residential) within marked extents of a recorded recurring flood event.
- Cashel CS_7 (highly vulnerable Existing Residential to highly vulnerable New Residential) within marked extents of a recorded recurring flood event.

Should any changes to zoning designations in areas of flood risk be implemented in the future, it is important that a flood risk assessment to an appropriate level of detail is carried out and that there is appropriate justification for any decisions made as set out in the Guidelines.

Consideration:

A response to this submission is set out in Appendix A of the revised SFRA which forms part of the CE Report.

Town Environs Zoning

Noted. It is proposed to change the zoning of Site TM_1 to Amenity, which is considered a water compatible zoning. See Appendix A of the revised SFRA which forms part of the CE Report for further details.

Nature-based Solutions and SuDS

Noted. A response to nature-based solutions and SuDS is provided in Appendix A of the revised SFRA which forms part of the CE Report.

Consideration of Climate Change Impacts

Each of the highlighted sites (namely CG_2, KL_7, B_6, F_2, TT_4, TT_6, T_1 and N_3) have been reviewed in relation to the High-End Future Scenario predicted flood extents (NIFM, NCFHM, CFRAM). See Appendix A of the revised SFRA which forms part of the CE Report for further details. It should be noted that Site TT_6 is now proposed to be zoned 'Amenity' (on foot of Submission No. 92) which is a water compatible zoning.

Unmapped Watercourses

Noted. Given the strict statutory timeframes associated with the Proposed Variation, a Stage 3 Flood Risk Assessment cannot be completed within the allowable timeframe. As such, it is proposed to change the zoning of Site TT_2 to Amenity, which is considered a water compatible zoning. It is proposed to change the zoning of Site TT_3 to Strategic Reserve. Based on the standardised zonings being applied to zoning maps as part of the Proposed Variation, the zoning of the site cannot be directly reverted back to New Residential Phase 2, which is the existing zoning of the site. Strategic Reserve is the nearest equivalent to ‘New Residential Phase 2’ in the proposed zoning objectives / zoning matrix. The SFRA is amended to reflect these changes. Site TT_2 and TT_3 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. See Appendix A of the revised SFRA which forms part of the CE Report for further details.

Historic Flooding

Noted. For the specified sites (B_1, B_6, C_9 and T_3, CS_5, CS_6 and CS_7), the historic flood risk has been appropriately considered as part of the zoning. See Appendix A of the revised SFRA which forms part of the CE Report for further details. It should be further noted that Sites CS_5, CS_6 and CS_7 in Cashel are currently zoned ‘Existing Residential’ and it is proposed to change the zoning of these sites to ‘New Residential’. There is no change to the general intent of the zoning of these sites.

Recommendation:

- Amend the zoning of TM_1 to Amenity. (See Amendment 16 in Part 2)
- Amend the zoning of TT_2 to Amenity (See Amendment 8 and 31 in Part 2)
- Amend the zoning of TT_3 to Strategic Reserve (See Amendment 9 and 31 in Part 2)
- Update the SFRA to address Recommendation 2 from the OPR and the submission from the OPW (See Amendment 41 in Part 2).

Submission Number:

TCC-C1-VAR1-18

Submission Name:

Environmental Protection Agency (EPA) – SEA Section

Submission Summary:

The submission describes the statutory function of the EPA under the Strategic Environmental Assessment (SEA) Regulations and advises that for plans at county and local level the key

recommendations of guidance document “SEA of Local Authority Land Use Plans - EPA Recommendations and Resources” are considered in finalising the Variation.

The submission advises that the Council ensure the LAP aligns with key relevant higher-level plans and Programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework (NPF) and Southern Regional Spatial and Economic Strategy (RSES).

The submission outlines the content that is required to be contained in the SEA Environmental Report including Mitigation Measures and Monitoring and provides information on SEA related monitoring.

The submission recommends that:

- Ireland’s State of the Environment Report 2024 (EPA, 2024) is considered and integrated as appropriate in finalising the SEA and Variation.
- Any future amendments to the Variations are screened for likely significant effects of the environment.
- An SEA Statement should be prepared once the Variation is adopted and a copy of same sent to environmental authority consulted during the SEA process.

Environmental authorities who should be consulted are listed.

Consideration:

The points made in the submission are noted.

The zoning proposals in the Proposed Variation are subject to the mitigation defined in the Tipperary County Development Plan (TCDP) 2022-2028 which provides protection for various environmental components. These policies and objectives have been cross-referenced in Section 8.2 of the Draft SEA Environmental Report (ER).

An additional policy (Reference 11-20 within the SEA published with the Draft Variation) has been defined and integrated into the Proposed Variation which affords protection to all environmental components by ensuring that the expansion of settlements in County Tipperary is in line with the principles of proper planning and sustainable development, pre-existing environmental protection objectives, and not creating significant adverse cumulative effects on the environment.

With regards to a monitoring programme, a robust framework already exists in the current TCDP. This framework will be applicable for the Proposed Variation, and additional SEOs/monitoring measures have been defined.

This also includes an SEO for population and human health, which is aimed at the delivery of housing and therefore aligned with the National Planning Framework (First Revision) and the Housing Growth Requirements for the County.

The SEA ER and NIR have had regard to the EPA Publications in defining the environmental baselines.

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.

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

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

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:
TCC-C1-VAR1-21	Uisce Éireann (UE)

Submission Summary:

UE had provided the planning authority with an infrastructural assessment of the sites which are being proposed for changes to zoning in advance of the publication of this variation. UE will also provide updates on Uisce Éireann plans and projects as further updates become available.

1. Availability of Water Services

The criteria allowing for development of Strategic Reserve zoned lands is welcomed. However, the Proposed Variation does not update the population targets in the Core Strategy of the CDP. Uisce Éireann relies on population estimates in assessing future capacity available in submissions on the CDP.

The Core Strategy targets go beyond the period covered by Uisce Éireann's next Capital Investment Plan (2025-2029). The additional capacity created by a capital investment, where a project is planned for completion within the next Capital Investment Plan period (2025-2029), has been considered in the latest Water Supply Capacity Registers and Wastewater Treatment Capacity Registers (published in August 2025). Please note that all capital projects are subject to change and potential delays. The Capacity Registers are only an indication of available capacity. It is anticipated that updated Capacity Registers will be available shortly.

The level of available capacity will need to be revisited should a significant increase in overall demand for water services be experienced in settlements. If required, Uisce Éireann can initiate projects to increase capacity, subject to funding in future Capital Investment Plans.

Developers are advised to contact our Developer Services team. Further information is available at <https://www.water.ie/connections/developer-services/>.

1.1 Water and Wastewater Capacity

Water Supply

The latest Water Supply Capacity Register (August 2025) shows that there are currently capacity constraints in the Water Resource Zones serving some of the settlements listed in the Core Strategy tables.

The Water Resource Zones will come under increasing pressure should the total requirement of housing units be developed within the timeframe indicated (up to 2031) – see comment above about the potential initiation of projects to increase capacity.

Wastewater Treatment

The latest Wastewater Treatment Capacity Register (August 2025) shows that there are currently capacity constraints in some settlements, particularly Tipperary Town. Also, currently there is no spare capacity available in Borrisokane, Holycross, and Cloughjordan.

Projects are currently underway for several settlements to increase capacity, including Tipperary Town WWTP, Borrisokane WWTP, Holycross WWTP, and Cloughjordan WWTP.

Water Networks

Uisce Éireann and Tipperary County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities, and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

Wastewater Networks

Uisce Éireann and Tipperary County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc., and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.

We would like to highlight that the recast Urban Wastewater Treatment Directive (UWWTD) includes requirements for the preparation of Integrated Urban Wastewater Management Plans for selected agglomerations greater than 10,000 persons based on risk. The recast UWWTD includes obligations for the reduction of pollution load from both wastewater and storm water systems (Storm Water Overflows and Urban Runoff respectively). The new UWWTD will require collaboration between Uisce Éireann and local authorities on integrated drainage planning.

1.2 Developer Led Infrastructure

Uisce Éireann has developed a Guidance Document, Technical Standard for Nature Based Solutions and Minimum Requirements for Non-Nature Based Solutions to support Developers with the implementation of Developer Led Infrastructure (DLI) in small scale multi-unit housing Developments less than or equal to (\leq)150 Population Equivalent (PE).

Domestic Wastewater discharges (\leq 150 PE) to surface water can now be authorised through a registration system based on compliance with the European Union (Water Policy) Small Wastewater Discharge (Registration) Regulations 2026.

This approach supports the Government's initiative to enable housing activity in areas where there is no existing Uisce Éireann wastewater network and where connection to the Uisce Éireann network is not feasible due to distance. It also maintains the necessary safeguards to ensure that environmental compliance is achieved for discharges from newly constructed eligible development.

Further information, including guidance documents, is available at www.water.ie/connections/developer-services/developer-led-infrastructure.

2. Additional comments and suggestions on the Proposed Variation text

UE request that ‘Public Services’ and ‘Utilities’ should be defined in the zoning matrix definitions and that ‘Public Services and Utilities’ should be permissible uses or open for consideration in all zoning objectives.

UE request that the Environmental Reports are updated to refer to the Water Services Strategic Plan 2050 and to refer to Uisce Éireann (rather than Uisce Eireann).

Consideration:

Introduction

Noted. The infrastructural assessment provided by UE informed the selection of sites for the Proposed Variation. Tipperary County Council welcome continued updates from UE on plans and projects in the county.

Availability of Water Services

It is acknowledged that UE welcome the criteria allowing for development of Strategic Reserve zoned lands. The growth targets contain in the updated Core Strategy are based on the housing targets set for County Tipperary in the S.28 NPF Implementation Guidelines. Tipperary County Council acknowledges that the UE capacity registers play an important role in identifying available capacity as well as capacity constraints in water supply and wastewater treatment in the county. It is acknowledged that level of available capacity will need to be revisited should a significant increase in overall demand for water services be experienced in settlements and that if required, Uisce Éireann can initiate projects to increase capacity, subject to funding in future Capital Investment Plans. TCC will work with Uisce Éireann in this regard.

TCC welcomes the projects that are currently underway for several settlements to increase capacity in wastewater treatment plans, including Tipperary Town WWTP, Borrisokane WWTP, Holycross WWTP, and Cloughjordan WWTP. TCC also welcomes UE’s progress on the water and wastewater network in the county.

TCC will work with Uisce Éireann in respect of the integrated drainage planning under the recast Urban Wastewater Treatment Directive (UWWTD).

Comments on Developer Led Infrastructure are noted.

Additional comments and suggestions on the Proposed Variation text

It is considered that there are sufficient policies in the Tipperary County Development Plan supporting water services infrastructure and it is not required to be included in the zoning matrix.

The Environmental Reports will be updated to refer to the Water Services Strategic Plan 2050 and to Uisce Éireann (rather than Uisce Eireann).

Recommendation:

- Amend the Environmental Reports to refer to the Water Services Strategic Plan 2050 and to Uisce Éireann (See Amendment 39 in Part 2).

Submission Number:

TCC-C1-VAR1-83

Submission Name:

Department of Housing, Local Government and Heritage

Submission Summary:

The Dept. sets out heritage related observations/recommendations co-ordinated by the Development Applications Unit.

Archaeology

The Dept notes that the ‘Service Centres’ maps were the only maps to include recorded monuments and zones of archaeological potential.

The Department notes and lists the recorded monuments (and/or their associated Zones of Notification (ZoN)) that are included in the Proposed Variation No. 1 of Tipperary County Development Plan 2022-2028, which are subject to statutory protection.

The Dept notes the high-level assessment of Cultural Heritage – Archaeological and Architectural components contained in the Draft SEA report and note existing policy 13-4 contained in the existing Tipperary County Development Plan 2022-2028 in relation to the protection of archaeological heritage.

The Dept makes the following recommendations:

Recommendation No. 1

It is recommended that an objective of the Proposed Variation No. 1 should be to protect, in an appropriate manner, all elements of the archaeological heritage and other features of the following categories:

- (a) Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service of the Department of Housing, Local Government and Heritage;
- (b) Monuments and Places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994;
- (c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987;
- (d) National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and National Monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority;
- (e) Archaeological objects within the meaning of the National Monuments Acts;
- (f) Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer/Wreck Inventory of Ireland Database maintained by the National Monuments Service of the Department of Housing, Local Government and Heritage;
- (g) Where, under Section 3 of the National Monuments (Amendment) Act 1987, a place on, in or under the seabed (of the territorial waters) or land covered by water where a wreck or an archaeological object lies or formerly lay;
- (h) Archaeological features not as yet identified but which may be impacted on by development.

Recommendation No. 2

It is recommended that the following areas be reconsidered so as not to include recorded monuments that are subject to statutory protection in the Record of Monuments and Places (RMP):

- 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 / Cahir-DTSP-001
- RMP TS067-003 — Enclosure / TT_2 Strategic Reserve / 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 / Thurles-KTSP-001

Built Heritage

The submission sets out the policy context for Architectural Heritage in respect of assessing the proposed new zonings. This includes the NPF, the Tipperary County Development Plan 2022-2028, and the S. 28 Ministerial Guidelines ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011). The Dept recommends site-specific policies / objectives for the following sites:

- Clonmel – Site C_3, Site C_7 and Site C_9
- Thurles – Site T_2, Site T_3
- Cahir – Site CH_7
- Tipperary Town - TT_3, TT_10 and TT_11
- Cashel – CS_3, CS_9, CS_14
- Fethard- Site F_4
- Borrisoleigh – Site BL_2
- Clogheen – Site CG_1 and Site CG_2
- Cloughjordan – Site CL_2

The local authority’s Architectural Conservation Officer should be assigned responsibility for specific land zoning policies and/or objectives for these sites.

Consideration:

Archaeology

Noted. Recorded monuments and zones of archaeological potential for the Key Towns and District Towns are detailed in their respective Local Area Plans and Town Development Plans. The recorded monuments and zones of archaeological potential are also included on the online public planning mapping viewer.

The Department has recommended a new policy objective in respect of archaeological heritage and to reconsider certain sites for zoning so as not to include recorded monuments.

It is considered that there are sufficient policies in the TCDP in respect of the protection of archaeological heritage. 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. Policy 13-4, 13-5, 13-6 and 13-7 are aimed at safeguarding archaeological heritage assets, including landscapes. These policies also require detailed assessments (e.g., Visual Impact Assessment and Landscape Impact Assessment) for evaluating the potential of likely significant effects on heritage receptors.

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.

It should be noted that Site CH_7 and TT_2 are being rezoned to Town Environs and Amenity respectively, on foot of the OPR's submission (Submission No 78).

Built Heritage

The policy context for architectural Heritage in respect of assessing the proposed new zonings is noted. The Dept recommends site-specific policies / objectives for certain sites in respect of Protected Structures. It is considered that there are sufficient policies in the TCDP in respect of the protection of built heritage, including Protected Structures. 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. The TCDP further requires any new development with the potential to impact on RPS structures to have regard to Architectural Heritage Protection Guidelines for Planning Authorities' (DAHG, 2011). TCC, having regard to the nature and scope of works proposed, may require the submission of an Architectural Impact Assessment and method statements to facilitate the assessment of such development (See Section 13.5 of the TCDP).

The Department's recommendations pertaining to the retention and/or enhancement of established mature vegetation at certain sites are noted. The TCDP states that mature vegetation (trees and hedgerows) are important components of the local landscape, and the protection of such will be a consideration in the assessment of development proposals. This is reflected in Policies 11-4 and 11-17 of the TCDP.

Any lower-tier projects arising out of these zoning proposals shall be subject to the planning application process and any required environmental assessments. Consultations will be undertaken with the Planning and Heritage Division to inform planning assessment and subsequent decision and planning conditions relating to the development proposal. This will be carried out for all proposals with the potential to give rise to effects on heritage assets and to support compliance with legislative conservation requirements and heritage policy contained within the TCDP. This will ensure that appropriate project-level avoidance and mitigation measures are accounted for and therefore ensure the appropriate conservation of heritage assets.

It should be noted that Site CH_7 and TT_3 are being rezoned to Town Environs and Strategic Reserve respectively, on foot of the OPR's submission (Submission No 78).

Recommendation:

- Amend Appendix 3 of the SEA ER (Detailed Evaluation of Environmental Effects) to incorporate the Site-specific baseline details (see Amendment 40 in Part 2)

Submission Number:	Submission Name:
TCC-C1-VAR1-89	Tramore Road Regional Design Office/ ARUP

Submission Summary:

The submission is made in respect of the N24 Waterford to Cahir Project (the Project). ARUP has been appointed to provide multi-disciplinary technical consultancy services for the delivery of Phase 1-4 of the N24 Waterford to Cahir Project.

The purpose of the submission is to ensure that the Proposed Variation of the TCDP accounts for and does not conflict with the Preferred Transport Solution for the Project.

The submission outlines the role of the N24 in relation to regional accessibility and the need for the Project is supported in policy at EU, national, regional and local levels. The submission outlines the relevant policy support in the NPF, the NDP and the Tipperary County Development Plan. The proposed Variation should have regard and fully align itself with national and regional policies and objectives which support the N24 project.

Requests Tipperary County Council to have regard to consider the following lands included in the Proposed Variation which may give rise to conflict or constrain the emerging N24 Project:

Kilsheelan

KI_1, KI_3, KI_4, proposed to be zoned as Strategic Reserve.

The lands are in direct conflict with the PTS and should not be zoned for development. Should Tipperary County Council be minded to zone these lands they should be subject to a specific development objective to have regard to the emerging or proposed N24 Project. These lands should not be brought forward for development prior to completion of the N24 Project up to the submission of an application to An Coimisiun Pleanala.

Clonmel

C_3, C_4, C_10 , C_11 proposed to be zoned for residential development.

C_5, C_7, C_8, proposed to be zoned as Strategic Reserve.

These lands do not conflict with planned urban roads, however the variation should include appropriate development objectives to ensure that development of this site has due regard to the N24 project and emerging design.

C_9 proposed to be zoned as Strategic Reserve.

These lands are abutting the existing N24, and the variation should include appropriate development objectives to ensure that development of this site has due regard to the N24 project and emerging design.

Carrick-on-Suir

COS_1, COS_4 are proposed to be zoned for residential development.

COS_3 proposed to be zoned as Strategic Reserve.

These lands are abutting the PTS and in close proximity to the road corridor. The variation should include appropriate development objectives to ensure that development of this site has due regard to the N24 project and emerging design.

Consideration:

The content of this submission is noted. The strategic importance of the N24 and the N24 Waterford to Cahir Project is 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.*" It is

considered that these existing policies contained in the existing TCDP will ensure the protection of the N24 project.

Concerns raised regarding lands proposed to be zoned Strategic Reserve that are within the PTS are noted. KI_1 and KI_4 are proposed to be rezoned from New Residential to Strategic Reserve. 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. The Variation inserts the following text in 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.

The variation proposes a change to facilitate appropriate development proposals on lands zoned Strategic Reserve (SR) under certain limited circumstances and this is subject to other planning and environmental considerations including Planning Policy 12-3.

See response and recommendation for Submission TCC-C1-VAR1-11, TII, for consideration of site C_3.

Recommendation:

No change to the Proposed Variation is recommended.

<p>Submission Number: TCC-C1-VAR1-91</p>	<p>Submission Name: National Transport Authority (NTA)</p>
<p>Submission Summary:</p> <p>Serviced Land Assessment</p> <p>The NTA refers to the S. 28 Guidelines – NPF Implementation: Housing Growth Requirement in respect of the ‘Tiering & Phasing of Lands’ (section 2.4). The NTA notes the inclusion of the SLA tables and the accompanying maps.</p> <p>The NTA consider that further clarification would be merited on how the walking and cycling analysis and the Local Transport Plans / Sustainable Transport Plans has been taken into consideration as part of the assessment process.</p>	

No reference has been made to the availability of public transport or to the potential future public transport improvements under the Connecting Ireland Programme, at settlement level or at the site level.

The NTA view Local Transport Plans as a key aspect in the assessment of the capacity of settlements to expand in a co-ordinated and sustainable manner. They can influence the roll-out of NTA sustainable transport programmes. At settlement level, LTPs provide an appropriate mechanism for the identification of active travel networks within lands zoned for development and include routes that connect adjacent development sites by means of filtered permeability links i.e. connections that serve active modes only. The forward planning stage, prior to commencement of development, is the appropriate stage to prepare such networks. The NTA notes that the development of certain sites in the Proposed Variation is dependant on the development of adjacent sites. The NTA recommends explicit reference to Filtered Permeability connection adjacent sites should be included in the subject Variation as an overarching objective.

Recommendation

It is recommended that the Site Assessments are strengthened with a more robust analysis carried out of the existing and planned provision of active travel infrastructure and public transport services, with the benefit of the analysis undertaken and the measures identified in the local transport plans and sustainable transport plans. It is further recommended that an overarching objective should be included, requiring that all proposed new residential zonings should provide active travel links to adjacent lands by means of Filtered Permeability connections.

Settlement Specific Objectives (Zoning Maps)

Th NTA has the following comments and recommendations in respect of Cashel, Clonmel and Tipperary Town.

Cashel

The NTA has concerns regarding the proposed rezonings to the north-east of Cashel, at sites CS_5, CS_6 and CS_7. They are remote from the town centre and its not clear how they would be served by sustainable transport modes and active travel. The provision of cycle links and a continuous footpath on the R691/Dualla Road would appear to be very challenging.

The NTA recommends that sites CS_5, CS_6 and CS_7 are reviewed to ensure that the proposed rezonings accord with the provisions of the S. 28 Guidelines.

Clonmel – Sites C_3 and C_9 & Tipperary Town Sites TT_1, TT_2 and TT_3

These sites are within the N24 Waterford to Cahir and the N24 Cahir to Limerick Junction schemes and it is not clear that implications from the zoning amendment proposals have been considered and addressed. The Section 28 Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ requires that ‘Development objectives, including the zoning of land, must not compromise the route selection process, particularly in circumstances where road scheme planning is underway and potential route corridors or upgrades have been identified and brought to the attention of the planning authority.’

Recommendation

It is recommended that the above referenced amendments are reviewed to ensure the N24 schemes are safeguarded in accordance with Government policy.

Consideration:

Serviced Land Assessment

The content of the submission is noted. The Serviced Land Assessment will be updated to reflect how measures contained in the Local Transport Plans / Sustainable Transport Plans has been taken into consideration as part of the zoning assessment process.

The NTA recommend that an overarching objective should be included, requiring that all proposed new residential zonings should provide active travel links to adjacent lands by means of Filtered Permeability connections. It is considered that existing Policy 5 -5 of the TCDP addresses this requirement, requiring applications for new residential development to demonstrate “...that all opportunities for connectivity and linkages have been explored and incorporated in accordance with the 10-Minute Town concept and supporting active travel options.”

Settlement Specific Objectives (Zoning Maps)

Cashel

Sites CS_5, CS_6 and CS_7 in Cashel are currently zoned ‘Existing Residential’ and it is proposed to change the zoning of these sites to ‘New Residential’. The purpose of the Variation to increase the amount of residential zoned land to meet projected housing targets.

There is no change to the general intent of the zoning of these sites for residential purposes. The sites are serviced and represent small-scale infill development.

Clonmel – Sites C_3 and C_9 & Tipperary Town Sites TT_1, TT_2 and TT_3

These sites are within the N24 Waterford to Cahir and the N24 Cahir to Limerick Junction schemes. 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).

In respect of specific sites raised in the submission, the following is provided:

C_3 Strategic Reserve to New Residential – It is proposed to amend the zoning of the southern portion of this site to ‘Amenity’ (Site C_3a) to protect the route corridor and urban links of the N24 Project (See Amendment No. 2 and 27 in Part 2). It is considered that the northern section of the site does not directly conflict with planned urban roads and the existing policies contained in the TCDP will ensure the protection of the N24 project. See response to Submission TCC-C1-VAR1-11, TII, which recommends a change to the zoning of the southern part of C_3.

C_9 Community Services and Infrastructure to Strategic Reserve – These lands abut the existing N24 and the existing policies contained in the existing TCDP will ensure the protection of the N24 project. See also commentary on Strategic Reserve zoning below.

TT_1 New Residential Phase 2 to Existing Residential – This zoning change is to reflect that that site has been developed and accommodates the Rosefield housing development.

TT_2 Agriculture to Strategic Reserve – On review, it is considered appropriate to rezone this site to Amenity on foot of the submission from the OPR and OPW in respect of flood risk (See Amendment No. 8 and 31 in Part 2).

TT_3 New Residential Phase 2 to New Residential - On review, it is considered appropriate to rezone this site to Strategic Reserve on foot of the submission from the OPR and OPW in respect of flood risk (See Amendment No. 9 and 31 in Part 2). Based on the standardised zonings being applied to zoning maps as Part of the Proposed Variation, Strategic Reserve is the nearest equivalent to 'New Residential Phase 2', which is the existing zoning of the site.

As set out in the Variation, it is not the intention that SR land would be available for immediate development under the current Development Plan. Rather, activation of these lands will be subject to compliance with certain criteria. Any development proposals on lands zoned Strategic Reserve (SR) would also be subject to other normal planning and environmental considerations including Planning Policy 12-3 of the TCDP.

Recommendation:

Amend the Serviced Land Assessment document to incorporate details of Local Transport Plans / Sustainable Transport Plans (see Amendment 26, 27, 28, 29, 30 in Part 2).

Submission Number:

TCC-C1-VAR1-93

Submission Name:

ARUP on behalf of Tipperary County Council

Submission Summary:

The submission is made in respect of the N24 Cahir to Limerick Junction & Oola Transport Project (the Project). The purpose of the submission is to highlight the strategic importance of the N24 and to request the acknowledgement of same within policies and objectives of the final Variation in respect of the additional zoning of residential lands in Tipperary Town.

The submission outlines the role of the N24 in relation to regional accessibility and the need for the Project is supported in policy at EU, national, regional and local levels. The submission outlines the relevant policy support in the NPF, the NDP and the Tipperary County Development Plan.

ARUP has been appointed to provide multi-disciplinary technical consultancy services for the delivery of Phase 1-4 of the N24 projects. The N24 Cahir to Limerick Junction & Oola Transport Project is currently at Phase 3 Design and Environmental Evaluation. An Options Selection Report was published while Design Update No. 3 was issued in May 2025.

The submission has regard to Tipperary Town and in particular Site TT_2, which is proposed to be rezoned from Agriculture to Strategic Reserve. These lands adjoin with and form part of

the Lake Road which is identified as a Proposed Street and Active Travel Route in Design Update No. 3 for the N24 Cahir to Limerick Junction Project.

The proposed Variation should have regard and fully align itself with national and regional policies and objectives which support the N24 project. It is requested that this support is reflected within the final variation to include a specific policy objective concerned with the N24 Cahir to Limerick Junction & Oola Transport Project and its improvement and the proposed lands TT_2 which are proposed to be zoned Strategic Reserve. Specifically, it is requested that the Variation include a policy objective/commentary stating a commitment to preserve the final preferred route including Lake Road.

Consideration:

The content of this submission is noted. The strategic importance of the N24 and the N24 Cahir to Limerick Junction & Oola Transport Project is 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 refer). 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.*”

It is recommended that Site TT_2 in Tipperary Town is rezoned Amenity on foot of the submission from the OPW and the OPR in respect of flood risk (see Amendment 8 and 31 in Part 2).

Recommendation:

- See Amendment 8 and 31 in Part 2.

Submission Number:

TCC-C1-VAR1-95

Submission Name:

Department of Education and Youth

Submission Summary:

The submission notes the amended Core Strategy contained in the Proposed Variation and the housing requirement to 2031, including headroom. The revised figures could see the demand for school places increase substantially and could place significant pressure on

existing schools to cater for the extra school place requirements across the various settlements in Tipperary.

The Departments preference would be to expand existing facilities (if possible) should there be a requirement for additional school places and requests the Planning Authority to examine the potential of protecting a land buffer around each school to enable them expand further if required.

Clonmel

The projected figures could see a significant increase in primary school place demand which will require a site reservation for school facilities if there is a development of 2,857 housing units by 2031 or beyond. The Department will engage further with the Council.

The projected housing figures will see a significant increase in post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities but also may require the reservation of a site for a future school. This will require further engagement with the Council.

Nenagh

The projected figures could see a substantial increase in primary school place demand which may require a site reservation for school facilities and/or potentially could be met by the possible expansion of the existing facilities. The Department will engage further with the Council.

The projected housing figures could see an increase in post-primary school place demand, but it is currently expected that this extra requirement could be accommodated by the planned expansion of existing facilities.

Thurles

The projected figures could see a substantial increase in primary school place demand which may require a site reservation for school facilities and/or potentially could be met by the possible expansion of the existing facilities. The Department will engage further with the Council.

The projected figures could see an increase in post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

Carrick-on-Suir

The projected figures could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

Roscrea

The projected figures could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

Tipperary Town

The projected figures could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

Cashel

The projected figures could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

Cahir

The projected figures could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

Templemore

The projected figures could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

Other Settlements

The projected figures could see an increase in primary and post-primary school place demand in Ballina, Newport and Fethard, which potentially could be met by the possible expansion of the existing facilities, if required.

In terms of the reservation of sites for schools, schools should be positioned in the heart of communities and other community facilities and amenities should be positioned close to schools. The enabling infrastructure required to develop and operate schools should be provided in advance for the need for schools. Its not within the remit of the Department of Education and Youth to develop or fund this enabling infrastructure.

The Department notes the following changes in Clonmel where existing sites zoned Community Services and Infrastructure sites are proposed to be rezoned. These sites are C_8

and C_9, C_10, C_11 and C_13. C_10 and C_11 are sizeable in nature. It is the Departments preference that all community zonings remain as such where possible.

The Department also anticipates that additional Special Education Needs (SEN) at both Primary and Post Primary level throughout the country. The continuing need for additional provision across the country is kept under constant review. The Department will consult with the Council if and when additional SEN accommodation or sites for future special schools are required within specific locations. The Department would welcome explicit support within the Plan for the provision of school accommodation for SEN.

In terms of assessing current and future capacity, the Department has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis on school place provision. The Department will engage with the Council where the findings of an assessment require a review of existing/future school site provision within a specific location.

The Department welcomes the continued engagement with the Council and requests further engagement in relation to the potential and significant additional school provision that may be required arising from the adoption of the Variation, as proposed.

Consideration:

The issues raised in the submission are noted. In particular, the concerns raised regarding primary school capacity in Clonmel, Nenagh and Thurles and post-primary capacity in Clonmel are noted.

It is noted that the figures quoted by the Department in the submission as ‘projected housing requirement’ in Table 2.4 Core Strategy Table, are more accurately described (as per table 2.4) as *Housing Requirement to 2031 (plus 50% headroom)*. As stated in the NPF Implementation – Housing Growth Requirements, section 28 Guidelines, the scope to apply ‘additional provision’ (headroom) is a response to the urgent need to increase housing delivery. ‘Additional provision’ recognises the fact that, for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan.

The concerns raised in respect of sites in Clonmel proposed to be rezoned from Community Services & Infrastructure are noted. Proposed Variation No 1 is focused on addressing the urgent need for additional residential zoned land. The affected sites are considered suitably

located for the delivery of housing in the short to long term. It should be noted that additional ‘Community Services & Infrastructure’ zoning is proposed adjacent to the hospital (Site C_6).

Tipperary County Council will continue to work collaboratively with the Department in relation to the expansion of school facilities and safeguarding for future expansion and where necessary the identification of sites for future schools.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-96	Submission Name: Electricity Supply Board (ESB)
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Submission Summary:

The submission outlines the role of the ESB and provides an overview of the ESB Strategy. It is ESB’s objective to develop and connect renewable energy generation to decarbonise the electricity system by 2040, consistent with the NPF and the RSES.

ESB Networks is committed to expanding electricity network capacity across Ireland. As part of the ESB Networks Price Review 6 (PR6), covering the period 2026-2030, the organisation proposes substantial infrastructure investments at all voltage levels. ESB Networks will also deploy smart, flexible and digitally enabled solution to optimise asset utilisation and reduce reliance on traditional reinforcements. These efforts are essential to ensuring a reliable and resilient electricity system.

In terms of energy infrastructure and planning policy, the submission makes reference to investment committed to ESB Networks and Eirgrid under the NDP. Its essential that the electricity network is expanded and reinforced to support the delivery of 300,000 new homes by 2030, as per Government policy.

ESB is continuously assessing and reviewing electricity network capacity in Tipperary. ESB acknowledge the collaboration with TCC in the delivery of electricity infrastructure and requests that TCC and ESB intensity their coordinated efforts to identify and secure sites for electricity infrastructure to support housing targets. In addition, ESB encourage early engagement at the design stage of key public infrastructure projects.

ESB presently owns and operate 37 no. high-voltage substations within Co. Tipperary including the Cahir 110kV installation. ESB Networks has identified a programme of reinforcement works across the 38 KV and 110KV networks. Projects in the pipeline include a new 38kV substation at Borrisoleigh, uprates of existing substations at Deerpark, Holycross Road, Ikerrin, Ardfinnan and Cautheen and the uprating of the Ikerrin-Toomevara 38kV overline line.

ESB Networks has undertaken a review of the Medium and Low Voltage network in Co. Tipperary. This review has identified areas where additional MV/LV substations and upgrades to existing substations are required. The submission requests that the Tipperary County Development Plan incorporates robust policy objectives supporting the reinforcement of the medium and low voltage network and that TCC support the recommended energy infrastructure developments set out in the submission. The ESB requests TCC and ESB co-ordinate to identify suitable sites for infrastructure for the MV/LV network. The ESB also request that public utilities is permissible under all zoning objectives.

In respect of the revised housing targets set out in Proposed Variation No. 1, ESB request that due consideration is particularly given to:

- Safeguarding the ESB's existing transmission and distribution assets.
- Collaboration between TCC and ESB to identify, zone and secure suitable sites for new electricity infrastructure.
- Critical network upgrades and capacity enhancements across transmission, medium voltage, and low-voltage systems are essential.
- Ensuring public utilities is permissible under all zoning objectives
- Early engagement with ESB in the planning and design of key public infrastructure projects in terms of ducting and cabling.
- Continued investment in electricity infrastructure in Co. Tipperary is a prerequisite for achieving national objectives in terms of housing and climate targets.

Consideration:

The submission is noted. The importance of supporting the upgrading/expansion of electricity infrastructure is acknowledged. The programme of works across the 38kV and 110kV network including projects at Borrisoleigh, Deerpark, Holycross Road, Ikerrin, Ardfinnan and Cautheen is noted. Tipperary County Council will continue to work collaboratively with ESB in the delivery and safeguarding of electricity infrastructure in County Tipperary.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-99

Submission Name:

Construction Industry Federation (CIF)

Submission Summary:

The submission is made on behalf of the CIF Southern Region and its members in Co. Tipperary. The CIF strongly supports the Council’s proactive approach in bringing forward this Variation. CIF members are committed to working with TCC to ensure these revised housing targets are delivered on the ground. The CIF welcomes the updated Core Strategy; consolidation of all zoning maps into the County Development Plan; introduction of a consistent zoning matrix and standardised objectives; structured approach to Strategic Reserve activation; and alignment with NPF’s compact growth and sequential development principles.

Strategic Reserve Policy

CIF strongly supports the new policy on Strategic Reserve. CIF requests the Council should explicitly confirm that “committed” includes sites with extant planning permission, sites with SHD/LRD approval, sites under active pre-planning with Uisce Eireann confirmation of feasibility. The Council should allow SR activation without requiring full 50% R1 uptake, provided robust evidence is submitted.

Zoning Maps

The CIF supports the consolidation of all zoning maps into the County Development Plan. However, where zoning changes alter development expectations, the Council should provide transition arrangements for live planning applications and active land management strategies.

The Council should publish a digital zoning viewer to support industry use and reduce interpretation errors.

Town Environs Policy

Concerns are raised in relation to overly restrictive criteria. The Council should consider allowing limited single dwellings on TE lands where the proposed does not prejudice future town expansion; the site is serviced / serviceable; the dwelling is modest.

Serviced Land Assessment (SLA)

CIF welcomes the updated SLA. The Council should commit to annual SLA updates.

Compact Growth and Density

The Council should adopt a flexible, context-led approach to density, particularly in District Towns, Local Towns and Service Centres.

Enterprise and Employment Zoning

The CIF welcomes the retention and expansion of employment zoning, particularly in Clonmel, Cahir, Roscrea and Carrick-on-Suir, to ensure housing growth is matched by job creation. The Council should prioritise infrastructure and access improvements to employment lands.

Consideration:

The support for the Proposed Variation No 1 is noted and welcomed.

Tipperary County Council has a digital GIS tool, The Public Planning Map Viewer, which is updated when any changes to zoning are made. Transitional arrangements for zoning are not appropriate. Any zoning changes will not impact valid planning permissions.

The comments on activation of SR lands are noted. Policy 5-18 will facilitate activation of land zoned Strategic Reserve in a coherent manner consistent with proper planning and sustainable development. What is deemed “committed land” is clearly set out in the proposed policy.

The comments on Town Environs Policy are noted. As set out in 5.5.1, Town Environs are considered to be under urban pressure and although not required for settlement growth at present, they have an important role in the longer-term growth of settlements and must be protected accordingly.

Comments on density and employing zoning are noted.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-100

Submission Name:

An Taisce

Submission Summary:

While it is acknowledged that there is a housing crisis, zoning for residential development purposes should not compromise the needs of biodiversity conservation and restoration, the achievement of compact settlement objectives, or the need to avoid zoning in flood risk areas.

Biodiversity Policy and Legal Context

- The submission highlights the requirement of Article 10 of the Habitats Directive.
- The proposed rezonings should not exacerbate further fragmentation of biodiversity habitat.
- The proposed rezonings require assessment in light of the goal of the landmark Kunming-Montreal Global Biodiversity Framework to halt and reverse biodiversity loss by 2030, which filters through the EU Biodiversity Strategy, National Biodiversity Action Plan and county / local plans.
- Sites of ecological significance which could contribute to Nature Restoration Law implementation should be taken into consideration.
- Forward planning should seek to avoid future development pressures on these sensitive sites and provides measures to achieve this.
- Proposed activation of strategic residential reserve sites should the Habitats Directive, Water Framework Directive, Birds Directive, Floods Directive, etc.
- Sets out requirements under the Wildlife (Amendment) Act 2023, the NPF and the Planning & Development Act 2024 in respect of biodiversity and ecological conservation.
- Land use changes need to be considered against the biodiversity objectives contained in the County Development Plan.

Community & Social Infrastructure

- In activating additional land for residential purposes, consideration should be given to the need for social and community infrastructure zoning provision. A Social and Community Infrastructure Assessment should be carried out.
- The Council should use the concept of the '15 minute city' to ensure compact settlement within walking and cycling range of local services, amenities and public transport.
- The Proposed Variation should drive the provision of better designed and higher density urban areas with active travel and public transport connectivity. An Taisce would seek full alignment of the Development Plan with the Compact Settlement Guidelines (2024).
- An Taisce recommends that the Development Plan variation be amended to incorporate and enhance the seven location test standards for new housing in urban areas as outlined in the National Spatial Strategy (2002).

Flood Risk

- A Strategic Flood Risk Assessment (SFRA) should be undertaken as part of Variation.
- Proposed zonings should also take account of future climate change flooding scenarios and historic flood mapping.
- Sustainable Urban Drainage Solutions and nature-based management of rainwater should be factored into the Variation.
- Adherence to Article 7 of the Floods Directive should be demonstrated.

Heritage

- Additional residential zoning should consider National Monuments, archaeology and Protected Structures to avoid impacts in advance of planning application stage.

SEA Monitoring

- Reference requirements under SEA Directive. Compliance of the SEA Environmental Report with the requirements of the SEA Directive needs to be assessed and validated.
- An Taisce considers that the proper interpretation of Article 10 of the SEA Directive requires that the SEA monitoring process be based on quantitative, audited data and that qualitative data be provided on an ongoing basis during the lifetime of the plan or programme. Remedial actions be taken where unforeseen negative impacts are identified.

Consideration:

The submission is noted. The potential environmental impacts associated with the development of lands proposed to be zoned in Variation No. 1 have been assessed through the SEA process, in accordance with legislation and guidelines by qualified and experienced environmental practitioners and subject to the inputs of prescribed environmental authorities. The environmental assessment undertaken was carried out in accordance with an Integrated Biodiversity Impact Assessment based methodology in accordance with the EPA's guidance document 'Final Report: Integrated Biodiversity Impact Assessment, Streamlining AA, SEA and EIA Processes. Best Practice Guidance' (2012).

As part of the Variation, an AA Screening and Natura Impact Report were carried out which considered potential impacts to Natura 2000 sites in view of the conservation objectives of the habitats and species for which the sites have been designated.

A Strategic Flood Risk Assessment was prepared to inform policy and land use decisions in areas that have been assessed as being at risk of flooding. The SFRA has considered climate change and its potential impacts, for both Mid-Range Future Scenario (MRFS) and High-End Future Scenario (HEFS).

The preparation of the Variation took place concurrently with the SEA, AA and the SFRA for the Variation and the findings of the SEA, AA and SFRA informed the Variation.

Any alterations to the Proposed Variation will be examined to ensure that they will not generate additional, likely significant effects on the receiving environment or European Sites.

Furthermore, the Proposed Variation is subject to a range of protective policy and objectives within the TCDP. Compact settlement guidelines and protection of greenfield lands are encouraged through the Town Centre First policy approach (7-A, 3-3, 4-1, 5-5, 7-1), biodiversity protection is implemented through (11-C, 11-D, 11-1, 11-8, 11-13), SuDS and climate change scenarios are incorporated (15-C), heritage assets are afforded protection (13-1, 13-3, 13-4, 13-6, 13-7), and the provision of community and social infrastructure remains a priority (15-E). A more comprehensive list relating to protective policy and objectives for all environmental components can be referred to in Section 8.2 of the SEA ER.

An additional policy (Reference 11-20) has been defined and integrated into the Proposed Variation which affords protection to all environmental components by ensuring that the

expansion of settlements in County Tipperary is in line with the principles of proper planning and sustainable development, pre-existing environmental protection objectives, and not creating significant adverse cumulative effects on the environment.

With regards to a monitoring programme, a robust framework already exists in the current TCDP. This framework will be applicable for the Proposed Variation, and additional bespoke SEOs/monitoring measures have been defined for population and human health, biodiversity flora and fauna, climate, and air quality (and noise) (See Section 9 of the SEA ER).

Recommendation:

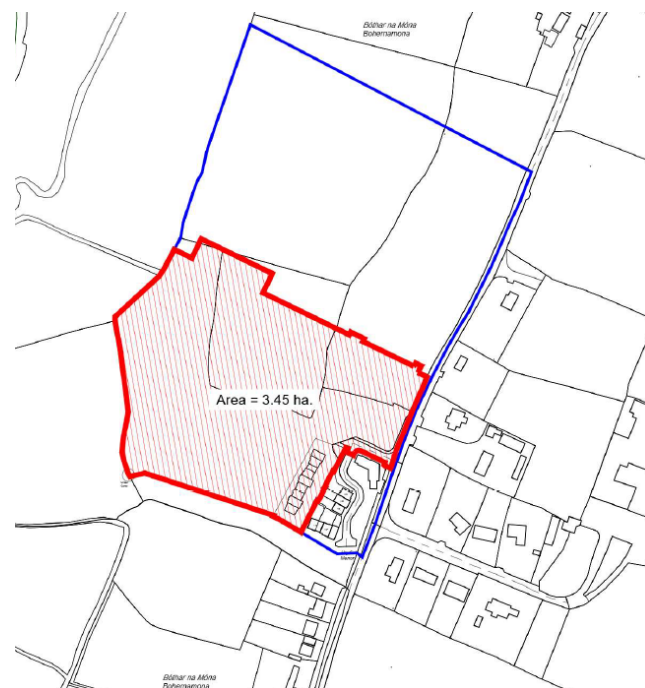
No change to the Proposed Variation is recommended.

2.2 Individual Submissions – Thurles MD

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-1	Sinead Maher	Thurles
<p>Submission Summary:</p> <p>The submission seeks the re-zoning of 3.45 ha of land at Hayfield / Bohernamona, Thurles from Strategic Reserve to Residential. The adopted Thurles and Environs Local Area Plan 2024-2030 changed the previous zoning of these lands from Residential to Strategic Reserve and the submission seeks to restore the residential zoning of the site, as per the Thurles and Environs Development Plan 2009-2015 (as extended).</p> <p>The subject lands form part of a previously permitted and partially constructed residential development. While development commenced, it was not completed, resulting in a legacy unfinished residential site within the urban boundary of Thurles. The subject site is clearly suitable for new residential development in line with the National Planning Framework (NPF) and the Regional Spatial & Economic Strategy 2020-2032 (RSES) being a ghost estate on brownfield lands.</p> <p>At present, wastewater arising from the existing development and adjoining uses—including a RehabCare day service facility is being managed via a private wastewater treatment system located on lands within the respondents ownership. 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. As part of the previous planning application (Ref. P.23/60748), Uisce Éireann confirmed in principle that connection to the public network could be facilitated, subject to detailed design and standard approval processes.</p> <p>Surface water will be managed via a modern SUDS-compliant drainage system. The respondent retains ownership and control of the intervening lands between the subject site and the River Suir, ensuring a route for surface water outfall.</p> <p>Proposed development of the site would include a crèche and a wide variety of unit types to cater for the variety of people and households, including the potential provision of up to 8 units to meet the needs identified by RehabCare.</p> <p>The lands are also located along a corridor identified for a future river walk / greenway connection, allowing for future integration with planned green infrastructure.</p>		

The recent planning refusal (Ref. P.23/60748) related to zoning status and drainage and servicing detail. Rezoning resolves the primary policy constraint and a clear and deliverable servicing strategy exists, supported by Uisce Éireann in-principle confirmation and full land control to the River Suir.

Hayfield Manor is the last remaining ghost estate in Thurles and this is the last opportunity, for the foreseeable future at least, to resolve outstanding infrastructural issues including removal of private temporary wastewater treatment plant (WWTP) and replacement with new pumping station and connection to public sewer; provision of an improved storm water drainage system; and upgrading and completion of footpaths, lighting, landscaping, to be taken in charge by TCC.



Consideration:

The site is located on the Bohernamona Road approx. 1.6km from Liberty Square and over 20 minutes walking distance. The Uisce Éireann pre-connection enquiry report associated with a historic planning application (23/60748) for a residential development on the site indicates that while a wastewater connection is feasible, subject to upgrades, a rising main of c. 1.5km would need to be delivered to connect to the network at the Mill Road. While the planning authority recognise the long-term development potential of the subject lands, it is considered that there are more appropriate sites closer to the town centre that better align with the principles of compact growth and sequential development that can accommodate projected growth within the lifetime of the development plan.

Recommendation:

No change recommended

Submission Number:

TCC-C1-VAR1-10

Submission Name:

Two Mile Borris Community
 Development and Tidy Towns Ltd

Settlement:

Two Mile Borris

Submission Summary:

We are very keen to maintain if not extend the current zoned area for amenity space close to the river near the village. The village has grown a lot in recent years but has no public open space. This is the only chance for the village have an open space in the future. We would hope that any future development on the adjacent site would be conditioned to support the development of such an open space/amenity.

Consideration:

The submission is noted. The land adjacent to the river is already zoned Amenity under the existing County Development Plan, with no changes proposed under this Variation. The development of any residential zoned land would be subject to a planning application, which would include the provision and assessment of public open space. The respondent would have an opportunity to make a submission / observation on any such planning application.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-55

Submission Name:

Richard Foley Planning
 Consultancy Ltd. On behalf of
 Coolross Homes Ltd.

Settlement:

Thurles

Submission Summary:

Submission made on behalf of Coolross Homes Ltd. seeking the rezoning of approximately 1.64ha of land zoned Town Environs to Residential. Coolross Homes Ltd. are currently developing 125 residential units at a site with access from Mitchell Street and Bohernamona Road in Thurles. The proposed site adjoins the development site, Riverwood, to the north.

Thurles is a Key Town and Riverwood is one of the only largescale residential developments undertaken here in recent years. The current TE zoning would allow for limited development

while the site if rezoned has the potential to facilitate 57 units based on the lower end of the residential development guidelines.

It is noted that there is capacity within the Riverwood development for c. 60 units in terms of water supply and foul/surface water drainage which has been confirmed by Uisce Éireann. The rezoning of this land would allow for the natural progression of Riverwood with a phase 3 planning application and would contribute to housing objectives within the lifetime of the Development Plan.

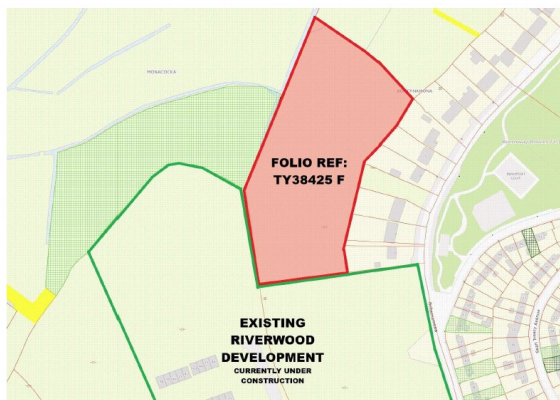


Image 2 – Land Registry Mapping c/w Proposed Site for Rezoning Consideration outlined in red

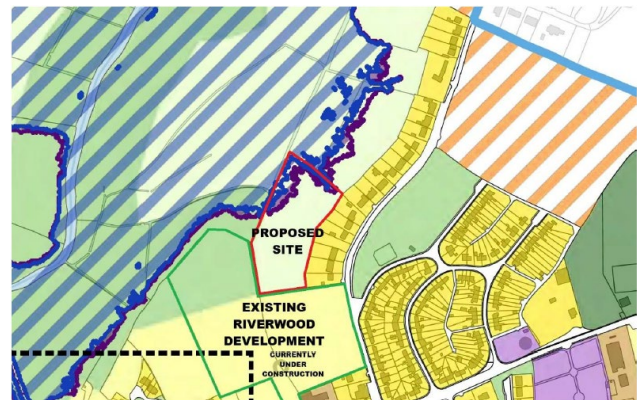


Image 1 – Proposed Site for Rezoning Consideration outlined in red

Consideration:

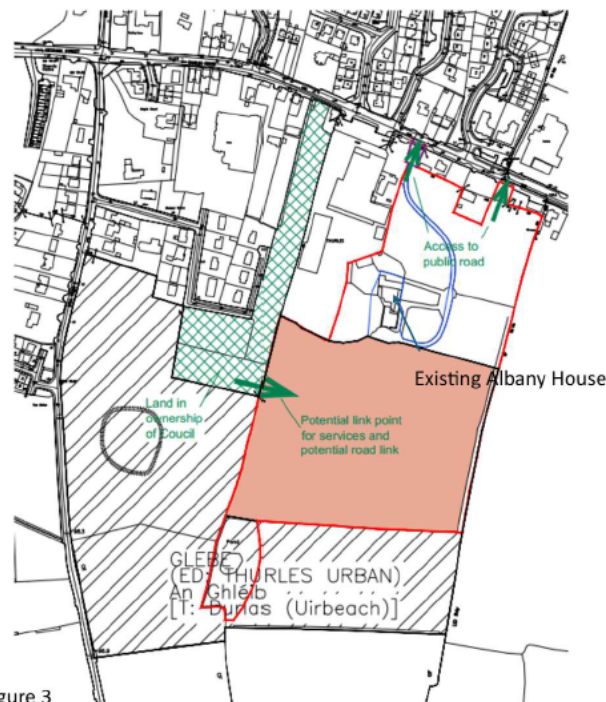
The site is adjoining an ongoing development site to the north east. The site is considered to be adequately serviceable in terms of water and wastewater. The site aligns with the principles of compact growth and sequential development and is located within close proximity to the town centre. The developer has a proven track record of delivering housing and has expressed an intention to develop the site if the zoning is changed.

The north and northwest boundary to the proposed site is located within a flood zone and is therefore inappropriate for residential development and will not be included in the recommended change,

Recommendation:

- Adjust boundary of the proposed site outside the flood extent and rezone remaining site to New Residential. (see Amendment 7 and 28 in Part 2)

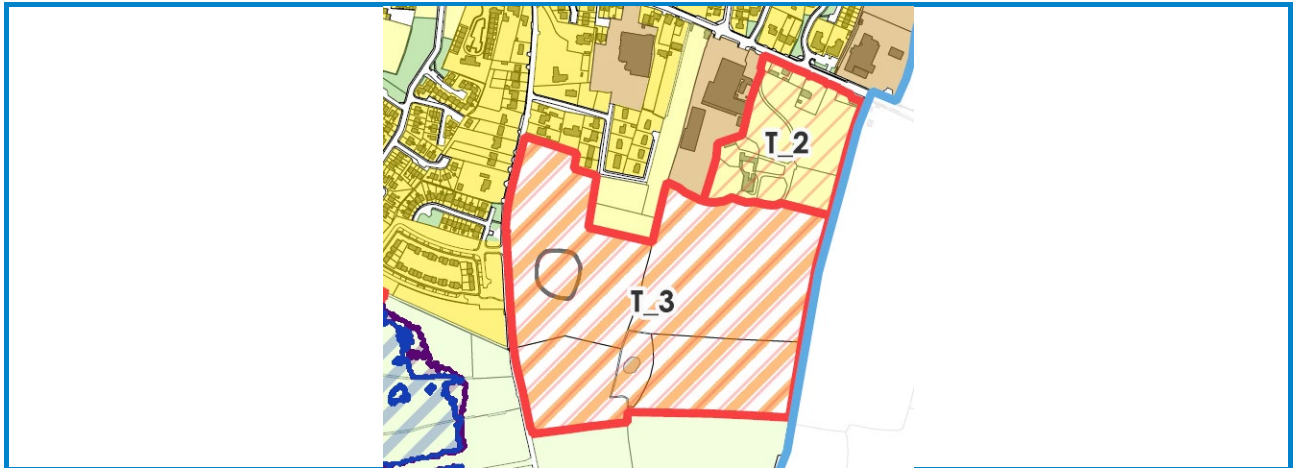
<p>Submission Number: TCC-C1-VAR1-57</p>	<p>Submission Name: David Commins</p>	<p>Settlement: Thurles</p>
<p>Submission Summary:</p> <p>A request to change the proposed zoning of land in the townland of Glebe, Dublin Road, Thurles, from Strategic Reserve to New Residential. The Variation proposes to zone part of the land (north) to New Residential and part to Strategic Reserve; it is felt that this will impede residential development potential on the c. 8.9 ha site.</p> <p>The land is adjacent to land previously owned by the respondent on which a successful planning application was granted. The adjoining site was sold to TCC who advised that provisions may be provided for the site to be serviced with appropriate water, wastewater and surface water infrastructure. The main access to the site is via the Dublin Road but also potentially through the adjoining development site on agreement with TCC.</p> <p>Currently the land is in two parts, the front (northern) section is proposed New Residential which is welcomed. The back (southern) section is proposed Strategic Reserve. It is the landowner’s intention to develop the entire site, part of which is proposed Strategic Reserve. It is requested that the Council consider zoning approx. 1/3 of the proposed SR as NR which better reflects the scale and phasing of the future development proposal.</p> <p>The requested zoning will aid in the delivery of the NPF Implementation Guidelines and will enable the respondent to prepare a comprehensive site plan including infrastructure to facilitate this development and future development on surrounding lands.</p> <p>The site is within the town boundary and is proximate to the town centre and amenities. The existing Georgian house on the site presents an opportunity for adaptive reuse, aligning heritage preservation and community needs. It could be refurbished as a residential care facility or such.</p> <p>There are no planning restriction that would negatively impact the site in accordance with the development plan.</p>		



It is requested that the land above filled in solid colour is zoned for residential purposes. If it is re-zoned as outlined it is the respondents intention to develop a purpose-built retirement type village within a managed community focussed setting. The concept would include elements of a gated community, would respond to evolving demographic needs and would provide high quality living for older residents in a well-integrated location.

Consideration:

The proposal is to partially rezone site ref. T_3 from Strategic Reserve to New Residential. The additionally zoned land would allow for a more significant residential development for the land owner of T_2 who also owns land within T_3. The site is accessed from the Dublin Road to the north or potentially through the adjoining development site to the west. The site is proximate to amenities and the town centre. The zoning of additional land within T_3 would allow for a more comprehensive development and would unlock access to infrastructure and services through its boundary with an existing New Residentially zoned landholding.



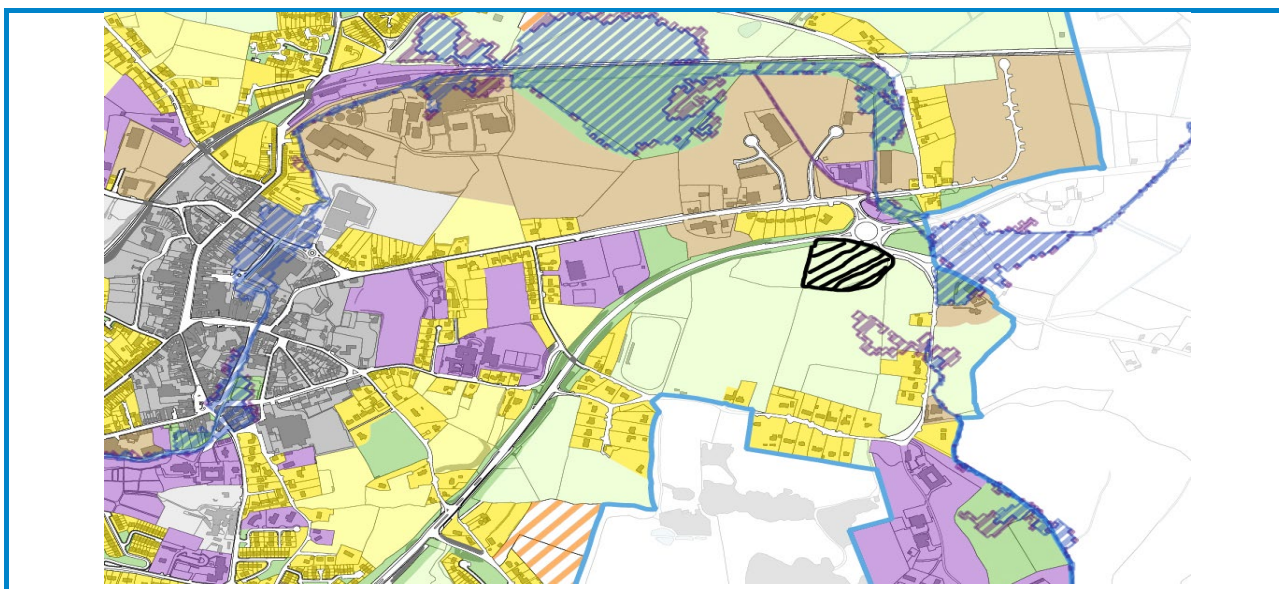
Recommendation:

- Partially re-zone site T_3 to New Residential. (see Amendment 6 and 28 in Part 2)

Submission Number: TCC-C1-VAR1-63	Submission Name: Patrick Delaney	Settlement: Roscrea
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Submission Summary:

This submission supports the rezoning of lands close to the town centre of Roscrea from “Town and Environs” to “Residential”, citing a lack of recent private housing development and increasing pressure on housing affordability, particularly for first-time buyers. It is proposed that the lands are well located adjacent to the town centre, schools, services and employment, and benefit from existing infrastructure capacity. The submission further states that the proposed rezoning would support compact and sustainable urban growth and contribute positively to the economic vitality and regeneration of Roscrea.



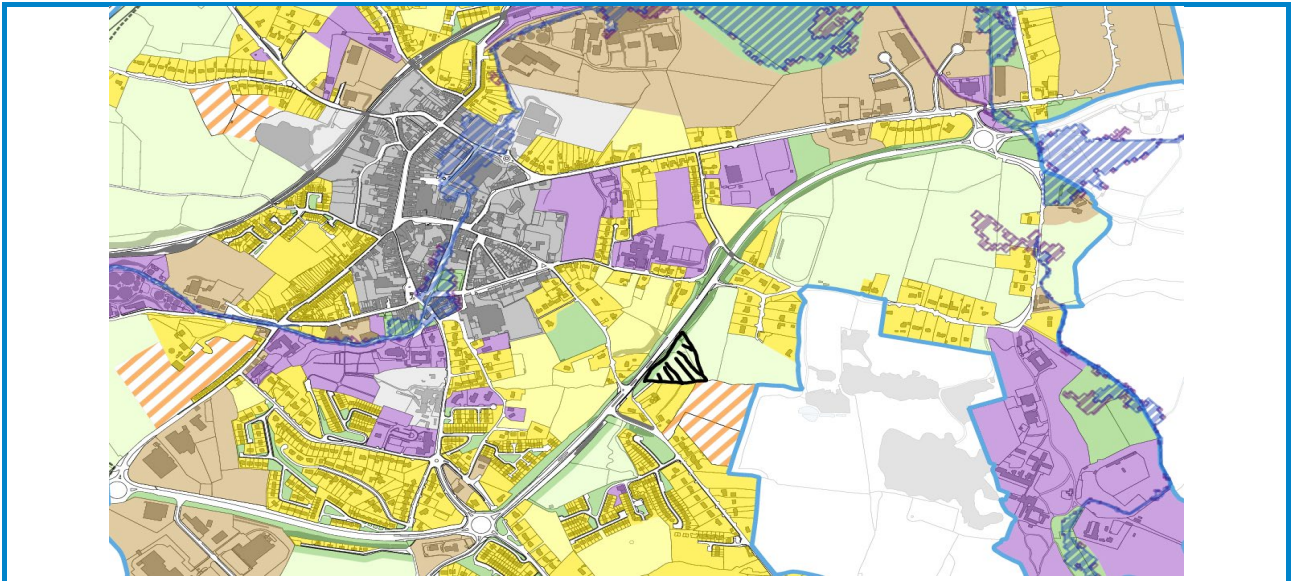
Consideration:

The content of the submission is noted. The site is located on the periphery of the town in an area zoned ‘Town Environs’. The site is not considered to be sequential in nature nor does it align with the principle of compact growth. It is considered that there are more suitable sites within the settlement boundary to cater for future growth within the Plan period.

Recommendation:

No change recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-64	Sarah Fitzgerald	Roscrea
<p>Submission Summary:</p> <p>This submission proposes that the lands outlined are suited for residential development due to their strategic location within walking distance of Roscrea town centre, with good access to services thus supporting compact and sustainable growth. It contends that residential development in Roscrea has been overly concentrated along the Knock Road, resulting in an imbalanced development pattern, while other centrally located and suitably serviced lands have remained underutilised. The submission further notes that the lands were omitted from the Roscrea Local Area Plan despite being centrally located, serviced and suitable for housing. Finally, it states that rezoning land currently designated as “Town Environs” would allow the efficient use of underutilised land to meet pressing local housing needs.</p>		



Consideration:

The content of the submission is noted. The site is occupied by a one-off house and there is a current planning application seeking another single dwelling on the site (Planning Ref: 2560671). The public sewer is not available to the site and it is proposed to connect to an on-site wastewater treatment system. The area is characterised by a collection of low-density one-off housing. The scope of the variation is to zone land for largescale residential development in order to facilitate future growth at scale. It is not the intention of the Proposed Variation to zone land for one-off housing.

Recommendation:

No change recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-90	Bluett & O'Donoghue on behalf of Mr. Fintan Murphy	Littleton

Submission Summary:

This submission sets out that Littleton’s population has increased to 414 (Census 2022), but the settlement hierarchy and zoning remain based on outdated 2016 data. Despite meeting the criteria applied to other settlements with similar or smaller populations, Littleton has no residential zoning and is limited to amenity or social zoning.



The submission contends that Littleton should now be classified as a Service Centre and provided with residential zoning to allow sustainable growth. The subject site outlined in red (c.2.9 ha), is located within the village centre boundary. The respondent believes that the site is considered suitable for housing development, with capacity for approximately 66 dwellings while providing over 20% public open space. Existing amenity zoning is deemed unnecessary given that the village already exceeds open space requirements. The site is fully serviceable, with confirmation from Uisce Éireann that water and wastewater connections are feasible.

Consideration:

While the submission is noted, the settlement of Littleton is not within the scope of Proposed Variation No. 1, as it does not contain residential zoning. A review of the County Settlement Hierarchy is also not within the scope of Proposed Variation No. 1. The respondent will have an opportunity to engage with the Planning Authority as part of the review of the Tipperary County Development Plan.

Recommendation:

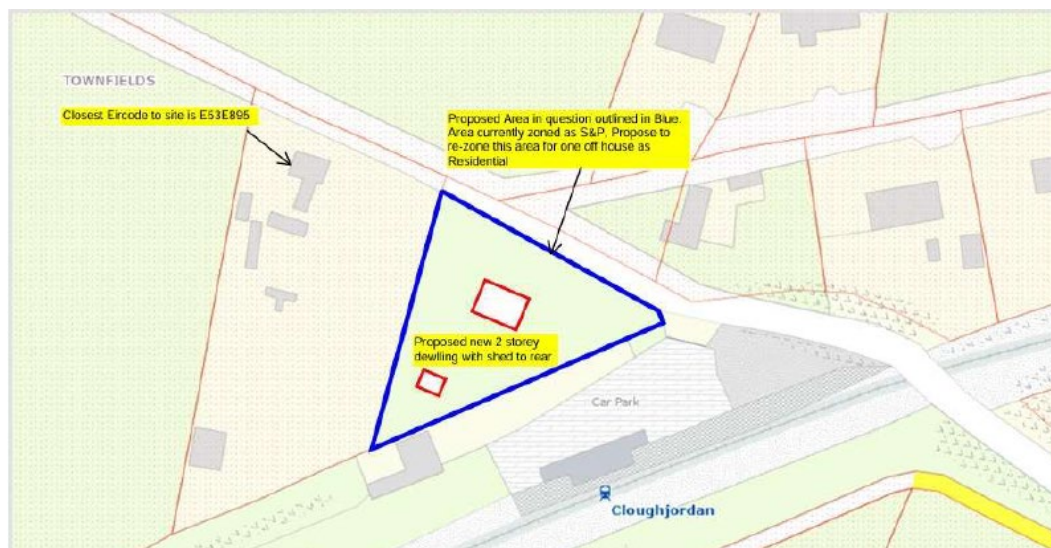
No change to the Proposed Variation is recommended.

2.3 Individual Submissions – Nenagh MD

Submission Number: TCC-C1-VAR1-2 & TCC-C1-VAR1-80	Submission Name: Cormac Williams	Settlement: Cloughjordan
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Submission Summary:

The submission is seeking the rezoning of a site in Cloughjordan adjacent to the train station from ‘Social & Public’ to ‘Residential’ for a one-off family home for the respondent’s family (see map below). The site is located within the town settlement boundary and is the only available site in the area. The current ‘Social & Public’ zoning is unlikely to yield any development of that type. The respondent grew up in the area and his home house is 100 metres from the site. Pre-planning consultation was undertaken with TCC Planning Department in October 2025, in which it was advised that a residential use is not permitted in principle on lands zoned ‘Social and Public’.



Consideration:

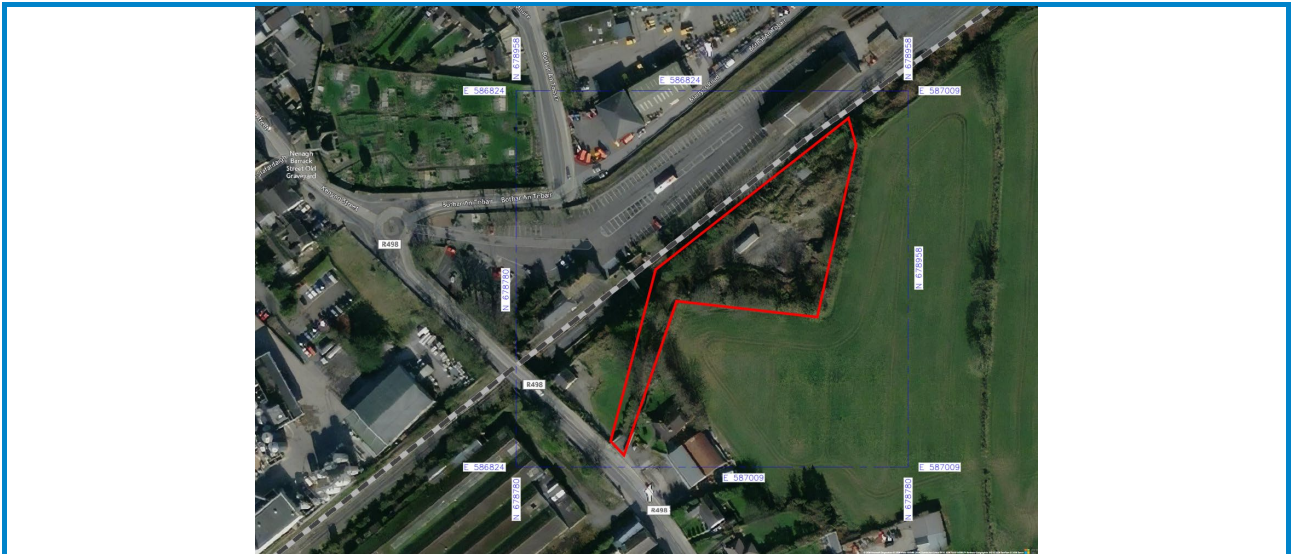
The existing Social and Public zoning of the site is to support and complement the adjoining train station. The submission advises the re-zoning is sought to facilitate a family home on the site. In terms of servicing, the public water mains run along the road (R490) adjacent to the site. The public sewer is not available to the site. There is a footpath on the opposite site of the road (R490), connecting to the village of Cloughjordan. The site is not considered to meet the criteria for sequential development or compact growth, noting that it is located c. 1km from the village centre, with vacant land zoned ‘Agriculture’ separating the site from the village. The zoning of the site for residential development would leapfrog this other land.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-4	Submission Name: Tony McCormack	Settlement: Ballina
Submission Summary: The site is located on Grange Road, Ballina and is identified as B7 on the Ballina Zoning Map. The landowner welcomes the re-zoning of the site for housing. The site is fully serviced and is shovel ready for completion of the project.		
Consideration: Proposed Variation No. 1 proposes a change of zoning of the site from ‘Amenity’ to ‘Existing Residential’ to reflect that there is an existing dwelling on the site and infrastructure in place for infill development.		
Recommendation: No change to the Proposed Variation is recommended.		

Submission Number: TCC-C1-VAR1-5	Submission Name: Hutch O’Malley	Settlement: Nenagh
Submission Summary: The submission is seeking the rezoning of a site in Nenagh adjacent to the train station from ‘Amenity’ to ‘Commercial Uses’. The site is not greenfield land, it is a triangular yard with hardstanding/gravel in situ. The site is accessed from the Tyone Road and located within the town settlement boundary and is adjacent to the rail line and land zoned for New Residential. The site is optimally located, suitable for employment uses and can be ready for use as commercial storage area.		



Consideration:

The site referred to in the submission is primarily zoned ‘Amenity’, and the entrance/ access road is within the ‘Urban Core’ zoning. The north-western part of the land that forms the boundary with the railway line is within Flood Zone A and Flood Zone B. The purpose of Proposed Variation No. 1 is to ensure that there is sufficient residential zoned land in the County to facilitate the achievement of housing growth requirements over the period of the Tipperary County Development Plan 2022-2028 and beyond. The proposed request to rezone the subject land for commercial uses is beyond the scope of Variation No. 1. 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 to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-8	Submission Name: Lough Derg Marina Limited	Settlement: Ballina
Submission Summary: This submission is made with specific reference to 0.17 hectares of land located at Lough Derg Marina in the settlement of Ballina where a change in zoning is required from Employment to Residential.		



The subject site contains an existing vacant building, previously used for commercial purposes associated with the marina. The land represents Phase 2 of the overall Masterplan for the marina and it is proposed to replace the existing building with an apartment building, adjoining existing residential development.

Whilst it is acknowledged that some of the land (southern extent) is located in Flood Zone A, consideration of these lands must be different to other lands that are also subject to flooding:

- The site is already developed and the existing building footprint would be maintained.
- A flood sensitive strategy can be adapted with alternative use at ground floor level, with residential use above flood level.
- A safe means of escape can be provided from the site in the event of a flood.
- Flood resistant construction measures shall be adopted.

Apartments could be provided in a sensitively designed building thereby visually improving a significant waterside entry point into the settlement. There is adequate capacity as per the Core Strategy to include the subject lands as part of the residential supply in Ballina.

Consideration:

The site in question is affected by Flood Zone A and Flood Zone B. The existing building is within Flood Zone B. The northern portion of the site is not within a flood zone (see extract from Ballina zoning map below).



The Flood Risk Management Guidelines (2009) recommend a sequential approach to planning. In general, most types of development would be considered inappropriate in Flood Zone A. In Flood Zone B highly vulnerable development (e.g., hospitals, dwelling houses and primary infrastructure) would be considered inappropriate but less vulnerable development (e.g., retail, commercial and industrial uses) might be considered appropriate. Given that a significant portion of the site (including the existing building) is affected by Flood Zone A / B, it is not considered appropriate to re-zone the site for residential purposes, which is considered a vulnerable use. The existing zoning of the site for employment purposes, facilitates non-vulnerable uses which are more appropriate in Flood Zone B.

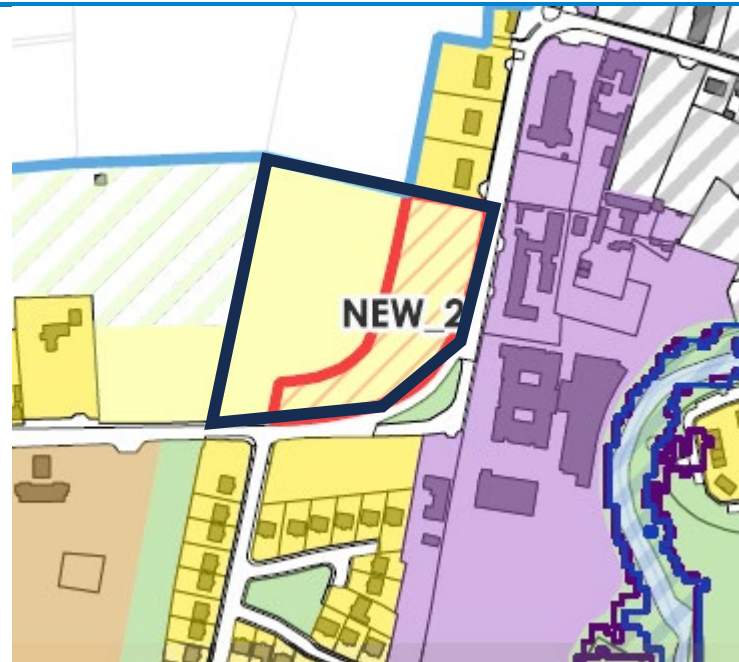
Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-12	Submission Name: Pat Keating	Settlement: Newport
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Submission Summary:

Request that the site identified below (outlined in black) be rezoned from residential use to agricultural use.



The lands form an integral part of a farming enterprise and the continued agricultural use of these lands is fundamental to the sustainable operation of the farm. The residential zoning applied to the lands does not reflect their established use, character or function.

The proposed residential zoning would restrict and effectively prevent the continued access to the adjoining agricultural lands that form part of the overall holding and are located outside the town plan boundary. This would significantly undermine the viable and sustainable operation of the farm.

The residential growth objectives for Newport can be met through more suitable accessible lands, without the need to retain residential zoning on lands that are actively farmed as part of a larger farm holding.

Consideration:

While the content of the submission is noted, the site satisfies the criteria for being zoned for residential development having regard to the S. 28 Development Plan Guidelines (2022) in respect of compact growth, sequential development and servicing. The site has been given a 'Tier 1' rating in the accompanying Serviced Land Assessment. The site is fully serviced and centrally located within the town centre. The site is in walking distance to schools, services and amenities. An agricultural access to the remainder of the farm could be accommodated as part of any development proposal.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-14	Submission Name: TCC – Nenagh MD	Settlement: Nenagh
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Submission Summary:

The former water tower in Nenagh located at Nenagh North adjacent to the Hawthorns Estate is zoned as Community Services and Infrastructure. The water tower is in the ownership of TCC and is no longer required for water services infrastructure. Its currently used for ad hoc storage by MD staff. The water tower is in a predominantly residential area and the site has potential for residential housing development. Request to amend the zoning of the site for residential purposes.



Consideration:

The current zoning of the site reflects its former use as a water tower. The site is a small infill brownfield site in an established residential area in Nenagh that benefits from existing services. It is considered appropriate to re-zone the site for residential purposes to provide for an infill residential development.

Recommendation:

- It is recommended that the zoning of the site and immediately adjacent land be changed to 'New Residential' (see Amendment 4 and 26 in Part 2)

Submission Number: TCC-C1-VAR1-20	Submission Name: McGill Planning on behalf of Christopher Lind	Settlement: Nenagh
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Submission Summary:

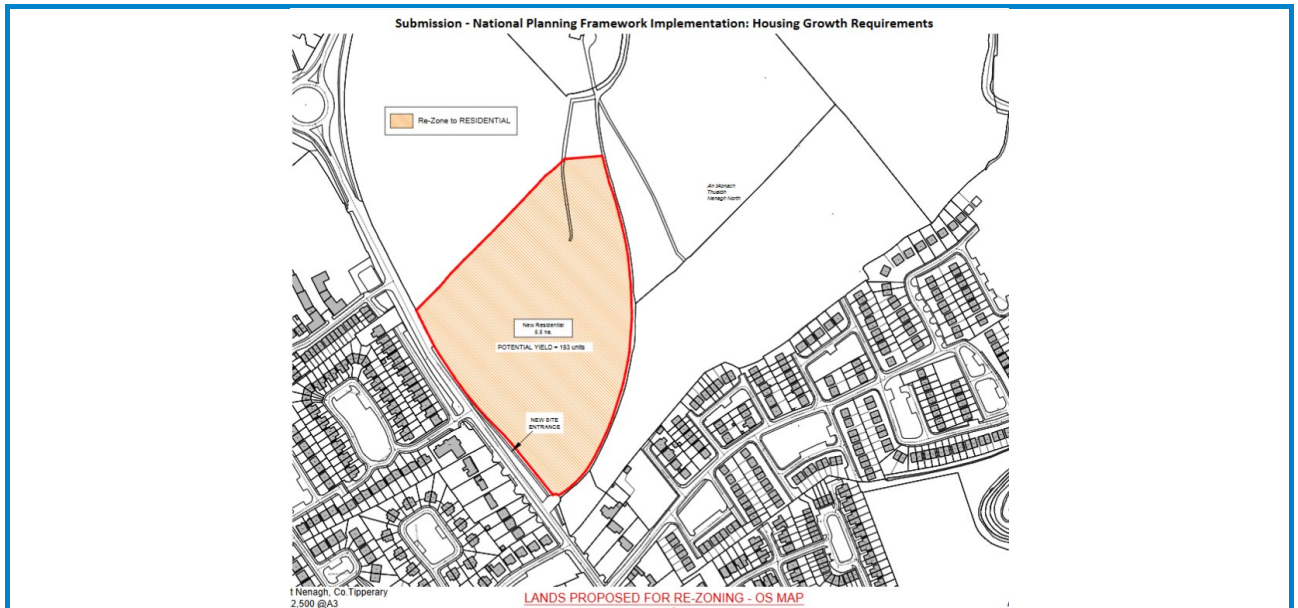
The submission seeks the rezoning of c. 5.5 hectares of land south-east of the N52–R497 junction in Nenagh from “Town Environs” to residential use.

The lands are immediately adjacent to established residential development and represent a logical and sequential extension of Nenagh’s built-up area. The site is within walking distance of the town centre, schools, retail, healthcare, employment areas, rail station, and community facilities. It lies within the Drommin Road / Borrisokane Road Residential Neighbourhood, an area identified in the Nenagh LAP as suitable for future residential growth due to existing infrastructure and accessibility.

Rezoning supports compact and sustainable growth in line with national, regional, and local planning policy, including the NPF First Revision and the Nenagh & Environs LAP 2024–2030. The location is considered preferable to more peripheral or isolated sites for accommodating growth.

Nenagh’s housing requirement is projected to increase significantly (from 664 units to 996 in the updated Core Strategy). The site could deliver approximately 193 housing units at a density of c. 35 units per hectare, providing a mix of housing types including family homes, smaller units, and age-friendly housing. The submission highlights that many lands zoned for residential use since the 2013 LAP remain undeveloped, and argues this site is viable and capable of delivery in the short term.

The site fronts onto the R497, a designated urban transport corridor with planned active travel improvements. It is located within the highest employment destination zone for Nenagh residents and close to major employers, schools, hospital, retail, and the train station. The submission notes opportunities to enhance walking and cycling connectivity, in line with LAP transport objectives.



Consideration:

The subject land is situated approx. 1.3km from Nenagh Town centre, accessed from the Borrisokane Road and connected fully to the town by footpaths. The site is located within the curtilage of Brook Watson house and straddles its entrance to the north. There is an established residential neighbourhood to the west of the subject site and further residential estates located to its south. The site is considered to be serviceable and is located proximate to neighbourhood amenities such as a large supermarket, pharmacy, butchers etc. The subject land aligns with the principles of sustainable development and is sequential in nature.

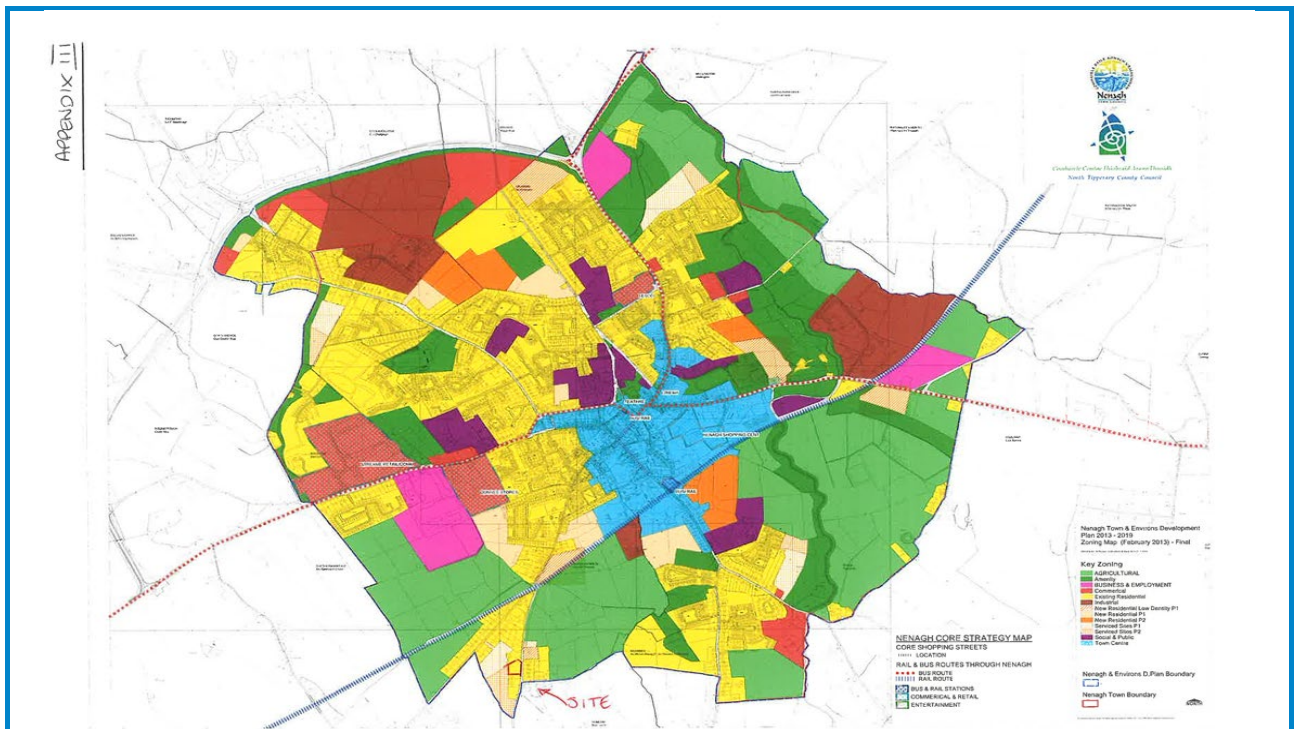
Recommendation:

- Amend zoning to New Residential. (see Amendment 5 and 26 in Part 2)

Submission Number: TCC-C1-VAR1-22	Submission Name: Tom Harty	Settlement: Nenagh
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Submission Summary:

This submission seeks to revert the zoning of part of their land in Nenagh to “Existing Residential”, as shown on the map below. The applicant believes that this zoning was mistakenly altered in the County Development Plan to “Town Environs” and should instead reflect the designation from The Draft Nenagh Local Area Plan (July 2023), and The Nenagh Town & Environs Development Plan 2013–2019, where the land was zoned for residential use.



The respondent notes that restoring the “Existing Residential” zoning would support housing policy, enable the completion of one or more houses and make efficient use of the existing infrastructure including footpaths, lighting and an established access.

It is also requested that there is greater coherence and consistency between the Tipperary County Development Plan and the Nenagh Local Area Plan regarding planning policy for social need under policy 5-11 to avoid unintended consequences of unviable or counter-productive planning permissions to meet social needs on land within Town Environs designations or adjacent to such land in the Nenagh Local Area Plan. Proposed new policy 5-17 should be applied consistently, pragmatically and sensibly in planning decision so it does not frustrate the national policy intent of the clause.

Consideration:

The subject lands are located approx. 1.7km south of Nenagh town centre with access from the R500. The area is characterised by a linear one-off dwelling pattern with no access to the town’s waste water treatment network. There are footpaths connecting the site to the town centre. The site is not considered to be sequential in nature nor does it align with the principle of compact growth. It is considered that there are more suitable sites within the settlement boundary to cater for future growth within the Plan period. Furthermore, the scope of the variation is to zone land for largescale residential development in order to facilitate future growth at scale. It is not the intention of the Proposed Variation to zone land for one-off housing.

The application of Development Plan and Local Area Plan policies to individual proposals is a matter for the planning application stage. It should be noted that proposed policy 5-17 relating to single dwellings on land zoned Town Environs, is already contained in the Local Area Plans for Clonmel, Nenagh, Thurles, Roscrea and Carrick-on-Suir and it is now necessary to include this policy in the County Development Plan to ensure there is a consistent policy approach to dwellings located in lands zoned Town Environs across the County and to ensure there is no ‘gap’ in policy as a result of this Variation.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:
 TCC-C1-VAR1-25

Submission Name:
 John Joe Lewis Architectural Services
 on behalf of Daniel Purcell

Settlement:
 Nenagh

Submission Summary:

This submission requests that lands at Cloughjordan Road, Nenagh (identified as Area “A” on the submitted map) be rezoned to Commercial/Industrial as part of the current variation to the Tipperary County Development Plan.



The submission notes that the lands were previously zoned for commercial/industrial use under an earlier Development Plan and notes the site’s strategic location adjoining the existing Lisbunny Industrial Estate.

A further small area of land (Area “B”) is located closer to Nenagh and it is proposed that, due to their constrained, triangular shape and its position between the Cloughjordan Road and the Industrial Estate, it is unsuitable for effective agricultural use, and would be more appropriately zoned for employment-generating commercial or industrial purposes.

Consideration:

Site B is currently zoned ‘Employment’. A large proportion of Site A is also currently zoned ‘Employment’.



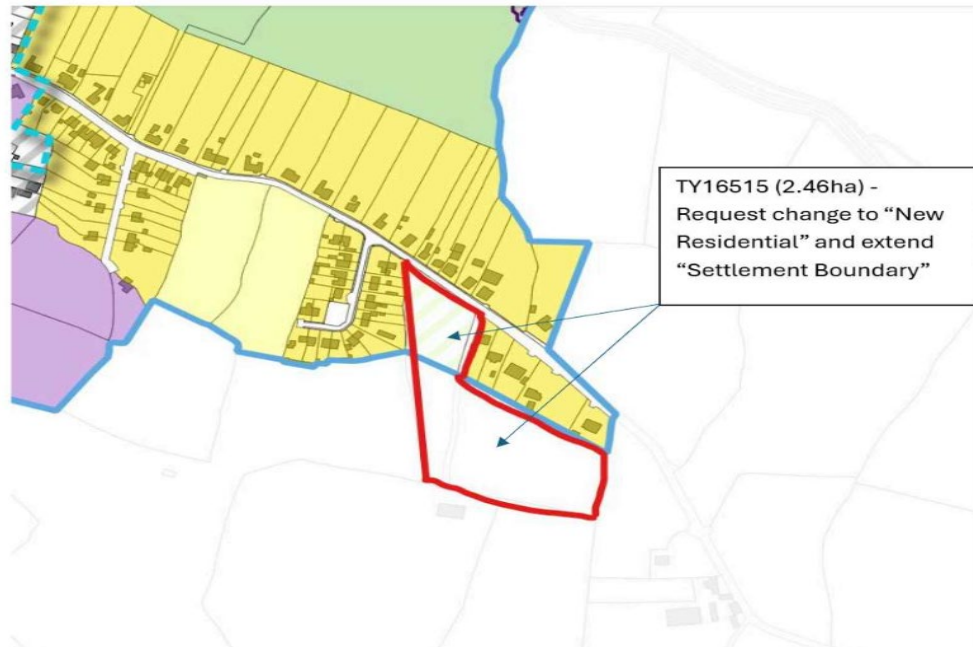
The rezoning of the remainder of Site A for employment purposes is beyond the scope of Variation No. 1. The respondent will have an opportunity to request this zoning change as part of the review of the Tipperary County Development Plan.

Recommendation:

No change to the Proposed Variation is recommended.

<p>Submission Number: TCC-C1-VAR1-30</p>	<p>Submission Name: Cllr. Louise Morgan Walsh & Deputy Alan Kelly TD on behalf of Robert Bourke</p>	<p>Settlement: Borrisokane</p>
<p>Submission Summary:</p>		

This submission seeks the rezoning of 2.46 hectares of land at Cloughjordan Road, Borrisokane (TY16515) from “Agriculture” to “New Residential” and the extension of the settlement boundary.



The submission notes that Borrisokane is a Local Town / Service Centre and is well positioned to accommodate additional housing in line with updated national and regional policy, and that the subject lands represent a logical, compact extension of the existing built-up area. The submission highlights the site’s proximity to town services, existing infrastructure capacity, lack of significant environmental constraints, and overall deliverability within the lifetime of the plan. It states the landowner’s intention to work with voluntary housing bodies to deliver a residential scheme of approximately 86–123 units, subject to planning.

Consideration:

The content of the submission is noted. The majority of the site is located outside the settlement boundary of Borrisokane. The site is not considered to be sequential in nature nor does it align with the principle of compact growth. It is considered that there are more suitable sites within the settlement boundary to cater for future growth within the Plan period. It is considered that the settlement has sufficient land within its existing defined settlement boundary to accommodate projected growth.

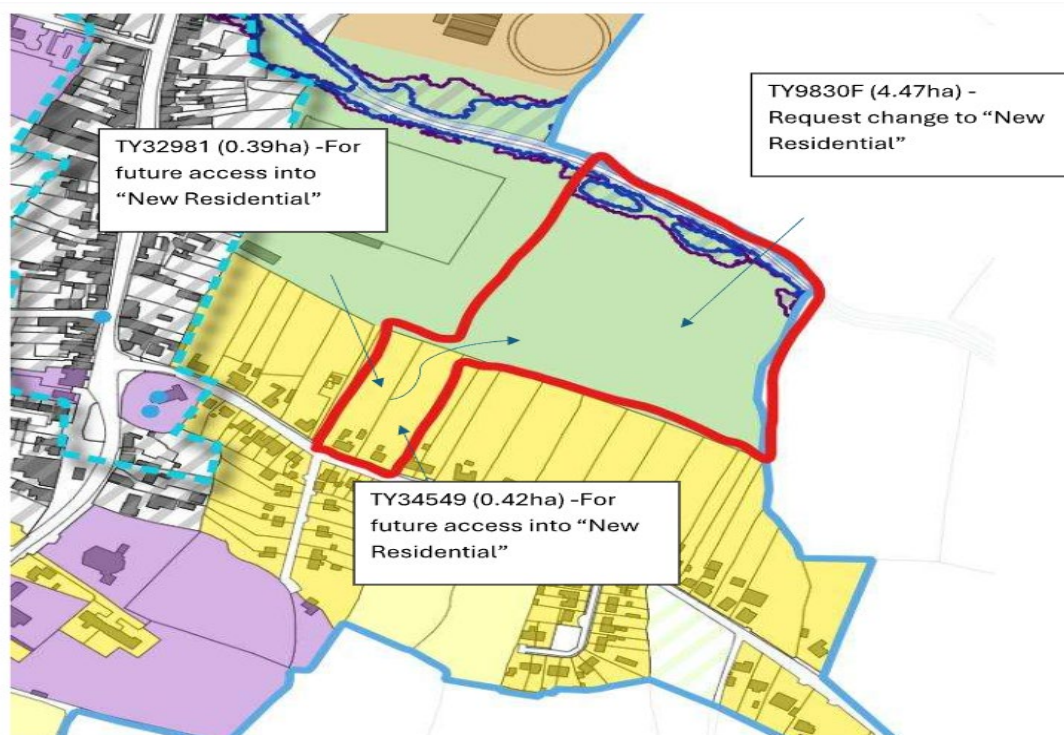
Recommendation:

No change recommended.

Submission Number: TCC-C1-VAR1-31	Submission Name: Cllr. Louise Morgan Walsh & Deputy Alan Kelly TD on behalf of Robert Bourke	Settlement: Borrisokane
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Submission Summary:

This submission seeks the rezoning of lands totalling approximately 5.28 hectares at Cloughjordan Road, Borrisokane, primarily the 4.47-hectare site (TY9830F), from “Open Space & Recreation” to “New Residential”, with adjoining residentially zoned lands redeveloped to facilitate access.



The submission states that Borrisokane, as a Local Town / Service Centre, is well placed to accommodate additional housing in accordance with updated national policy and housing growth targets. It is noted that the subject lands represent a logical and compact extension of the existing built-up area, are within walking distance of town services, benefit from existing infrastructure capacity, and are capable of being developed within the lifetime of the plan. The submission outlines an intention to deliver a high-density residential scheme of approximately 185–264 units in collaboration with voluntary housing bodies, subject to zoning and pre-planning.

Consideration:

The content of the submission is noted. The site is a backland site adjacent to the GAA grounds. The northern periphery of the site is subject to flood zones. The backland part of the site is zoned Open Space and Recreation and is suitably located to facilitate any expansion of the GAA grounds or other recreational uses in the future.

Recommendation:

No change recommended.

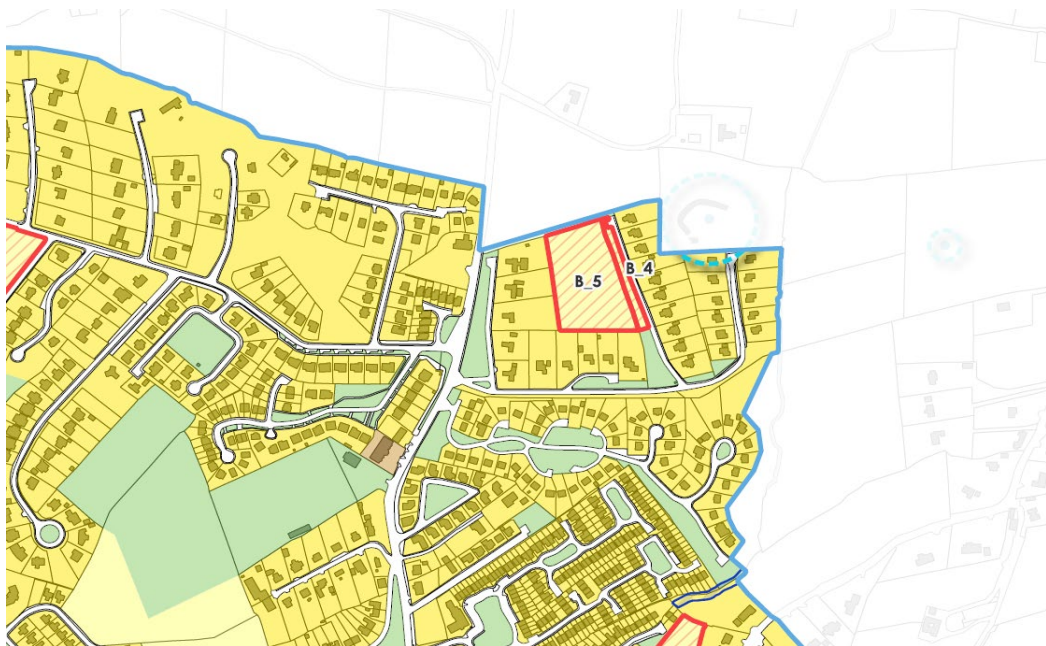
Submission Numbers:	Submission Name:	Settlement:
TCC-C1-VAR1-33	Triona Campbell	Ballina (Site B_4 & B_5)
TCC-C1-VAR1-34	Ciara Dee	
TCC-C1-VAR1-35	Karl Clarke	
TCC-C1-VAR1-36	Gerard O'Mahony	
TCC-C1-VAR1-37	Paddy and Johanna Coleman	
TCC-C1-VAR1-39	Eamonn Power	
TCC-C1-VAR1-40	Caroline Eldridge	
TCC-C1-VAR1-41	Steve Coakley	
TCC-C1-VAR1-42	Marese Coakley	
TCC-C1-VAR1-43	Eoin Cleary	
TCC-C1-VAR1-44	Helena Guerin	
TCC-C1-VAR1-48	Frank Hogan	
TCC-C1-VAR1-53	Liam Rainford	
TCC-C1-VAR1-54	Vincent O'Neill	
TCC-C1-VAR1-65	Amanda Stephens	
TCC-C1-VAR1-79	Paul Hegarty	

Submission Summary:

Several submissions object to the proposed rezoning of Sites B_4 and B_5 from “Amenity” and “Agricultural” to “New Residential”. The key concerns raised in submissions are:

- Absence of Appropriate Assessment (AA) Screening despite proximity to the Lough Derg Shannon SPA and Lower River Shannon SAC
- No published Stage 1 Flood Risk Assessment for lands functioning as natural drainage
- Loss of established amenity/green space, reportedly protected under original planning permissions
- Lack of access, egress, traffic assessment, and pedestrian infrastructure
- Inadequate water services capacity and absence of an Uisce Éireann assessment
- Proposed density and back-land development considered incompatible with existing character of area
- Failure to meet NPF Table 10 (10/15-Minute Town) criteria

The submissions raise broadly similar planning, environmental, infrastructure, and compliance concerns in respect of this site.



Consideration:

The Proposed Variation has been subject to Strategic Environmental Assessment (SEA), Appropriate Assessment (AA), and Strategic Flood Risk Assessment (SFRA) as part of the statutory planning and environmental requirements. The SEA Environmental Report, the AA Natura Impact Report and the SFRA was published as part of the Variation documentation.

The site is located within the defined settlement boundary of Ballina and is adjoined by existing residential dwellings to the south, east and the west. The proposed zoning is consistent with the receiving environment.

The land use planning framework applicable for these sites will ensure that residential developments will be serviced by ancillary infrastructure (including water, waste and transport infrastructure). This is in line with the SEOs defined in the SEA ER for the TCDP.

A bespoke mitigatory policy (11-20 within the SEA published with the Draft Variation) has been defined for this Proposed Variation, which will ensure that existing environmental protection and enhancement policies and objectives in the TCDP will apply, as well appropriate provisions for supporting infrastructure, including energy, traffic and transport, water supply and wastewater infrastructure must be provided for.

A more comprehensive list of existing mitigation measures applicable to Sites B_4 and B_5 can be found in Section 8 of the SEA ER and Section 5 of the NIR. Any significant adverse effects on population and human health and visual amenity will be addressed through this mitigatory framework. Furthermore, the Development Management Standards contained within Volume 3 of the TCDP governs residential development, including requiring private open space and separation distances to avoid impacts on population and human health through proximity.

The TCDP requires development to integrate and respect the character, sensitivity and the value of the receiving landscape (Policies 11-16 & 11-17 refer).

Potential impacts on the Lough Derg SPA and pNHA have been accounted for in the SEA Environmental Report and Natura Impact Report. Lough Derg SPA is located c.780 m to the north-west from these sites and has been addressed in the Draft NIR for the potential of likely significant effects on the qualifying interests of this European Site. The SPA was screened in on the precautionary principle.

The zoning proposals at these sites will be subject to defined mitigatory policies and objectives in the TCDP, including 11-1, 11-2, and 11-3, which impart protections to European Sites and qualifying interests, and existing and proposed Natural Heritage Areas, and prevent any significant adverse impacts on sensitive receptors.

In terms of servicing, the Ballina WWTP and the Ballina Water Supply is indicated as having capacity available on the latest Uisce Éireann Capacity Registers (April 2026). The public sewer and public water mains are available to the site. The development management process requires consultations with Uisce Éireann for any proposed development. Separately, a connection application process is undertaken where Uisce Éireann confirms the feasibility of the water supply and wastewater treatment infrastructure to support any proposed development.

Shannon View and The Beeches has been Taken In Charge by TCC and the land in question does not form part of a previous planning permission. There are footpaths and public lighting serving The Beeches.

The site is located within an established residential area and represents appropriate infill development that will facilitate compact growth and the sequential development of the town in accordance with national policy and guidance.

Any future development of the site will be assessed against national guidance including S.28 Ministerial Guidelines and the policies and development management standards contained in the County Development Plan. Matters of density, detailed design and character, open space provision, drainage and traffic management will be suitably addressed at planning application stage.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-49	Submission Name: Edward Gleeson	Settlement: Ballina
Submission Summary: Request to amend zoning of land from agriculture to residential. It is felt that the lands are ideally suited to development given their location adjacent to the current town boundary.		



Consideration:

The subject land is located outside the settlement boundary of Ballina. It is considered that the settlement has sufficient land within its existing defined settlement boundary to accommodate projected growth.

Recommendation:

No change recommended

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-50	MKO Planning and Environmental Consultants on behalf of Denis and Mary Haverty	Nenagh

Submission Summary:

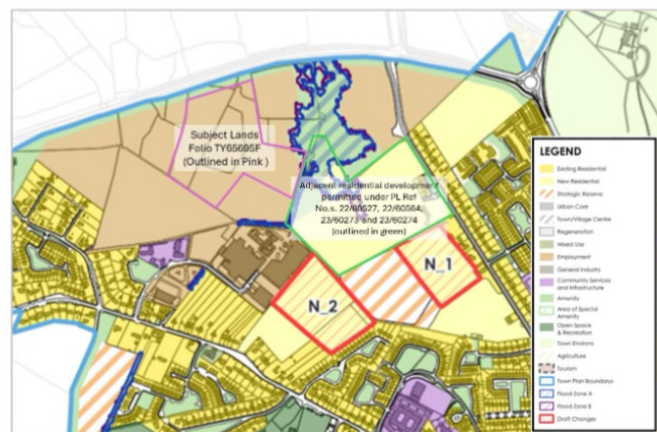
The submission seeks the rezoning of approximately 11.22 hectares of land at Coolaholloga, Richmond, Nenagh from “Employment” to “New Residential”.

The subject lands represent a logical and sustainable location for residential development, given their position within the defined settlement boundary of Nenagh and their immediate adjacency to recently permitted residential schemes along the Dromin Road. The character of the area has transitioned decisively toward residential use and the existing Employment zoning is no longer reflective of the prevailing or emerging land-use pattern.

The subject lands have been assessed by reference to the criteria of a Settlement Capacity Audit. The lands are readily accessible from the existing road network serving adjoining residential developments and are within the functional catchment of Nenagh town centre, allowing for sustainable travel patterns including walking and cycling. Public water and wastewater services are available, with capacity matters capable of being addressed through normal development management processes. The permitted upgrade of the Nenagh Wastewater Treatment Plant will help to support future population growth.

There are no known environmental, flooding, or statutory constraints that would preclude residential development on the lands and adequate social infrastructure exists within Nenagh to support additional housing.

Figure 1: Subject Lands (Folio TY65695F) Outlined in Pink



Consideration:

The site is located c. 2km from the town centre on lands currently zoned for employment uses. The submission gives no indication of where the site will be accessed from with no clear boundary access other than the N52 which is not an appropriate access point. The site may be serviceable once the WWTP in the town is upgraded. The subject lands represent a strategic employment landbank earmarked for the economic development of the town. It is considered that there are more suitable sites within the settlement boundary to cater for future growth within the Plan period.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-51	Submission Name: HRA Planning on behalf of Werdna Ltd - Newport	Settlement: Newport
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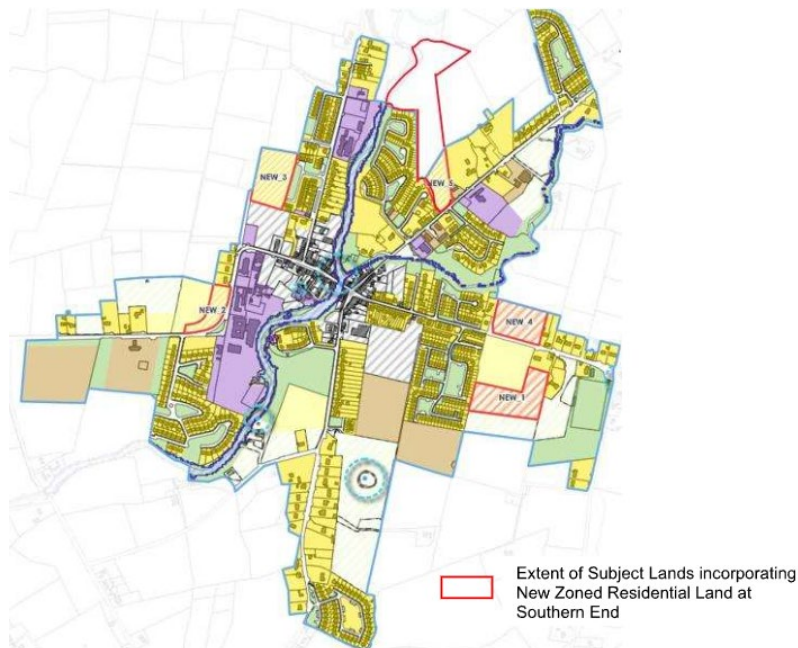
Submission Summary:

Werdna Ltd. welcome the zoning of 0.96 ha of land from employment and enterprise to residential use and considers that there is further opportunity to increase zoning at this location where the landholding is 5.31 ha. The proposed variation has identified only 18% of the landholding for Residential use. In the interest of facilitating sustainable, compact and sequential growth within the defined settlement of Newport, it is requested that the entirety of the site is made available for new residential development.

The Core Strategy Table in the proposed Variation identifies the need for 11.1 ha of zoned residential land up to 2031 inclusive of 50% headroom. It would appear, however, that provision has been made for 9.8 ha including the 6 ha of existing residential zoning and 3.75 ha of proposed new residential zoning. Whilst the proposed Variation also includes for 3.91 ha of Strategic Reserve, the Guidelines clarify that SR should not be included in the residential capacity assessment. Furthermore, the Guidelines also make it clear that planning authorities should consider suitable lands over a 12 year period to encompass this and the next plan period. Based on this rationale, there is a need for an additional 1.3 ha of land to accommodate housing need forecasted to 2031 with additional lands required to a forecasted 12 year period. The subject lands can provide an additional 4.35 ha within 370m of the town centre thereby alleviating the shortfall.

Should the planning authority deem it necessary, a Developer Led Framework can be prepared for the land integrating and extending the green open space along the Mulkar River as a walkway possible connecting to Rosehill. It is considered that development on the subject site will consolidate growth within easy walking distance of the town. The site is fully serviceable, is infill in nature, adjoining residential and commercial development and proximate to schools, community facilities amenities. There are no known environmental, servicing, legal, or flood related constraints hindering potential development. The landowner is currently developing 371 units at Greenpark, Limerick and commits to the delivery of housing on the subject land within the life of the Development Plan subject to permission. Based on the a c. 25 unit per ha density the site has potential to deliver 90-110 units thereby satisfying the housing requirement in the village over the plan period. Of the 6 ha of land zoned for residential development under the TCDP 2022, none has been developed. As detailed in the submission

and confirmed by a letter from the landowner, there is a commitment to act immediately on securing the zoning change.



Consideration:

The site in question is adjoining New 5 to the north east and is in the same ownership as such. While the submission makes an argument for the need for further lands to be zoned within the ‘defined settlement of Newport’, the land is located outside the settlement boundary. It is considered that there is sufficient land within the existing boundary to facilitate future development and that no extension to the boundary is required to accommodate such.

Recommendation:

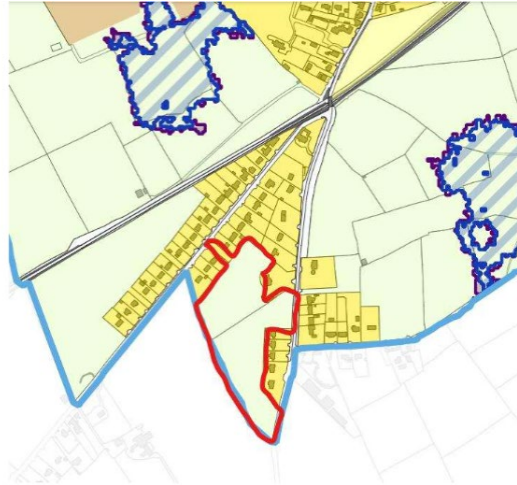
No change

Submission Number: TCC-C1-VAR1-52	Submission Name: Cllr Louise Morgan Walsh	Settlement: Nenagh
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Submission Summary:

Request to rezone land zoned Town Environs to New Residential. Site is located in Benedine on the southern approach to Nenagh in an established residential area. The wider area was previously identified for residential development potential including in the Draft Nenagh LAP (2023) where adjoining land was designated Existing Residential and Serviced Sites. The current zoning appears to be an unintended anomaly arising from the LAP process. The landowner intends to progress residential development proposals subject to the zoning change. The site is proximate to services; benefits from existing infrastructure; aligns with compact growth; is deliverable; and is not constrained by environmental considerations.

It is requested to include the site within the revised zoning map; zone it for residential development; or include the lands within the future development boundary to support phased and sustainable growth.



Screenshot of lands outlined in red currently zoned Town Environs (x,y 585 949; 677 803)

Consideration:

The subject lands are located approx. 1.7km south of Nenagh town centre with accesses from the R500 and the L2141. The area is characterised by a linear one-off dwelling pattern with no access to the town’s wastewater treatment network. There are footpaths connecting the site to the town centre. The site is not considered to be sequential in nature nor does it align with the principle of compact growth. It is considered that there are more suitable sites within the settlement boundary to cater for future growth within the Plan period.

Recommendation:

No change to the Proposed Variation is recommended.

<p>Submission Number: TCC-C1-VAR1-66</p>	<p>Submission Name: Brock McClure on behalf of Double Property Group Ltd</p>	<p>Settlement: Borrisokane</p>
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Submission Summary:

Proposal to zone land in Borrisokane to facilitate residential development to come forward without policy obstruction. It is fundamental that all sites equipped with the necessary infrastructure and services for residential development be released by the Planning Authority to allow for residential development as part of this Variation process to align with the Government’s mandate.

Lands of approx. 1.8 ha are requested to be rezoned from Agricultural to New Residential. The lands are immediately serviceable with water, drainage, utilities and road infrastructure. The land adjoins existing residential development and are highly accessible to schools, shops, public transport and roads. The landowners are eager to bring the site forward for development and have capacity to deliver housing in the short to medium term. The land has the potential to facilitate a range of housing types including cluster housing.

The Planning Authority has made assumptions within the proposed Variation that the lands identified for rezoning will be delivered in the short term; however, no supporting evidence has been provided to demonstrate that these sites can realistically come forward within the required timeframe. Addressing this we bring to the Council’s attention approaches taken by other Local Authorities, that being an open call for lands available for immediate development. Such approach ensures that there is a wide range of options, reducing the risks associated with assumptions on deliverability and improving supply responsiveness.

Double Property Group Ltd. is an established property development company with extensive experience in the delivery of high-quality residential developments. Double Property Group Ltd. is highly committed to providing residential development within Borrisokane and wishes to highlight that they are in a position to provide residential development on their lands subject to the appropriate zoning being in place.

The subject lands are approx. 1.8 ha, bounded to the north and west by greenfield lands, to the south by low density residences and to the east by low density residences and greenfield land. The site is 3 minute walk from Main Street by a footpath and proximate to amenities. The site has access to good connectivity by road and bus.

Table 1 – Bus Routes and Frequency in proximity to subject site



Figure 3 – Subject Site in Context to Borrisokane Town Centre

The site was previously zoned ‘R3 –Medium/ High Density Residential’ with an objective “to provide for medium to high density residential development. The subject lands are located directly south of an Opportunity Site. A planning application was granted in 2009 (0851192) for 55 residential units. A number of these granted units have been built and are currently in ownership of our client as outlined below:



Figure 5 – Site Layout Plan with Currently Built Units outlined in Pink

The planning context for the site aligns with relevant national, regional and local planning policy including, the NPF – First Revision April 2025, NPF Implementation –Housing Growth Requirements (2025), the RSES, the TCDP 2022 – 2028 including the Borrisokane Housing Specific Objectives and Serviced Land Assessment and the Tipperary Housing Strategy 2022 – 2028.

The zoning review undertaken for Borrisokane appears limited in scope and does not adequately consider the potential of readily available lands capable of being brought forward for development within the lifetime of the Development Plan. It is noted that a number of the lands identified for a new residential development within the Borrisokane area are located on the outer edges of the settlement, significantly removed from the town centre and from established services, public transport links and community infrastructure. The subject lands are located in closer proximity to Borrisokane town centre, benefitting from established infrastructure, accessibility to services and strong integration with the town.

The Serviced Land Assessment for the proposed variation did not include the subject site. The SLA criteria if applied would appear as below and would represent Tier 1 land and be appropriate for zoning:

Site Ref.	Availability of Infrastructure at the site					Sustainable Planning Criteria applicable to the site			
	Area Ha	Roads	Footpath	Cycle Lane	Public Lighting	Foul Sewer	Compact Growth	Walking Analysis 5 – 10 mins	Walking Analysis 10 – 15 mins
1.8	✓	✓	X	✓	✓	✓	✓	X	✓

Table 5 – Serviced Land Assessment on Subject Site

It is noted that the site is located in close proximity to existing water, wastewater and other service networks. The provision of connections to these networks would primarily require standard or normal extensions to existing infrastructure, which would be developer-led and developer-funded, as is typical for residential developments of this nature. The omission of this site from the Serviced Land Assessment suggests that not all suitable and deliverable lands within Borrisokane were fully assessed as part of the Variation process.

Consideration:

While an open call for suitable sites was not carried out prior to the Variation being proposed the planning authority is happy to consider suitable proposals at this time. As noted in the submission the proposed site was not included in the SLA as only sites included in the proposed Variation are demonstrated in the interest of providing a concise report. The subject land is abutting the town centre with good access to services and amenities and is considered to be Tier 1 in nature. Given its location and the landowner’s intention to progress with development, it is considered that an amended zoning to allow for residential development would align with sustainable planning principles.

Recommendation:

- Amend zoning from Agriculture to New Residential. (see Amendment 21 and 36 in Part 2)

Submission Number: TCC-C1-VAR1-68	Submission Name: Sarah Conroy	Settlement: Ballina
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Submission Summary:

The respondent objects to the proposed zoning of lands on Grange Road for residential development. Grange Road is not suitable to accommodate increased traffic and any further intensification of use would significantly exacerbate existing congestion issues. Grange Road presents serious traffic concerns with inadequate footpaths and road markings and restricted visibility in places. Given these constraints, the current road network does not have the capacity to safely support residential zoning. Any consideration of such zoning should be contingent on substantial and demonstrable upgrades to the road infrastructure.

Consideration:

It is considered that the proposed zoning of land on Grange Road represents appropriate infill development that will facilitate compact growth and the sequential development of the town. It is considered that the future development of the land could tie in with the existing footpath network and any traffic safety matters would be assessed at planning application stage.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-70	Submission Name: Cullenagh Residents Committee	Settlement: Ballina
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Submission Summary:

The Cullenagh Residents Committee represents the approximately 120 households in the Cullenagh estate in Ballina. We wish to request the restoration of the statutory recognition of the Cullenagh Masterplan which was removed when reference to the Masterplan was dropped from the County Development Plan in the 2022.

Consideration:

The purpose of the proposed Variation No. 1 is to align with ‘The National Planning Framework’s First Revision 2025’ and the ‘Section 28 Guidelines on NPF Implementation – Housing Growth Requirements’ (“S28 guidelines on the NPF”). The proposed Variation seeks to increase the amount of land zoned for residential purposes throughout the County. The subject of this submission is outside the scope of the proposed Variation. It should be noted that any future development in Cullenagh will be guided by national guidance including S.28 Ministerial Guidelines and the policies, zoning objectives and development management standards contained in the County Development Plan.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-71	Submission Name: Byan McCarthy & Associates on behalf of James Coghlan	Settlement: Terryglass
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Submission Summary:

The submission is made on behalf of James Coghlan who owns land in Terryglass (delineated in red below). The submission requests that the Variation is extended to all population centres including Local Service Centres, particularly those with availability of direct access to public infrastructure.

The site in question is located on the periphery of Terryglass and has the benefit of water supply, foul drainage and electricity. The site is located with the speed limits of the village. There are no Protected Structures or Recorded Monuments within the site. Planning permission was previously granted on the site for 4 dwellings (Planning Ref: 07510736, EOD Ref: 11510347). The owner is seeking to develop the site for 5 dwellings and a proposed site layout is provided. The submission is seeking the extension of the settlement boundary of Terryglass to incorporate the site.



Consideration:

While the submission is noted, the settlement of Terryglass is not within the scope of Proposed Variation No. 1, being a lower order settlement in the County which does not contain residential zoning. The respondent will have an opportunity to engage with the Planning Authority as part of the review of the Tipperary County Development Plan. It should be noted that Policy 5-6 of the Tipperary County Development Plan provides for cluster housing developments and serviced sites to be considered in rural settlements in line with land zoning provisions, and immediately adjacent to the boundary.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-81	Hutch O'Malley on behalf of Edward Gleason, Jim Benson & Sheamus O'Donovan	Ballina
Submission Summary:		
<p>This submission requests the zoning of land outside the settlement boundary of Ballina for serviced sites. A potential site layout is included with the submission, with water, wastewater, road and footpath connections indicated.</p>		
<p>The Draft Development Plan underestimates both the extent of housing demand and the settlement's capacity for growth. Historic constraints—including an over-capacity wastewater treatment plant, inadequate road infrastructure and the economic downturn—have artificially suppressed development for over a decade, resulting in significant pent-up demand.</p>		
<p>The Draft Plan provides for population growth of only 263 additional persons for a ten year period from a base of the 2016 population, equivalent to just over 1% of projected countywide growth which is wholly disproportionate for one of the most pressured housing markets in Tipperary.</p>		
<p>The submission notes that a number of residentially zoned lands have been de-zoned without the identification of alternative, suitably serviced sites. Serviced sites are ideally located on the periphery of a settlement. The clustering in the rural villages is not matched or supplemented by a matching policy for Ballina.</p>		
<p>The submission refers to NPO 21 of the NPF. For rural villages such as Ballina, growth must be focused on job creation along with housing.</p>		
<p>The submission proposes specific lands to the east of Ballina village as a suitable location for serviced residential development. These lands are described as effectively functioning as infill, bounded by existing housing and road infrastructure, with direct access to public water and sewer networks and the potential for sustainable drainage solutions. Their location, topography and proximity to existing services are presented as evidence of suitability, while also offering opportunities for enhanced amenity provision such as riverwalks and open space. The lands were previously within the Development Plan settlement boundary.</p>		



Consideration:

The subject land is located outside the settlement boundary of Ballina. It is considered that the settlement has sufficient land within its existing defined settlement boundary to accommodate projected growth and that no extension to the boundary is required to accommodate such. It should be noted that Policy 5-6 of the Tipperary County Development Plan provides for cluster housing developments and serviced sites to be considered in rural settlements in line with land zoning provisions, and immediately adjacent to the boundary.

Recommendation:

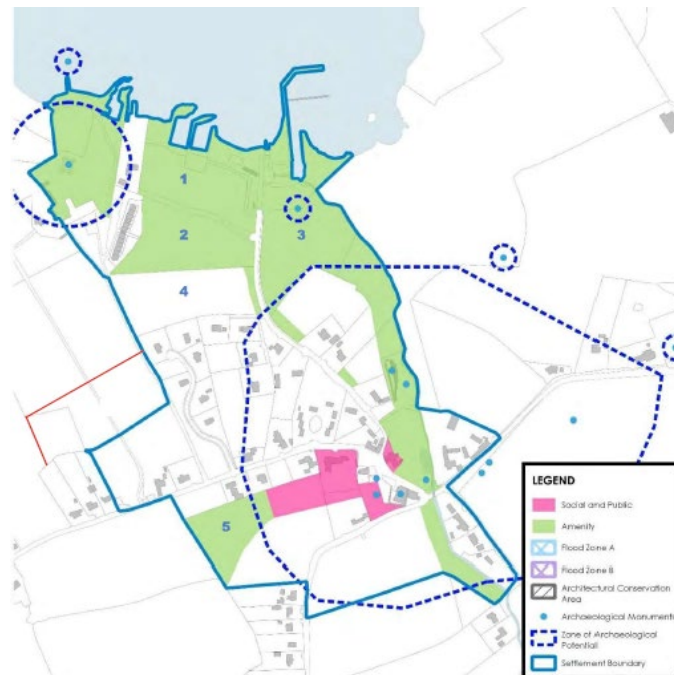
No change recommended

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-82	Hutch O’Malley on behalf of Leslie Shaw	Terryglass

Submission Summary:

The submission is made on behalf of Leslie Shaw who owns land in Terryglass (delineated in red below). It is requested that these lands be included within the revised settlement boundary for Terryglass and have set out that there is a verified shortfall of viable, deliverable residential land in Terryglass to meet the revised housing targets set out in Variation No.1. The subject lands represent the most efficient use of infrastructure and should be classified as Tier 1 (Serviced) Lands under the NPF criteria. These lands are “ready to go” and capable of delivering 20+ Residential units in the short term, supporting the continued viability of Terryglass National School and local retail services. There is capacity in the Terryglass WWTP, compared to the lack of capacity in Cloughjordan and Borrisokane WWTPs. The inclusion of the land represents a logical, sequential extension of the settlement boundary. These lands

are unconstrained, fully serviced, and uniquely positioned to deliver on the housing growth targets mandated by the 2025 NPF revision.



Consideration:

While the submission is noted, the settlement of Terryglass is not within the scope of Proposed Variation No. 1, being a lower order settlement in the County which does not contain residential zoning. The respondent will have an opportunity to engage with the Planning Authority as part of the review of the Tipperary County Development Plan.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-86	Submission Name: Brendan Sheehan	Settlement: Cloughjordan
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Submission Summary:

In the Cloughjordan SCSP-001 Draft Variation No 1 map the "Community Service and Infrastructure" (purple) area centered on Cloughjordan Railway Station appears to include our private house and land belonging to our neighbour. Perhaps this could be corrected.

Consideration:

The Community Services and Infrastructure zoning at this location includes the Railway Station, Station Masters House (now which appears to be in private ownership) and adjoining site. While the Station Masters House is in private ownership, the existing Community Services and Infrastructure zoning does not preclude the continued use of the site as a dwelling.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-88	Kieran Keeney	Ballina
TCC-C1-VAR1-94	Cillian Boyle	
TCC-C1-VAR1-104	Zaklina Flis	
TCC-C1-VAR1-105	Tomak Marcak	
TCC-C1-VAR1-106	Chiara Keeney	
TCC-C1-VAR1-107	The Wooden Spoon	
TCC-C1-VAR1-108	Freddy McInerney	
TCC-C1-VAR1-114	Cllr. Dr.Phyll Bugler on behalf of Bernie Hurley	

Submission Summary:

Several submissions highlight a lack of public parking within the settlement of Ballina. The settlement relies heavily on McKeoghs private car park.

Consideration:

The purpose of the proposed Variation No. 1 is to align with ‘The National Planning Framework’s First Revision 2025’ and the ‘Section 28 Guidelines on NPF Implementation – Housing Growth Requirements’ (“S28 guidelines on the NPF”). The proposed Variation seeks to increase the amount of land zoned for residential purposes throughout the County. The provision of car parking in the town centre of Ballina is outside the scope of the proposed Variation. It should be noted that any future development of the land proposed to be zoned for residential purposes would be required to provide car parking in accordance with the relevant S.28 Compact Settlement Guidelines (2024) and the car parking standards contained in the County Development Plan. Car parking provision would be assessed as part of any future planning application.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-101	Michael Minogue	Ballina

Submission Summary:

This submission notes the landowner does not want their land on Grange Road Ballina zoned residential. The landowner wants his land for his 3 children. He further requests that all future correspondence regarding these lands be made in writing directly to him.

Consideration:

The submission relates to Site B_2 in Ballina, which is proposed to be rezoned from ‘Amenity’ to ‘New Residential’. The landowner wants the land for his children but residential development is not permitted in the current Amenity zoning. The site is located within the settlement boundary of Ballina and have been identified as suitable for residential zoning based on its location, proximity to existing services and infrastructure, and the need to facilitate compact and sequential residential growth.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-102	Patrick Rohan	Ballina

Submission Summary:

This submission relates to the proposed zoning of lands at O’Brien’s Lane, Ballina, as “Strategic Reserve”, in the Proposed Variation No.1. The respondent states that they do not wish the lands to be zoned for residential purposes and raises concerns regarding the narrow width of O’Brien’s Lane, existing traffic conditions, and inadequate sightlines at the junction with Main Street, Ballina.

Consideration:

The submission relates to Site B_3 on O’Briens Lane in Ballina. 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. The activation of Site B_3 is dependant on development of the adjoining New Residential zoned land on O’Briens Lane. It is not envisaged that this land would be required to meet the housing targets contained in the Core Strategy. As such, the land can be reverted back to Agricultural zoning.

Recommendation:

- Amend the Ballina Zoning Map to omit Site B_3 from the Proposed Variation. Site B_3 will remain zoned Agriculture (see Amendment 17 and 34 in Part 2).

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-103	Noel & Rosemarie McKeogh on behalf of McKeoghs Hardware	Ballina

Submission Summary:

This submission highlights a concern with the availability of public parking off Main Street in Ballina and in particular a reliance of multiple businesses and visitors on the private car park owned by the respondent. There does not appear to be any specific outline or clear plan to address the serious lack of parking off Main Street. The respondent also refers to previously proposed parking provision near Ballina Church that has not been delivered and outlines the negative impact of inadequate parking on business viability within the community.

The submission also requests a review of the zoning of lands owned by the respondent, including lands zoned “Community Services and Infrastructure” behind McKeoghs Hardware. It is requested that this zoning be changed to allow for the future expansion of the business and for other appropriate facilities or uses that would be beneficial to the centre of Ballina.

The submission also requests that lands zoned “Amenity” / Flood Zone B at Lakeside Drive, be reviewed and changed to allow for appropriate development that would be conducive to the area and beneficial to Ballina. It is submitted that the Flood Zone B designation is associated with a previous drainage issue that can be resolved.

Consideration:

Car Parking

The proposed Variation seeks to increase the amount of land zoned for residential purposes throughout the County. The provision of car parking in the town centre of Ballina is outside the scope of the proposed Variation. It should be noted that any future development of the land proposed to be zoned for residential purposes would be required to provide car parking in accordance with the relevant S.28 Compact Settlement Guidelines (2024) and the car parking standards contained in the County Development Plan. Car parking provision would be assessed as part of any future planning application.

Community Services & Infrastructure Zoning

The request to re-zone the land currently zoned ‘Community Services & Infrastructure’ to the rear of McKeoghs Hardware to facilitate the expansion of the business and other town centre uses is outside the scope of this Variation. The Proposed Variation seeks to ensure there is sufficient residential zoned land to cater for housing growth targets. The respondent will have an opportunity to request this particular zoning change as part of the review of the Tipperary County Development Plan.

Lands zoned “Amenity” / Flood Zone B at Lakeside Drive

The Amenity zoning of the site at this location is due to its location in Flood Zone B. The flood zones are based on detailed flood modelling data. Given this designation, it is not considered appropriate to re-zone the site for residential purposes, which is considered a vulnerable use. Any other re-zoning request is outside the scope of this Variation.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-109	Cllr Dr Phyll Bugler	Ballina

Submission Summary:

The submission raises several issues that can be summarised as follows:

- Traffic safety issues with residential zoned land on Quarry Lane, Grange Road and Shannon View / The Beeches.
- Traffic safety issues with land zoned Strategic Reserve on O'Briens Lane.
- Extent of Amenity zoning at Lakeside Drive is too high and this area is important as town centre development land.
- Land zoned 'Town Centre' between Mollys Bar & Restaurant and Ballina Quay is prone to extreme flooding. This area is an SAC.
- Need for additional public car parking in Ballina.
- Need for a tourist office / interpretative centre in Ballina.
- Need for more community and sports facilities in Ballina.

Consideration:

The submission is noted. The concerns in respect of tourist facilities and town centre car parking in Ballina are acknowledged; however these matters are beyond the scope of this Variation. The existing Town Centre zoning in Ballina is also beyond the scope of this Variation.

It is considered that the zoning of land on Grange Road, Shannon View / The Beeches and Quarry Lane represents appropriate infill development that will facilitate compact growth and the sequential development of the town. It is considered that traffic safety and management would be assessed at planning application stage.

The Strategic Reserve land on O'Briens Lane is proposed to be omitted from the Variation (see response to Submission No. 102 and Amendment 17 and 34 in Part 2).

In relation to the Amenity zoning on Lakeside Drive, the Amenity zoning of the site at this location is due to its location in Flood Zone B. The flood zones are based on detailed flood modelling data. Given this designation, it is not considered appropriate to re-zone the site for residential purposes, which is considered a vulnerable use. Any other re-zoning request is outside the scope of this Variation.

The need for more sports and community facilities in Ballina is also noted. While this matter is not directly related to the Proposed Variation, it is noted that there is land zoned for such uses in Ballina.

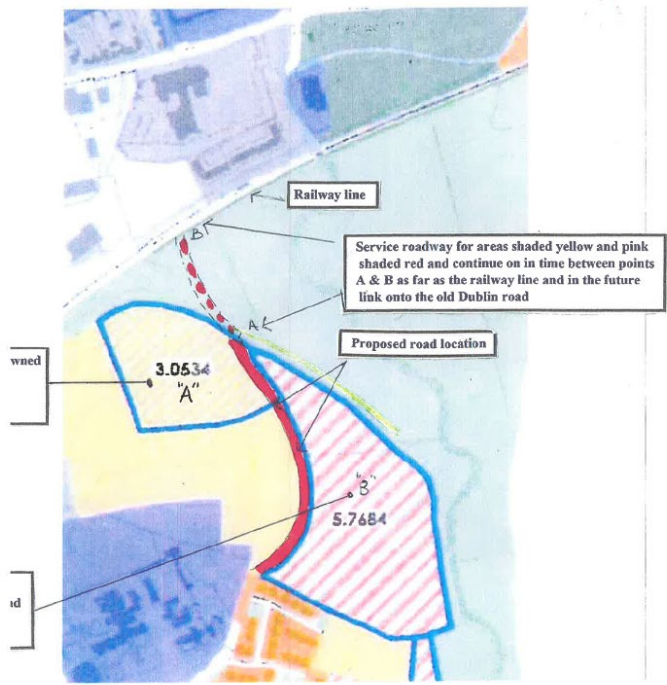
Recommendation:

- Amend the draft Variation to omit Site B_3 from the Proposed Variation (See Amendment 17 and 34 in Part 2)

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-110	Albert Purcell	Nenagh

Submission Summary:

This submission seeks the rezoning of approximately 5.76 hectares of lands at Tyone, Nenagh (identified as Area “B”) from “Agricultural” to “New Residential”. The submission notes that an adjoining area of approximately 3.05 hectares (Area “A”) is already zoned for residential use and is intended to be developed, which would facilitate access to services and infrastructure for the wider site. It is argued that the development of both areas would contribute to alleviating the housing shortage in Nenagh and enable the delivery of a new access road, potentially supporting the Council’s long-term objective of linking the Thurles Road to the Old Dublin Road to provide a bypass of Nenagh town.



Consideration:

As part of the Variation, it is proposed to rezone Site A from Strategic Reserve to New Residential. It is also proposed to rezone Site B from Town Environs to Strategic Reserve. It is

not considered appropriate to zone Site B ‘New Residential’ at this time, having regard to the quantum of New Residential zoned land at this location. Notwithstanding this, proposed Policy 5-18 allows for the release of Strategic Reserve lands under certain criteria, in instances where a substantial portion of ‘New Residential’ zoned land has been developed / committed for development, or in instances where ‘New Residential’ zoned land is not forthcoming for development, through inactivity or other reasons. This will ensure that the delivery of housing, to comply with housing targets set at national level, is not delayed or restricted.

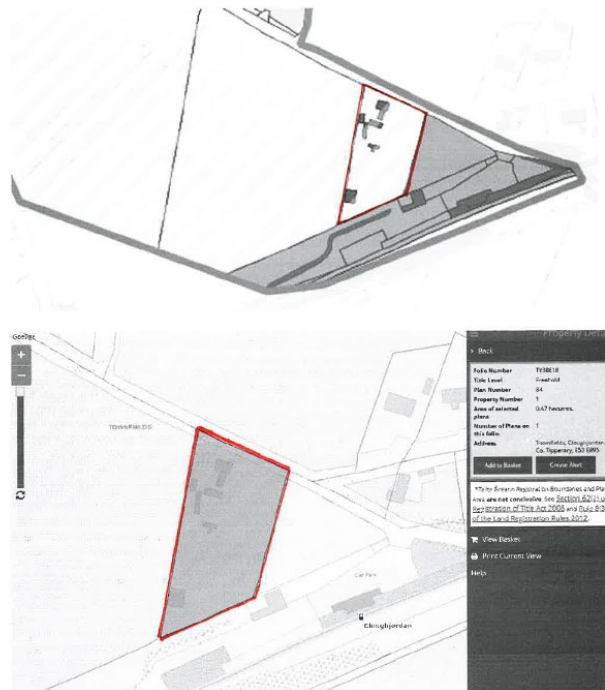
Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-111	Submission Name: Michael Gleeson	Settlement: Cloughjordan
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Submission Summary:

This submission seeks amendments to zoning designations within the Cloughjordan settlement.



Firstly, it requests that lands comprising an established dwelling within the village boundary, currently zoned as “Agricultural” and identified within Folio TY38618 (0.47 ha), be rezoned to “Existing Residential” to reflect its established non-agricultural use.

Secondly, the submission questions the extent of lands zoned “Community Services and Infrastructure” adjoining Cloughjordan Railway Station, stating that this zoning is excessive relative to the scale and operational needs of the station, with significant unused land already available within the existing station site. The submission requests that the additional lands identified be removed from this zoning on the basis that the designation is overly restrictive and unnecessary.

Consideration:

While the site in question contains an existing dwelling, ‘Agriculture’ is considered an appropriate zoning for the site having regard to the S. 28 Development Plan Guidelines (2022) in respect of compact growth, sequential development and servicing. The site is located c. 1km from the village centre, with vacant land zoned ‘Agriculture’ separating the site from the village. The public sewer is not available to the site. No change to the Proposed Variation is therefore recommended.

The existing Social and Public zoning of the adjoining site is addressed in Submission No. TCC-C1-VAR1-2 / TCC-C1-VAR1-80, which recommends no change to the Proposed Variation in respect of this site.

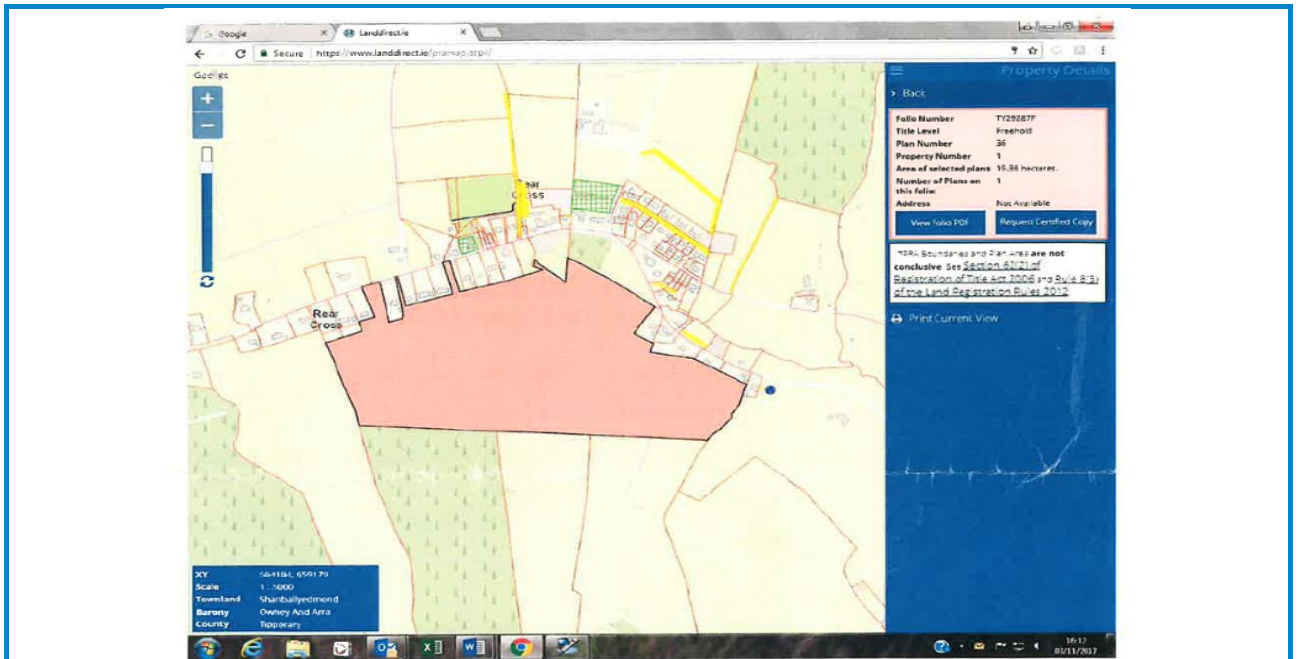
Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-112	PJ Caplis	Rear Cross

Submission Summary:

This submission requests the rezoning of lands under Folio TY29287F, located in Shanballyedmond, Rear Cross, Co. Tipperary, from “Amenity” zoning to “Residential” zoning as part of Variation No. 1 to the Tipperary County Development Plan 2022–2028.



The landowner notes that a portion of the lands was previously zoned for residential use but has since been rezoned as amenity. The submission seeks reinstatement of residential zoning to allow housing development on the site, which comprises approximately 19.7 hectares and is held in freehold ownership.

Consideration:

While the submission is noted, the settlement of Rearcross is not within the scope of Proposed Variation No. 1, being a lower order settlement in the County which does not contain residential zoning. The respondent will have an opportunity to engage with the Planning Authority as part of the review of the Tipperary County Development Plan.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-113	Submission Name: Mairéad O'Neill	Settlement: Kilkeary
Submission Summary:		
This submission, made on behalf of the Kilkeary Tidy Towns Committee, seeks the formal designation of Kilkeary as a recognised settlement in the forthcoming Tipperary County Development Plan. It outlines that Kilkeary functions as an established and cohesive rural		

community with a resident population, strong social and cultural ties, local economic and agricultural activity, and proximity to Nenagh and existing services.

The submission notes that the absence of formal settlement status restricts community-led development, sustainable rural housing, population retention, managed infill development, and long-term planning certainty for local families. It requests that the Council assess Kilkeary under the settlement hierarchy, define a settlement boundary, recognise its community characteristics, and include it in the Development Plan under an appropriate settlement category.

Consideration:

While the submission is noted, a review of the County Settlement Hierarchy is not within the scope of Proposed Variation No. 1. The respondent will have an opportunity to engage with the Planning Authority as part of the review of the Tipperary County Development Plan.

Recommendation:

No change to the Proposed Variation is recommended.

2.4 Individual Submissions – Clonmel MD

Submission Number: TCC-C1-VAR1-6	Submission Name: Will McGarry & Associates on behalf of Carmac Investments	Settlement: Clonmel
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Submission Summary:

The submission relates to land at Longfield, Cashel Road, Clonmel and is made on behalf of Carmac Investments who have control of the land. The submission seeks the change of zoning from ‘Amenity’ to Residential. The site measures approx. 0.42 hectare, is located within the Longfield Housing Estate, fully serviced and accessed via the existing estate roadway. The site was previously zoned Residential in The Clonmel and Environs Town development Plan 2013. The site previously formed part of the overall estate with planning permission which expired in 2017.

It is submitted that rezoning this site, presents an opportunity to meet housing demand set out in the NPF Implementation Guidelines, delivering a possible 30 to 50 units to the local market. The applicants are ready to proceed and lodge a planning application for development on these lands.



Consideration:

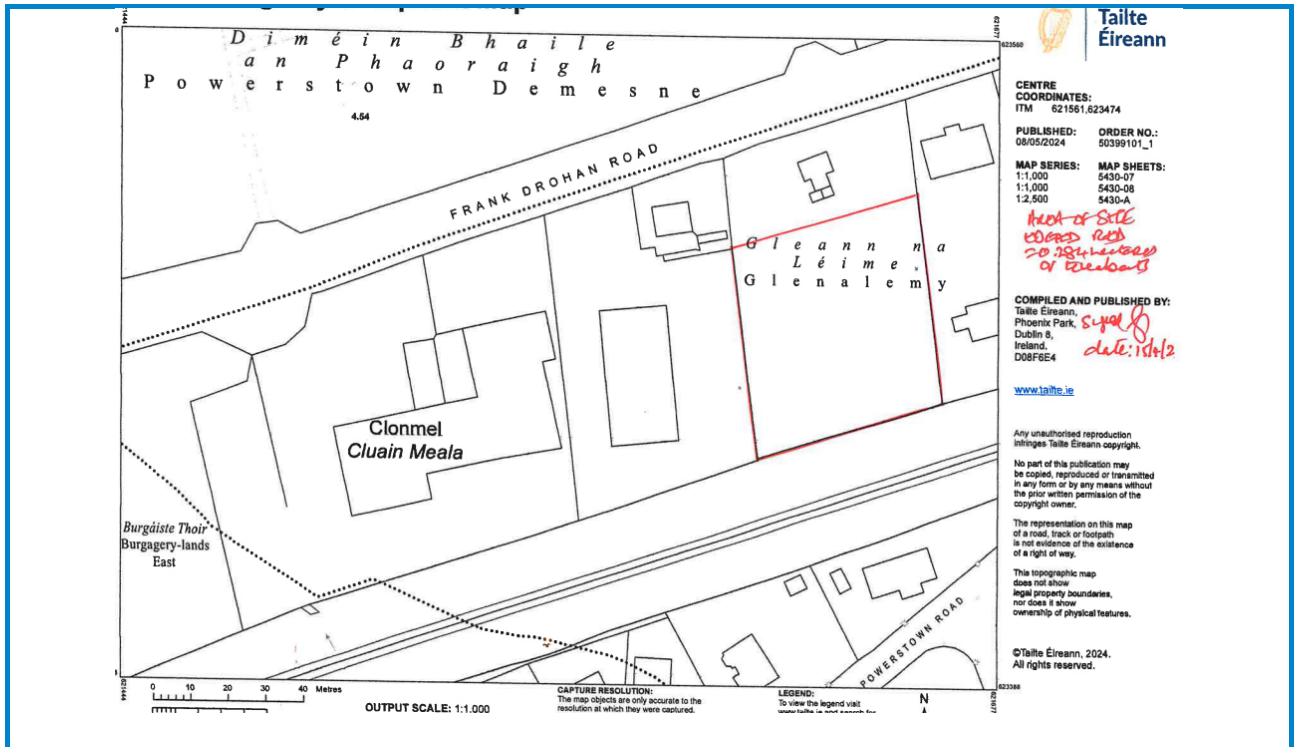
The submission is noted. The site is located in a residential area on the entrance road to the existing Longfield Estate. The location is identified within the corridor of the N24 Waterford to Cahir project, for a proposed new ‘urban road link’ within the northern environs of Clonmel. The submission notes that the site is 0.4 hectare. However, there are factors that would likely limit the developable area of the site. The site is irregular in shape and at the site boundary the land falls steeply to the south to the rear gardens of an existing housing development. It is noted that within Longfield Estate there are lands that are zoned ‘New Residential’ under the current Clonmel and Environs Local Area Plan. These lands are available for residential development.

It is considered that the lands in Clonmel proposed for residential zoning under this Variation are adequate and more suitably located to meet the future growth requirements of the town.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-23	Ken Hogan	Clonmel
Submission Summary:		
<p>This submission requests the re-zoning of part of the owner’s lands at Gleanaleamy, Powerstown, Clonmel, from residential to a zoning to support economic activity.</p>		
<p>The area was deemed unsuitable for residential planning. A local enterprise wishes to purchase the site to expand and enhance current operations and workforce.</p>		
<p>The submission requests that the roadside portion of the folio remain residential as the intention of the owner is to renovate the property and return it to habitable condition.</p>		
<p>An attached map shows the area that is requested to rezone for employment in red.</p>		



Consideration:

The contents of the submission are noted. The site is accessed from the N24 Frank Drohan Road. A large part of the site lies within the identified Preferred Transport Solution corridor for the N24 Waterford to Cahir Scheme.

The site is zoned ‘Existing Residential’ under the Clonmel and Environs Local Area Plan 2024-2030. The site, along with adjacent dwellings, form a larger area of ‘Existing Residential’ zoning and no change to this zoning has been proposed under Proposed Variation No. 1.

Proposed Variation No. 1 has sought to zone sufficient residential land to cater for the housing targets for County Tipperary to 2031. A review of employment lands has not formed part of this variation and is beyond the scope of the Variation. This may be considered at a future time in connection with the County Development Plan review.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-27	Submission Name: Donal McGrath	Settlement: Clonmel
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Submission Summary:

This submission relates to lands at the McGrath family farm, Abbey Farm, Clonmel.

Part of the landholding is zoned New Residential in the Clonmel Local Area Plan. The Proposed Variation proposes to zone another section of the landholding to ‘Strategic Reserve’ which will eventually be zoned ‘New Residential’ and the remaining section zoned as ‘Amenity’.

While the remaining section of land could in theory be farmed, this would in practice be almost impossible to achieve as there would be no access to the parcel of land.

In light of this issue and to assist in resolving the Clonmel housing supply problems requests that Tipperary County Council rezone all of the lands to New Residential.



Figure 2 - Requested that lands covered by blue hatching are zoned New Residential

Consideration:

The contents of the submission are noted. The lands are located in Inishlounaght at the western edge of the settlement boundary for Clonmel and adjacent to the settlement boundary for Marlfield.

It is noted that some errors have been made reading the zoning map and set out the proposed zoning objectives here.

In the Clonmel Local Area Plan the landholding is split across two zoning objectives, the northern section is zoned 'New Residential' and the southern section is zoned 'Town Environs'. The Variation proposes to change the zoning on the southeast section to 'New Residential'. This would leave the Southwest section as 'Town Environs' as it currently is in the Clonmel LAP.

It is noted from the submission that access difficulties would arise should the northern and south-eastern portion of the lands be developed. The objective of the Variation is that the lands designated for New Residential would be brought forward for development during the lifetime of this plan. In order to meet this objective, it is recommended that the entire landholding is zoned for residential use.

Recommendation:

- Extend the 'New Residential' zoning to the full site, (see Amendment 3 and 27 in Part 2)

Submission Number: TCC-C1-VAR1-32	Submission Name: Tyrone O'Donnell	Settlement: Clonmel
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Submission Summary:

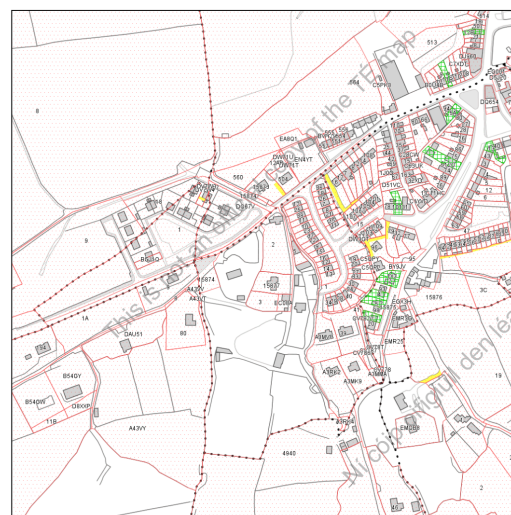
The submission seeks consideration of the inclusion of glamping pod as a permissible or open for consideration use within lands zoned for residential development in the Tipperary County Development Plan 2022-2028.

Provide policy clarification confirming that such development may be assessed on a case-by-case basis within existing residential lands.

This submission relates to a proposal to develop low impact, short term tourist accommodation glamping pods on family lands at Cascade Rd, Dungarvan Road, Clonmel. The lands are currently zoned Existing Residential.

The submission includes the rationale for the proposal as low impact and sympathetic to the landscape and site constraints and resulting in tourism diversification.

Pre-planning consultation with TCC has taken place on this proposal. Maps and multiple photographs are attached to submission.



Taite Eireann
 Clonmel, Liscull,
 Southdown,
 Registration, Valuation,
 Surveying

Official Title Eireann Registration Map

This map should be read in conjunction with the following:

Title Eireann (TE) Registration mapping is based on TE Surveying mapping. Where TE Registration maps are printed at a scale that is larger than the TE Surveying scale, accuracy is limited to that of the TE Surveying map scale.

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Legend:

- Freehold
- Leasehold
- Subleasehold
- 'S' Register

Burdens (may not all be represented on map):

- Right of Way / Wayleave
- Turbary
- Pipeline
- Well
- Pump
- Septic Tank
- Scale Pit

A full list of burdens and their symbols can be found at: www.taite.ie/taite

Title Eireann Registration operates a non-conclusive boundary system. The TE Registration map identifies properties not boundaries, meaning neither the description of land in a folio nor its identification by reference to a TE Registration map is conclusive as to the boundaries of land.

(See Section 85 of the Registration of Title Act, 1964). As inserted by Section 62 of the Registration of Deed and Title Act 2006.

Creation Date: Sunday, April 12, 2026 4:26:51 PM

Consideration:

The submission is noted. Under the Clonmel & Environs Local Area Plan 2024-2030 the lands are zoned 'Existing Residential', with the description of such zoning as *'Existing predominantly residential areas allowing for the protection of existing amenity balanced with new infill development.'*

Proposed Variation No. 1 has sought to zone sufficient residential land to cater for the housing targets for County Tipperary to 2031. A review of lands other than those that can accommodate new residential development has not formed part of this variation. This may be considered at a future time in connection with the County Development Plan review.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-85

Submission Name:

Michael O'Donnell

Settlement:

Clonmel

Submission Summary:

The submission is additional information, two images, in connection with submission TCC C1 VAR1 32, lands at Cascade Rd, Dungarvan Road, Clonmel.



Consideration:

Please refer to the consideration of submission TCC-C1-VAR1-32

Recommendation:

- Refer to the recommendation of submission TCC-C1-VAR1-32

Submission Number: TCC-C1-VAR1-46	Submission Name: Michael Ryan	Settlement: Ballyclerihan
Submission Summary:		
<p>The submission refers to the lack of public transport in the village and notes the lack of a bus stop at Abbot for residents.</p> <p>Notes that land BC1 is owned by the church and is an amenity site for the village.</p> <p>The Cahir Road is small and will struggle with extra traffic. It is prone to flooding and in poor condition.</p>		
Consideration:		
<p>The contents of the submission are noted. It is acknowledged that there is currently a low provision of public transport available to and from the settlement.</p> <p>BC_1 is part of a larger land parcel that is currently zoned ‘Amenity’ in the TCDP 2022-2028. Proposed Variation No. 1 has sought to zone a large section of this land as ‘New Residential’ while maintaining a section for Amenity.</p> <p>While this Proposed Variation will reduce the quantum of Amenity zoned land within the settlement boundary, there are several existing community and recreational facilities in Ballyclerihan including the Clerihan Community Park.</p> <p>BC_1 is located in the urban core of the settlement and would contribute to compact growth and sustainable planning objectives.</p> <p>The purpose of the Proposed Variation is to zone sufficient residential land to cater for the housing targets for Tipperary to 2031 and thereby ensure that the Tipperary County Development Plan is consistent with national policy and guidance.</p>		
Recommendation:		
No change to the Proposed Variation is recommended.		

Submission Number: TCC-C1-VAR1-61	Submission Name: Conroy Architects on behalf of Mr. Kieran Ryan	Settlement: Ballyclerihan
Submission Summary:		

The submission requests that Mr. Kieran Ryans lands at Knockeevan, Ballyclerihan are zoned for residential use.

Rationale in support of this request:

- Opportunity to deliver housing to meet housing need
- Close proximity to village core, and would bring positive and beneficial impact
- Close to services, infrastructure, amenities
- Lands connect community park to the village core.

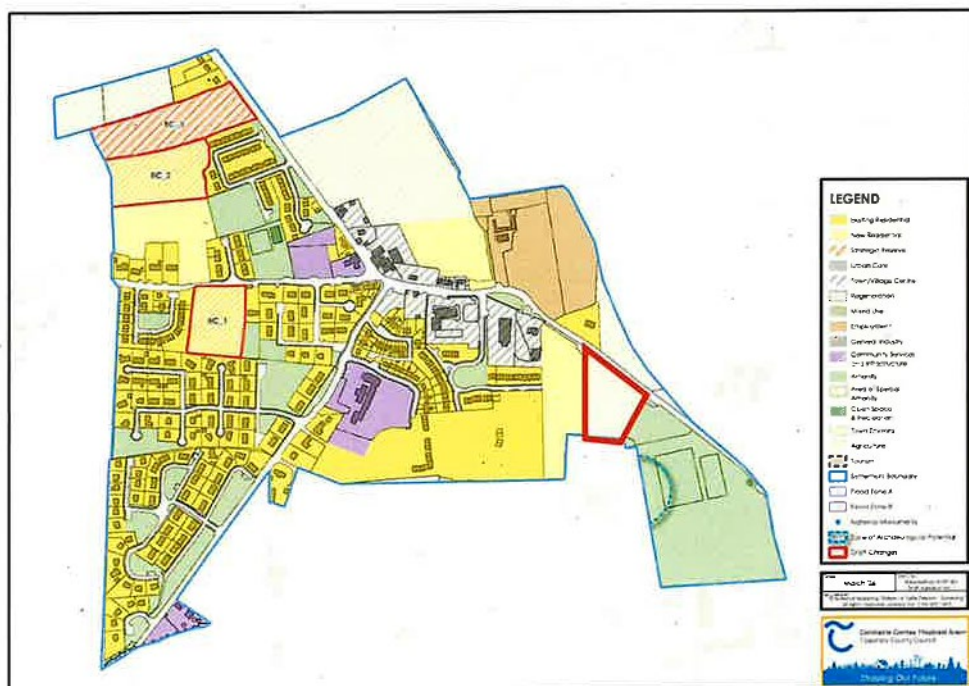


Figure 1. Site Location outlined Red (image credit Tipp CoCo)

Consideration:

The contents of the submission are noted. The land lies within the settlement boundary on the R688, Clonmel Road, located adjacent to the Clerihan Community Park. Under the current Tipperary County Development Plan 2022-2028, the lands are zoned ‘Agriculture’. It has not been proposed to change this zoning under the Proposed Variation No. 1.

Ballyclerihan is identified as a ‘Service Centre’ in the settlement hierarchy.

The core strategy identifies a housing requirement for 65 units for Ballyclerihan to 2031. This increases to 97 units when 50% headroom is applied. It is considered that adequate land, located in central areas of the settlement have been identified for future development. Nonetheless, it is considered that subject lands could be zoned Strategic Reserve, allowing it to be released for residential development under certain circumstances to ensure that the

delivery of housing, to comply with housing targets set at national level, is not delayed or restricted.

Recommendation:

- It is recommended to change the zoning of the land from Agriculture to Strategic Reserve, (see Amendment 18 and 35 in Part 2).

Submission Number: TCC-C1-VAR1-98	Submission Name: Kplan Community Centre CLG	Settlement: Kilsheelan
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Submission Summary:

The submission is from a community group who own and operate community facilities in Kilsheelan and requests that all of land KL_2 is zoned for community services.

The submission notes that part of their land is proposed to be zoned for New Residential (part of KL_2). This proposed zoning is not compatible with current uses and future community plans and request this is reconsidered.

The remaining land in KL_2, while not in the ownership of the community, was always zoned for community use. The village has grown from 160 houses in 2007 to 350 dwellings and 24 more in recent period. The entire KL_2 lands and land beside it were planned to provide community services to cater for the disproportionate growth.

The submission notes that the zoning ‘amenity’ is applied to their lands and requests this is changed to ‘community’ as a more appropriate zoning.

Consideration:

The contents of the submission are noted. The lands marked KL_2 in the proposed Variation No 1. covers an area over two land ownerships.

The uses of the community land with indoor and outdoor facilities meets the objective of Community Services and Infrastructure; ‘*To provide and improve community social and public facilities and infrastructure*’.

It is acknowledged that a zoning of social and Public was attached to the land in the south Tipperary County Development Plan 2009. The zoning on the land was changed to ‘Amenity’ in the Tipperary County Development Plan 2022-2028 where the objective of Amenity is ‘*to provide, preserve and enhance open space and amenity uses.*’

Proposed Variation No. 1 seeks to ensure that sufficient residential zoned lands are available to facilitate the achievement of housing growth requirements over the plan period.

Kilsheelan is unusual as there are a number of constraints that restrict the land available for new residential zoning. This includes the Lower Suir SAC, flood zones, the rail line, the National Route N24, and the preferred transport solution corridor for the N24 which runs to the north of the rail line. Together these elements act to reduce the options for sites that could deliver new residential development under this plan period.

There has been strong growth in the Village and an investment in the upgrade of water infrastructure and upgrades to social infrastructure including the national school and community facilities.

Site KL_2 could facilitate new residential development in the village for this plan period and beyond and ensure vitality and a modest level of growth in the village.

Recommendation:

- It is recommended to reduce the area of KL_2 to correspond to the single landholding to the east (see Amendment 24 and 38 in Part 2).
- It is recommended to change the zoning of the landholding of Kplan Community Centre CLG to reflect the current uses of the land, (see Amendment 25 in Part 2).

2.5 Individual Submissions – Carrick-on-Suir MD

Submission Number: TCC-C1-VAR1-28	Submission Name: Jane Holohan	Settlement: Fethard
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Submission Summary:

This submission requests the re-zoning of lands at Moneypark Fethard for residential development, to help meet the housing demand in Fethard.

- The subject lands are located immediately outside the existing town boundary of Fethard but are close to the town centre, all services, amenities, and employment opportunities.
- The lands are situated within the 50 km/h speed limit zone,
- adjacent to the Fethard Wastewater Treatment Plant, services in close proximity,
- The lands were previously tested by Tipperary County Council in the 1970s and were deemed suitable for residential development
- The site represents a logical and sustainable extension of the town, consistent with compact growth principles and efficient land use.



Consideration:

The contents of the submission are noted. The lands are located southeast of the town and lie outside the current settlement boundary of Fethard. It is considered that the land within the settlement boundary proposed for residential zoning under this Variation is adequate to meet the future growth requirements of the town and is more appropriately located in terms of compact growth, sequential development and servicing.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-29	Conroy Architects on behalf of JSF Property Holding Limited	Carrick-on-Suir

Submission Summary:

The submission is made on behalf of JSF Property Holding Ltd., in support of the proposed rezoning of lands at Ballylynch (COS-2), Carrick-on-Suir, from ‘Amenity’ to ‘New Residential’ zoning.

- The site is serviced (roads, footpaths, water supply, public lighting, foul and surface water infrastructure) and is capable of being connected to the existing cycle network.
- consolidation of residential urban edge where it meets employment zoned land.
- Site within 1500m of the town core (within 20-minute walking distance). Established neighbourhood facilities located within 5-minute walk.
- Residential development of the land would deliver a positive effect on adjoining estate, investment and revitalisation of the area

JSF Property Holding Ltd have a record of delivering residential developments in Tipperary and are currently on site in Carrick-on-Suir and Cashel. The proposed zoning of this site presents an opportunity for timely delivery of a residential development.



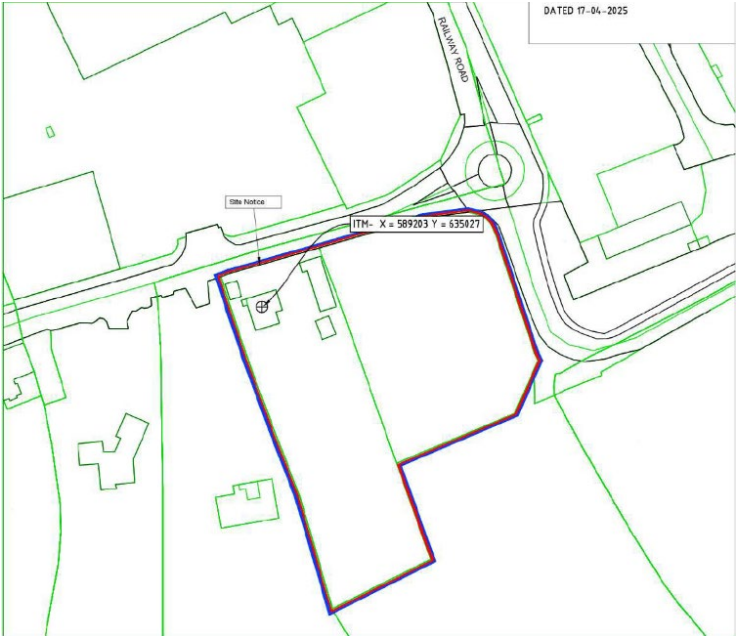
Consideration:

The contents of the submission and support for rezoning COS_2 are noted. Proposed Variation No. 1 seeks to ensure that sufficient residential zoned lands are available to facilitate the achievement of housing growth requirements over the plan period.

Recommendation:

No change to the Proposed Variation is recommended.

2.6 Individual Submissions – Tipperary Cahir Cashel MD

Submission Number: TCC-C1-VAR1-9	Submission Name: Kay Crowe on behalf of Bernadette Kiely	Settlement: Tipperary Town
<p>Submission Summary:</p> <p>This submission requests the re-zoning of lands at Collegelands, Tipperary Town from Agricultural use to Residential use. This submission presents land at College Lands adjacent to the R664 and L42101. The lands are within the Tipperary development plan town boundary and area access via roundabout and local road access.</p>  <p>The lands were previously zoned for residential use in previous Tipperary Town Development Plan 2001. The site is serviced and is proximate to the Sacre Coeur nursing home, Sean Treacy GAA centre; the town rail station and Tipperary Golf Club. The landowner received planning permission to restore and extend the cottage on the site (ref. 2560326). The owners intention was to include additional units for housing to meet specific needs. As chair of the Board of Moorehaven centre, the owners’ plans include providing additional units on the land holding to meet local needs for intellectual disabilities. The land is available to the market for development, noting that some of the additional land proposed to be zoned for residential in Tipperary Town is not available to the market for housing.</p>		
<p>Consideration:</p>		

The contents of the submission are noted. Proposed Variation No. 1 has sought to zone sufficient residential land to cater for the housing targets for Tipperary Town to 2031 and includes 50% headroom, recognising the fact that, for a variety of reasons, a significant proportion of zoned lands may not be activated over the period of a development plan. The subject site is located on the outskirts of the town. The existing dwelling on the site is served by a septic tank and a new septic tank is proposed to be installed as part of planning permission 2560326. It is considered that the land proposed for residential zoning under this Variation is adequate to meet the future growth requirements of the town and is more appropriately located in terms of compact growth, sequential development and servicing.

Recommendation:

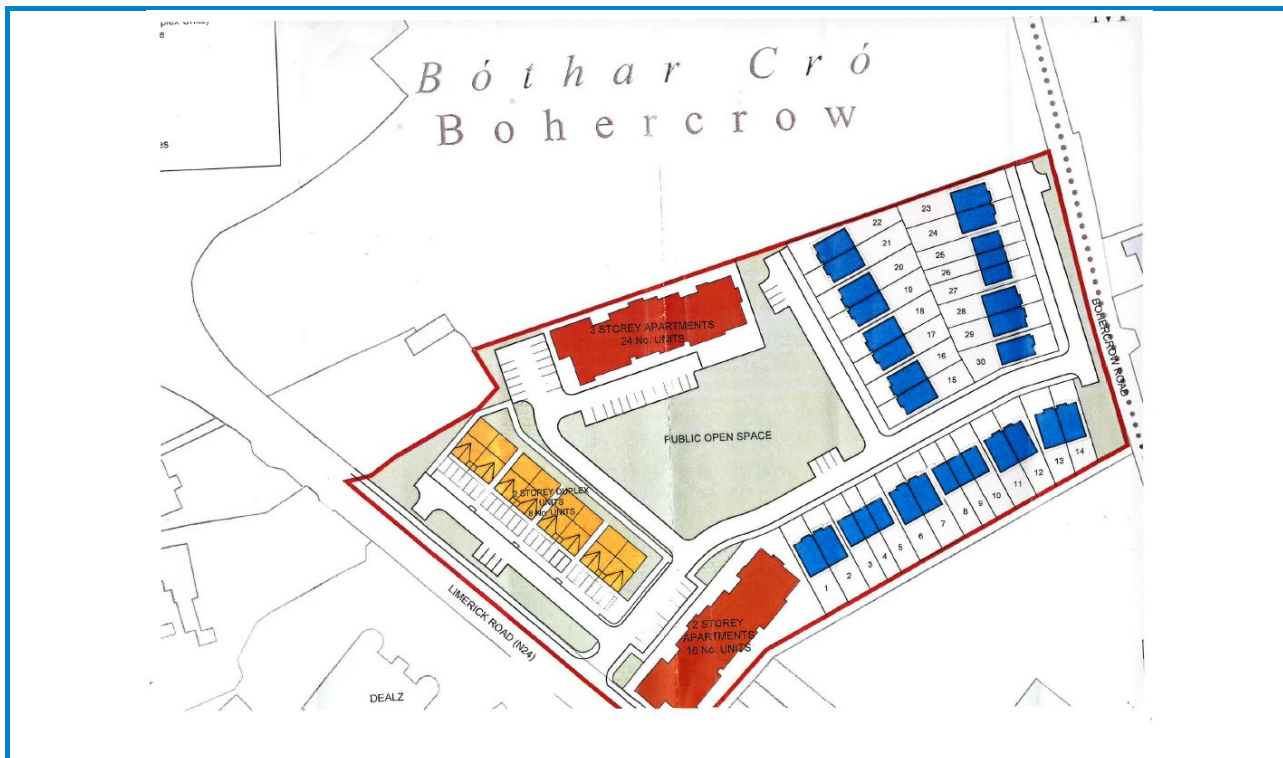
No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-13	Submission Name: Maurice Casey	Settlement: Tipperary Town
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Submission Summary:

This submission requests the re-zoning of lands at Bohercrow, Limerick Road, Tipperary Town, from Commercial use to Residential use. Mr Casey has over the last 30 years successfully delivered residential and commercial developments in Cahir. The submission includes a list of completed developments. The lands outlined in this submission are in the long term ownership of Mr. Casey and he is in position to take the site forward for development with a change in zoning. The submission includes a sketch of a housing scheme that could be delivered on the lands should the site be zoned for residential development.

The submission includes a letter from Bryan McCarthy & Associates Consulting Engineers on behalf of Mr. Casey. The letter outlines the site suitability to deliver housing in Tipperary Town noting the proximity of the site to the town centre and the availability of public transport nearby.



Consideration:

The contents of the submission are noted. The subject site is located to the northwest of the town, close to the Tipperary Town Plaza. The site is currently zoned for Employment use and has been earmarked for the future economic growth of Tipperary Town. The surrounding land uses are characterised by employment / commercial uses, and it is considered that the zoning of these lands for residential uses may conflict with and stifle employment development in this part of the town. The site is outside the 10-minute walking distance of the town centre. It is considered that there are more sequentially preferable sites within the settlement boundary to cater for future growth within the Plan period.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-19

Submission Name:

Bryan McCarthy & Associates on behalf of Maurice Casey

Settlement:

Tipperary Town

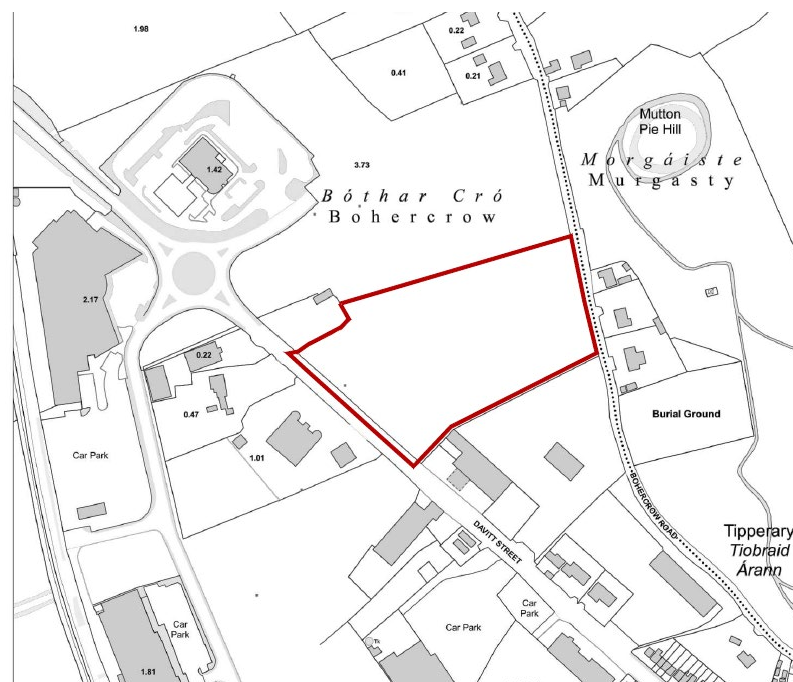
Submission Summary:

This submission is on behalf of the landowner and seeks the re-zoning of lands at Bohercrow, Limerick Road, Tipperary Town, from Commercial use to Residential use.

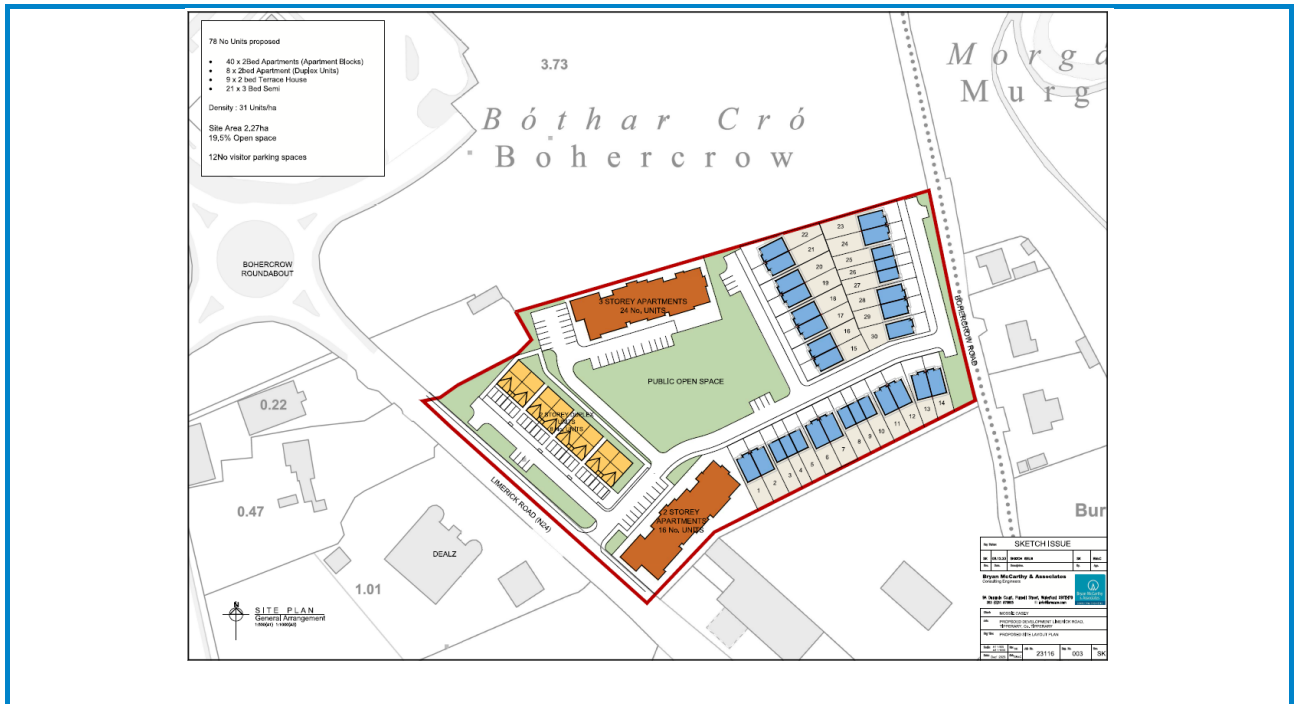
This submission outlines the site suitability to deliver housing in Tipperary Town noting the proximity of the site to the town centre and the availability of public transport nearby:

- Within town boundary
- Site is in proximity to the town centre and existing social infrastructure
- Walking distance to public transport and retail outlets, including Dunnes and Tesco
- Well served by public transport including the 855 bus route and in proximity of Limerick Junction.
- Easy access to Limerick City.

If rezoned, it is proposed to deliver a housing development which would help address the future housing deficit in the town.



The submission includes a sketch of a suggested housing development for the lands.



Consideration:

This submission has been included in the submission made by the landowner, reference number TCC-C1-VAR1-13. See the consideration for submission reference number TCC-C1-VAR1-13.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-16	Submission Name: Patrick Meagher	Settlement: Cahir
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Submission Summary:

This submission requests the re-zoning of lands/building at Convent Dormitory, Pearse Street, Cahir from the proposed zoning of ‘Community Services and Infrastructure’ to a zoning objective that permits residential use.

Mr. Meagher is the owner of the property and submits that the building comprises a former convent dormitory and has historically functioned as residential accommodation, with sleeping quarters, sanitary facilities and associated living space.

The submission states that the current zoning does not align with the actual use. Changing the zoning to residential use would align with National policy supporting compact growth, sustainable development and use of existing structures.

External and internal photographs are attached with submission.



Consideration:

The contents of the submission and attached photographs are noted. The subject site, while not in the same ownership as the convent, is part of the wider convent complex and rezoning for a conflicting use would represent an inappropriate dichotomy of uses. It is considered that there are other sites better suited for significant residential development within the settlement boundary to satisfy future growth within the development plan period and beyond.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-17	Submission Name: English Tarmac Ltd	Settlement: Tipperary Town
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Submission Summary:

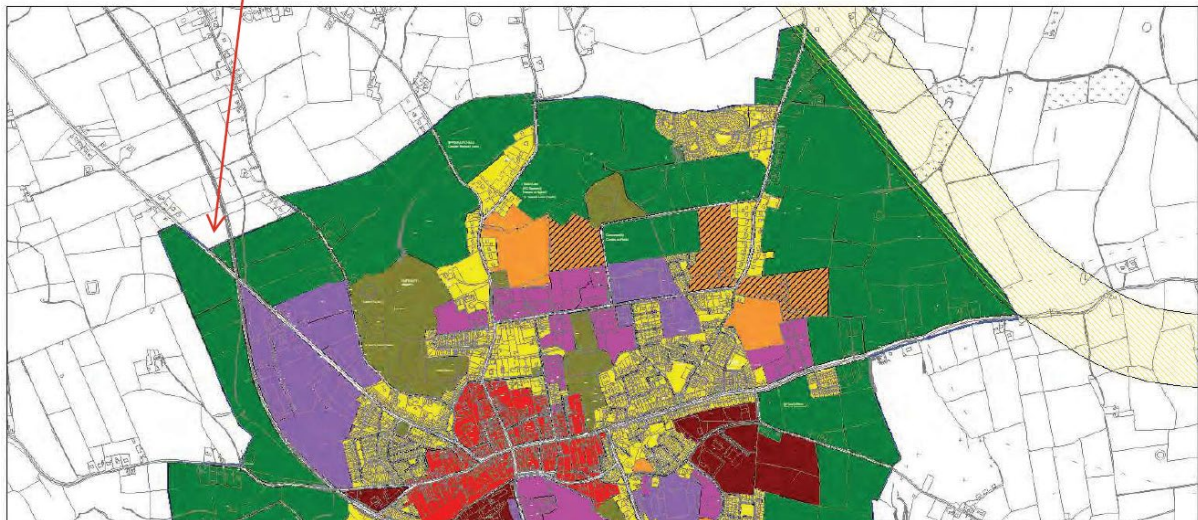
This submission seeks a change to the settlement boundary of Tipperary Town to include lands at Bohercrow, Tipperary Town and the rezoning of that land to Light Industry/ enterprise and Employment use.

The lands are adjacent to the current settlement boundary. The lands are strategically positioned on the western approach to the Town.

The submission states in support:

- Direct frontage and access to N24, proximity to Limerick Junction Railway Station
- Established pattern of employment use in the area
- Sufficient scale to accommodate a range of uses, contributing positively to economic development of Tipperary Town
- Linked by footpath, proximity of services
- Support the sustainable expansion of Tipperary Town

Location of Lands at Bohercrow, Tipperary



Consideration:

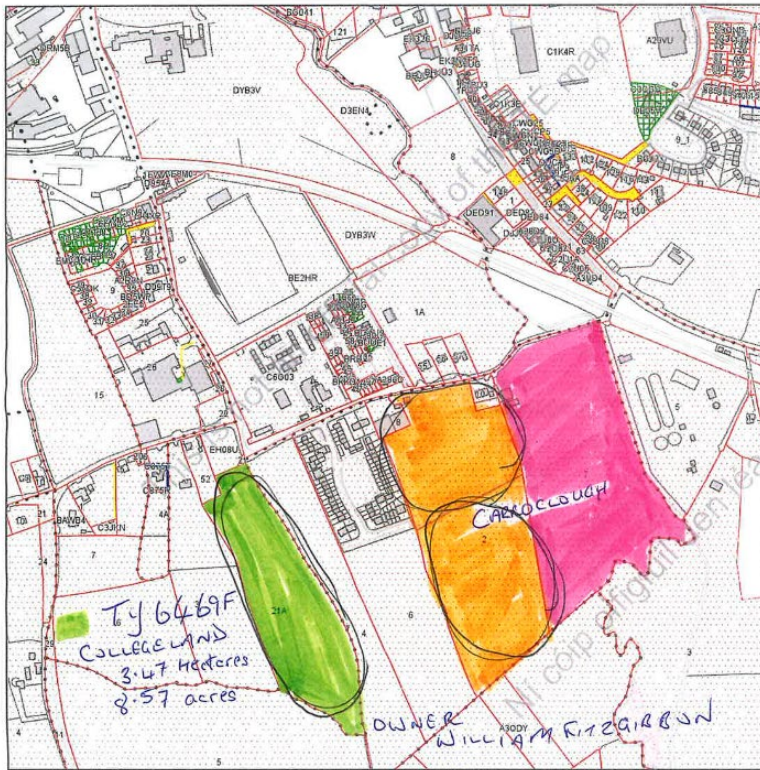
The contents of the submission are noted. The purpose of Proposed Variation No. 1 is to ensure there is sufficient residential zoned land to cater for the housing targets to 2031. The extension of the settlement boundary of Tipperary Town and the rezoning of the site for employment purposes is beyond the scope of Variation No. 1. 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 to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-24	Submission Name: William Fitzgibbon	Settlement: Tipperary Town
<p>Submission Summary:</p> <p>This submission requests the inclusion of lands at Collegelands, and Currolough Tipperary Town for development. Previously made a submission in 2025 for the Tipperary Town Plan. Understands this Variation will superceed the Tipperary Town plan.</p> <ul style="list-style-type: none"> • Lands are ideally situated in proximity to the town • Road access and access to River Arra blueway. • Sewerage, water and ESB near by. • Sporting and recreational facilities near by. • Work done on services at the lands <p>Land was previously zoned but was dezoned following the crash in 2008.</p> <p>Maps attached for lands at Collegelands and Carroclough and lands at Rathanny.</p>		



Official Tailte Eireann Registration Map

This map should be read in conjunction with the folio.

Tailte Eireann (TE) Registration mapping is based on TE Surveying mapping. Where TE Registration maps are printed at a scale that is larger than the TE Surveying scale, accuracy is limited to that of the TE Surveying map scale.

For details of the terms of use and limitations of scale, accuracy and other conditions relating to TE Registration maps, see www.tailte.ie.

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(centre-line of parcel(s) edged)

- Freehold
- Leasehold
- SubLeasehold
- 'S' Register

(see Section 8(1)(f) of Registration of Title Act 1964 and Rule 224 & 225 Land Registration Rules 1972 - 2010).

Burdens (may not all be represented on map)

- Right of Way / Wayleave
- Turbary
- Pipeline
- Well
- Pump
- Septic Tank
- Soak Pit

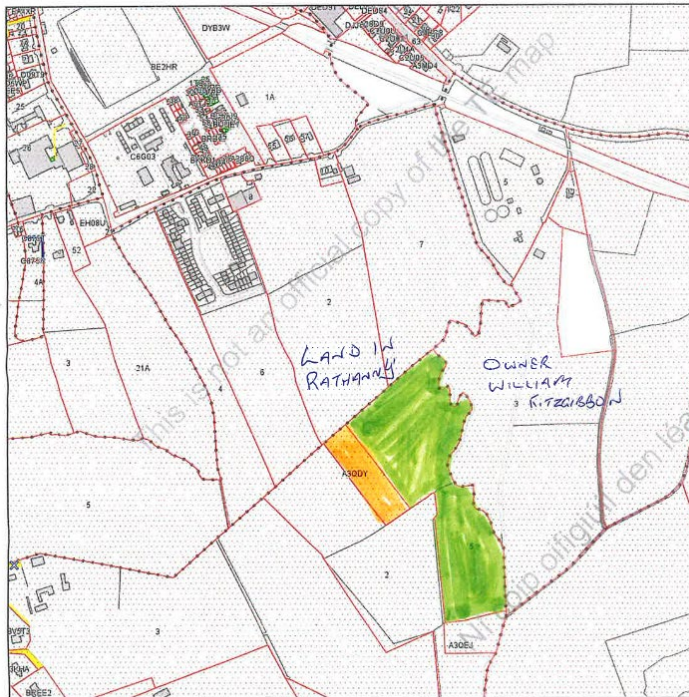
A full list of burdens and their symbology can be found at: www.landdirect.ie

Tailte Eireann Registration operates a non-conclusive boundary system. The TE Registration map identifies properties not boundaries meaning neither the description of land in a folio nor its identification by reference to a TE Registration map is conclusive as to the boundaries or extent.

(see Section 85 of the Registration of Title Act, 1964). As inserted by Section 62 of the Registration of Deed and Title Act 2006.

TY 27852 - 6.16 Hectares 15.22 acres

TY 27853 - 5.87 hectares
 Creation Date: Wednesday, April 8, 2026 10:15:04 AM



Official Tailte Eireann Registration Map

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- Right of Way / Wayleave
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(see Section 85 of the Registration of Title Act, 1964). As inserted by Section 62 of the Registration of Deed and Title Act 2006.

TY 22745 - 4.22 Hectares 10.4 acres

TY 35329F - 0.72 Hectares
 Creation Date: Wednesday, April 8, 2026 9:52:55 AM

Consideration:

The contents of the submission are noted.

The lands at Collegelands and Carroclough are currently zoned ‘Agriculture’ in the Tipperary Town Development Plan 2013. Under Variation No. 1 it is proposed to zone these lands ‘Town Environs’. This zoning objective is to provide for agricultural needs and protect and enhance the rural environment and setting of the settlement. Previous to the 2013 TDP, the 2007 Tipperary Town and Environs Development Plan had the land designated as part of a larger area with zoning objective ‘Master Plan 02’. Part of the lands at Carroclough lie within flood Zone A and B. The lands are located at the periphery of the settlement, adjacent to the settlement boundary.

The site does not represent compact growth or sequential development. It is considered that there are more appropriate landholdings within the settlement boundary that better align with the principles of sustainable development to facilitate projected growth within the development plan period.

The lands at Rathanny lie outside the settlement boundary for Tipperary Town and adequate lands are available within the settlement to meet the projected growth requirements.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-26	Tom Philips and Associates on behalf of Melclon Unlimited Company - Cashel	Cashel

The submission objects to the proposed rezoning of part of these lands from “New Residential” to “Strategic Reserve”, and instead seeks retention and reinstatement of “New Residential” zoning on existing residentially zoned lands; and rezoning of additional adjacent lands from Industrial & Employment to New Residential, in line with a comprehensive masterplan.

The site (c. 35.53 ha) is located c. 1km southeast of Cashel town centre, adjacent to existing residential development and the M8 motorway. It is part of the ‘Coopers lot Masterplan area’ as set out in the Cashel TFP 2009. It is already serviced or capable of being serviced (roads, water, foul sewer, footpaths).

A masterplan prepared by Darmody Architecture identifies potential for approximately 496 residential units, retained industrial/employment lands (c. 8.19 ha) along the M8 along with a significant amenity and open space provision.

Site	Zoning	Existing Zoning (ha.)	Proposed Zoning (ha.)	Difference
Plot 1 (Residential Lands)	New Residential (R1)	11.51 ha.	19.07 ha.	+ 7.56 ha.
Plot 2 (Industrial Lands)	Industrial and Employment (I/E)	20.57 ha.	8.19 ha.	- 12.38 ha.
Plot 3 (Adjacent to Cashel King Cormacs)	Amenity (A)	3.45 ha.	8.27 ha.	+ 4.82 ha.
Total:		35.53 ha.	35.53 ha.	N/A

The proposed Variation would effectively de-zone serviceable residential land for the lifetime of the Development Plan. This contravenes national and ministerial planning guidelines, which state that serviced residential land should not be de-zoned. It undermines the objectives of the revised National Planning Framework (NPF 2025), which requires a strong pipeline of zoned land to meet higher housing targets, and introduces unnecessary constraints and uncertainty into housing delivery.

Under revised NPF Housing Growth Requirements, Tipperary’s housing target has increased significantly from 605 units p.a. to 1,008 units p.a. representing up to 1,512 units p.a. when headroom is applied. Cashel’s housing requirement has increased from 218 homes to 491 homes (including headroom) to 2031. The submission argues that sidelining Cooper’s Lot works against these targets.

The Serviced Land Assessment (SLA) does not explain why lands in Cashel (including Cooper’s Lot) were designated Strategic Reserve and treats Cashel inconsistently compared to other towns (e.g. Clonmel). It is highlighted that a significant amount of New Residential land is now zoned as Strategic Reserve including that in Coopers Lot. The Council proposes piecemeal rezoning of small sites elsewhere in Cashel (e.g. C_5, C_6 & C_7) while restraining large, comprehensive, serviced lands. This approach is in opposition to sequential development principles, it encourages leapfrogging of development, and reduces the effectiveness and certainty of housing delivery.

Uisce Éireann Confirmation of Feasibility (Dec 2025) confirms that water and wastewater connections are feasible, subject to upgrades and necessary infrastructure works can be delivered as part of development. The site has road access, footpaths, lighting, and is proximate to services. It is suitable for Tier 2 “Serviceable Land”, not Strategic Reserve.

It is requested that the Strategic Reserve zoning is amended and that the land is rezoned in accordance with the submitted masterplan. A masterplan document with schematic design has also been included with the submission.

The Zoning we seek as part of this Submission:



Proposed Zoning under the Proposed Variation No. 1 of the Development Plan:

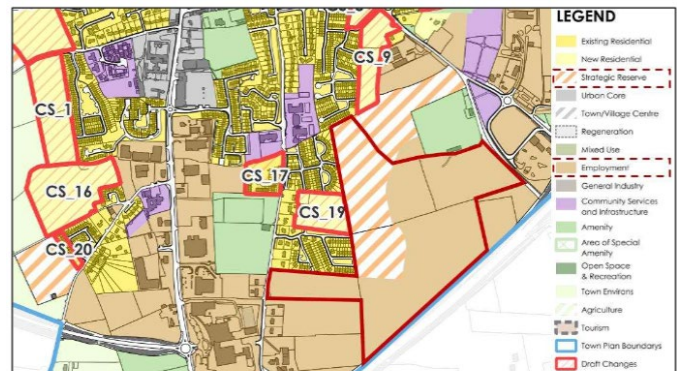
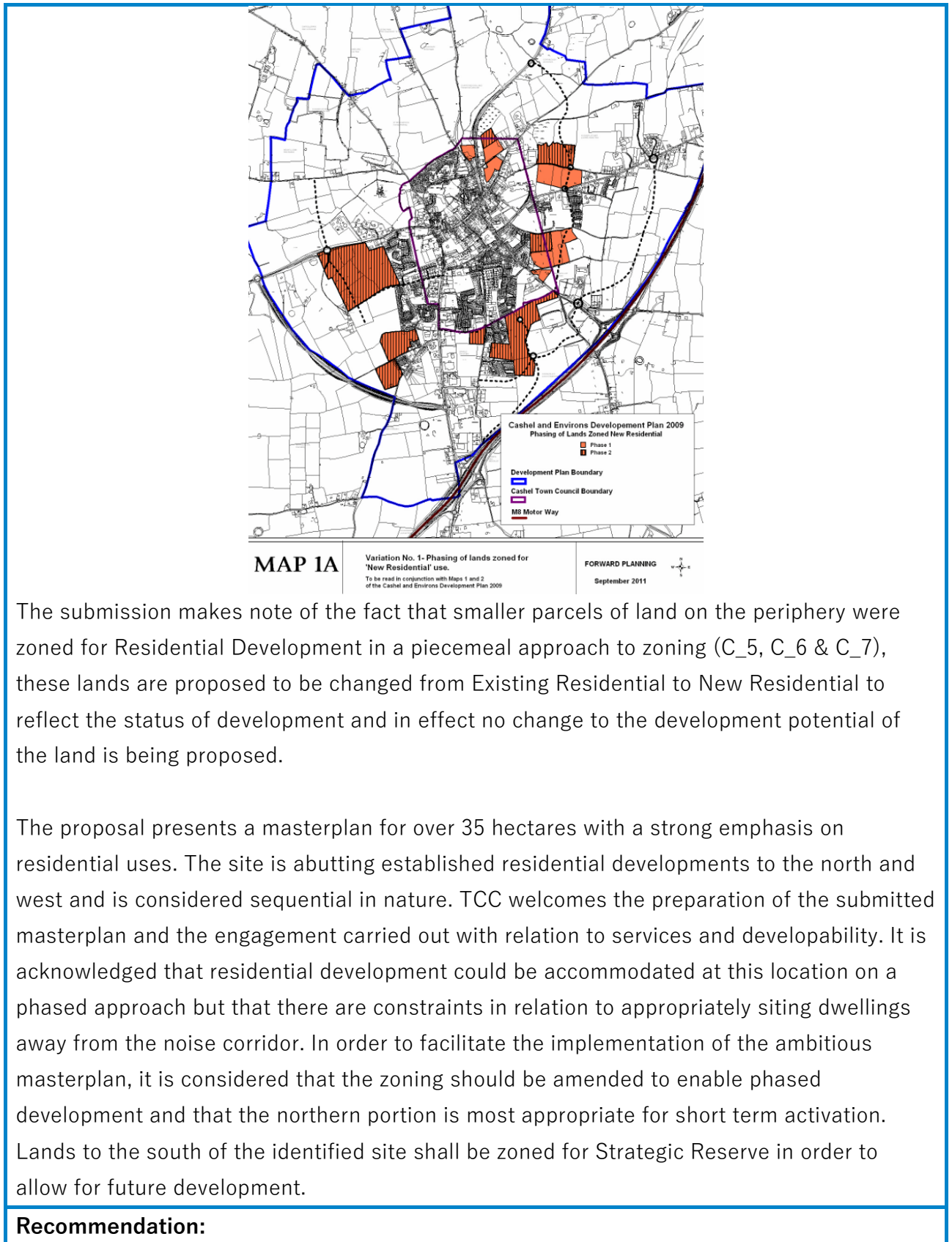


Figure 2.8: Extract of Land Use Zoning Map - proposed Variation No. 1 of the *Tipperary County Development Plan 2022 – 2028*, with Subject Lands Boundary Outlined in Red. (Source: Tipperary County Council, cropped and annotated by TPA, 2026.)

Consideration:

The proposal relates to a large bank of land to the south of Cashel town which is currently zoned as, Phase 2 Residential, Open Space and Recreation, and Employment.

While the submission argues that a portion of the land in question has been effectively de-zoned due to its amendment from New Residential to Strategic Reserve, the lands were in fact zoned for Phase 2 Residential Development under the current plan (Cashel & Environs Development Plan 2009 (as Varied) and so in effect were already Strategic Reserve.



The submission makes note of the fact that smaller parcels of land on the periphery were zoned for Residential Development in a piecemeal approach to zoning (C_5, C_6 & C_7), these lands are proposed to be changed from Existing Residential to New Residential to reflect the status of development and in effect no change to the development potential of the land is being proposed.

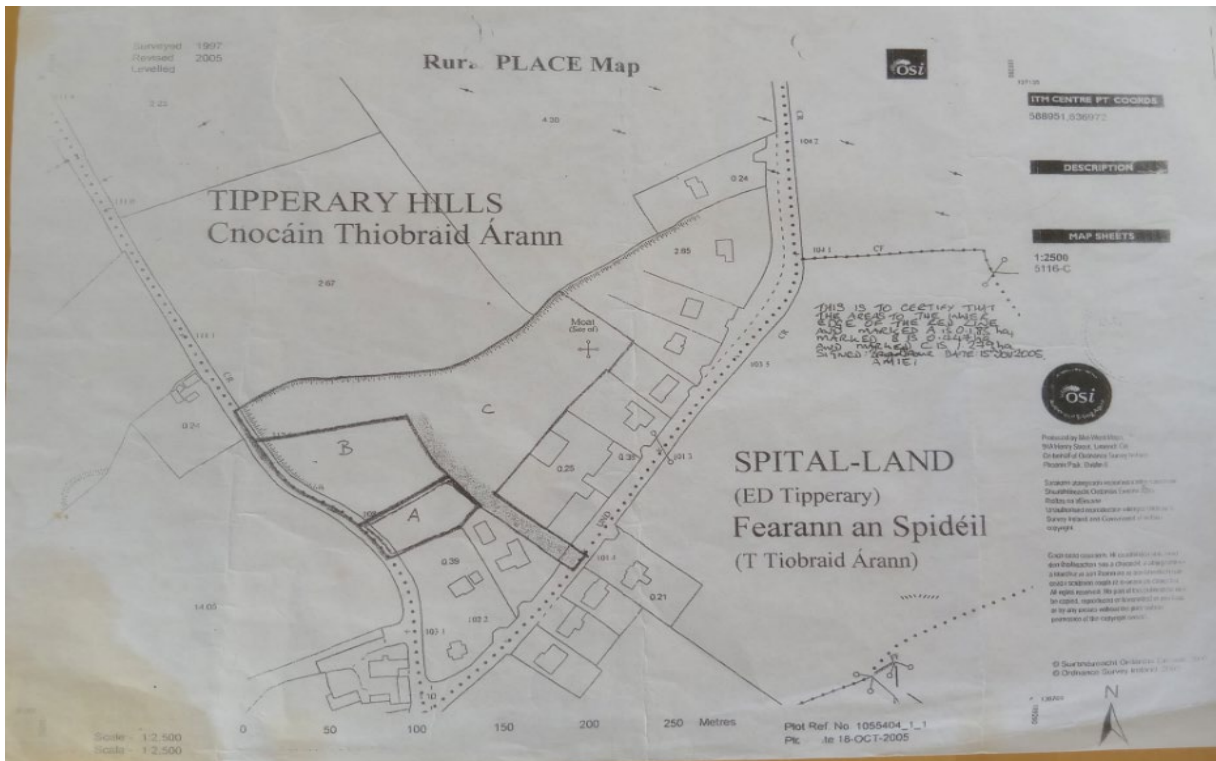
The proposal presents a masterplan for over 35 hectares with a strong emphasis on residential uses. The site is abutting established residential developments to the north and west and is considered sequential in nature. TCC welcomes the preparation of the submitted masterplan and the engagement carried out with relation to services and developability. It is acknowledged that residential development could be accommodated at this location on a phased approach but that there are constraints in relation to appropriately siting dwellings away from the noise corridor. In order to facilitate the implementation of the ambitious masterplan, it is considered that the zoning should be amended to enable phased development and that the northern portion is most appropriate for short term activation. Lands to the south of the identified site shall be zoned for Strategic Reserve in order to allow for future development.

Recommendation:

- Rezone northern section to New Residential and Open Space and Recreation and southern section to Strategic Reserve. Retain Employment zoning to south and east. (See Amendment 12 and 32 in Part 2)

Submission Number: TCC-C1-VAR1-38	Submission Name: Louise Ryan	Settlement: Tipperary Town
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Submission Summary:
 This submission seeks the rezoning of part of a site at Tipperary Hills, Tipperary, from its current “Agricultural” zoning to “New Residential”. A small portion of the same site is already zoned residential.



Consideration:
 The content of the submission is noted. The site is on the periphery of the town, characterised by low density housing. The site does not represent compact growth or sequential development. It is considered that the land proposed for residential zoning under this Variation is adequate to meet the future growth requirements of the town and is more appropriately located in terms of compact growth, sequential development and servicing.

Recommendation:
 No change recommended.

Submission Number: TCC-C1-VAR1-45	Submission Name: Thomas Meagher	Settlement: Cahir
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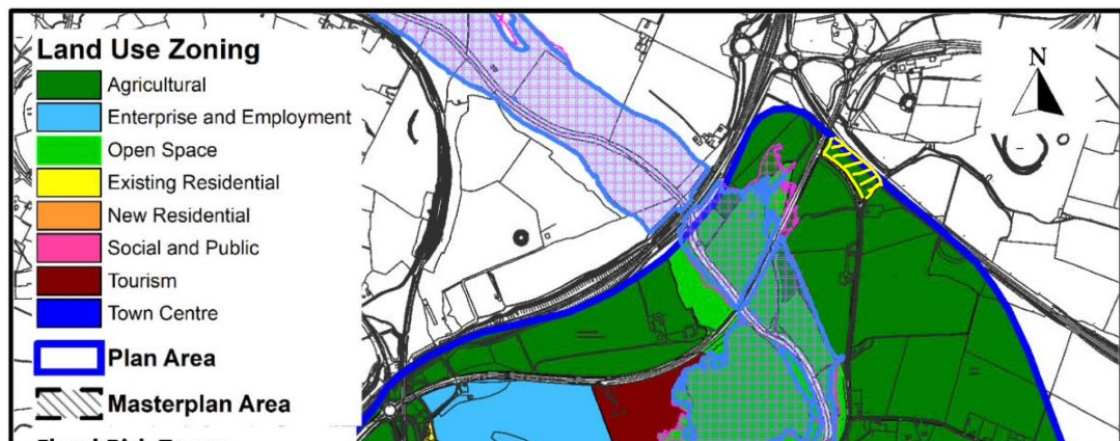
Submission Summary:

The submission is made by the landowner, requesting that lands currently zoned 'Agriculture' would be rezoned to the previous zoning: Enterprise & Employment.

Factors listed in support of this request:

- Lands are strategically located junction of R670 and N24, ease of access to national road network: potential for logistics, light industries, employment
- Close to other areas zoned for Enterprise & Employment
- Potential to contribute to economic development of Cahir
- Previously designated for Enterprise and Employment.
- Flood risk can be assessed and appropriate mitigation implemented

Cahir Local Area Plan 2021-2027



Consideration:

The contents of the submission are noted.

The purpose of Proposed Variation No. 1 is to ensure there is sufficient residential zoned land to cater for the housing targets to 2031. The rezoning of the site for employment purposes is beyond the scope of Variation No. 1. The respondent will have an opportunity to request this zoning change as part of the review of the Tipperary County Development Plan.

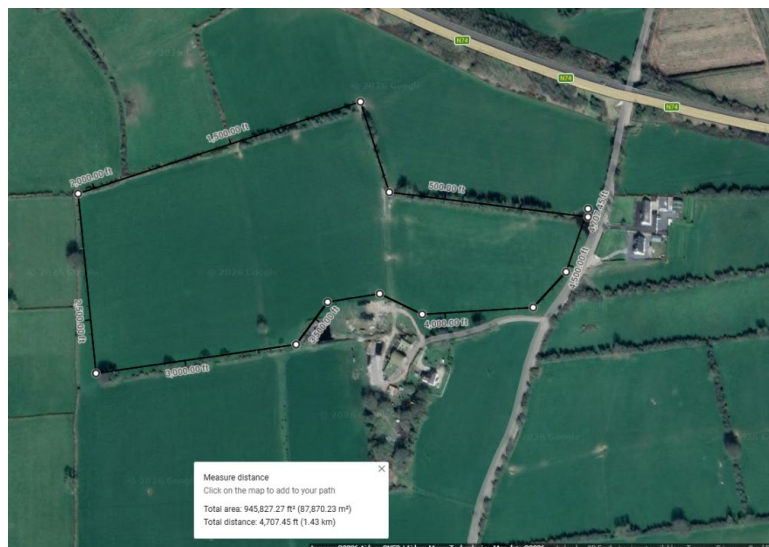
Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-47	Submission Name: Michael Crosse	Settlement: Cashel
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Submission Summary:

Request to extend the settlement boundary to encompass lands adjacent to Windmill House (E25X271). The lands are in walking distance of amenities and represent a logical and sequential extension of Cashel town.



Consideration:

The land is located outside the settlement boundary. It is considered that there is sufficient land within the existing boundary to facilitate future development and that no extension to the boundary is required to accommodate such.

Recommendation:

No change to the Proposed Variation is recommended.

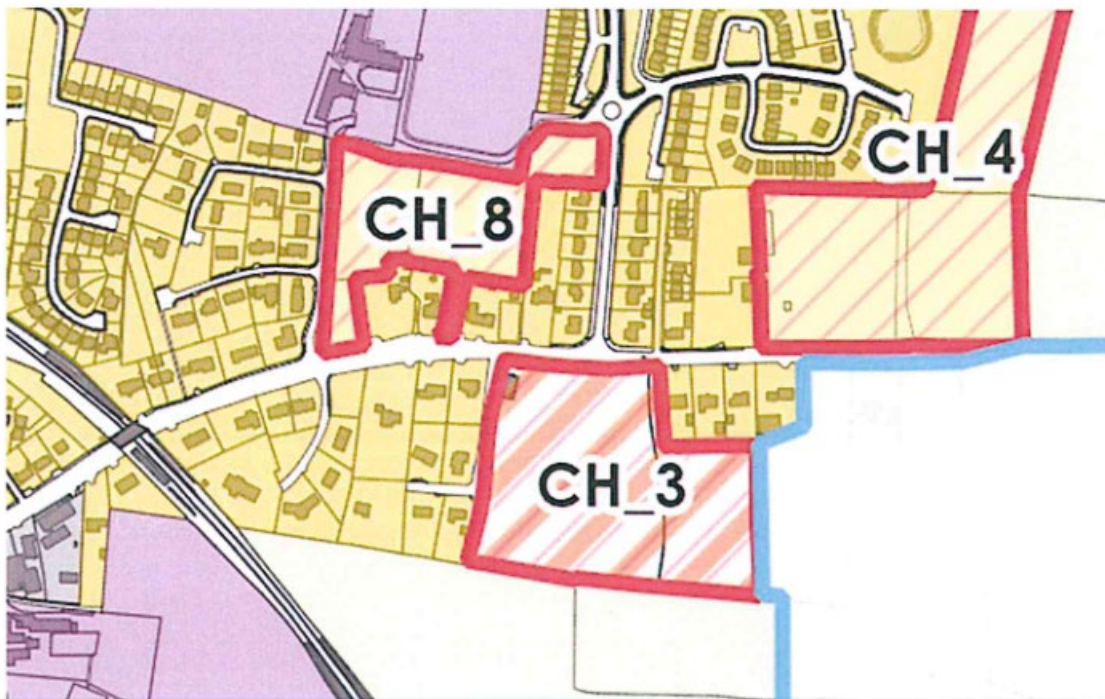
Submission Number: TCC-C1-VAR1-56	Submission Name: Michael Keating on behalf of Ronan Walsh	Settlement: Cahir
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Submission Summary:

The submission is made on behalf of the landowner, requesting that a portion of the lands at the Clonmel Road, Cahir, currently proposed to be zoned ‘Strategic Reserve’ would be considered for ‘New Residential’ zoning. This is to allow a portion of the land (identified as CH_3 in the variation) to be capable of development.

Factors in support of this request:

- Lands are located L31238, investment pending under Community Involvement Scheme 2026/27.
- Access to sewerage and water network
- Close to amenities
- Local demand – landowner has had enquiries
- Suitable for serviced sites or small scheme, low medium density
- As suitable as other lands proposed for ‘New Residential’
- Other lands zoned New Residential unlikely to come forward
- Strategic Reserve Zoning would exclude housing development for the foreseeable future



Mr. Walsh requests that a portion of the land - similar to that indicated below - be Zoned 'New Residential' to allow a portion of his land to be automatically capable of development under the current County Development Plan.



Consideration:

The contents of the submission are noted. The lands are located within the settlement boundary of Cahir. The lands are zoned Agriculture under the Cahir LAP 2022-2028 and Variation No. 1 proposes a change to 'Strategic Reserve'.

Proposed Variation No. 1 seeks to ensure that sufficient residential zoned lands are available to facilitate the achievement of housing growth requirements over the plan period. Under the proposed land zoning 'Strategic Reserve' it is possible in certain circumstances for the land to come forward during the plan period, however, in order for this land to become readily activated a New Residential zoning would be more appropriate. It is considered that zoning only the portion of land outlined in the submission would restrict the development potential to the overall site which has capacity to deliver a considerable development. It is therefore considered that CH_3 should be rezoned entirely for New Residential purposes.

Recommendation:

Rezone CH_3 as New Residential. (see Amendment 14 and 33 in Part 2)

Submission Number: TCC-C1-VAR1-58	Submission Name: Michael Keating	Settlement: Cahir
Submission Summary:		

The submission requests that established housing development, at Riverpark, Ardfinnan Rd, Cahir, is zoned for residential use.

Rationale in support of this request:

- Original planning permission granted 30/09/1981 was for low density housing
- 'town environs' zoning has restrictions on who can gain planning permission
- Primary use of this land is not agriculture
- Sites are clearly intended for residential use
- Any zoning other than residential is inappropriate
- Any planning application on these sites would be rigorously assessed by Planning Authority

Further requests the local authority to examine all existing houses along public roads to be zoned existing residential rather than town environs or agriculture zoning.



Consideration:

The contents of the submission are noted. The lands are located within the settlement boundary of Cahir and are located on the Ardfinnan Road R670. Currently, under the Cahir

Local Area Plan 2021-2027, the lands are zoned ‘Agricultural’. Variation No. 1 proposes a change of zoning to ‘Town Environs’.

The lands lie outside the built up urban area of the town and are rural in nature:

- there is not a continuous footpath connection to the town centre,
- there is no street lighting on the stretch of R670 road at the access to the lands,
- the speed limit at the entry is 80kph,

The approach taken for zoning this land parcel is based on the principles of compact growth and sequential development. The existing dwellings are in a peripheral location and are considered as one-off housing in the town environs. Residential development on these lands can be considered in line with the policy for one-off housing in the environs.

Recommendation:

No change to the Proposed Variation is recommended.

<p>Submission Number: TCC-C1-VAR1-59</p>	<p>Submission Name: Michael Keating</p>	<p>Settlement: Cahir</p>
<p>Submission Summary:</p> <p>The submission requests that established housing development, at Garden Grove, Ardfinnan Rd, Cahir, is zoned for residential use.</p> <p>Rationale in support of this request:</p> <ul style="list-style-type: none"> • Well established residential development • Extensive planning history on the site, in total planning permission granted for 7 dwellings • ‘Town Environs’ zoning has restrictions on who can be granted planning permission • Primary use of this land is not agriculture and could not be farmed • Sites are clearly intended for residential development • Any zoning other than residential is inappropriate • Would not result in haphazard development • Any planning application on these sites would be rigorously assessed by Planning Authority 		

Further requests the local authority to examine all existing houses along public roads to be zoned existing residential rather than town environs or agriculture zoning.



Consideration:

The contents of the submission are noted. The lands are located within the settlement boundary of Cahir and are located on the Ardfinnan Road R670.

Currently, under the Cahir Local Area Plan 2021-2027, the lands are zoned ‘Agricultural’. Variation No. 1 proposes a change of zoning to ‘Town Environs’.

This policy approach is based on the principles of compact growth and sequential development.

Proposed Variation No. 1 seeks to ensure that sufficient residential zoned lands are available to facilitate the achievement of housing growth requirements over the plan period. The scope of the variation is to zone land for largescale residential development in order to facilitate future growth at scale.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-60

Submission Name:

Michael T. Halley

Settlement:

Clogheen

Submission Summary:

The submission raises concerns with the proposed zoning of CG_1 at Cockpit Lane in Clogheen for New residential development. Submits that the location is totally unsuitable for new residential until the dangerous junction with main street is addressed.

Consideration:

The contents of the submission are noted. The site CG_1 measures 0.7 hectares and would be expected to deliver a small housing scheme. The traffic impact and road safety concerns from any proposed scheme would be fully assessed during the normal planning process. The site is ideally positioned in terms of proximity to the village centre and to the services available in the village, including public transport. The lands present an opportunity for compact urban growth, consolidating development in the village core and could accommodate a modest housing development. It is also noted that there are limited alternative opportunities for new residential zoning within the settlement.

Proposed Variation No. 1 seeks to ensure that sufficient residential zoned lands are available to facilitate the achievement of housing growth requirements over the plan period.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-62

Submission Name:

Catherine McCraith

Settlement:

Clogheen

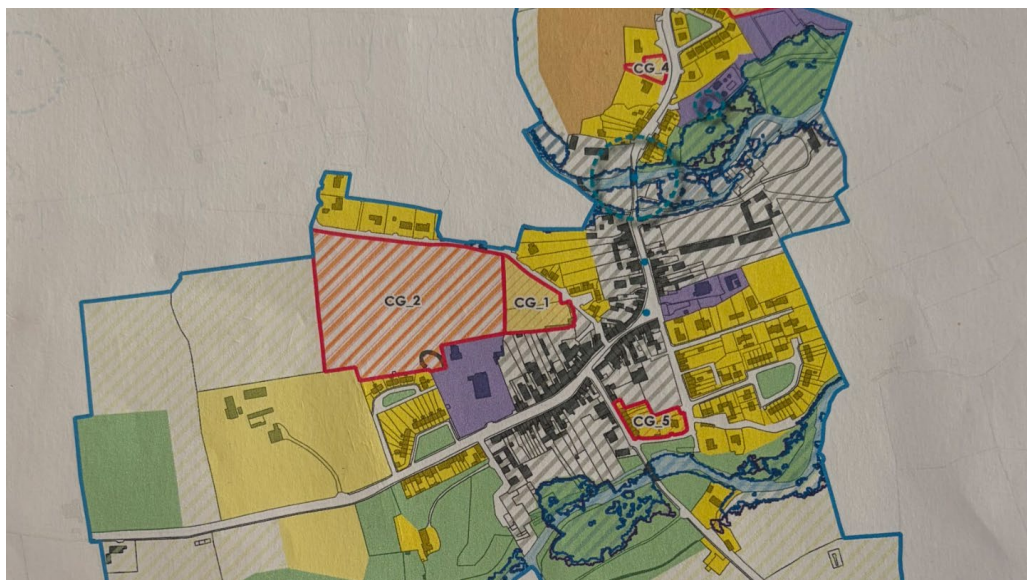
Submission Summary:

The submission is from the landowner and requests that land marked CG_1 be considered for strategic reserve and not zoned 'New Residential' at this time.

In support of request, the submission notes:

- Land is in active agricultural use, under long term lease

- One access point located on cul-de-sac, very narrow lane which is very busy, often with traffic to GAA pitch. Also a community garden on the laneway
- Alternative access would have to be sought for residential development.
- Would potentially bring RZLT liability with severe financial implications



Consideration:

The contents of the submission are noted. The site CG_1 measures 0.7 hectares and would be expected to deliver a small housing scheme. The traffic impact from any proposed scheme would be assessed during the normal planning process. The site is ideally positioned in terms of proximity to the village centre and to the services available in the village, including public transport.

The lands present an opportunity for compact urban growth and consolidating development in the village core and increase the number of sites within the settlement available for residential development. The purpose of Proposed Variation No. 1 is to ensure that there is sufficient residential zoned land in the County to facilitate the achievement of housing growth requirements over the period of the Tipperary County Development Plan 2022-2028 and beyond.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-67	Submission Name: Marie Murphy	Settlement: Clogheen
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Submission Summary:

The submission relates to the proposed changes in Clogheen Village. The submission welcomes proposals for new residential development and notes the following in relation to specific sites:

CG_1 and CG_2

The cul-de-sac that provides access to these sites is narrow and not suitable, cannot take additional traffic, busy with traffic from GAA grounds and houses on laneway and must be accessed through junction to main street. Suggests that TCC would make provision for alternative access to these lands and consider going through council owned land on the Ballyporeen Road.

CG_3

Request that this proposed land rezoning is removed. Parsons Green entrance is tree lined, with meadows and greatly adds to the setting/amenity of the open farm. Risk of impact on local business/employment if housing permitted.

CG_4

Not suitable for new residential zoning as believe it provides a percolation area for one of the neighbouring properties.

CG_5

This site is composed of multiple ownerships – approximately 9 different households. Should be redesignated.

RZLT

There could potentially be serious implications for land that is rezoned for residential. CG_1 and CG_2 should not be liable for the tax until suitable entrance /egress is provided.

Consideration:

The contents of the submission are noted.

The site CG_1 measures 0.7 hectares and would be expected to deliver a small housing scheme. The traffic impact from any proposed scheme would be assessed during the normal

planning process. The site is ideally positioned in terms of proximity to the village centre and to the services available in the village, including public transport. The lands present an opportunity for compact urban growth and consolidating development in the village core.

CG_3 – The site CG_3 measures 0.47 hectares. The site has mature trees along the northern boundary which would limit the developable area and reduce any potential contribution to achieving housing growth in the settlement. The lands under current use contribute to the economic activity of the village, and it is agreed that the even limited development could threaten the economic use of the adjoining lands.

CG_4 Information is noted.

CG_5. Variation No. 1 proposes that this area is changed from ‘New Residential’ to ‘Existing Residential’ to reflect that it is composed of multiple gardens of separate dwellings.

Recommendation:

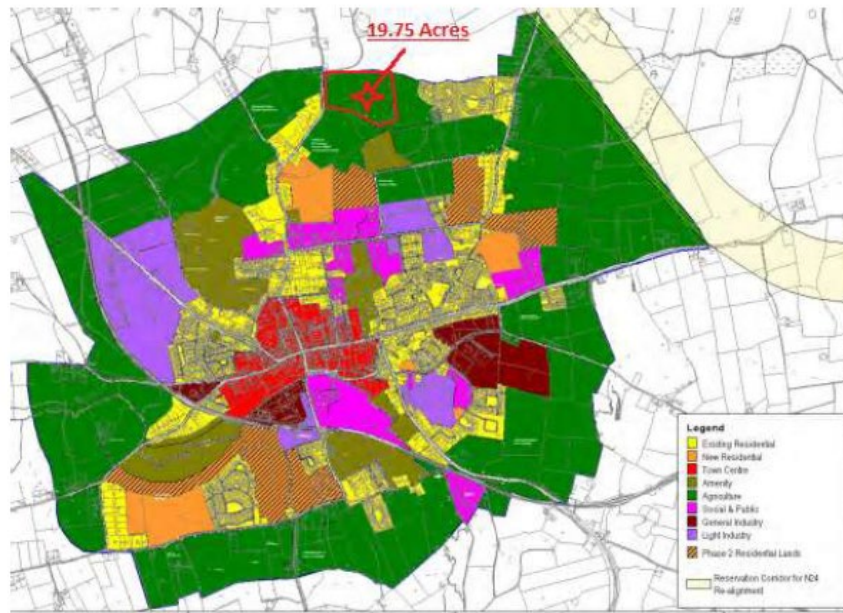
- No change to the Proposed Variation is recommended for lands reference CG_1, CG_2 and CG_5
- It is recommended that the zoning of the lands CG_3 be changed to ‘Amenity’ (see Amendment 22 and 37 in Part 2)
- It is recommended that the zoning of the lands CG_4 retain its current zoning as ‘Existing Residential’ under the TCDP 2022-2028. (see Amendment 24 and 37 in Part 2).

Submission Number: TCC-C1-VAR1-69	Submission Name: Patrick O’Dwyer	Settlement: Tipperary Town
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Submission Summary:

It is requested that the landowner’s site of c. 19.75 ha at Carrownreddy, Kingswell, Co. Tipperary, is rezoned from Agriculture to New Residential. The land is accessed from the Donohill Road and is within the town boundary. It is presently zoned for Agriculture but was previously zoned for Phase 2 Residential Lands in the 2007 Tipperary town and Environs Plan. This designation indicates that the land was considered suitable for residential development. The landowners have a strong interest and genuine intention in delivering high-quality, sustainable housing on the site. The approach would align closely with national and local policy objectives around sustainability, energy performance, and modern methods of construction.

Please see the 19.75 acres of land I am referring to highlighted on the below map for your convenience.



Consideration:

The proposed site is located approximately 1.5 km from the town centre on the R497. There is a watermain adjacent to the site but no information has been provided on the potential for wastewater and surface water management. The site does not represent compact growth or sequential development and if zoned and developed would represent a leapfrogging of other more suitable sites. It is considered that there are more appropriate landholdings within the settlement boundary that better align with the principles of sustainable development to facilitate projected growth within the development plan period.

The lands are also within the preferred road corridor for the N24 Oola to Cahir project.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-72

Submission Name:

Miriam Halley

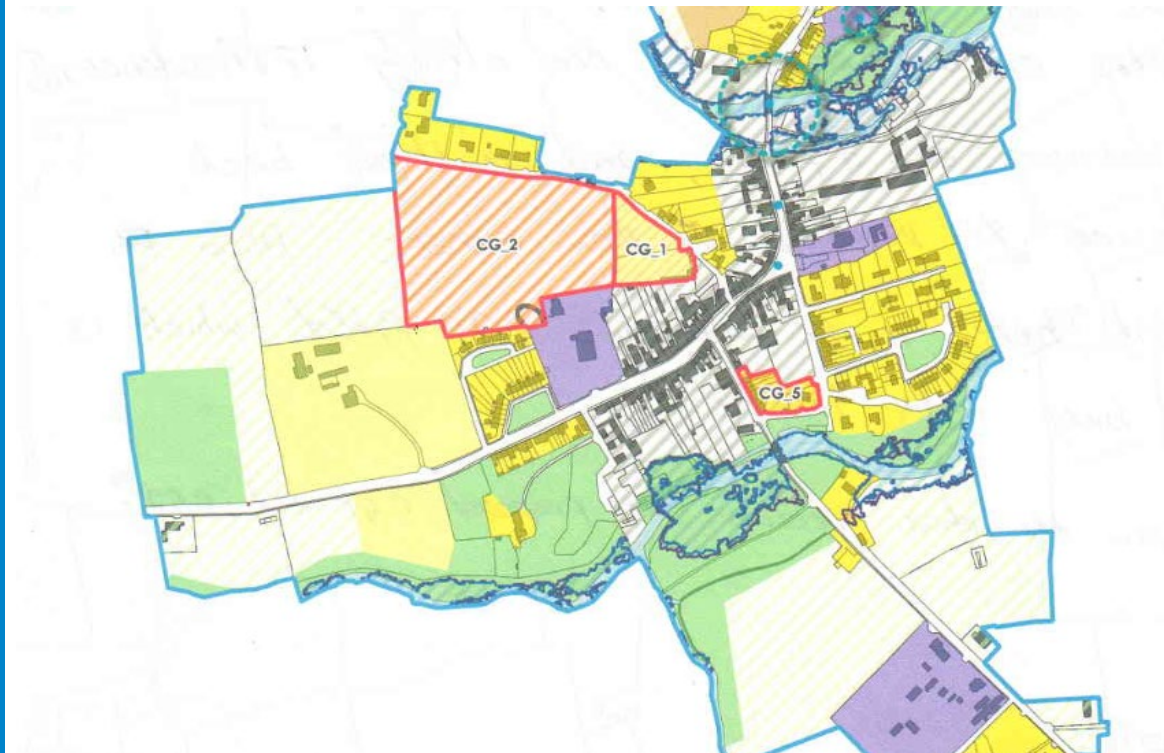
Settlement:

Clogheen

Submission Summary:

The submission relates to the sites CG_1 and CG_2 in Clogheen that are proposed to be rezoned in the variation. The submission notes that the proposed rezoning is unsuitable for the reasons:

- Land accessed by a cul-de-sac with only entrance is a narrow junction on to main street.
- Very narrow laneway,
- There are 19 residences on the road
- Four farm entrances and multiple back entrances to residences on main street.
- Fr. Sheehy's GAA park is located on the road and contributes hugely to traffic on the road.



Consideration:

The contents of the submission are noted. The site CG_1 measures 0.7 hectares and would be expected to deliver a small housing scheme. The traffic impact from any proposed scheme would be assessed during the normal planning process. The site is ideally positioned in terms of proximity to the village centre and to the services available in the village, including public transport. The lands present an opportunity for compact urban growth and consolidating development in the village core.

CG_2 is proposed for Strategic Reserve. While the primary purpose of Strategic Reserve zoning is to safeguard land for housing under future Development Plan periods, Proposed Variation No. 1 also proposes a new policy for land zoned Strategic Reserve, allowing it to be released for residential development under certain circumstances to ensure that the delivery of housing, to comply with housing targets set at national level, is not delayed or restricted.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-73

Submission Name:

Patrick J Noonan

Settlement:

Clogheen

Submission Summary:

The submission from the business operator/owner relates to the site CG_3 in Clogheen that is proposed to be rezoned New Residential in the variation. The submission requests that the proposal is removed from the variation.

- CG_3 lies adjacent to the tree lined avenue that is the entrance to the open farm and caravan/camping park.
- CG_3 is in use as a pasture for animals in the park.
- Previously the developers of the ‘Paddocks’ residential development were advised to leave a decent space between the residential development and the avenue.
- To build houses in this limited space would not be suitable and may endanger our business, which would then also endanger local employment.

Consideration:

The contents of the submission are noted. The site CG_3 measures 0.47 hectares.

The site has mature trees all the way along the northern boundary, which would limit the developable area and reduce any potential contribution to achieving housing growth in the settlement. The current use of the land in connection with the open farm and caravan/camping ground contribute to the economic and social activity of the village.

Recommendation:

It is recommended that the zoning of the lands CG_3 be changed to ‘Amenity’ (see Amendment 22 and 37 in Part 2)

Submission Number:

TCC-C1-VAR1-74

Submission Name:

Joseph Finn

Settlement:

Cashel

Submission Summary:

We would like to ask that the land shown in the map attached, is not zoned for residential development. We would suggest that the land is put in for strategic reserve instead. As

pointed out by an engineer and a developer, the site is not easily accessed and there are many better sites in Cashel, which will be developed on, before this site.



Consideration:

The site reference CS_16 is accessed from Windmill Close and from the New Residential site from the north. While the access from Spafield has undergone recent upgrades it could benefit from further intervention. Access from the north will not be activated until such time as CS_1 is developed.

Recommendation:

Amend zoning from New Residential to Strategic Reserve. (see Amendment 13 and 32 in Part 2)

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-75	Hughes Planning and Development Consultants on behalf of Monaghan Mushrooms	Tipperary Town

Submission Summary:

Request to rezone Monahan Mushroom site from Employment to New Residential. The subject lands extend to approximately 4.52 hectares and comprise an existing warehouse and ancillary structures. The site is described as brownfield and underutilised, with limited ongoing employment value. It is located to the south-east of Tipperary Town, approximately 500 metres from the town centre and 700 metres from Tipperary Railway Station, with direct access to existing road infrastructure and proximity to bus and rail services linking to Limerick, Waterford, Clonmel and Cahir. Monaghan Mushrooms are part owners of the site.

The submission emphasises that the lands are contiguous with the existing built-up area, adjoining established residential development, schools and community facilities, and are already served—or can readily be served—by key physical and social infrastructure. On this basis, the site is considered capable of early activation and delivery at pace.

Rezoning the site would support several key objectives of the NPF, including compact growth, sequential development, and transport-oriented development. Tipperary Town is one of the faster-growing settlements in the county and is strategically located within the Southern Region, benefiting from national and regional transport connections. Failure to zone additional centrally located land risks constraining housing supply and undermining growth objectives.

The subject lands meet the criteria for prioritisation under this policy framework, given their brownfield nature, accessibility, and infrastructural readiness.

Fairgreen Ingredients Warehouse site represents a logical, policy-compliant and sustainable residential zoning opportunity. It requests the lands are included within Proposed Variation No. 1 as New Residential zoning.

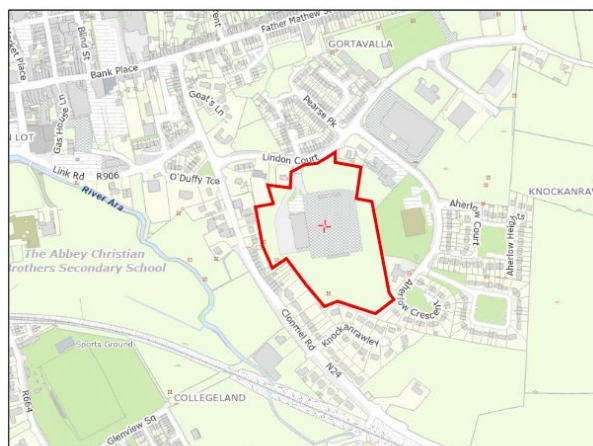


Figure 6.0 Extract of an OS Map, showing the subject lands in red outline.

Consideration:

The site is currently zoned for employment uses but is abutted by residential uses to the north and south and to Community Services and Infrastructure (resource centre) to the east. The site is located c. 600m from the town centre and is connected by footpaths. While the wastewater capacity in the town is currently restricted, the site is located proximate to water and wastewater infrastructure. Currently, residential development in the town is concentrated primarily to the north of the N74, this site would represent a balanced, sequential and compact approach to residential development in the town.

Recommendation:

Rezone from Employment to New Residential. (see Amendment 11 and 31 in Part 2)

Submission Number: TCC-C1-VAR1-76	Submission Name: Marie Murphy	Settlement: Cahir
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Submission Summary:

The appropriate zoning for the area edged in RED on the attached Map is clearly “Existing Residential” and that the current designation of Agricultural is incorrect. It is requested to change the designation to Existing Residential.



Consideration:

The site is located on the R670 within the 50kph speed zone. A footpath extends from the site to the town centre which is walkable in less than 10 minutes. The area is characterised by a collection of low-density one-off housing. The scope of the variation is to zone land for largescale residential development in order to facilitate future growth at scale. It is not the intention of the Proposed Variation to zone land for one-off housing.

Recommendation:

No change to the Proposed Variation is recommended.

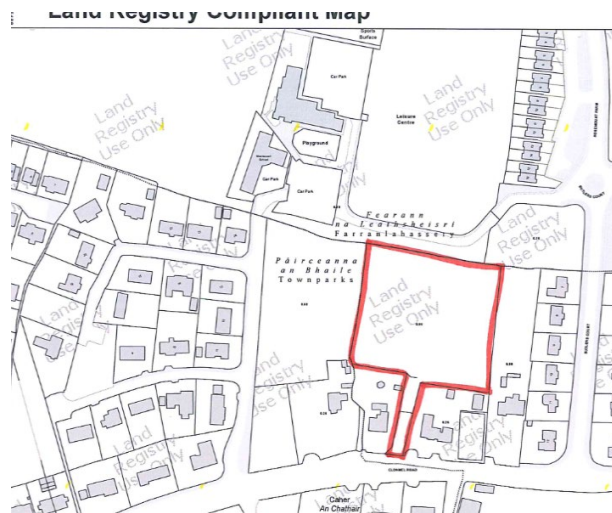
Submission Number: TCC-C1-VAR1-77	Submission Name: Michael Keating	Settlement: Cahir
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Submission Summary:

Request that CH_8 is changed to Strategic Reserve. The land has been in the landowner’s family for over 110 years and there is no intention to develop it in the foreseeable future. The imposition of RZLT is onerous considering there is no intention to develop. There is ample other land in the town available for development.

Consideration:

The existing zoning on CH_8 is Existing Residential, the proposed Variation seeks to amend to New Residential to reflect the development status of the land. In effect there is no proposed change to the development brief or potential of the land. The land is fully serviced, is proximate to the town centre and is considered to be Tier 1 development land. The purpose of the RZLT is also to stimulate development of underutilised sites, rather than protect property interests.



Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:

TCC-C1-VAR1-84

Submission Name:

Michael Keating

Settlement:

Cahir

Submission Summary:

Request that zoning on site (below) is amended to Strategic Reserve. There is no intention to develop the land in the foreseeable future. The imposition of RZLT is onerous considering there is no intention to dispose or develop the land. There is ample other land in the town available for development.



Consideration:

The site is currently zoned for Existing Residential development. The western portion of the site has recently been developed with a dwelling by a member of the landowner’s family. The existing zoning determination is considered appropriate in the context of the surrounding pattern of low-density housing.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number: TCC-C1-VAR1-87	Submission Name: Lumi Homes	Settlement: Tipperary Town
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Submission Summary:

This submission seeks the rezoning of lands at Loughaleen House, located on the northern approach to Tipperary Town, for residential development. The lands are situated between the Murgasty Road (R497) and Springfield Road, approximately one kilometre from the town centre, and extend to approximately 1.9 hectares.

At present, the lands are located within the Town Environs but remain unzoned under the current development plan. The site comprises an existing dwelling (Loughaleen House) and a number of derelict or redundant outbuildings. Notably, planning permission was previously granted on the site for a nursing home, a factor which demonstrates that the lands are considered serviceable and accessible, and capable of accommodating development.

The submission draws attention to recent demographic and housing trends. Census 2022 data indicates that the population of Tipperary Town increased by approximately eight per cent between 2016 and 2022. The submission also highlights evidence from the Property Price Register for the period 2024 to early 2026, which shows a relatively low volume of residential transactions in the town. This is interpreted as an indicator of constrained supply rather than weak demand, reinforcing the case for bringing forward additional residential land.

From a spatial planning perspective, the lands are described as highly accessible and well integrated with the existing urban structure. The site benefits from direct frontage to two public roads, is located within an urban speed limit, and is served by public footpaths and lighting. Public transport services, including Bus Éireann and Expressway routes, operate in close proximity, enabling sustainable travel choices and supporting development aligned with transport-oriented planning principles.

The physical characteristics of the site further support its suitability for residential use. The lands are predominantly flat, with a gentle fall to the west, and no flooding constraints have been identified. Drainage and site investigations were previously carried out in connection with the approved nursing home permission, indicating that technical servicing issues are unlikely to represent a barrier to development. The site is located close to schools, retail facilities and amenities.

An indicative layout is included to demonstrate development potential. This indicates the capacity for approximately 60 dwellings, comprising a mix of two-, three- and four-bedroom units.



Consideration:

The site is located approx. 1km north of Tipperary Town in lands characterised by agriculture and one-off housing. The zoning of the site would not be considered to align with the principles of sequential development or compact growth due to its location in the Town Environs. No details have been provided regarding a potential access to the site and it is considered that achieving sightlines from the existing access would be challenging. It is considered that there are more appropriate, sequential sites within the settlement boundary to accommodate future growth.

Recommendation:

No change to the Proposed Variation is recommended.

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-92	Jamie O'Sullivan	Tipperary Town

Submission Summary:

This submission seeks the rezoning of site TT_6 in Tipperary Town from “New Residential” to “Amenity”, on the basis that the site is physically unsuitable for residential development and that retaining its residential zoning would be inconsistent with adjoining lands. The submission notes that TT_6 shares the same steep topography and environmental characteristics as neighbouring sites TT_5 and TT_7, which are proposed for rezoning to “Amenity”, and that zoning continuity, environmental protection, climate resilience and amenity value should be prioritised over residential use in this location. The submission lists the following rationale for their submission:

- Zoning inconsistency with adjoining lands
- Steep topography / physical constraints
- Protection of urban edge and visual amenity
- Flood risk and surface water management
- Climate change resilience
- Proximity to drainage infrastructure
- Need for a sequential approach to housing development

Consideration:

Having regard to the submission in respect of adjoining land use zoning, physical site constraints, environmental protection, flood risk management and amenity considerations, it is considered that the rezoning of the subject lands at TT_6 to “Amenity” is appropriate and consistent with the proper planning and sustainable development of the area. The shortfall in

the quantum of New Residential zoned land arising from this zoning change is offset by other zoning change recommendations in this report.

Recommendation:

Amend the Tipperary Town Zoning Map to rezone Site TT_6 to Amenity (see Amendment 10 and 31 in Part 2).

Submission Number:	Submission Name:	Settlement:
TCC-C1-VAR1-97	Will McGarry and Associates Ltd. on behalf of Gary Pierse	Tipperary Town

Submission Summary:

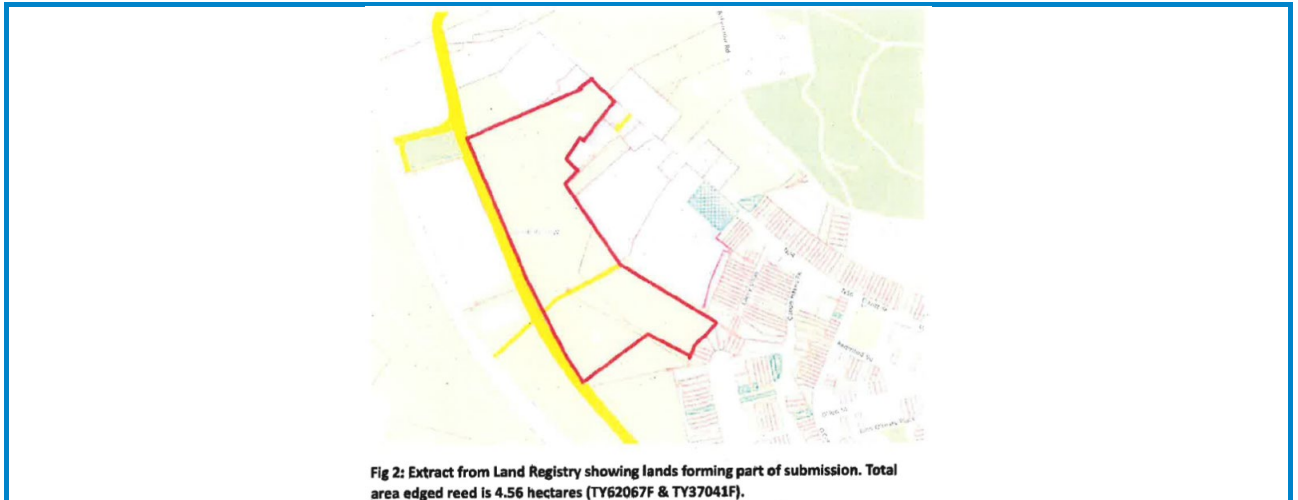
Submission to change the zoning of land on the Limerick Road in Tipperary Town from Light Industrial to Residential. The site is c. 4.56 ha and located in the townland of Bohercow south of the N24 and linking to Canon Hayes Park residential estate.

It is understood that the lands are fully serviced with appropriate foul, surface and potable water. The site is accessed from the N24 and is situated within the 50kph speed limit and can be further accessed from the housing estate to the south east.

The landowners have carried out an extensive marketing campaign to sell the lands with the current zoning but have only seen interest from people with ambitions to develop for residential purposes.

The site is not impacted by any planning restrictions and it is noted that other sites zoned for residential purposes within the plan area are hindered the proposed N24 route corridor.

It is strongly argued that the subject lands are zoned Residential to facilitate growth in Tipperary Town and to comply with the NPF Implementation Guidelines.



Consideration:

The site is currently zoned for Employment use and has been earmarked for the future economic growth of Tipperary Town. While there is residential development existing to the south east of the site, the remaining land is characterised by employment uses. The site is located c. 1km from the town centre, connected by footpaths and is outside the 10 minute walking distance.

It is considered that there are more suitable sites within the settlement boundary to cater for future growth within the Plan period.

Recommendation:

No change to the Proposed Variation is recommended.

2.7 Late Submissions

Submission Number: Late Submission 1	Submission Name: Patrick & Edel Dwyer	Settlement: Twomileborris
Submission Summary: This submission objects to the proposed rezoning of part of their agricultural lands (TMB 2) for residential development on the basis that the lands in question are currently in agricultural use, and that the respondent has no intention of pursuing housing development on the lands. The submission states that the portion of land subject to rezoning contains the sole access point to the farm property. It is further noted that the lands are subject to a long-term lease, and that the proposed rezoning would adversely affect existing and future leasing arrangements. The submission also raises concerns regarding the potential loss of privacy for the landowner arising from the proposed rezoning and any future development.		

Submission Number: Late Submission 2	Submission Name: Killaloe Consultants Ltd on behalf of Robert O'Connor	Settlement: Ballina
Submission Summary: This submission on behalf of the landowner, requests the inclusion of lands abutting 'The Beeches', Drumbane, Ballina, for housing development. The submission considers that the subject lands, under three separate folios, would be a natural extension to the town boundary and notes that services are available in the adjoining estate which is taken in charge.		

Submission Number: Late Submission 3	Submission Name: Hutch O'Malley Consulting Engineers on behalf of Singland Homes	Settlement: Newport
Submission Summary: This submission is on behalf of Singland Homes, the owners of land in Newport, and seeks the zoning of their entire lands and request a revision to the Newport settlement boundary to include all of the lands. This would facilitate the orderly development and masterplanning of the lands and in turn the village.		

The lands currently contain town centre, employment and residential zoning and the current Newport development boundary breaks up the land restricting an integrated approach to create a master plan.

The submission welcomes the proposed zoning of the south-eastern part of the site.

The submission notes the land is serviced (Tier 1) with wastewater and water; direct connectivity to the existing built-up village core; consistent with national policy objectives relating to compact growth. The land would consolidate existing settlement and is ‘ready to go’ to deliver housing in the short term.

The lands were previously zoned for development.

Wastewater Capacity is available.

Sites zoned in neighbouring settlements, Murroe and Birdhill, are unlikely to be delivered within the lifetime of the plan due to lack of capacity in wastewater.

Submission Number:	Submission Name:	Settlement:
Late Submission 4	DH Ryan Architects on behalf of Pat Hayes	Thurles

Submission Summary:

This submission on behalf of the landowner seeks the extension of the Thurles development boundary and the zoning of c. 29.5 ha of lands for residential use. The lands are located on the eastern approach to Thurles with frontage onto the N75 (Dublin Road) and the Moyne Road.

In support of the request the submission states that the lands are contiguous with the existing settlement and represent a logical and sequential extension, supporting connectivity and delivery of active travel infrastructure.

Land is in single ownership, are serviceable and capable of delivery within the plan period.

Lands are strategically located on key transport corridor and aligned with national and regional policy on compact growth and would support the long-term growth of Thurles.

Lands may also have potential to accommodate a section of the proposed Thurles Ring Road / Bypass, as identified within the Local Area Plan transport strategy.

The respondent requests that the lands be considered for inclusion within the development boundary, in whole or in part, and their zoning for residential use.