



Comhairle Contae Thiobraid Árann
Tipperary County Council

Report on Submissions

Pre-Draft Consultation Stage

Thurles Local Area Plan 2024 - 2030

Tipperary County Council Planning Policy and Projects Unit

January 2023

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1.0 Introduction

1.1 Context

Tipperary County Council has commenced the process of preparing a new Local Area Plan (LAP) for Thurles. The LAP will replace the existing Thurles Town and Environs Development Plan 2009 (as extended) and will be prepared in accordance with Section 20 of the Planning and Development Act 2000 (as amended) (the Act) and will set out the land use strategy for the town to ensure the town can support sustainable development and quality of life, in accordance with the strategy as set out in the Tipperary County Development Plan 2022 - 2028. As part of a pre-draft consultation process, interested parties were invited to collaborate with Tipperary County Council at an early stage in shaping the LAP.

An issues booklet setting out the key trends and issues in Thurles and explaining the LAP process and how to get involved was published at the beginning of the pre-draft consultation period on 4th November 2022.

1.2 Public Consultation

There were two components to the pre-draft consultation:

1. An invitation to make submissions from 4th November 2022 to 5th December 2022; and
2. A public consultation workshop on 15th November 2022, Thurles Public Library

A number of mechanisms were used to promote the public consultation process:

1. A public notice was published in local newspapers;
2. Issues booklets and posters were circulated to the library;
3. The Public Participation Network circulated details of the process to their network;
4. A dedicated webpage was setup on the Tipperary County Council website;
5. Further details were posted to the @PlanningTipp Twitter page.

1.3 Submissions to Pre-Draft LAP Consultation Process

The public consultation workshop was attended by approximately 16 persons, who made suggestions and recommendations to inform the plan-making process, five of which are summarised in Section 4. In addition, 13 submissions were received within the consultation period. These submissions are summarised in Section 3 of this report.

1.4 Environmental Assessment and Flood Risk Assessment

The Draft LAP will be subject to Appropriate Assessment Screening, pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC)) and Strategic Environmental Assessment (with

Scoping in advance of publication of the Draft LAP), in compliance with the Strategic Environmental Assessment Directive (2001/42/EC).

In addition, in accordance with Article 14A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004) and 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009), the Draft LAP will be subject to Strategic Flood Risk Assessment to assess the risk of flooding to the development of the town as set out by the Draft LAP.

As a result of these processes the supporting reports will be published to inform of the publication of the Draft LAP:

- Strategic Environmental Assessment Environmental Report,
- Natura Impact Assessment Screening Determination and Natura Impact Assessment Report (as the case may be),
- Strategic Flood Risk Assessment.

1.5 Next Steps

This Report is now submitted to the Elected Members of the Council for their consideration. Thereafter, the Planning Authority will prepare a Draft LAP for the consideration of the Elected Members. The Draft LAP will be informed by submissions received within the consultation period, and the Elected Members considerations. Workshops will be held with the Elected Members to facilitate this process, and to consider relevant national, regional and local planning legislation and guidance relevant to the development of the Draft LAP. The Draft LAP will be placed on public consultation in July 2023 and submissions will be invited from stakeholders and the general public in relation to the draft LAP. After this second period of consultation a Chief Executive's Report on submissions received to the Draft LAP will be prepared, and Elected Members will then consider whether to adopt the LAP or amend it.

2.0 List of Submissions to Pre-Draft LAP Process

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

Submission Type	No.	Name
Statutory Consultees	8	Office of the Planning Regulator (OPR)
State Departments and Bodies	2	Office of Public Works (OPW)
	4	Department of Education (DoE)
	7	Transport Infrastructure Ireland (TII)
	12	Irish Water
	13	National Transport Authority (NTA)
Local Bodies	6	Thurles Sarsfields GAA Club
	11	Jane Ryan, Tipperary Heartland Tourism Group
Zoning Related Submissions	3	Michael & Brona Aherne
	9	Tom O'Sullivan
	10	Larry O'Sullivan
Individual Submissions	1	Egle & Mircea Cercel
	5	Paul Brophy

Submission Type	No.	Name
Individual Submission – Pre-Draft Drop-in Event	1	Ursula Paine
Individual Submission – Pre-Draft Drop-in Event	2	Ursula Paine
Individual Submission – Pre-Draft Drop-in Event	3	Mary and Luke Larkin
Individual Submission – Pre-Draft Drop-in Event	4	Luke Larkin
Individual Submission – Pre-Draft Drop-in Event	5	Richard Long

3.0 Summary and Consideration of Pre-Draft LAP Submissions

Submission Number: 8	Submission Name: Office of the Planning Regulator (OPR)
	Submission Type: Statutory Consultee
<p>Submission Summary</p> <p>The OPR provided feedback to the pre-draft issues paper as set out under the following 10 themes:</p> <p>1. Strategic Policy Framework – section 20(5) of the Act requires the LAP to be consistent with the objectives of the RSES, in addition to the National Planning Framework (NPF), the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant the Development Plan. The OPR encourages the planning authority to liaise with the Southern Regional Assembly to ensure consistency with the RSES. In aligning with the RSES, the LAP should consider the strategic vision, goals and guiding principles of the RSES, in addition to consistency with the relevant regional policy objectives (RPOs). The LAP should also consider practical implementation issues and measures that can best be promoted via the policies and objectives of the LAP.</p> <p>2. Development Plan and Core Strategy – The draft LAP should ensure that residential land use zoning is consistent with the Core Strategy and objective 4-A of the Development Plan. Residential zoning objectives should prioritise housing in areas close to the facilities and services of the town centre where land is already served by appropriate infrastructure or is capable of being serviced within the plan period, and avoid leapfrogging to more peripheral locations. This will ensure that development is consistent with national and regional policy for compact growth, sequential approach to development, tiered approach to zoning (infrastructure), and align with the National Climate Objective.</p> <p>3. Zoning, Compact Growth and Infrastructural Services - The draft Plan should ensure that future residential development makes efficient use of land through increased residential density, in addition to the re-use of existing buildings and infill development schemes consistent with NPO 35 and in accordance with the relevant Ministerial Guidelines.</p> <p>4. Regeneration – The planning authority should take an evidence-based approach to the identification of regeneration sites, or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration, and have regard to the Thurles Town Centre Renewal Strategy 2021. The planning authority is also encouraged to utilise available funding to implement active land management policies and objectives for regeneration, such as the Urban Regeneration and Development Fund.</p>	

5. Education, Social and Community Amenities – The draft LAP should ensure policy support for and promote Thurles' role as a regional educational hub, including National Bioeconomy campus at Lisheen, and the Technological University of Shannon (TUS) Thurles Campus, and as a centre for international and national standard sporting facilities, consistent with RPO 21 of the RSES. The draft LAP should also ensure that the provision of social and community infrastructure is delivered in tandem with new residential zoned lands through mechanisms that monitor existing and proposed development in the town such as the preparation of social audit.

6. Economic Development and Employment - The draft LAP should ensure alignment with the RSES, regarding the support and promotion of the National Bioeconomy campus at Lisheen and Archerstown Business Park as important drivers in employment and economic potential in the town, consistent with RPO 21. The draft LAP should also ensure that an integrated and sustainable approach to employment is supported through policies and objectives of the LAP.

7. Transport and Mobility – The draft LAP should be informed by the preparation of a Local Transport Plan in accordance with the RPO 157, and should integrate land use and transport planning to provide for enhanced active and sustainable transport modes to help achieve the 10-minute town concept. The draft LAP should also ensure it includes appropriate policy support for Thurles Inner Relief Road, consistent with RPO 168. The planning authority is advised to engage and consult with the NTA and TII in this regard.

8. Environment and Natural Built Heritage - The planning authority is advised to liaise with Irish Water to confirm whether the constraints and risk of negative impact on the nutrient sensitive River Suir, subject to RPO 21e, have been resolved through the recent commissioning of the WWTP for Thurles. The planning authority will be aware of the status of the Lower River Suir as a SAC and of its obligations under the Habitats Directive in this regard.

9. Climate Change Mitigation and Adaptation - The draft LAP should seek to include policies and objectives in relation to the implementation of SuDS and nature-based solutions as a means for managing surface water run-off at key development sites. Having regard to RPO 21e, the planning authority is advised to confirm with Irish Water that the wastewater capacity constraints for the town have been resolved sufficient to cater for the projected growth under the core strategy. The planning authority is advised to liaise with Irish Water for further details. An SFRA should be carried out as part of the LAP in accordance with the staged approach to flood risk assessment under the Flood Guidelines, including the carrying out of Justification Tests where required. The planning authority should demonstrate that the sequential approach has been applied with land use zonings overlaid with both Flood Zone A and B in a clear, legible and digital manner. The planning authority is advised to liaise with the OPW in this regard

10. Implementation and Monitoring - The planning authority is encouraged to provide for monitoring of implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines

Consideration: The detailed submission is welcome and responses under each theme are provided below.

1. Strategic Policy Framework:

The Draft LAP will be consistent with the national and regional level objectives and guiding principles set out in the NPF and RSES.

2. Development Plan and Core Strategy:

The provisions of the Tipperary County Development Plan 2022 - 2028 will inform the Draft LAP, and the Draft LAP for the 'Key Town' of Thurles will be written with cognisance to its Core Strategy in order to inform new local development in association with the strategic objectives of the County Development Plan.

3. Zoning, Compact Growth and Infrastructural Services:

A detailed assessment of lands that are currently zoned (residential uses and employment uses) will be carried out in terms of their services, and also their location having consideration to matters such as proximity to the central area, active travel and compact growth principles. This serviced land assessment (SLA) will be set out as an appendix to the Draft LAP.

4. Regeneration:

The Draft LAP will apply the principles of Town Centre First and will identify regeneration and consolidation sites as a priority for collaborative development in the town centre.

5. Education, Social and Community Amenities:

The Draft LAP will ensure that its policies allow for the continued role of Thurles as a regional education hub with respect to its town centre third level institutions and the proximate National Bioeconomy campus at Lisheen. Providing social and community infrastructure to serve the projected population of Thurles through the plan period will be a key consideration of the Draft LAP.

6. Economic Development and Employment:

The SLA will provide for a sequential approach to economic development, this along with the work being carried out in the preparation of Local Transport Plan (LTP) for Thurles will allow for an integrated approach to land use and transport planning for enterprise, employment and enterprise development. The Draft LAP will include policies and objectives to support the growth of the Bioeconomy Campus at Lisheen and Archerstown Business Park.

7. Transport and Mobility:

The NTA and the Council are working with transport consultants, SYSTRA and JB Barry, in the preparation of an LTP for Thurles with modal shift targets. The purpose of the LTP is to provide a transport strategy for the town and its projected growth with an emphasis on promoting active and sustainable transport. The emerging LTP will inform the transport policies and objectives of the Draft LAP and will be incorporated into final LAP when adopted.

8. Environment and Natural Built Heritage:

The Council have appointed environmental consultants, CAAS, to prepare a SEA and AA for the plan area to assess the plan for potential environmental risks. The Council are in continuous engagement with Irish Water in the SLA process to ensure that lands identified for development are appropriately serviced for water and wastewater. The Draft LAP will include objectives for green and blue infrastructure and for the protection and revitalisation of Thurles' rich built heritage.

9. Climate Change Mitigation and Adaptation:

The Draft LAP will be guided by the TCDP's strong climate action ethos in line with the Climate Action and Low Carbon Development (Amendment) Act 2021 and will include locally specific climate mitigation objectives. An SFRA will be prepared for the plan area to ensure that flood risk is mitigated against. The SFRA will be a key consideration in the SLA. The Draft LAP will align with the TCDPs objectives for the implementation of SuDs as a drainage solution.

10. Implementation and Monitoring:

The LAP objectives will be monitored for implementation as per the provisions of the Development Plan Guidelines.

Submission Number: 2	Submission Name:
	Office of Public Works (OPW)
	Submission Type:
	State Departments and Bodies
Submission Summary	
<p>The planning authority should refer to the Section 28 Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009), to ensure that the key principles of flood risk management and sustainable planning are adopted.</p> <p>The OPW and TCC undertook the National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme, through which Flood Risk Management plans (FRMPs) and flood maps were prepared. The CFRAM Programme included analysis of flood risk in Thurles, the LAP should be guided by such maps as part of its SFRA. The submission provides further guidance on the flood risk management within the Plan area which is summarised within.</p>	
<p>Consideration: This submission is noted and the Draft LAP will endeavour to avoid future flood risk in Thurles through appropriate zoning and flood risk policies, informed by a detailed Strategic Flood Risk Assessment.</p>	

Submission Number: 4	Submission Name:
	Department of Education (DoE)
	Submission Type:
	State Departments and Bodies
Submission Summary	

The Department notes the CDP population growth targets for Thurles to 2031 and deduces that should the projections materialise, a requirement for additional education provision may arise. The Department notes the issues paper's emphasis on town centre regeneration and compact growth and highlights the associated need for the provision of schools in town centre sites to accommodate such growth. The LAP should be explicit in its support for adequate school accommodation, including new schools and the expansion of existing schools. The Department highlights the requirement for future unseen capacity, giving the Ukrainian crisis as an example, and cites the pressures that this places on existing schools. It also anticipates the future requirement for Special Education Needs at primary and secondary level and the associated additional requirement for accommodation to facilitate such.

Consideration: This submission is noted and provisions (landzoning for new schools if required or expansion of existing schools) in consultation with the Department of Education will be included within the Draft LAP to account for the demand for school places that arise due to potential foreseen and unforeseen population increases. In this respect the Planning Authority will work with the Department in achieving this objective.

Submission Number: 7	Submission Name: Transport Infrastructure Ireland (TII)
	Submission Type: State Departments and Bodies

Submission Summary

TII Recommends that the development objectives included in the Draft LAP reflect the provisions of the NPF, Spatial and National Roads Guidelines (DoECLG, 2012) and RSES, for the ongoing safe and efficient operation of national roads.

TII would welcome the inclusion of strategic policy requirements to reflect the following:

- Reduce reliance on private cars and achieve a modal shift to sustainable transport;
- Promote integrated land use and transport planning
- Maintain the strategic function, capacity and safety of the national road network, including planning for future capacity enhancements
- Ensure existing transport networks are maintained to a high level
- Prepare a Local Transport Plan for Thurles

The Council may wish to identify local improvements to national roads within the LAP. The LAP shall include a policy to avoid the creation of additional accesses onto national roads over 50kph. The Council is requested to reference the Road Safety Impact Assessment and Road Safety Audit in the LAP for new development proposals. The Council is requested to include the requirement for Traffic and Transport Assessments (TTA) in the LAP citing the TTA Guidelines (TII, 2014). A forward planning approach to roadside service facilities is encouraged in

accordance with the Policy on Service Areas (TII, August 2014). Further guidance is provided on signage, noise, safeguarding national road drainage regimes and renewable energy and grid connections which is summarised in the submission.

Consideration: This submission is noted and will be considered in the preparation of the Draft LAP. The provisions of the TCDP in terms of sustainable transport planning and management will inform the Draft LAP, and the Draft LAP will be written to inform new local development in association with the strategic objectives of the County Development Plan (including Development Management provisions that are applicable to all urban towns).

It should be noted that with respect to land zoning, a detailed Serviced Land Assessment of lands that are currently zoned will be carried out of their services, and also their location having consideration to matters such as proximity to the central area, roads infrastructure, active travel and compact growth principles. This SLA will be set out as an appendix to the Draft LAP. In addition, the NTA and the Council are working with transport consultants, SYSTRA and JB Barry, in the preparation of a Local Transport Plan (LTP) for Thurles. The purpose of the LTP is to provide a transport strategy for the town and its projected growth with an emphasis on promoting active and sustainable transport. The emerging LTP will inform the transport policies and objectives of the Draft LAP and will be incorporated into final LAP when adopted.

Submission Number: 12

Submission Name:

Irish Water

Submission Type:

State Departments and Bodies

Submission Summary

Irish Water provide a summary of their key guiding policies and plans. A summary of the water and wastewater infrastructure and constraints is provided as follows.

Water Supply Capacity

Settlement:	Existing population (CSO 2016):	CDP 2022-2028 Population target to 2028:	CDP 2022-2028 population increase:	Water Supply Capacity:
Thurles	7,940	9,528	1,589	A new Water Treatment Plant was recently commissioned in Thurles and there is sufficient capacity to cater for the projected growth within the lifetime of the plan.

Water Network Known Constraints

Settlement:	General Network Infrastructure
Thurles	Currently it is envisaged that capacity is available in the main networks supplying the town to cater for the population targets identified to 2028. Local network upgrades would need to be delivered to provide capacity to individual sites, these can be customer driven/funded in accordance with our Connections Charging Policy.

Wastewater Treatment Capacity

Settlement:	Existing population (CSO 2016):	CDP 2022-2028 Population target to 2028:	CDP 2022-2028 population increase:	Wastewater Treatment Capacity:
Thurles	7,940	9,528	1,589	The latest wastewater treatment capacity register, issued in 2022, indicates there is sufficient capacity to cater for the projected growth within the lifetime of the plan.

Wastewater Network Known Constraints

Settlement:	General Network Infrastructure
Thurles	A Drainage Area Plan, incorporating a Wastewater Infrastructure Plan, has been completed for Thurles agglomeration, identifying upgrade needs to cater for growth and alleviate hydraulic and environmental constraints. Currently it is envisaged that capacity is available to cater for the population targets identified to 2028. Local network upgrades would need to be delivered in some areas to provide capacity to individual sites, these can be customer driven/funded in accordance with the requirements of the Connections Charging Policy.

Sequential development in areas with existing water services is preferable. Available network information indicates that network extensions may be required to service some parts of the town that may be identified for development and localised network upgrades may also be required. In settlements where WWTP is close to sensitive receptors such as housing, any future development should take account of the WWTP and its potential growth. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wwtps should not generally be considered by planning authorities. All new residential and commercial/industrial developments wishing to connect to an Irish Water network are to be assessed through Irish Water's Connections and Developer Service.

Consideration: This submission is noted and will be considered in the preparation of the Draft LAP. The Council will work with IW in the further assessment of this submission and in the preparation of the LAP with particular reference to SLA, capacity of existing water services, Irish Water own plans and assessment of lands to be zoned.

Submission Number: 13**Submission Name:**

National Transport Authority (NTA)

Submission Type:

State Departments and Bodies

Submission Summary

The NTA provided feedback to the pre-draft issues paper as set out under the following **12 themes**:

1. Guiding Principles: A summary of the guiding principles to support the consolidation of urban-generated development in complement with the integration of land use and transport planning is provided.

- 2. Road User Hierarchy:** The LAP should align with The National Sustainable Mobility Policy (DoT, 2022) and The National Investment Framework for Transport in Ireland (DoT, 2021) and should seek the reallocation of road space to sustainable transport in appropriate locations. NIFTI sets the road user hierarchy as 1. Active Travel, 2. Public Transport, 3. Private Vehicles and sets the intervention hierarchy as 1. Maintain, 2. Optimise, 3. Improve, 4. New.
- 3. Climate Action Plan (CAP) :** As per the CAP the LAP should seek to; reduce demand for travel; increase public transport and active travel; convert to a zero emissions transport fleet.
- 4. Movement at Settlement Level – Local Transport Plans (LTP):** The submission notes the commencement of the LTP for Thurles and supports the intention for the LTP to be taken forward as part of the LAP.
- 5. Movement at an Inter-Settlement Level:** There is an opportunity to explore the commuting patterns to and from the town which may assist to identify its transport requirements.
- 6. Walking and Cycling:** The LTP should identify walking and cycling deficiencies in the town and propose measures to enhance routes from origin to destination.
- 7. Provision of Public Transport Services in Rural Areas:** The NTA will continue to provide rural transport services through Local Link and their 'Connecting Ireland' plan seeks to further improve mobility in rural areas. The LAP should acknowledge the role rural transport services perform in providing for social and economic connectivity.
- 8. Accessibility:** Enabling universal access and facilitating and promoting universal design should be a key consideration in the LAP, as it relates to transport policies and objectives. Objectives which promote universal design in the external built environment such as providing separate pedestrian entrances, the provision of dropped curbs and tactile paving will provide a safer and more attractive environment for all.
- 9. Strategic Road Investment:** In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that development objectives should be in accordance with the Spatial Planning and National Roads Guidelines (DoECLG 2012), and that this should be referenced in the LAP.
- 10. Traffic management:** The LTP, in informing the preparation of the LAP, should also consider traffic management within Thurles with the objective of ensuring that the movement of people by public transport, walking and cycling, and the movement of goods, is not adversely affected by private car traffic, and that the impacts of traffic congestion can be managed. In particular this should include an analysis of car parking provision within the town and the inclusion of objectives and measures to manage car parking which is a key determinant of the likelihood of someone using a car. This should include reviewing and reallocating on-street parking; using parking charges to ensure a short stay parking over commuter use; reviewing access arrangements into car-parks to improve road use efficiency.
- 11. NTA Guidance Documents:** A suite of guidance documents are listed to be inform the LAP.

12. Indicators – Mode Share: It is recommended that consideration is given at the LAP level to include sustainable transport indicators, including mode share, for the purpose of monitoring the effectiveness of policies and development objectives. The NTA would be happy to work with Tipperary County Council on the development and analysis of sustainable transport indicators, in conjunction with the OPR.

Consideration: This detailed submission is noted and will be considered in the preparation of the Draft LAP. It should be noted that with respect to land zoning, a detailed assessment of lands that are currently zoned will be carried out of their services, and also their location having consideration to matters such as proximity to the central area, roads infrastructure, active travel and compact growth principles. This SLA will be set out as an appendix to the Draft LAP. In addition, the Draft LAP will be accompanied by an LTP with objectives for active travel and public transport investment, and targets for modal shift. Responses under each of the submission themes are provided below.

1. Guiding Principles:

The Draft LAP will have an emphasis on compact growth, sequential development and integrated land use and transport planning and will consider the guiding principles set out in the NPF, the RSES and the NTA's submission.

2. Road User Hierarchy:

The road user hierarchy and the objectives of the National Sustainable Mobility Policy (DoT, 2022) and NIFTI (DoT, 2021) will be considered in the Draft LAP and the associated LTP.

3. Climate Action Plan:

The Climate Action Plan (DECC, 2019) greatly informed the TCDP and the current iteration will be a similar guide for the objectives of the Draft LAP.

4. Movement at Settlement Level – Local Transport Plans (LTP):

As noted in the submission the Council is working with the NTA and transport consultants, SYSTRA and JB Barry, in the preparation of an LTP for Thurles. The emerging LTP will guide the transport objectives of the LAP and will form part of the LAP once adopted.

5. Movement at Inter-Settlement Level:

Both the LTP and the 'Commuting and Jobs Profile for Tipperary' (TCC, 2018) provide analysis of movement at an inter-settlement level which provides important data in the preparation of sustainable transport solutions to and within the settlement.

6. Walking and Cycling:

The LTP is conducting a comprehensive analysis of the existing walking and cycling network in Thurles and identifying how these can be enhanced in order to achieve a modal shift away from cars. The Council's dedicated Active Travel Team are actively engaging with the NTA in the identification of potential walking and cycling infrastructure projects to be put forward for internal and external funding.

7. Provision of Public Transport Services in Rural Areas:

The LTP has considered that NTA’s draft plans for enhanced public transport services and the LTP team is and will continue to engage with Tipperary ‘Local Link’ throughout the LTP process.

8. Accessibility:

The LAP will align with the TCDP in promoting disability awareness and improved equal access for all through ‘Universal Design’ for public transport access, housing, social, cultural and recreational facilities and the public realm, to improve quality of life equally for abled and disabled citizens.

9. Strategic Road Investment:

The key transport corridors traversing the Plan area will be considered for their strategic function within the Draft LAP.

10. Traffic management:

Traffic management and car-parking will be key considerations in the LTP process.

11. NTA Guidance Documents:

The guidance documents have formed part of the baseline assessment for both the LAP and LTP.

12. Indicators – Mode Share:

The Council will continue to work with the NTA and the appointed transport consultants to prepare appropriate indicators for mode share so that the plans can be effectively monitored and assessed.

Submission Number: 6	Submission Name:
	Thurles Sarsfields GAA Club
	Submission Type:
	Local Bodies
Submission Summary	
<p>Thurles Sarsfield’s submission sets out the club’s background and purpose, and proposes amendments to a proposed relief road that is included in the objective map of the existing Thurles & Environs Development Plan 2009. The submission proposes three options for the re-alignment of the road that would allow the club to expand and deliver improved and safer facilities. Advantages and potential disadvantages for the three options (shown below) are summarised in the submission with option one detailing the most advantages from the club’s perspective.</p>	

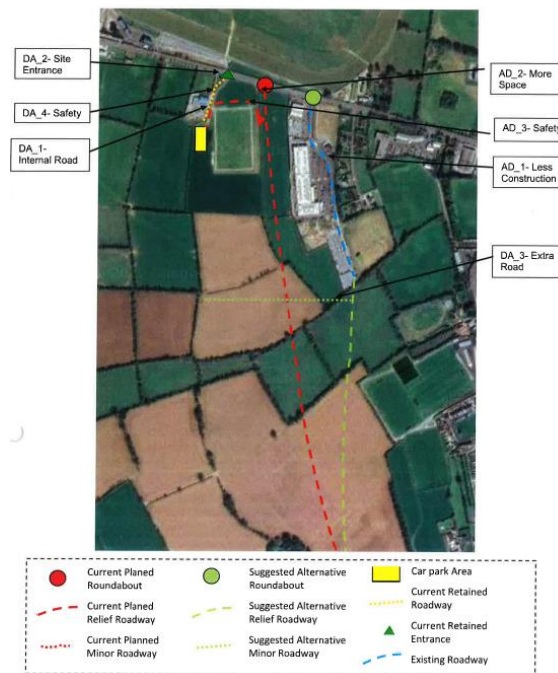
4.5 Proposal 1 - Satellite Map:



4.9 Proposal 2 – Satellite Map:



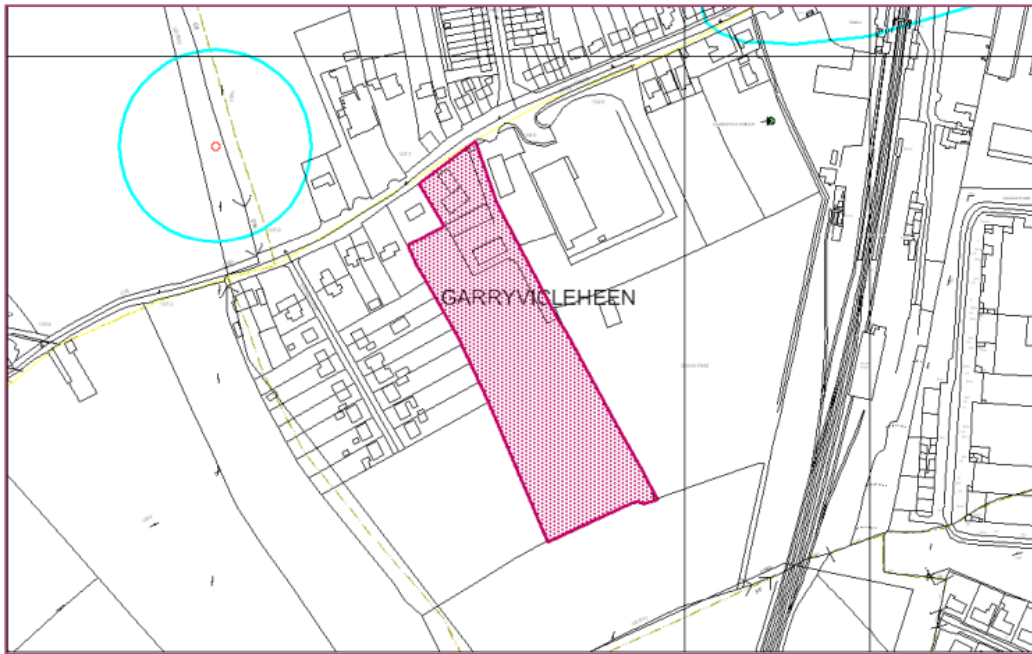
4.12 Proposal 3 – Satellite Map:



Consideration: This submission is noted and will be considered in the preparation of the LAP. The submission will be further considered in the development of options for the Thurles Local Transport Plan which will form part of the adopted LAP.

Submission Number: 11	Submission Name: Jane Ryan, Tipperary Heartland Tourism Group
	Submission Type: Local Bodies
Submission Summary <p>This submission outlines a proposal by the group to be considered in the LAP. The proposal suggest that the Council consider the development of a 200-unit student village that becomes a tourism village in the summertime. This development would cater to the demand for student accommodation and would combat the shortage of tourism bedrooms. The project could make use of existing buildings or be a new development on Council or Church lands in the centre of Thurles. It is essential that it is fully sustainable, energy efficient and accessible for all. The project will be a social enterprise with a board including Tipperary Tourism Group, MIC, TUS and TCC. All profits will be fed back into local education and tourism.</p>	
Consideration: This submission refers to Council or Church owned lands, however, no specific location was suggested for the proposed development. This submission is noted and will be considered in the preparation of the Draft Thurles Local Area Plan 2024, noting that lands will be zoned for both mixed use development and new residential development in the plan area having consideration to the principles of Town Centre First and Compact growth.	

Submission Number: 3	Submission Name: Michael & Brona Aherne
	Submission Type: Zoning Related Submission
Submission Summary <p>This submission is regarding lands at Garryvicleheen, to the rear of Aherne’s petrol station. The submission notes that a pre-planning was previously carried out for the development of a nursing home, associated offices and a medical centre on the site. The submission also sets out ambitions for a ‘purpose built, sustainable nursing home’ in Thurles, on said site. The submission requests that the site retains its Retail and Commercial zoning in the new LAP to facilitate such development.</p>	
Consideration: This submission is noted and will be considered in the preparation of the Draft Thurles Local Area Plan 2024. No map was provided, the following was extracted from the Thurles and Environs Development Plan 2009:	



It should be noted that a detailed assessment of lands that are currently zoned will be carried out in terms to assess their services, and also their location having consideration to matters such as the total quantum of available lands, proximity to the central area, active travel and compact growth principles. This serviced land assessment (SLA) will be set out as an appendix to the Draft Plan and will inform any change to currently land zoning.

Submission Number: 9
Submission Name:

Tom O'Sullivan

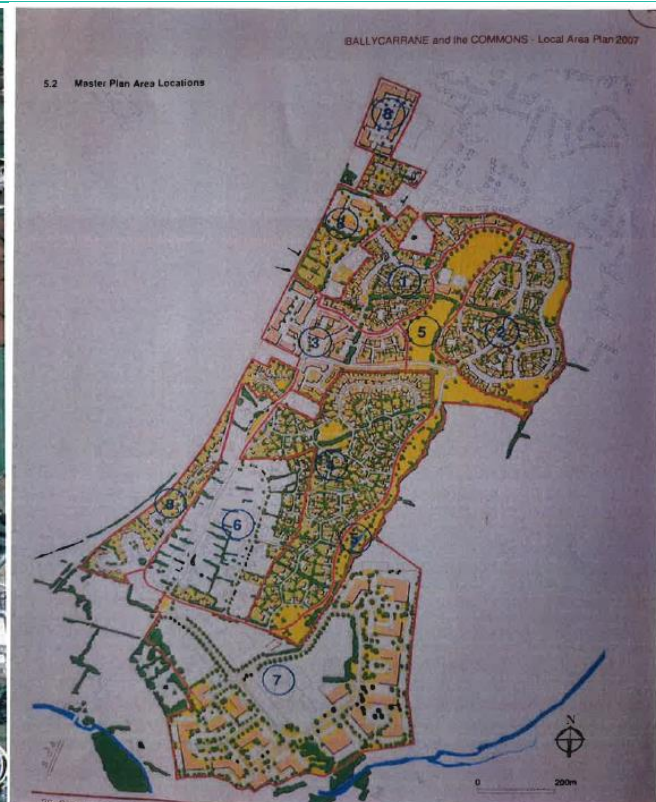
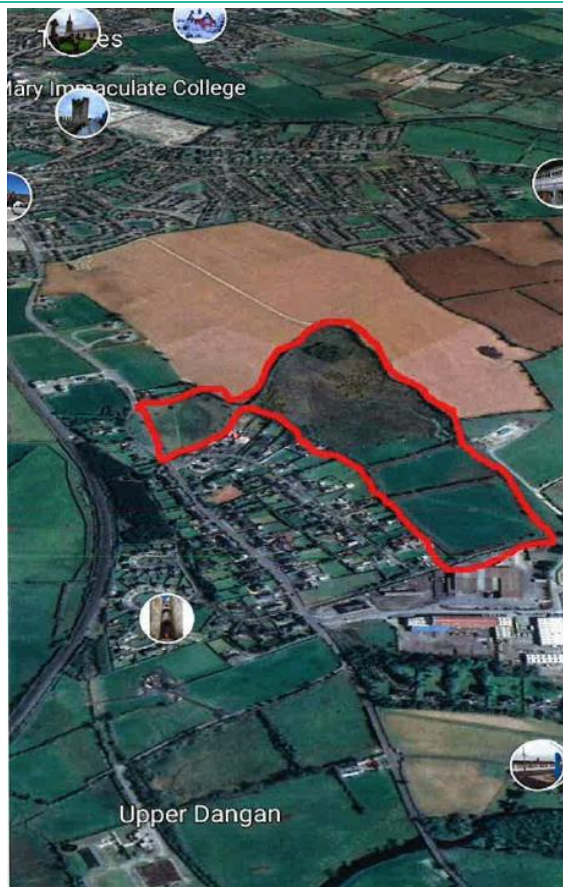
Submission Type:

Zoning Related Submission

Submission Summary

The submission is twofold, the first section proposes the provision of a walkway canopy on all sides of Liberty Square to complement the works already completed and to encourage more people into the town centre.

The second section proposes the zoning of a 36-acre parcel of land on the R659 for residential and other uses. The land was included in an LAP for Ballycurrane and The Commons 2007 until the plan was revoked. The land was kept in reserve for future development by introducing an amenity zoning. Should the land be zoned the land would be put on the market for development immediately. The land is suitable for development as all services and public infrastructure either adjoin or traverse the site. Gravity access to the foul sewer is available without a pumping station. Access to surface water drainage and a water connection adjoins the property and there is footpath and lighting connectivity with the town. There are good sightlines onto the R659. A portion of land should be have an amenity area for existing and future residents.



Map B – From the 2007 Ballycurrane and the Commons LAP. See section 4 on Map which covers the 36acre land parcel.

Consideration: This submission is noted and will be considered in the preparation of the Draft LAP. A detailed assessment of lands that are currently zoned will be initially carried out in terms to assess their services, and also their location having consideration to matters such as the total quantum of available lands, proximity to the central area, active travel and compact growth principles. This serviced land assessment (SLA) will be set out as an appendix to the Draft LAP and will inform any change to currently land zoning. The site is primarily outside of the existing LAP boundary, consideration of lands outside the LAP boundary will only be carried out should the quantum of land within the LAP boundary be insufficient to cater for the projected population target for Thurles.

Submission Number: 10

Submission Name:

Larry O'Sullivan

Submission Type:

Zoning Related Submission

Submission Summary

This submission proposed the zoning of 42 acres of land between the town centre and Thurles Golf Club for residential and mixed uses. The submissions states that the site is suitable for such uses as services and public infrastructure either run through or adjoin the site, enabling connection to same. Gravity access to the fowl sewer would not be possible without a pumping station but it would be possible to either provide a localised treatment system pumping effluent to the town

network or to provide a self-contained on-site system. The site provides access to surface water drainage, access to watermains and footpath and lighting connection to the town centre. Access to the site is from the N62 with a 60km speed limit and good sightlines. While a portion of the land is subject to flooding, it is stated that a large portion is developable. Should the land be zoned residential it will go on the market immediately to allow for development.



Map/Photo A – Shows the flood info to the property. Property outlined in red.

Consideration: This submission is noted and will be considered in the preparation of the Draft LAP. A detailed assessment of lands that are currently zoned will be initially carried out in terms to assess their services, and also their location having consideration to matters such as the total quantum of available lands, proximity to the central area, active travel and compact growth principles. This serviced land assessment (SLA) will be set out as an appendix to the Draft LAP and will inform any change to currently land zoning. The site is primarily outside of the existing LAP boundary, consideration of lands outside the LAP boundary will only be carried out should the quantum of land within the LAP boundary be insufficient to cater for the projected population target for Thurles

Submission Number: 1

Submission Name:

Egle & Mircea Cercel

Submission Type:

Individual Submission

Submission Summary

This submission is a request for RPS59 (Thurles and Environs Development Plan 2009) to be removed from the Record of Protected Structures (RPS)

Consideration: The review of the RPS for Thurles will be carried out separate to the LAP process under Section 55 of the Planning and Development Act 2000 (as amended). The submitter will be notified of this process, and the mechanism for making a formal submission in due course.

Submission Number: 5	Submission Name: Paul Brophy
	Submission Type: Individual Submission

Submission Summary

This submission suggests the following actions and initiatives for Thurles:

1. Employment/Economy/Transport/Movement: There should be more of a focus on attracting remote workers and commuters. Could we develop a new access into the train station via Stradvoher Industrial Estate and linking to Clongour and the relief road at Lidl thus avoiding Bowes Corner? Could Transport for Ireland include more frequent shorter Local Link routes connecting to the train station? Third Levels should be supported to develop innovation hubs, these can be developed by the council in partnership with the IDA for our agri-sector. Improved active transport links for work and education journeys.

2. Tourism/Recreation/Built Heritage: The two castle towers, which are privately owned, could provisions be put in place to encourage development? The river is in poor state, water-based tourism could be encouraged. Town walks/history trails to be developed e.g. Upperchurch Walking Festival. GAA to contribute to enhanced community.

3. Homes and Community: The Square needs life after 6pm. Restrictions around planning of historic structures should be relaxed.

4. Climate Action and Biodiversity: A town allotment near the river, maybe adjoining schools is proposed.

Consideration: The positive comments and suggestions as set out in this submission are noted and will be considered in the preparation of the Draft LAP. It should also be noted that there are other services of the Council such as the Local Enterprise Office, the Town Centre First Programme, the Urban Regeneration and Development Fund that are working towards these objectives in tandem with the planning processes. In addition, external supporting services including the Leader Programme., the SEAI Sustainable Energy Communities etc that will help support social and economic growth of the area.

4.0 Summary and Consideration of Submissions Made in Pre-Draft Drop-in Event

A drop in public consultation event was held in Thurles public library on on 15th November 2022. Attendees were invited to place a numbered sticker in the LAP area on the map (pictured below) should they wish to make a site-based submission. Five such submissions were made and are summarised below.

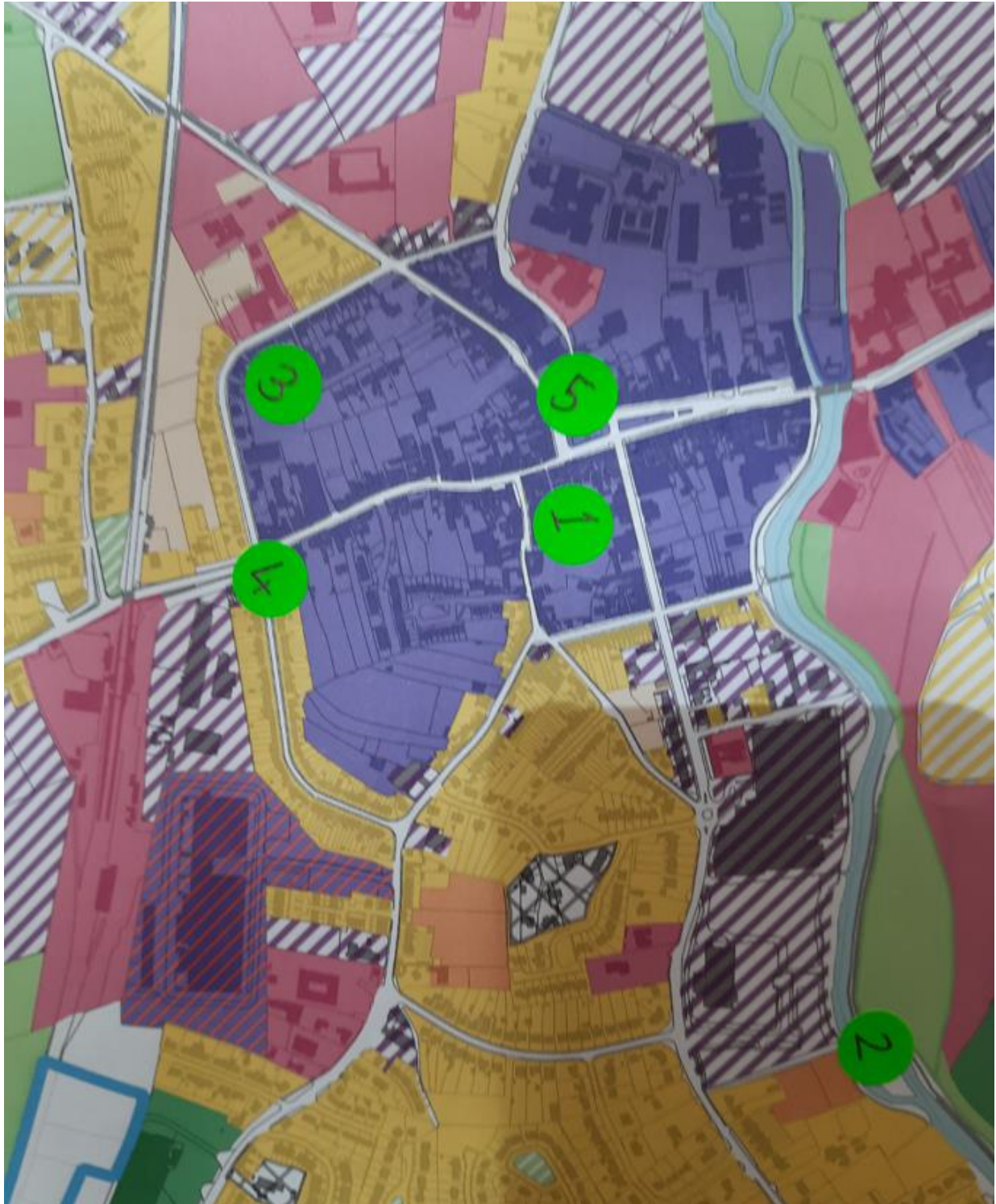


Figure 1 Location Map for Comments as identified Below

Sticker Number: 1	Submission Name: Ursula Paine
	Submission Type: Individual Submission – Pre-Draft Drop-in Event
Submission Summary Attendee would like to see vacant land at Wolfe Tone Place developed with elderly living units. There is also no family resource centre in town, perhaps the old Post Office would be a suitable location for one.	
Consideration: This submission is noted and will be considered in the preparation of the Draft Thurles Local Area Plan 2024	

Sticker Number: 2	Submission Name: Ursula Paine
	Submission Type: Individual Submission – Pre-Draft Drop-in Event
Submission Summary Attendee would like to see the river utilised better – an outdoor recreation facility similar to the one in Scariff Co. Clare would be ideal.	
Consideration: This submission is noted and will be considered in the preparation of the Draft Thurles Local Area Plan 2024	

Sticker Number: 3	Submission Name: Mary and Luke Larkin
	Submission Type: Individual Submission – Pre-Draft Drop-in Event
Submission Summary Attendees would like to see elderly living units in the town centre. Friar Street/Castle Avenue backlands identified as an appropriate location.	
Consideration: This submission is noted and will be considered in the preparation of the Draft Thurles Local Area Plan 2024	

Sticker Number: 4	Submission Name: Luke Larkin
	Submission Type: Individual Submission – Pre-Draft Drop-in Event
Submission Summary	

Bowes Corner is identified as a massive traffic danger spot due to its multiple exits. Council Engineers should engage with lorry drivers to find a solution.
Consideration: This submission is noted and will be considered in the preparation of the Draft Thurles Local Area Plan 2024

Sticker Number: 5	Submission Name: Richard Long
	Submission Type: Individual Submission – Pre-Draft Drop-in Event
Submission Summary Attendee would like to see traffic lights on the Templemore entering the Square as a pedestrian safety measure.	
Consideration: This submission is noted and will be considered in the preparation of the Draft Thurles Local Area Plan 2024	