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Thurles Local Area Plan,
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Tipperary County Council,
Civic Offices,
Limerick Road,
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18th December 2023

**RE: Submission to the Proposed Material Alterations to the Draft Thurles & Environs
Local Area Plan 2023-2029.**

SRA File Ref: 23/008

A Chara,

I refer to your notice of the preparation of *Proposed Material Alterations to the Draft Thurles and Environs Local Area Plan (LAP) 2024-2030* received on 17th November 2023.

The Southern Regional Assembly (SRA) welcomes this opportunity to make a submission on the Proposed Material Alterations (PMAs) and commends the continued work being undertaken as part of the preparation of a new statutory LAP for Thurles. This is an important next step in the strategic planning framework for Tipperary following on from the adoption of the *Tipperary County Development Plan 2022-2028*, and recognition of Thurles as a Key Town in the *Regional Spatial & Economic Strategy for the Southern Region (RSES)*.

This submission is a follow-up to our submission dated 11th September 2023, on the *Draft Thurles & Environs Local Area Plan 2024-2030* and is intended to assist the Council in ensuring the principles set out in the LAP align with the Development Plan, RSES and National Planning Framework. It also aims to ensure Thurles can maximise its potential and investment under Project Ireland 2040 and the National Development Plan and promote its transition to a more sustainable settlement pattern. It is not intended to provide detailed comments on all the

PMA's but rather to focus on matters considered to be of a strategic, regional nature, referring to the relevant policy context of the RSES and its current implementation actions, where relevant.

Role of Thurles as a Key Town

The SRA notes and welcomes the inclusion of additional text in PMA 4 (Section 1.4.1) which strengthens the recognition of Thurles's designation as a Key Town. This recognition is important in ensuring the sustainable growth of the town in line with Regional Policy Objective (RPO) 21 of the RSES.

Town Centre First Approach and Compact Growth

As set out in our submission to the *Draft Plan*, the SRA strongly welcomes the proactive approach set out in the *Town Centre Strategy* and objectives for increasing the residential population of the town centre, as well as wider measures to support implementation of the 10 Minute Town Concept.

We note and welcome changes to the extent of residentially zoned land, and particularly the overall reduction of land zoned *New Residential* from 48.19 ha to 45.95 ha. While recognising the significant reduction in land zoned *New Residential* from the existing LAP, the SRA retains concerns regarding the overall amount of land zoned for residential development, with the *Draft Plan* setting out a requirement for approximately 39.4 ha (including land zoned in the *Urban Core* and *Regeneration*) of serviced/serviceable residential lands by 2030, in line with the Development Plan methodology. To help ensure that the extent of lands zoned *New Residential* does not undermine objectives for town centre regeneration and compact growth, the monitoring and implementation framework included in PMA 39 could consider how an appropriate quantum of residential development is being delivered within the Urban Core and Regeneration areas as part of the annual core strategy monitoring set out under Objective 2E. The residential density figure of 25 dph used as part of the calculations, is considered very low (including in a suburban context) and the SRA still considers higher density targets should be considered as part of the calculations particularly for sites within the town centre and close to public transport service. This would ensure the LAP fully embraces and promotes the Town Centre First approach and aligns with its objectives of compact and sequential growth as well as national and regional guidance regarding compact growth.

Economic Development and Recreational Facilities

The SRA note and welcome additional references, through PMA's 4 and 39 (Objective 4B of the newly incorporated Monitoring Framework), of the importance of the proposed National Bioeconomy Campus at the nearby site of Lisheen, and potential from this for Thurles to be a driver of the bioeconomy.

We note the inclusion of an additional paragraph in EM2 (Elected Members Proposed Amendments) (Section 5.4) outlining support for a new Regional Sports Campus, and the progressed nature of the proposed project. The RSES, through RPO 21, recognises the important role of the Thurles as a centre for sporting events, activities and culture. Specific support for regional recreational and sporting facilities is set out in RPO 198 *Sport and Community Organisations* and RPO 199 *Larger Sports Projects*. We would welcome further

engagement with Tipperary County Council, TUS and other stakeholders on the strategic role of this project in a regional context, and role the Sports Hub will fulfil along with wider network regional sporting facilities in the County and elsewhere in the Southern Region.

Sustainable Transport and Mobility

The SRA welcomes additions and clarifications on issues relating to sustainable mobility including integration of actions from the Local Transport Plan into the document. RPO 157 *Local Transport Plans (LTP)* notes how LTPs maximise the opportunities for the integration of land use and transport planning, prioritise the delivery of sustainable and active travel, identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets and identify the transport interventions required within the plan area and in the wider context, to effectively accommodate the anticipated increase in demand. The SRA in conjunction with the two other Regional Assemblies, has recently launched the *Sustainable Mobility Academy* as part of *Pathfinder Programme* of the *National Sustainable Mobility Policy*, which could provide some useful examples or case studies to assist further development in this area, and is available through the following link: [Sustainable Mobility Academy - Home](#).

The SRA note the inclusion of proposed new Objective 3G (Text Amendment EM1- Elected Members Proposed Amendments) supporting the provision of car parking spaces in suitable locations within the town, including pocket carparks and multi-storey carparks. It is considered that this proposal may undermine some key elements of the Local Transport Plan on modal shift and support for active travel measures and should be considered in terms of overall measures to promote more sustainable modes of transport.

Climate Action and Sustainability

The SRA welcomes the inclusion of additions to the text and mapping relating to climate resilience, particularly the amendments and clarifications to the extent of areas identified as being exposed to flood risk. As noted in our submission on the draft Plan, the SRA strongly support policies and objectives within the Plan which support the transition to a low carbon economy, including nature-based solutions, natural heritage and blue/green infrastructure. The SRA's *Our Green Region - a Blue Green Infrastructure and Nature-based Solutions Framework for the Southern Region* would provide further support and guidance in development of blue and green infrastructure in the town, and the implementation of nature-based solutions to climate resilience.

Conclusion

The SRA welcomes the public consultation at Proposed Material Alterations stage for the preparation of a new Local Area Plan for Thurles. The RSES team is available for further consultation and for any clarification required regarding this submission.

Mise le meas,



David Kelly

Director, Southern Regional Assembly