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Thurles Local Area Plan,
Planning Department,
Tipperary County Council,
Civic Offices,
Limerick Road,
Nenagh,
Co. Tipperary.

11th September 2023

RE: Submission to the Draft Thurles & Environs Local Area Plan 2024-2030.

SRA File Ref: LP 23/008

A Chara,

I refer to your notice of the preparation of the Draft Local Area Plan (LAP) for Thurles 2024-2030 received on 28th July 2023.

The Southern Regional Assembly (SRA) welcomes this opportunity to make a submission on the Draft Plan 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 Co. 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 intended primarily to assist and support the Council in ensuring the principles set out in the LAP align with the Development Plan, RSES and National Planning Framework. It also intends 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. The submission addresses the following themes:

A: Role of Thurles as a Key Town

- B: Town Centre First Approach and Compact Growth
- C: Economic Development and Enterprise
- D: Sustainable Transport and Mobility
- E: Climate Action and Sustainability
- F: Environmental Assessment

A: Role of Thurles as a Key Town

The SRA notes and welcomes the recognition of the role of Thurles as a Key Town throughout the Draft Plan. Regional Policy Objective (RPO) 21 *Thurles* of the RSES aims:

- a. *To support and promote the role of Thurles as a strategically located urban centre of significant influence in a sub-regional context and driver of county and regional prosperity by harnessing the employment and economic potential of the town together with Lisheen, Thurles National Bio Economy Hub and the emergence of a new economic model focused on two principal pillars: low carbon growth and resource efficiency, while leveraging its strategic location and accessibility on inter-regional road and rail networks;*
- b. *To support and promote the role of Thurles as a centre for international and national standard sporting facilities. This builds on the opportunities and landholdings available to the third level institutions and sporting bodies within the town;*
- c. *To support the delivery of the infrastructural requirements identified for Thurles including support for the delivery of projects submitted under the Urban Regeneration and Development Fund subject to the outcome of the planning process and environmental assessments;*
- d. *To strengthen 'steady state' investment in existing rail infrastructure and seek investment for improved infrastructure and services to ensure its continued renewal and maintenance to a high level in order to provide quality levels of safety, service, accessibility and connectivity including improved frequency and journey times;*
- e. *Future growth of the town should be planned for on a phased basis in consultation with the local authority and Irish Water to ensure that sufficient wastewater capacity is accounted for and that further growth avoids negative impacts on the nutrient sensitive River Suir.*

The inclusion of these key aspects of the RSES in the various chapters of the Draft Plan are of important in ensuring it develops to its potential and grows in a planned and sustainable manner and it is considered that references to the role of Thurles as a Key Town and its key aspects could be strengthened further particularly in Chapters 1.0 *Introduction* and 2.0 *Planning and Development Strategy*.

B: Town Centre First Approach and Compact Growth

In terms of the overall planning and development strategy for Thurles, the SRA particularly welcomes the proactive approach shown by the inclusion of a specific chapter *Town Centre Strategy*, and the strategy statement: *to ensure that the vibrancy and vitality of the town is*

maintained and enhanced. This will be achieved by increasing the residential population of the town centre, regenerating town centre brownfield lands, implementing the Thurles Town Centre Renewal Strategy, and providing a high-quality, pleasant and enjoyable town centre environment focused on connectivity, active modes of travel and public transport for the community and large student population.

The success of the Council in attracting funding such as the URDF and RRDF to develop this framework is noted and will help achieve further success in this area. Existing plans such as *Thurles Town Centre Renewal Strategy (2021)*, as well as the proposed *Town Centre First Masterplan* to be developed under the *National Town Centre First Policy*, will provide more detailed guidance and ensure that the town centre is developed to best design practice. The SRA also welcomes the inclusion of Appendix 3: Schedule of Consolidation and Regeneration Sites as part of the Draft Plan in this regard. The importance of ensuring excellence in the design approach to developing these sites will be a key factor in attracting people to live, visit and work in Thurles. RPO 31 *Sustainable Place Framework* of the RSES supports this approach, promoting the development of quality places through integrated planning and consistently excellent design. In addition RPO 34 *Regeneration, Brownfield and Infill Development* provides guidance on developing urban infill and brownfield sites. It is important that sites close to or within the town centre are developed in line with these principles.

The SRA also commends the continued development of public realm and wayfinding projects prioritising walking and cycling movements and pedestrian space over car parking including the Liberty Square Enhancement Plan and Thurles Market Quarter. The approach of adopting the 10 Minute Town Concept in accordance with the SRA's *10 Minute Towns Accessibility & Framework Report* is welcomed, where short travel time and ease of access via sustainable travel modes is achieved between where we live, work, access services, access recreation and amenity.

In terms of compact growth targets, NPO 3c of the NPF and RPO 35 *Support for Compact Growth* of the RSES state that 30% of all new homes should be located within the existing built-up footprint of the settlement, which is defined as the CSO urban settlement boundary. Section 5.2.1 of the Draft Plan states that it is expected that more than 30% of new population growth will occur in the area zoned *Urban Core* and *Regeneration* (and the neighbourhoods adjoining the town centre) with a focus on higher density, well connected and high-quality urban housing.

The Draft Plan sets out a requirement for approximately 39.4 ha. of serviced/serviceable residential lands by 2030 which accords with the figures for Nenagh set out in Table 2.4 *Core Strategy Table* of the Development Plan. However it is noted that the quantum of land zoned *New Residential* is stated as 48.19 ha. This is in addition to the land zoned Urban Core (39.99 ha. with a 30% residential share); and Regeneration (1.02 ha. with a 30% residential share), as well as Strategic Reserve (20.60 ha., for long term strategic and sustainable development to deliver housing within the subsequent development plan period). To ensure consistency with the Core Strategy of the Development Plan, the amount of land zoned should be in line with the amount required as per the Development Plan methodology and clarification is sought on this point. This would also ensure that the plan aligns with its objectives of compact and sequential growth, embracing the Town Centre First approach.

It is noted that a residential density figure of 25 dph is used to apply to all lands where residential use is permitted, including the residential share of lands zoned Urban Core and

Regeneration. However higher density targets should be considered particularly for sites within the town centre and close to public transport services. This would reflect the importance of Thurles as a Key Town and align with the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)* (2009), which promotes higher densities for cities and larger towns (including towns with 5,000 or more people). It should also be noted that the *Sustainable and Compact Settlements Guidelines for Planning Authorities (2023)*, which is currently at draft, public consultation stage, state that residential densities in the range of: 40-150 dph (net) be applied in town centres; 30-50 dph (net) generally be applied in suburban and edge locations; and up to 80 dph (net) open for consideration at accessible urban locations in Key Towns. The *Good International Practice: minimum densities for 10-minute city and town neighbourhoods* example included in Section 3.9 *Placemaking* of the RSES, notes how international experience shows that the critical density at which a large portion of people will change to accessing services by foot and bicycle is approximately 10,000-12,500 people per square kilometre.

C: Economic Development and Enterprise

The SRA welcomes the inclusion of policies within the Draft Plan to promote Thurles as an employment centre and the economic potential of the designation of nearby Lisheen as a National Bioeconomy Campus. The potential for Thurles to be a driver of the bioeconomy, including bioenergy and bio-technology and as one of six designated sites within the EU for piloting the next generation of the bioeconomy is recognised. RPO 59 *National Bio-economy Hub in Lisheen* of the RSES supports the sustainable development of the Hub into a significant economic and employment driver. The Draft Plan also references the employment centre at Shannon Commercial Properties, Archerstown and range of services in the town including retail, agriculture, sports and education, which are considered key attributes for the town under the RSES. It also recognises that the town centre is a key employment location and that employment in the urban core will help support existing business in town. It recommends that high-density employment should be directed to the town centre in the first instance, as well as areas zoned 'Mixed Use' and 'Regeneration'. In line with the Town Centre First Approach, it is important that sites close to the town centre are prioritised so that people living in the town can walk or cycle or people travelling to the town for work could use public transport rather than promoting more car-dependent developments.

D Sustainable Transport and Mobility

The SRA welcomes the preparation of the Local Transport Plan for Thurles as part of the LAP process. 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 preparation of designs for an Active Travel Route for Thurles linking schools to the town centre and the train station so that a modal shift to walking and cycling is achieved for school and other trips, is also welcomed.

In terms of reducing traffic congestion within Thurles, the Draft Plan states that a design has been completed for the provision of an Inner Relief Road to link the N62, Horse and Jockey Road, with the N75, Two-Mile-Borris Road, which is included as a Key Infrastructural Requirement in the RSES, in addition to the upgrade of the R498 Nenagh to Thurles Road. RPO 167 *National Road Projects* references an upgrade to the N62 Horse and Jockey to Thurles Road to connect with M7 and M8. RPO 168 *Investment in Regional and Local Roads* supports the Thurles Relief Road and upgrade of the R498 Thurles to Nenagh.

E Climate Action and Sustainability

The SRA welcomes the inclusion of policies in the Draft Plan on tackling climate change and transition to a low carbon economy including nature-based solutions, natural heritage and blue/green infrastructure. This includes policies to protect and conserve the integrity and the ecological and biodiversity value of the River Suir as it runs through the town, supporting the completion of Thurles 'Looped River Walk' and supporting and working with the local community in the development of blue and green infrastructure in the town. This endorses the SRA's approach in promoting a Green and Liveable Region. 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 developing this concept. The proposal to provide new connections and linkages to enhance accessibility between existing residential areas and areas of public open space and recreation is also a welcome approach.

F Environmental Assessment

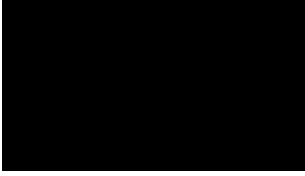
We note the preparation of Strategic Environmental Assessment (SEA) Reports, Natura Impact Report in support of the Appropriate Assessment (AA) and Strategic Flood Risk Assessment published alongside the Draft Plan. The Planning Authority should note that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Tipperary County Council review these documents to inform the Council's own environmental assessments and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final LAP where relevant.

Conclusion

The SRA welcomes the public consultation at draft stage for the preparation of a new Local Area Plan for Thurles.

Further engagement between the SRA as a key stakeholder and the Forward Planning Section of Tipperary County Council in the final phase of the Local Area Plan is encouraged. 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