



Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

20<sup>th</sup> April 2026

Proposed Variation No. 1,  
Planning Policy and Projects Unit,  
Tipperary County Council,  
Civic Offices,  
Nenagh,  
Co. Tipperary,  
E45 A099.

**Re: Proposed Variation No. 1 to the Tipperary County Development Plan 2022-  
2028**

A chara,

Thank you for your authority's work on preparing the Proposed Variation No. 1 (proposed Variation) to the Tipperary County Development Plan 2022-2028 (County Development Plan).

As Tipperary County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or

clarification regarding particular provisions of a plan on issues that are considered necessary to ensure alignment with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

## **Overview**

The proposed Variation includes a number of changes to the County Development Plan with regard to the implementation of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) including the following elements:

- revised core strategy;
- new policies and amendments;
- inclusion of zoning maps for Key Towns and District Towns; and
- amendments to zoning maps for 24 settlements.

The Office welcomes the updated core strategy tables (Table 2.4 and Table 2.5) and notes the quantum of new residential land to be zoned throughout the county, of which approximately 92 percent is available for housing development.

While the Office supports the proposed rezoning of land for residential development in separate locations across the county, the Office recommends that the approach to zoning in Cahir is reviewed to ensure that the new housing is delivered in appropriate locations that support compact and sequential growth.

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 County Development Plan, which will enable the sustainable growth of serviced settlements.

In relation to flood risk, the Office also recommends amendments to the Strategic Flood Risk Assessment (SFRA) to ensure that risk of flooding to people and property is avoided and managed and to ensure consistency with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within this context the submission below sets out two (2) recommendations under the following themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Residential zoned lands – Cahir</a>	<a href="#">Recommendation 1</a>	-
<a href="#">Flood risk management</a>	<a href="#">Recommendation 2</a>	-

### **1. Residential zoned lands – Cahir**

In relation to the zoning of additional lands for residential development in Cahir, the Office considers that the identified lands are generally well located.

However, the Office has concerns regarding site CH\_3, which is proposed to be rezoned from Agriculture to Strategic Reserve. This site is serviced, well located, and close to the town centre, making it suitable for residential development. The Office, therefore, encourages the Planning Authority to consider zoning these lands as New Residential to facilitate the delivery of housing in the short term.

In contrast, site CH\_7, which is located immediately to the north of the wastewater treatment plant, is proposed to be rezoned from Agriculture to New Residential. These lands are located further from the town centre and in an area otherwise zoned as Town Environs. Appendix 1: Serviced Land Assessment accompanying the proposed Variation identifies CH\_7 as inconsistent with the principles of compact growth and the sequential approach, and 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.

While ensuring that sufficient land is zoned to meet housing needs, zoning should prioritise centrally located lands to support compact and sequential growth and should be otherwise consistent with national and regional planning policy. As such,

the Office considers that the Planning Authority should review the opportunities for the selection of residential zoned land to ensure that new housing is delivered in appropriate locations that supports compact, sequential and sustainable growth, and in particular to consider zoning the CH\_3 lands as New Residential and not zoning CH\_7 without first considering the opportunities for zoning alternative more centrally located lands.

### Recommendation 1 - Compact and sustainable growth of Cahir

Having regard to the compact and sequential growth of Cahir and having considered:

- 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 in accordance with NPO 1 of the National Planning Framework First Revision (2025) (NPF) and the Flood Guidelines.

The Office welcomes 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 within Flood Zone A, and Town Environs is considered an appropriate zoning objective as it is water compatible. However, as

agricultural buildings (less vulnerable) are permitted in principle and residential uses (highly vulnerable) are open for consideration within the Town Environs zoning objective, the Office does not consider the zoning objective water compatible and recommends the zoning objective for site TM\_1 is amended to ensure the proposed Variation is materially consistent with the Flood Guidelines.

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, however it is not clear that land use zonings either side of these watercourses have been informed by this information. As such, the Planning Authority should review if stage 3 flood risk assessments are required to inform the land use zonings and the SFRA.

In addition, the Office considers that the mapped 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.

Finally, 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-base 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.

## Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58(11) of the Act must summarise these recommendations and how the Chief Executive proposes they should be dealt with.

Where a planning authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the Variation. Where your authority decides not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.


Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the National Transport Authority during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the County Development Plan as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

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**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015

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