



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

30th July 2026

Planning Policy and Projects Unit,
Tipperary County Council,
Civic Offices,
Nenagh,
Co. Tipperary
E45A099.

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

A chara,

Thank you for your authority's work in preparing the Material Alterations (material alterations) to the proposed Variation No. 1 (proposed Variation) of the Tipperary County Development Plan 2022-2028 (Development Plan).

As Tipperary County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Response to the Office's submission on the proposed Variation

The Office welcomes and commends the significant work undertaken by the Planning Authority to date and the material alterations in particular, in addressing the recommendations of the Office as expressed in its submission on the proposed Variation at draft stage.

In particular, the Office welcomes the Planning Authority's approach to reviewing residential lands at Cahir in response to Recommendation 1 of the Office's submission at draft stage. The Office commends the rezoning of site zoning CH_7 at MA 18 from New Residential to Town Environs and balancing this with the inclusion of a more centrally located zoning CH_3 at MA 17 which has been rezoned from Strategic Reserve to New Residential.

Furthermore, the Office welcomes the Planning Authority's positive approach in response to Recommendation 2 of the Office's submission at draft stage in respect of flood risk management, noting that all matters have been substantially addressed. The Office commends the inclusion of a clear and comprehensive review of points set out in appendix A of the updated Strategic Flood Risk Assessment (SFRA). In particular, the Office welcomes proposed amendment MA 20 to rezone TM_1 in Templemore from Town Environs to Amenity. This amendment will avoid zoning highly vulnerable uses in Flood Zone A locations to comply with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

Similarly, in response to climate change, the Office notes the updates to the SFRA at appendix 1 and particularly welcomes the rezoning of zoning site TT_6 at Tipperary Town from New Residential to Amenity at MA 11. This water compatible use mitigates flood risk identified through future scenario mapping and reflects a precautionary approach.

Also particularly noteworthy, is the Planning Authority's response to managing unmapped watercourses as part of the proposed Variation. For example, following stage 2 assessment, lands at TT_2 were rezoned from Strategic Reserve to Amenity due to their proximity to an open watercourse. The Office notes and welcomes the Planning Authority's commitment to produce Rainwater Management Plans and to

incorporate the requirements of the Nature-based Solutions and Sustainable urban Drainage Systems guidelines into the next Development Plan for County Tipperary.

2. Overview of submission on proposed material alterations

As set out above, the Office welcomes the proposed material alterations which positively respond to the recommendations made in its submission on the proposed Variation at draft stage.

Notwithstanding the above, the Office has concerns regarding a number of proposed New Residential zonings in Thurles, Tipperary Town and Cashel, particularly in respect of compact growth and sequential development and recommends that these be reviewed and rezoned. The Office further recommends the Planning Authority to address a potential conflict with a proposed New Residential zoning and the National Road Network at the N24 Cahir to Limerick Junction Scheme in Tipperary Town.

The Office also advises a review of a proposed Strategic Reserve zoning in Thurles affected by high end future scenario mapping, and a proposed Strategic Reserve zoning in Tipperary Town to include reference for the need to undertake a risk assessment should New Residential be zoned in future.

The recommendations and observation set out below are intended to support the Planning Authority in finalising the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Delivering sustainable communities and sequential growth	MA Recommendation 1	-
Flood risk management	-	MA Observation 1
National road network	MA Recommendation 2	-

3. Delivering sustainable communities and sequential growth

In respect to the zoning of additional lands for residential development as part of the material alterations stage, the Office considers that the majority of lands identified

are generally well located. The Office has, however, identified three sites which should be considered further.

In relation to Tipperary Town, the Office notes the proposed New Residential zoning of site TT_15 (MA 13), located on the northern edge of the town along the Tipperary Road. The Office further notes that the revised appendix 1: Serviced Land Assessment accompanying the material alterations identifies the site as inconsistent with the principles of compact growth and the sequential approach.

The site is located on the periphery of the settlement, on the northern edge of the town, and is physically separated from existing and planned residential neighbourhoods by lands that are predominantly zoned and developed for employment uses. As such, it does not appear to represent a logical extension of the town's residential areas, and its relationship to the wider pattern of planned growth is unclear. Given its location, it is not evident how the proposed residential zoning would support a compact, sequential and connected pattern of development, and there is potential for a more car-dependent form of development to arise.

Accordingly, the Office recommends that the Planning Authority reconsiders the proposed amendment to rezone the lands from employment to residential use, having regard to the availability of sufficient residentially zoned lands in more sequential, accessible and better-connected locations that are better positioned to support the sustainable and integrated growth of Tipperary Town.

The Office also has concerns that the proposals to rezone sites Thurles T_6 from Strategic Reserve to New Residential and Cashel CS_22 from Strategic Reserve/Employment to New Residential may be premature, as it is not yet clear how the lands will be comprehensively integrated with the wider settlement structure or supported by the necessary infrastructure and services. In particular, further consideration is required regarding how suitable access to these lands can be achieved and how development would connect to existing and planned walking, cycling and public transport networks. The Office is of the view that these lands would benefit from a more coordinated planning approach to identify appropriate access, transport connections, and open space provision, and to ensure that future development can be delivered in a coherent and sustainable manner. For these reasons, the Office considers that these lands should remain as Strategic Reserve,

particularly as sufficient lands have been zoned through the Variation process in Cashel and Thurles.

MA Recommendation 1 - Delivering sustainable communities and sequential growth

In order to deliver sequential growth and support the coordinated and sustainable development of communities, and having considered the following:

- NPO 9 of the NPF to ensure compact and sequential patterns of growth within settlements;
- NPO 43 of the NPF to prioritise the provision of homes at locations that can support sustainable development;
- the Climate Action and Low Carbon Development Act 2015, as amended mandatory target to reduce greenhouse gas emissions by 51%, the Climate Action Plan 2025 and associated actions including the national Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and National Investment Framework for Transport in Ireland (2021); and
- 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 makes the Variation without:

- (i) MA 5, Thurles T_6;
- (ii) MA 13, Tipperary Town TT_15;
- (iii) MA 15, Cashel CS_22.

4. Flood risk management

The Office notes the zoning amendment of T_5 in Thurles (MA 6) from Town Environs to New Residential. However, while the Planning Authority has applied the mid-range future scenario mapping extent to the zoning, the SFRA indicates that of high-end future scenario mapping should be applied to highly vulnerable development, including New Residential. As the high-end future scenario extents are

more extensive across the zoning, the Office advises that this matter should be reviewed by the Planning Authority.

Having regard to Unmapped Watercourses, the Office notes that zoning amendment TT_3 in Tipperary Town (MA 10) proposed to be rezoned from New Residential to Strategic Reserve has an unmapped watercourse in the vicinity. As set out in appendix A of the SFRA Addendum, a flood risk assessment would be required should these lands be zoned for development in the future. As such the Office advises that additional text be included in the zoning amendment in order to highlight this requirement.

MA Observation 1 - 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 requirement of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Planning Authority is advised to:

- (i) review zoning amendment of T_5 in Thurles at MA 6 and apply high end future scenario mapping extents to the zoning as required for proposed New Residential and take the precautionary approach as indicated in appendix A of the updated SFRA Addendum; and
- (ii) make a minor modification to add text to zoning amendment TT_3 in Tipperary Town at MA 10 to advise that should these lands be rezoned from Strategic Reserve to New Residential, an appropriate stage 3 flood risk assessment will be required as indicated in appendix A of the updated SFRA Addendum to address an unmapped watercourse in the vicinity.

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

5. National road network

A number of road upgrades and improvements are planned and proposed through the Tipperary County including the N24 Cahir to Limerick Junction Scheme. This National Road Scheme is included in the list of Major National Roads Projects scheduled to commence construction/procurement by 2030 in the National Development Plan Review 2025. The Office has identified a potential conflict at proposed alterations at TT_15 in Tipperary Town to rezone from Employment to New Residential which raises distinct planning considerations to that of the existing employment zones. Engagement with Transport Infrastructure Ireland is advised as part of this process to ensure that the proposed zoning does not constrain the delivery of the road scheme.

MA Recommendation 2 - National Road Network

Having regard to the need to maintain the carry capacity and safety of the strategic road network, including improvement, upgrading of the existing network and new routes, and having considered the following:

- section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012);
- RPO 140(b) of the RSES (maintaining the strategic capacity and safety of the national roads);
- RPO 151 of the RSES (protection of the strategic transport function of national roads); and
- RPO 167 of the RSES relating to National Roads Projects,

the Office recommends that the Planning Authority reviews MA 13 at zoning TT_15 in Tipperary Town and omit any areas of the proposed zoning objective that potentially conflict with the N24 Cahir to Limerick Junction Scheme proposed to commence construction by 2030.

The Planning Authority is advised to consult with Transport Infrastructure Ireland to address this recommendation.

6. Summary

The Office requests that the Planning Authority addresses the recommendations and observations set out above.

As part of this process, the Chief Executive's report to the elected members, prepared under section 58(15) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National Transport Authority during the plan preparation process within **one week** of adoption;
- inform the Office, **as soon as practicable**, where it decides not to comply with a recommendation, including the reasons for this decision; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015