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County Development Plan Review,
Planning Policy and Projects Unit,
Tipperary County Council,
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Nenagh,
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E45A099.

13th November 2020

**RE: Tipperary County Development Plan 2022-2028 Pre-Draft Consultation
SRA File Ref: 20/007**

A Chara,

The Southern Regional Assembly (SRA) welcomes the publication of the Tipperary County Development Plan 2022-2028 Pre-Draft consultation Issues Paper document and the opportunity to consult with the Council under Section 11 of the Planning and Development Act 2000.

The SRA makes this observation in accordance with Section 27 A of the Act which obliges the Regional Assembly to make submissions or observations regarding a number of matters including:

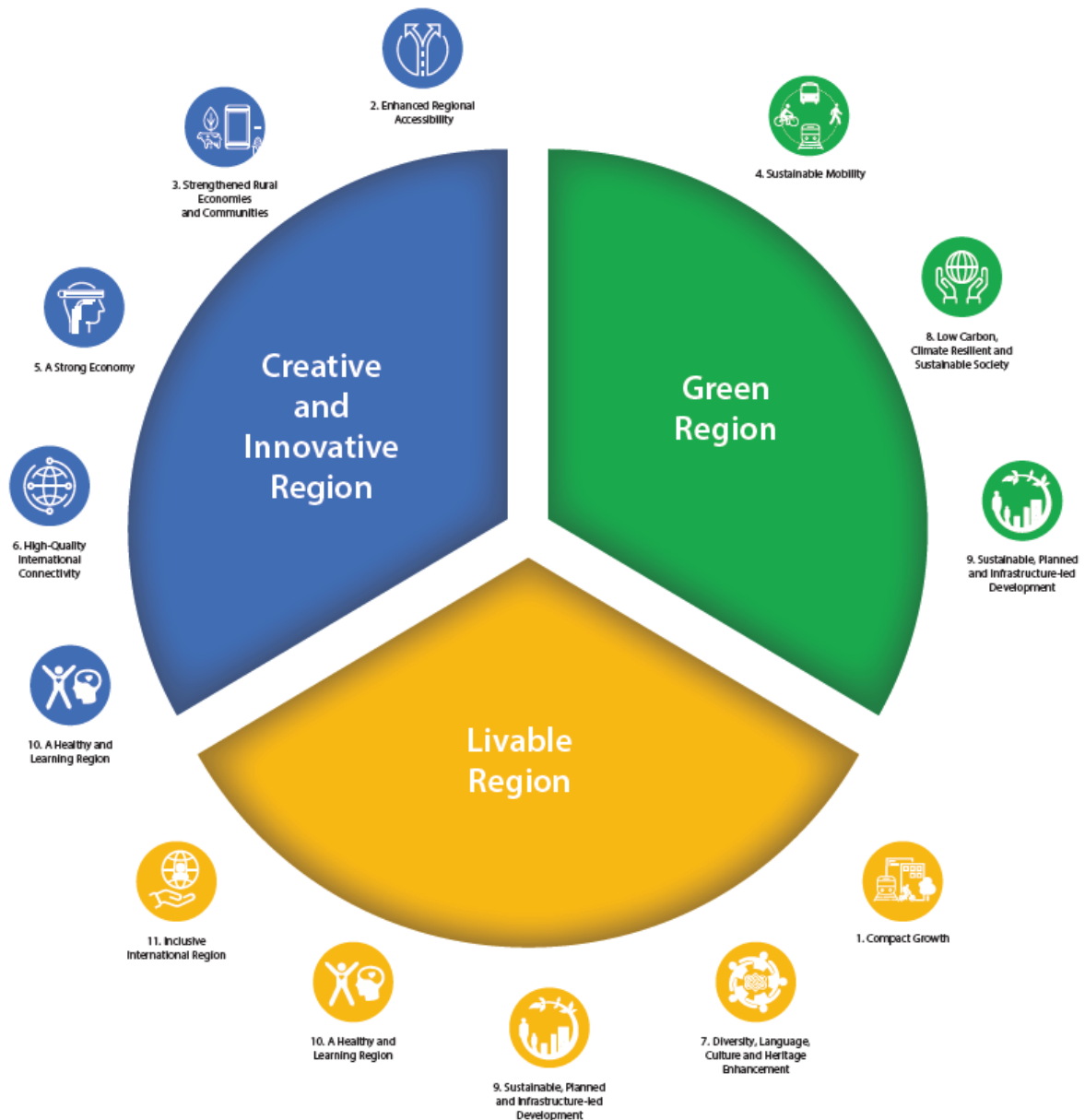
- Policies and objectives in relation to national and regional population targets.
- Distribution of residential development and related employment with a view to:
 - Promoting consistency as far as possible between housing, settlement and economic objectives of the Draft Plan, Core Strategy and RSES.
 - Assisting in the drafting of the Core Strategy of the Draft Development Plan.
- Objectives of providing physical, economic or social infrastructure in a manner that promotes regional development through maximising the potential of the Region.
- Planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services.
- Collaboration between the planning authority and the Regional Assembly in respect of integrated planning for transport and land use and the promotion of sustainable transport strategies in urban and rural areas.
- Promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to Climate Change.

The opportunity to engage with Tipperary County Council through the pre-draft phase of the process is also important in relation to Section 22 (A) (3) of the Act which requires that public bodies (including local authorities) consult with the Regional Assemblies, as appropriate, when preparing its own strategies, plans and programmes to ensure that they are consistent, as far as practicable, with national and regional objectives set out in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). Continued collaboration throughout plan development is welcomed. The RSES was made on the 31st January 2020.

1.0 Overall Observations

The Tipperary County Development Plan 2022-2028 is pivotal to achieving the step change required by national and regional policy for Tipperary to fulfil its potential. The Development Plan will be critical in establishing this direction of change, embedding the pathway for transition to compact growth and delivering on targets and strategic infrastructure. The SRA commend the quality of the publication and at this stage of the process, the SRA intend to outline high level points and issues.

Chapter 2: Strategic Vision sets out the strategic vision and overall strategy for the RSES. Section 2.2 and the associated Strategy Statements and Key Enablers are particularly relevant for the Development Plan. The RSES provides a vision for the development of the Southern Region to become one of Europe's most **Creative and Innovative**, **Greenest** and **Livable** regions.



The RSES combines our international and national commitments with regional development priorities in 11 Strategy Statements to deliver the vision for the Region:



A key component of the RSES strategy is to strengthen the settlement structure of the Region and to capitalise on the individual and collective strengths of our three cities, our metropolitan areas, and our strong network of Key Towns, towns, villages and rural communities.

The RSES should be consulted and appropriately referenced across the themes covered in the Issues Paper as the Council moves to preparation of a Draft Development Plan. The RSES is available through the following link:

<http://www.southernassembly.ie/regional-planning/regional-spatial-and-economic-strategy>

2.0 Low Carbon Society and Climate Action

The direction of change is clear from the Issues Paper which addresses *Low Carbon Society and Climate Action* as the first issue which will affect ‘how we work, live, travel and access services.’ This is welcomed and should be reinforced in the Draft Development Plan as in the RSES, which places a priority on Climate Action as part of the strategic vision for the Region.

The Issues Paper recognises that the Development Plan will need to include measures to meet the national target of zero greenhouse gas emissions by 2050. Climate Action will impact many of the policies and objectives in the Draft Development Plan including flood risk management and surface water drainage, settlement strategy, transport, waste management, water services, energy, natural heritage, green and blue infrastructure. This cross-cutting approach should be reflected in the Draft Development Plan including appropriate adaptation or climate proofing measures.

National Climate Policy is demanding of all sectors to deliver transformative and innovative climate responses to:

- a) build resilience to now inevitable effects of climate change (adaptation) and reduce the vulnerability of the State to the negative impacts of climate change.
- b) support the radical reduction of emissions and demand for energy and to deliver a scale up in emission performance across all sectors, to help support the obligations of the State to meet prescribed targets and transition objectives over the coming decade to 2030, setting a trajectory to net zero emissions by 2050.

In addition to the provisions of the RSES on Climate Action, appropriate account should be taken of National Climate Policy to ensure appropriate local level policy/objectives enable the achievement of sectoral targets that will work towards the broader national transition objectives.

Climate Action is a cross-cutting consideration with an extensive scope beyond specific Climate Action measures. This includes support for compact growth and regeneration, support for renewable energy sectors, transition of traditional sectors - especially in energy, agriculture and manufacturing - retrofitting our buildings, support for sustainable mobility, measures supporting carbon sequestration, support for the circular economy, biodiversity enhancement and ecosystems services approaches, support for Blue Green Infrastructure, Nature-Based Solutions and flood risk management. A focus on enabling communities to engage in positive Climate Action should also be promoted.

The RSES recognises the need to climate proof our settlements, our built assets and our strategic infrastructure from the impacts of climate change, including severe weather events - such as flooding and coastal erosion - that continue to cause significant disruption to our economy, our society and essential services. The integration of Blue Green Infrastructure (BGI) and Nature-Based Solutions (NBS) into policy formulation and project planning offers opportunities to reduce costs, enhance utilisation of existing infrastructure while creating a climate resilient economy. For example, the integration of Sustainable Drainage Systems (SuDS) will better manage surface water which creates greater capacity in wastewater treatment infrastructure. Stakeholder engagement through the SRAs role on the EU Interreg Europe [Blue Green City project](#) has found that there are significant gaps in know-how and practical application of BGI and NBS at a local level and it is recommended that the Development Plan includes a policy response in this regard.

The RSES advocates for greater economic and sectoral diversification, particularly in rural areas where it has been shown that many towns and villages are vulnerable to the effects of economic changes and shocks such as COVID-19 restrictions. The transition to a low carbon economy can offer significant opportunities to achieve sectoral diversification in these areas. Tipperary County Council has long recognised the importance of the low carbon energy transition, both to the quality of lives of citizens and the opportunities it brings in terms of rural economic growth and development. This is recognised by the RSES and is detailed in a case study “*Tipperary, the Low Carbon Energy Transition and the Bio-*

economy". Tipperary is at the heart of the global bio-economy opportunity and is designated as a 'European Model Demonstrator Region'. In addition, the location of the National Bio-Economy Campus is at Lisheen and RPO 59 of the RSES provides strong policy support:

"It is an objective to support the sustainable development of the Lisheen Bio-economy Hub site into a significant economic and employment driver with the potential to significantly contribute towards meeting Ireland's climate change targets as a strategic site of European significance. Such initiatives as the Lisheen site shall be subject to robust environmental assessment including Flood Risk Assessment (if required) and satisfy AA requirements so as to avoid adverse effects on the integrity of European Sites."

The Issue Paper reflects the economic, societal and environment opportunities for Tipperary through the move towards a low carbon future. The RSES strongly supports this emphasis and the Development Plan should build on this strong platform including policy support for the work of research and development, centres of excellence in the green economy and pilot projects. Details of how the National Bio-Economy Campus is at Lisheen will meet the ambition of RPO 59 and develop into a significant economic and employment driver should be provided in the Development Plan.

A strong body of work has been established by Tipperary's *Climate Adaptation Strategy 2019-2024*. The SRA recommends the inclusion of policies and objectives to reflect this strategy, ongoing Climate Action work by the local authority at local and community levels and the Climate Action priority areas set out in Chapter 5 of RSES for decarbonisation, climate resilience and resource efficiency.

The Draft Development Plan should also provide policy support for the work of the Climate Action Regional Offices (CAROs). This will align with RSES support to the role of CAROs under RSES RPO 88 which states the objective to ensure effective co-ordination of Climate Action with the and local authorities to implement the Climate Action Plan and the National Adaptation Framework.

The Southern Regional Assembly in association with the Eastern and Midlands and Atlantic Seaboard South CAROs will host on-line workshops concerning the effective integration of Climate Action policies and objectives into the spatial planning decision making process. This will assist local authorities in implementing our national, regional and local commitments to transition to a lower carbon and climate resilient society and economy.

3.0 People and Places

Chapter 3: People and Places provides the regional settlement strategy. We refer in particular to *Section 3.2: Sustainable Place Framework* and *Section 3.3: A Tailored Approach* and the settlement typology set out in Table 3.2 including:

1. Cities and Metropolitan Areas
2. Key Towns – Section 3.5 (including Clonmel, Thurles and Nenagh)
3. Towns and Villages – Section 3.6
4. Rural Areas – Section 3.7
5. Networks – Section 3.8.

Achieving compact growth is a central theme of the RSES. This means that 30% of all new homes targeted for settlements outside of the cities must be within their existing built up footprints. This level of growth presents both a significant opportunity and a challenge.

Growth targets for each local authority are set to 2031 and require a framework to put actions into practice. For this reason, the RSES focuses on:

- **Strong Collaboration:** Potential networks are identified to encourage cross boundary collaboration.
- **Flexible Framework:** Flexibility is enabled to seek evidence based and tailor-made growth responses by each local authority for different places. Important principles are set for local authorities to follow when determining the allocation, scale and phasing of growth.
- **Transitional Change and Infrastructure Delivery:** The RSES recognises that the level of change required to meet targets cannot be achieved immediately. It will require several RSES/Development Plan cycles and lead-in time for providing infrastructure to achieve the targets to 2040. A strong emphasis is therefore placed on funding mechanisms and holistic approaches to delivering integrated infrastructure packages for our settlements (physical, social, environmental inter alia).

The Core Strategy will be a key element in the Draft Development plan to determine the hierarchy of settlements and appropriate growth rates for the County. The RSES requirements relating to the Core Strategy are set out in Section 3.3 of the RSES and include Regional Policy Objectives (RPOs) such as *RPO 2: Planning for Diverse Areas*, *RPO 3: Local Authority Core Strategies* and *RPO 5: Population Growth and Environmental Criteria*.

New national guidelines for rural housing and development plans are awaited and will provide an important input to preparation of the Draft Development Plan when published together with a Housing Needs Demand Assessment (HNDA).

3.1 Key Towns of Clonmel, Nenagh and Thurles

Fourteen Key Town are identified in the RSES that reflect the differing urban structure across our Region. Three Key Towns are identified in Tipperary County – Clonmel, Nenagh, Thurles - and this needs to find strong expression in the new Development Plan.

Tipperary's three Key Towns will play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. While local authorities are supported in targeting growth of more than 30% in Key Towns subject to capacity analysis, it is important to note that the nature, scale and phasing of growth of each Key Town will be determined by local authorities through the Core Strategy. In this regard, local authority initiatives to deliver infrastructure led development and retrofit physical and social infrastructure are critical to improving the quality of life for existing communities.

The *Settlement and Population Background Paper* recognises that a distinction is made for Clonmel as one of the larger Key Towns in the Southern Region. *Section 3.5: Key Towns* of the RSES states:

“These Key Towns are self-sustaining regional drivers and have a comparable structure to the five regional growth centres identified in the NPF.”

The Draft Plan and Core Strategy should reflect NPF and RSES priorities by positioning Clonmel so as to develop its role as a self-sustaining regional driver within the Southern Region and Nenagh and Thurles in their roles as strategically located urban centres with significant sub-regional roles and influence.

Through the RSES, Irish Water (IW) Investment Plans must align with the objectives and settlement strategy of the RSES and assist the strategic role played by Key Towns. Collaboration is required between IW and local authorities to agree phasing, water and wastewater services to accommodate growth in a phased, sustainable manner. Subject to capacity analysis, *Section 3.5* of the RSES states that some Key Towns may justify significant growth while others may place a greater emphasis on strengthened services, facilities and economic roles.

The Issues Paper and Background Papers provide a strong narrative on strengthening the linkages to the three Metropolitan Areas of the Southern Region and on enhancing the important role of towns and villages. However, the proposed policy approach towards Key Towns is unclear as narrative has not been developed to the same extent. This will need to be significantly enhanced and strengthened in the Draft Development Plan. The specific relationships, synergies and collective proposition of the three Key Towns should be explored. This should also be expanded to other settlements and relevant Metropolitan Areas.

3.2 Towns and Villages

The distribution of growth across the County’s other towns, villages and rural areas is a matter for the Development Plan to address. The RSES does however seek prioritisation (see *Section 3.6: Towns and Villages*) in the growth allocation for settlements informed by guiding principles as set out under RSES *Section 3.3. A Tailored Approach*.

The RSES recognises that towns and villages are the local drivers for their surrounding areas and a sustainable, infrastructure-led growth approach is encouraged at the appropriate scale. RPO 26 specifically relates to towns and villages. Part (d) of RPO 26 states:

“Local authorities will identify settlements which can play an enhanced role at sub-regional level to drive the development of their area;”

Section 3.3: A Tailored Approach states that when allocating for future growth in the Core Strategy of each Development Plan, local authorities will have regard to the RSES settlement typology and apply the following guiding principles:

- Scale of population and its existing performance;
- Extent to which a settlement is located inside or outside one of the three defined Metropolitan areas
- Scale of employment provision, number of jobs, jobs-to-resident workers ratio and net commuting flows.
- Compliance with NPO 72 of the NPF.
- Linking Core Strategies to an evidence base on the availability and deliverability of lands within the existing built up footprints.
- Extent of local services and amenities provided.
- Rate and pace of past development and the extent to which there are outstanding requirements for infrastructure and amenities
- Extent to which sustainable modes of travel can be encouraged.
- Accessibility and influence in a regional and sub-regional context.

- Sub-regional interdependencies
- Accessibility as a service centre for remote and long-distance rural hinterlands.
- Track record of performance and delivery, as well as ambition and scope to leverage investment
- Environmental and infrastructure constraints.
- The appropriate density and scale of development relative to the settlement and location.
- Need for attractive, alternative options to rural housing within smaller towns and villages.

Section 3.6 of the RSES states that Development Plans should include appropriate guidance for new homes in small towns and villages and renewal initiatives to assist an evidence-based approach to identifying appropriate sites for housing, social and physical infrastructure, including water and wastewater infrastructure. The ‘Cluster Guidelines’ prepared by Tipperary County Council are acknowledged within the RSES as an example of good practice. This will assist in providing a sustainable measure for villages renewal outcomes

The Issues Paper makes the important link between Tipperary and its settlements to the wider economic performance of the Region and connections to the cities of Cork, Limerick and Waterford. The Issues Paper also sets out the importance of the growth of these cities to achieve NPF objective of balanced regional development. The Development Plan should also address and develop the opportunities for specific relationships and synergies with between settlements and Tipperary’s three Key Towns. To ensure consistency in the use of terms, the references to “Regional Cities” should be changed to the updated terminology used in the RSES e.g. “Metropolitan Areas” or “Cities”.

The Issues Paper and supporting background papers have a strong and positive focus on creating quality places and more sustainable communities. This is strongly supported and aligns with the Sustainable Place Framework of the RSES (see RPO 31).

3.3 Rural Areas

The RSES strongly supports the development of our rural areas, and Chapter 3 recognises the decline of population and services in many of our smaller settlements as a problem of strategic national and regional importance and acknowledges the need for investment to reverse decline and attract population and enterprise growth.

Section 3.7: Rural Areas of the RSES states that Core Strategies in Development Plans should identify areas under strong urban influence in the hinterlands of settlements. They will set an appropriate rural housing policy response to avoid ribbon and over-spill development from urban areas, support revitalised towns and villages, achieve sustainable compact growth targets and protect the rural resource for rural communities, including people with an established local connection to the area and relevant policy is set out in RPO 27. This facilitates the needs of rural communities, whilst controlling pressures for urban-influenced housing demand. Updated national guidance is anticipated.

The importance of our rural areas is highlighted throughout the RSES including for example rural economic development (see Section 4.5), and rural connectivity (see Section 6.3 and RPOs 158 and 172). Various parts of our rural Region have different requirements requiring local customised responses, but all require greater economic diversity and innovation to ensure resilience.

The Issues Paper takes a positive approach in supporting the towns and villages as the backbone to the social and rural fabric of Tipperary. Placemaking and regeneration are prominent and are advocated throughout the Issues Paper. The vision for town and village centres as sought-after commercial and cultural hubs with sustainable living opportunities for all types of families is particularly welcomed and supported.

2.4 Networks

The RSES recognises that's when settlements combine their similar economic strengths and specialisms it provides strategic opportunities to drive the regional economy. These networks present opportunities for collaborative projects and shared benefits from strategic infrastructure investments, particularly from improved inter-regional connectivity (transport networks and digital communications).

Chapter 3 and 4 identify the importance of networks, with examples of settlements sharing assets and collaborating to drive economic growth. From a Development Plan perspective, it is important to note that while the RSES process has identified the potential for collaboration actions, a commitment to deliver is required at a local level if opportunities are to be realised.

The Limerick-Waterford Transport and Economic network/axis is a potential network that is relevant to Tipperary. This potential network along a strategic east-west axis across the Region links the cities of Limerick and Waterford, the Atlantic Economic Corridor and Eastern Corridor and includes Clonmel, Carrick-on-Suir, Cahir and Tipperary Town. Early initiatives along this axis include the River Suir Blueway.

The RSES also identifies the economic role played by smaller scaled settlements for their surrounding rural hinterlands and the opportunities for sharing assets and opportunities (see RPOs 28, 29 and 30) between different settlements to drive rural economic growth. The Issues Paper also identifies this opportunity and the SRA supports initiatives through the Development Plan to harness the potential of such networks.

3.4 Compact Growth and Regeneration

Compact growth and regeneration are cross-cutting themes for settlements of all sizes. The RSES seeks a dynamic Development Plan approach to achieve Core Strategy growth targets. *Section 3.11: Regeneration* states that the regeneration and development of urban brownfield and infill sites to achieve higher density populations will need to be a priority for local authority plans, with a focus given to mixed-use developments for vibrant living and working urban centres.

In relation to Key Towns and other towns and settlements, RPO 35 (c) states:

“Development Plans shall set out a transitional minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs, within their existing built up footprints in accordance with NPF National Policy Objective 3c. This will be evidence based on availability and deliverability of lands within the existing built up footprints.”

RPO 34: Regeneration, Brownfield and Infill Development states that, in pursuit of the NPF's NPO 3a, 3b and 3c, the Development Plan Core Strategy should be accompanied by specific objectives setting out the achievement of urban infill/ brownfield development. Considerations for brownfield site remediation are provided by RPO 34.

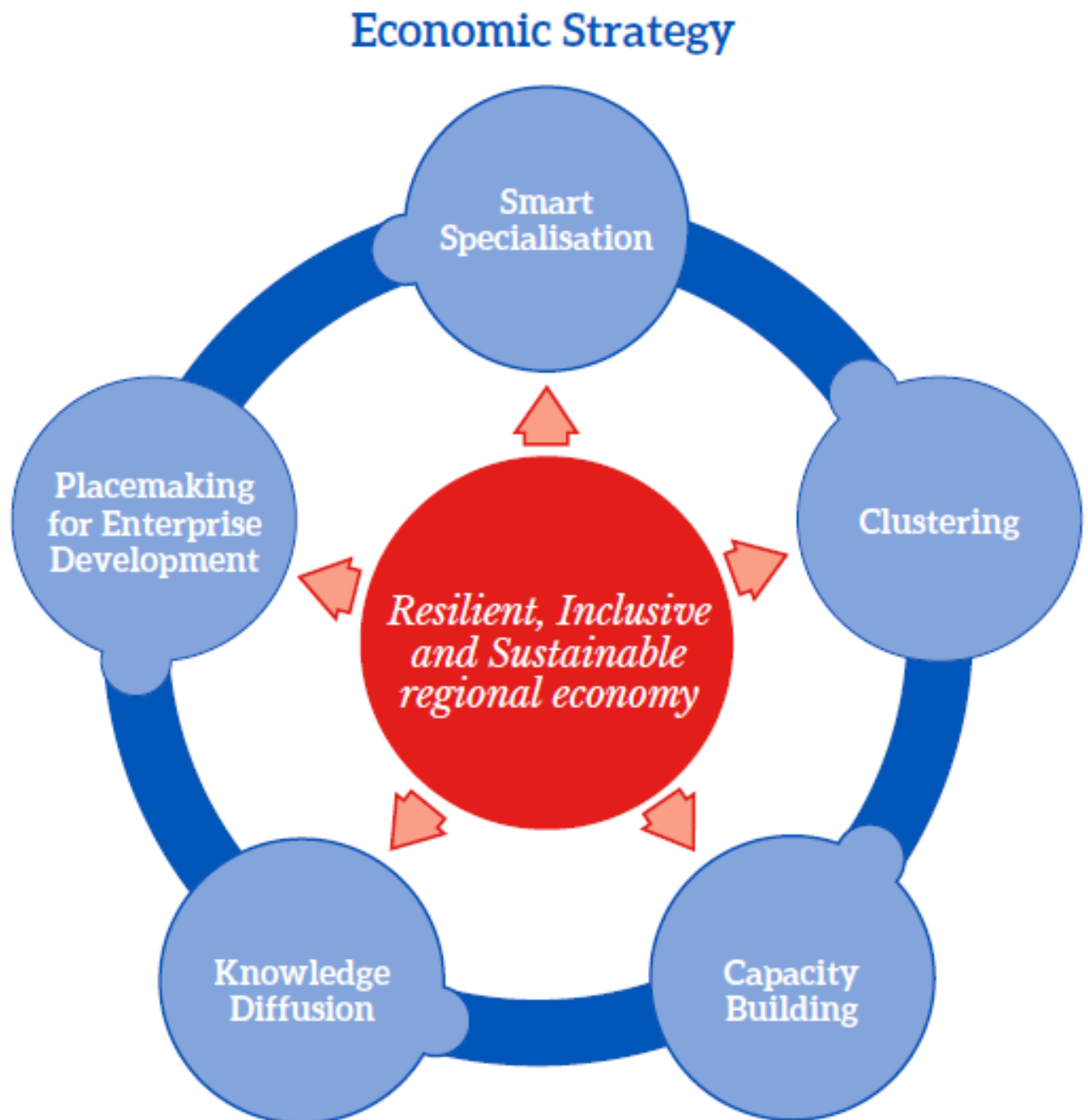
The RSES recognises that infill and brownfield development is complex. In this regard, active land management initiatives are supported through *RPO 37: Active Land Management* while the work of the Land Development Agency is supported in RPO 36. Collaboration is required between Irish Water (IW) and the local authorities to agree phasing, water and wastewater services to accommodate growth in a phased, sustainable manner.

4.0 Economic Development and Employment

Chapter 4: A Strong Economy Innovation and Smart provides a 'regionalisation' of national economic policy. The RSES states that our Region needs to transform our enterprise base through diversification and innovation for longer term resilience while managing potential vulnerabilities.

4.1 Economic Strategy

Five economic principles are contained in RSES economic strategy and these should be reflected and integrated into the Development Plan:



1. **Placemaking** will be instrumental to ensuring that Tipperary retains and attracts sufficient human capital and talent.
2. **Capacity Building** is required to bid for and win competitive funds and to ensure successful implementation of the Development Plan. The key message of the RSES is for all local authorities and relevant agencies to ensure they have capacity to identify funding resources for implementation and this should be reflected in the formulation of the Draft Development Plan.
3. The full scope of future work and skills required for our economy remains unknown. Creating the culture of learning through **Knowledge Diffusion** and the creation of a Learning Region are essential to securing greater economic resilience. The RSES promotes the establishment of a Learning Region which will build our skill base. Encouraging collaboration between higher education institutes, the Regional Skills Fora and the Educational and Training Boards presents the potential to develop skills and knowledge in areas most exposed to technological disruption. By supporting community and education providers, Tipperary can ensure that knowledge and skills are spread to all citizens to help address skills shortages and lifelong learning challenges
4. The RSES states that it is important that an enterprise-friendly ecosystem is facilitated, including skills-matching, collaborations between government, industry, higher education and communities. **Smart Specialisation** will play a central role as it brings together key stakeholders to identify the competitive advantages of an area with the view of developing economic opportunities.
5. Fostering modern **Clustering** policies is a strong feature of the Region's economic strategy. The Mid-West Skills Forum has been particularly successful in establishing clustering initiatives and this should be reflected in the Draft Development Plan.

4.2 Economic Drivers

The Issues Paper places a welcomed emphasis on placemaking to drive the economy. Placemaking will create conditions necessary for sustaining jobs and competitive advantages, while increasing the attractiveness of Tipperary as a location to work, live and invest. Key infrastructural requirements have been provided for all of Tipperary's Key Towns in Chapter 3 of the RSES and these should be considered in the Development Plan. In addition, *RPO 11: Key Towns* states that it is an objective to:

“support and promote placemaking in all Key Towns to include public realm regeneration and urban renewal initiatives and public private partnership approaches for town centre regeneration”

Section 4.8 of the RSES states that with the introduction of competitive bids as part of Project Ireland 2040 and similar frameworks to access funds from sources such as EU programmes, there is a need to ensure that all local authorities and local stakeholders have sufficient capacity to identify funding sources and to prepare professional and robust applications. The Issues Paper encourages a collaborative process to drive transformation projects. This approach is welcomed and is consistent with the RSES economic strategy.

Developing the economic potential of Tipperary's three Key Towns, towns and villages will provide the economic catalysis for rural areas. *Section 4.5: Rural Development* states that sustainable rural communities are dependent on viable and vibrant towns and villages. Various parts of rural Tipperary have different requirements requiring local customised responses, but all require greater economic diversity and innovation to ensure resilience. Section 4.5 and RPOs 43 to 50 set out key policy areas

to support rural development including the need for digital and physical infrastructure and polices. Good practice examples are cited which may offer policy solutions and responses in the Draft Development Plan. Cross boundary co-operation within our Region to address similar problems is a key theme of the RSES and this may be explored further through the Development Plan process

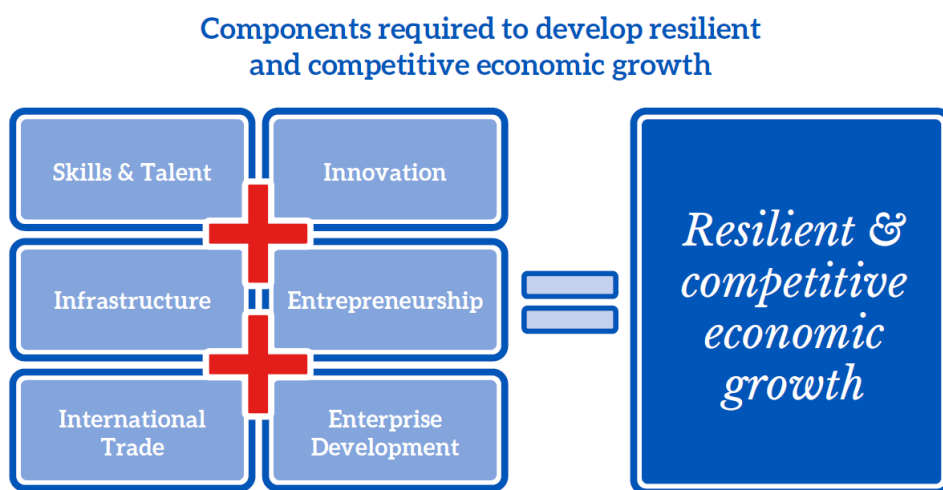
4.3 Sector Development Opportunities

Particular industries have place-specific needs, such as proximity to high-energy services infrastructure, water capacity, availability of employees, proximity to public transport, access to international markets through airports and ports, and serviced lands. Section 4.6 of the RSES states that these issues should be considered in Development Plans.

The Issues Paper states that a reimagination of towns and village centres is required. The RSES champions innovation in the retail sector in response to changing patterns of activity, including online retail. The retail business model is evolving in a digital direction and therefore retail should be at the centre of any digital strategies developed by local authorities. A settlement centre should attract consumers by offering a unique retail experience and to evolve in line with data about shopping preferences and behaviour. The RSES supports mechanisms to support traditional retailers in the transition to technology led, experiential retail models.

The Issues Paper and Economy and Employment Background Paper are strong in accentuating the opportunities for Tipperary in a move toward a low-carbon economy. Section 4.6 of the RSES recognises that the transition to a low carbon future will see entire sectors of the economy undergo radical changes which will create new types of enterprises and jobs. The Development Plan process provides the opportunity to explore the required investment in new skills, as well as appropriate assistance and incentives to enable enterprise to make the transition.

It is important given the rapid evolution of the economy that Tipperary has the capacity to adapt to emerging trends. New sectors are constantly emerging and policy approach of the Development Plan should be flexible to allow adaption to emerging sectors. Section 4.6 of the RSES supports enterprise transitions to Industry 4.0 and equipping people with the necessary skills to adjust and adapt to technology changes and disruptions, while creating an enterprise ecosystem that promotes innovation and entrepreneurship in emerging opportunities. This will improve competitiveness and resilience which are in turn underpinned by skills development, innovation capacity, trade and competition, and infrastructure investment.



The delivery of actions under Mid-West Regional Enterprise Plan and Mid-West Regional Skills Forum are important and should be supported through the Draft Development Plan.

4.4 Regional Economic Analysis Reports

The three Regional Assemblies have published the [COVID 19 Regional Economic Analysis](#) to inform policymakers at a local, regional and national level of the extent of economic exposure and resilience across Ireland. This is consistent with the key principal of building economic resilience as supported in the RSES (*RPO 75: Anticipating Economic Structural Changes*).

This report developed a COVID-19 Exposure Ratio which represents the total number of its commercial units that were operating in the sectors likely to be worst affected by the COVID-19 outbreak, as a proportion of its total commercial stock as of September 2019. The higher this ratio is for an area, the more likely this area is exposed to significant economic disruption.

The report shows Tipperary County has a relatively low “COVID-19 Exposure Ratio”, with 46.1% of its commercial units operating in the sectors likely to be worst affected. The report indicated an Exposure Ratio of 48.7% for Clonmel, 45.9% for Nenagh and 45.2% for Thurles. The economic impact of COVID-19 will have far reaching implications and the ability of policymakers to use an evidence-based approach in identifying the exposure, resilience and appropriate responses is critically important.

The three Regional Assemblies have also published a [Regional Co-Working Analysis](#) report. Providing a wide range of options will attract highly skilled workers and retain them in our regions. With remote working very much becoming part of normal working patterns in certain sectors, this potential has gained significant traction and attention since the outbreak of COVID-19. To help fully understand this potential, the Regional Assemblies have taken an important step in building a stronger evidence-based approach through the Regional Co-Working Analysis report.

The report provides a stocktaking exercise on the number of private sector workers capable of operating remotely at regional and county level. The degree to which regions can capitalise on the potential of remote working will depend on a variety of factors - including but not limited to - the quality and strategic location of co-working hubs available. To explore this further, the three Regional Assemblies of Ireland have – through desktop research and consultations with Local Enterprise Offices – embarked on identifying co-working hubs throughout the country. Based on the information available to date there does appear to be scope for enhancement of co-working infrastructure in Tipperary.

In Tipperary County the estimated number of private sector workers capable of operating remotely, as of Q2 2020¹, is 6,396. De-coupling dependency from daily commuting over long distances can enhance the quality of life, reduce environmental impacts and support more sustainable business practices. This will assist in sustaining our capacity for growth, realising RSES and Project Ireland 2040 policy objectives, and help prepare for a more Climate resilient future.

¹ Regional Assemblies of Ireland calculations using data from the CSO’s Q2 2020 Labour Force Survey / Census 2016. See Regional Co-Working Analysis for further details.

5.0 Environment

There is a strong environmental theme running throughout the Issues Paper and Background Papers *Chapter 5: Environment* of the RSES integrates sustainable economic and social development with the protection and enhancement of the natural environment. The vision is of social progress and prosperity that will be advanced by sustainable policies and objectives for developing a quality human environment and living conditions consistent with respect for the natural environment. The Issues Paper has embraced this approach and the Regional Assembly looks forward to its elaboration and evolution in the Development Plan process.

The RSES recognises that our economy and society are wholly dependent on the resources and services provided by the natural environment. A high-quality environment enhances our well-being and quality of life. It also offers a strategic competitive advantage in attracting enterprise and encouraging economic activity in the Region. This is a key competitive advantage for Tipperary and one which can be further enhanced through a strong policy approach.

The RSES recognises that a policy approach based solely on environmental protection and conservation will not suffice and emphasizes that the factors of environmental progress are assembled around local economic and social motivation. The RSES promotes the recognition of 'services' provided by the natural environment in Section 5.2, where the term 'ecosystem services' is applied to the benefits derived from our ecosystem. The integration of ecosystem services into the preparation of the Draft Development Plan as per RPO 110 will be an important tool in this regard.

An advanced approach is payments for ecosystem services and examples of the Burren Programme, river restoration projects and Upstream Thinking in the UK are provided in Chapter 5. These approaches have assisted in diversifying the rural economy and creating greater economic and environmental resilience, all of which are important themes in the RSES. There are a growing number of examples of these initiatives in our Region, particularly agri-environmental schemes and projects funded under the European Partnerships Initiative (EIP). The Mulkear River Catchment Project is an example. An ecosystem services approach can ascertain what services and benefits are likely to accrue from an action or project. This can assist decision-making. Societal issues can also be tackled in such an approach e.g. the agri-environmental schemes provide a significant source of alternative income for a rural economy. This would possibly be an aspect to investigate through the Development Plan process and a policy response may emerge.

The SRA welcome the emphasis on Blue Green Infrastructure (BGI) in the Issues Paper and recommends expanding this concept to include Nature-Based Solutions (NBS) in the Draft Development Plan. Benefits are wide ranging and include (inter alia) food production, enhanced property values, health, climate change mitigation and adaptation, more effective management of urban flood risk, improved access, additional and more useable public open space, and improved biodiversity. It therefore affects the quality of life for everyone. It helps to define a sense of place and the character of our communities; provides important spaces for recreation with associated health and wellbeing benefits and strengthens the resilience of our natural environment to change. Protecting these assets and enhancing the benefits that they provide is integral to the future.

The RSES promotes the guidance document, *Planning for Watercourses in the Urban Environment* published by Inland Fisheries Ireland which provides an integrated watercourse protection strategy. RSES also states that spatial planning can play a significant role in ensuring that the design of developments prevent and reduce diffuse pollution, including the use of Sustainable Drainage Systems (SuDS). Development Plan policies that support these good practices are strongly encouraged.

6.0 Connectivity, Transport and Infrastructure

6.1 Digital Connectivity

Digital infrastructure and smart technologies are critical enablers for economic and social revitalisation. Enhanced quality and provision of digital and mobile telecommunications infrastructure is critical for the revitalisation of towns, villages and rural areas. Developments in information and communications technology (ICT) continues to fundamentally change how our society and economy functions.

The RSES supports a Smart Region to build on existing Smart City initiatives which embed digital technology across many functions to improve our quality of life. These concepts can also be applied to towns, villages and rural area. For example, Enniscorthy town has taken the initial steps towards the achievement of Smart Town Status with the establishment of the FAB LAB in 2017, the development of a Technology Park for smart business and the establishment of the National Zero Energy Building training centre.

To optimise the opportunities from smart technology, access to high-speed, high capacity digital and communications infrastructure is required. This is fundamental to ensure parity for all locations in our Region.

6.2 Transport and Mobility

The Issues Paper states that current transport trends are unsustainable and in order to meet future travel demand, change is needed. Urgent actions are required to improve modal change to sustainable mobility, especially when commuting trips nationally are expected to rise by 35% over current levels by 2040². The RSES addresses this challenge by placing a significant emphasis on a switch to sustainable mobility by requiring:

- Lower tiered plans and other transport strategies to enact land use and transport planning integration.
- The distribution of future population and employment growth must be aligned with transport infrastructure.
- Targets for modal change at a local level must be set.
- Actions, assisted through National Development Plan (NDP) investment, must target sustainable transport infrastructure as a priority.
- Increased priorities must be set for increased permeability in settlements for active travel, integrated multi modal travel chains, bus, rail, walking and cycling networks and inclusion of innovations in e-mobility.

The preparation of transport and mobility policies in the new Development Plan is a major challenge. There are some broad areas to consider a policy approach:

- (1) Improved regional accessibility by road and rail.
- (2) Improvements to local public transport services and sustainable transport modes for the three Key Towns and for the wider county with improved connectivity from towns, villages and rural areas as alternatives to use of the private car.
- (3) Policies to support the sustainable movement of freight through the County and onwards to ports and airports.

Successful integration of employment, housing and services with improved transport infrastructure is a priority issue. *RPO 151: Integration of Landuse and Transport* and *RPO 152: Local Planning Objectives*

² DTTS Sustainable Mobility Policy Review 2020

set out important principles to guide land use development in settlements to enable behavioural change and support active travel and viable public transport services with the right development in the right locations.

The RSES supports the role of Local Transport Plans (LTPs) to be prepared for Key Towns and other settlements (RPO 157) by local authorities based on Area Based Transport Assessment guidance from the NTA and TII. LTPs are important new land use and transport planning tools. Their preparation and implementation by transport agencies and local authorities is a new requirement in planning, sought by RSES objectives. Kilkenny City for example are currently preparing a LTP. These initiatives are an important step in improving sustainable mobility and they will assist actions at a local level to achieve sustainable 10 Minute Towns.

The Issues Paper references the RSES focus on a framework for the integrated development of sustainable transport infrastructure (page 19). There is a strong emphasis on linking placemaking policy to connectivity in the RSES. For example, the RSES supports 10 Minute Cities and Town neighbourhoods (*RPO 176: 10 Minute City and Town Concepts*) as a concept whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. Communities will need sufficient densities to realise the potential of a 10 Minute Town and its benefits for placemaking. The Draft Development Plan should include measures to support opportunities for sustainable 10 Minute Town neighbourhoods and to develop good practice in the concept.

The SRA are a partner in the EU Interreg Europe MATCH-UP project which aims to achieve significant improvements of modal interchange to foster low-carbon urban mobility. An outcome from the project is to set a framework of good practice to implement 10 Minute City and Town concepts successfully in the Region. This report along with supporting information is available on the [SRA website](#).

RSES support for intra-regional rural connectivity and improvements to transport networks along the Region's national tourism corridors in Chapter 6 are important for Development Plan policy for strengthened rural connectivity. Road based transport is often the only viable mode for rural and peripheral locations. The strategic road improvement schemes identified under the NDP are supported in the RSES (RPOs 167 and 168). The Draft Development Plan should ensure investment in road infrastructure is also framed in economic, social, environmental and sustainable transport terms (the opportunity to strengthen rural public transport and bus networks).

The delivery of cycle routes and greenway and blueway corridor projects are cited in the RSES for regional support but of equal importance from a regional perspective are smaller, cost effective measures to enhance walking and cycling permeability within and between our settlements. RPO 174 especially is a strong support for local authority policy and actions to improve walking and cycling facilities within and between settlements.

Investment and steady state maintenance in our existing road networks are still important. The RSES supports the role of our road networks as economic corridors for the movement of goods, as public transport corridors and as "life-lines" to rural and peripheral locations. Investment in road networks is supported in the context of an increased priority for low carbon transportation, public transport networks and increasingly for use by e-mobility modes (such as autonomous and electric vehicles).

6.3 Infrastructure

The RSES requires phased growth targets in tandem with infrastructure services under local authority Development Plans. It requires actions by key stakeholders to ensure water and wastewater infrastructure is coordinated and delivered in a timely manner to facilitate growth targets, with a specific focus on locations with the highest concentration of planned compact growth.

To achieve this, RSES objectives require a Core Strategy approach for phased infrastructure-led development in Development Plans and for Irish Water (IW) to align their Investment Plans with the settlement strategy and objectives of the RSES. To address capacity, RSES also requires Irish Water Investment Plans to address drinking water supply (under an IW National Water Resources Plan), the delivery of Strategic Water Supply projects and Strategic Drainage Area Plans. Such measures also address the EU Urban Wastewater Treatment Directive to eliminate pollution, protect and improve the quality of our water resources and environment.

To address regeneration of rural towns and villages, an important requirement of the RSES is co-ordination between local authorities, IW and other stakeholders to address Rural Wastewater Treatment Programmes and Servicing Rural Village initiatives.

Furthermore, local authorities are required to incorporate BGI and NBS which offer opportunities to create additional infrastructure capacity as well as delivering multiple co-benefits to our society and environment.

In setting out the Development Plan Core Strategy to 2028, adherence to NPO 72 (a) to 72 (c) will be required to differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the plan. When considering zoning lands that require investment in service infrastructure, planning authorities are required to include the reasonable cost estimates of delivering required services at both the draft and final plan stages.

The RSES identifies that a safe, secure and reliable supply of energy is critical to a well-functioning Region. With projected increases in population and economic growth, the demand for energy will increase. Energy utility agencies demonstrate that our Region is currently generating more energy than demand. Transition to new renewable energy technologies and positioning the Southern Region as a Carbon Neutral Energy Region is strongly supported. In this regard, the Draft Development Plan should align with this position and elaborate on its policy approach, particularly in relation to Climate Action.

7.0 Quality of Life

The Issues Paper recognises that central to the development of Tipperary's towns and villages is the provision of community services and facilities. Improving quality of life to build and safeguard inclusive communities and places is central to the ambition of the RSES and is detailed in *Chapter 7: Quality of Life*. This will require significant investment in people and in buildings and facilities as well as improvements in the performance and responsiveness of our institutions and processes.

The historical charter and heritage of Tipperary's towns will be important, not only in terms of driving heritage-based regeneration, but also in developing placemaking initiatives. *Section 7.1.1: Inclusive Communities and Places* emphasizes that the role of public intervention is to provide supportive policies that strengthens the fabric of communities, fosters pride of place and facilitates parity of opportunities, towards achieving sustainable and societally enriching goals. In this regard, local authorities are core agents in placemaking and will require policy support and context in the Draft Development Plan.

The challenge for the new Development Plan will be to address the community and social infrastructure needs and wider requirements for education and healthcare to cater for an expanding and changing population profile. Reference should be made to RPO 177 in *Section 7.1.2: Healthy Communities*, RPO 170 in *Section 7.1.3: Diverse and Inclusive Region*, RPO 182 in *Section 7.1.4: Age-Friendly Communities*, in particular.

Section 7.1.6: Learning Region states that learning plays a significant role in promoting social inclusion and a healthy, sustainable society. The RSES places a strong emphasis on education, skills development and lifelong learning in sections 7.1.6 to 7.1.9, with a key enabler being the establishment of an inclusive Learning Region for urban and rural centres across our Region. Building and expanding on the UNESCO Learning City concept to deliver a Learning Region can develop pillars of inclusive and sustainable development that will benefit all. Promoting this culture of learning will assist in the continued success of all education and learning provisions and enhance the skills and employment opportunities for our Region's population. In preparing policy responses in the Draft Development Plan, reference should be made to *RPOs 186: Lifelong Learning* and *RPO 190: Lifelong Learning and Healthy Cities*.

8.0 Environmental Assessment

Under the section 'Protecting Our Environment' the Issues Paper states that the impacts of changes as a result of new development must be considered at each step of the process. The environmental assessments of the Tipperary Development Plan 2022-2028 are a crucial element of the process that will assess the potential environmental impacts of the implementation of policies and objectives.

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 use these resources to inform the Council's own environmental assessments, including mitigation measures identified to address environmental sensitivities and constraints.

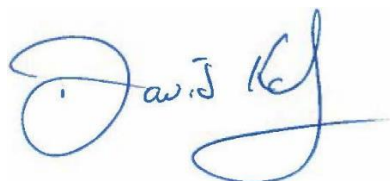
Conclusion

The SRA welcomes the pre-draft public consultation and commends the Planning Department for the clear signal of intent contained within the Issues Paper and Background Papers, particular in relation to Climate Action.

In providing our observations, the SRA have had due regard to Section 27A of the Planning and Development Act 2000 (as amended). As the pre-draft process advances and details emerge for the Core Strategy and the distribution of growth targets within this Development Plan cycle of 2022-2028, the SRA will have further recommendations at the appropriate stages.

Further engagement between the SRA as a key stakeholder and the Planning Department Tipperary County Council in the development of the Draft Development Plan is encouraged. The RSES team are available for future consultation and for any clarification required regarding this submission and during the pre-draft preparation stages.

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David Kelly
Director Southern Regional Assembly