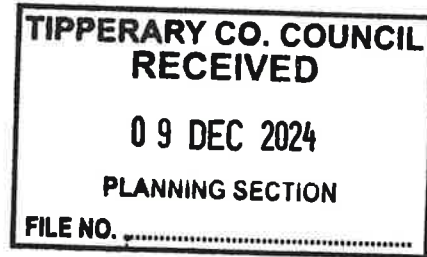




24.019.001.LAP.NC
6th December 2024
(Delivered by hand)

Carrick On Suir Local Area Plan
Planning Department
Tipperary County Council,
Civic Offices
Emmet Street
Clonmel,
Co. Tipperary.



Dear Sir /Madam

Re: Submission for the Carrick On Suir Local Area Plan 2025-2031

Please find enclosed a submission on the Carrick On Suir Local Area Plan prepared by Conroy Architects on behalf of JSF Construction Ltd., Carrick Business Park, Waterford Road, Carrick On Suir, Co. Tipperary E32 AE33.

We would be pleased to receive your acknowledgement of our submission in due course.

Yours faithfully



Neville Conroy
CONROY ARCHITECTS

Encs.

C.C. JSF Construction



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Spawell Road, Wexford, Y35 Y7PN
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Directors: Daniel Conroy,
Neville Conroy
BA, Arch.(Hons) Dip. Arch RIBA MR AI

**TIPPERARY CO. COUNCIL
RECEIVED
09 DEC 2024
PLANNING SECTION**

FILE NO.



SUBMISSION TO TIPPERARY COUNTY COUNCIL
24.019 - RESIDENTIAL ZONING SUBMISSION
CONSULTATION STAGE OF THE DRAFT
CARRICK ON SUIR LOCAL AREA PLAN 2025-2031
ON BEHALF OF JSF CONSTRUCTION LIMITED
DECEMBER 2024



Contents

01	Introduction
02	Purpose of this Submission
03	About the Petitioner
04	Site Location
05	Site Description
06	Draft Carrick On Suir Development Plan 2025-2031
07	A Case for the Proposed Residential Zoning <ul style="list-style-type: none">i. Distance from town coreii. Consolidation and sequential growth
08	Conclusion



01 INTRODUCTION

This submission is made on behalf of JSF Property Holding Ltd in respect of lands at Ballylynch situated to the Eastern side of Carrick on Suir, Co. Tipperary. (Figure 1). This is a submission in relation to the zoning for residential use of lands currently zoned amenity at the edge of the Town.

It is submitted that the requested residential zoning presents an opportunity for the timely delivery of a social and affordable residential development to meet an acute housing demand envisaged by the Regional Planning Guidelines and will assist in consolidating the quantum and location of new residential zoned lands to the Immediate East of Carrick on Suir Town, within an established neighbourhood and within reasonable waking distance to all amenities and transport services.

We request that the recommendations of this submission be given full consideration during preparation of the forthcoming Carrick On Suir Development Plan 2023-2029.

02 PURPOSE OF THIS SUBMISSION

The purpose of this Submission is to request a change to the Draft Carrick On Suir LAP in relation to the subject lands. However, our ultimate request on behalf of our Client is that the subject lands be zoned for residential development, in order to deliver much needed housing and to concurrently deliver (viably and feasibly) the long-standing amenity lands objective for this locality.

In support of the zoning request, a robust justification has been prepared, drawing on the accessibility of the site, the opportunity for contiguous infill development, the opportunity to deliver much needed housing and amenity infrastructure and, our Client's genuine intention to bring forward construction immediately.



Figure 1 : Carrick on Suir
(Image Credit: Google Maps 2024)

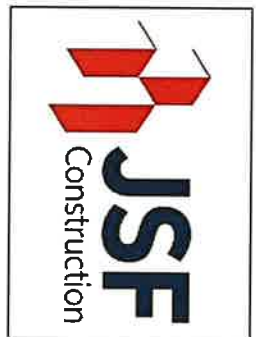


03 ABOUT THE PETITIONER

Our Client has a strong and established presence in Co Tipperary. They have completed the following quality developments:

- Bakers lot, Kichham Street, Carrick on Suir. An urban infill development of 14 Apartments for the elderly delivered on behalf of Tuath AHB and completed 2022.
- Mill Street, Carrick On Suir. A residential development of 22no two and three bedroom houses and completed 2020.
- Bregawn Phase 1, Wallers Lot, Cashel. A residential development of 80no dwellings which includes 8 Apartments and 32no two and three bedroom houses delivered for Tuath AHB and completed 2024.

JSF Construction are currently completing the next phases of a large scale residential development at Bregawn, Cashel and other residential developments in Clonmel. Further developments have been granted planning permission at Ballyclerihan Village and Gleann Na Locha, Carrick on Suir.



Mill Street Carrick On Suir



Bregawn Cashel



Bakers Lot Carrick on Suir

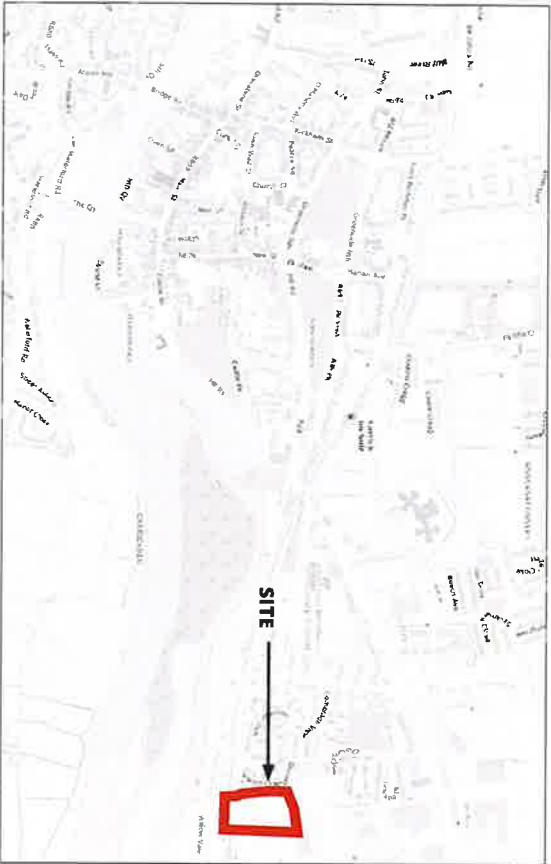


Figure 2: Site Location Map
(Image credit: OSI 2024)

04 SITE LOCATION

The land is located to the Eastern side of Carrick on Suir Town Co Tipperary and at the edge of an established residential settlement known as Ormonde Crescent.

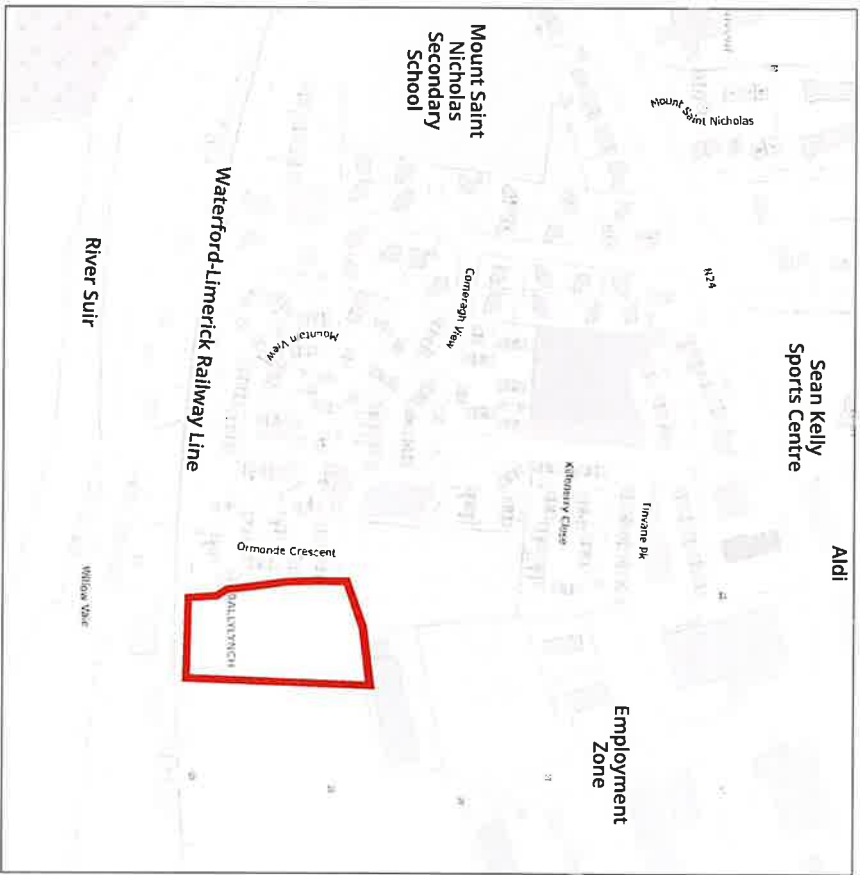


Figure 3: Site Map
(Image credit: OSI 2024)



05 SITE DESCRIPTION

The land measures approximately 0.86 Hectares. Access to the land is available from the N24 via Comeragh View and at the North West boundary adjoining Ormonde Crescent. (Figure 4). The lands are bounded to the south by the Waterford – Limerick Railway, to the East by Employment Zoned Lands and to the West by the Ormonde Crescent Residential Estate. The lands slope gently from North to South, the plot shape is regular with no significant topographical features.

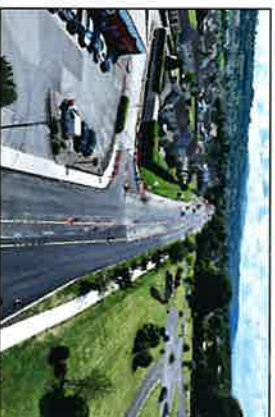


Figure 5: Junction Comeragh View and N24
(image credit: Glas Civil Engineering Ltd. / Tipperary Co. Co. 2023)



Figure 6: Junction Comeragh View and N24
(image credit: Google Maps 2024)

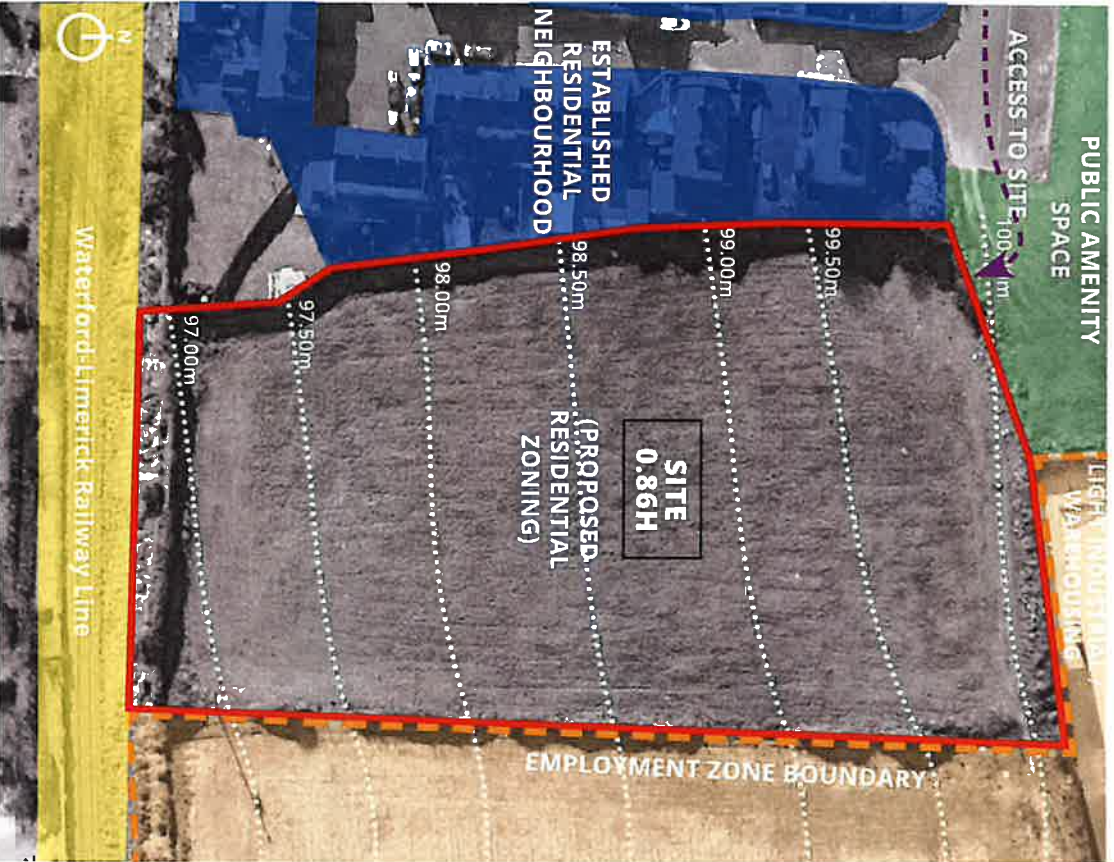


Figure 4: Site Description
(image credit: Apple Maps 2024)



06 DRAFT CARRICK ON SUIR DEVELOPMENT PLAN 2025-2031

The Draft Carrick on Suir LAP 2025-2031 contains a Residential Serviced Land Assessment and the subject lands are identified at No.16 therein, (Figure 7) Whilst the lands align with significant strategic objectives of the SLA criteria, it has been stated at Table A of the SLA Draft stage that **“Distance from Core and need for amenity space in this estate precludes development of this site”.** (Figure 8, Table A Residential SLA)

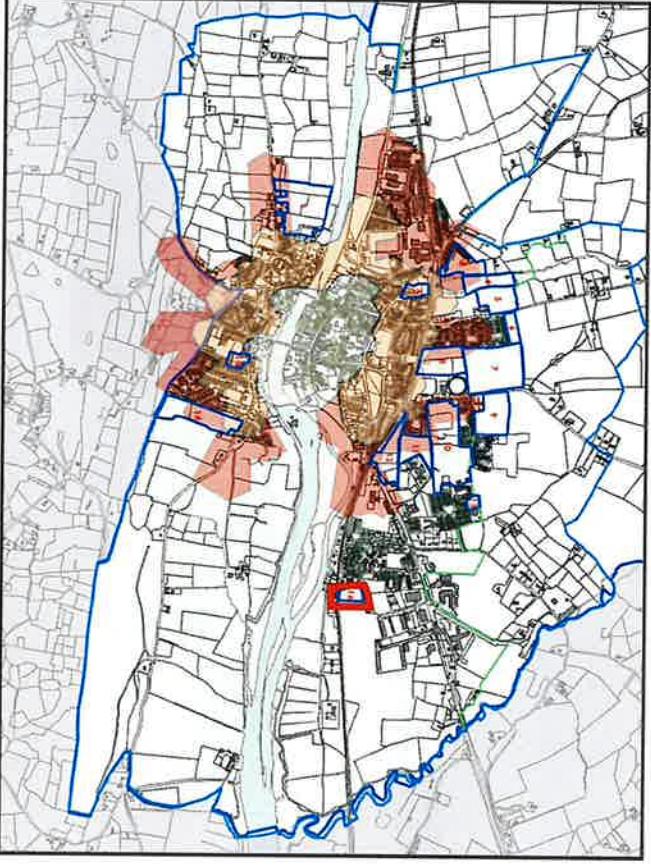


Figure 7: Map A: SLA for Lands available for new residential development
(Image credit: Draft Carrick-on-Suir Local Area Plan 2025-2031 Appendix 1, Tipperary Co. Co.)

No	Area	Notes	Availability of Infrastructure at the site						Sustainable Energy Criteria applicable to the site				Description	
			Water	Waste	Electricity	Gas	Public Transport	Food Source	Comm. Serv.	20% Energy Saving	20% Energy Saving	20% Energy Saving		20% Energy Saving
1	0.11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
2	0.10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
3	0.12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
4	0.13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
5	0.14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
6	0.15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
7	0.16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
8	0.17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
9	0.18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
10	0.19	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
11	0.20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
12	0.21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
13	0.22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
14	0.23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
15	0.24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
16	0.25	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
17	0.26	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
18	0.27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
19	0.28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
20	0.29	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
21	0.30	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
22	0.31	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
23	0.32	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
24	0.33	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
25	0.34	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area
26	0.35	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	T1 - 20% Reduction in energy use per unit of floor area

Figure 8: Table A: SLA for Lands available for new residential development
(Image credit: Draft Carrick-on-Suir Local Area Plan 2025-2031 Appendix 1, Tipperary Co. Co.)



07 A CASE FOR THE PROPOSED RESIDENTIAL ZONING

i. DISTANCE FROM TOWN CORE

We submit the case against residential zoning of the subject lands "distance from the core" put forward at draft stage of the plan does not preclude this site from residential zoning consideration. The lands can be shown to meet the sustainable development and planning criteria including:



INFRASTRUCTURE

Availability of infrastructure including Roads, footpaths, Water Supply, Public Lighting, Foul and Surface water infrastructure, these are already established and available on the lands).



CYCLE LANE

A cycle lane to the town centre is located at the junction with N24 and within 330m of the lands, this could be further improved within the existing residential estates road network to link the lands under an active travel scheme with no disruption to existing traffic patterns. The NTA publication Cycle Design Manual includes many such solutions for the retrospective implementation of cycle facilities in residential estates.

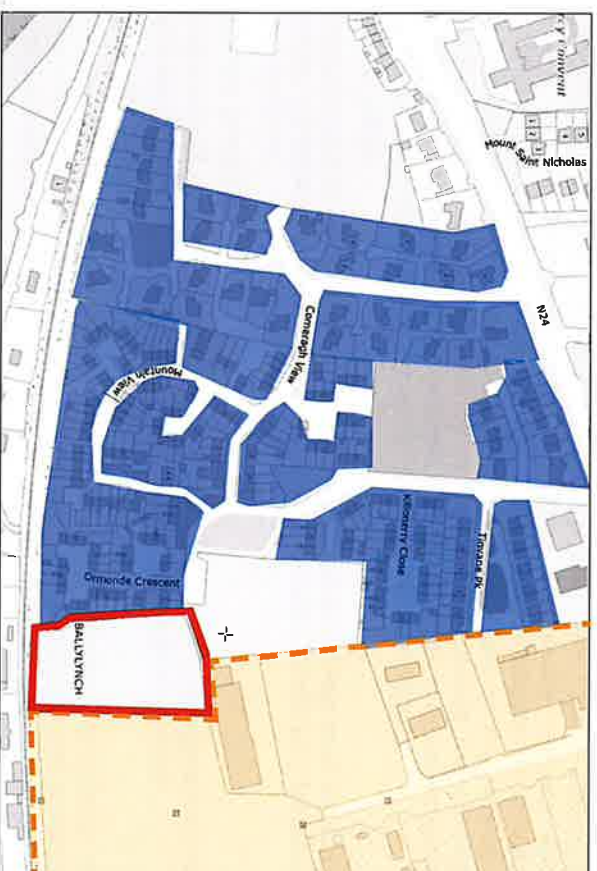
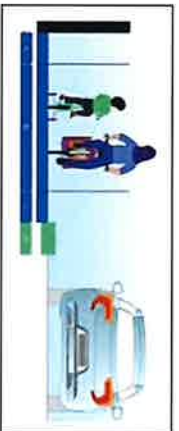


Figure 9: Compact Growth Diagram
(Image credit: OSI 2024)

COMPACT GROWTH

Development of the lands for residential purposes is logical in terms of completion of the adjoining estate and consolidation of the residential urban edge where it meets employment zoned lands. (Figures 9 & 10)

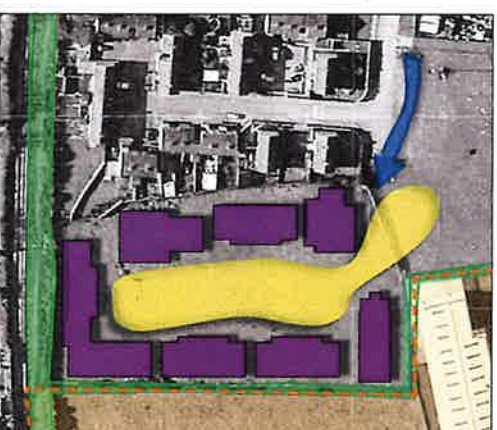


Figure 10: Compact Growth Diagram
(Image credit: OSI 2024)



CONSOLIDATION AND SEQUENTIAL GROWTH

Development of the subject land will have a positive effect on the adjoining estate. New building stock will encourage sustainable renewal and energy efficient refurbishment of the existing estate whether by private individuals or the housing authorities and contribute to the strategic development of the wider area by virtue of consolidating the existing urban plan. Furthermore, the positive effects of urban renewal projects such as this proposal can bring many improvements including:

LOCAL AREA

Improvement to the local area through revitalisation of degraded amenity areas, construction of new housing and associated landscape features and facilities

SOCIAL IMPACTS

Reduction of social inequality through the creation of new opportunities and economic investment in the most vulnerable neighbourhoods.

QUALITY OF LIFE

Improvements to the quality of life for residents through the creation of new and upgrading of existing public spaces, infrastructure and services and promotion of greater

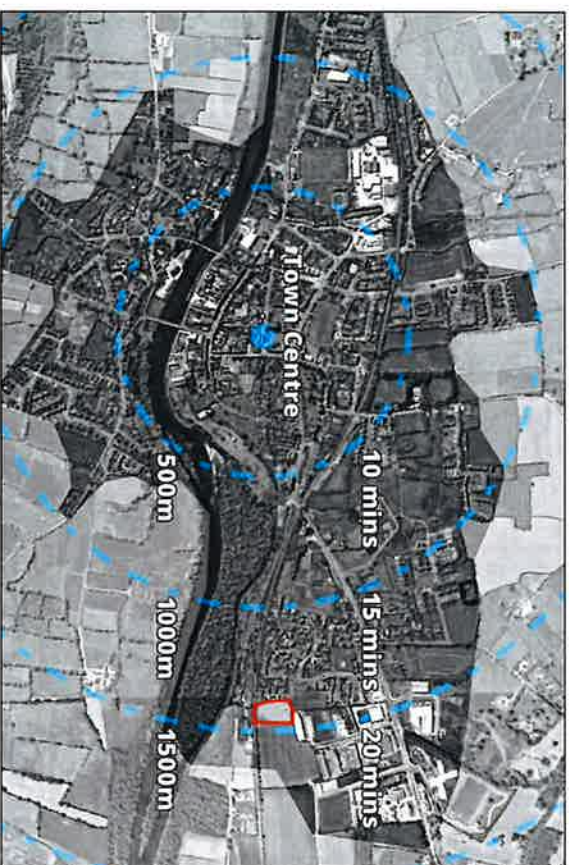


Figure 11: Walking Analysis
(image credit: Google Maps 2024)

WALKING ANALYSIS

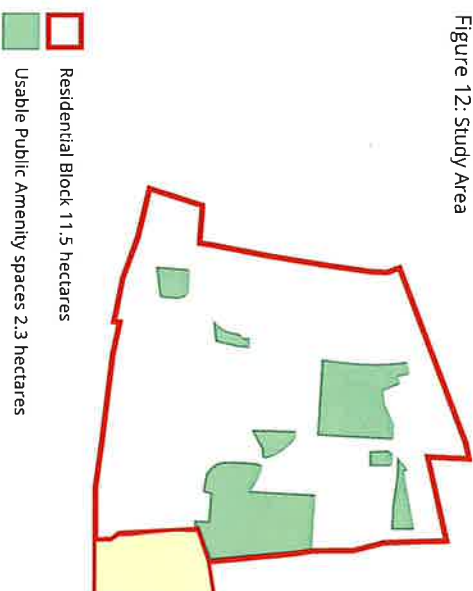
The subject lands fall within 1500m of the town core and comfortably within a 20 minute walking distance (Figure 11). The lands directly adjoin an established residential estate now in its 3rd generation of families most of whom walked and did not own a car when they first moved here. Established neighbourhood facilities such as shops, schools, leisure and amenity facilities all located within 5 minutes walking distance contribute to the sustainability and viability of the existing estate and to a greater extent mitigate the argument against residential zoning on the basis of distance from the town centre.





ii. NEED FOR ADDITIONAL AMENITY SPACE

Figure 12: Study Area



We have assessed the current public amenity space and availability of recreational amenities in the immediate area of the subject lands. Fig:12 shows the residential block covering an approximate area of 11.5 Hectares. Highlighted within the block are public amenity spaces of approximately 2.3 Hectares. 20% of the total area is available amenity space. Current Development Plan standards for residential estate development stipulate a 15% minimum public amenity space standard with further provision for large scale high density schemes. Our assessment does not indicate the need for additional amenity space. A renewed focus on quality rather than quantity is required. An evaluation of the quality of the space and amenities provided highlights deficiencies in many key areas fundamental to the sustainability of amenity space. Criteria relating to good quality spaces include:

- Accessible and linked amenity spaces.
- Evidence of proper maintenance
- Attractiveness of the spaces and their appeal
- Comfort
- Inclusiveness
- Activities and uses
- Purposefulness
- Safety, security

Current amenity space is not universally accessible, it is underutilised, has poor permeability and is not integrated with the residential neighbourhood which it serves. By virtue of its layout, topography, poor presentation, positioning, lack of feature and landscape treatment (aside from the recently installed ballcourt and junior play equipment) it does not offer variety for different user groups or age profiles and is largely unchanged since first occupation of the estate.

It requires a strategic landscape objective to develop it sequentially for residents to include play areas for children of differing ages, allotments for those without gardens, quiet areas for seniors, adolescent areas, kick about areas, self-sustaining nature and bio diversity areas. These require significant engagement with the community, they do not necessarily have to be expensive capital projects.



Figure 14: Site Location Map
(image credit: OSI 2024)



Figure 15: Site Location Map
(image credit: OSI 2024)



Figure 13: Site Location Map
(image credit: OSI 2024)



08 CONCLUSION

An amenity land zoning for the subject lands would compound some of the more serious deficiencies currently observed. On the other hand a residential zoning would deliver a catalyst for wider and sustainable improvements in this neighbourhood. An injection of new building stock will invigorate the neighbourhood with positive social and quality of life impacts.

