

**From:** [Tipperary County Council - Consultation Portal](#)  
**To:** [Planning Policy](#)  
**Subject:** Webform submission from: Draft Carrick-on-Suir Local Area Plan 2025-2031 Proposed Material Alterations  
**Date:** 24 March 2025 10:26:57

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Submission ID: DCOSLAP--6

Submitted on Mon, 24/03/2025 - 10:26

Submitted by: Anonymous

Submitted values are:

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Tomas O'Donoghue

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**Address**

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**Details of organisation, group or company represented (where relevant)**

Mr. L. & Mr. J. O'Sullivan, Carrickbeg. Owners of lands associated with Site Ref. 14 with respect to New Residential Zoning

**Address of land to which the submission refers, if relevant (please also attach a map):**

Site Reference 14, Carraigbeg.

**Comments**

## Comment

Subject: Opposition to Amendment 67 of the Proposed Material Alterations to the Draft Carrick-on-Suir Local Area Plan 2025-2031- Amendment of the Land Use Zoning Map as it relates to Site 14.

## Summary.

We request that the Council does not proceed with Amendment 67 of the Proposed Material Alteration to the Draft Carrick-on-Suir Local Area Plan 2025-2031. Instead we request that the Planning Department of Tipperary County Council, in conjunction with Gas Network Ireland (GNI), control and regulate any proposed construction works within and adjacent to the wayleave. Supporting arguments below.

1. Unbalanced weight given to information contained in submission by Gas Network Ireland results in significant loss of available residential land. Reduction from 4.4ha to 3.75ha (approx.).

Amendment 67 proposes to reduce the lands zoned New Residential on site ref. 14 from 4.4ha to 3.75ha approx., presumably solely based on information provided in a submission by Gas Network Ireland (GNI). The information submitted by GNI was advisory in nature of a known existing wayleave registered on title, which indicated that there was a high pressure pipe running through a section of the site requiring restrictions on works on the wayleave 3m either side of the pipeline. GNI advised Council of publicly available information of strict restrictions on what and how any works may be carried out within the wayleave. The submission included a copy of Code of Practice operated by GNI which laid out how any proposed works had to be submitted to them prior to commencement, had to be vetted by them and if acceptable, supervised by GNI operatives. At no point did GNI submit that the proposed change of zoning from Agricultural to New Residential not proceed, or submit any additional restrictions were required for the remaining lands not immediately under the wayleave.

The Council's proposed alteration of the rezoning of a portion of Site ref. 14 to New Residential appears to be based on an erroneous assessment of the requirements/development constraints associated with the wayleave, only, as provided in the submission by GNI, copy in above map.

2. Proposed amendment results in significant loss of available residential land. Reduction from 4.4ha to 3.75ha(approx.).

Amendment 67 proposes to reduce the lands zoned New Residential on Site ref. 14 from 4.4ha to 3.75ha approx. By rezoning the smaller 0.65ha(approx.) parcel of land as Towns Environs, the overall number of units that can be built on Site Ref. 14 is significantly reduced and in addition, the possibility to use that remaining 0.65ha section of the lands as part of the overall open space requirement is removed and the housing density for the remaining 3.75ha is further reduced.

This would result in, at the very minimum, a higher number of houses being built in the remaining 3.75ha. Considering Site Ref. 14 was the only site which achieves a full set of positives for the New Residential zoning assessment matrix, it would appear to be a missed opportunity to reduce the available lands, especially when any possible concerns that GNI have can be fully dealt with by the two supervising bodies, the Planning Department and GNI itself.

3. Scalability of shared costs of infrastructure construction over full 4.4ha.

The cost associated with the need to upgrade any wastewater and potable water pipelines, as outlined by the Uisce Eireann submission, would be more reasonably met when shared

by the greatest number of households possible. This would keep the affordability of housing to a minimum, resulting in a direct benefit to future householders and in an increased social housing opportunity. The higher the construction costs, the higher housing purchase costs to future homeowners.

4. Impracticable consequence to access of “Towns Environs” if Amendment 67 proceeds? If Amendment 67 proceeds, the area of land excluded from the proposed New Residential rezoning will be isolated and marooned, with no access road. As there is no access road into Folio TY67959F Plan DWM52 from the R676 Road, these agricultural lands could not be serviced other than through the residential development and this would result in an unnecessary financial burden and disadvantage to the landowner.

5. Location of wayleave further east than proposed amendment location.

Furthermore, based on comparison of the folio map showing the location of the wayleave and the proposed boundary line for the proposed Towns Environs rezoning, it would appear that the area of land under consideration(0.65ha) is significantly greater than required.

6. Folio of land was zoned residential with no carve out under previous Local Area Plan.

The whole of subject area was previously zoned residential, with no carve out for the wayleave, but for reasons unexplained or notified to the land owner the residential zoning was removed.