

MANAHAN PLANNERS

Town Planning Consultants

38 Dawson Street, Dublin 2. Email: info@manahanplanners.com. Web: www.manahanplanners.com.
Tel: 01-6799094. Vat No: 2850391E. Tony Manahan B.A.(Hons), M.Phil (Edin), M.I.P.I.

Tipperary County Council
Planning Department
Civic Offices
Clonmel, Co. Tipperary.

11/09/23

[Submission by online portal www.consultations.tipperarycoco.ie/form/draft-thurles-lap-2024-2030]

Re: Public Consultation Submission in relation to the Draft Thurles Town Local Area Plan 2024(LAP)

Dear Sir/Madam,

We have been instructed by our client, [REDACTED], [REDACTED], [REDACTED] to make a submission to Tipperary County Council in relation to the Draft Thurles Town Local Area Plan 2024 (LAP). This submission seeks to retain the 'Existing Residential' zoning objective, or be designated as 'New Residential' zoning on lands located at Bohernamona Road, Thurles, Co. Tipperary, in the forthcoming Local Area Plan.

The subject site is a greenfield rectilinear landholding of approximately 5.9 Hectares, situated c. 1.3km north east of Thurles Town. It is bounded to the west by the Bohernamona Road, to the south and north by existing residential, to the southwest by a public park (which has been recently granted permission for an Ecopark, and the Playing fields of Peake Villa AFC and Thurles Rugby Club to the east.



Figure 1: Site Location Context Map showing the extent of lands in ownership in red and distance from the river Suir bridge



Figure 2: Site location context map. Indicative site boundary in red

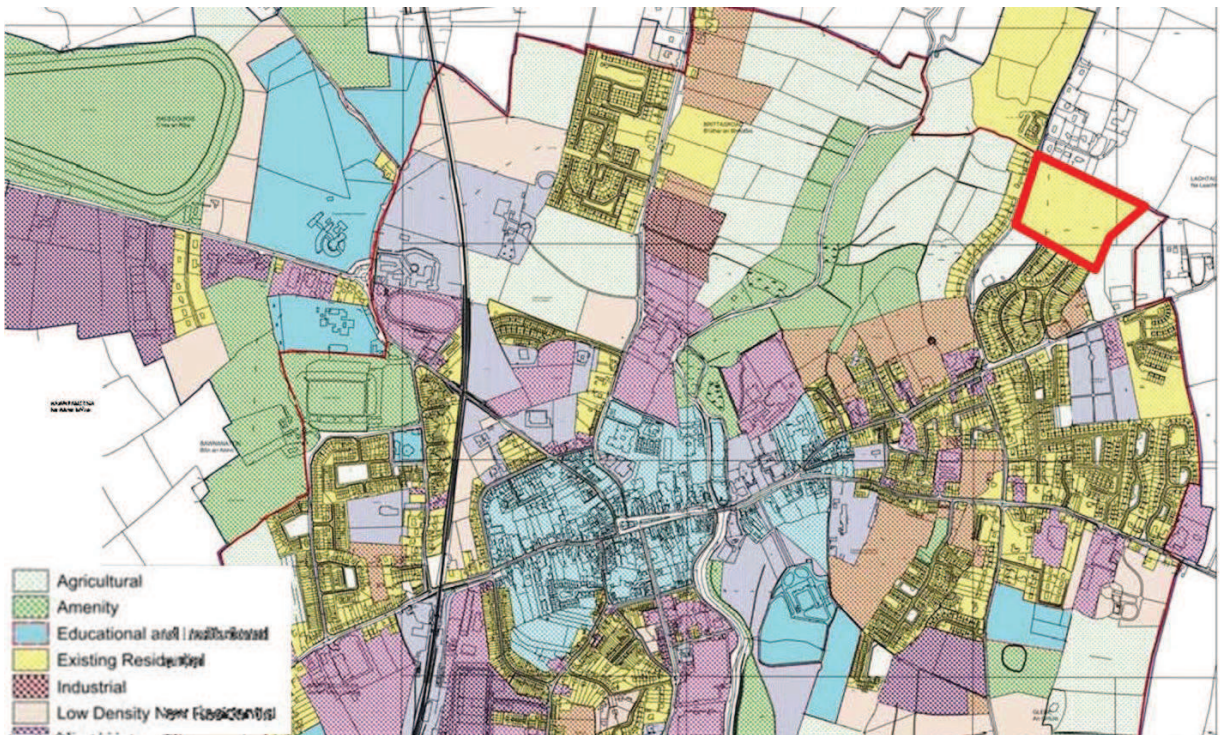


Figure 3: Thurles Town LAP Zoning Map 2009-2015, site outlined in red and zoned Existing Residential

Planning History

There have been 2 no. planning applications for residential development on site. See below.

Reg. Ref. [REDACTED] Granted permission by Tipperary County Council on 11th May 2006. The permitted development consisted of:

“Residential development comprising of 144 No. houses, 8 No. apartments and a creche (279sqm). Also associated car parking, open spaces, site development and ancillary works on site access from the Bohernamona Rd.”

Reg. Ref. [REDACTED]: Granted Permission by Tipperary County Council on 5th August 2008. This application was for amendments to the parent permission above (Reg. Ref. 05511452). The amendments to the permitted development consisted of:

“To omit 8 apartments and 23 houses and incorporate 48 apartments and 6 houses, including associated car parking, open spaces, site development and ancillary works.”

A total of 175 no. residential units (127 no. houses and 48 no. apartments) and 279 sq.m crèche have been permitted on the subject lands. It is noted and accepted that these permissions are now extinct.

The layout of the previously permitted residential development is shown below.

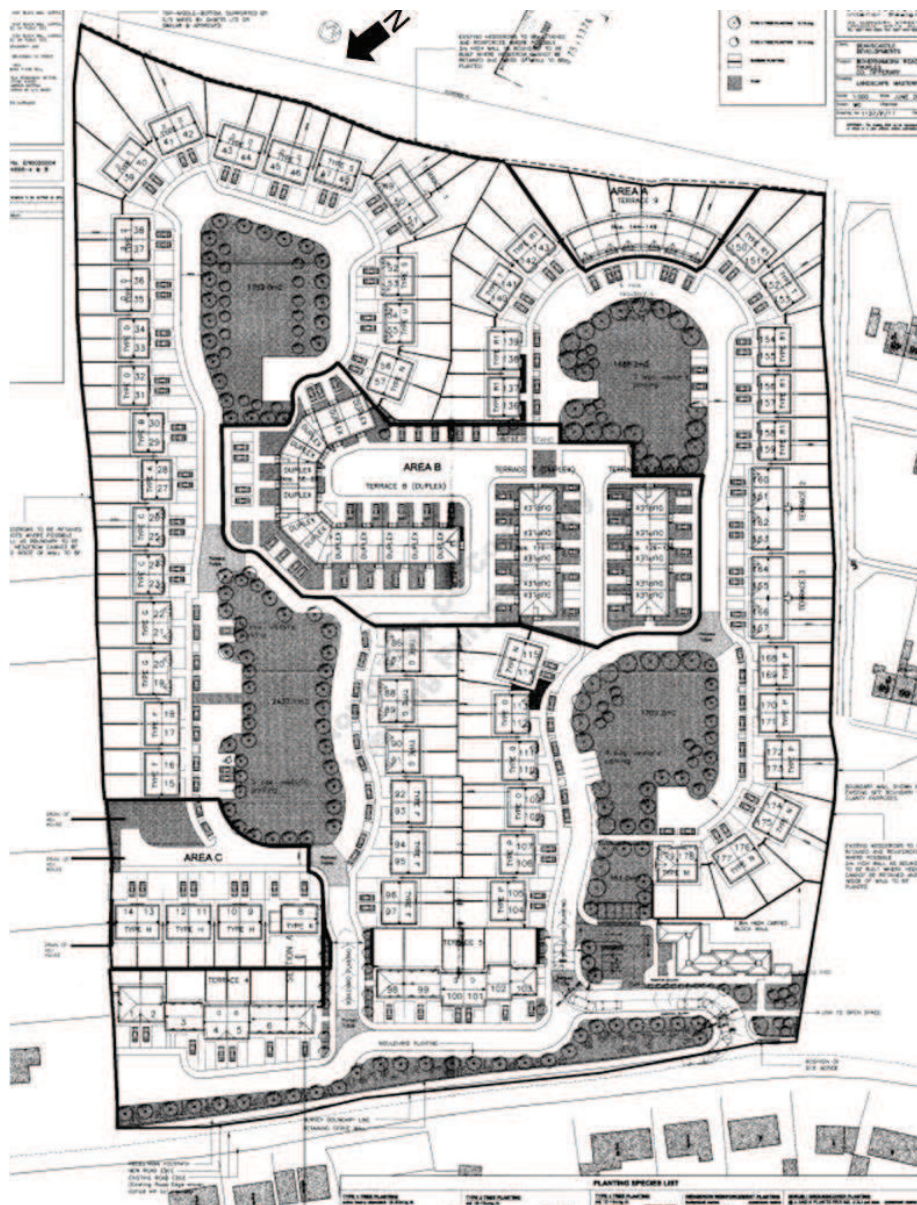


Figure 4: Permitted Site Layout Plan Reg. Ref. [REDACTED]. Extracted from Tipperary CoCo Planning Viewer

Relevant Adjacent Planning Permissions

Reg. Ref. [REDACTED] & Reg. Ref. [REDACTED]: To the south west of the subject lands, Tipperary County Council granted permission for residential development (phase 1& 2) and a greenway/cycleway through the site over a number of phases (total 125 units). There is 1 no. vehicle access and a proposed new crossing point across Bohernamona Road to Loghtagalla Park. The location of the crossing point was arrived at in discussion with the Councils Roads Section.

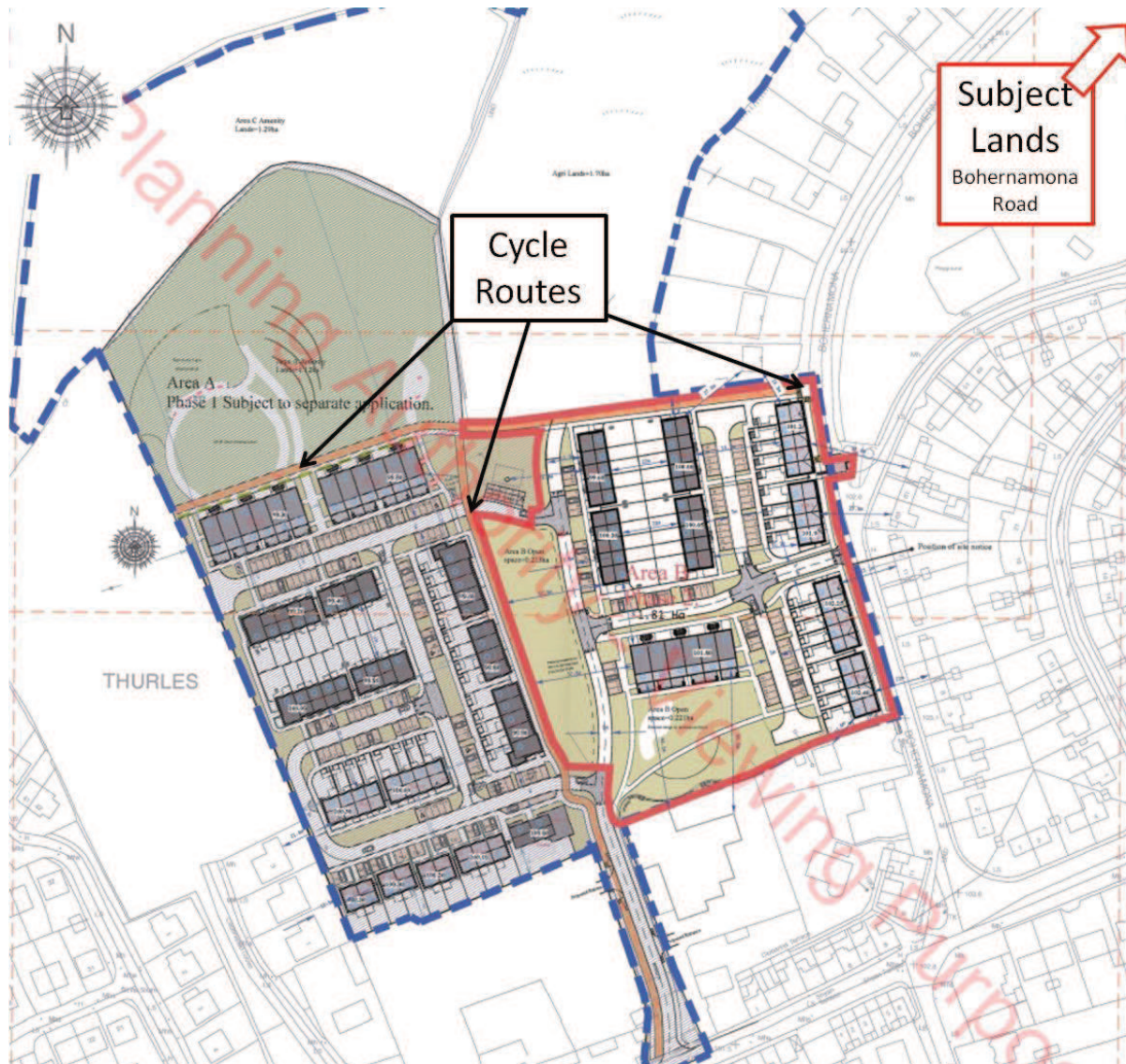


Figure 5: Permitted Site Layout Plan Reg. Ref. [REDACTED]. Extracted from Tipperary CoCo Planning Viewer

Draft Thurles LAP 2024

The Draft LAP outlines the local spatial planning framework for Thurles with planning policies and objectives unique to the town.

It is projected that by 2030 (the LAP lifespan), it will be necessary to cater for a population of approximately 10,057 persons an additional 2,117 persons over 2016 population. This projected population growth would result in an estimated requirement for approximately **784** additional housing units (2.7 persons average occupancy) to 2030.

At the time of preparing the Draft LAP, planning permission is in place for new housing as follows:

- 36 dwellings – Stradavoher
- 125 dwellings – Bohernamona
- 63 dwellings – Lognafulla
- 26 dwellings – Dublin Road

This equates to planning permission in place for **250** units primarily located to the east of the River Suir. However, it is all too common that granted planning permissions do not commence for many reasons, therefore the permitted 250 units is not a guaranteed output.

The Draft Thurles LAP Zoning Map now proposes to designate the subject lands (c.5.9ha) as ‘Strategic Reserve’. We respectfully request Tipperary County Council to not proceed with this ‘de-zoning’ of the site, but to retain the ‘Existing Residential’ zoning or apply a ‘New Residential’ zoning designation to the subject lands at Bohernamona Road in the forthcoming LAP.

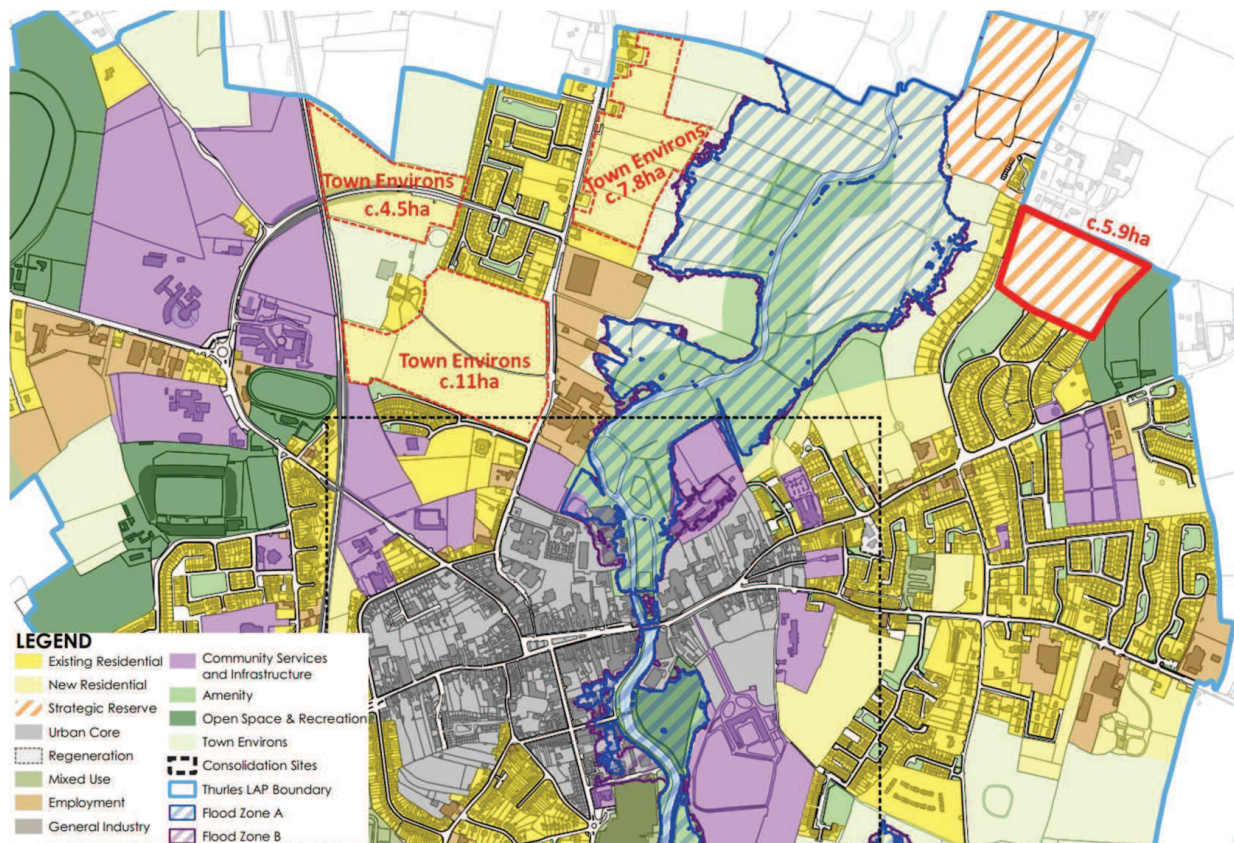


Figure 6: Draft Thurles LAP 2024 Zoning Map, annotated to identify lands requested for zoning change

The reason for this request is a result of an imminent planning application for the construction of a residential scheme at the subject site. It is anticipated that the application for development will be lodged and decided upon before the Local Area Plan will be adopted in 2024.

The LAP Zoning Map contains ‘New Residential’ zoning on lands that in our opinion, are not realistic development sites for new housing. For example, c.11 hectares of previously zoned agricultural land at Ardfort House, Brittas Rd. (N62), north of Thurles Town. These are prime agricultural lands which form the estate of Ardfort House. It is considered that, should these lands ever come available to market, the valuation of the land will make it impossible to deliver accessible and affordable homes.

There are further sites (c.7.8ha) north along Brittas Road (N62) Jimmy Doyle Road(c.4.5ha) that are zoned 'New Residential' that we consider to less appropriate than the subject lands at Bohernamona Road.

We submit that the identified 3 no. sites (total c.23.3ha) zoned for 'New Residential' should be considered as 'Town Environs' zoning or as 'Strategic Reserve', and that the subject lands at Bohernamona Road be zoned as 'Existing Residential' or 'New Residential'.

Further to the above, there may be Public Submissions from other landowners requesting their lands be removed from a residential zoning objective on their lands due to having no desire to develop lands and avoid Residential Zoned Land Tax (RZLT). The subject lands at Bohernamona Road are servicable, accessible and ideal for new housing.

The Draft Thurles LAP includes a table that scores the availability of services at the site and the sustainable planning criteria analysis. The subject lands at Bohernamona Road is noted as Ref. 9.

Site reference		Availability of Infrastructure at the site						Sustainable Planning Criteria applicable to the site				Category Score
Ref	Area Ha	Roads	Footpath	Water	Cycle Lane	Public Lighting	Foul Sewer	Compact Growth	Walking analysis 5 - 10 mins	Walking Analysis 10 - 15 mins	Sequential	T1/T1/T3 Excess
9	5.91	✓	✓	✓	✗	✓	✗	✗	✗	✗	✗	SR

It is incorrect to say there is no Foul Sewer servicing available to the subject lands at Bohernamona Road. This foul water sewer has been indicated to us by Irish Water as part of pre-planning consultations. It is located at the SW corner of the site.

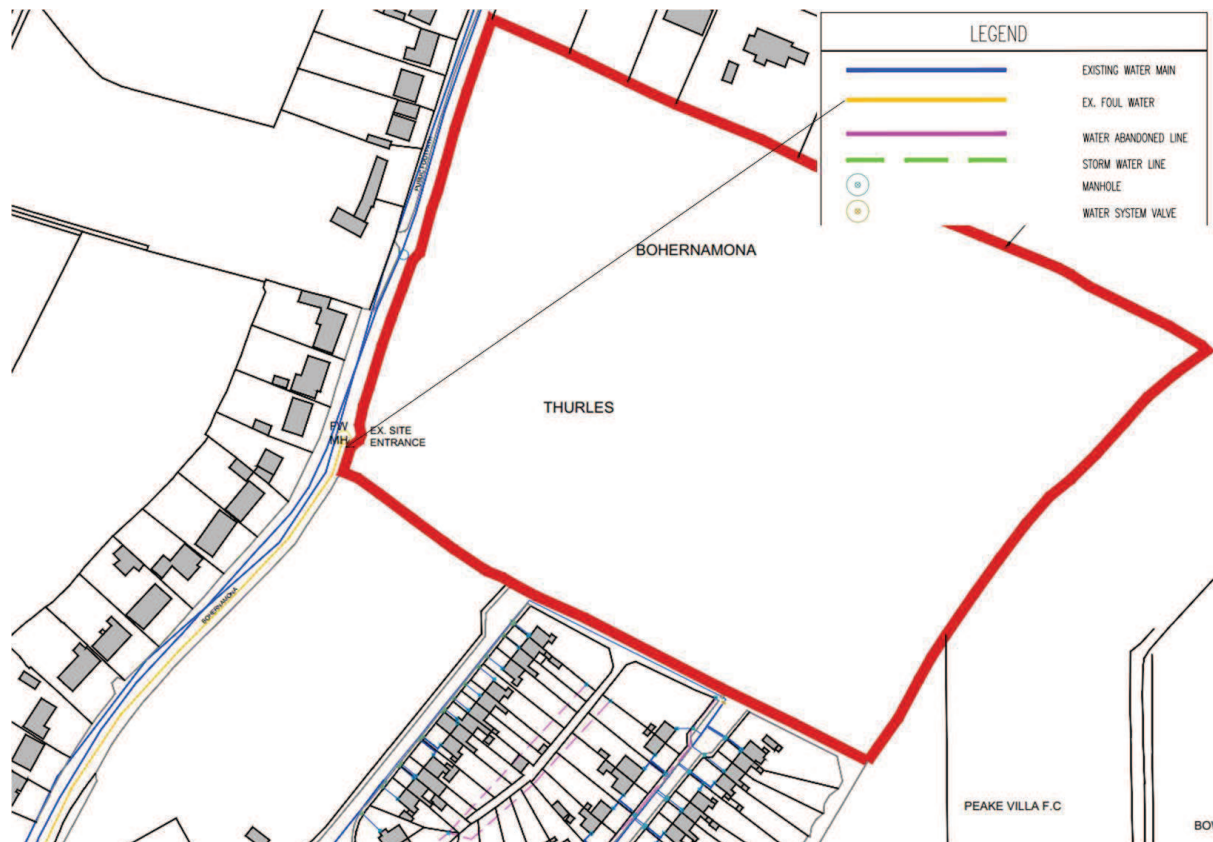


Figure 7: Location of Existing Foul Water Services located at the main entrance to the site at the south west corner

In addition, the subject lands are not isolated from residential and social amenities or active travel routes. The site is located adjacent established residential areas, public parks, and the Town’s soccer and rugby clubs sports facilities. The site is situated alongside a dedicated pedestrian route through the adjoining park, and has easy access to the anticipated greenway running east/west along the north of the town, see below Figure 8. The greenway would serve as a vital east-west active travel link across the town, connecting a number of proposed radial segregated cycle links to several schools, large residential communities and the town centre.

The greenway would also provide a segregated active travel link to the train station from the eastern side of the town i.e. for Mitchel Street, Bohernamona Road and Loughtagalla residents which otherwise would have to cycle with general traffic. The first phases of the greenway have been permitted by Tipperary County Council under Reg. Ref. [REDACTED] and Reg. Ref. [REDACTED]

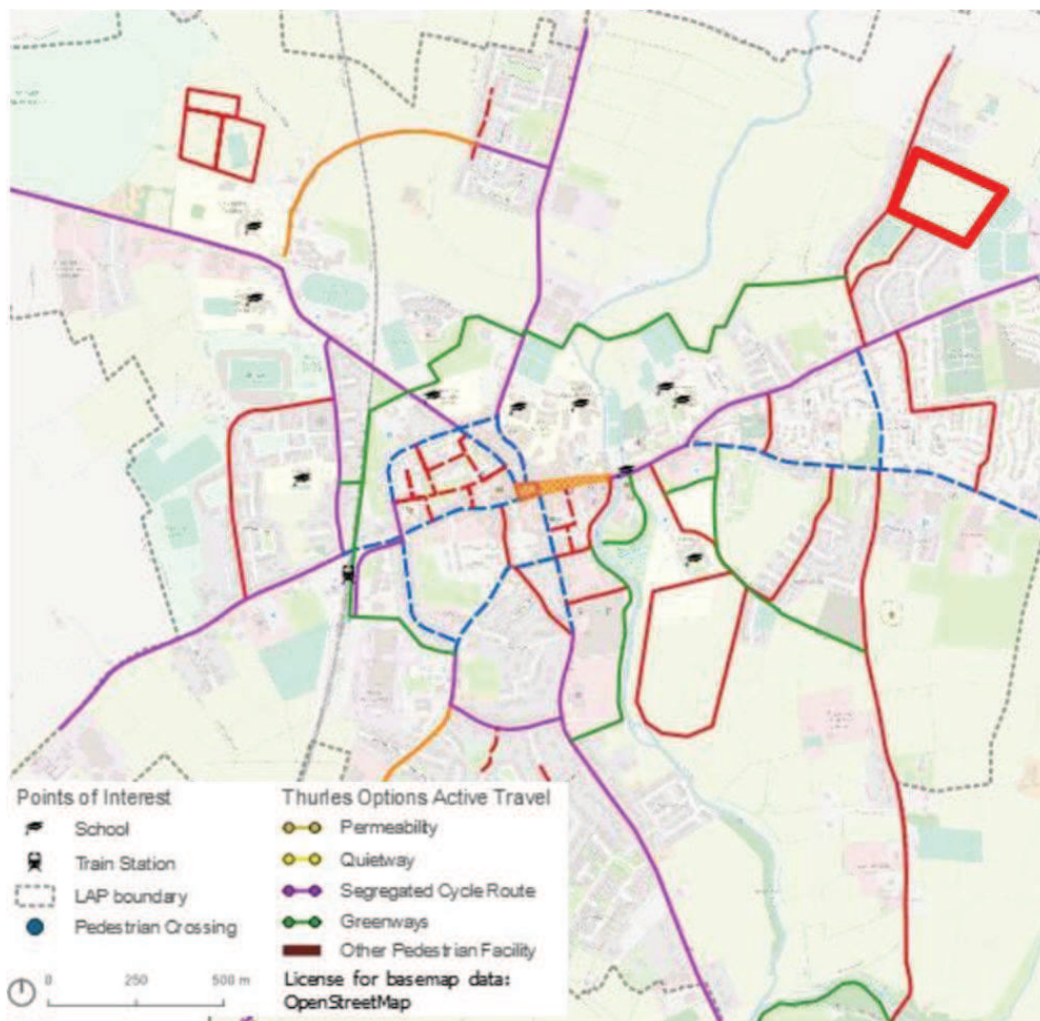


Figure 8: Draft Thurles LAP 2024 Active Travel Routes

Although there is no dedicated cycle lane along Bohernamona Road to the subject site, high quality pedestrian routes exist through Loughtagalla ‘Eco’ Park. We would anticipate that cycling facilities will be incorporated within the park in the future by the Council’s Active Travel Team. Future residential development on the subject lands could include a cycleway along the western boundary of the site on Bohernamona Rd. which connect to the routes within the adjoining park to the south.

The subject lands also immediately adjoin the Peake Villa Soccer Club and Thurles Rugby Club to the East. Pedestrian connection to the soccer lands will be provided. This will allow future residents, particularly parents and their children, walk to these facilities. At present people drive from all over

Thurles to these amenities, a contention attested to by the extensive car parking facilities located to the front of these sports fields. Locating a future cohort of users of these amenities within walking distance, should in our view be a positive criteria for retaining the existing residential zoning on the site. It is submitted that the “infrastructure” heading in the above table should have included accessibility to social amenity infrastructure. This social infrastructure would include the Eco park immediately adjoining the site on its south boundary.



Figure 9: Loughtagalla ‘Eco’ Park entrance

In terms of accessibility to the centre of the town, until the proposed greenway is completed, the subject lands at Bohernamona Road will be c.16 minute walk or c.5 minute cycle. This is not an unreasonable distance having regard to the presence of amenities closer to the site.

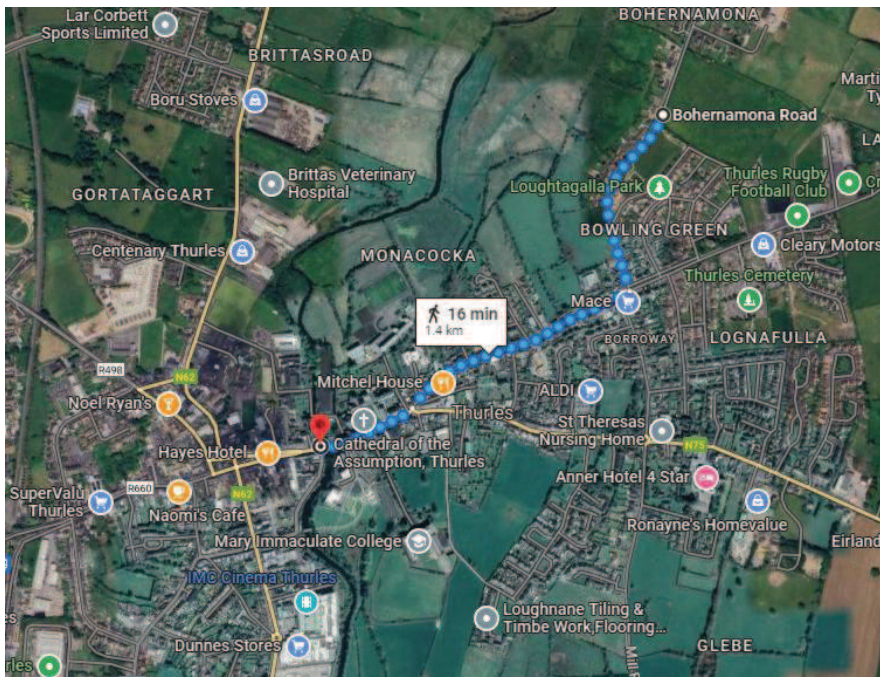


Figure 10: Estimated walking time of 16 minutes from site entrance to River Suir bridge

Forthcoming Planning Application for Residential Development

We, on behalf of [REDACTED], and the design team have undertaken Pre-Planning Consultations with Tipperary County Council ([REDACTED] the area planner and [REDACTED], the district engineer) on the 10th May 2023 in relation to a forthcoming planning application for new residential development of c. 172 units over 2 phases at the subject site. A draft masterplan sketch of an overall proposed layout presented to Tipperary County Council is shown below (Figure 11).

As it is proposed to develop the site in two phases. The section adjoining the access road will contain the initial section of the development containing dwellings, open space and a creche to service the future residents. A second stage will be applied for subsequently, having regard to feedback from the planning authority in relation to phase One. Access would be provided to the soccer and rugby playing fields to the east and to the park to the South in the interests of ensuring permeability of the proposal to the adjoining facilities.

In addition, the possibility of a cycleway on the west side of the site is currently being investigated by the design team following the recent publication of the Draft LAP. It could link to existing pathways and potential new routes through the adjoining Loughtagalla Park and from there to the existing and proposed cycleway facilities within the town.

It is anticipated that the relevant drawings, studies, assessments and documents will be finalised and ready to be lodged with Tipperary County Council during October 2023. Should this be the case, it is highly likely that a decision will be made based on the existing residential zoning before the Thurles LAP 2024 is adopted.

On this basis, it is requested that Tipperary County Council retain the zoning objective of the previous Thurles LAP 2009-2015 as 'Existing Residential' or designate the lands as 'New Residential' in the forthcoming LAP 2024.



Figure 11: Sketch Draft Proposed Site Layout

Conclusion

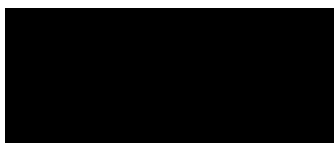
Having regard to:

- The relatively recent planning history to construct housing at the subject site,
- That the site remains within the Development Boundary of the town,
- The proposal involves the provision of a dedicated cycle lane along Bohernamona Road in the subject site linking high quality pedestrian routes through Loughtagalla 'Eco' Park with the potential to connect to future cycling routes, including the east/west greenway,
- The proposal involves the provision of a dedicated cycle lane along Bohernamona Road in the subject site linking to high quality pedestrian routes through Loughtagalla 'Eco' Park and the potential to connect to future cycling routes, including the east/west greenway,
- Tipperary County Council permitted an east/west greenway along the north of the town under Reg. Ref. [REDACTED] and Reg. Ref. [REDACTED], connecting to the eco park lands at Bohernamona Road,
- At present, the subject lands are c.16 minute walk or c.5 minute cycle to the River Suir bridge. Delivery of described future infrastructure will further increase connectivity to the town,
- The subject lands at Bohernamona Road are not isolated from residential and social amenities or active travel routes. The site is immediately adjacent the Loughtagalla Park/playing field and playground, Peake Villa Soccer Club and Thurles Rugby Club. Future residents and their children will be able to walk to these facilities. At present users drive from other areas of town, hence the extensive parking facilities. Adjoining these clubs.
- The site adjoins a Foul Water Sewer, contrary to the LAP Assessment Criteria of available infrastructure which states there is none,
- There is a forthcoming planning application for residential development to be lodged with Tipperary County Council, a Pre planning meeting for which was held in May 2023. It is anticipated this application will be assessed and decided upon, under the current zoning, before the adoption of the Thurles Town LAP in 2024.
- The identified 3 no. sites (Ardfort House, along Brittas Road (N62) and Jimmy Doyle Road, total c.23.3ha) zoned for 'New Residential' in the Draft LAP may more appropriately be considered as 'Strategic Reserve'.

In conclusion, it is requested that Tipperary County Council retains the subject site's zoning objective for Residential use and not to apply a 'Strategic Reserve' designation to the lands. Such designation is considered to be inappropriate, having regard to the circumstances set out in this report.

We trust the above is to your satisfaction and request the above to be included for consideration in the future assessment of the Draft Local Area Plan 2024 public consultation.

Yours faithfully,



Tony Manahan

Manahan Planners