

Mairead Redmond & Peter Malone  
83 Springfort Meadows  
Limerick Road, Nenagh  
Co. Tipperary  
27<sup>th</sup> February 2023



To: Planning Section  
Tipperary County Council  
Civic Offices  
Limerick Road  
Nenagh

Re: Planning reference **2360047** – Development at Springfort Meadows, Limerick Road, Nenagh

Dear Sir/Madam

We, Mairead Redmond and Peter Malone are objecting to the above proposed development under planning reference **2360047**. We are deeply concerned about the proposed development and in our opinion it is not in compliance with the proper planning and sustainable development of the area.

#### Open Space:

We referred to the Nenagh Town Development Plan (2013) on the Council website. This includes a requirement in Chapter 9 that a minimum of **15% of the gross site area** of the development is kept as useable open space.

The estate as it is currently meets this requirement. The map below shows the existing open space and the table shows how the open space requirement is met.



Estate Green Areas	Comment	Area (m <sup>2</sup> )
Total Estate Area (m <sup>2</sup> )	(Purple outline)	62,137
15% Open Space Requirement (m <sup>2</sup> )		9,320
Area 1		4,010
Area 2		2,415
Area 3		515
Area 4 & 5		607
Area 6	(Site reserved for crèche)	788
Area 7	(Site of planning permission)	3,764
Total of Areas 1 to 7 (m <sup>2</sup> )	(19.5% open space)	12,099
Total of Areas 1 to 6 (m <sup>2</sup> )	(13.4% open space)	8,335
Total of Areas 1 to 5 (m <sup>2</sup> )	(12.2% open space)	7,547

The planning submission intends to develop **18 new houses** on the site of **Area 7**. If this is permitted to happen, the open space in the estate will drop to 13.4%. Also, **Area 6** was originally meant to be a site for a crèche and was never intended to be open space. If the proposed houses are constructed and the intended crèche is constructed at some point in the future, the open space will fall to 12.2%, well below the 15% open space requirement required by the Council.

Based on the professional advice we have received, the small size of **Area 4** and **Area 5** at the entrance road to the estate makes it difficult to consider them as “useable open space” that the Nenagh Development Plan looks for.

It is our opinion that the only way to ensure that the estate remains compliant with the Council’s own Development Plan for Nenagh is to reject this planning application. The site in **Area 7** has been used by the residents as open space since the estate was constructed over seventeen years ago, especially by the families in the back road of the estate who are not comfortable in letting our children play on the front green where we cannot see them.

If the Council does permit this application, it will set a precedent in other estates around the town and county, that the Council will ignore its own Development Plan and allow developers to build on open space.

### Housing Mix:

The developer of this planning application has already received permission to construct 19 new houses in other parts of the estate. This permission has the reference **201453** on the Council website. We are aware that Tipperary County Council has bought all of these houses from the developer as a turnkey project for social housing.

We engaged a professional architect to look at the house plans for both the approved 19 houses and the proposed 18 houses in this planning application. He told us that the layouts for both schemes are aimed towards the requirements of social houses. The main giveaway being that there are no en-suites in any of the houses. Our architect advised that the government will not build en-suites into social houses.

The last development, other than Springfort Meadows, that we can see on the Council website where Singland Homes received planning permission from Tipperary County Council was to construct 14 houses in Newport. This has the reference **20573** on the Council website. These houses appear to be for a private estate and all of the houses include en-suites.

The site layout drawing (201) in the approved **201453** application showed the location of the 19 houses, but also pointed to the site of this application as “**Phase 2**”. It looks to us that the developer was waiting to see if they could sell the first 19 houses before deciding whether they would develop “**Phase 2**”.



The Council then bought the houses off the plans, and we believe it is evident that the 18 houses proposed under this application have been designed to be attractive to Tipperary County Council, and that the developer intends to sell these to the Council. We would not be surprised if the deal is already in place.

Having reviewed the relevant Planning Act and the Planning Regulations. Our advice is that when a developer receives permission for private houses, they have to give 10% of the houses as social houses and 10% as affordable houses. There are currently **102** houses in Springfort Meadows. The additional **19** new houses already granted permission will bring this number to **121**. If this current application is granted the number of houses will increase from **121** to be **139**, thus increasing the size of the estate by over a third.

We know the first 19 houses have been purchased by Tipperary County Council and it is fairly obvious that current application for 18 additional new houses in "Phase 2" are designed for Tipperary County Council.

The 19 houses already approved will account for **16%** of the houses in the estate once they are built. We believe it is likely that the Council already own a number of houses in the estate and probably are renting other properties in the estate. We have requested this information from Tipperary County Council via Freedom of Information requests, but have not received a response yet on our FOI requests.

If these houses are granted permission, it is likely that the Council will own at least **37** out of **139** houses in the estate. This will be 27% of the houses in the Springfort Meadows estate.

#### **Council Development Land - Stereame Site Nenagh**

Attempts have been made over the last few years by Tipperary County Council to develop the council owned Stereame site, which is literally across the road from the Springfort Meadows estate. We found the proposals to develop Stereame on the national "eTenders" website. The Stereame site can hold over 100 houses and in the eTenders proposal the only mention of social housing is that Part V obligations are to be satisfied, i.e. 10% social housing and 10% affordable housing. Currently the Tipperary County Council website states that "Affordable housing schemes have been discontinued."

We cannot understand how Tipperary County Council believes it is appropriate to shoehorn a large number of social houses, well above the government requirements, into a settled private estate when they will not even use their own undeveloped land to provide social housing.

If planning is granted and the Council purchase these houses, which seems quite obvious to be the plan then it will own at least 27% of the houses in the estate, all of which would be social. The planning regulations recommend 10% social housing mix. We assume that the Government housing policy decided on the 10% level after much consideration as to the correct mix of social housing which should be included in a private housing development.

If the Council applied for permission to convert over a quarter of any private estate to social housing we believe there would be many objections. You only have to look at the trouble the Council had in building more social houses in Cormack Drive to see that, and this was on Council owned land.

We strongly believe that the approach the Tipperary County Council is taking to put nearly 40 social houses into a long established private estate with absolutely no public consultation is a huge abuse of the planning process. This sleight of hand by Tipperary County Council to try by-pass the proper transparent planning process will not go unchallenged by the residents of Springfort Meadows.

Finally, we want to refer the Council to the report "***Social Housing in Mixed Tenure Communities***". This report was published in December 2021 by the ***Housing Agency*** and the ***Irish Council for Social Housing***. The report discusses the best way to ensure that social housing is mixed in well to private housing estates. It has to be said that Tipperary County Council are not following its guidance in the way it is treating the residents of Springfort Meadows.

The report talks a lot about "**tenure blindness**" being critical in the success of integrating social housing into private estates. This basically means that there should be no obvious difference between the private houses and social houses. This is impossible to achieve in Springfort Meadows as it is already common knowledge that these 19 houses from the previous planning permission are for Tipperary County Council and the 18 proposed houses in this planning application if bought by the Council will make a bad situation even worse.

It is clear that Tipperary County Council have no regard for the residents of Springfort Meadows and are quite happy to ignore best planning practice, so they can meet Government targets on social housing to the detriment of the quality of life and social cohesion of the people who live in Springfort Meadows.

It also discusses whether social houses should be spread around an estate, an approach called "**pepper-potting**" or whether the social houses should be kept together in "**clusters**". Many of the people who contributed to the report recommend the pepper-pot approach and it looks like Tipperary County Council usually do this, except when it comes to the Springfort Meadows Estate.

The planning application includes a letter from the Council stating that the developer will sell the Council houses 4, 9, 11 and 14, which looks like the pepper-pot approach. We believe the Council intends to buy all of the houses which will result in a large cluster of houses in one part of the estate, while having another large cluster in the other side of the estate with the 19 houses already purchased.

#### Summary:

- It is obvious that this planning application is in fact **Phase 2** for the previously approved permission to construct 19 new houses in Springfort Meadows;
- The 19 approved houses have been purchased by Tipperary County Council off the plans;
- The 18 houses proposed in this application have been designed to be attractive to Tipperary County Council as social houses;
- If these 18 houses are approved, the useable open space in the estate will fall well below the 15% required in the Nenagh town development plan, which will be the Council setting a precedent for the removal of open space in all other estates in the county;
- The combined 37 new houses, which we strongly believe the Council intend to use as social houses, will result in at least 27% of Springfort Meadows being social houses;
- This is far in excess of the 10% social housing required in a private estate by the government. It is still in excess of the overall 20% if you allow for affordable housing, which the Council say on their own website that they are no longer providing;
- The Council are trying to shoehorn excessive social housing numbers into an estate directly across the road from a huge site that they will not provide social housing on;
- The location of the approved 19 houses and the proposed 18 houses does not match the recommendations of the Housing Agency's own report on mixed tenure housing;
- The way that the Council are attempting to increase the size of a settled private estate by over a third without any public consultation on the impact it will have on existing residents is an outrageous abuse of the planning system.

Regards,

Mairead Redmond and Peter Malone

