

**Morgan, William**

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**From:** mike hogan <[redacted]>  
**Sent:** 28 February 2023 16:21  
**To:** Planning Group  
**Subject:** Re: [External] Fw: Planning objection

CAUTION FROM TIPPERARY COUNTY COUNCIL IT SECTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Willie,

My full postal address is:

Mike Hogan  
104 Springfort Meadows  
Nenagh  
Co Tipperary.

Best Regards,

Mike Hogan



€20 Receipt no: 167324

----- Original message -----

From: Planning Group <planning@tipperarycoco.ie>  
Date: Tue 28 Feb 2023, 16:15  
To: mike hogan  
Subject: RE: [External] Fw: Planning objection

Hi Mike

What is your full postal address?

Kind regards

Willie

**From:** mike hogan <[redacted]>  
**Sent:** 28 February 2023 16:11  
**To:** Planning Group <planning@tipperarycoco.ie>  
**Subject:** [External] Fw: Planning objection  
**Importance:** High

CAUTION FROM TIPPERARY COUNTY COUNCIL IT SECTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.


Good afternoon,

Please be advised the Receipt number for this objection is 167324,

Best Regards,

Mike Hogan

----- Original message -----

From: mike hogan <  
Date: Tue 28 Feb 2023, 15:59  
To: [planning@tipperarycoco.ie](mailto:planning@tipperarycoco.ie)  
Subject: Planning objection

Good afternoon,

Please see attached my objection to planning 2360047,

Best Regards,

Mike Hogan

Singland Homes for an area of green open space in Springfort Meadows estate. This application has the reference 2360047 on the Council website.

### 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 meets this requirement. The map below shows the existing open space and the table shows how the open space requirement is met.



Total Estate Area (m2) (Purple outline)	62,137	<div>TIPPERARY CO. COUNCIL RECEIVED 28 FEB 2023 PLANNING SECTION FILE NO. ....</div>
15% Open Space Requirement (m2)	9,320	
Area 1 (m2)	4,010	
Area 2 (m2)	2,415	
Area 3 (m2)	515	
Area 4 & 5 (m2)	607	
Area 6 (m2) (Site reserved for creche)	788	
Area 7 (m2) (Site of planning permission)	3,764	
Total of Areas 1 to 7 (m2)	12,099 (19.5% open space)	
Total of Areas 1 to 6 (m2)	8,335 (13.4% open space)	
Total of Areas 1 to 5 (m2)	7,547 (12.2% open space)	

The planning submission intends to develop 18 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 creche and was never intended to be open space. If the proposed houses are constructed and the intended creche is constructed at some point in the future, the open space will fall to 12.2%, well below the 15% required by the Council.



We also believe that the small size of Areas 4 and 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, 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 houses in other parts of the estate. This permission has the reference 201453 on the Council website. We now know that the Council has bought these houses from the developer as a turnkey project.

We asked an architect to look at the house plans for both the approved 19 houses and the proposed 18 houses. 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 told us that the government will not build en-suites into 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 he could sell the first 19 houses before deciding whether he would develop "Phase 2".

The Council then bought the houses off the plans, and we believe it is obvious 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.

We have reviewed the Planning Act and the Planning Regulations. Our understanding is that when a developer receives permission for private houses, he has to give 10% of the houses as social houses and 10% as affordable houses. There are currently 102 houses in Springfort Meadows. The 19 houses already granted permission will bring this number to 121. If this application is granted the number of houses will be 139, increasing the size of the estate by over a third.

We know the first 19 houses are for the Council and it is fairly obvious that the 18 houses in "Phase 2" are for the Council too.

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 own a number of houses in the estate already and probably are renting others. We have asked for this information from the Council but have not received an answer yet.

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 estate.

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

We cannot understand how the Council believes it is okay 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 only look for 10% social. We assume that the government 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.

We strongly believe that the approach the Council is taking to put nearly 40 social houses into a private estate with absolutely no public consultation is a huge abuse of the planning process.

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 cannot be achieved in Springfort Meadows as it is already common knowledge that these houses are for the Council. 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.

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 the 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.