

Director of Services, Housing & Social Policy, South Tipperary County Council, County Hall, Clonmel, Co. Tipperary.

Re: Proposed Housing Development at Strylea / Rocklow Road, Fethard.

16th August 2005

A Chara,

On behalf of Fethard & Killusty Community Council I would like to make the following submission regarding the proposed housing development at Strylea / Rocklow Road, Fethard. This submission is made both in respect of the present proposal of twenty houses and ten private sites and the longer-term proposal regarding the far more substantial development of approximately eighty-five houses and ten sites together with a shop and creche.

The issues with which this submission is concerned are of three types –

- 1. Those concerned with the appropriateness of implementing the proposed small-scale scheme in the context of the approach to the overall development of the area
- 2. Those concerned with the nature and scale of the development in the context of the Development Plan and the housing strategies for the area
- 3. Those concerned with the detail of the proposed development.

With regard to item one, it is submitted that the proposed smaller-scale development should not be considered or proceeded with until the overall approach to the development of the area has been considered. It is noted that residential development in this area has, over the years, tended to take place in a somewhat random and uncoordinated manner. It is now noted that a large-scale area to the North of the proposed site of this development is to have a Master Plan prepared for it and that its development will be encouraged when that Master Plan is complete. It is submitted that it is inappropriate to proceed with the present proposal until, at a minimum, the outlines of the proposals in the Master Plan for the adjacent area are clear. It is unsatisfactory for a development of a substantial scale in the context of Fethard to take place in an isolated manner, without having regard to the overall nature of the approach to development in the area.

Secondly, the small-scale development that is proposed at this time is set in the context of a larger-scale development that seems to be in mind. We, however, are not aware of any consideration having been given to the larger-scale proposals, the status of those proposals, the nature of the housing mix that will be contained within the final development or how it is intended that the overall development would take place. It is not appropriate to consider the development of the smaller scale housing scheme until the appropriateness of the approach being taken to the overall development has been considered and approved or amended. It is submitted that the consideration of the overall proposal may give rise to amendments and alterations that would have significant implications for the first phase of the development, where it might be located and the overall design approach being pursued.

In the light of the above considerations I wish, on behalf of the Community Council to object to the proposed development on the grounds that it is premature.

With regard to point number two I wish to make the following submissions.

Nature and Scale of Proposed Housing Provision

While we appreciate the necessity for South Tipp County Council to provide housing for those who are unable to do so for themselves and while we have no objection to the provision of social housing in the town, we are concerned that this provision should be of a nature and at locations that provides an appropriate social mix, that does not give rise to the undue concentration of particular sectors of the community in particular parts of the town and that properly reflects the balance of current housing provision in the area. In this context the provision of a social housing scheme of over 80 units in the one location and in an area where there is a large concentration of such housing already does not seem to be appropriate.

The committee and members of the Community Council feel very strongly about the imbalance between public and private housing development to date in Fethard. Public housing schemes in Fethard (Woodvale Walk, Fr. Tirry Park, Canon Hayes Court, Slievenamon Close, Barrack Street and Kilnockin View) provide one hundred and eighty-one houses¹. In contrast private housing schemes consist of approx. forty-six houses completed (Strylea, Cedar Grove, Cois Falla, Abbey Close) and approx. thirty-three under construction (Killenaule and Cashel roads)². By including the (proposed) additional eighty-five houses this increases the public housing stock to 246 units – a ratio of 3:1.

In the Local Area Plan for Fethard it is stated at Page 9 that "The Council owns 3.9 hectares of land between Strylea and Rocklow Road. Issues regarding the extent of social accommodation in the immediate vicinity of these lands has been raised through the public consultation process of preparing the LAP. In light of such concerns, the Council would consider a mix of public and private development on these lands and the development of individual serviced sites."

It does not appear to the Community Council that the overall approach being taken to the development of this land reflects this undertaking in the Local Area Plan nor does

Public Housing Scheme figures calculated from Register of Electors 2004

Private Housing Scheme figures approximated from Register of Electors 2004 and local knowledge (Developments recently completed and those currently under construction are not included in the 2004 Register)

it reflect the nature of the concerns of the community as acknowledged in the plan. The provision of a small number of private sites does not of itself meet the requirements of this policy.

In addition, the County Development Plan 2003 stipulates that "balanced communities (will be generated) through a range of housing types." It also states that "the social and cultural needs of rural communities will be safeguarded". The Community Council considers that the approach being taken to this area of land is not in conformity with these provisions in the County Development Plan.

In addition to the contravention of the Development Plan Policies, the concentration of all public housing in the one area with extremely limited play / amenity areas has caused many social problems in the past. The Community Council considers that this is a significant factor in Fethard being one of the seven areas within South Tipperary identified by the South Eastern Health Board as being most deprived and that future developments should not exacerbate the problem.

Proposed shop and creche facilities

The basis on which a proposal for shopping and creche facilities at this location is made is not clear and appears to the Community Council to be quite incongruous and, at least with regards to the shopping provision, in contravention of the spirit of the Local Area Plan.

At Page 25 of the Plan it is stated under the heading Policy TOWN. 1: Town Centre –

"It is the policy of the Council to strengthen the town centre function of Fethard as a commercial, cultural and living centre" while at Page 26 the following is stated to be a specific objective: "TC6. The Council will liaise with local retailers, relevant interest and statutory groups to improve the range of retail services available in Fethard town centre and facilitate the coordinated development and promotion of Fethard as a niche retail destination within the county." The Community Council commends these statements in the Local Area Plan and submits that the proposed development is completely at variance with this policy and objective.

Community activists and residents have for some time now been concerned with the closure of many shops in the town in recent years and the subsequent lack of vibrancy in the town centre. Between 1975 and 2002 the number of shops in the town decreased by 59% - a startling statistic. The concept of including a shop in the proposed development would be in danger of exacerbating these trends and would be at material variance with the policies and objectives as contained in the Local Area Plan for Fethard. In addition, given the location of the town centre and the accessibility of shops to existing residential areas, the provision of a shop at this location does not appear appropriate. Neither is it appropriate in the context of current vehicular access to the area and the Master Plan proposed for the large area of land to the North of the proposed site.

With regard to the creche facility the Community Council are currently in the final stages of preparing plans for the redevelopment of the Convent Hall. This development will facilitate the integration of childcare, eldercare and the establishment of a youth centre. Tipperary Institute are at present completing a Feasibility Study on the project which they carried out on our behalf. The inclusion of a creche at Strylea would be a major threat to the proposed development. While it

is acknowledged that there may be an obligation on the Council for the provision of such a facility in the context of an overall housing scheme of the scale proposed, it is also well noted and documented that such provision has been less than successful in ensuring the availability of actual childcare services on the ground. While many such buildings have been provided throughout the country, most have reverted to other uses as it has proven impossible to find childcare providers that are in a position to run a viable service from such facilities.

Also, as with the proposed shop, the location of the facility is problematic in terms of vehicular access and the likelihood that, if provided, it would be used by parents other than those in the immediate vicinity giving rise to additional traffic flows into an already congested area.

The Council is, in all the circumstances, urged to reconsider the provision of the childcare facility at this location and examine the possibility of supporting the childcare proposals being developed by the Community Council as an alternative.

With regard to item three, there are a number of aspects of the overall development that give cause for concern. It is noted in the Local Area Plan that the Council is committed to ensuring high quality design in Fethard. However, the Community Council considers that the proposed development is significantly deficient in this regard.

Firstly, the approach to the overall design is quite unimaginative and very much reflects traditional approaches to housing scheme development. There is no attempt to create imaginative spaces or sub areas with a sense of identity. The approach to the provision of a design mix is also limited and may result in the worst of both worlds - limited variation in design but groups of differently designed blocks that will not necessarily sit harmoniously together.

The design and interior layout of some of the house types proposed is also problematic. The provision of little more than one room on the ground floor is certainly not conducive to family living and will, in our opinion, encourage unfavourable behaviour which will contribute towards anti-social activity in the vicinity.

Furthermore, it is critical that the design of houses, particularly those close to Rocklow Road, are compliant with the Conservation Area Design Guidelines (Appendix 2 FLAP) as they are within view of Sparagoleith, the only remaining gate in the Town Wall - a monument of not alone local but National and European importance. The brick material proposed for use on the exterior of the houses is not appropriate to the historical character of Fethard, as a matter of fact 5.7.0 of the FLAP states that 'brickwork should be avoided.

These are merely our preliminary observations and other comments on the design approach may be made as matters progress.

Conclusion

The Community Council has no objection in principle to the provision of additional social housing in Fethard. However, given the current social mix in the town and the way in which social housing has been constructed in the one part of the town in the past, we consider that such provision needs to be made with great care and thought.

We consider that the development as proposed is unacceptable for a variety of reasons as outlined above — it is premature, it contravenes the County Development Plan and Local Area Plan in many respects and it is deficient in the detail of the design approach. In addition, there are many facilities needed in the town of Fethard and amenities required in the general area of the proposed development, and these should be considered for the lands in question as part of the process of designing an overall scheme for the area. For all of these reasons we object to the development as proposed and urge the Council not to proceed with the development at this time.

The details of the brief presented to the architects for the development of the lands in question are not clear, nor, indeed whether any such written brief was prepared. It is the opinion of the Community Council that the provision of such a brief would be a key element in ensuring that this area of land is developed in a manner that addresses the needs of the community of Fethard in a high-quality and sustainable way. If such a brief was provided to the architects we would welcome an opportunity to view the brief and comment on it. If no such brief was prepared we would request that this be done and that the Community Council be given an opportunity to comment on the brief before it is issued.

Over the past few years we have been in regular contact with various sections of South Tipperary County Council (Forward Planning, Community & Enterprise, Planning, Housing and the County Development Board) in relation to current and future development in Fethard and projects currently being undertaken by ourselves. We are extremely concerned that a development such as the one being proposed would be considered when it directly conflicts with many of the opinions outlined in previous submissions and has such serious implications for the future development of Fethard.

In order to bring this matter to a satisfactory conclusion we request that you establish a forum wherby these issues can be discussed in a specific and co-ordinated way and an appropriate scheme for the development of the land in question be put in place.

Thanking you in anticipation, Is mise le meas,

Edwina Newport (Secretary)

C.C. John Fahey MCC; Denis Landy MCC; Susan Meagher MCC; Michael O'Brien MCC; Eddie O'Meara MCC; Liam Aherne MCC; Tom Hayes TD; Noel Davern TD; Senator Martin Mansergh; John Quinn and Pat Holland, STCC - Community & Enterprise; Denis Holland, STCC - Planning; Hugh O'Brien, STCC - Forward Planning.