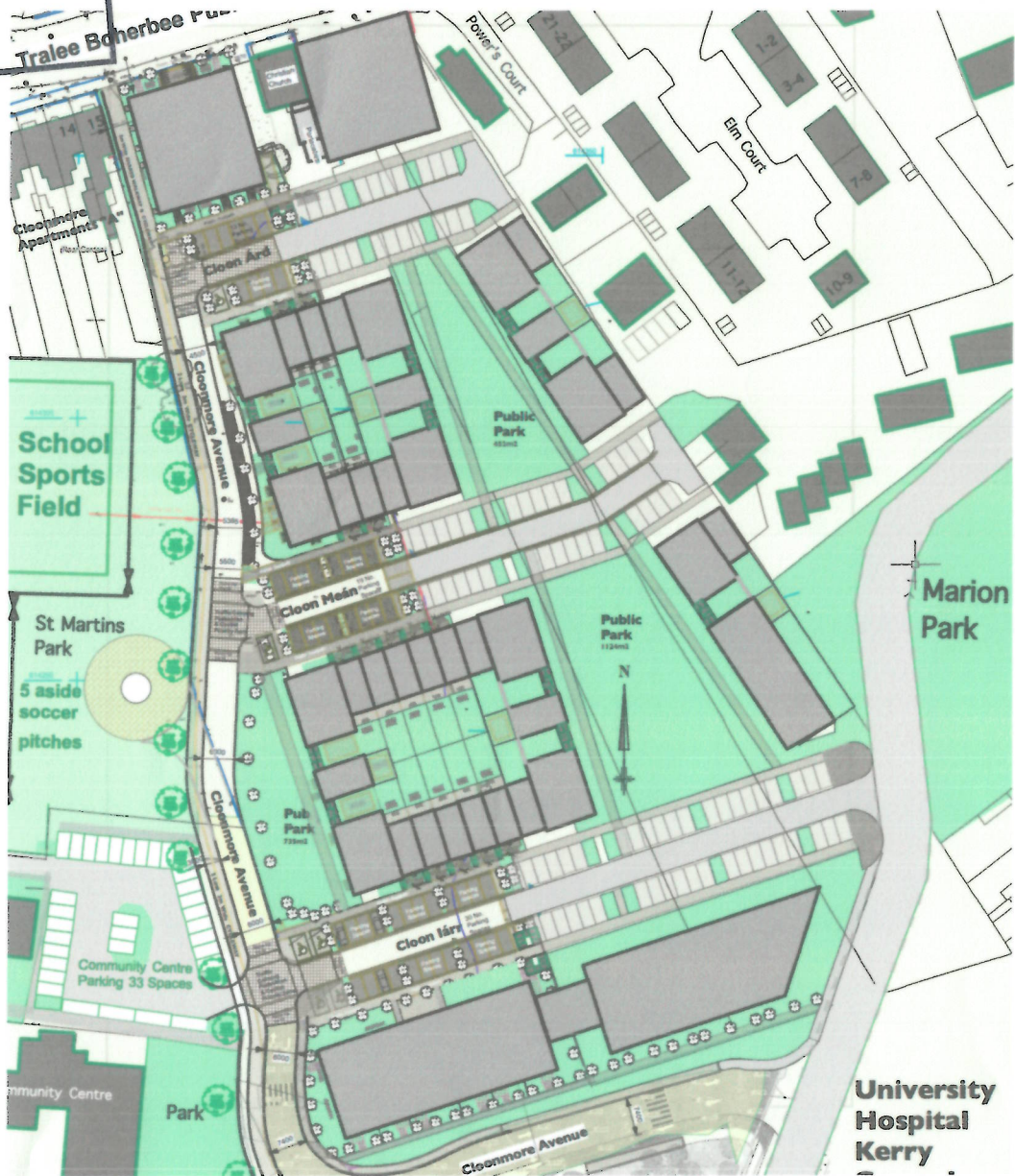


# Observation on Draft County Development Plan 2022-2028

On behalf of

## Tulfarris CG Ltd

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Prepared By

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# Observation on Draft Kerry County Development

**Plan 2022 -2028:**

22 Feb 2022

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Tulfarris CG Ltd ( hereinafter “Tulfarris”) is proposing a major housing development at a **new 2 Hectare Urban Quarter in Cloon More, Tralee**. This proposed development would result in a significant increase in housing supply in Tralee, provide a major investment stimulus for County Kerry, and create significant local employment.

## 1. Proposal for a New Framework Masterplan for Cloon More:

Tulfarris have engaged local professional Architects, Engineers & Planners to develop a detailed Framework Master Plan for the area. A detailed **“Draft Integrated Framework Master Plan”** has been prepared which we are respectfully requesting Kerry County Council include in the new Kerry County Development Plan 2022-2028 (the “KCDP”) as a **“guide diagram ”** to promote and facilitate future development in the area. This is an integrated, realistic and feasible plan that will facilitate a €40+ million development, which can be commenced immediately & realised within the time frame of the proposed **new KCDP**, thereby providing much-needed residential accommodation for up to 500 people in Tralee, close to amenities and employment.

## 2. Cloon More Lands identified by KCC for Redevelopment.

**The 5 one acre sites, comprise existing long linear brownfield sites with old circa 1950’s cottages facing onto the main Tralee road with significant under developed backlands, are specifically identified by KCC as suitable for a strategic residential development in the Tralee LAP as part of the Mitchel’s Regeneration Master Plan: “Draft Systematic Layout of Private Lands”** as well as in the proposed Draft Kerry County Development Plan 2022 – 2028.

### Restrictions Impacting on Development in the Area:

Currently, the area is subject to a Draft Systematic Layout of Private Lands, which we consider to have had the effect of **unduly restricting** the potential for development in the area. Tulfarris’ consultants have identified the following difficulties which pertain under the current layout:

- Inappropriate suburban low density layout
- Inappropriate demolition of a Church
- Unsuitable vehicular access to **R875 Main Tralee Road**, which would result in serious traffic congestion on main road and at the Horan Centre.
- Creates a car-centric design with unnecessary through traffic, a hazard to pedestrians and children in the area.
- Green areas surrounded by roads, thereby reducing the amenity value of these spaces.
- Inappropriately requires sites to be agglomerated and developed as a single entity, making the area realistic phased development unfeasible.
- Highly unrealistic and unviable constraints, which **inhibit alternative proposals** for appropriate development in a phased and orderly manner.
- Failure to adequately integrate the layout and design with wider Neighbourhoods, schools, Community Centre & Creche.

## Alternative Framework Master Plan

Tulfarris seeks to address all these issues with a more realistic alternative **Framework Master Plan**, which can be delivered within the time frame of the new KCDP:

- **Can deliver housing for up to 500 people.** (In accordance with An Bord Pleanála recommendations for higher densities in this location).
- **Provides for €40+ million Phased Development.** (A more realistic and viable approach for orderly viable phased redevelopment of the area, which can commence immediately, which can positively provide immediate investment stimulus in the Kerry economy).
- **Integrates the whole Neighbourhood.** (Not just the 5 acres identified in KCC diagram). **Links to Community Facilities such as Community Centre, Crèche & new School.**
- **Provides 2 access roads from new Clash Link Road** (Avoids congestion on the main Tralee/Boherbee road and around the Horan Centre)
- **Provides safe pedestrian and cycle routes for the area** (and eliminates through traffic).
- **Creates a significant new High Quality Urban Quarter in Tralee.** (With 3 new Streets and a new Avenue and 3 new Parks with attractive Urban design)

### 3. Lands in Private Ownership.

Our clients have outlined a **“Draft Integrated Framework Master Plan”** to promote and facilitate the orderly development of these 5 central Urban Sites, currently in private ownership. Recent obstacles to development are in the process of being addressed with a **Sept 2022 completion date for the Ballymullen/Clash Relief road and new School and Framework Masterplan** to integrate lands in a properly planned, phased and coordinated manner.

**This proposal meets National Policy Objectives** with significant planning gains for Tralee. It is an **Urban Brownfield Site** located in a **Central/Accessible Location** adjacent to:

- **Main Rail & Bus Terminals (within 500m) and two Tralee Bus Service Routes.**
- **Major employment centers in Tralee, Horan Centre, Kerry Co Co, UHK Kerry, IT Tralee, 5 Secondary + Primary Schools etc. all within walking distance.**
- **The Horan Shopping Centre & Amenities**
- **The new side entrance to University Hospital Kerry**
- **Close to 2 Primary Schools, Moyderwell & Presentation (within 500m)**
- **The new 600 Student Gael Scoil and Presentation Secondary School**
- **The School Playing Fields/St Martins Park**
- **Close to Institute of Technology Tralee (within 500m)**
- **It is within 750m walking distance from both the 9 Hectare Tralee Town Park and the Lee River Walk, both major greenbelt amenities.**
- **A major residential development to meet a pre-existing housing demand.**
- **It opens up a crucial 2 Hectare urban land bank for urban regeneration.**

This will create an excellent precedent for good quality medium/high density development.

## 4. Benefits of a Framework Plan.

It is submitted that Kerry County Council can remove obstacles to development set out above and create greater flexibility and certainty by adopting the proposed **“Draft Integrated Framework Master Plan”** for the area. No significant substantial new apartment development has been commenced in Tralee since the 2008 financial crash, while there are 1000 people on the Tralee waiting list for housing, as well as 1000 people on HAP. The proposed development, would provide a major stimulus for Tralee and, as Tulfarris engages predominantly local professionals, builders and tradespeople, it will be a massive income boost for the Kerry region. The **“Draft Integrated Framework Master Plan”** is simply a guide to suitable development pattern and does not in any way limit proper planning control and development.

## 5. The Draft Kerry County Development Plan 2022-2028

It is submitted that the proposed Framework Masterplan can deliver residential development in accordance with the aims and objectives of the draft Kerry County Development Plan 2022-2028, as set out below:

At 4.1, the draft plan notes that:

*“One of the main tenets of the **National Planning Framework** is delivering compact growth within the heart of our towns and villages and is a new direction in planning for the country’s future growth.”*

Furthermore, the draft plan adopts the Programme for Government 2020 ‘Town Centre First’ policy approach, focusing on recognising the town centre’s role at the core of a vibrant community. The draft plan notes, at 4.2.1, that:

*“Kerry County Council aims to achieve this through consolidation, active land management and by prioritising development on infill and brownfield sites. The Plan aims to provide a suitable mix of housing and supporting amenities, co-ordinated investment in infrastructure to support economic competitiveness and create an attractive, high-quality living and working environment.”*

*It is the policy of the Council to recognise and emphasise the potential for greater residential and commercial use within the historic cores of the towns and villages where many opportunities for intensification of residential uses exist.*

In the particular context of brownfield sites (such as the proposed development area) the draft plan notes the following:

### **“4.2.2 Brownfield Sites**

*A number of these development sites have been specifically identified as opportunity sites. These sites will be a key focus for the delivery of sustainable compact growth objectives. These sites are strategic in nature and scale and have been or will be subject to a regeneration plan or master plan. The sites are identified in the three town plans of Tralee, Killarney, and Listowel and in the existing and future local area plans.”*

The theme is continued at 4.3.1, in relation to prioritising Sustainable Infill and Brownfield Development:

*In accordance with RPO 43 Regeneration, Brownfield, and Infill Development a number of sites have been identified in the town plans for potential redevelopment. An increased level of density will be permitted on these sites subject to appropriate design and integration. Additional incentives to develop these lands also applies such as reduced development contributions and parking requirements.*

*It is an objective of this plan to encourage the redevelopment and renewal of town and village cores rather than continual expansion and sprawl of settlements out into the countryside. A target of at least 30% of new housing should be delivered within the existing built-up areas of settlements on infill and/or brownfield sites."*

Finally, the draft Plan makes it an objective of KCC to:

*"KCDP 4-23*

*Prioritise the regeneration of underused town centre and brownfield / infill lands in order to achieve the sustainable delivery of new housing within the existing urban footprint of settlements in the County."*

It is submitted that the proposed Framework Masterplan can deliver development which is consistent with each of the aims and objective set out above.

## **6. Major Planning Gains.**

This proposed development has the potential to offer significant planning gains to the Town of Tralee. On completion it will:

- **Create a new Urban Quarter in Tralee with 4 new internal Streets.**
- **Contribute to New Streetscape on N21-R875 Main Tralee Road.**
- **Create a new Streetscape to New Ballymullen-Marion Park Relief Road.**
- **Deliver up to 200 New Residential Units to cater for up to 500 people.**
- **Deliver a major residential & infrastructure investment in Tralee.**
- **Meet a major demographic & pre-existing housing shortfall of between 1000- 2000 units in Tralee.**
- **Supports sustainable compact urban-based development with reduced commuting needs, more pedestrian friendly development and proximity to existing serviced urban infrastructure.**
- **Integrates the Cloon More, Hawley park & Marion Park Neighbourhoods by interlinking the new Housing, New School, Hawley Park Community Centre, KCC Sheltered Apartments & surrounds.**
- **Provide a new safe Neighbourhood with Walkways & Cycle-ways, linking the New 600 Pupil School, Community Centre, Neighbourhood to N21-R875 & surrounds and reducing anti-social behavior by eliminating significant backlands areas.**
- **Create an excellent precedent for good quality medium/high density residential development to offset the urban sprawl evident elsewhere.**
- **Complies with and is consistent with the stated objectives towards achieving National Policies for higher residential densities in suitable urban sites "National Planning Framework 2040".**

## 7. Existing Sites:

The existing sites comprise a mix of 4 single storey cottages and a guesthouse (Behind the 2 Storey Church) on the main Tralee Boherbee Road and are located close to the Horan Centre Shopping precinct.



Existing Sites 1, 2 & 3 Frontage onto Main Tralee Boherbee road.

## 8. Potential Redevelopment of Sites:

The potential redevelopment of the sites presents us with an excellent opportunity to enhance and redevelop the area.

### Proposed Street Photomontage for new Cloonmore Avenue



Photomontage of North Elevation to Main Tralee Road

Existing 2 Storey Terrace

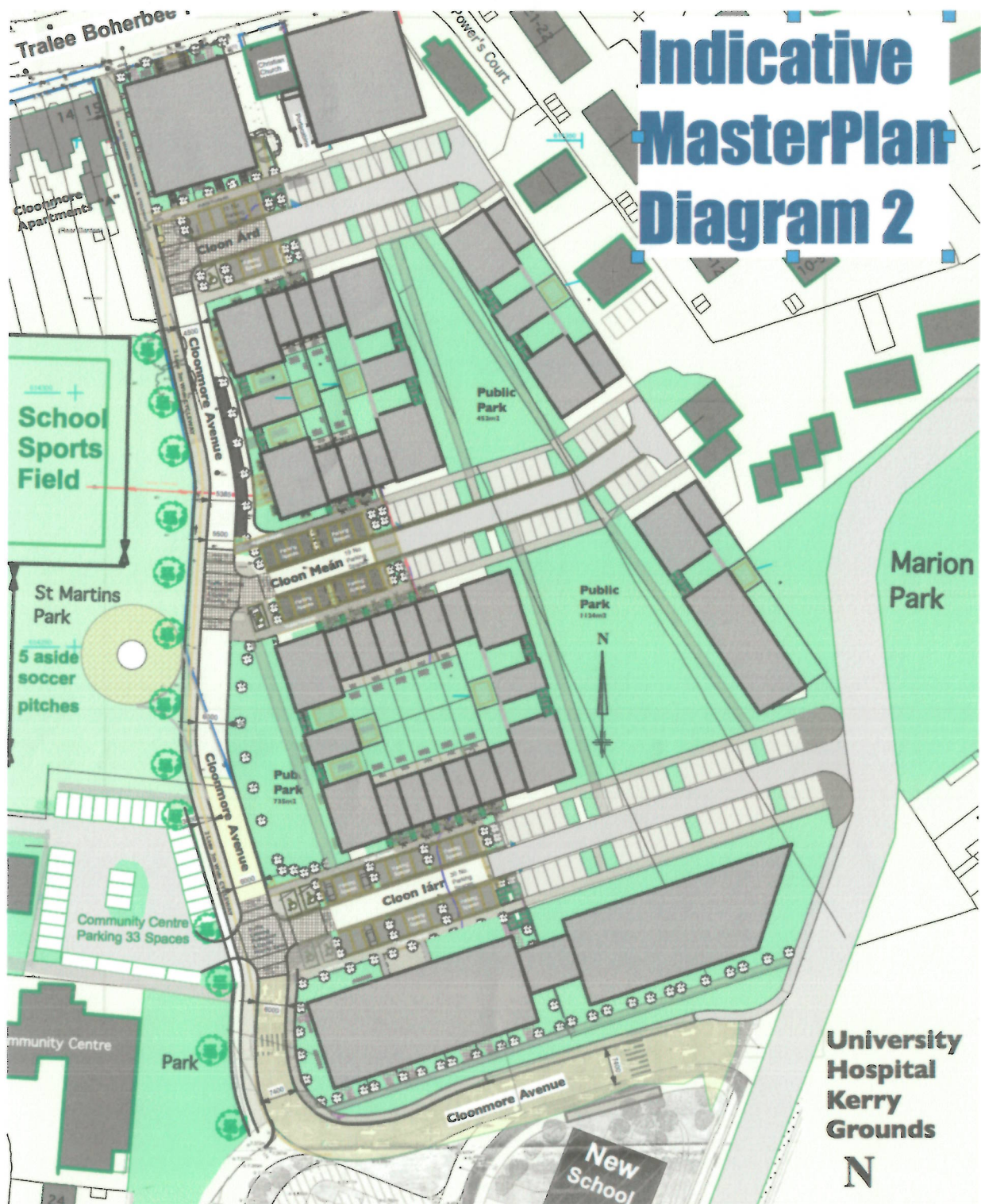
### Proposed Street Photomontage for Main Tralee Boherbee road.

## 9. Indicative Master Plan Diagrams 1 & 2

The Indicative Master Plan Diagrams 1 & 2 demonstrate how we can integrate the 2 Hectare site with the whole 5 Hectares of the neighbourhood currently under redevelopment to provide a coherent, permeable integrated Plan for the whole of Cloon More neighbourhood. This will include 3 Public Parks set within a residential pedestrian zone for optimum security and amenity and surround the development with beautiful open green parkland spaces with lovely urban vistas and amenity.

### Indicative Master Plan Diagram 1





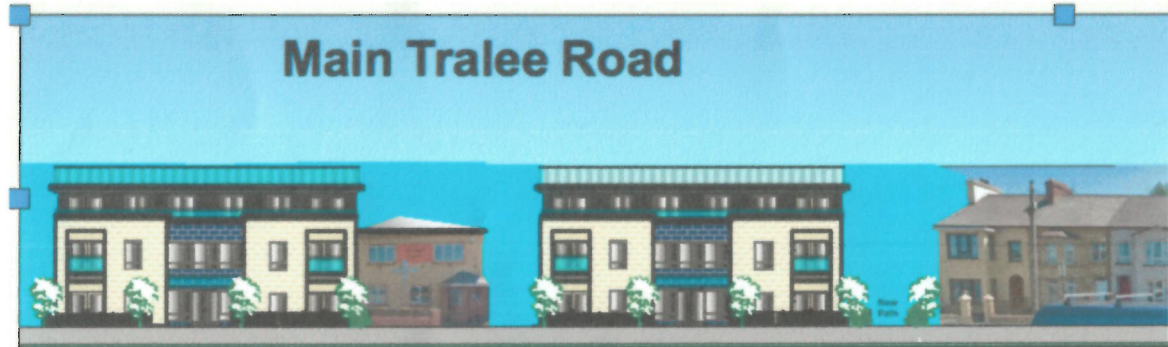
## Indicative Master Plan Diagram 2

The Indicative Master Plan Diagrams shows how Tulfarris can integrate the site with all adjoining lands and demonstrates how lands to the East can be developed in a coherent, orderly and phased manner.



## 9. Images for potential Street Elevations:

The following images show potential street elevation treatments for the proposed development area.



Photomontage of North Elevation to Main Tralee Road



Cloon Meán Street - Developed Master Plan North Elevation



South Elevation to School Access Road & Relief Road

We submit that the high quality high-density residential development set out in the Indicative Masterplan above is an eminently suitable development for the subject, which will positively impact the acute housing need in Tralee. It is on these grounds that my Clients and I respectfully recommend this proposal to Kerry County Council for adoption in the Kerry County Development Plan 2022–2028 .

Yours sincerely,

John Phelan, B.Arch., FRIAI, Chartered Architect