

## CUNNANE STRATTON REYNOLDS

Mr. Damien Ginty, Senior Planner  
Planning Policy Unit  
Kerry County Council  
Rathass  
Tralee  
Co. Kerry  
V92H7BT

## ELECTRONIC SUBMISSION

Our Ref. 20489\_A

21<sup>st</sup> February 2022

## SUBMISSION TO THE DRAFT KERRY COUNTY DEVELOPMENT PLAN 2022-2028

### RE. LANDS AT BALLYVELLY, TRALEE, CO. KERRY

Dear Mr. Ginty,

Cunnane Stratton Reynolds makes this submission to Kerry County Council on behalf of PSA Sugrue Ltd., c/o Gerald Baily & Co. Solicitors, Church Place, Church Street Tralee Co. Kerry.

Our client welcomes the opportunity to make a submission on the Draft Kerry County Development Plan 2022-2028 which is currently on public display inviting comment until 23<sup>rd</sup> February 2022.

Our client is an established and experienced developer who has already delivered Cois Laoi adjacent to the subject site for 64 no. houses. They have also developed Cathair Danaan which is a mixed use development of town houses, apartments and shops as well as An Sean Mhuileann, a development of 114 no student apartments within the town of Tralee. They are committed to the continued proper planning and sustainable development of Tralee as the county town. Tralee is part of the *Kerry Hub & Knowledge Tri-angle* as identified in the Draft Plan Core Strategy that will be fundamental to the fulfilment of County Kerry's role and potential in the Southern Regional assembly area.

As long-time residents of Tralee, they understand the importance of future-proofing the town and do not wish to contribute to flooding issue that have beset it in recent years but at the same time recognise the need for Tralee to remain a vibrant and vital town with a range of housing opportunities. In their development of the existing and immediately adjoining Cois Laoi and the subject lands, our clients have always engaged the services of qualified, independent consulting engineers and hydrologists whose work has demonstrated beyond reasonable doubt and with regard to the available facts that this site should be developed for highly desired housing to meet the current and future needs of the town.

PSA Sugrue seeks to contribute to the attractiveness of Tralee as a place to live and work through the supply of affordable housing close to the town centre and to this end, request the reinstatement of the former residential land use zoning on part of their remaining landholding at Ballyvelly which they have upkept and primed for development throughout the last 10 years for this very purpose, following the previous grant of planning permission for housing and consistent with a formerly held objective of the planning authority.

**CORK OFFICE**  
COPLEY HALL, COTTERS STREET, CORK  
TEL: 021 496 9224 FAX: 021 496 9012  
EMAIL: [corkinfo@csrlandplan.ie](mailto:corkinfo@csrlandplan.ie)

**OFFICES ALSO AT:**  
3 MOLESWORTH PLACE, DUBLIN 2  
TEL: 01 661 0419 FAX: 01 661 0431  
EMAIL: [info@csrlandplan.ie](mailto:info@csrlandplan.ie)

### DIRECTORS

Joe Cunnane BA (Hons) Dip TP MRTPI MIPI: Eamonn Prenter BA (Hons) Dip TP MSc MRTPI MIPI: COPLEY HALL, COTTERS STREET, CORK  
Declan O'Leary BAg Sc (Land-Hort) Dip LA MILI MLI: Jim Kelly BAg Sc (Landscape-Hort) Dip LA MILI CMLI: TEL: 021 496 9224 FAX: 021 496 9012  
Keith Mitchell MA (Hons) LA Dip EIA Dip Arb MILI CMLI: EMAIL: [corkinfo@csrlandplan.ie](mailto:corkinfo@csrlandplan.ie)  
**WWW.CSRLANDPLAN.IE**

This land must be considered in planning terms as 'brownfield' and must therefore be prioritised for rezoning back to residential given that this part of the site is proven in the attached Fluvio R&D Ltd. report as not being prone to flooding. This part of the site was dezoned on the basis of flood risk that did not exist and did not acknowledge that the site levels had been raised under that previous grant of planning permission to accommodate development.

PSA Sugrue hold approximately 4 ha. of land at Ballyvelly that was the subject of planning permission Reg. Ref. 11/7961 (Kerry County Council grant of planning permission upheld under appeal ref. 81.239052). That planning permission identified the north eastern quadrant (nearly 3 ha.) of PSA Sugrue lands for housing with the remainder of the landholding to be subject to landscaping for the purposes of public open space and the delivery of fully demarcated and passively overlooked cycle and walking route along the canal.

It is submitted that the residential development of these lands is a long established development objective of the authority, as evidenced in previous Development Plans and permitted under Reg. Ref. 11/7961 (subsequently upheld under appeal ref. 81.239052) for 52 no. dwelling units at this site. This permission was taken up and substantial site servicing works including the raising of site levels were carried out to facilitate the construction of these permitted houses but, in the face of the construction market crash which was the cornerstone of the last recession, the houses were sensibly not built. However, this brownfield site remains capable of being developed.

It is submitted that the Draft County Development Plan is particularly welcomed by PSA Sugrue as it heralds the first, and most important, step in re-establishing the development direction for the county that due to local government re-organisation and pandemic delays has been reliant on outmoded and outdated Development Plans.

In particular PSA Sugrue is relieved to see the Draft Plan include a Strategic Flood Risk Assessment (SFRA) for the county and for the main towns, including Tralee. Pending this updated SFRA, the authority has substantively relied on generalised CFRAMS material, rather than more accurate more up to date flooding assessment carried out at a site by site level and which saw the residential land use zoning removed from the lands the subject of this submission due to fact that old topography was used.

This submission includes technical assistance in the form of an independent up-to-date flood risk assessment of the subject lands undertaken by Fluvio R&D Ltd., independent expert hydrologists and very much acknowledged experts on the subject of flooding, on behalf of our client, and which is attached to this submission as Appendix 1. This thorough assessment illustrates that the subject lands do not pose a risk of flooding for development on the lands in accordance with the *Flood Risk Guidelines* (i.e. there is no risk of flooding on the subject lands nor increased risk of flooding on adjacent lands as a result of the subject site being developed as originally anticipated).

It is submitted that the portion of lands formerly permitted for 52 no. housing units, is proven by the enclosed flood risk review to not be at risk of flooding and therefore merits reinstatement as a residential development site that is preferable to other lands, it being more proximate to the town centre and already serviced i.e. sequentially this site is preferable over lands further away and not serviced. In addition, it is submitted that the reinstatement of the residential development objective of the lands will allow for the completion of Cois Laoi in the manner that was originally envisaged and will benefit the appearance and legibility of the town on this important approach that is visible from the N86 road. Sustainable transport objectives for the town, along the canal will be fully realised through the reinstatement of the residential land use zoning that will deliver a permeable and safely overlooked sustainable transport link and which takes advantage of existing open space, amenity lands and healthy and active means of transport that are already in place in contrast to other currently zoned residential sites where such amenities and services are planned but not yet available. We believe that prioritisation should be given to sites for residential zoning where the necessary infrastructure and amenities are in place.

For clarification, the authority is requested to reinstate the residential land use zoning objective over those lands that were identified in the Tralee Town Development Plan as *Ballyvelly Area 11* i.e. the northernmost approximately 2.5 ha. Of the landholding at this location. See Figure 1 below.

## 1.0 Location of lands at Ballyvelly, Tralee

PSA Sugrue own lands located between the existing Cois Laoi estate and the canal. The lands are roughly rectangular in shape with as south west to north east to west orientation covering an area of just over 4.4 ha.

The reinstatement of a residential development objective is sought for the northern portion of the lands; immediately adjacent to Cois Laoi over an area of about 3 ha. For ease of reference, the area for which residential land use zoning reinstatement is sought is that area identified as *Area 11 Ballyvelly (2.5ha)* in the Tralee Town Development Plan. The location and extent of the subject site is shown in Figure 1 below.

## 2.0 Planning history

There are several planning decisions which are of significance to this rezoning submission. These are summarised below.

### 2012 ABP Ref. PL81.239052 and KCC Reg. Ref. 11/796

Appeal granted under ABP Ref. PL81.239052 upheld planning permission under Tralee Town Council Reg. Ref. 11/796<sup>1</sup> for 52 no. houses. The grant of permission on appeal, subject to 19 no. conditions did not mandate any reduction in the number of units permitted. However, the imposition of condition no. 2 required alterations to the appeal without impacting upon layout that did not impact overall number of dwelling units.

It is important to note that the housing units granted under this permission lie to the north of the subject landholding i.e. in the area for which residential land use zoning development objective is sought and constituting *Ballyvelly Area 11* as identified at Figure 1.

Furthermore, it is important to note that the aforementioned favourable respective application and appeal determinations considered flood risk assessment. The application and appeal were supported by site specific flood risk assessment in accordance with requirements *Planning System and Flood Risk Management – Guidelines for Planning Authorities*, 2009. The planning authority and An Bord Pleanála adjudged that the development would not be at flood risk nor increase flood risk up or downstream of the site. The authority is reminded to reflect that this information included a review of flood records and site specific and topographical survey and had regard to the historic infilling of the lands as a result of regular canal dredging.

### 2016 Application for extension of duration of planning permission KCC Reg. Ref. 11/397961

This extension of duration application was refused by KCC. The sole reason for refusal<sup>2</sup> referred to the then draft *Shannon Catchment Flood Risk and Assessment Study (CFRAM)* and the land identified at

---

<sup>1</sup> Following local Government reorganisation on foot of the 2014 Act, Tralee Town Council ended and are subsumed into Kerry County Council, original Reg. Ref. therefore altered to 11307961.

<sup>2</sup> *The development would be inconsistent with proper planning and sustainable development of the area having regard to the "Planning System and Flood Risk Management – Guidelines for Planning Authorities" issued by the Minister under Section 28. The Technical Appendices of the Guidelines in relation to flood risk assessment identified CFRAM flood maps / models as a primary source for flood risk Identification. The development site is located in an area identified in the Irish Coastal Protection Strategy Study (ICPSS) and the Shannon Catchment Flood Risk and Assessment Study (CFRAM) at risk of coastal flooding. The CFRAM data and flood extent maps for Tralee were published for public consultation in February 2015 after the preparation of the Flood Risk Assessment submitted with the application.*

risk of flooding under that particular study. It is submitted that the information for that study had been available in the preparation of the site specific flood risk assessment for the lands submitted as part of the original application and appeal that were decided under the same *Flood Risk Guidelines* that continue in force today.

In view of the lack of recourse to appeal for extension of duration applications, and in full knowledge of the lack of flood risk posed by the development, our client took up the above planning permission. They levelled and installed services on the lands for the permitted housing units. In view of the permission nearing expiry a second application for extension of duration was submitted Reg. Ref. 11/387961. This application elicited an acknowledgement from KCC that *substantial works* had been undertaken on foot of the permission and therefore was to be decided under Section 42(1)(a)(i) of the Act as evidenced in the Request for Further Information (RFI) issued in respect of that application. The RFI was not responded to in time and was refused for that reason which remains a matter of bitter regret to our client since they have been unable to complete their original permission.

Since 2017, after significant expenditure on development staging works, our client has continued to retain the services of relevant technical professionals including specialist and nationally recognised flood engineers. They have engaged in all consultation opportunities for the making of statutory development plans over these past years as is evident in the next section.

### 3.0 Current planning context of landholding

The site is in Tralee, within the County of Kerry and thus subject to prescribed statutory development objectives as set out in the current Kerry Development Plan and the Tralee Town Development Plan 2009 – 2015 (as extended).

It is noted that the current Tralee Town Development Plan persists beyond its intended lifespan for reason of; local government reorganisation that *inter alia* subsumed Tralee into Kerry County for the purposes of local administration; the adoption of the Southern Region RSES; and more recent orders and provisions for planning and development statutory plans and permissions seeking to account for delays due to the Covid-19 pandemic.

It is acknowledged by our client that the Tralee Municipal District LAP 2018-2024 was made since the expiration of the planning permission on our client's land, but for this site the Tralee Town Development Plan persists as it is deferred to by the LAP. As such, this Draft County Plan is welcomed by our client as it marks the intended end of the current Tralee Town Plan that, due to its persistence against advances in planning policy, has been subject to 5 no. variations. Table 1 below summarises the variations of the Plan and their impact on the subject lands.

As noted in the last section, our client has sought to maintain the development potential of their lands through physical site works and engagement in planning processes that have been available to them. In reality, those processes have extended only to plan making rather than development application routes as the established residential land use zoning for these lands was removed by variation of the Tralee Town Development Plan.

Variation no. 3 of the Tralee Town Plan in December 2016 that sought to reflect CFRAM indicative only mapping caused the non-completion of the intended residential development. It is submitted that, at that time, the draft CFRAM mapping was at a county-wide scale and just as described 'indicative' and was effectively utilised by the County Council in place of a Strategic Flood Risk Assessment (SFRA), which should have been undertaken.

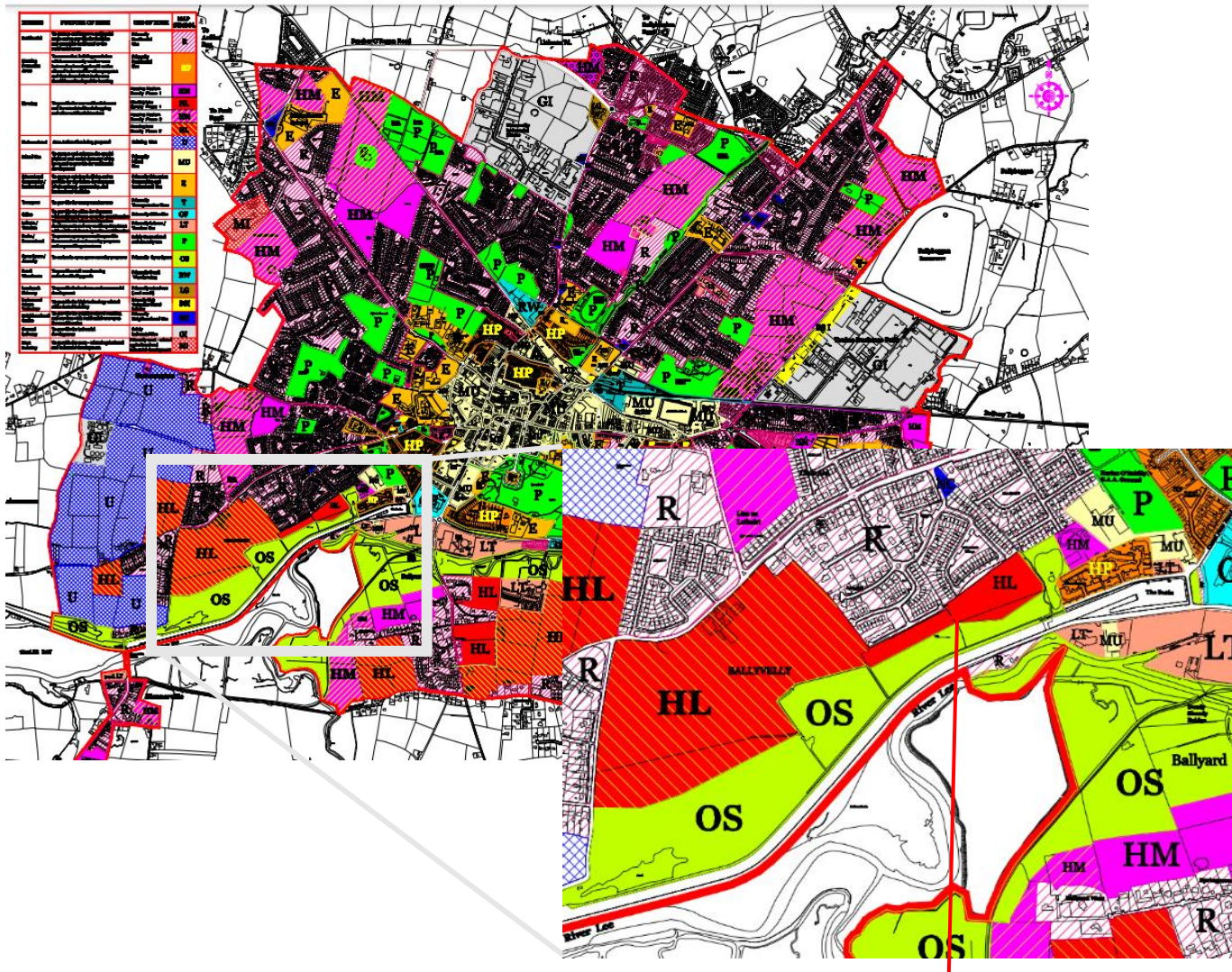
---

*The application for Extension of Appropriate Period would not, therefore, meet the requirements of subparagraph (1)(a)(ii) of Section 42 of the Planning and Development Acts, 2000 to 2015."*

It is further submitted that the subject lands have been subject to site specific flood risk assessment that had been reviewed by the local planning authority and An Bord Pleanála on appeal, against the *Flood Risk Management Guidelines* and had regard to the same baseline information as CFRAMS. The planning application and appeal considerations found the development of the lands in order and permitted same under Tralee Town Council Reg. Ref. 11/796 (appeal Ref. PL81.239052). It is submitted that Variation no. 2 that also considered CFRAMS had a more informed and practical approach to CFRMS recognising that any development on the subject lands ought to be subject to site specific flood risk assessment.

In 2018, subsequent to above variations of the Tralee Town Plan, our client made submission to the making of the Tralee M. D. LAP highlighting that the lands had had works carried out that made them not at risk of flooding and requested the reinstatement of the land use zoning objective. That submission was rejected on the basis of the then CFRAMS mapping and a statement that the infilling (rising) of lands alone did not remove the subject site from 'flood zone A' (a categorising nomenclature from the Flood Risk Guidelines) and therefore the lands were not afforded their land use zoning reinstatement at that time. It is submitted too that, at that time, the authority stated they were not satisfied that the works to raise the subject lands were not done in isolation. In the next section, we summarise a flood risk review of the lands by flood experts that seeks to remedy this misinformed perception. This review has had regard to the Flood Risk Guidelines and assesses the flooding risk of not only the subject lands, but also their potential to cause or exacerbate up and down stream flooding.

It is submitted that the passage of time has allowed for progression and maturation of CFRAM mapping that has now progressed past the Flood Risk Management Plan for the Tralee Bay - Feale River Basin (UOM23), OPW, Feb 2018; the development of the flood relief scheme for Tralee; and the management of flooding on a national, rather than sub-national basis. Maturation of flood risk studies and information means that currently the Draft Plan contains an SFRA that reflects more up to date information and the suitability of the lands for reinstatement of the residential land use zoning objective.



Subject lands for which residential land use zoning objective reinstatement sought ('HL')

Figure 1: Repeat of Tralee Town Development Plan Map no. 1 – development Objectives (after Variation no. 2). Subject lands identified as *Ballyvelly Area 11 – ‘Housing Low Density Phase 1’*

Event	Plan Event Purpose	Impact on Subject Site
Adoption of Plan 2015	<p>Section 115 Housing</p> <p><i>“The main neighbourhood growth areas are primarily located to the south (Cloghers) and west (Ballyvelly) of the town. The potential of these areas for high quality housing, given the quality of the existing natural environment and the orientation towards views and prospects cannot be undermined. However, the scenic nature of these areas means that higher density residential development may not be appropriate in these sensitive locations. As such, these areas are zoned for low density development.”</i></p>	<p>The mention of Ballyvelly indicates that sequentially, our client’s lands were preferred for development that already begun with what is now Cois Laoi.</p>
Variation no. 1	<p>Made to include Core Strategy, match population projections of the then RPGs and reflect:</p> <ol style="list-style-type: none"> <li>1. Shannon International River Basin Management Plan 2009-2015</li> <li>2. Water Framework Directive 2000/60/EC</li> <li>3. The Planning System and Flood Risk Management 2009</li> <li>4. South-West Regional Planning Guidelines 2010 – 2022</li> <li>5. Smarter Travel – A Sustainable Transport Future, New Transport Policy for Ireland 2009-2020</li> <li>6. Kerry Local Authorities Noise Action Plan 2008”</li> </ol>	<p>The subject lands remained a priority development site for recital development for the lands having regard to population projections and planning guidance, including Flood Risk Management.</p>
	<p><i>“Area 11 Ballyvelly (2.5ha)</i></p> <ul style="list-style-type: none"> <li>• <i>This site is located approximately 1.4km from the urban core, taken as The Square.</i></li> <li>• <i>There is roads access to the site, through existing residential development.</i></li> <li>• <i>The site is close to the town centre and its facilities as well as the recreational area of the canal. There is an existing neighbourhood centre close to the site. The site is adjacent to existing residential development.</i></li> <li>• <i>Whilst the site is indicated as being at risk of flooding, the Planning Authority is satisfied that as the lands have been raised by approximately 2m, they are suitable for development. Furthermore any application in the Area will be in</i></li> </ul>	<p>This variation included a phasing assessment of residentially zoned lands as to whether to include lands in Phase 1 or 2 of the Plan. It considered the subject lands at Ballyvelly and Reg. Ref. 7961/16/11 that included a Stage 1 SEA and concluded no negative environmental effect.</p> <p>The assessment summary of Ballyvelly (Areas 11 &amp; 12). The lands for which recital land use zoning objective is sought to be here reinstated were identified as Ballyvelly Area 11. The conclusion of the authority, on sequential testing and serviced lands basis again prioritised the subject lands for development. The flood risk, identified at the highest draft and strategic level was noted, but in deference to the provision for site specific flood risk assessment; the lands remained zoned for development. Not alone were they zoned for development they were identified to be prioritised as phase 1 (2 no. phases) lands for</p>

	<i>accordance with “The Planning System and Flood Risk Management Guidelines for Local Authorities” (DoEHLG 2009). It is noted that these areas were considered to be suitable for residential development under the current Development Plan and its SEA and AA.”</i>	residential development.  See Figure 1: Repeat of map no. 1 Development Objectives with subject site highlighted.
Variation no. 2 – adopted 9 <sup>th</sup> March 2015	<i>“The variation amended the restriction on the development of lands in Phase 2 especially in cases of the landowner or the sons and daughters of the landowner or the favoured niece or nephew of the landowner requiring a dwelling for their full time permanent residence.”</i>	Did not affect the subject lands. Sought to direct new residential development toward town centre and services.
Variation no. 3 – adopted 12 <sup>th</sup> December 2016	<i>“This Variation addresses the following issues:- 1. The Core Strategy 2. Flood Risk Management Guidelines”...</i> <i>“The CFRAM (Catchment Flood Risk Assessment and Management) maps have highlighted lands that are at risk of flooding and are deemed inappropriate for residential development due to the potential flood risk.”</i>  Map no. 1 for Variation no. 2 was deleted and replaced.	The subject lands were removed from the priority residential land use zoning suite and provide the land use zoning development objective: <i>Open /special amenity and Agricultural.</i>
Variation no. 4 – adopted 12 <sup>th</sup> December 2016	<i>“Objective RDP03 supports the construction of service roads in Cloonmore and Cloonbeg. It is now proposed to construct a through road from Cloonmore to Cloonbeg. “</i>	Did not affect the subject lands.
Variation no. 5 – adopted 17 <sup>th</sup> December 2018	<i>“A Tralee Municipal District Local Area Plan 2018-2024 was adopted which included new objectives and policies. It included the population allocation and housing land requirement as contained in the Core Strategy of the Kerry County Development Plan 2015-2021 into the Tralee Town Development Plan 2009-2015.*</i>	The subject lands were identified in the MD LAP and therefore the Tralee Town Development Plan as <i>G5 Mixed/general 'green' /recreation/conservation, other and P1 Agricultural</i>

**Table no. 1 Variations of the Tralee Town Development Plan**



## 4.0 Flood Risk and Draft Plan SFRA

The planning authority is implored to recognise that the *Planning System and Flood Risk Management – Guidelines for Planning Authorities*, 2009 serves a dual purpose – strategic and specific:

**Strategic:** They require the preparation and use of Strategic Flood Risk Assessments (SFRs) in forward planning. SFRAs are required for all statutory Development Plans in order to inform the preferred location for future development from a flood risk perspective only.

**Specific:** They recommend the preparation of site and development specific Flood Risk Assessments (FRAs) to be considered as part of development applications for certain categories of land use and / or at locations that are identified in the SFRA at risk of flooding.

Our client recognises the dual role of the Flood Risk Guidelines and the Draft SFRA part of the Kerry County Plan 2022 – 2028. It is submitted that the ‘*strategic*’ nature of SFRAs is recognised in the Guidelines and in the Scope of the Draft plan SFRA (section 1.4 of the SFRA). It is impractical to perform detailed flood risk assessment for the entire county and therefore the Draft Plan SFRA stated purpose “*is to provide a broad (area-wide) assessment of all types of flood risk to inform strategic land-use planning decisions for County Kerry.*” [our emphasis added]

For towns that have had land use zoning objectives assigned, including Tralee, the Draft SFRA “*has been completed in relation to the proposed land zoning map. This enables Kerry County Council to adopt the sequential approach and to identify where it will be necessary to apply the Justification Test.*” Fluvio has demonstrated in their accompanying assessment that the justification test is not required for the in-filled portion of the subject lands.

The Draft SFRA mapping (Map B) for Tralee is noted to consist of *Fluvial Flood Extent* of predicted flooding at a 1:100 year event and *Coastal flood extent* at a predicted 1:200 year event. The Draft SFRA is referenced in the accompanying Fluvio Report.

It is submitted that overlay of the CFRAMS and ISPPC maps (the old maps shown in Figures 3 and 4 and the updated Figure 5 use updated topographical data are shown respectively in the Fluvio Assessment) indicates that that the risk of flooding is effectively absent on the portion of lands for which residential and use zoning objective reinstatement is sought.

It is submitted that the information that gives rise to this mapping has been reviewed by Fluvio R&D Ltd., independent hydrologists and flood experts. The Flood Risk Review is appended to this submission and takes into account the works undertaken on the lands; their levels; and allowance for climate change. It is submitted that their review represents a detailed assessment of available information and indicates that the lands for which residential land use zoning objective is sought can accommodate dwellings within the site without risk of flooding or to those houses up and down stream.

The planning authority is invited to contact the undersigned, or indeed Fluvio R&D Ltd. as it is suspected that the consultants who prepared the SFRA were not in possession of topographical information for these lands in their preparation of the Draft SFRA that have been made available to Fluvio R&D Ltd.

It submitted that the updating of the SFRA for Tralee with the appended information from Fluvio R&D will fully confirm or re-establish the suitability of the lands for residential land use zoning on the basis of flood risk alone and in this way, the development potential of the lands can be realised.

The Fluvio R&D assessment concludes the following:

1. There is no reason to refuse rezoning of the subject lands for development on the basis of flood risk.
2. The FRA clearly shows that the 'brownfield' portion **(65%)** of the site is located entirely in Flood Zone C and is suitable for 'vulnerable development' as defined by the Flood Risk Management Guidelines.
3. The remaining portion of the site is in Zone A or B and is suited to water compatible development in accordance with OPW Flood Risk Management Guidelines.
4. Access and Egress is not an issue in relation to the 200-year Coastal flooding scenario because the access road through Cois Laoi is at a higher level than the 200-year flood level as shown by the 2015 Shannon CFRAMS flood Maps.
5. Access and egress has been checked for a future scenario which includes Sea Level Rise. The 2021 IPCC report on Climate Change projects sea level rise in the range of 0.44m to 0.76m. For a rise of 0.6m this would result in a depth of 0.3m on the access road which would not pose an issue for emergency access.
6. There is no negative impact on adjacent properties mainly because the critical flooding is Coastal and development on the site would not change tide levels.
7. There is a clear potential for a positive impact on adjacent properties if a short flood levee were to be constructed at the south east end of the lands as shown in the Fluvio R&D report. This would provide flood protection for vulnerable housing in the Knockmoyle area and effectively change the Knockmoyle area from flood Zone A to Flood Zone C.

## **5.0 Other Planning Merits**

### ***Housing Demand***

Please see attached a brief assessment of housing demand in Tralee undertaken by Ger Carmody Auctioneers and Chartered Surveyors. That assessment states the following:

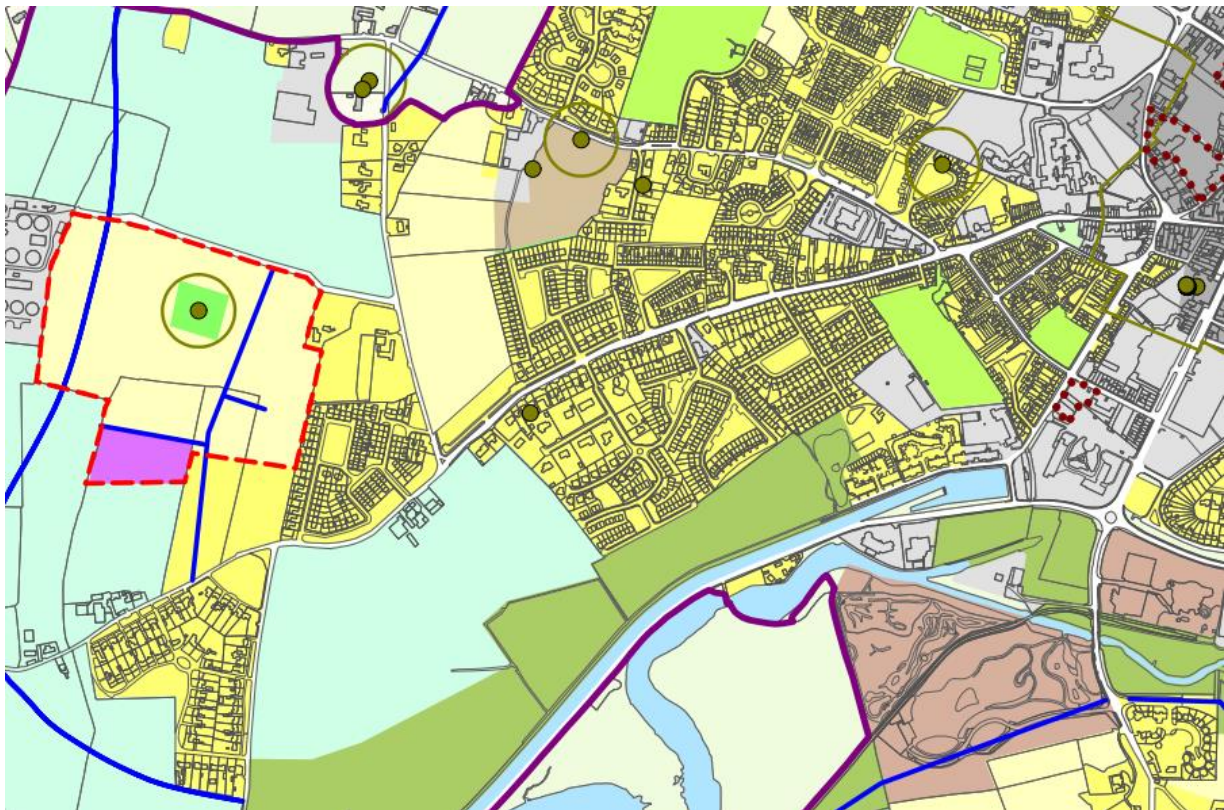
- Population projections set out in the National Planning Framework (NPF), the Southern regional Spatial and Economic Strategy (RSES) have provided population growth projections for the county which have been extrapolated into housing need for Tralee over the period of the emerging Plan.
- Housing targets are found within the Draft County Plan and a target for Tralee of some 2,087 dwellings over the lifetime of the emerging Plan have been identified.
- Ambitious social housing targets have also been identified in the emerging County Plan.
- There is no new private housing development available to the market or in the construction pipeline.
- There is pent up demand subsequent to 10 years of building inactivity with Covid 19 restrictions further dampening supply.
- At present there are only 17 no. 3 bed semi-detached homes available to buy on the market. These units are typically 15 years old or older with average BER ratings of C and D.
- Units previously granted on site are approximately 20sqm bigger than the traditional 3 bed semi-detached built to date in Tralee and thereby offer greater adaptability for family living.
- Continued investment in jobs and tourism in the town will require good quality housing stock.

- There is a chronic shortage of housing units in the town with little in the construction pipeline that will ease that pressure. This site is ready to deliver housing if rezoned.

### ***The Sequential Approach***

The flooding issue is addressed above and in the accompanying supporting documentation. The subject site is preferred over other sites zoned for residential development. Figure 2 below shows sites that are lesser preferred sequentially than the subject site.

**Figure 2:** Excerpt from the Zoning Map contained within the Kerry Draft County Development Plan 2022-2028



The subject site is not only located closer to the designated town centre of Tralee (light grey in Figure 2 above) where public transport, services and infrastructure are greatest and is located nearest existing amenity and open space but is contiguous to existing development as ostensibly an extension to Cois Laoi. Sites that are zoned residential in the emerging County Plan are located substantially further away from the town centre and less well related to existing development are shown in Figure 2 above. In these locations the necessary infrastructure has yet to be provided where they already exist at the subject site. Open space and amenity have yet to be provided in these other locations.

### **Rezoning would be compliant with other Provisions in the Draft County Development Plan**

The rezoning of the subject site would be consistent with other provisions in the merging Plan as follows:

The rezoning of the subject site is consistent with the stated 10 main goals of the emerging Plan which seek to transition the county to a low carbon and climate resistant society and will create attractive vibrant compact settlements that provide a high quality of life for the county's citizens. The requested rezoning is also consistent with the National Strategic Objectives that encourage compact growth, sustainable mobility, enhanced amenity and heritage, and transition to a low carbon and climate resilient society (taken from the NPF).

Section 2 of the emerging Plan requires efficient and effective use of scarce land resources and states that competition for land resources needs to be carefully managed by maximising the re-use of sites and ensuring that the environment is protected and enhanced. Section 2.6.2.1 'Transition to a Carbon Neutral Economy and Society' identifies that there has to be a change to more sustainable settlement patterns. This requires the integration of spatial planning with transport provision and the transition to a low carbon planning and energy efficiency.

Objective KCDP 3-5 promotes the regeneration of underutilised lands. Objective KCDP 3-6 advocates the zoning of land for residential purposes consistent with the Tiered approach outlined in the NPF. The subject site was previously zoned, is serviced, is contiguous to existing development and meets all the requirements of lands that should be zoned under Tier 1. The requested rezoning is consistent with the provisions of Section 4.2 which advocates a town centre first approach – the site being located just outside the defined town centre as shown in Figure 2 above. The requested rezoning would also be consistent with Objective KCDP 4-1 which seeks to achieve sustainable development of land and achieve compact growth.

Finally, the site is located easily within 10 minutes walk of the defined town centre. The rezoning of the subject site would be consistent with the concept of the 10 minute town advocated in Objective 4-14.

## **6.0 Further Requested Change to the Draft Plan**

We request the following additional change to the emerging Plan. Objective KCDP 11-61 states that the County Council will:

*'Take into consideration areas identified at risk of flooding under the CFRAM and ICPSS studies and any other studies/analysis commissioned by the Council/allied state agencies to inform planning policy, development management decisions and capital projects.'*

This objective as currently worded states that the Council will take into account assessments undertaken under CFRAM and ICPSS and any other study or analysis commissioned by any State body to inform development management (planning application and planning appeal) decisions. As worded this would exclude assessments undertaken by non State organisations or by organisations not commissioned by the local authority. This would clearly be unacceptable to applicants and their flood advisors. We request that this objective be reworded to state the following:

*'Take into consideration areas identified at risk of flooding under the CFRAM and ICPSS studies and any other studies/analysis **undertaken by appropriately qualified and experienced organisations** to inform planning policy, development management decisions and capital projects.'*

It is requested that the words '*commissioned by the Council/allied state agencies*' be deleted to be replaced with the above text in bold.

## **7.0 Conclusion**

Our client welcomes the opportunity to participate in the plan making process that will shape the future delivery of the proper planning and sustainable development in Kerry County that will be underpinned by the successful development of Tralee to 2028 and beyond.

This submission seeks the reversion of a portion of PSA Sugrue landholding to its established residential land use zoning objective.

PSA Sugrue a local, experienced developer own lands within the County's capital Tralee that are submitted to constitute a desirable development site for strategic reason of their being within the development boundary of the town and serviced. In more specific terms the lands have a planning history and have already undergone development consisting of the installation of services under the lands in preparation for their being overlain by permitted housing units. This development has already been judged by the authority to be substantial in their consideration of an extension of duration of planning permission Reg. Ref. 11/7961 (grant upheld under appeal ref. 81.239052). It is submitted that previous permission on these lands, from an urban design and sustainable development standpoint represent an extension of the established Cois Laoi housing development that envisaged the development of the lands to complete Cois Laoi's addressment of the canal and the town centre. Without the lands being developed, the opportunity to complete Cois Laoi in a manner to address the canal front and formalise permeability with the town centre is lost.

It is highlighted that technical assistance in the form of independent flood risk review of the lands the subject of this submission has been commissioned by PSA Sugrue. This review is by Fluvio R&D Ltd., independent hydrologists and flood experts and is appended to this submission. The review finds that the land for which residential land use development zoning is sought will not be at risk of flooding nor pose a flood risk elsewhere.

We trust that this submission is of assistance to Kerry County Council and we look forward to its consideration of the above.

Our client would welcome the opportunity to discuss any of the above recommendations in further detail with Kerry County Council.

If any further information is required, please do not hesitate to contact me.

Yours sincerely,



---

Eamonn Prenter

**Director**

## **Appendix 1** Flood Risk Review, Fluvio R&D Ltd



## **Draft Kerry County Development Plan 2022-2028 - Rezoning Submission by Sugrue PSA Limited in respect of Lands at Ballyvelly, Tralee, Co Kerry**

### **Flood Risk Review**



**February 2022**



**FLUVIO R&D Limited**  
Fifth Floor, 5 Lapps Quay, Cork, Ireland  
Tel: +353-21-4863252

Prepared By:

Dr. Eamon McKeogh BSc, PhD, MBA, CEng, MIEI

Dr. Igor Kerin Dip Eng. PhD

FLUVIO R&D Limited

Client:

Sugrue PSA Limited,

Tralee, Co. Kerry

**Draft Kerry County Development Plan  
2022-2028 - Rezoning Submission by  
Sugrue PSA Limited in respect of Lands at  
Ballyvelly, Tralee, Co Kerry**

**Flood Risk Review**

February 2022

**FLUVIO R&D Limited**  
**Fifth Floor, 5 Lapps Quay, Cork, Ireland**  
**email: [eamon.mckeogh@fluvioresearch.com](mailto:eamon.mckeogh@fluvioresearch.com)**



# Introduction

## Background

Fluvio R&D Limited were commissioned by Sugrue PSA Limited to carry out a flood review for lands (4.5ha) at Ballyvelly, Tralee, Co. Kerry (see Figure 1). The lands comprise:

- A 2.925ha area (c65%) which is, in urban planning terms, a 'brownfield' site having been infilled in preparation for the construction of 52 houses (brownfield portion of site is shown in Figure 2).
- The remaining area of land adjacent to the ship canal on which dredged material was placed in 1996.

The flood risk review of the lands overlaid the 2015 Shannon CFRAMS flood maps (OPW/Jacobs) on a topographical survey (2018) of the infilled land. To accurately assess access and egress and impact on adjacent properties, a survey of adjacent properties from 2010 was used.

In addition, a 2021 IPCC summary report on Climate Change which gives projections for sea level rise<sup>1</sup> was used to effectively 'future-proof' the flood risk results given by the combination of CFRAMS flood maps and topographical data.

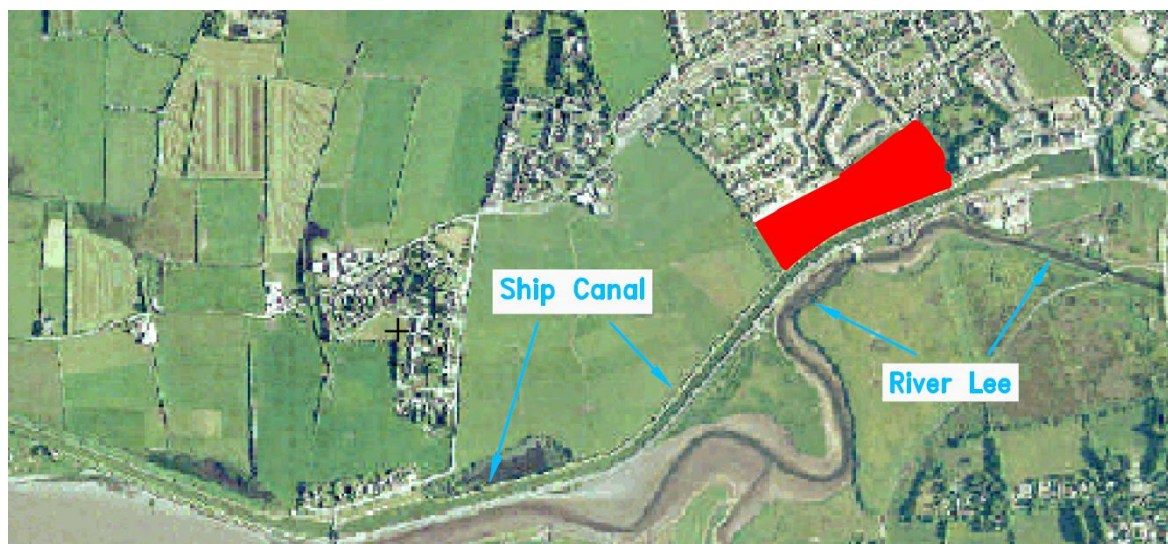


Figure 1. Sugrue PSA lands at Ballyvelly, Tralee marked in red.

<sup>1</sup> IPCC Climate Change 2021 – The Physical Science Basis – Summary for Policy Makers

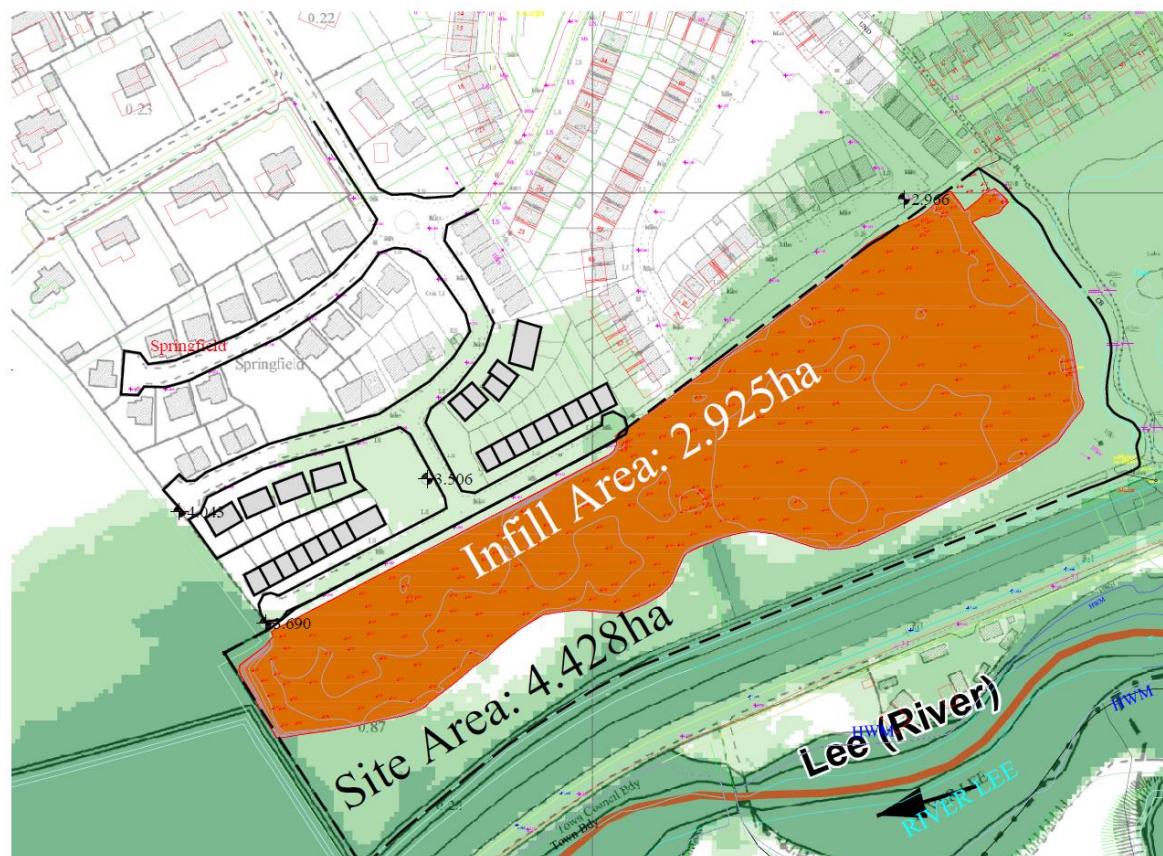


Figure 2. Brownfield infilled portion of lands.

### Site Planning History

**ABP Ref: PL81 .239052; P.A. Ref 11/7961:** An Bord Pleanála granted permission on appeal on 14<sup>th</sup> March, 2012 for the construction of 52 houses, 115 car parking spaces and all associated site works, including pedestrian/cycle linkages with Caheranne village. This application was subject to an extension of duration under Section 42(1)(a)(ii) of the Planning and Development Act, 2000. On 17 May 2016 an application for an extension of duration of planning permission was made and assigned Planning Ref. No. 11397961. The planning permission had not then been taken up, and that application was considered under S.42((1)(a)(i) and was refused on the 4 August 2016 for the following reason:

*“The development would be inconsistent with proper planning and sustainable development of the area having regard to the “Planning System and Flood Risk Management – Guidelines for Planning Authorities” issued by the Minister under Section 28. The Technical Appendices of the Guidelines in relation to flood risk assessment identified CFRAM flood maps / models as a primary source for flood risk Identification.*

*The development site is located in an area identified in the Irish Coastal Protection Strategy Study (ICPSS) and the Shannon Catchment Flood Risk and Assessment Study (CFRAM) at risk of coastal flooding. The CFRAM data and flood extent maps for Tralee were published for public consultation in February 2015 after the preparation of the Flood Risk Assessment submitted with the application.*

*The application for Extension of Appropriate Period would not, therefore, meet the requirements of subparagraph (1)(a)(ii) of Section 42 of the Planning and Development Acts, 2000 to 2015.”*

A rezoning submission will be submitted by Sugrue PSA Limited to the Draft Kerry County Development Plan 2022-2028 in respect of the above lands at Ballyvelly, Tralee, Co Kerry. Considering the fact that coastal flooding risk was given as the reason for the planning extension refusal, this detailed flood risk review has been prepared by Fluvio in support of the rezoning submission.

This flood risk review specifically examined the land in terms of:

1. Identification of Flood Zones in accordance with OPW Flood Risk Management Guidelines<sup>2</sup>.
2. Access and egress.
3. Flood risk impact on adjacent properties.

This study used the Shannon CFRAM data<sup>3</sup> and flood extent maps for Tralee published for public consultation in February 2015 that were referred to in the refusal by Kerry County Council to grant an Extension of the Appropriate Period on 4th August 2016. The CFRAMS maps for Coastal flooding were used to identify flood zones on the Sugrue PSA lands in accordance with the OPW Flood Risk Planning Guidelines.

This study also consulted the RPS Irish Coastal Protection Strategic Study<sup>4</sup> (2019) which gives flood maps for Tralee for coastal flooding extents created by combining the results of tidal and storm surge modelling, statistical analysis, and Digital Terrain Models. The flooding extents map is overlaid on the Sugrue PSA lands in Figure 3 below indicating flooding around the periphery of the site for the pre-infill topography.

The most recent Flood Study which assesses flood risk in Tralee is the ‘Strategic Flood Risk Assessment-Kerry County Development Plan 2022-2028’<sup>5</sup> carried out by MWP in 2021. We can confirm that this study presents both the Shannon CFRAMS and ICPSS Flood Zone Maps as Flood Zone Maps for Tralee (see Figures 5.1 and 5.2 in SFRA-KCD 2022-2028).

It was considered that the CFRAMS flood extents maps gave a slightly more conservative 200-year prediction for coastal flooding extents on the Sugrue PSA site for the pre-infilling scenario (compare Figures 3 & 4) and for that reason the CFRAMS maps were used in our detailed flood risk analysis. Furthermore the CFRAMS maps have a higher resolution.

---

<sup>2</sup> The Planning System and Flood Risk Management-Guidelines for Local Authorities. November 2009. OPW.

<sup>3</sup> Shannon CFRAMS Flood Maps

<sup>4</sup> ICPSS Flood Zone Maps.

<sup>5</sup> Strategic Flood Risk Assessment-Kerry County Development Plan 2022-2028. MWP November 2021.

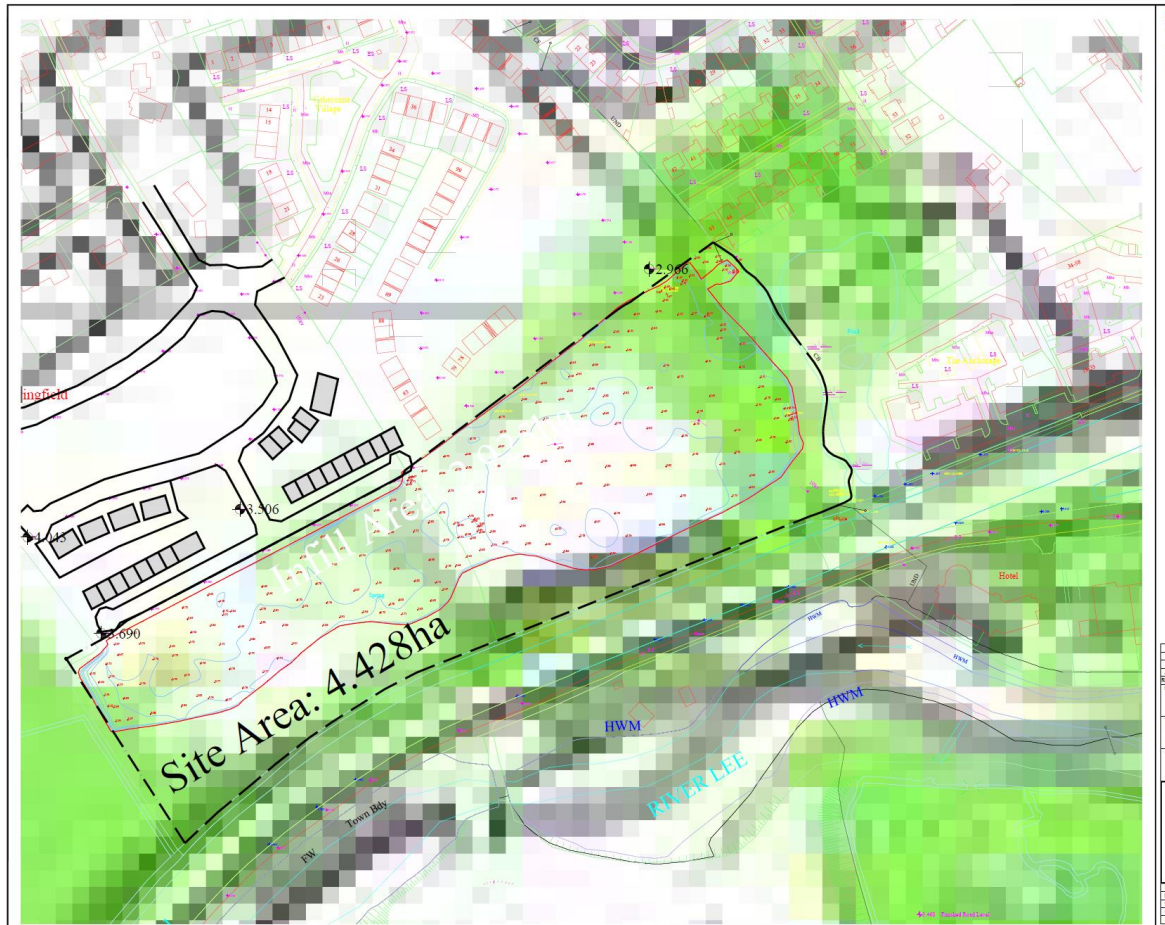


Figure 3. Flood Extents maps produced by ICPS.

## Flood Risk

### Flood Zone assessment

The OPW Shannon CFRAMS maps were used to determine flood zones on the infilled lands. Both Fluvial and Coastal flood maps are available but Coastal flooding is considered more critical with higher flood levels.

From the Coastal flood maps the limits of the flood zones A B & C at the site were determined from a combination of the CFRAMS flood maps and a detailed topographical survey of the lands carried out in 2010 prior to the major infilling. This was done due to the fact that the Shannon CFRAMS flood maps (2015) used topographical data for the site prior to infilling in 2018.

The intersection of the flood Zone A limit-line with 2010 survey contours gives the water level for Zone A as shown in Figure 4. The average intersection height throughout the site is 3.2mOD.

Similarly the limit of Zone B was found to be 3.65mOD. Thus Zone B is between contours 3.2mOD and 3.65mOD. Zone C is above 3.65mOD.

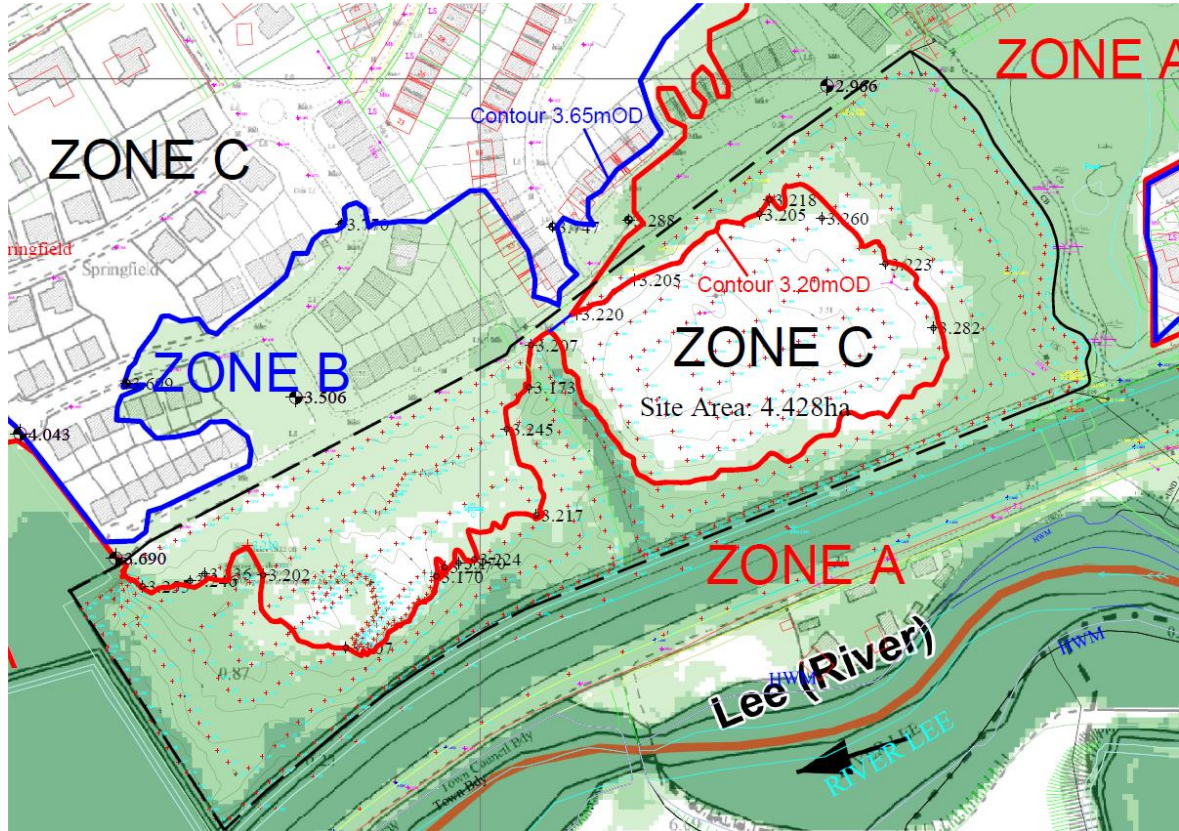


Figure 4. Intersection of CFRAMS flood maps with pre-infill site contours (2010 survey).

A detailed topographical survey of the infilled land was carried out in 2018 and the above flood zone limits have been applied.

- Zone A limit 3.2mOD
- Zone B 3.2mOD to 3.65 mOD
- Zone C >3.65mOD

Figure 5 below shows the flood Zone map that was produced. It is clear that the infilled 'Brownfield' portion of the site is in Zone C and the remainder of the site is in either Zone B or C.

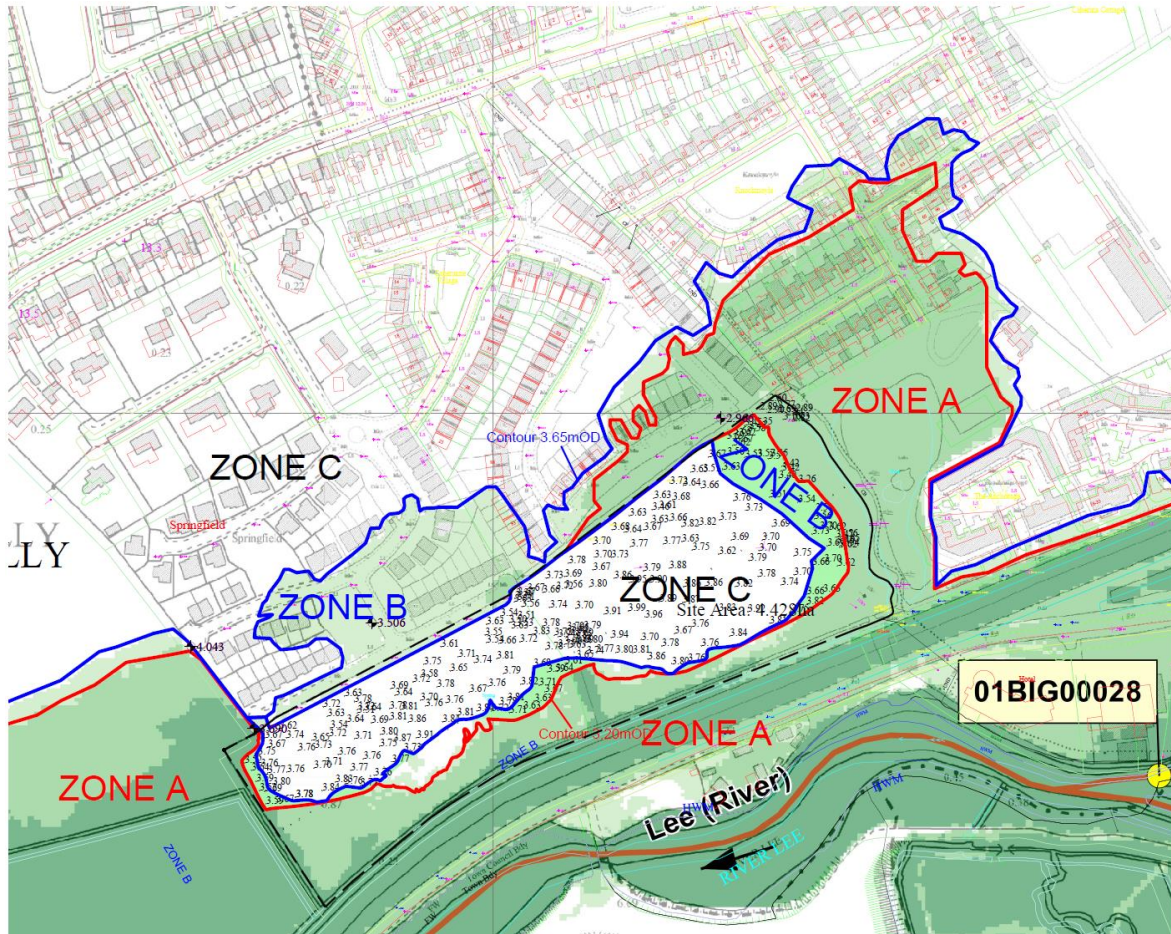


Figure 5. Flood Zones identified on infilled site (2018 survey).

The conclusion is that the Zone C portion of the lands is suitable for highly vulnerable development e.g. housing, as defined by the OPW FRA Guidelines and the remainder of the site is suitable for less vulnerable development such as open space recreational areas associated with housing etc. Table 3.2 below, from OPW Flood Risk Guidelines summarises appropriateness of the site for development and indicates that a ‘Justification Test’ is not required for Zone C.

	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate

Table 3.2: Matrix of vulnerability versus flood zone to illustrate appropriate development and that required to meet the Justification Test.

Source: OPW The Planning System and Flood Risk Management-Guidelines for Local Authorities. November 2009. OPW.

## Access and Egress

Access and egress was assessed by checking if flooding of the main access road to the site occurs for the 200-year Coastal flooding scenario. Using the relevant CFRAMS flood map and spot levels for the main access road through Cois Lee as marked on Figure 6 below. The road levels range from 3.51mOD to 3.7mOD and the access road is within Zone B. With road levels greater than 3.2mOD, the **access road is not flooded for the 200-year Coastal flooding scenario.**

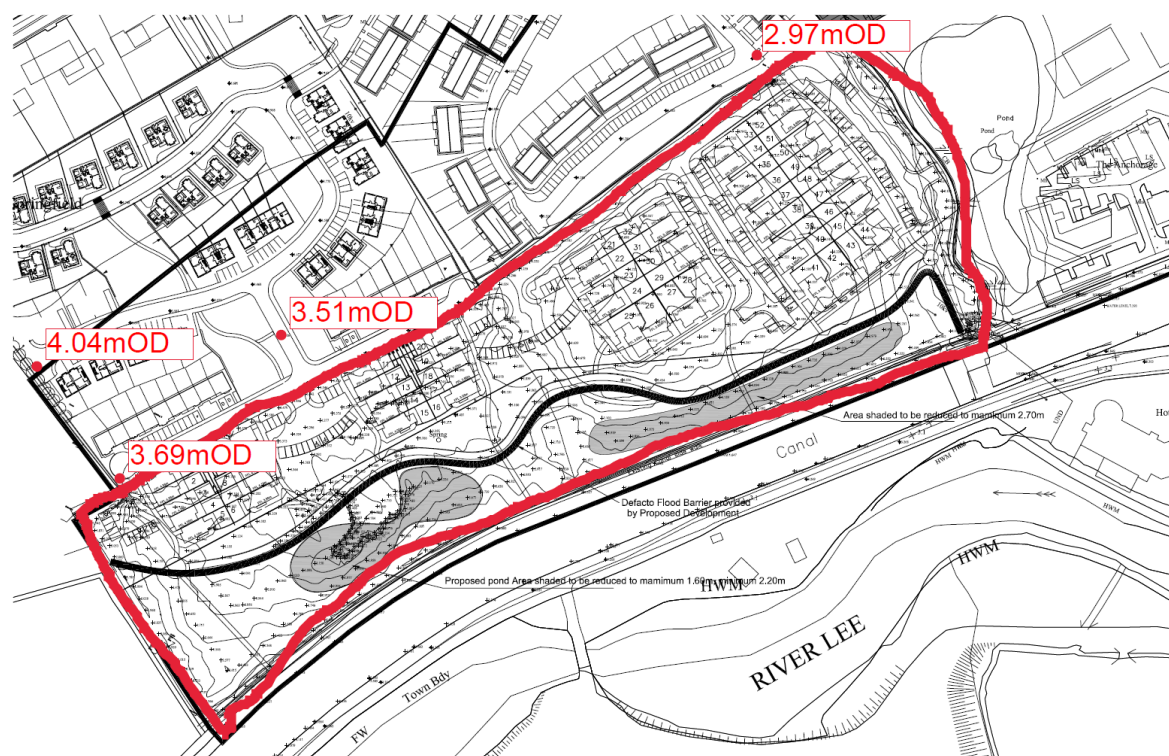


Figure 6. Levels from 2010 survey

## Future Proofing - Sea Level Rise assessment

The long term impact of sea level rise was assessed. The most recent 2021 IPCC report on Climate Change indicates that under the intermediate greenhouse gas emissions scenario, a rise of between 0.44m and 0.76m could occur by 2100. A mid-range value of 0.6m is taken. If 0.6m is added to 3.2mOD the resulting level of 3.8mOD gives a water depth of 0.29m on the access road. This relatively shallow depth would still allow access and egress of emergency vehicles. Even if the more extreme rise of 0.76m is taken for sea level rise (7.6mm/year), there would be no flooding of the access road for over 40 years. Furthermore there is no technical or legal impediment to raising the access road level 300mm since the road is still in the ownership of Sugrue PSA Limited.

## Impact on Adjacent properties

### *Negative impact*

The construction of residential housing on the 'brownfield' Zone C part (Figure 2) of the Sugrue PSA lands will have no impact on either the Coastal or Fluvial flood levels given by the OPW Shannon CFRAMS report for a number of reasons.

1. Coastal is determined tide and storm surge and is unrelated to housing development close to the sea.
2. Fluvial flooding would not be impacted by housing construction on this site since no storage or conveyance changes would occur.
3. Any runoff relating to the development could be attenuated in the usual way using the appropriate SUDS design.

**Conclusion: No negative impact to adjacent properties due to the fact that no flood level increase would occur.**

### *Positive Impact*

With the construction of a small levee incorporating a NRV at the location shown in Figure 7 below, the entire brown field section of the site could be used as a flood protection barrier for the vulnerable housing at the northern end of the site in the Knockmoyle area.

Levels as low as 2.97mOD, as shown in Figure 5 above, indicate that these houses are within Zone A with a high risk of flooding. We are confident that a flood protection scheme could be put in place for this area, involving the development of the Sugrue PSA site and the cooperation of the site owner. If the flood extents shown in Figure 5 are compared with extents shown in Figure 7, the scale of flood protection for the houses around on the North-East end of the Sugrue PSA site (Knockmoyle area) can be clearly seen.



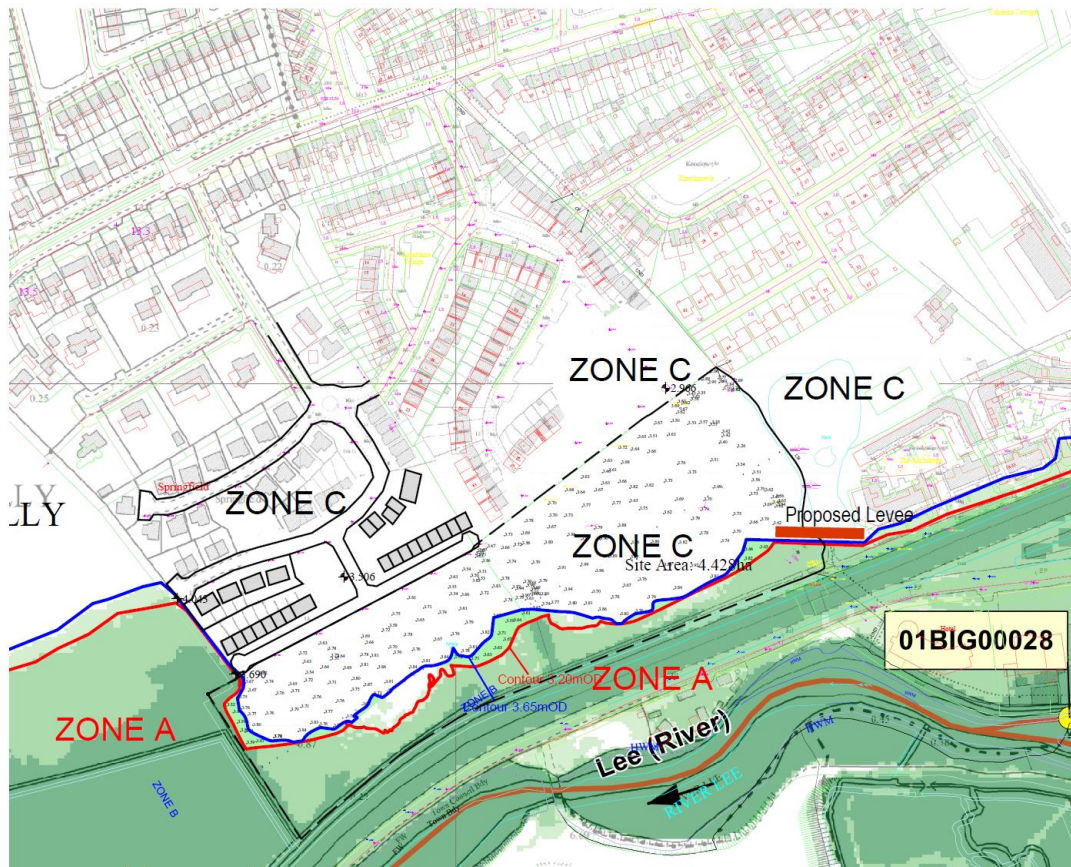


Figure 7. A levee incorporating a Non-Return Valve at the location shown provides extensive flood protection for Knockmoyle area in particular.

## Conclusions

1. This flood risk review specifically examined the lands in terms of:
  - a. Identification of Flood Zones for the lands in accordance with OPW Flood Risk Management Guidelines<sup>2</sup>.
  - b. Access and egress.
  - c. Flood risk impact on adjacent properties.

**This review shows that there is no reason to refuse rezoning of the lands for development on the basis of flood risk.**

2. The FRA clearly shows that the **'brownfield' portion (60%) of the lands are located entirely in Flood Zone C** (see Figure 5 above) and is suitable for 'highly vulnerable development' as defined by the Flood Risk Management Guidelines. A Justification Test is not required for Zone C.

3. The remaining portion of the site is in Zone A or B as shown in in Figure 5 and is suited to water compatible development in accordance with OPW Flood Risk Management Guidelines.
4. **Access and Egress is not an issue** in relation to the 200-year Coastal flooding scenario because the access road through Cois Lee is at a higher level than the 200-year flood level as shown by the 2015 Shannon CFRAMS flood Maps.
5. Access and Egress has been checked for a future scenario which includes Sea Level Rise. The 2021 IPCC report on Climate Change projects sea level rise in the range of 0.44m to 0.76m. For a rise of 0.6m this would result in a depth of 0.3m on the access road which would not be a problem for emergency access.
6. There is **no negative impact** in relation to adjacent properties mainly because the critical flooding is Coastal and development on the site would not change tide levels.
7. There is a **clear potential for a positive impact** on adjacent properties if a short flood levee were to constructed at the south east end of the lands as shown in Figure 7 above. This would provide flood protection for vulnerable housing in the Knockmoyle area and effectively change the area from flood Zone A to Flood Zone C.

## **Appendix 2** Tralee Residential Market Overview Report by Ger Carmody Auctioneers

# GER CARMODY

## AUCTIONEERS

CHARTERED SURVEYORS | ESTATE AGENTS

### Residential Market Overview

Tralee

Prepared By:

Ger Carmody FSCSI FRICS

Edward Street

Tralee

Dated 17<sup>th</sup> February 2022

Edward Street  
Tralee, Co. Kerry  
Tel: 066 7190699  
info@gcauctioneers.ie www.gcauctioneers.ie

Directors: Ger Carmody, Niamh Carmody  
Diane Crean MSc, RICS, SCSi

VAT No: IE 3268394CH  
Registration No: 544795  
PSRA No: 003339



Ger Carmody Auctioneers is a registered trade name of Ger Carmody Auctioneers Ltd.

## Location

Tralee is the capital town and administrative centre of County Kerry with a population of approximately 23,691 based on the 2016 CSO figure. It is the 7<sup>th</sup> largest town and 13<sup>th</sup> largest urban settlement in Ireland. The population of in the county has grown to 147,707 people. Based on the findings of the 2016 census, the population of the Tralee urban electoral area has increased and the main highlights are:

- The Ballyseedy area has seen a 4.5% increase in population recording 1,818 people
  - Blennerville, at 651 people is down 6.7%,
  - The Clogherbrien area is down 10% to 1,481
  - Rathass area is down 1.7% to 1,075
  - Doon area at 692 is down 0.4%
  - Ballynahaglish (Fenit) area is 1,604 up 0.3%
  - The Arabela area is up 7.1% to 1,381
- 
- Tralee is situated approx. (100km) southwest of Limerick City (120km) northwest of Cork City (34 km) northwest of Killarney. The town is well connected by road and rail networks to Dublin, Cork and Limerick and Bus Eireann run frequent regional and national network services. Kerry Airport is a key social and economic asset to the county offering direct flights to Dublin, London, Germany and Portugal
  - The town benefits from a large hinterland which extends to the west as far as Ventry, to the south as far as Waterville and to the north to Lixnaw and Listowel. Such a geographically wide catchment with a population equating to a further 25,000/30,000 people ensure the town is self-sustaining and has managed to see through the economic decline better than other commercial centres nationally
  - Tralee benefits from a range of educational and recreational amenities including The Institute of Technology Tralee, a regional Sports & Leisure Complex and the Aqua Dome. Tralee is most famous for hosting the annual Rose of Tralee Festival. Other services in the town include a District and Circuit Court, Kerry General Hospital and the headquarters for Kerry County Council
  - The newly renamed MTU Kerry offers a wide range of third level courses from diplomas, degrees through to Masters and research. It was established in 1977 as the Regional Technical College and recently merged with Cork Institute of Technology to form MTU Kerry. It has an enrolment of about 3,500 students studying in areas such as business, computing, science, engineering and health. There are two campuses – the North campus (opened in Dromtacker in 2001) and the South campus (opened in Clash in 1977) which are approximately 2.4km (1.5miles) apart. The recently opened Kerry Sports Academy is a state of the art building offering both students and the public access to a universally accessible sports and events facilities.

## Employment

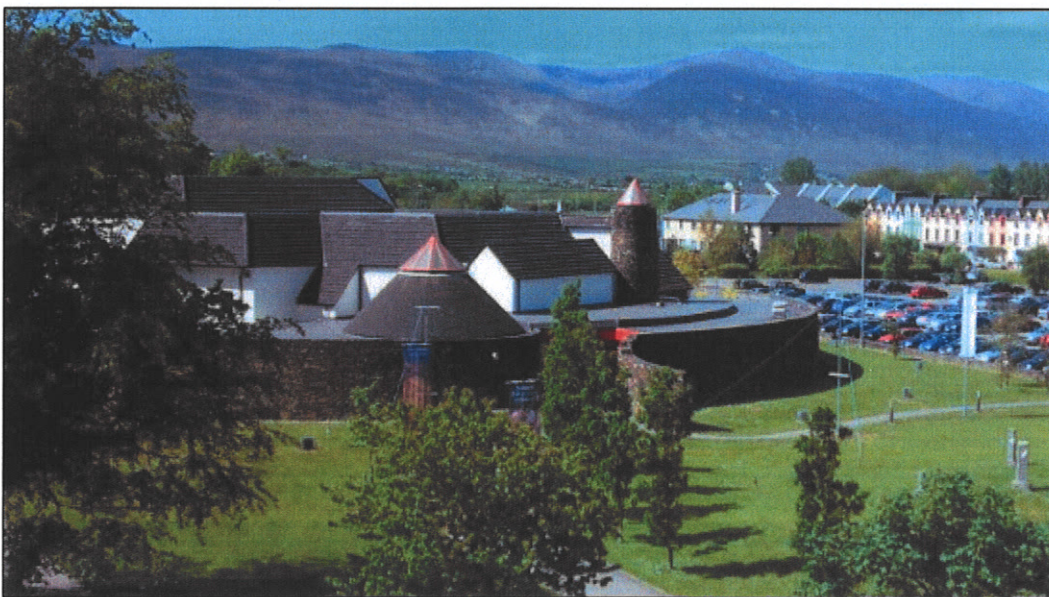
Like all towns and cities in Ireland, Tralee town suffered during the recession with business closures and job losses, however in recent years Tralee has established itself as a business friendly and robust town and is home to a variety of international businesses across all sectors from food, technology and services. A sample of the town's main employers include Kerry Group, Aspen Grove, Kerry University Hospital, MTU Kerry, Kerry County Council as well as the retail and hospitality sector. The Institute of Technology Tralee is key to providing local businesses with skilled and adaptable employees geared to meet ever changing business needs.



## Tourism

County Kerry is ranked as the 4<sup>th</sup> highest attraction for visitors to Ireland and attracts 1.7 million overseas and domestic holidaymakers a year which generates over €420 million in tourist related income for the County. Tralee boasts a magnificent coastline with some of Ireland's best beaches within a short drive such as Fenit, Banna and Ballyheigue. Watersport and outdoor enthusiasts are well catered for from sailing clubs, fishing, swimming, horse-riding and golf clubs in plentiful supply

Tralee is a family friendly centre with key attractions including Aqua Dome, Siamsa Tire, Tralee Wetlands, Blennerville Windmill and Kerry County Museum to name a few. It is also home to a number of annual events ranging from marathons, to food festivals and the world renowned Rose of Tralee Festival benefits the town greatly from the boost in visitor numbers during the summer months



## Residential Market Overview

The housing crisis in Ireland is due to a chronic undersupply of new stock building up over the past decade. Excessively high rents are preventing those on middle incomes from saving for deposits to buy a home and therefore increasing the demand the rental sector. Following years of lack of construction activity after the recession, COVID 19 further delayed new construction progress putting further pressure on an already strained market.

The Government's "Housing For All" strategy launched in September 2021 promises to address this affordability issue by increasing supply and targets to deliver 33,000 new homes a year up to 2030. The overall aim of the housing plan is that 'Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life'. The housing crisis is not just witnessed in key urban cities in Ireland, it is evident in all key urban areas across the country including Tralee, Co. Kerry.

### Kerry Development Plan 2022 – 2028:

As part of the Kerry Development Plan 2022 – 2028, NPF and RSES have provided population growth projections for the County which have been extrapolated to work out housing need targets over the lifetime of the plan. It is forecasted that the population in Co. Kerry will increase by 9,363 people over the period 2022 to 2028 which will result in a housing target of 7,000. It is expected 2,087 new homes will be required in the town of Tralee over this period as shown in the table below:

Settlement		Population & Housing			
		Population 2016 (CSO)	Population 2022 (est)	2022 – 2028 Pop. Growth	Housing Target
<b>County</b>		147,707	156,902	9,363	7,000
<b>Key Town</b>	Tralee	23,691	25,297	2,663	2,087
	Killarney	14,504	15,487	1,630	1,277
		<b>38,195</b>	<b>40,784</b>	<b>4,293</b>	<b>3,364</b>

As part of the Housing for All Plan, ambitious targets have been set for new residential Social Housing developments by Local Authorities to meet current and future social housing needs. The social housing targets for the Kerry County Council as determined by Government is set out in the table below:

Year	2022	2023	2024	2025	2026	Total
<b>Build</b>	315	261	267	287	293	1,423
<b>Long term leasing</b>	31					31
<b>Total</b>	<b>346</b>	<b>261</b>	<b>267</b>	<b>287</b>	<b>293</b>	<b>1,454</b>



## Private Development

In addition to the housing shortage in the social housing sector, the private sector has also been starved of supply with no new developments being constructed in Tralee for over a decade. Daft.ie figures in early 2014 showed there to be **730 units** for sale in Tralee at that time. In mid-2016 the figure had reduced to **380 units** and further reduced to **232 units** as at May 2018. As at today's date this figure stands at **72 units** available for sale. Out of these 72 units, only 16 properties are typical family 3 bed (semi-detached/terraced) houses. This scarcity is preventing first-time buyers being able to secure a starter home, further starving the rental market of supply.

The Governments Help To Buy scheme was introduced in January 2017 as an incentive for first-time buyers to help with the deposit to purchase a new build house or a self-build house. From 23<sup>rd</sup> July 2020 onwards the amount a person could claim increase to the lesser of:

- €30,000
- 10% of the purchase value of a new home or of the approved valuation of the property in the case of self-builds
- The amount of IT and DIRT you have paid for the 4 years prior to making the application

While this is certainly an excellent incentive to assist with affordability it has been of little value to first-time buyers in the Tralee market who are seeking to buy a new build house or apartment.

## Conclusion

From our day to day dealings in the Tralee property market we believe the aspect, design and location of the proposed units in Cois Laoi would be well received by the market. With demand for well-built family homes continuing to rise we would envisage strong demand for these spacious, energy efficient homes as the market has been starved of new houses in Tralee for over a decade. Our key points are as follows:

- At present there is no new private housing development available to the market or in the construction pipeline
- We believe there is a pent-up demand subsequent to 10 years of building inactivity with Covid-19 restrictions further dampening supply
- At present there are only 17, 3 bed semi-detached homes available to buy on the market. These units are typically 15 years old and older with average BER ratings of C and D
- The subject units are approximately 20 sq.m. bigger than the traditional 3 bed semi-detached built to date in Tralee and thereby offer greater adaptability for family living
- With continued investment in jobs and tourism sectors in the town, good quality housing stock will be needed to accommodate and support these initiatives in order to ensure Tralee is an attractive destination

It is clear there is a chronic shortage of housing units in the town of Tralee with little in the construction pipeline that will help ease this pressure in the short to medium term. This highlights clearly that there is an increased demand for good quality, well located product in the town. Should the subject development go ahead we are confident there would be very strong demand for units at Cois Laoi, Ballyvelly, Tralee which would help ease some of the pressure on those in the market seeking to buy a family home.

Yours sincerely



---

Ger Carmody BSc (Hons) FRICS FSCSI