



# Draft Edenderry Local Area Plan 2023 - 2029

Chief Executive's Report - Draft Consultation Stage



March 2023

## Table of Contents

<b>1</b>	<b>Requirement for CE's Report</b>	<b>2</b>
<b>2</b>	<b>LAP Process and Consultation Undertaken</b>	<b>3</b>
2.1	LAP-making process	3
2.2	Methods of Consultation	4
2.3	Submissions	5
<b>3</b>	<b>Summary of Submissions Received Including the CE's Policy Recommendations</b>	<b>6</b>
3.1	Introduction	6
3.2	Submissions	7
3.2.1	Office of Planning Regulator Submission	7
3.2.2	Zoning	14
3.2.3	Environmental	142
3.2.4	Biodiversity and Climate	150
3.2.5	Utilities	153
3.2.6	Transportation	156
3.2.7	Other	169
<b>4</b>	<b>Miscellaneous Changes</b>	<b>172</b>
<b>5</b>	<b>Procedure Following CE's Report</b>	<b>182</b>
<b>Appendix A: Copy of Public Notice</b>		<b>183</b>
<b>Appendix B: List of Persons / Bodies who made submission / observation</b>		<b>185</b>
<b>Appendix C: Prescribed Authorities that were notified</b>		<b>186</b>
<b>Appendix E: Environmental Authorities</b>		<b>187</b>

## 1 Requirement for CE's Report

Planning Authorities are legally obliged to review their existing local area plans and prepare new local area plans. The requirement to undertake this Chief Executive's (CE) Report is part of the wider local area plan making process as set out in the Act.

An LAP is a land-use plan, which details the overall strategy of the council for the proper planning and sustainable development of a town / area<sup>1</sup> over a 6-year period, in this case Edenderry. Put simply, it has the potential to directly impact on the quality of life of every single person in Edenderry. A LAP includes a written statement and maps. A LAP is a material consideration in making decisions on planning applications.

This report is a requirement of section 20(3)(c) of the Planning and Development Act 2000 (as amended) whereby the Planning Authority is obliged to '*prepare a report on any submissions or observations received*' within a specified submission/observation period. Not later than 12 weeks after publishing notice of the preparation of the draft development plan, the planning authority shall prepare the CE report. Therefore, this CE report is required to be circulated to the elected members of Offaly County Council for their consideration.

The CE report is required to be published on the website of the planning authority as soon as practicable following its submission to the elected members.

The CE's Report is required to:

- List the persons or bodies who made submissions or observations.
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR).
- Summarise the submissions and observations made by any other person.
- Contain the opinion of the CE in relation to the issues raised, and the CE's recommendations in relation to the proposed LAP taking account of (a) the proper planning and sustainable development of the area, (b) the statutory obligations of any local authority in the area, and (d) any relevant policies or objectives of the Government or of any Minister of the Government.

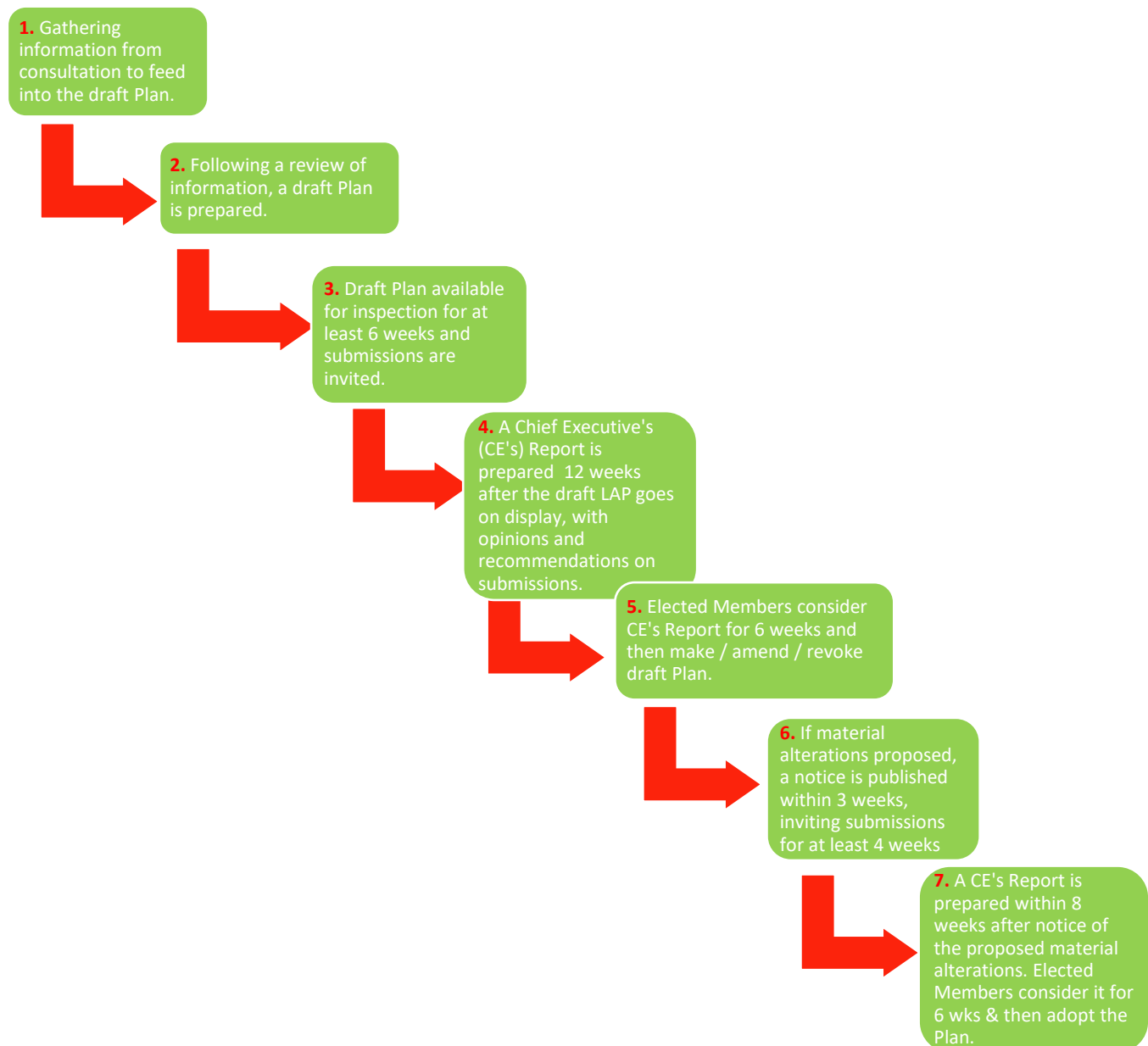
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<sup>1</sup> The Planning and Development Act 2000, as amended requires a LAP to be made in respect of an area, which (a) is designated as a town in the most recent census of population, other than a town designated as a suburb or environs in that census, (b) has a population in excess of 5,000; and (c) is situated within the functional area of a planning authority, which is a County Council. Edenderry fulfils these criteria.

## 2 LAP Process and Consultation Undertaken

### 2.1 LAP-making process

The LAP preparation process involves public consultation at a maximum of three stages, which subsequently leads to and informs the preparation of the final LAP as shown below. The local authority is currently at step 5 in the process below.



## 2.2 Methods of Consultation

The public consultation stage of the draft Edenderry Local Area Plan (LAP) took place from the 15<sup>th</sup> December 2022 to the 3<sup>rd</sup> February 2023 (inclusive).

Public consultation was facilitated through a number of media, namely;

- The draft LAP was uploaded onto a dedicated webpage [www.offaly.ie/edenderrylap](http://www.offaly.ie/edenderrylap).
- Hard copies of the draft plan were available for inspection at the following locations:
  - Offaly County Council, Áras an Chontae, Charleville Road, County Offaly.
  - Edenderry Municipal District, Edenderry Town Hall, O'Connell Square, Edenderry, County Offaly.
  - Edenderry Library, JKL Street, Edenderry, County Offaly.
- The statutory public notice was advertised in locally circulating newspapers, a copy of which is provided in Appendix A;

Local Papers
Offaly Independent
Offaly Topic

- Notification of the draft Plan and a link to the website showing the draft Plan was issued to:
  - The prescribed authorities listed in Appendix C (required under section 20(3)(a) of the Planning & Development Act 2000 as amended, and article 14 of the Planning and Development Regulations 2001 as amended).
  - The Public Participation Network (PPN) who distributed the details of draft LAP on the website and how to make a submission to 143 Edenderry-related community & voluntary groups.
  - Offaly County Council elected members, Oireachtas members, and Planning SPC members.
- Notification of the draft Plan was advertised on the Council's Twitter, Facebook and Instagram accounts.

## 2.3 Submissions

Submissions could be made online through a tailor-made portal, or by hard copy in the post.

31 no. submissions were received within the statutory timeframe for public consultation. The list of these submissions is outlined in Appendix B.

### 3 Summary of Submissions Received Including the CE's Policy Recommendations

#### 3.1 Introduction

This section contains a summary of the 31 no. written submissions received as part of the draft LAP consultation process, and the response of the CE to the recommendations / submissions / observations raised therein.

The CE's response on the issues raised take account of (a) the proper planning and sustainable development of the area, (c) the statutory obligations of any local authority in the area, and (d) any relevant policies or objectives of the Government or of any Minister of the Government.

Submissions are addressed under topics in section 3.2 below. Appendix B of the CE Report lists the reference numbers and accompanying names of persons / bodies who made submissions.

Recommended proposed new text as an amendment to the draft LAP is coloured in red in the CE Responses, whilst recommended text to be removed from the draft LAP is indicated by green strikethrough in the CE Responses.

It is important to note that under section 19(2) '*a local area plan shall be consistent with the objectives of the development plan, its core strategy, and any regional spatial and economic strategy that apply to the area of the plan...*' Members must ensure, that the future growth strategy for Edenderry as set out in the LAP demonstrates consistency with the Core Strategy of the Offaly County Development Plan 2021-2027.

## 3.2 Submissions

### 3.2.1 Office of Planning Regulator Submission

This section examines the submission received by the Office of the Planning Regulator (OPR) by summarising the points raised and addressing them through the CE Responses.

**Ref: ELAP-D-29**

**Person / Body:**

**Office of the Planning Regulator (OPR)**

**Summary of submissions / observations:**

1. The OPR is satisfied that the draft LAP is broadly consistent with the RSES.
2. The Core Strategy Table identifies a projected population increase for Edenderry of 721 over the development plan period. The housing supply target for the same period is 323 units for the town. It notes that 10 hectares of land are required to be zoned new residential and that the draft LAP provides for c. 12.4 ha. The OPR is satisfied with the quantum of new residential zoned land proposed.
3. According to the Planning and Infrastructural Assessment, all three new residential zoned lands promote compact growth and sustainable mobility, are serviced or serviceable within the plan period and are physically suitable and accessible. The OPR agrees with this assessment and is satisfied that the new residential zoned lands are in accordance with sequential development approach and compact growth objectives.
4. The OPR states that the Local Transport Plan (LTP) does not propose improvements to, or provision of appropriate, walking or cycle facilities to serve the 'New Residential' zonings. The OPR requests the inclusion of appropriate policy, objectives and specific measures to prioritise the provision and / or improvement of sustainable and active transport infrastructure connections to / from 'New residential' land use zone parcels including provision for filtered permeability.
5. The submission seeks the amendment of Policy CIO-06 as follows:  
*'To reallocate corresponding roadspace within Edenderry to walking, cycling and public transport to accompany / occur concurrently with the provision of additional roadspace capacity under CIO-05. This may take the form of removing traffic from streets, removing lanes of traffic, narrowing carriageways, traffic management measures, or removing on-street parking to provide cycle tracks or widened footpaths.'*
6. The minimum ambition modal share targets in tables 9.1 and 9.2 for work trips, and most notably for education trips, do not add up. Further, it would appear that modal share for primary-school children, a critical group, has not been taken into account. These should be reviewed and amended.
7. The identification of climate change mitigation actions and climate adaptation actions in table 8.1 (Decarbonisation Actions and Projects) would provide a clearer focus for implementation of climate actions.
8. It would be appropriate to reference the Climate Action and Low Carbon Development (Amendment) Act 2021 and the Climate Action Plan 2023.

9. The OPR states that the RSES identifies the requirement for Edenderry to generate 'catch-up' investment in the local employment and services in order to become more self-sustaining. It is noted that economic development and employment within Edenderry has failed to match the rapid population growth over the past number of years, therefore it is essential the measures are included in the draft LAP to support the economic growth of the town. The consolidation of the employment and enterprise land use zoning through the rezoning of some such land for new residential is a positive approach. The inclusion of the policies and objectives in the LAP promotes Edenderry as a new hub for enterprise and employment and thus generates the catch up investment required to ensure consistency with the RSES and the County Development Plan.
10. All employment areas should be served by sustainable and active modes.
11. The OPR requests that the site appraisals in Table 10.2 of the draft LAP be reviewed to clearly differentiate between those lands that are:
  - Serviced,
  - Serviceable within the plan period,
  - Not serviced or serviceable during the plan period; and

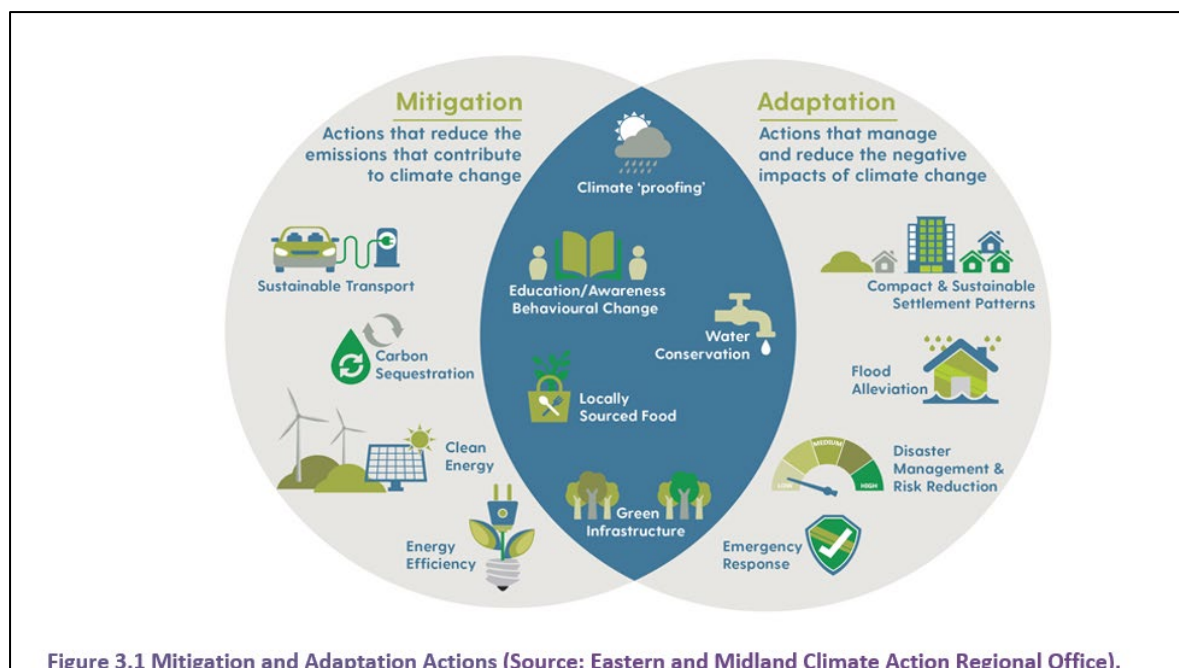
Amend the land use zoning objectives to ensure that lands that are neither serviced nor serviceable during the LAP period are not zoned for development during the plan period.

12. The OPR raises the following queries in their submission: (i) Are there interim solutions before the WWTP is upgraded and when will it be upgraded? (ii) Can the areas of the town where there are wastewater network issues be identified? (iii) What solution can be implemented to resolve wastewater network constraints in the short to medium term? (iv) Is there a strategy for water supply management?
13. The CLU needs to be overlain with the land-use zoning map to assist in assessing flood risk.
14. The submission notes that the Local Transport Plan designates a school site within 'Community Services / Facilities' within the constrained land use zone. According to the Flood Guidelines, lands within Flood Zone A or B should not be zoned for development / uses that are vulnerable or highly vulnerable, respectively, unless they follow the sequential approach and pass the plan-making Justification Test as per box 4.1 of the Flood Guidelines. In addition a new inner / outer relief road is proposed in the LTP within lands designated as Flood Zone A. In accordance with the Flood Guidelines, lands should not be designated to accommodate essential infrastructure within Flood Zone A, or to accommodate primary strategic transport and utilities infrastructure within Flood Zone B, unless it passes the plan-making Justification Test. It will therefore, be necessary to amend the draft LAP to zone lands within Flood Zone A for water compatible uses and to zone lands within Flood Zone B for less vulnerable uses only, unless the subject lands pass the plan-making Justification Tests.
15. The draft LAP indicates that climate change scenarios have been incorporated in the Constrained Land Use area, however, having regard to the OPW mapping [www.floodinfo.ie](http://www.floodinfo.ie), this appears to not be the case. In this regard, the future climate change scenarios should be reviewed and the precautionary approach to flood mapping be applied in order to accurately inform the land use zoning in the town.
16. The County Development Plan identifies two Opportunity Sites within Edenderry, however only one site has been included in the draft LAP, the Blundell Masterplan area, and the rationale for the exclusion of Site 1 is not clear.

17. The OPR advises the consideration of how Chapter 12 'Implementation and Monitoring' could be amended to ensure that any monitoring is strategic in nature consistent with Part 10 of the Development Plans, Guidelines for Planning Authorities (2022).
18. The OPR advises the review of the zoning matrix to omit Business and Technology Park considering there are no proposed zonings of this category in the draft LAP.

#### CE Response:

1. Noted.
2. Noted.
3. Noted.
4. The New Residential zoning near Clonmullen (south of Rosderra) is very well served by the new Inner Relief route, which has good quality cycling lane and footways.  
There is limited scope to improve cycling to lands south of Greenwood Park, as the road width on Fr. Paul Murphy Street would accommodate shared surface only.  
The New Residential land plot in Killane has a proposed relief route which would enhance permeability between Killane Drive and Killane Heights, and also include new footway & cycling links. The proposed section of the Inner Relief Road is illustrated on the draft Zoning map as per my response on submission ELAP-D-25. I therefore do not recommend any further changes to the draft plan on foot of this point of the submission.
5. I recommend amending Policy CIO-06 as follows:  
*'To reallocate corresponding roadspace within Edenderry to walking, cycling and public transport ~~to accompany / occur concurrently with the provision of additional roadspace capacity under CIO-05.~~ This may take the form of removing traffic from streets, removing lanes of traffic, narrowing carriageways, traffic management measures, or removing on-street parking to provide cycle tracks or widened footpaths.'*
6. I refer to my response to submission ELAP-D-14 from the NTA that provides updated Tables 9.1 and 9.2.
7. I note the OPR suggestion to define decarbonisation actions / projects as either mitigation or adaptation, however, some actions / projects can fall into both categories as is evidenced by Figure 3.1 of the County Development Plan below. Accordingly, I do not recommend categorising the decarbonisation projects.



8. The Climate Action Plan 2023 was published after the draft LAP was published. The Climate Action Plan 2021 is referred to in section 8.2 of the draft LAP. I recommend deleting **2021** and replacing it with **2023** in reference to the Climate Action Plan in the draft LAP.

The Climate Action and Low Carbon Development (Amendment) Act 2021 is referred to at the end of section 8.1 of the draft LAP where it states:

‘Such measures strive to adhere to the provisions of the Climate Action and Low Carbon (Amendment) Act 2021 which sets binding targets for greenhouse gas emissions reduction and for the delivery of renewable electricity’.

9. Noted.
10. As per my response under point 4 above and response to submission ELAP-D-25, the inner relief road will significantly strengthen active travel and sustainable travel connections to employment zoned land in the plan area.
11. I consider that it is not necessary to amend Table 10.2 Site Appraisals to detail if specific sites are ‘Serviced’, ‘Serviceable within the plan period’ or ‘Not serviced or serviceable’ as;
- Section 10.2 ‘Methodology’ of the Draft Plan provides the rationale for determining the Draft LAP area in its entirety;

“Whilst the Edenderry Wastewater Treatment Plant (WWTP) is near capacity, it is considered that having regard to the inclusion of the upgrade of Edenderry WWTP in Irish Waters Capital Investment Plan 2020-2024, the willingness of IW to facilitate the provision of necessary infrastructure through developer-led investment, and the generally good service infrastructure in Edenderry, that the Local Plan Area in its entirety can be considered Tier 1 Lands in accordance with Appendix 3 of the NPF.”

- Table 10.2 Site Appraisals already applies a coloured weighting to the ‘Availability of infrastructure and services’ which includes a consideration of wastewater, water and drainage infrastructure.

Notwithstanding this I do recommend that the below map be added to Chapter 10: Planning and Infrastructural Assessment showing all the sites considered for a ‘New Residential’ zoning and considered Tier 1 lands in accordance with Appendix 3 of the NPF;

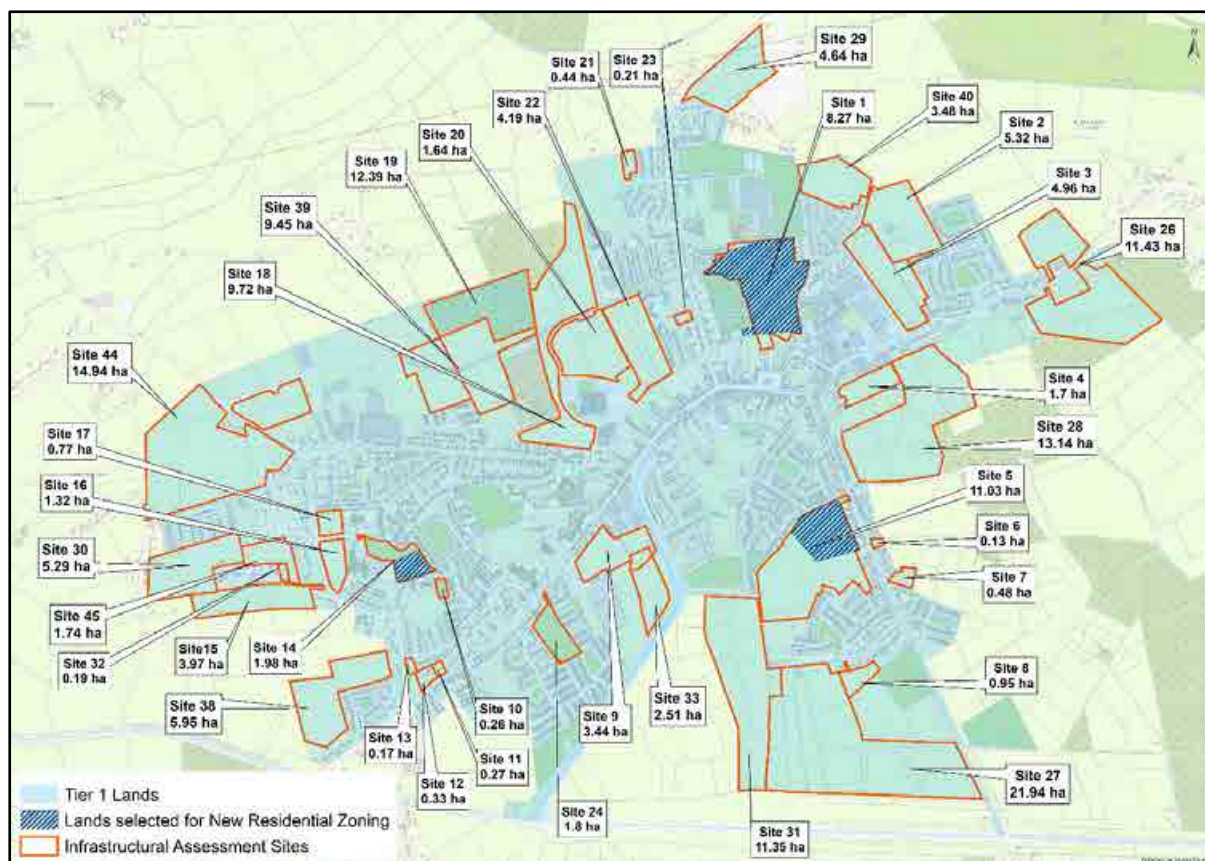


Figure X: Lands categorised Tier 1 and zoned New Residential

12. Based on Irish Water's written submission and further engagement with IW, I recommend the following amendments to particular paragraphs in Sections 10.3.2.2 and 10.3.3.2 of Chapter 10 of the draft LAP:

### 10.3.2.2 Necessary Infrastructure

Whilst there exists ~~limited headroom~~ **no capacity** in the Edenderry WWTP currently; ~~368 population equivalent (PE)~~, this will be increased on completion of the Irish Water upgrade of the plant as included in the Irish Water Investment Plan 2020 to 2024 ~~and is not seen as a long-term constraint.~~ The decision of the selected option is expected to be finalised in June 2023. The chosen solution will be completed within the lifetime of the LAP and will include additional capacity to cater for the population target proposed in the Core Strategy Table. It is estimated that the solution would be in place by the end of 2027, however, this is not exact and could change. Irish Water will continue to liaise with the Council in relation to project progress.

Where new network provision or network reinforcements such as upgrades or extensions are required, these shall be developer-driven. ~~unless there are committed Irish Water projects in place to progress such works.~~ It may be possible in exceptional circumstances, to allow developer-provided treatment to Irish Water effluent standards on their development sites on an interim basis when the Edenderry project is underway. The developer side treatment would have to be taken off line once the Irish Water project is completed. This approach would require;

- Irish Water to be satisfied that the reception of the treated effluent at the Edenderry WWTP would not result in a reduction in treatment efficiency and
- The Council to accept that the discharge of treated effluent to the network on a short-term basis would not have any additional negative effect on the receiving water that the Irish Water WWTP discharges to.

New connections to Irish Water networks are subject to their Connections Charging Policy.

The Edenderry Public Water Scheme produces approximately 2,113 m<sup>3</sup>/day of water. Raw water is abstracted from the Kishawanny and Edenderry boreholes. ~~Having regard to the constrained/limited water supply capacity, 368 PE, where new network provision or network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Irish Water projects in place to progress such works.~~ Based on the proposed population projections in the Core Strategy, and the timeframe of the LAP (2023-2029), there should not be any constraints on water supply for Edenderry subject to the promotion of Water Conservation and leakage control. New connections to Irish Water networks are subject to their Connections Charging Policy.

### 10.3.3.2 Necessary Infrastructure

The public sewer network in the town is considered satisfactory subject to limited local upgrades in certain parts of the town. ~~The Council will have regard to proposed solutions to address deficiencies in the town's drainage network identified in the Irish Water Drainage Area Plan for Edenderry during the Local Area Plan period. In the interim, these solutions can be developer-driven/funded in accordance with the requirements of Irish Water's Connections & Charging Policy. Irish Water can only make a determination where an application is received and the site location and size of development is known. Irish Water can work with developers in the development of solutions for particular sites which could include such actions as, the removal of storm water from combined sewers, on-site storage or local sewer upgrading.~~

13. The CLU is overlain with the zoning map as set out under submission ELAP-D-17 in this CE Report.
14. This issue is responded to in the CE Response to the OPW submission Ref ELAP-D-17.
15. This issue is responded to in the CE Response to the OPW submission Ref ELAP-D-17.
16. The County Development Plan will be varied to address the difference of opportunity sites between both plans. The Council wishes to focus its efforts on the Opportunity site upon which the Blundell Masterplan has been prepared.
17. Chapter 12 states that 'It is considered that the implementation of the plan would be best focused on anticipated/proposed key, strategic and practical outcomes of the plan'. This is also stated in Chapter 14 of the Offaly County Development Plan 2021-2027. I do not recommend any further amendment on this point.
18. I recommend omitting the zoning category '~~Business and Technology Park~~' from Table 11.2 Land Use Zoning Matrix, and removing section 11.4.7 from Chapter 11, and renumbering paragraphs that follow it.

### ~~11.4.7 Business/Technology Park~~

~~This zoning facilitates opportunities for technology based industry and advanced manufacturing, compatible office space and research and development based employment~~

~~within high quality, highly accessible, campus style settings. The zoning accommodates locations for high end, high quality, value added businesses and corporate headquarters. An emphasis on high quality sustainable design and aesthetic quality will be promoted to enhance corporate image and identity.~~

**~~Land Use Zoning Objective – Business/Technology Park~~**

~~It is an objective of the Council to:~~

**~~LUZO-08 Provide for technology based light industry, research and development and compatible offices in a high quality built and landscaped environment.~~**

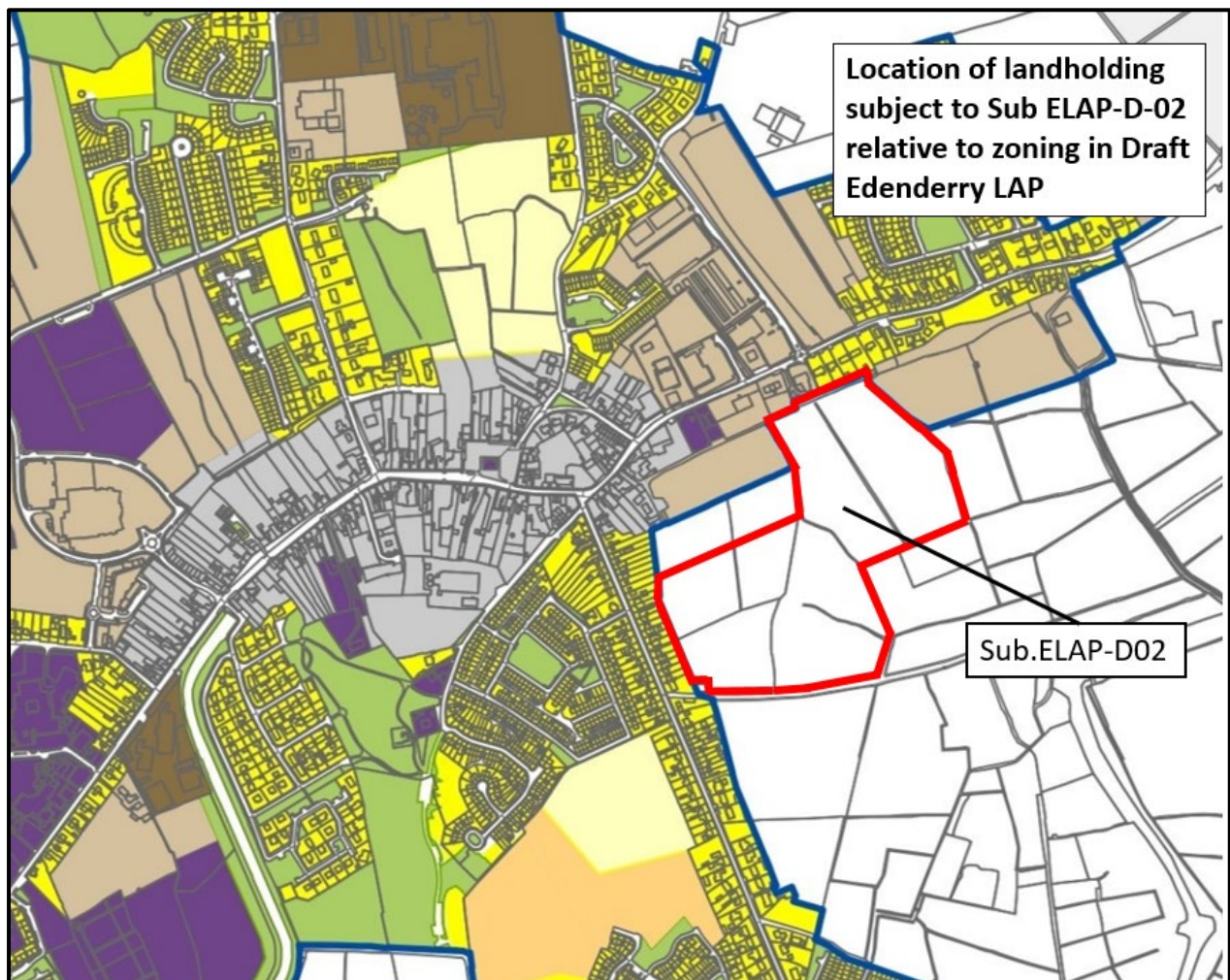
### 3.2.2 Zoning

**Ref: ELAP-D-02**

**Person / Body: Martin Mason**

**Summary of submissions / observations:**

This submission proposes that the subject site be zoned for residential purposes due to its central location, as a new sewerage pipe runs through the site and the proximity of the site to a local pumping station.



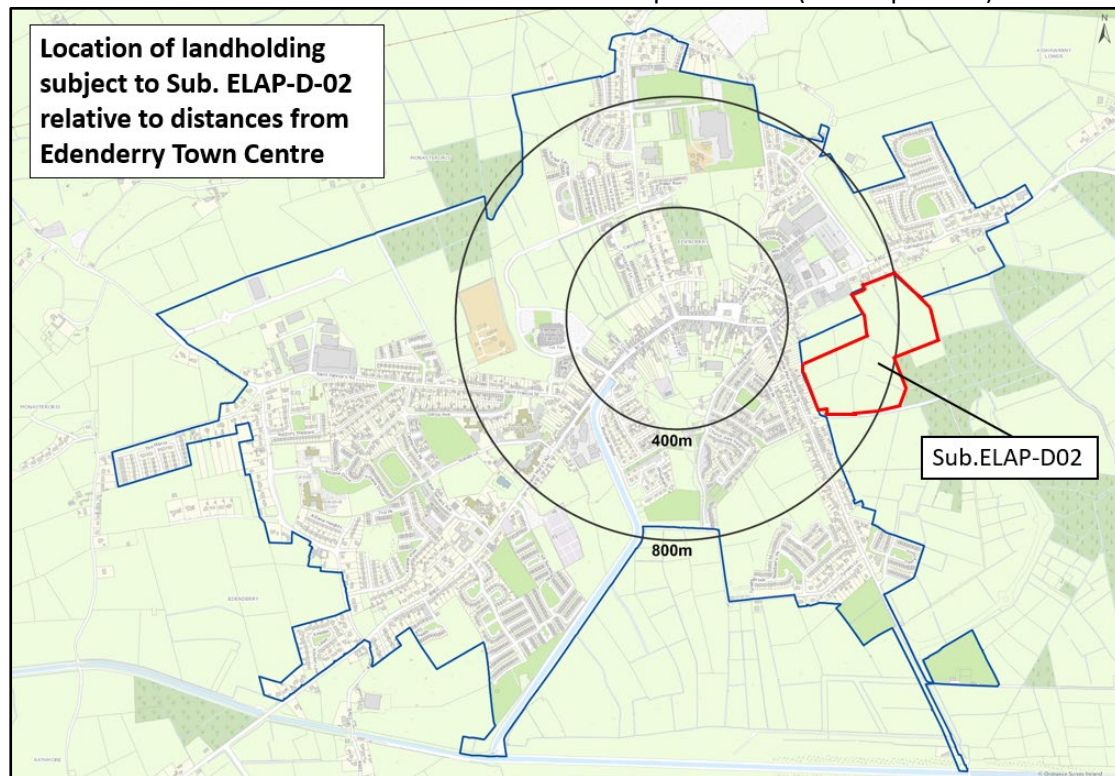
**CE Response:**

Zoning Request

I recommend no amendment to the zoning map for the Edenderry LAP for the following reasons:

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development

*perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. Regional Strategic Outcome 2 (RSO 2) of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'* It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan (see map below).



2. The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 13.14 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

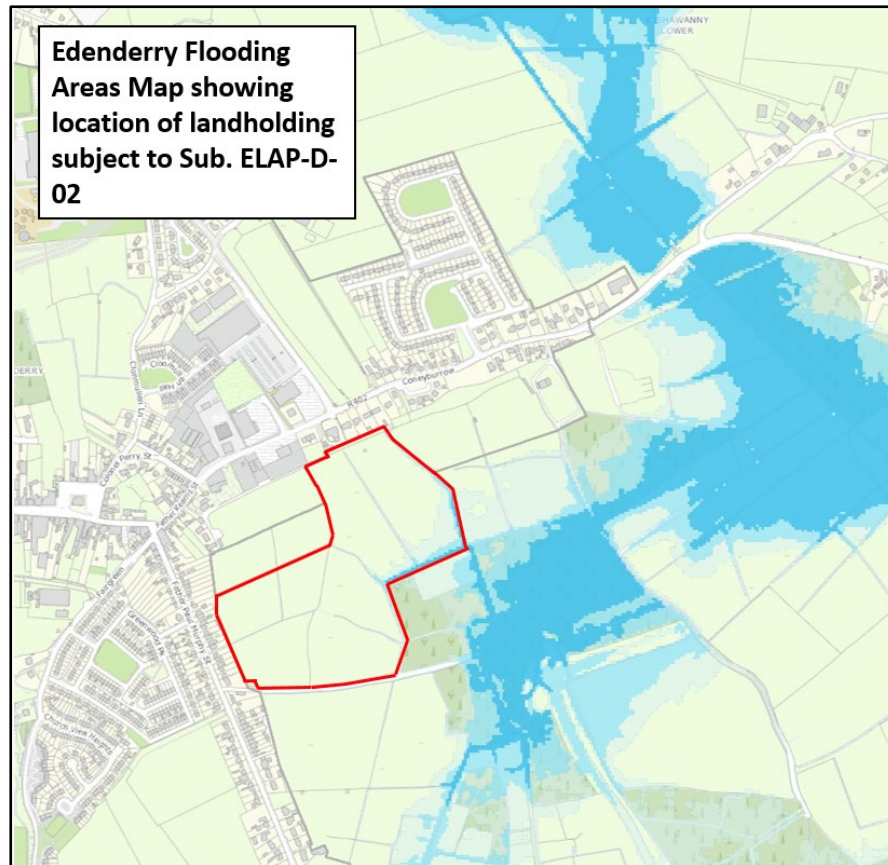
**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

3. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'
4. Whilst this site is located on the edge of the town centre, it is also noted that the north east site boundary is designated Constrained Land Use in the Draft Plan as it is prone to flooding.



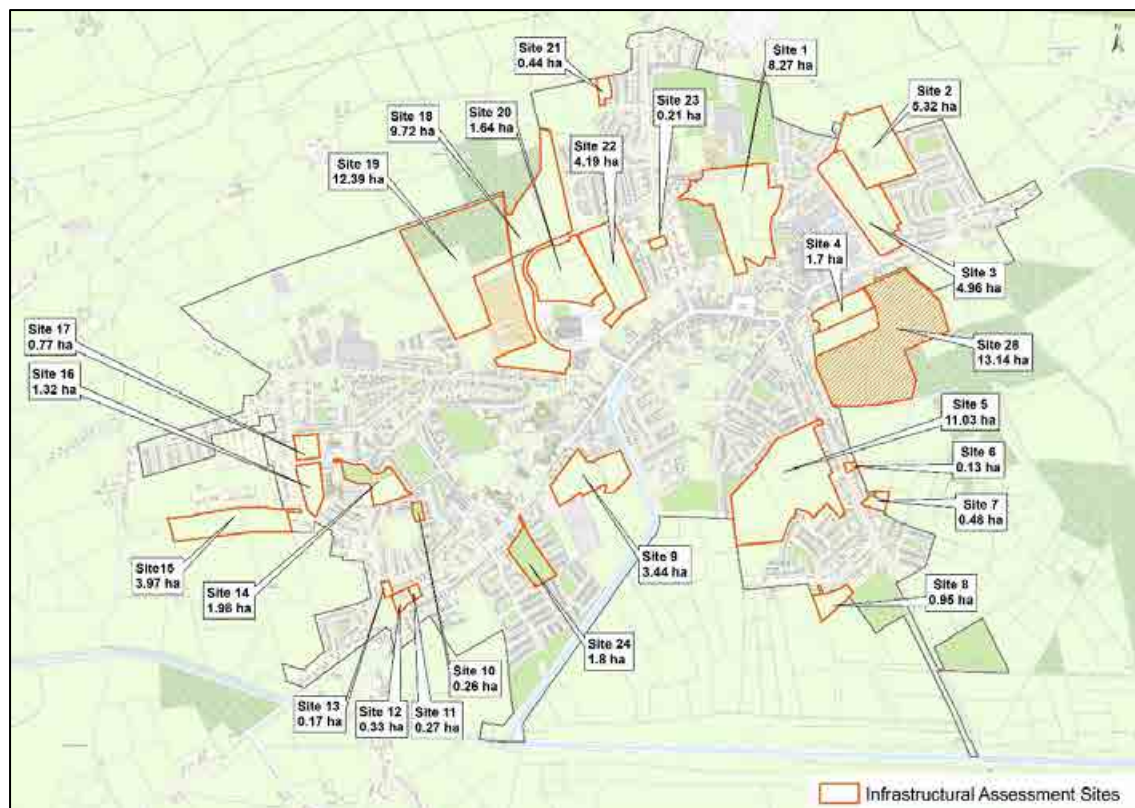
5. There are limited access points to the landholding from the Dublin Road and Fr Murphy St.

#### Planning and Infrastructural Assessment

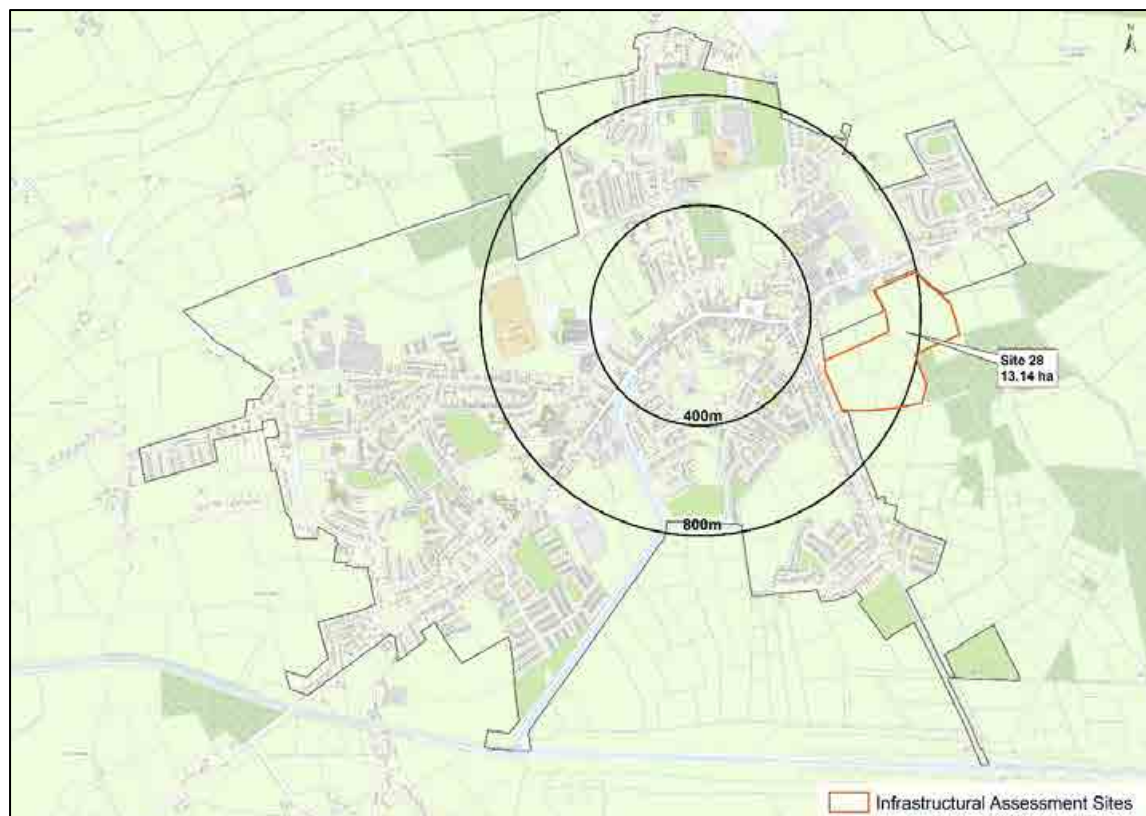
I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site (labelled 28 shown in hatched shading in map below). It is necessary to amend the following tables/figures to make reference to the subject site;

- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre
- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 28' in proposed revised mapping in the Planning and Infrastructural Assessment.



**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment**



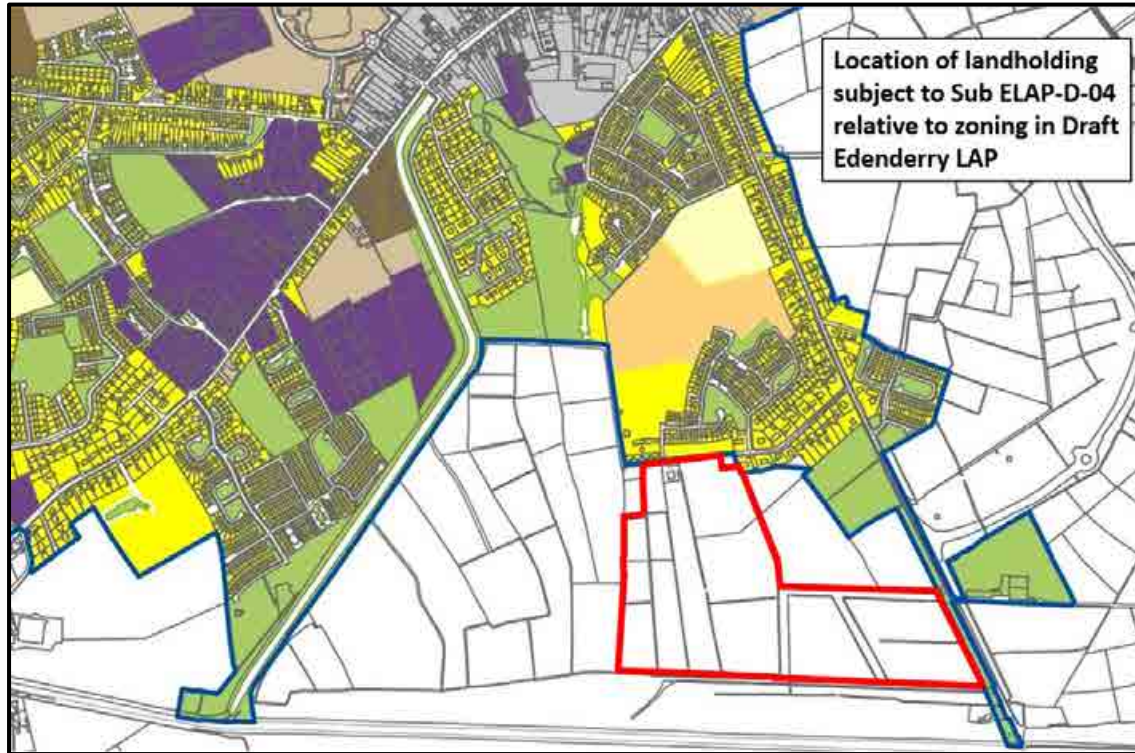
**Figure 10.2 Distance of sites from Edenderry Town Centre**

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
28	Dublin Road and Fr. Paul Murphy St	13.14 ha.	Large Greenfield landholding comprising a number of fields located to the east of the town between the Dublin Road and Father Murphy Street. The site is bordered by predominantly commercial properties to the north and residential properties to the west. A number of drains run along field boundaries on the subject lands. The gradients of the landholding are higher to the west falling in a north easterly direction.

**Table 10.2: Site Appraisals**

Site No.	Criteria	Recommendation	Justification
28	Promotes compact growth	Do not zone.	<p>This site is located on the edge of the town centre. The north east site boundary is designated Constrained Land Use as it is prone to flooding. There are limited access points to the landholding from the Dublin Road and Fr Murphy St with only a narrow laneway coming onto Fr Murphy St offering independent access to the landholding currently. While there exists a bus stop on the Dublin Road and most of the site lies within 800 metres walking distance of the town centre, there exists no cycleways along the public roads in the vicinity of the site.</p> <p>There are other lands more suitable for residential development identified in the Plan Area.</p>
	Promotes sustainable mobility		
	Availability of infrastructure & services		
	Physical suitability and accessibility		

**Ref: ELAP-D-04****Person / Body:** Frank Murray on behalf of Edenderry Livestock Mart**Summary of submissions / observations:**

This submission proposes that this site of 19.6 hectares be zoned for residential purposes as;

- a) The lands are close to other zoned areas and are very suitable for housing being in close proximity to the town and existing amenities;
- b) Edenderry, like most towns, has a severe shortage of housing. These lands would be cost effective for housing and ready to develop for social and affordable housing;
- c) The land abuts the Grand Canal, the Greenway, soccer pitch, the skate-park and Blundell Park. People living in this area would not be car dependent to avail of these existing amenities for recreational purposes;
- d) The proposed relief road or ecological corridor as referred to in the new draft plan, which may pass through the lands should not affect the development of the land when the preferred route option is eventually chosen;
- e) The land can be assessed directly from Fr. Paul Murphy Street so the development of the lands can be carried out without any disruption to existing housing in the area;
- f) On completion of the development, it can be accessed through Tyrells Lane which would be very beneficial for children walking to school; and
- g) The site is serviceable.

**CE Response:****Zoning Request:**

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reasons;

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'* It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.
2. The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 21.94 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlinton Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

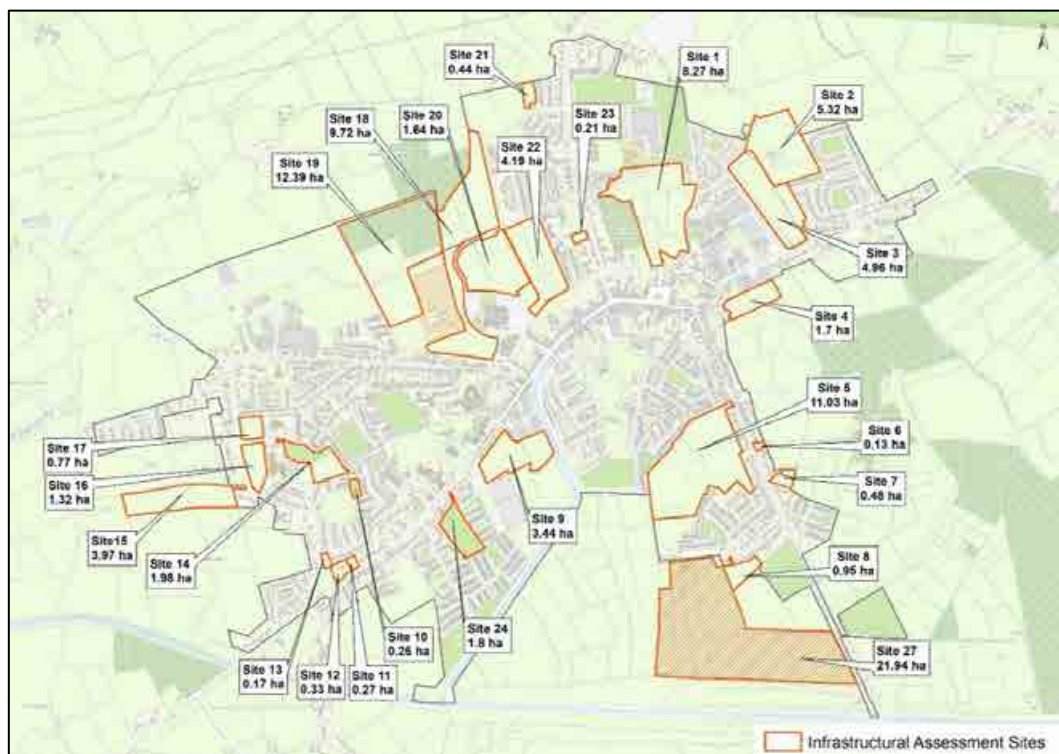
3. In addition Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

#### Planning and Infrastructural Assessment:

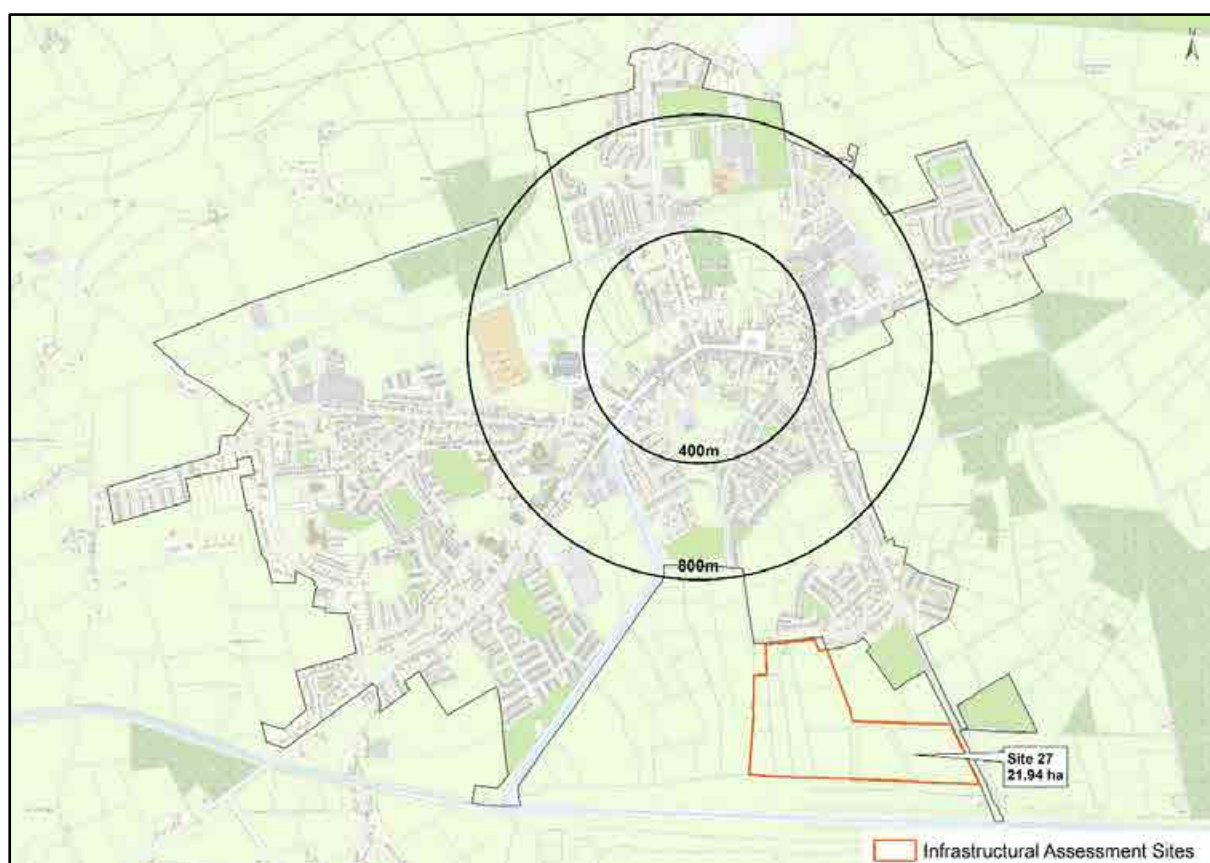
I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre
- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 27' in proposed revised mapping in the Planning and Infrastructural Assessment.



**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment**



**Figure 10.2 Distance of sites from Edenderry Town Centre**

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
27	Downshire	21.94 ha.	Large Greenfield parcels of land located outside and to the south of the town stretching from close to the Grand Canal to Tyrells Lane. The site is bordered to the east by Local Primary Road, L-1001-2. The landholding is relatively flat.

**Table 10.2: Site Appraisals**

Site No.	Criteria	Recommendation	Justification
27	Promotes compact growth	Do not zone.	This site is peripheral to the town, located over 1200 metres from the town centre. In addition, it is noted that there exists no footpaths running along the road.
	Promotes sustainable mobility		

Site No.	Criteria	Recommendation	Justification
	Availability of infrastructure & services		There are other lands more suitable for residential development identified in the Plan Area.
	Physical suitability and accessibility		

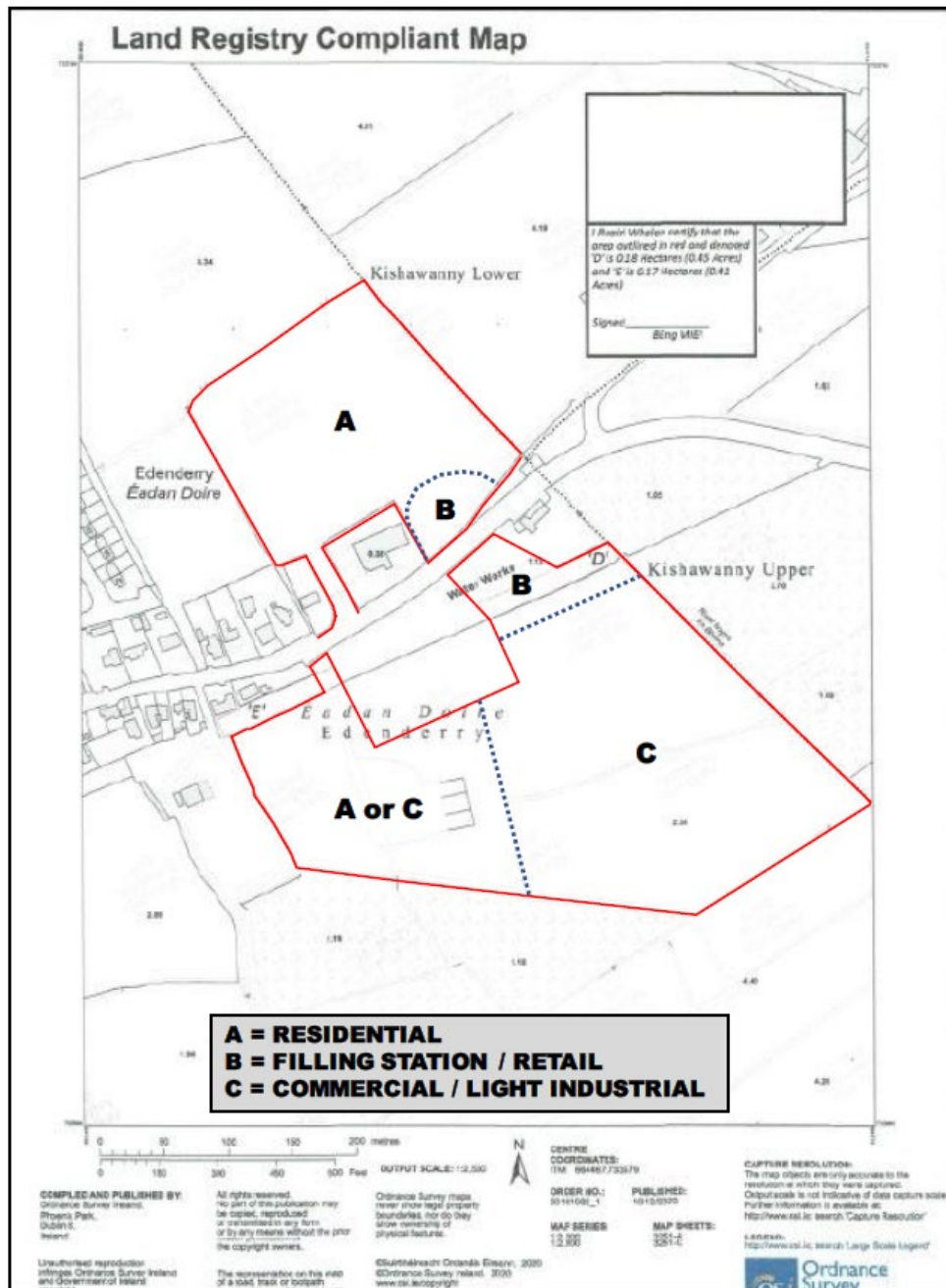
**Ref: ELAP-D-05**

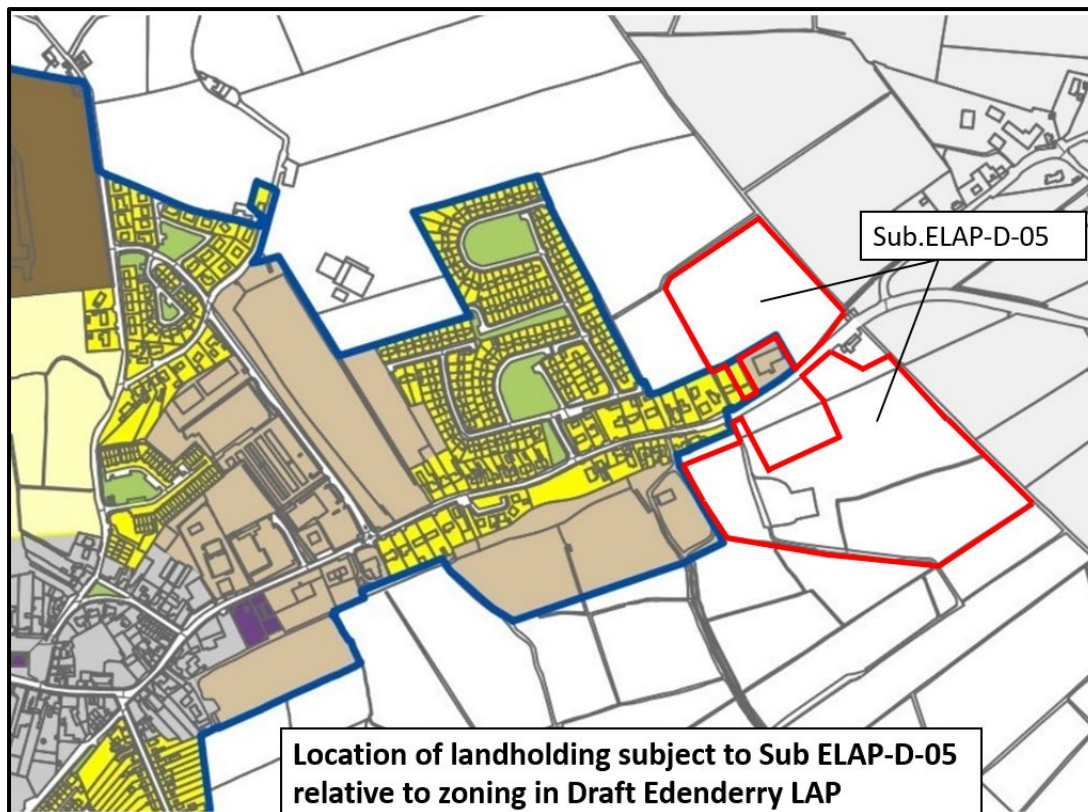
**Person / Body: Sunny Day Properties**

**Summary of submissions / observations:**

This submission requests that the subject site be re-zoned for commercial and housing development (as shown below) for the following reasons;

- Housing shortage and the negative impact that lack of accommodation is currently having on the Irish Society;
- The indicative location for the Ring Road and its interchange with the R402 created huge potential for the development of retail and commercial enterprise to the area of land east and west of the ring road;
- The need for land for industrial and commercial development in the town.





The submission also states the following in support of its zoning request;

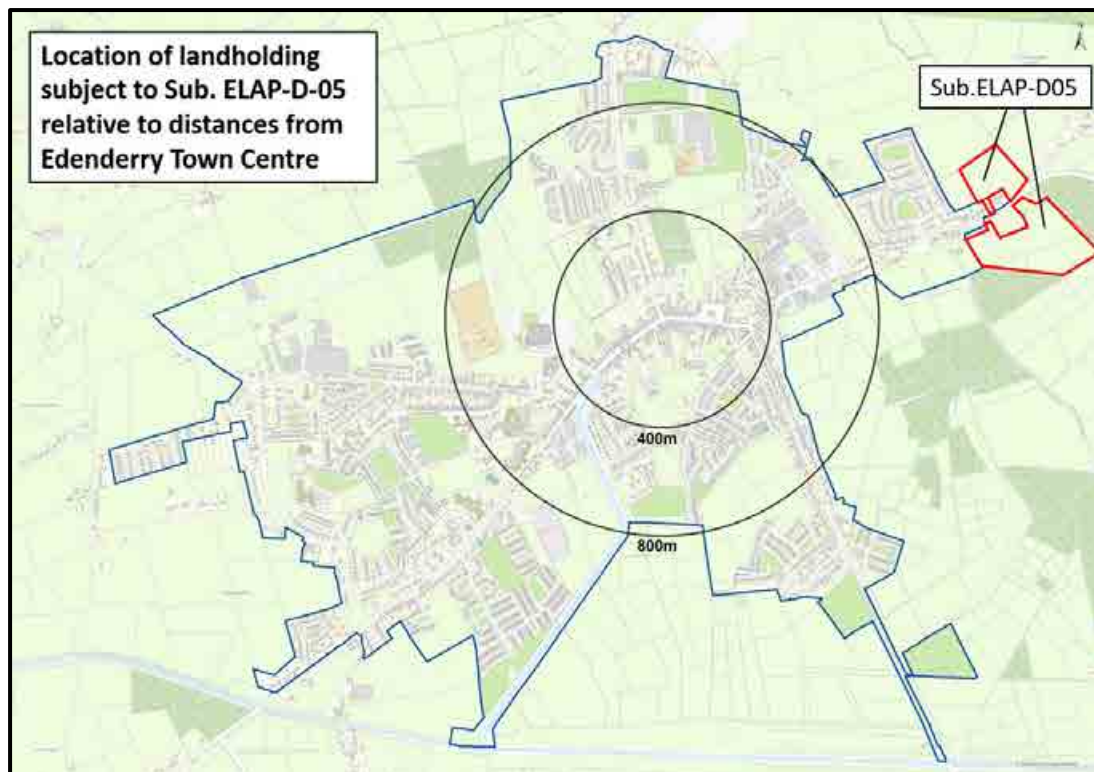
- Edenderry is a vibrant and expanding town and needs additional land to be rezoned for sustainable development;
- The fact that these lands represent the last bank of available agricultural land within the Offaly border on the north east side of Edenderry are fundamental in the acceptance that these lands are strategically important for the consolidated and coherent growth of the town of Edenderry and should be zoned accordingly;
- The lands in question are strategically located on both sides of the R402, this being the current main access route to/from Dublin;
- The location of these lands is significant in the context of proximity to main services such as sewerage, water, ESB;
- The lands in question on both sides of the road are well proportioned, i.e. width and depth. This improves options for efficient development and expansion whilst at the same time retaining areas of land for public amenity and flood risk management; and
- The planned ring road for the town of Edenderry has limited options for interconnection with the original R402 on the Northeast side, it is possible that the subject lands are the only available option for this interconnection to take place.

The submission acknowledges that the subject lands have flooded in the past and are likely to flood again, and states that flood risk identification, measuring, mitigation and management are fundamental to the successful forward planning and development of the subject lands.

**CE Response:**Zoning Request:

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reasons;

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'* It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.



The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land

new residential. This submission proposes to unacceptably exceed the allocation by 5.53 ha. (i.e. the sites designated as 'A' in the submission). This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

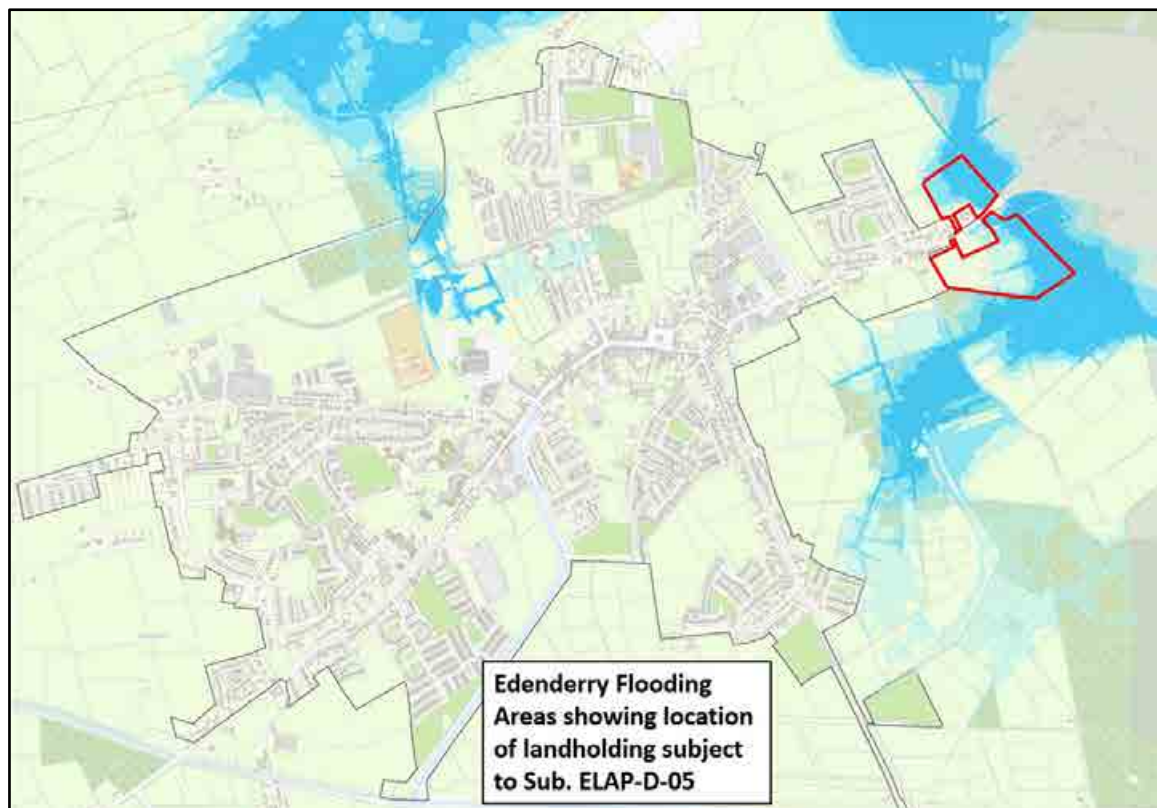
**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

2. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'
3. Most of the subject lands are designated Constrained Land Use in the Draft Plan as it is prone to flooding. Notwithstanding the application of a detailed site specific flood risk assessment, residential development is considered a highly vulnerable land use on such lands and there exists other lands in the town without this constraint that are suitable for housing and enterprise and employment uses.

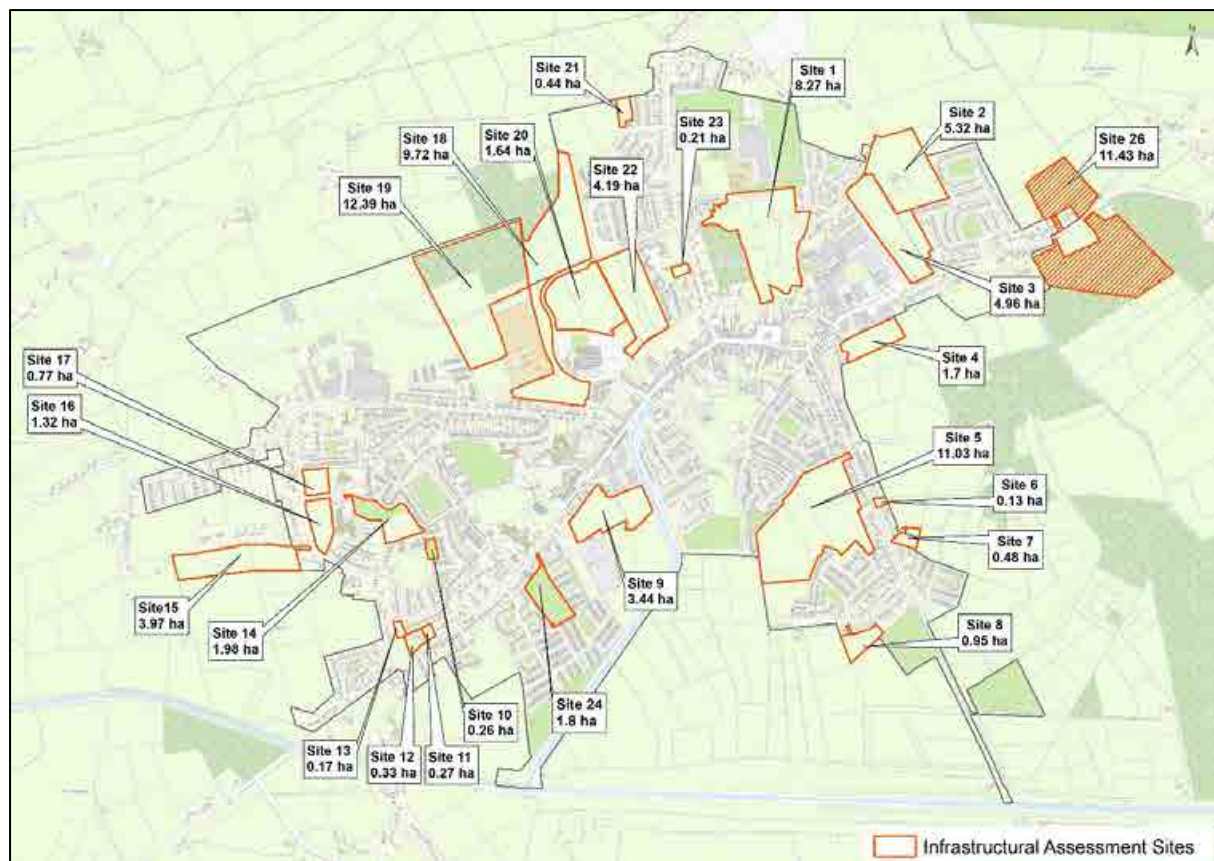


### Planning and Infrastructural Assessment

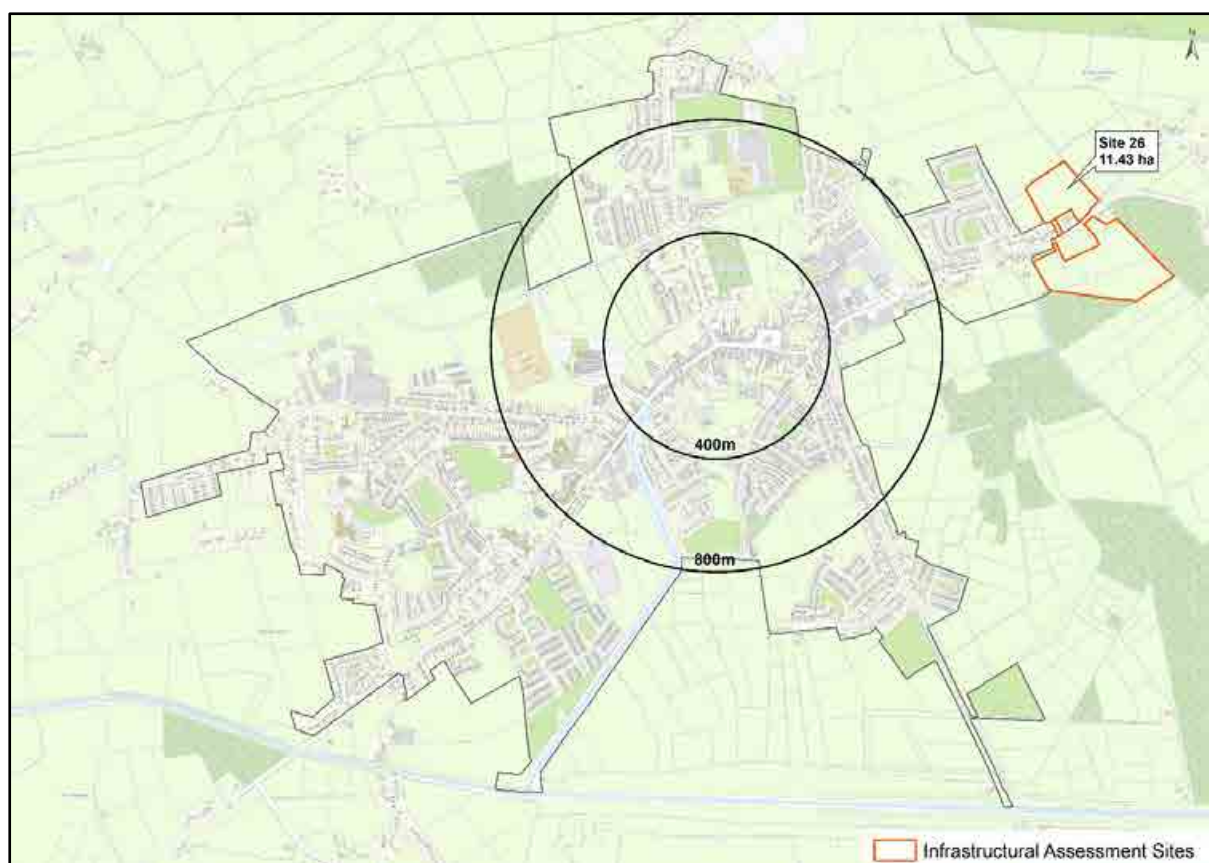
I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre
- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 26' in proposed revised mapping in the Planning and Infrastructural Assessment.



**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment**



**Figure 10.2 Distance of sites from Edenderry Town Centre**

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
26	Kishawannay Lower and Kishawannay Upper	11.43 ha.	Large Greenfield site located to the east of the town adjacent to the county border with Co. Kildare. The site is traversed by Regional Road, R402 and sits adjacent to the River Boyne to the east. The site is relatively flat.

**Table 10.2: Site Appraisals**

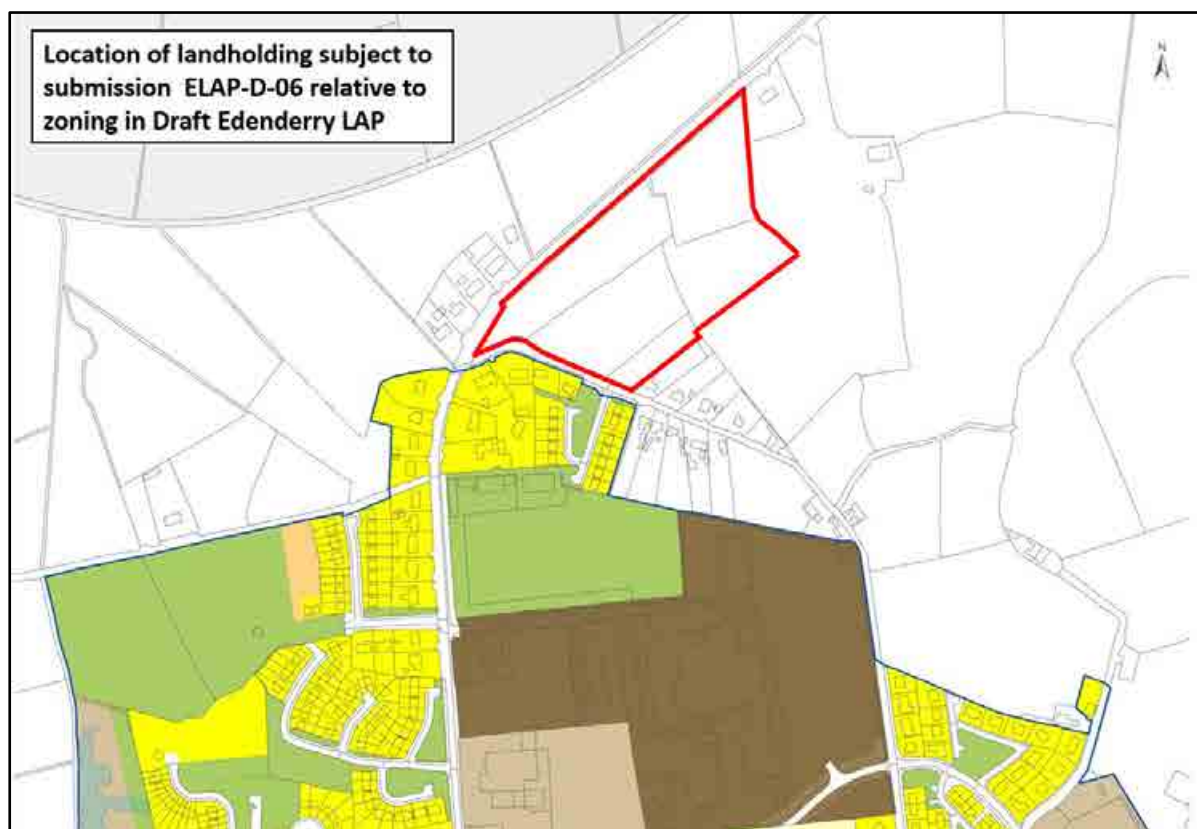
Site No.	Criteria	Recommendation	Justification
26	Promotes compact growth	Do not zone.	This site is peripheral to the town, located over 1200 metres from the town centre, notwithstanding the location of a bus stop in the area on the R402. In addition, most of the site is located on lands prone to flooding designated Constrained Land Use in the Draft Plan.
	Promotes sustainable mobility		
	Availability of infrastructure & services		

Site No.	Criteria	Recommendation	Justification
	Physical suitability and accessibility		There are other lands more suitable for residential development identified in the Plan Area.

**Ref: ELAP-D-06****Person / Body:** John Mangan**Summary of submissions / observations:**

This submission requests that the subject lands be zoned for the purposes of private and social housing units as;

- There is an existing housing estate located only 450 metres from said land;
- The land is located only a two minute walk from the swimming pool and Edenderry GAA grounds;
- The land is approximately a seven minute walk from the proposed new site for Oaklands Community College and the Town Centre;
- There is approximately 410 metres of road frontage on the Carrick Road side of the land, and 180 metres on the Clonmullen Lane side;
- The land is situated within the current town boundary.



**CE Response:****Zoning Request:**

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reasons;

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'* It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 4.64 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

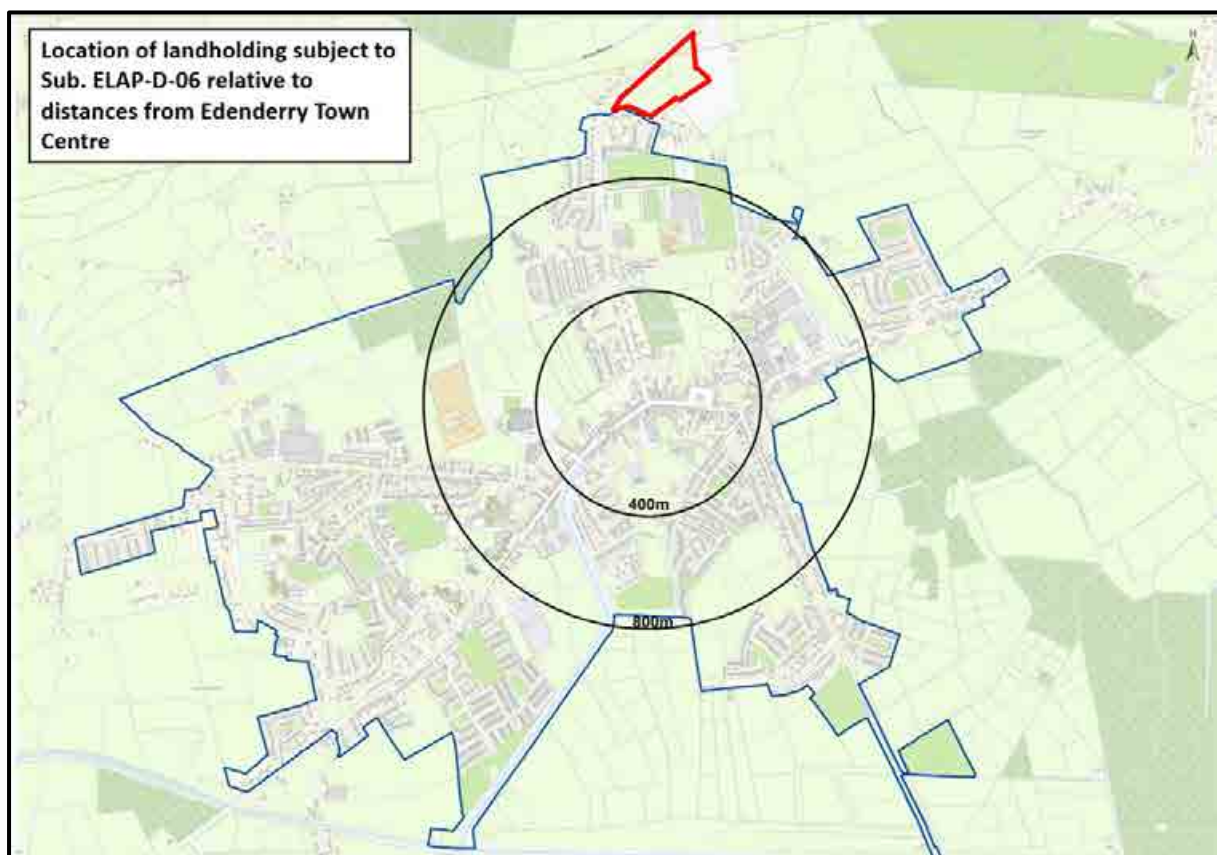
**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlinton Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.



2. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

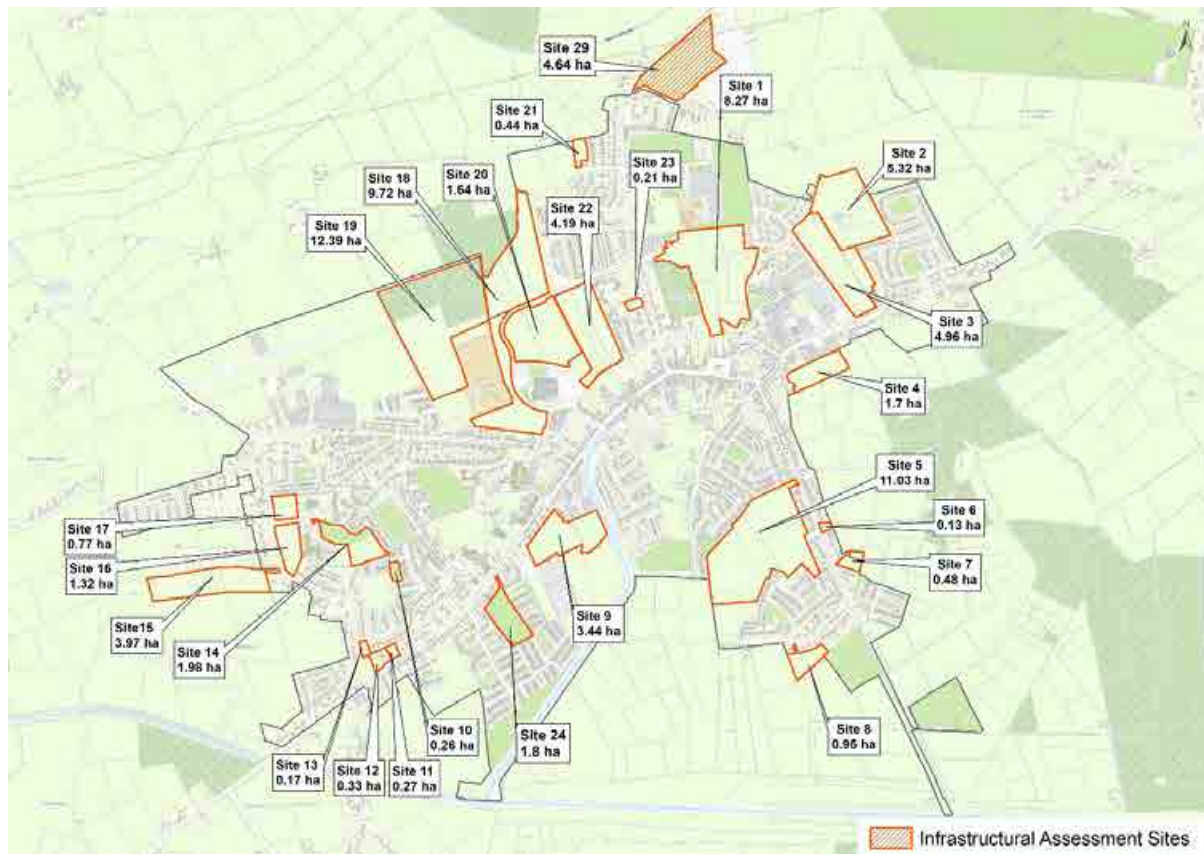
#### Planning and Infrastructural Assessment

I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

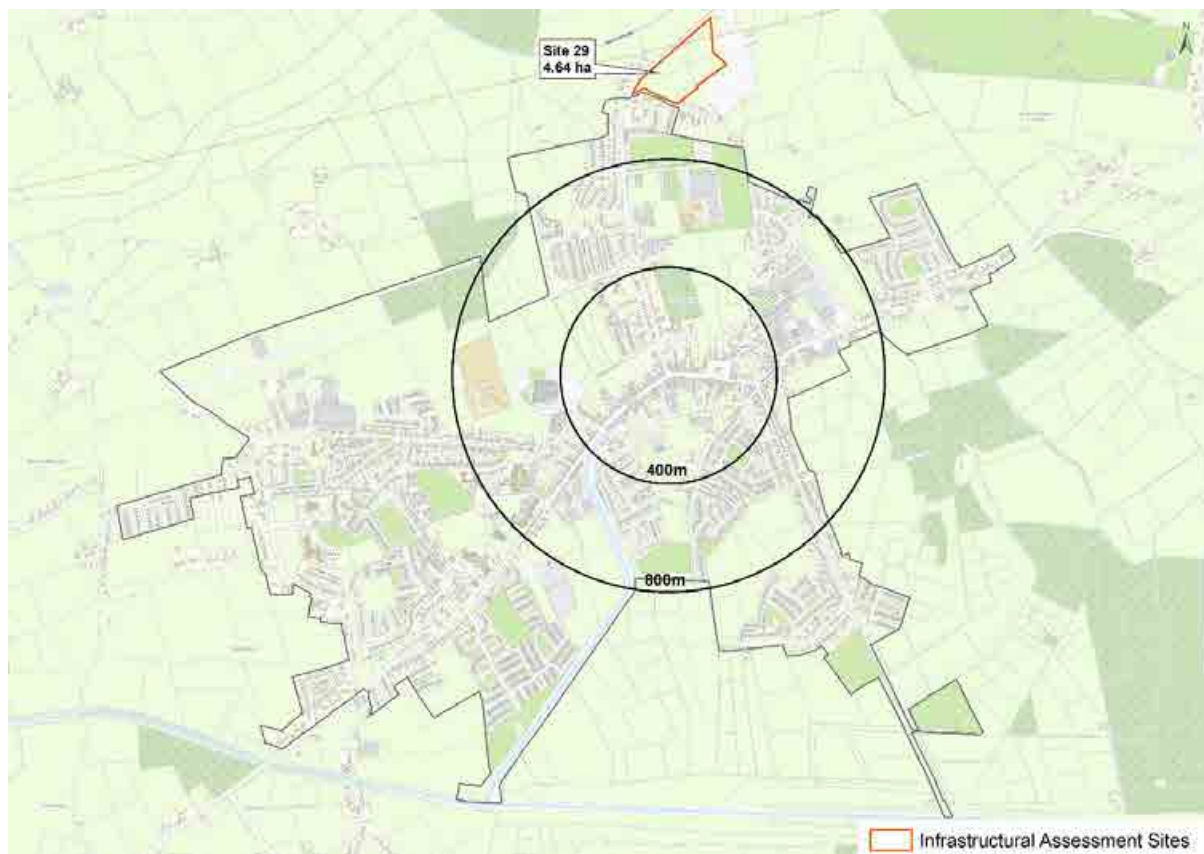
- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre

- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 29' in proposed revised mapping in the Planning and Infrastructural Assessment.



**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment**



**Figure 10.2 Distance of sites from Edenderry Town Centre**

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
29	Clonmullen	4.6 ha.	Rectangular shaped parcel of greenfield land located outside and to the north of the town. The site is bordered to the west and north west by the R401 and to the south by Local Road L-5053-1. The landholding is relatively flat.

**Table 10.2: Site Appraisals**

Site No.	Criteria	Recommendation	Justification
29	Promotes compact growth	Do not zone.	This site is peripheral to the town, located over 1000 metres from the town centre. In addition, it is noted that there exists no footpaths or cycleways running along the road. Zoning this site for residential development would constitute urban sprawl, increase car
	Promotes sustainable mobility		
	Availability of infrastructure & services		

Site No.	Criteria	Recommendation	Justification
	Physical suitability and accessibility		dependency and mitigate against the promotion of compact growth.  There are other lands more suitable for residential development identified in the Plan Area.

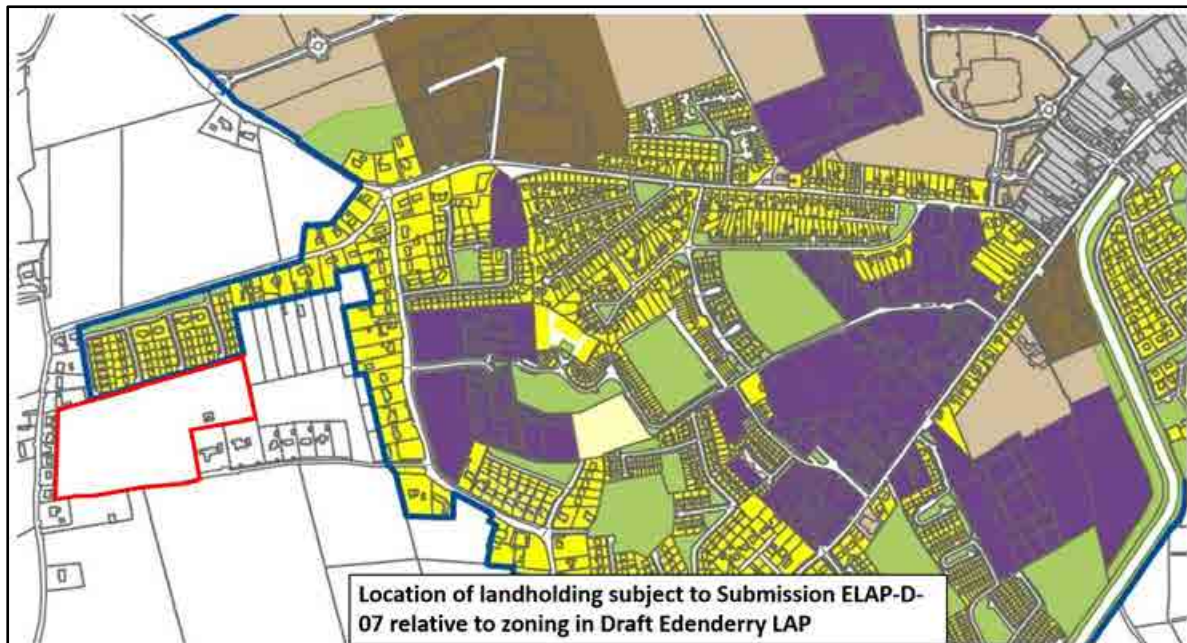
**Ref: ELAP-D-07****Person / Body: Brendan Foran****Summary of submissions / observations:**

This submission requests that the subject lands be zoned Residential as;

- The service road is surfaced, kerbed and services six existing dwellings to the east;
- The land is of a very high quality and very suitable for housing. There would be no piling needed with this landholding and building on this land would be less expensive in comparison to a number of other plots zoned around the town.
- The lands are well located being in very close proximity to two new national schools and within walking distance to Edenderry shopping centre and bus stops while supermarkets can be accessed by the newly constructed Inner Relief Road. A table outlining comparable distance between the subject lands and Tyrells lane, Boyne Meadows and Derrycoris housing developments (by road) to schools, St Marys Church/cemetery, Edenderry Shopping Centre and Edenderry Post Office is contained within this submission.

The submission proposes in relation to the issue of sewerage to;

- Gravity feed the sewerage through The Manor to the existing pumping station on Cokery Lane and if the capacity is insufficient, the developer could upgrade this station;
- Install a pumping station on the lands and pump the sewerage back up the existing roadway to the point where gravity will then feed it to the main sewer on the Back Road.



### CE Response:

#### Zoning Requests:

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reasons;

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.*' It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 5.28 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlinton Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

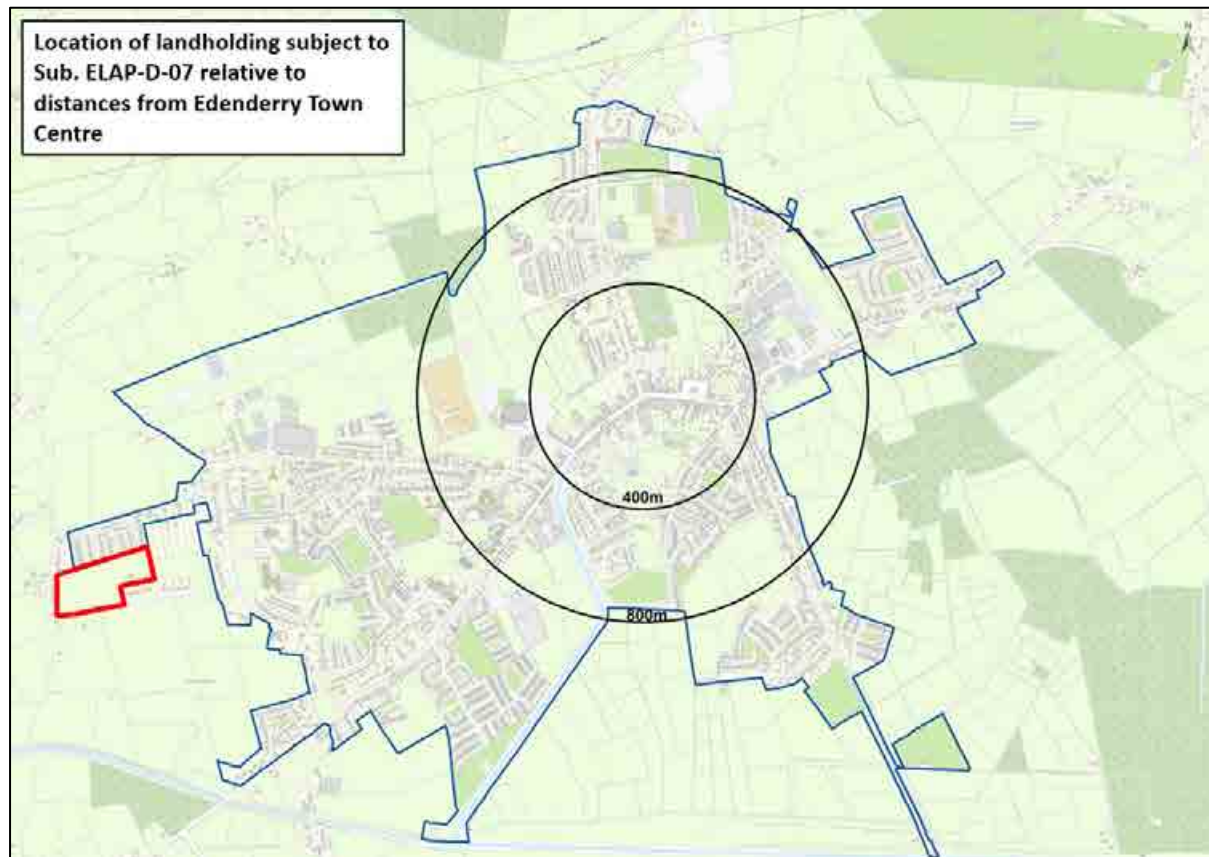
2. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

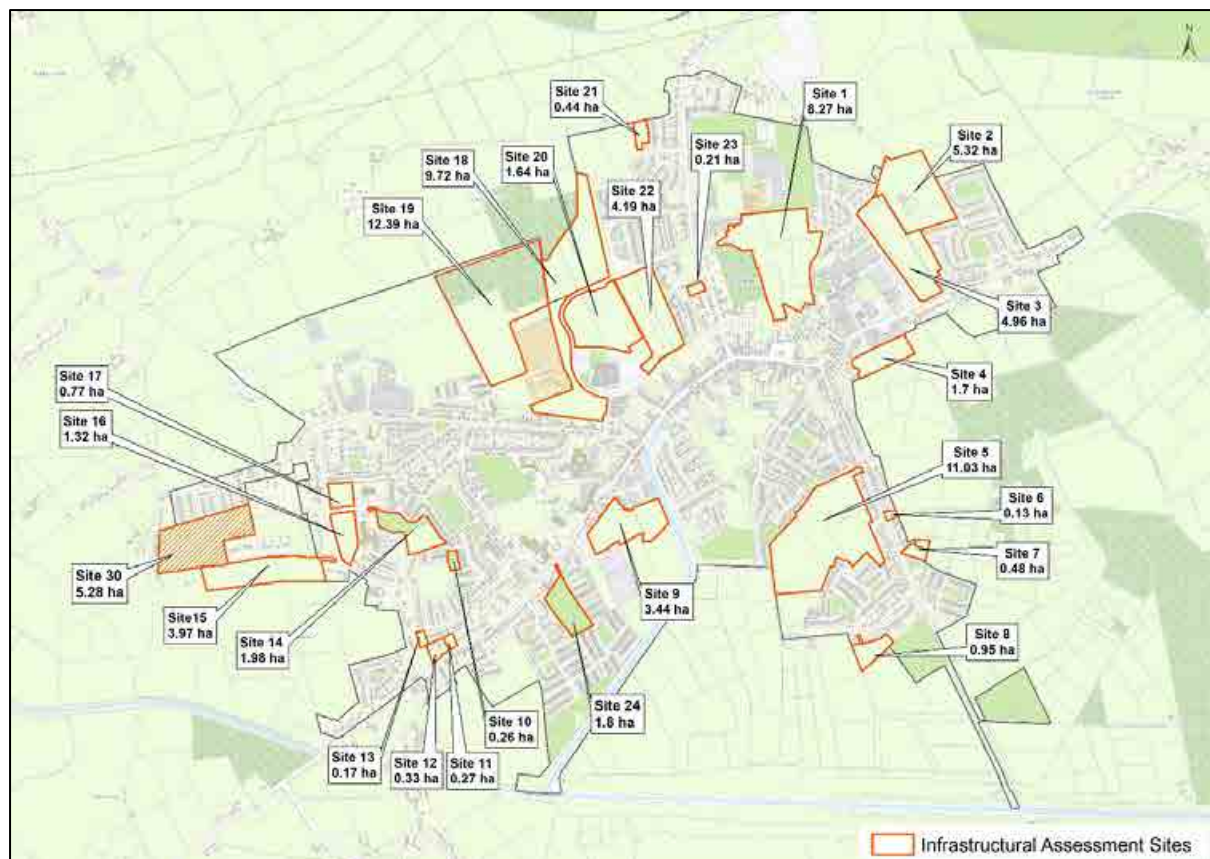
#### Planning and Infrastructural Assessment:

I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

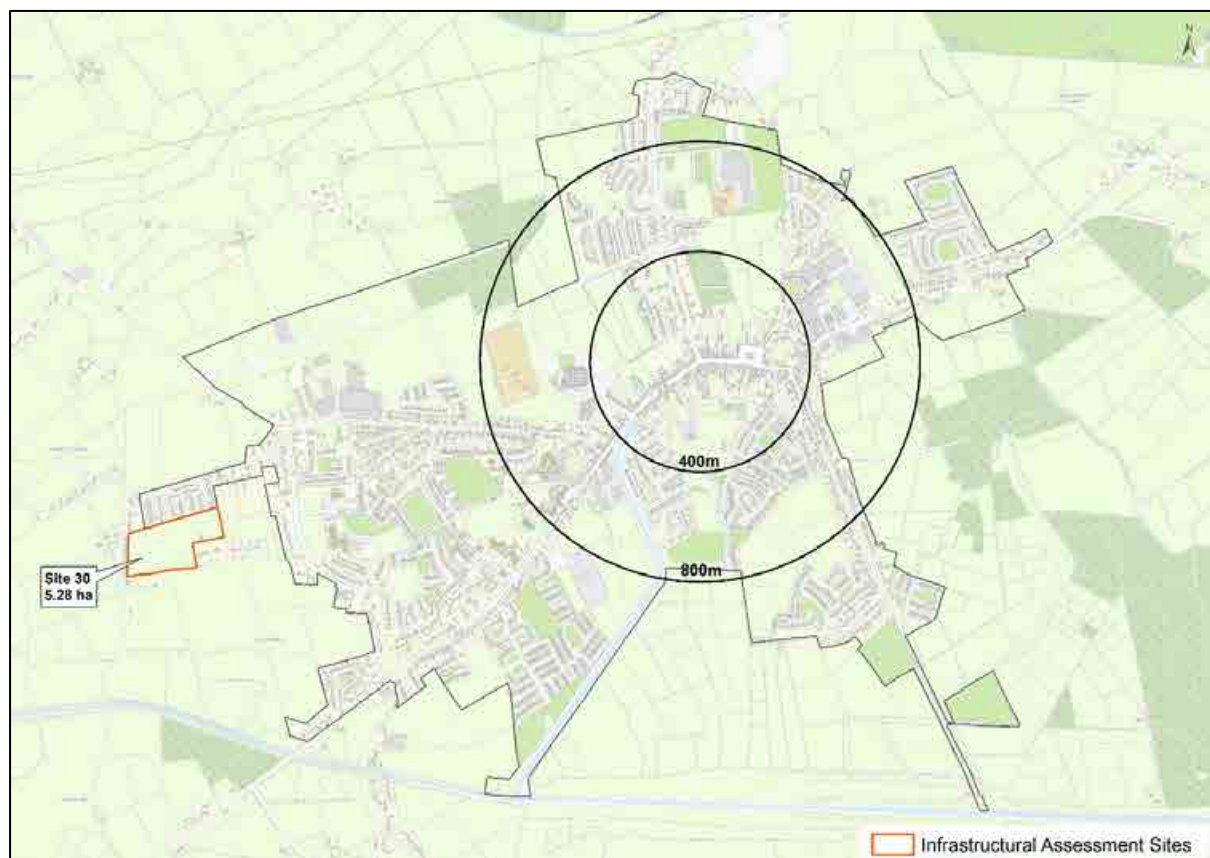
- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre
- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 30' in proposed revised mapping in the Planning and Infrastructural Assessment.





**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment**



**Figure 10.2 Distance of sites from Edenderry Town Centre**

Table 10.1 List of Sites Assessed

Site No.	Site Name	Site Area	Site Description
30	Monasteroris	5.28 ha.	Large Greenfield parcel of land comprising two fields in agricultural use located outside and to the west of the town. The site is bordered to the north by the Manor housing development, to the west by one off houses along Local Tertiary Road, L-10271-2. The landholding is accessed from a cul de sac laneway to the east which serves a number of individual houses. The landholding is relatively flat.

Table 10.2: Site Appraisals

Site No.	Criteria	Recommendation	Justification
30	Promotes compact growth	Do not zone.	This site is peripheral to the town, located over 1200 metres from the town centre. Notwithstanding the existence of schools in the area, zoning this site for residential development would constitute urban sprawl, increase car dependency and mitigate against the promotion of compact growth.
	Promotes sustainable mobility		
	Availability of infrastructure & services		
	Physical suitability and accessibility		There are other lands more suitable for residential development identified in the Plan Area.

**Ref: ELAP-D-08**

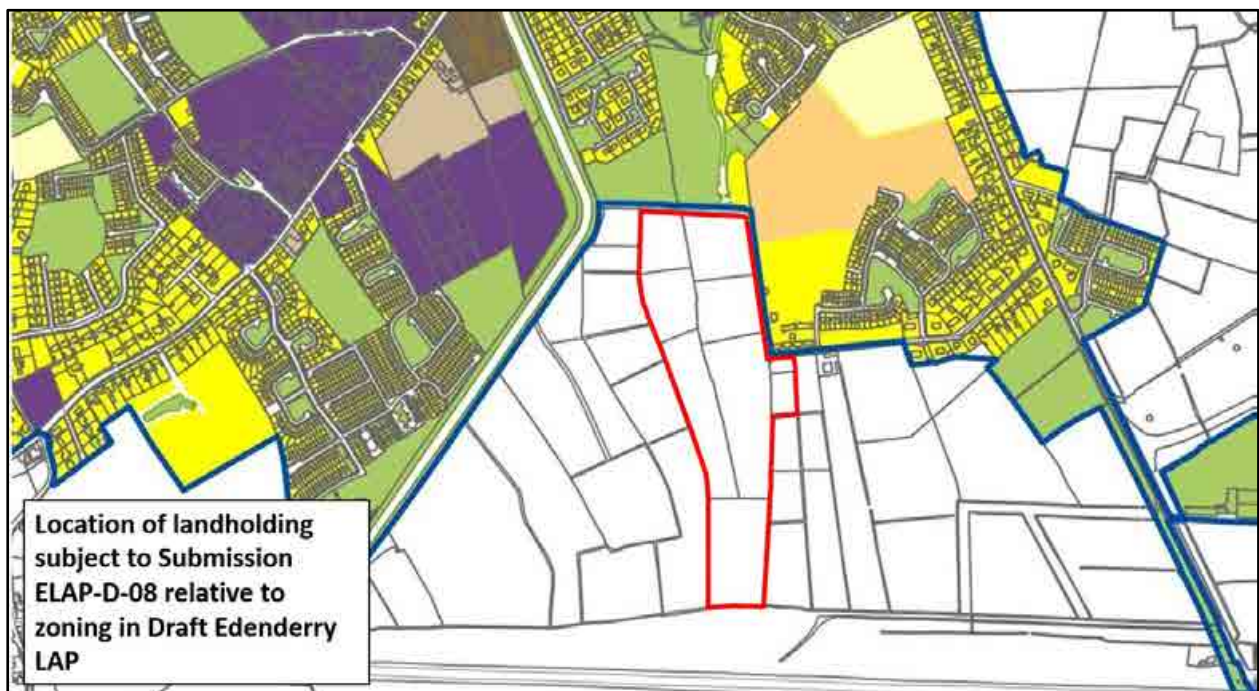
**Person / Body: Eamon Dunne and Patrick Gilson**

#### Summary of submissions / observations:

This submission requests that the subject landholding be zoned, either entirely or partially, for residential purposes as;

- The lands would lend itself to walking or cycling as opposed to driving, as its close to the Greenway, cycle path and soccer pitch, thus reducing car dependency;
- The lands can also be accessed from the north, along the canal line through Blundell Wood Estate which leaves the lands extremely close to the town centre;
- Part of the lands to the north would be a natural extension of the existing residential zoned land area in the town;

- d) The proposed relief road or ecological corridor as referred in the new draft plan, which may pass through the lands should not affect development of the land when the preferred option is eventually chosen.

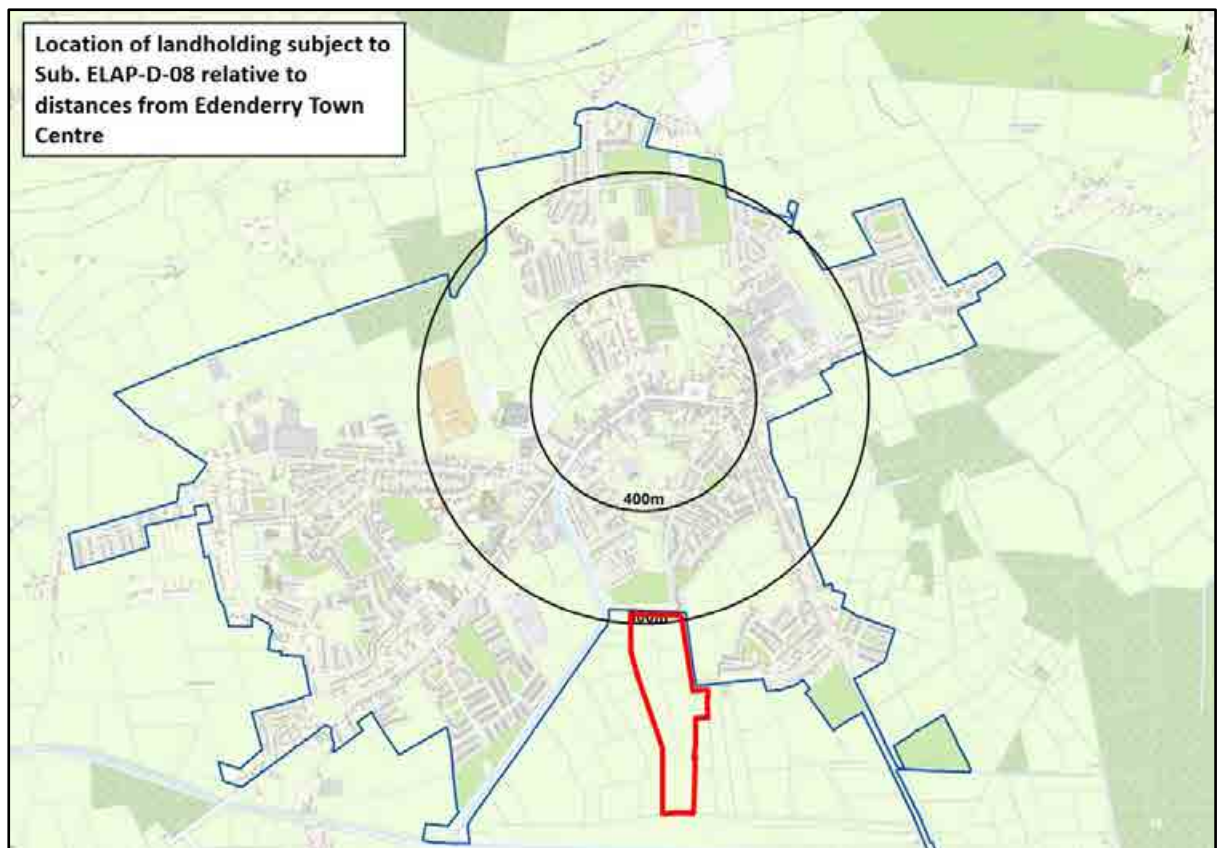


#### CE Response:

##### Zoning Request:

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reasons;

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.*' It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.



The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 11.35 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

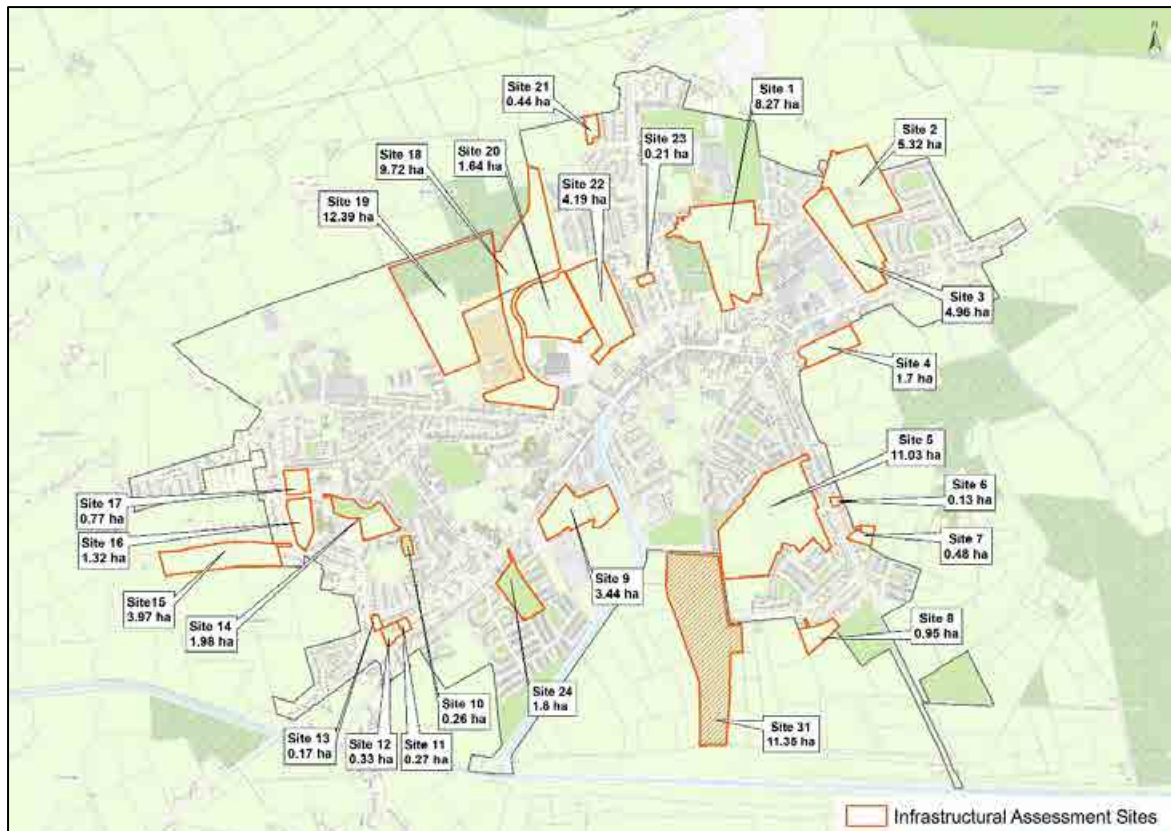
2. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

#### Planning and Infrastructural Assessment:

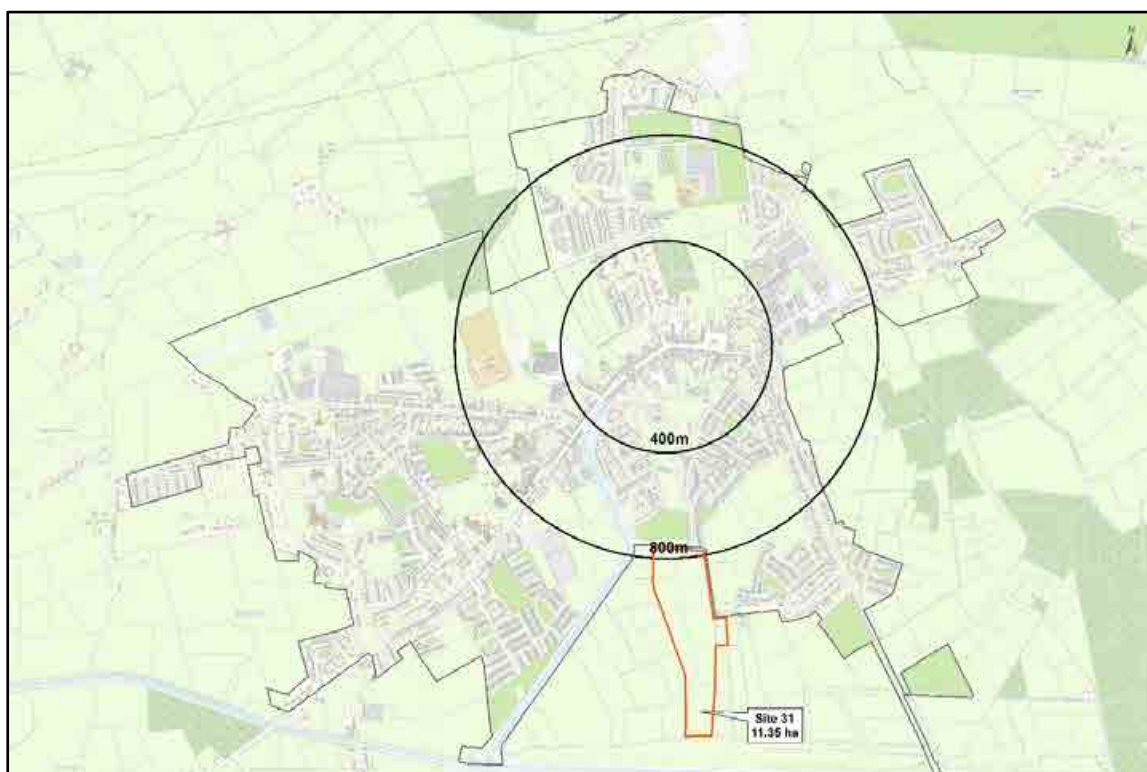
I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre
- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 31' in proposed revised mapping in the Planning and Infrastructural Assessment.



**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment**



**Figure 10.2 Distance of sites from Edenderry Town Centre**

Table 10.1 List of Sites Assessed

Site No.	Site Name	Site Area	Site Description
31	Tyrells Lane and Blundell Wood	11.35 ha.	Large Greenfield parcels of located outside and to the south of the town stretching from close to the Grand Canal to Tyrells Lane. The site is bordered to the east by Local Primary Road, L-1001-2. The landholding is relatively flat.

Table 10.2: Site Appraisals

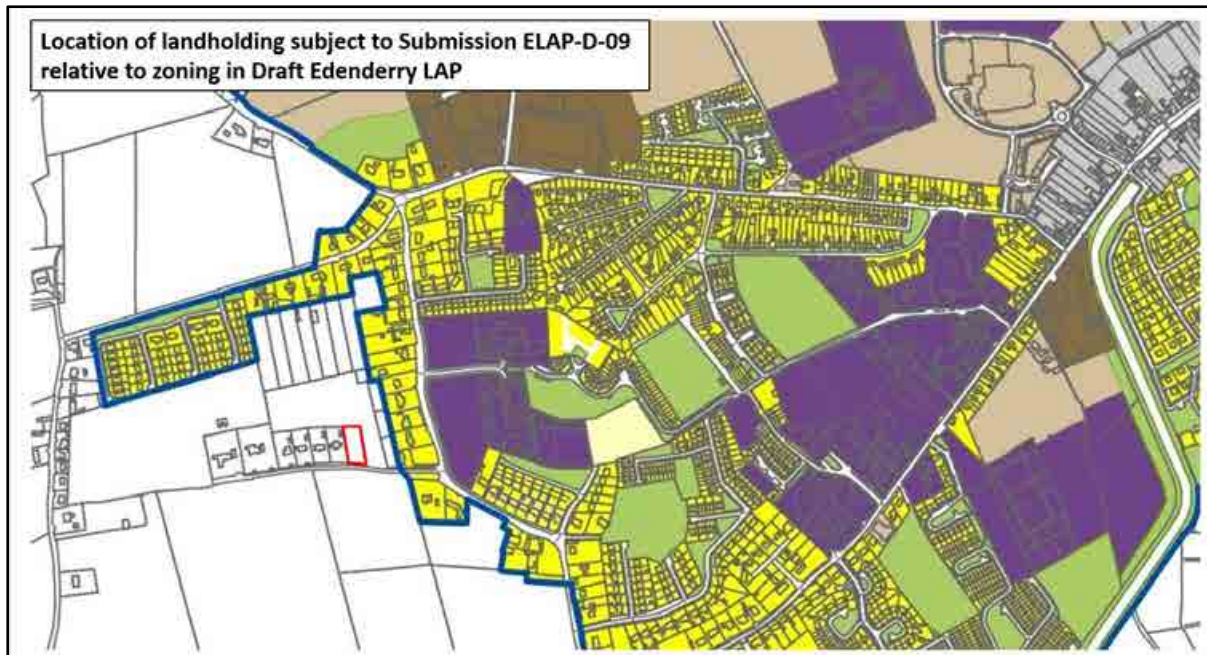
Site No.	Criteria	Recommendation	Justification
31	Promotes compact growth	Do not zone.	This site is peripheral to the town, located over 1200 metres from the town centre. Zoning this site for residential development would constitute urban sprawl, increase car dependency and mitigate against the promotion of compact growth. There are other lands more suitable for residential development identified in the Plan Area.
	Promotes sustainable mobility		
	Availability of infrastructure & services		
	Physical suitability and accessibility		

**Ref: ELAP-D-09**

**Person / Body: Paula Grehan**

#### Summary of submissions / observations:

This submission states that it is reasonable that this area be zoned residential as it is accessed from an existing cul-de-sac serving 6 other houses in a residential area. It is also stated that Paula Grehan received planning permission in 2025 which lapsed before applying again in 2020 which was refused permission under local need provisions.



### CE Response:

#### Zoning Request:

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reason;

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.*' It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 0.19 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

2. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

Accordingly, taking all of the above points into consideration, I do not recommend zoning the subject site in the manner sought.

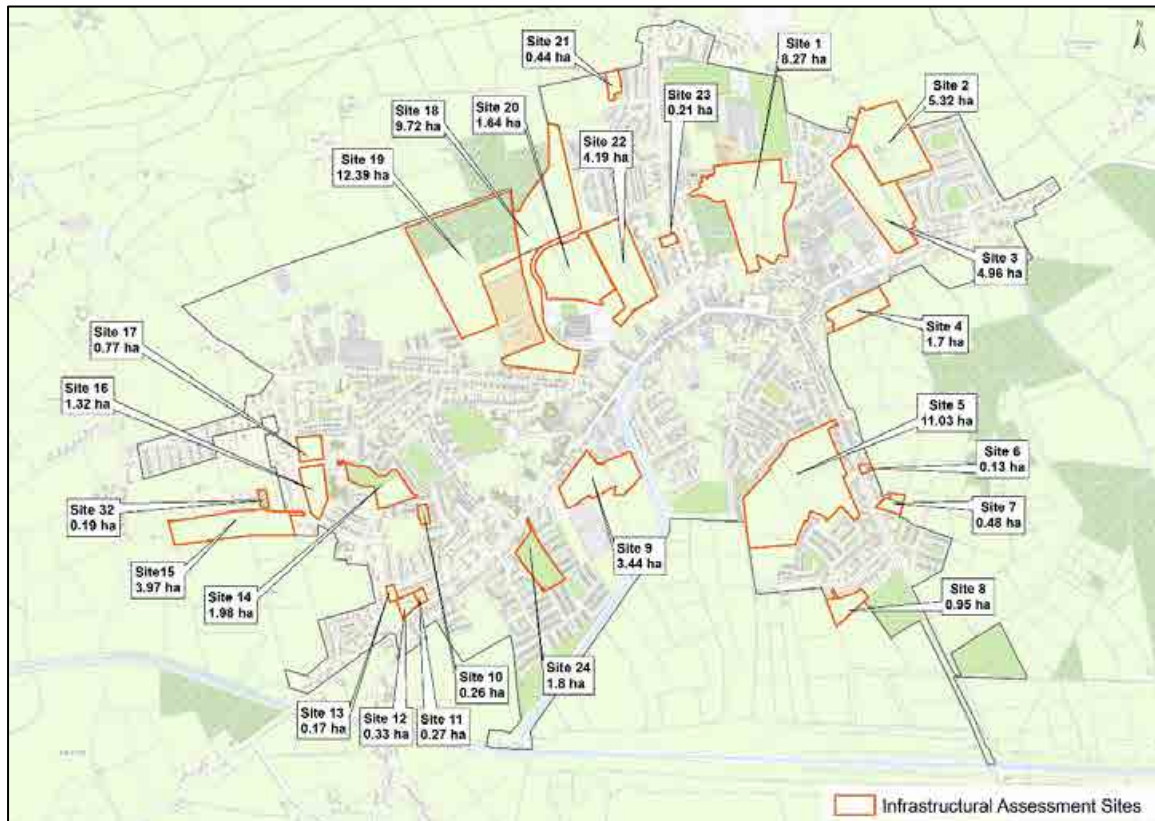
#### Planning and Infrastructural Assessment:

I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

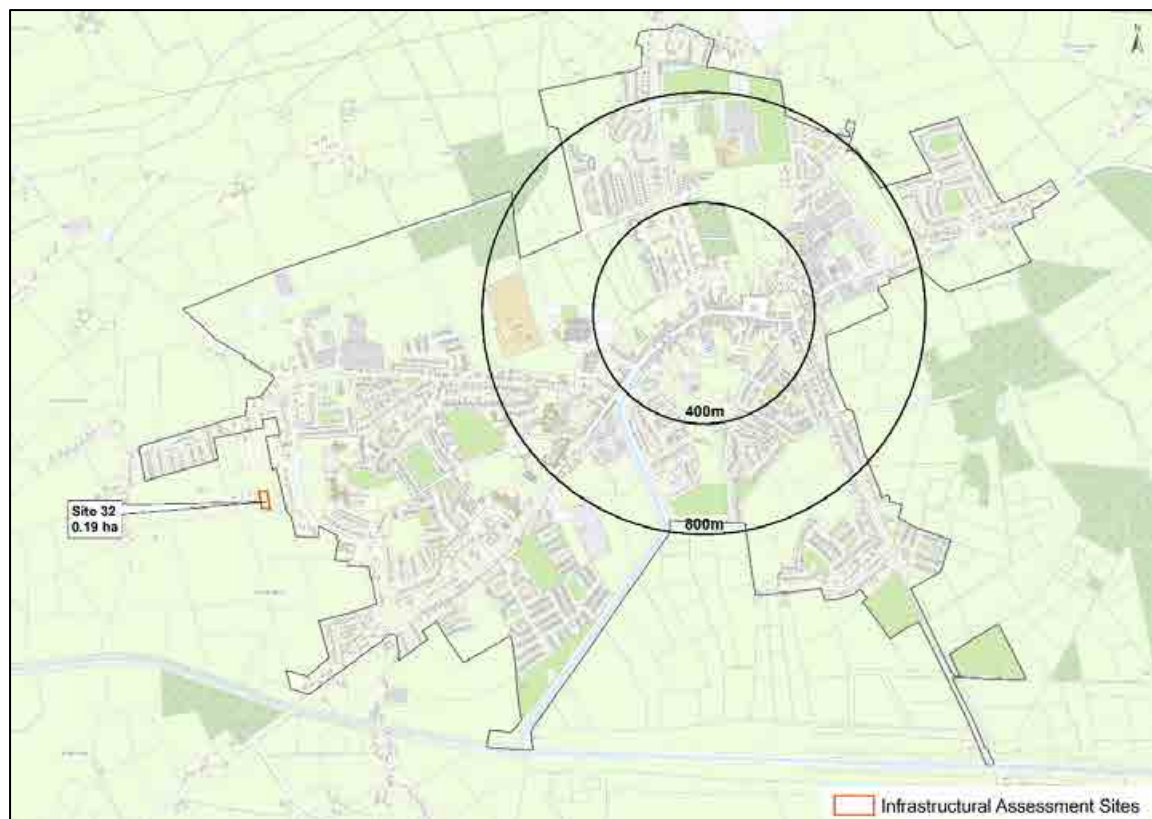
- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre

- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 32' in proposed revised mapping in the Planning and Infrastructural Assessment.



**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment**



**Figure 10.2 Distance of sites from Edenderry Town Centre**

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
32	Monasteroris	0.19 ha.	Small vacant site located outside and to the west of the town. The site is accessed from a cul de sac laneway to the east which serves a number of individual houses. The landholding is relatively flat.

**Table 10.2: Site Appraisals**

Site No.	Criteria	Recommendation	Justification
32	Promotes compact growth	Do not zone.	This site is peripheral to the town, located over 1200 metres from the town centre. Notwithstanding the existence of schools in the area, zoning this site for residential development would constitute urban sprawl, increase car dependency and mitigate against the promotion of compact growth. There are other lands more suitable
	Promotes sustainable mobility		
	Availability of infrastructure & services		

Site No.	Criteria	Recommendation	Justification
	Physical suitability and accessibility		for residential development identified in the Plan Area.

**Ref: ELAP-D-10****Person / Body:****Tom Glynn, Firacorn Ltd.****Summary of submissions / observations:**

The subject submission seeks to rezone a portion of their land from 'Community Services/Facilities' to 'Enterprise and Employment'.

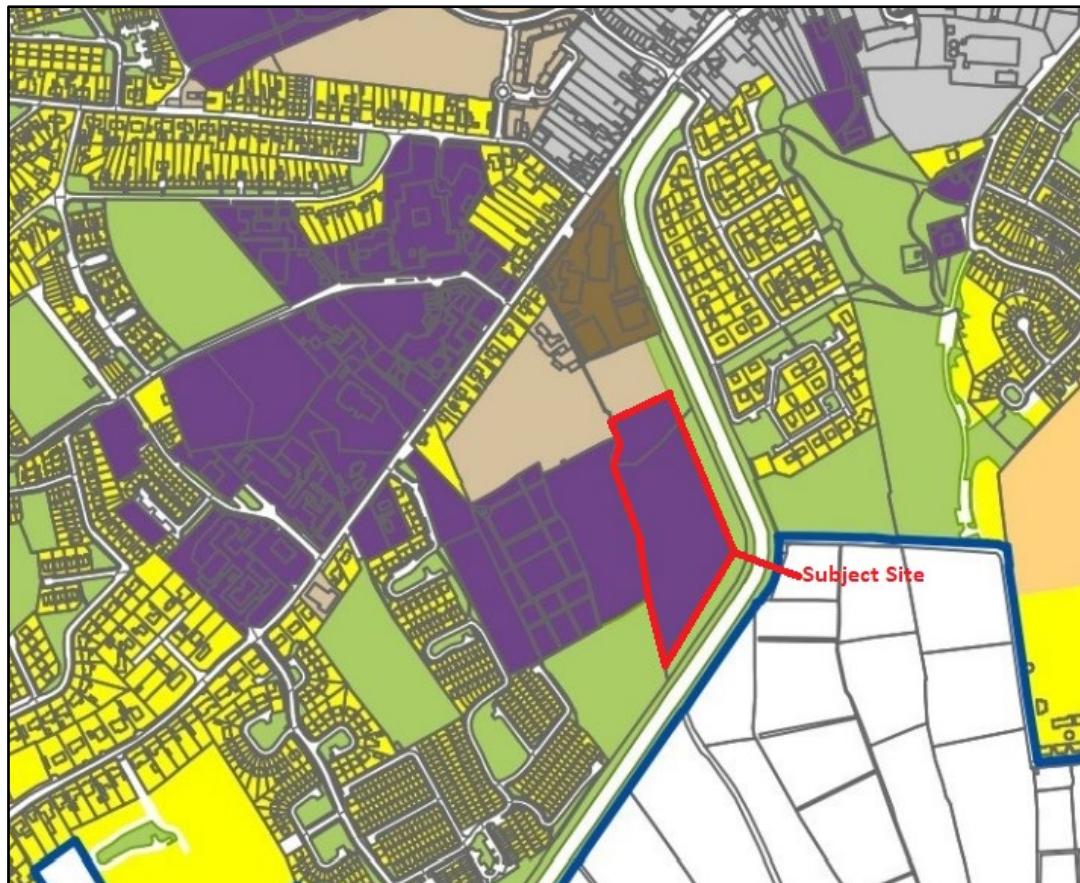
The submission also seeks to relocate the proposed pedestrian bridge over the Grand Canal to a location further south from where it is currently proposed.

**CE Response:**

The existing Edenderry Business Park is zoned 'Industrial and Warehousing' and contains a number of light industrial uses including confectionary manufacture, Tool Hire, Kitchen manufacture and a joinery business. There is currently an existing c.0.7 hectare area of land located to the south of the existing Edenderry Business Park that is vacant and zoned 'Enterprise and Employment'. There is also an existing portion of land to the west which is 2.4 hectares, zoned 'Enterprise and Employment' and has remained vacant/in agricultural use for a number of years.

Submission ELAP-D-13 is seeking to have an approximate site area of 2.44 hectares, zoned from 'Community Services/Facilities' to 'Enterprise and Employment'.

The zoning of the site (Community Services/Facilities) as proposed in the Draft Edenderry Local Area Plan 2023-2029 is shown below:



#### **Draft Edenderry Local Area Plan 2023-2029 – Proposed Community Services/Facilities**

The existing total of 'Community Services/Facilities' zoned land in the Draft LAP for Edenderry is approximately 36ha. The existing total of 'Enterprise and Employment' zoned land is approximately 83.5ha.

Given the existing vacant 'Enterprise and Employment' zoned land at this location, it is considered there is an adequate quantum of zoned land at this location, in addition to the range of other 'Enterprise and Employment' zoned land to the north and east of the town.

In addition, and related to the second point of the submission in relation to relocating the proposed pedestrian bridge further south, the Grand Canal spur is considered a unique attribute of Edenderry that is intended for enhancement as an amenity into the town and linking with the wider Grand Canal Greenway network, as well as with walking and cycling routes within the town including to the recently upgraded Blundell Park. The proposed pedestrian bridge was subject to a feasibility study that identified the link via Blundell Wood as the most beneficial location for the proposed pedestrian bridge to allow for walkability, permeability and connectivity within the area. The proposed bridge will link with a wider objective for a cycle/pedestrian route that will connect with the R402 to the west as illustrated within the Draft Local Transport Plan for Edenderry (Appendix 2 of the Draft LAP). I therefore do not support the relocation of the proposed pedestrian bridge.

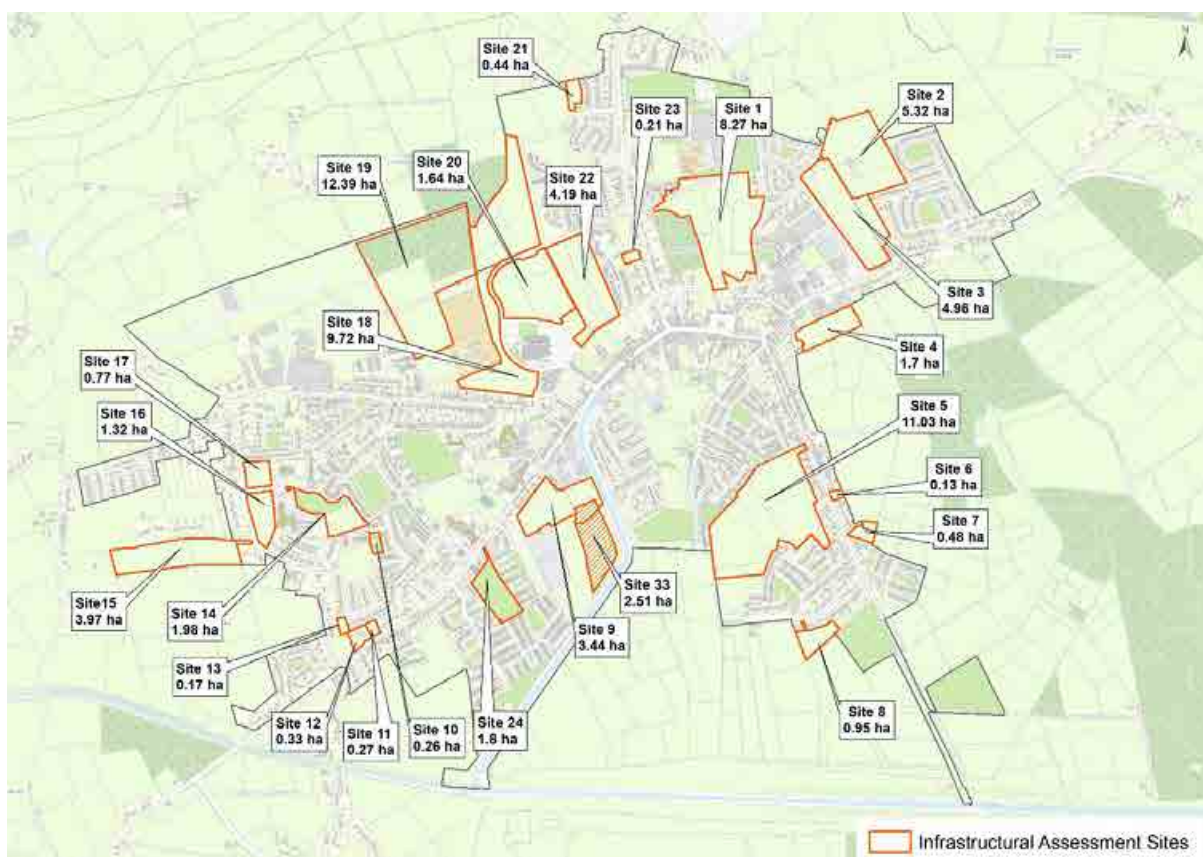
I consider maintaining the existing zonings at this location allows for the proper planning and sustainable development of the area. Maintaining a Community Services/Facility land use zoning along the Grand Canal Greenway corridor is considered an appropriate and beneficial use along this route.

Planning and Infrastructural Assessment:

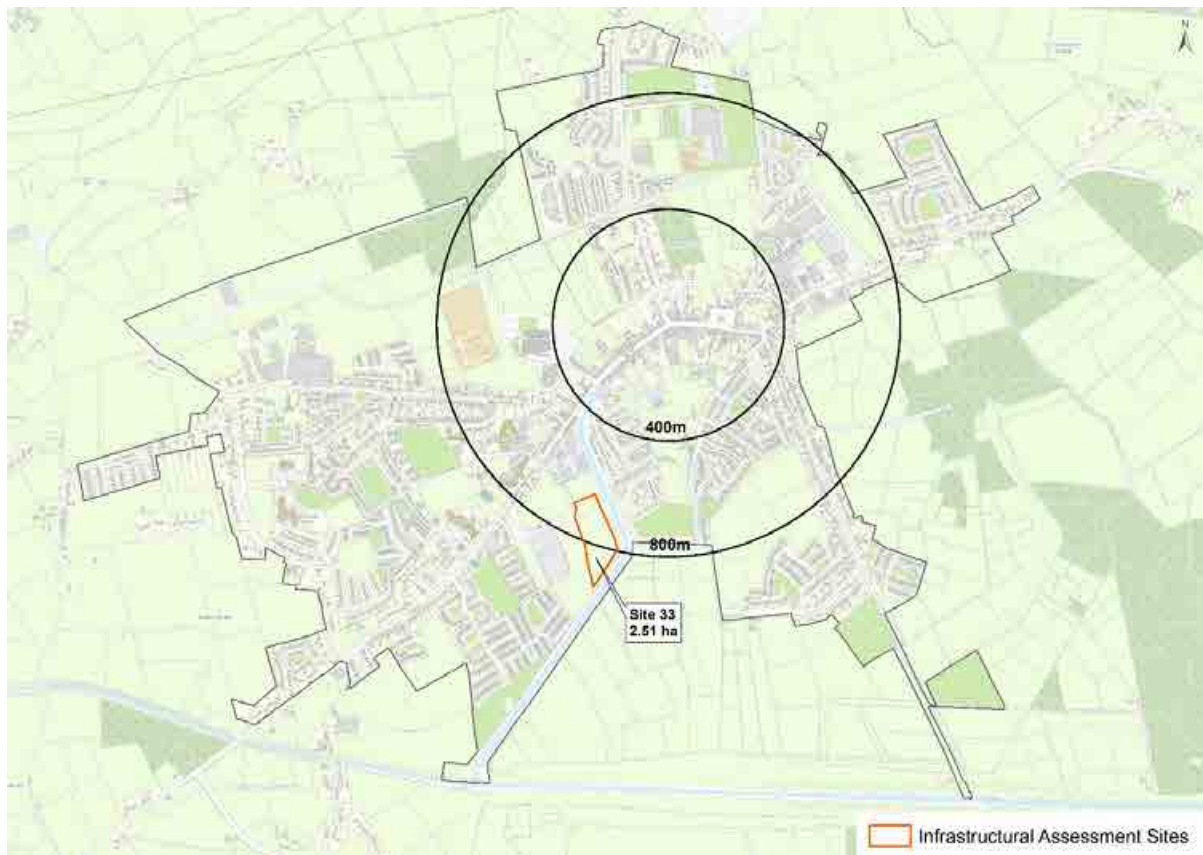
I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre
- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 33' in proposed revised mapping in the Planning and Infrastructural Assessment.



**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment**



**Figure 10.2 Distance of sites from Edenderry Town Centre**

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
33	South side of Edenderry Business Park	2.51 ha.	Vacant greenfield site adjacent to Grand Canal Greenway. Access to site would be through Edenderry Business Park or land to the west.

**Table 10.2: Site Appraisals**

Site No.	Criteria	Recommendation	Justification
33	Promotes compact growth & sustainable mobility	Zone 'Community Services and Facilities'.	Independent road access to this landholding is restricted. It is considered that a 'Community Services/Facilities' zoning would allow for complementary uses to the amenity of the Grand canal Greenway.  The zoning would allow for community access directly from the potential location of a pedestrian
	Promotes sustainable mobility		
	Availability of infrastructure & Services		
	Physical suitability and accessibility		

Site No.	Criteria	Recommendation	Justification
			bridge across the Grand Canal and connections to the wider area.

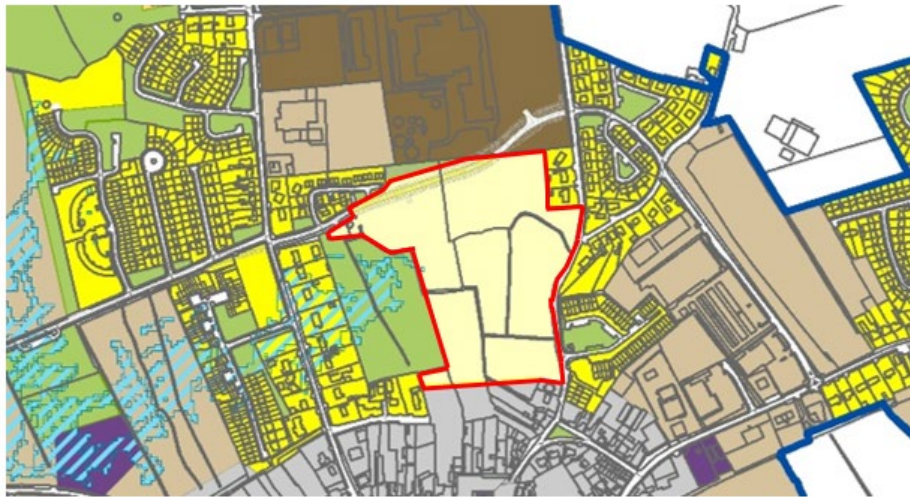
**Ref: ELAP-D-11****Person / Body:** Imelda Murray on behalf of Frank Murray**Summary of submissions / observations:**

This submission;

1. States that the urban area has reduced significantly by only the built up area being included in the local area plan boundary;
2. Queries if land zoned 'New Residential' to the north of the town is available and suitable for housing and that its proximity to an operational pig farm makes it unsuitable for residential development;
3. States that the Council should acquire land close to the town centre for affordable sites and zone land for less dense development and single house construction as there is a demand for this type of development, on the edge of town and within town boundaries.

**CE Response:**

1. The plan boundary shown in all maps in the Draft Plan reflects the existing built footprint of the town while also adhering to;
  - *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*
  - *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'*
  - National Strategic Outcomes which underpin the NPF, including NSO4 (Sustainable Mobility), NSO9 (Sustainable Management of Water, Waste and other Environmental Resources), and NSO8 (Transition to a Low Carbon and Climate Resilient Society).
2. It is presumed that this point of the submission refers to the land shown in the below map as it is the only land proposed to be zoned 'New Residential' in the north of the town in the Draft Plan.



The recommendation to zone the subject land as 'New Residential' is based on an appraisal of infrastructural and planning assessment criteria including the promotion of compact growth, sustainable mobility, availability of infrastructure and services, and physical suitability from Chapter 10 Planning and Infrastructural Assessment in the Draft Plan.

The northern portion of the subject land is at a higher level than the southern half and is good ground. Whilst the southern half is more low lying and peaty, it is relatively dry as there is a network of drains through the land and subject to good foundations being in place with any development, it is suitable for a 'New Residential zoning'. It is noted that residential developments have been constructed on lands with peaty subsoils at Carrickhall and Ard na Carraige adjacent to the subject lands in addition to Edenderry Shopping Centre.

In addition, the recently opened Northern Relief Road from Clonmullen Lane to St Conleths Road via Clonmeen Rise provides good road access to the subject lands while the future development of the Inner Relief Road to the north of the town centre will open up lands to the south of the landholding.

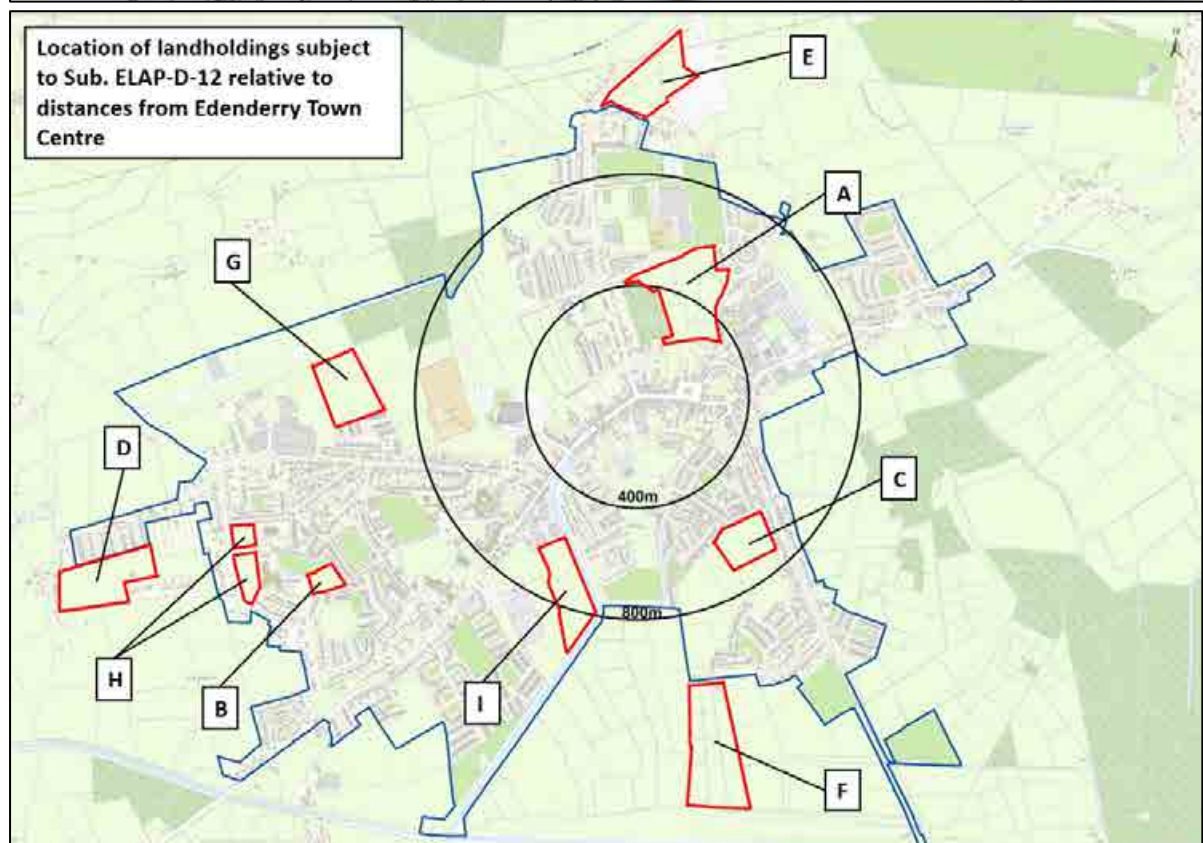
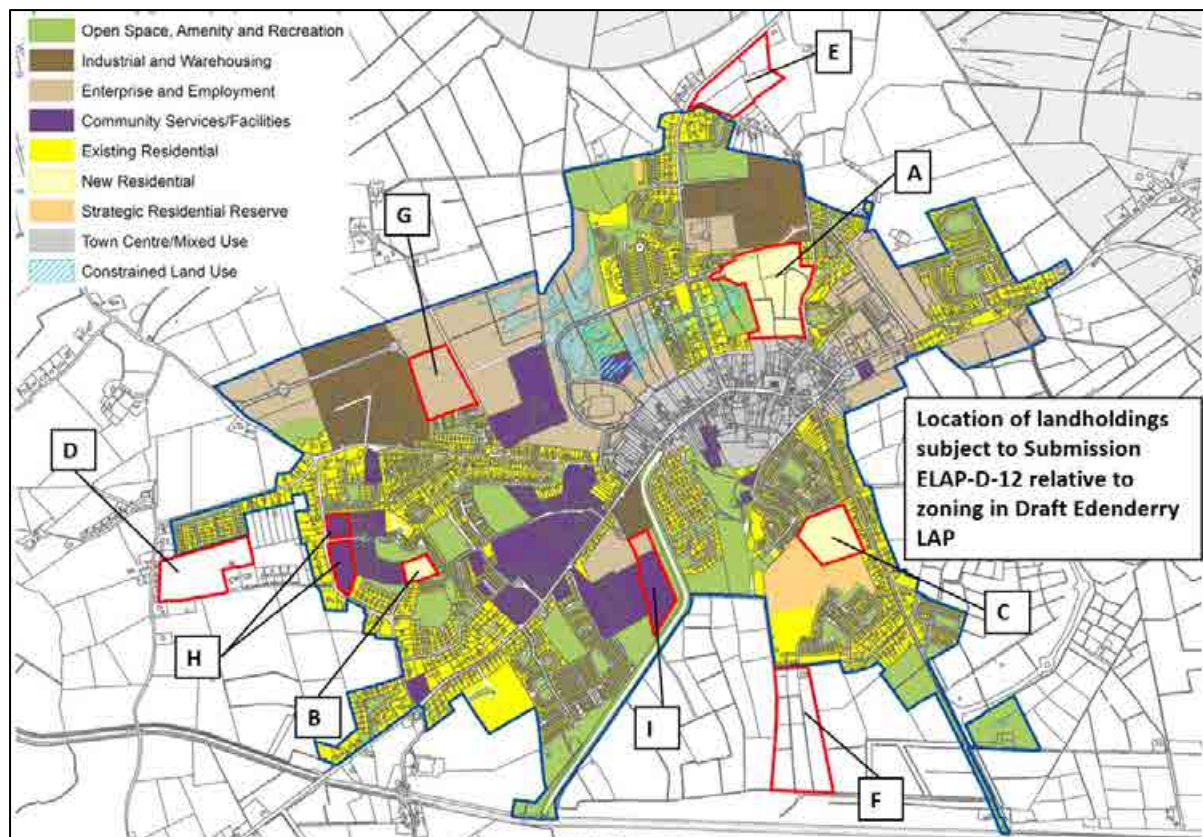
3. The land proposed for 'New Residential' zoning in the Draft Plan promotes compact growth and sustainable mobility (see Figure 10.2: Distance of sites from Edenderry Town Centre in Chapter 10 of the Draft Plan). The 'Low Density Residential' land use zoning referred to in this submission is no longer in use within Offaly Development Plan documents and it is therefore not appropriate to provide this zoning within the development boundary of Edenderry LAP. It should be noted however that the 'New Residential' zoning covers a range of densities and is considered more than appropriate to provide for the Core Strategy allocation for Edenderry.

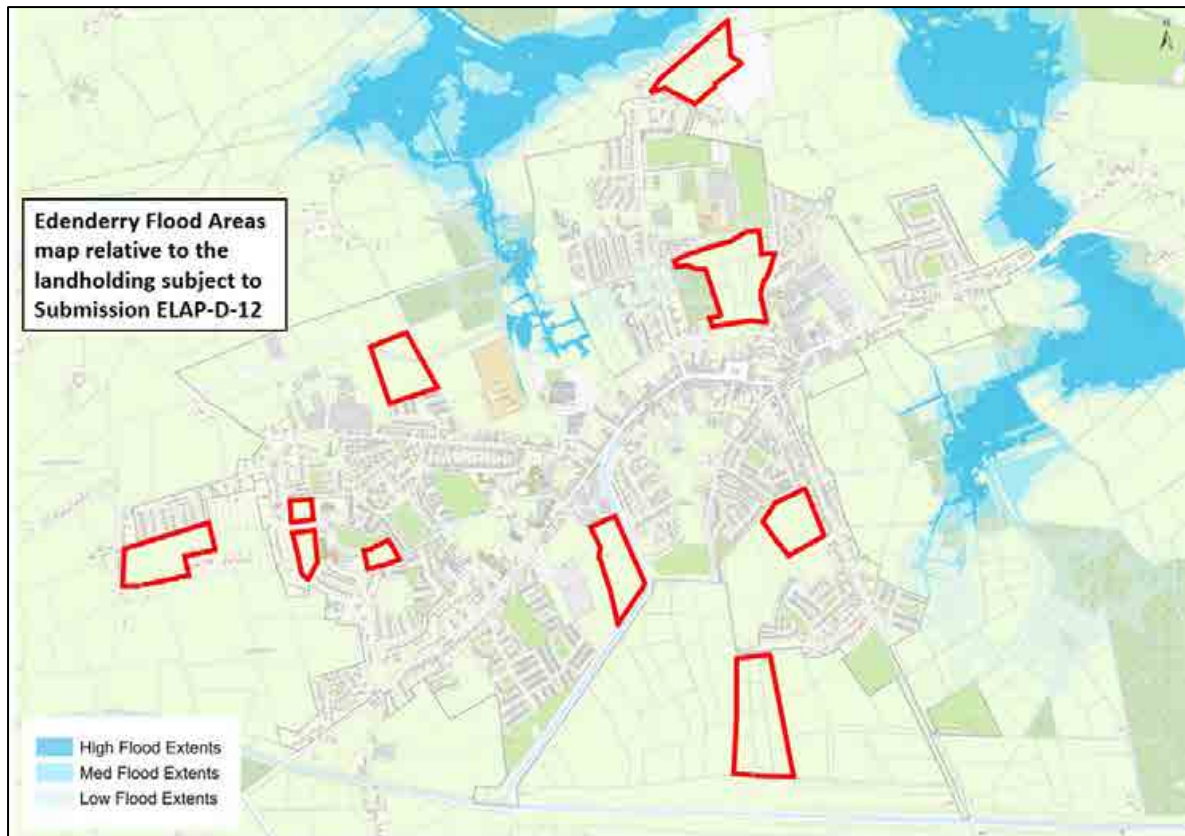
**Ref: ELAP-D-12****Person / Body: Cllr Noel Cribbin****Summary of submissions / observations:**

This submission;

1. States that it is disappointing that the inner relief roads at Granary Court and Clonmullen are not shown on the Draft Plan;
2. States that it is also disappointing to see the plan boundary for the town reduce so significantly.
3. Comments that the 2 bus stops at Aldi and Conlons garage be recessed to allow for traffic flow
4. Proposes that lands at Clonmullen opposite Rosderra Plant (labelled A on map) be rezoned 'Industrial and Warehousing' as the land is poor and boggy and would be too costly to develop;
5. Proposes that lands at Killane Drive (labelled B on map) not be zoned for 'New Residential' as there exists over 250 houses in close proximity to the subject site and to zone lands would create a 'concrete jungle and possible anti- social black spots';
6. Proposes that lands to the rear of Fr Paul Murphy Street (labelled C on map) not be zoned for 'New Residential' as the lands are close to approximately 400 houses in adjacent estates and to zone lands would create a 'concrete jungle and possible anti- social black spots';
7. Proposes that lands at Back Road, Killane (labelled D on map) be zoned 'Housing' as the site is a good location surrounded on all sides by housing, services are in place and site is only a 5 minute walk to 3 primary schools and 15 minutes to all other remaining schools in town;
8. Proposes that lands in Clonmullen (labelled E on map), at the junction of Clonmullen and Kinnegad Road be zoned Residential as Offaly County Council developed a mix of private houses and council houses on a similar site elsewhere in Clonmullen. It is also stated that the subject site is located close to the GAA grounds, swimming pool while the site is a 15 minutes' walk to Dunnes Stores, Oaklands College, Edenderry and St. Marys Secondary School.
9. Proposes that lands at Tyrrells Lane (labelled F on map) be zoned Residential as the site lies adjacent to a proposed walkway, cycleway and greenway allowing children to travel off road to school;
10. Proposes that lands at the rear of St Patricks Road (labelled G on map) be zoned Residential as the lands are a great location close to all schools, the town centre and a proposed inner relief road;
11. Proposes that lands (labelled H on map) at Back Road, Killane in front of Scoil Bhríde and Gaelscoil and to the rear of the Edenderry Business Park be zoned 'New Residential' as these lands are not needed for school extensions and would be suitable for low density housing for first time builders;
12. Proposes that lands to the rear of Edenderry Business Park (labelled I on map) be changed from a Community Services/Facilities zoning to an Enterprise and Employment zoning as a large employer is proposing to build a very substantial industrial unit to expand his company and workforce;
13. States that it is great seeing the development of the Tesco site and the Blundell masterplan progress and that off street parking from the Main street is needed, the site would be ideal for a Primary Care facility and that the Department would fund a scheme of houses for the elderly in Edenderry subject to significant interest.

Please note as the submission map does not include site boundaries, only including a number and text outlining the indicative location of each site, the CE Report presumes that the extent of each zoning request is the nearest field boundary. In the interest of clarity, the map below also includes a reference to each zoning request included in this submission.





#### CE Response:

1. The inner relief roads at Granary Court and Clonmullen are shown on the revised zoning map in response to Submission ELAP-D-25.
2. The plan boundary shown in all maps in the Draft Plan reflects the existing built footprint of the town while also adhering to;
  - *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'
  - *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that 'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'
  - National Strategic Outcomes which underpin the NPF, including NSO4 (Sustainable Mobility), NSO9 (Sustainable Management of Water, Waste and other Environmental Resources), and NSO8 (Transition to a Low Carbon and Climate Resilient Society).
3. Issues relating to the configurations of bus stops are within the remit of the National Transport Authority.
4. The northern portion of the subject landholding is at a higher level than the southern half and is good ground as evidenced by the below EPA subsoil map. Whilst the southern half is more low lying and peaty, it is relatively dry as there is a network of drains through the land and subject to good foundations being in place with any development, it is suitable for a 'New Residential zoning'. It is noted that residential developments have been constructed on lands

with peaty subsoils at Carrickhall and Ard na Carraige adjacent to the subject lands in addition to Edenderry Shopping Centre. It is also noted that the OPR submission Ref ELAP-D-29 states that *'The consolidation of the employment and enterprise land use zoning through the rezoning of some such land for new residential is a positive approach'*.

5. Table 10.2 in Chapter 10 Planning and Infrastructural Assessment outlines the infrastructure and planning criteria relating to land use zoning recommendations and recommends in relation to Site No. 14 (see extract below which refers to the larger landholding which site labelled B forms part of) that it be zoned a combination of 'New residential' and 'Open Space, Amenity and Recreation';

Site No.	Criteria	Recommendation	Justification
14	Promotes compact growth	Zone combination of 'New residential' and 'Open Space, Amenity and Recreation'.	It is considered that a 'New Residential' zoning for the southern part of the land would be appropriate to the character and pattern of development in the area in addition to promoting sustainable mobility having regard to its close proximity to two schools and local amenities. A 'Open Space, Amenity and Recreation' zoning is considered appropriate for the large public space area to the north serving Killane Drive.
	Promotes sustainable mobility		
	Availability of infrastructure & services		
	Physical suitability and accessibility		

In addition, it is noted that Chapter 13 of the Offaly County Development Plan outlines a number of specific development management standards relating to the design and layout of residential developments in urban areas that provide for quality design supporting the principles of healthy place making, crime prevention through design, permeability and sustainable mobility, green infrastructure, compact growth and universal access.

6. Table 10.2 in Chapter 10 Planning and Infrastructural Assessment outlines the infrastructure and planning criteria relating to land use zoning recommendations and recommends in relation to Site No. 5 (see extract below which refers to the larger landholding which site labelled C forms part of) that it be zoned a combination of 'New Residential' and 'Strategic Residential Reserve';

Site No.	Criteria	Recommendation	Justification
5	Promotes compact growth	Zone a combination of 'New Residential' and 'Strategic Residential Reserve.'	Having regard to part of this site being located within convenient walking distance of the town centre in addition to the established residential character of the area, it is considered reasonable to zone the field in the north eastern site of
	Promotes sustainable mobility		

Site No.	Criteria	Recommendation	Justification
	Availability of infrastructure & services		the landholding for residential development.
	Physical suitability and accessibility		The remainder of the landholding can be considered in subsequent Local Area Plans.

7. See response to submission ELAP-D-07.
8. See response to submission ELAP-D-06.
9. See response to submission ELAP-D-04.
10. The Local Authority is bound by the population figures provided in the National Planning Framework, Regional Spatial and Economic Strategy for the Eastern and Midlands Region and the Offaly County Development Plan 2021-2027. Having regard to the 'Enterprise and Employment' zoning of the land, it is considered that there are other lands within the town that are more appropriately located for 'New Residential' zonings, closer to the town centre that support compact growth in line with the principles of National Planning Framework (National Strategic Outcome 1) and the Regional Spatial and Economic Strategy (Regional Strategic Outcome 2) that will deliver the Core Strategy housing allocation for the town over the lifetime of the development plan.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.*'

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned approximately 11.75 hectares of land 'New Residential'. This submission proposes to unacceptably exceed the allocation by 4.20 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs:resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

In addition Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

Accordingly, I do not recommend amending the zoning of the subject site and to retain the 'Enterprise and Employment' zoning in line with the strategic function of the site to provide employment generating land uses in proximity to the next phase of the Edenderry Inner Relief Road.

11. It is considered prudent to provide for lands for new schools and ancillary school facilities in the plan to allow for future population increases as supported by the following policy and objectives of the draft LAP:

**CP-02** Support and facilitate improvements to existing primary and post-primary schools if necessary to facilitate increased population including the influx of refugees in the short-medium term.

**CO-03** Have regard to the guidance and recommendations of ‘The Provision of Schools and the Planning System - A Code of Practice for Planning Authorities, the Department of Education and Skills (DoES) and DoECLG’, July 2008, as well as other national guidance, as appropriate for the provision of schools by ensuring that suitable lands are zoned for educational uses within the boundary of Edenderry during the lifetime of the plan.

The lands proposed for Community Services/Facilities lies adjacent to existing schools and within convenient walking and cycling distances of a number of residential areas. It is noted that the Department of Education in their submission notes the critical importance of ensuring sufficient land is zoned for these purposes.

12. See response to submission ELAP-D-10.

13. Noted. It is noted that the following policies in Chapter 3 of the Draft Plan apply to potential uses, design, layout and connectivity within the Blundell masterplan area;

**TCP-03** Facilitate the redevelopment and enhancement of the Blundell Lands Opportunity Site for a mixture of uses that will contribute to the vibrancy, diversity, vitality, attractiveness, safety, liveability and compact growth of Edenderry Town Centre. In conjunction with this, proposed developments must demonstrate how they will interact within its context and the wider urban area and shall be in accordance with section 3.3 of this Local Area Plan and section 7.2.4 of the Offaly County Development Plan 2021-2027 and the Blundell Masterplan 2020.

**TCP-11** To require that developments within or adjacent to the area of the Blundell Masterplan, Edenderry, 2020 demonstrate adherence to the urban design, place making and connectivity principles for the masterplan area.

### **Ref: ELAP-D-13**

### **Person / Body:**

**Councillor Robert McDermott**

### **Summary of submissions / observations:**

1. The submission seeks the upgraded status of the R402 to National Secondary Route to be brought to the attention of the Eastern and Midland Regional Authority (EMRA) and for the Regional Spatial and Economic Strategy to be amended accordingly.
2. The provision of a Greenway along the R402 corridor should be supported as a priority.
3. The submission seeks a number of amendments to the Local Transport Plan including the alteration of priorities from Medium to High for walking infrastructure and for Roads infrastructure as follows:
  - a. Blundell Avenue has no wheelchair accessibility on footpath
  - b. Fr. McWey Street has no wheelchair accessibility on footpath
  - c. New Footway at Tyrell’s Lane to be changed from medium to high
  - d. Cycle link from Cokery Lane to Grand Canal Greenway to be changed from medium to high
  - e. Pedestrian crossing at Francis Street to be changed from low to high
  - f. Restrict right hand turns at junction of Blundell Avenue (Granary court) and JKL Street
  - g. Road widening at R441 to be changed from medium to high

- h. Improvement works to Downshire link to be changed from medium to high
  - i. Potential for south western link from Business Park to R402 should be changed from low feasibility to high
4. The submission seeks the rezoning of two separate portions of land from New Residential to Industrial/Warehousing and from Community Services/Facilities to New Residential.

#### CE Response:

1. It is beyond the remit of this Local Area Plan to amend the RSES or to change the status of the R402 onwards to Tullamore. This would be part of a wider review of road status by the National Roads Authority (NRA) in conjunction with Local Authorities. I therefore do not propose any alterations to the Draft Plan on foot of this point of the submission.
2. Figure 21 of the Local Transport Plan (LTP) shows an excerpt from the Transport Infrastructure Ireland (TII) National Cycle Network (NCN) Consultation map which is considering cycling routes which may include the former rail-line, although that is yet to be determined. The following objective of the draft LAP states:

**CIO-04** Support the delivery of the infrastructure proposed in the Local Transport Plan (LTP) subject to funding being made available.

There may also be the potential for this former railway line to be considered for reopening/reconstruction within the All Island Strategic Rail Review and therefore the prioritisation for a cycle way at this point in time would be premature pending more detailed review.

Section 9.2.3.2 of the draft LAP notes:

*“Section 8.5.2 of the Offaly County Development Plan 2021-2027 states that ‘the provision of a rail link from Mullingar directly to Clara would create an integrated rail network linking Longford, Mullingar, Ballinasloe, and Athlone with Tullamore, Portarlinton, Kildare and Portlaoise. The final link in the network could involve the provision of a new rail line from Enfield to Edenderry with a continuation to Portarlinton (possible junction at Garryhinch). This rail line, if provided, would be of great strategic importance in the context of the midlands. Many of the wayleaves between Portarlinton and Enfield are in the ownership of Bord na Móna’. Alternatively or in conjunction with the re-establishment of the Edenderry – Enfield rail-line and service, the former railway line / adjacent lands could be considered for use as a cycle link between the two towns”.*

3.
  - a. The newly opened Blundell Avenue was constructed to current standards. However connecting of the pre-existing adjacent route (Granary Court) may require upgrades to enhance accessibility to current standards. Footway renewal/upgrade Policies CIP-01 and CIP-02 and Objective CIO-06 provide sufficient support to prioritisation of these infrastructural interventions as follows:

**CIP-01** *Promote enhanced connectivity for pedestrians and cyclists within Edenderry in order to improve access to the town centre, local schools, residential areas, recreational facilities, public transport services and other amenities.*

**CIP-02** *Improve accessibility and movement within Edenderry, reduce dependency on private car transport, increase permeability in the town, and encourage the use of energy efficient forms of transport through the promotion of walking, cycling and public transport.*

**CIO-06** *To reallocate corresponding roadspace within Edenderry to walking, cycling and public transport to accompany / occur concurrently with the provision of additional roadspace capacity under CIO-05. This may take the form of removing traffic from streets, removing lanes of traffic, narrowing carriageways, traffic management measures, or removing on-street parking to provide cycle tracks or widened footpaths.*

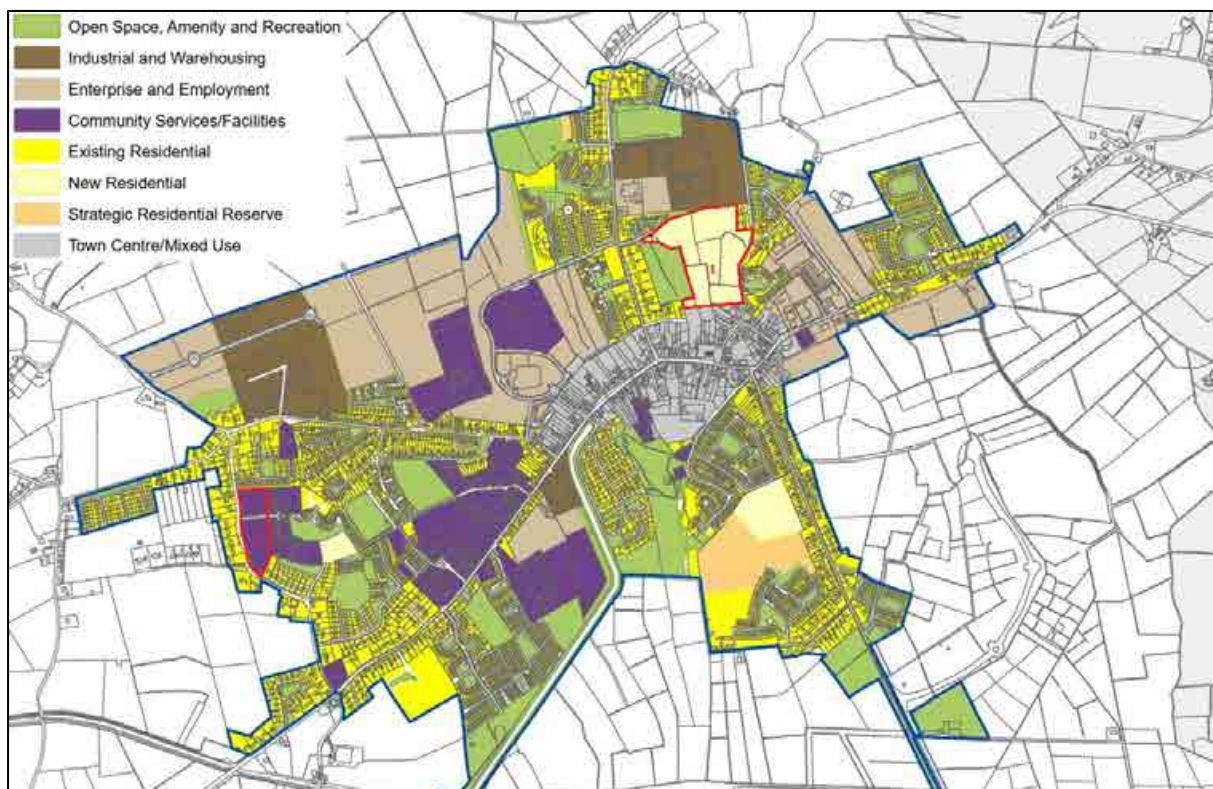
- b. Offaly County Council will consider auditing the Fr. McWey Street entrance to the shopping centre in the context of wheelchair accessibility. It is not a function of the Local Area Planning process to provide for this audit and it is sufficiently allowed for within policies CIP-01 and CIP-02 and Objective CIO-06.
- c. In Chapter 4 Plan Finalisation, W09 becomes WP5 (New Footway along Tyrell's Lane) which has Medium Feasibility and a Medium Timeframe for Delivery. This is a function of the availability of funding, capacity of design and delivery resources and the priority in terms of projected usage (i.e. centre of town or adjacent to school would be higher priority).
- d. The proposed cycling infrastructure CO3 has a higher feasibility than WP5 as the pavement already exists, it just requires minor modification (removal of traffic islands, line marking, etc.).

The proposed cycling infrastructure CO3 is Medium feasibility, as this multifaceted intervention (drainage, surfacing, street furniture) requires some design development and funding has not yet been secured. I therefore do not recommend any alteration to the Draft Plan on foot of this point of the submission.

The proposed cycling infrastructure CO12 (Cokery Lane to Grand Canal Greenway) is Medium feasibility as this multifaceted intervention (drainage, surfacing, fencing, etc.) requires some design development and funding has not yet been secured. I therefore do not recommend any alteration to the Draft Plan on foot of this point of the submission.

- e. The feasibility of the proposed pedestrian crossing on Francis Street adjacent to St. Marys Secondary School is low as it requires land acquisition which is resource intensive and takes time. Design development would also be required which would add to project timelines and overall feasibility at this stage. I therefore do not recommend any alteration to the Draft Plan on foot of this point of the submission.
- f. The submission refers to the junction of Blundell Avenue and JKL Street. It is assumed this point of the submission is related to the junction of Granary Court (which extends from Blundell Avenue) and JKL Street. Any change to this junction arrangement would require more detailed consideration and public consultation. The Council will review the possibility of this alteration as part of separate process to the LAP. This is allowed for under Policy CIP-02 in terms of improving movement and accessibility in the town.
- g. Feasibility of road widening of the R441 at Monasteroris is identified as Medium as it requires land acquisition which is resource intensive and takes time, as well as requiring detailed design.

- h. Improvement works to Downshire Link requires detailed design, the installation of surface water drainage and full depth road reconstruction, which requires significant funding and therefore precludes the alteration of this priority from medium to high.
  - i. Currently there is a pipeline of significant infrastructure projects already identified with a higher priority than the queried link, south west from the Business Park to the R402, for example Edenderry Inner Relief Road Phase 2 and Monasteroris R441 upgrade. This renders the development of a south-westerly link as lower priority in comparison. Furthermore, no funding has been secured for developing this route, and is unlikely to be secured in the short to medium term while the aforementioned projects are in development/on-going. I therefore do not recommend any alterations to the draft plan on foot of the above points of the submission.
4. The two areas of land proposed for rezoning in the subject submission are illustrated in the Figure below:



**Land banks 1 and 2 as identified in Submission ELAP-D-13**

The area identified as No. 1 on the above graphic is zoned New Residential in the Draft LAP given the strategic location of the land in proximity to the Town Centre and the newly constructed relief road that will allow for ease of access, connectivity to cycle and pedestrian routes and support compact growth objectives as set out in National, Regional and County Planning Policy. The subject site is the most suitable land bank in proximity to the Town Centre that can provide sequential development. There is a previous permission for 266 dwellings at the subject site, which clearly identify the site as suitable for development. I therefore recommend no alterations to the draft plan on foot of this element of the submission.

The area identified as No. 2 on the above graphic is currently zoned Community Services/Facilities and is required for the potential future expansion of existing schools at this location. To rezone this site as New Residential would also conflict with core strategy figures for residential growth, with other sites in the town allocated for new residential development during the lifetime of the plan. Both of these sites referenced in the submission have been assessed in the PIA under sites No. 1, 16 and 17.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'* It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 2.09 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlinton Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

The subject lands are zoned as 'Business / Employment' in the current LAP 2017-2023. It is noted that the OPR submission Ref ELAP-D-29 states that *'The consolidation of the employment and enterprise land use zoning through the rezoning of some such land for new residential is a positive approach'*.

In addition Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

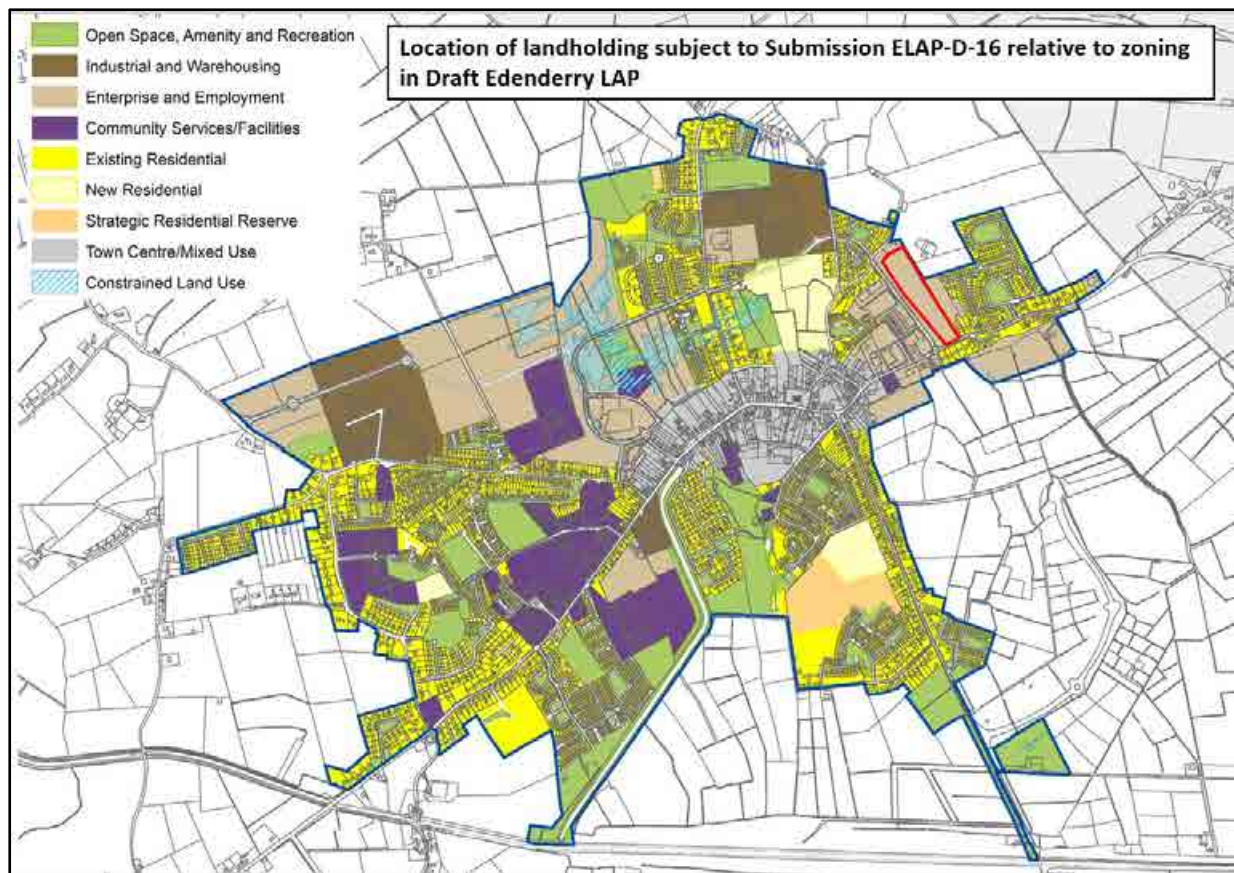
Accordingly, taking all of the above points into consideration, I do not recommend zoning the subject site in the manner sought.

#### **Ref: ELAP-D-16**

**Person / Body:** Cllr Robert McDermott

#### **Summary of submissions / observations:**

This submission requests that this site (shown outlined in red on map below) have its zoning changed from Enterprise and Employment to 'New Residential' as it is located adjacent to the Boyne Meadows so services are in situ. This site was previously zoned residential.

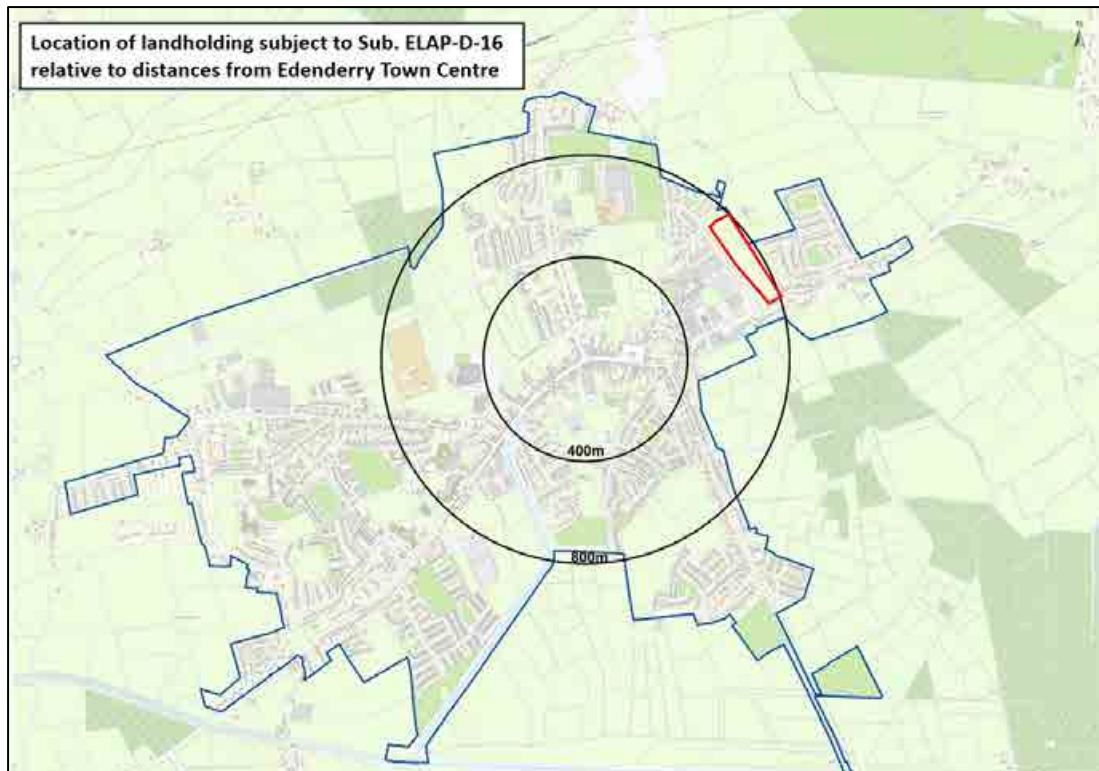


### CE Response:

#### Zoning Request:

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reason;

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.*' It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.



The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 2.99 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

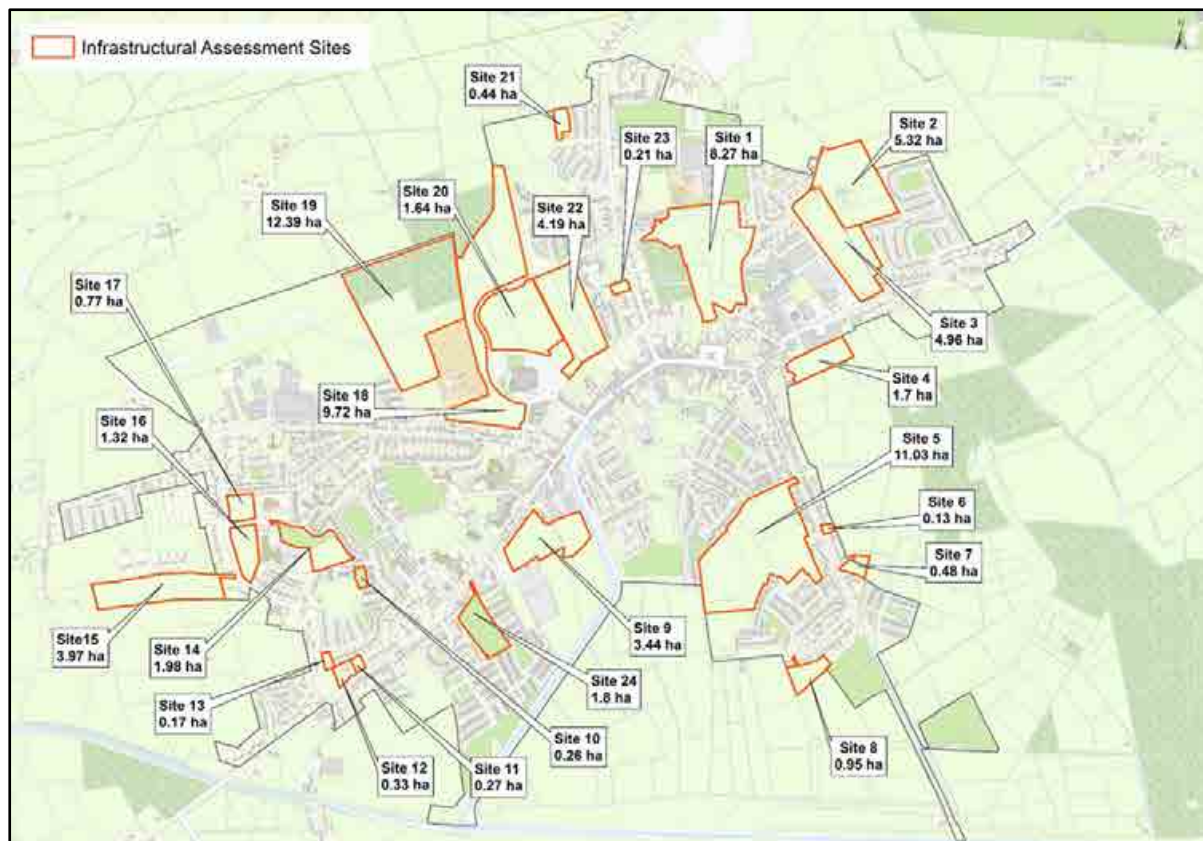
2. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

#### Planning and Infrastructural Assessment:

It is noted that this site was assessed as part of a larger landholding already in Chapter 10 Planning and Infrastructure Assessment from the Draft LAP in Table 10.2 as outlined below.

**Table 10.2: Site Appraisals**

Site No.	Criteria	Recommendation	Justification
3	Promotes compact growth	Zone 'Enterprise and Employment'	Having regard to the proximity of the site to the existing major retail areas to the west and good road and walking accessibility from the inner relief road and the R402/Dublin Road, an Enterprise and Employment zoning is considered reasonable.
	Promotes sustainable mobility		
	Availability of infrastructure & services		
	Physical suitability and accessibility		



**Ref: ELAP-D-17**

**Person / Body: Office of Public Works**

**Summary of submissions / observations:**

1. The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Edenderry Local Area Plan 2023 - 2029.

This submission is made specifically concerning flood risk management. Further submissions on the Issues Paper may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes:

- To manage flood risk in accordance with the Guidelines and circular PL02/2014
- Objectives CAP-08 and TCP-13 to incorporate Sustainable Urban Drainage Systems and other nature-based solutions

The following comments highlight opportunities for the Draft Plan before it is finalised.

2. **Flood Zone Mapping and the Sequential Approach**

The land use zoning maps have not been overlaid with the flood zone maps, therefore it is difficult to assess if the zonings/sites are at flood risk or if the sequential approach has been applied.

The sequential approach uses mapped flood zones alongside considerations of the vulnerability of different types of development to give priority to development in zones of

low flood probability. Only if there are no reasonable sites available in zones of low flood probability should consideration be given to development in higher flood probability zones. To demonstrate that the sequential approach has been applied, flood zone maps should show the proposed land use zonings overlaid with both Flood Zone A and B.

### **3. Preliminary Flood Risk Assessment (PFRA)**

PFRA indicative flood maps have been superseded by the recently published national indicative fluvial, coastal and groundwater flood mapping, and therefore the mapping provided in 2012 should no longer be used. Planning Authorities may need to carry out their own Flood Risk Assessments to inform the definition of Flood Zones for areas less than 5km<sup>2</sup> that were not included in the National CFRAM and NIFM Programmes.

### **4. Constrained Land Use**

A Constrained Land Use zoning is described as applying to the Plan area, however the Constrained Land Use zoning type is not shown on the Zoning Map for Edenderry.

An objective has been included in relation to the constrained land use zoning, LUZO-13 “Facilitate the appropriate management and sustainable use of flood risk areas designated as ‘Constrained Land Use’ in the zoning map in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as amended, in consultation with the OPW”. This objective should clarify that new development within the zoning is limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B, and that a detailed SSFRA will be required. The objective should ensure that the restrictions on the Constrained Land Use zoning is supported by, and are not used in-lieu of, a Plan-making Justification Tests.

While the NIFM flood extents are outside the Plan area, the Constrained Land Use shown in Figure 8.3 covers lands outside the Plan area and only shows the National CFRAM flood extents, please note there are also NIFM extents in this larger area. Offaly County Council should review the Constrained Land Use illustrated in the Draft Plan.

### **5. Justification Tests**

There are a number of proposed land use zonings, some of which are classified as highly vulnerable development in the Guidelines, which have been described as being in Flood Zones A and B, for which no commentary has been included to indicate that the Plan Making Justification Test has been applied and passed.

Any lands that are undeveloped within the Constrained Land Use zoning, where inappropriate development is proposed, should be rezoned as a water compatible type zoning in Flood Zone A, and less vulnerable or water compatible type zoning in Flood Zone B, or a Plan-making Justification Test should be carried out by the local authority.

For sites that are intended to be zoned for development following the application of a Justification Test where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.

Circular PL 2/2014 provides advice and detail to planning authorities on existing, developed, zoned areas at risk of flooding. "In some instances, particularly in older parts of cities and towns, an existing land use may be categorised as a "highly vulnerable development" such as housing, be zoned for residential purposes and also be located in flood zone A/B. Additional development such as small scale infill housing, extensions, or changes of use that could increase the risk or number of people in the flood-prone area can be expected in such a zone into the future. In these instances, where the residential / vulnerable use zoning has been considered as part of development plan preparation, including use of the Justification Test as appropriate, and it is considered that the existing use zoning is still appropriate, the development plan must specify the nature and design of structural or non-structural flood risk management measures required prior to future development in such areas in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced. Planning authorities should consider the issues and opportunities raised in section 4 of Appendix B (Technical Appendices) in this regard, and may consider including certain objectives or conditions as part of the zoning".

## **6. Existing Residential**

There are Existing Residential zonings located in Flood Zone B, for which no commentary has been included to indicate that the Plan Making Justification Test has been applied and passed. Highly vulnerable development is not considered appropriate in Flood Zone B unless a Plan-making Justification Test completed by the local authority can be satisfied. Please see comments in Justification Tests section above in relation to sites that are already developed. There are also two areas zoned as Existing Residential which appear to be undeveloped and are located in Flood Zone B. Site 23 - Carrickhall/St. Conleth's Road Site is one of these sites, described in in Table 10.2 Site Appraisals as a small scale infill development. Highly vulnerable development is not considered appropriate in Flood Zone B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Please note these zonings are susceptible to an increased flood risk in the mid-range future scenario and high-end future scenario, refer to Consideration of Climate Change Impacts section below.

## **7. Community Services/Facilities**

There are two areas zoned as Community Services/Facilities which appear to be undeveloped and are located in Flood Zone A and B. Site No. 20 - Incomplete Hotel Site, is one of these areas and in Table 10.2 Site Appraisals it is stated that "Whilst it is noted that part of this site is located on land designated as 'Constrained Land Use, it is considered that this site is suitable for community services/facilities as these uses not considered vulnerable flood uses". This site is highlighted as a proposed education facility on the Local Transport Plan Proposed Infrastructure Map. Community Services/Facilities type developments and schools are considered highly vulnerable development in the Guidelines. Highly vulnerable development is not considered appropriate in Flood Zone A and B, and less vulnerable development in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied.

For the other Community Service/Facilities site where only a small proportion of the site is at risk of flooding along the periphery of the site, please see comments above regarding Justification Tests.

Please note these zonings are susceptible to an increased flood risk in the mid-range future scenario and high-end future scenario, refer to Consideration of Climate Change Impacts section below.

## **8. Enterprise and Employment**

There are areas zoned as Enterprise and Employment which appear to be undeveloped and are located in Flood Zone A. These areas are identified as Site No. 18 - North of St. Francis Street and south west of Edenderry, and Site No. 19 - Monasteries, north-west of Edenderry Shopping Centre. In Table 10.2 Site Appraisals it is stated for both sites that "Whilst it is noted that part of this site is located on land 'Constrained Land Use, it is considered that this site is suitable for enterprise and employment as these uses are not considered vulnerable flood uses for the most part". The land use zoning type Enterprise and Employment is considered less vulnerable in the Guidelines, less vulnerable development is not considered appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied. While Monasteries are not included in Table 3.1 in the Guidelines, the list is non-exhaustive and it could be considered similar to a school which is a highly vulnerable type development. Highly vulnerable development is not considered appropriate in Flood Zone A and B unless a Plan-making Justification Test completed by the local authority can be satisfied. It is stated under Table 11.1 Land Use Zoning Matrix "Note that new Permitted in Principle /Open for Consideration uses under 'Enterprise and Employment' Zoning in Flood Zone A or B shall be limited to less-vulnerable and/or water compatible uses (as per the Flood Risk Management Guidelines) This requirement will take primacy over any related provision relating to the land use zoning matrix". It should be clarified that Flood Zone A is limited to water-compatible uses and Flood Zone B is limited to less vulnerable or water compatible uses. These restrictions could be included as an objective, with the Site Appraisals, in the Section on Flood Risk Management and in the SFRA. Since only water compatible will be permitted in Flood Zone A these areas should be rezoned as a water compatible type such as Open Space.

These zonings are susceptible to an increased flood risk in the mid-range future scenario and high-end future scenario, refer to Consideration of Climate Change Impacts section below.

## **9. Proposed Inner Relief Road**

There are references to the construction of a new Inner Relief Road which will pass through flood risk areas. The Guidelines classify essential infrastructure such as primary transport as highly vulnerable, and the zoning would not be appropriate in Flood Zones A and B unless a Plan Making Justification Test, completed by the local authority can be satisfied. Local transport infrastructure is classified as less vulnerable and the zoning would not be appropriate in Flood Zones A unless a Plan Making Justification Test, completed by the local authority can be satisfied.

## **10. Consideration of Climate Change Impacts**

It is stated in Section 8.4.2 Flood Risk Management under Section 8.4 Nature-based Solutions that "OPW Guidance on climate change, avoids zoning land for development at inappropriate locations through designating these flood prone lands (see Figure 8.3 below) as 'Constrained Land Use'". However, the extents of the Constrained Land Use map appear to correspond with present day extents and not with future scenario extents. In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future and providing space for future flood defences. If Offaly County Council do include the future scenario extents in the Constrained Land Use this would demonstrate that Offaly County Council have considered climate change impacts in the preparation of this Plan, by avoiding development in areas potentially prone to flooding in the future.

Reference is made in the SFRA to '2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management'. The OPW recommend that the SFRA refer to

the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019 and the guidance on potential future scenarios contained therein.

#### **11. Arterial Drainage Schemes and Drainage Districts**

The Arterial Drainage Scheme maintained by the OPW covers a considerable area around Edenderry town. In Section 8.4.2 Flood Risk Management it is stated that “New developments will be required to ensure that access is preserved for the maintenance of the Drainage District and the OPW will be consulted with in the consideration of applications for developments in the vicinity of the Drainage District in this regard”.

The Drainage District which is maintained by Offaly County Council is north of Edenderry and outside the Plan area. The text should be updated to include that access is preserved for both Arterial Drainage Schemes and Drainage Districts, however the OPW should only be consulted in relation to the OPW Arterial Drainage Schemes, as the Drainage District is the responsibility of Offaly County Council. As the area covered by Arterial Drainage Schemes is considerable, Offaly County Council should consider including the requirement for access for maintenance as a policy objective in the Plan. The location of Arterial Drainage Schemes and Drainage Districts may be viewed on [www.floodinfo.ie](http://www.floodinfo.ie).

#### **12. Nature-based Solutions and SuDS**

The OPW welcomes objective CAP-08 to “Incorporate Sustainable Urban Drainage Systems and other nature-based surface water drainage solutions as part of all proposed developments” and objective TCP-13 to “Incorporate Sustainable Urban Drainage Systems (SuDS) and other nature-based solutions in accordance with the ‘Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, 2022’ and any subsequent editions”.

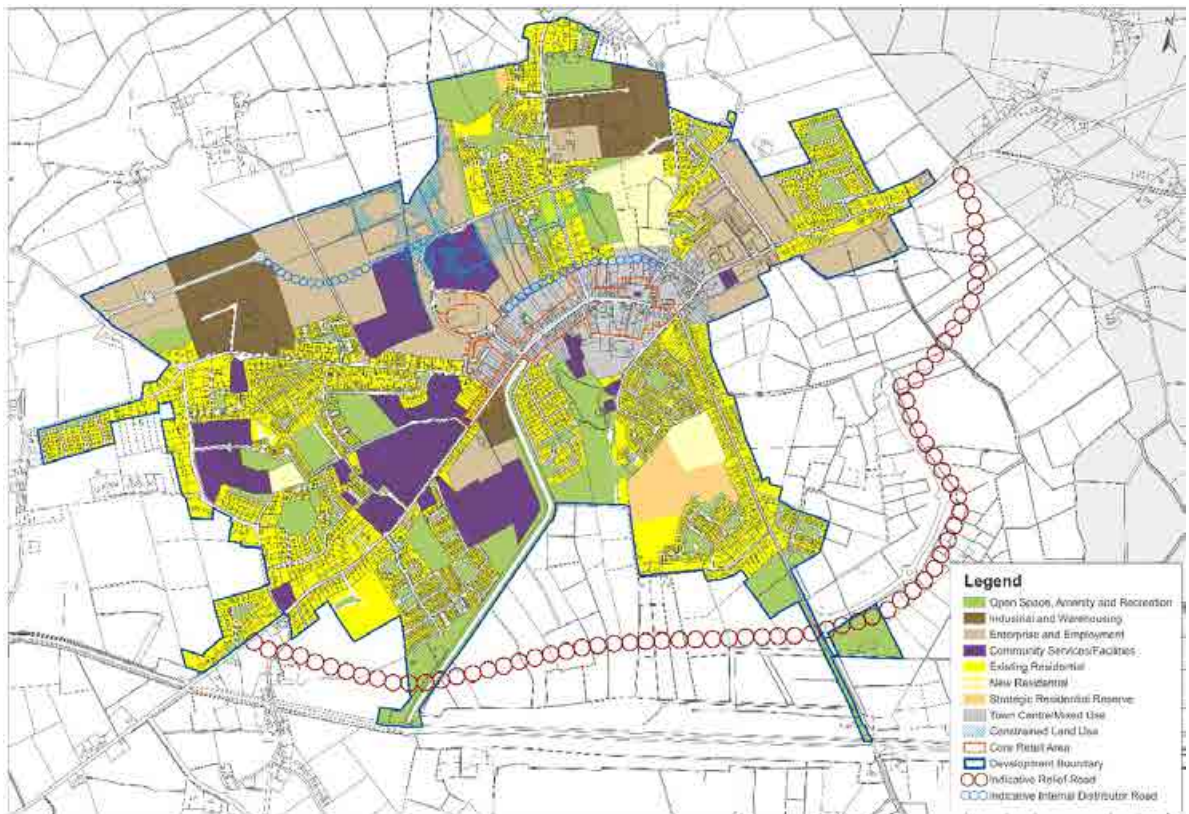
The OPW also welcomes the SuDS techniques outlined as applicable for sites that are in high groundwater levels, steeply sloping, very flat and areas in floodplains in Section 3.5 Sustainable Drainage Systems and Surface Water Guidance and Strategy. Further guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites such as the Blundell Masterplan may be considered, where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

#### **13. Errata**

In Table 5 County Development Plan Provisions relating to Flood Risk Management in the SFRA, it is unclear which point relates to which provision reference. It would be clearer if the information in the table could be presented similar way to Table 6 Draft Local Area Plan Provisions relating to Flood Risk Management. Also the last provision listed in the table, DMO-106 Flood Risk Assessments appears to be incomplete.

**CE Response:**

1. Noted.
2. Noted. Set out hereunder is the proposed amended zoning map with the CLU overlain:



The “Constrained Land Use” area is only shown within the Plan area.

3. Noted. I recommend identifying under Section 2.4 “Flood Risk Indicators” in the SFRA report that: **“The PFRA indicative flood maps have now been superseded by the recently published national indicative fluvial flood mapping. There is no national indicative fluvial flood mapping available within or surrounding the Plan area.”**
4. Noted. I recommend;
  - (a) including a version of the Land Use Zoning map within the Plan upon which Flood Zone A and B combined as a “Constrained Land Use” are overlain as set out in 2 above.
  - (b) amending LUZO-13 as follows:

“Facilitate the appropriate management and sustainable use of flood risk areas designated as ‘Constrained Land Use’ in the zoning map in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as amended, in consultation with the OPW. **New development within this area is generally limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B, and a detailed SSFRA will be required – although these restrictions do not apply where a Plan-making Justification Test has been passed.**”

5. The land use zoning and SFRA are recommended to be updated. The subject sites are addressed below in points 6 to 9.
6. Noted. I recommend that the land use zoning and SFRA be amended as follows. The zoning of the undeveloped Existing Residential sites within Flood Zones A and B should be changed to Open Space.

Draft LAP zoning:



Recommended LAP changed zoning:



I recommend the insertion of the following text and Justification Table be inserted into section 4 of the SFRA:

‘The land use zoning and SFRA has been reviewed. The zoning of the previously undeveloped Existing Residential sites within Flood Zones A and B has been changed to Open Space, Recreation and Amenity. Previously developed residential sites zoned Existing Residential have been subject to and passed the Justification Test, the details of which are recommended to be included within Section 4 of the SFRA document. The Existing Residential zoning as set out in the draft LAP is therefore still appropriate at these sites. Future development at these previously developed Existing Residential sites will be subject to site-specific flood risk assessments; and comply with the flood risk management provisions of the Plan and the existing County Development Plan (see Section 4 of SFRA), including structural and non-structural risk management measures (e.g. County Development Plan provision DMO-106 Flood Risk assessments). This is in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced’.

### Justification Test:

Area/Location	Zoning in Plan	Justification Test (Fails, if one of the following fails; All must be passed for the test to be passed)			Overall Result
		Criteria 1 (see SFRA Appendix I Figure 2) Is the settlement targeted for growth under the RSES and 2021 County Development Plan?	Criteria 2 (see SFRA Appendix I Figure 2) Is the zoning of the lands required to achieve the proper planning and sustainable development of the settlement? All sub-criteria <sup>[1]</sup> must be satisfied	Criteria 3 (see SFRA Appendix I Figure 2) A FRA to an appropriate level of detail has been carried out as part of the SEA as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere	
1. Throughout Plan Area	Existing Residential (previously developed)  Note that the meaning of the Existing Residential zoning objective has been influenced by the SFRA process and these meanings are explained in the Plan, including through the land use zoning provisions and the flood risk management provisions repeated in this SFRA report.	Yes	Yes to all of the following: (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement; (ii) Comprises significant previously developed and/or under-utilised lands; (iii) Is within or adjoining the core of an established or designated urban settlement; (iv) Will be essential in achieving compact and sustainable urban growth; and (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement	Yes. The existing use zoning is still appropriate.  Future development will: be subject to site-specific flood risk assessments; and comply with the flood risk management provisions of the Plan and the existing County Development Plan (see Section 4 of SFRA), including structural and non-structural risk management measures (e.g. County Development Plan provision DMO-106 Flood Risk assessments). This is in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced.	Pass

7. Noted. I recommend the following amendments to Site no. 20 in Table 10.2 of the draft LAP.

Draft LAP mapping:



Site No.	Criteria	Recommendation	Justification
20	Promotes compact growth	Zone 'Community Services/Facilities'	This site is located within convenient walking distance of the town centre in addition to having good accessibility through its location adjacent to the

Site No.	Criteria	Recommendation	Justification
			<p>existing Distributor Road. Whilst it is noted that part of this site is located on land designated as 'Constrained Land Use, it is considered that this site is suitable for community services/facilities as these uses not considered vulnerable flood uses. As per Objective LUZO-13 in Chapter 11 of this Plan, the Planning Authority will have to satisfy itself that any proposed use is in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as amended. This site has the capacity to accommodate a new school in compliance with the Flood Risk Management Guidelines and is therefore zoned as "Community Services/Facilities". Any main school buildings (and associated emergency access and egress points) shall be located within Flood Zone C.</p> <p>Any school at this site is likely to require infrastructure ancillary to the main school buildings (for example, amenity open space, outdoor sports and recreation and essential facilities such as changing rooms), which can be located at parts of the site within Flood Zones that are at greater risk of flooding.</p>

Site No.	Criteria	Recommendation	Justification

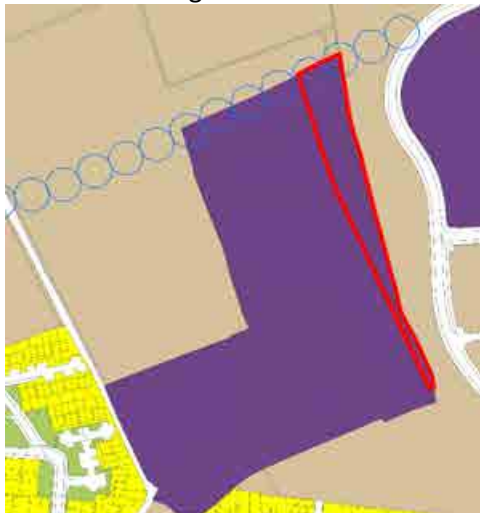
I also recommend the insertion of the following text underneath Table 11.1 Land Use Zoning Matrix:

“Permitted in Principle” / “Open for Consideration” uses under “Community Services/Facilities” shall therefore be limited in areas at elevated risk of flooding at this site, as per the Flood Risk Management Guidelines, as follows:

- In Flood Zone A, uses shall be limited to water compatible uses;
- In Flood Zone B, uses shall be limited to less-vulnerable and water compatible uses (as per the Flood Risk Management Guidelines);

These limitations shall take primacy over any related provision relating to the land use zoning matrix.”

Draft LAP zoning:



I recommended amended zoning by changing a tract of land to open space zoning based on its location within a flood risk area, as set out below:

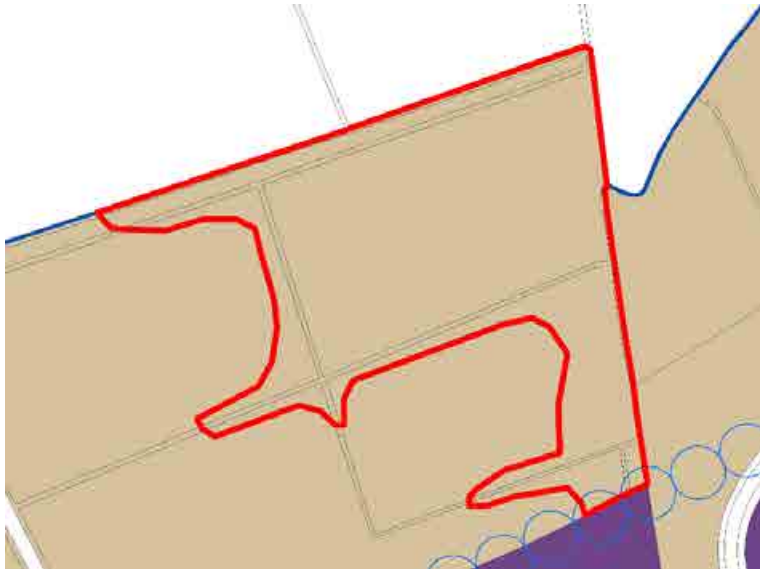


8. Noted.

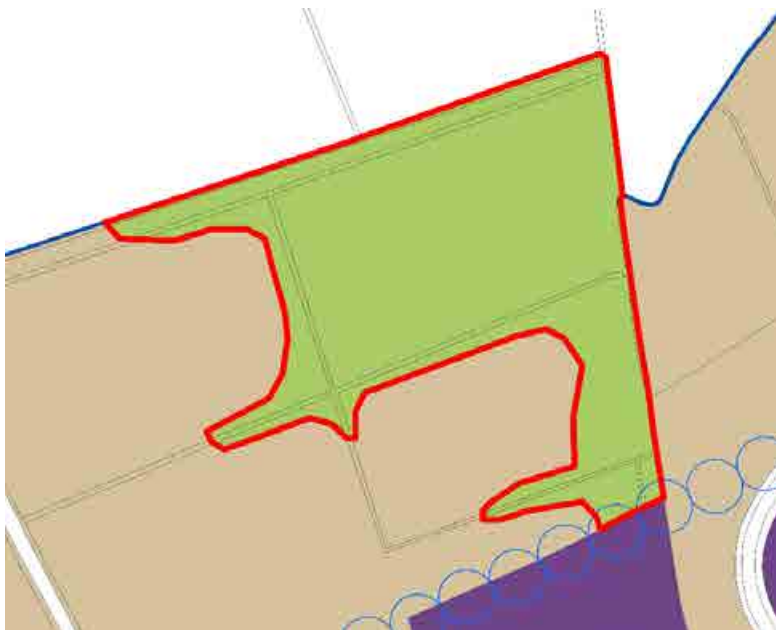
I recommend the following changes to the zoning of the subject lands:

(i)

Draft LAP zoning:



Recommended change to zoning based on Flood risk area:



(ii)

Draft LAP zoning and boundary:



Recommended removal of zoning and change to development boundary based on Flood risk area:



9. Noted. The subject road has received approval and was the subject of a flood risk assessment. Part of the road is constructed. The section that is built is recommended to feature in the maps of the Edenderry LAP, while the unbuilt but approved section is recommended to be represented by an indicative line. Accordingly, the LAP is not providing for this road, merely reflecting its provision under a separate process.
10. Noted. I recommend the insertion of the following text into Section 8.4.2 of the draft LAP, Flood Risk Management as follows:

“The Council recognises that climate change will have significant impacts on flooding, flood risk and flood risk management. This Local Area Plan, informed by a Strategic Flood Risk Assessment (SFRA) and which complies with OPW Flood Risk Management Guidelines, including with respect to requirements relating to Guidance on climate change, avoids zoning land for development at inappropriate locations through designating these flood prone lands (see Figure 8.3 below) as ‘Constrained Land Use’”.

Under Section 3.4 “Sensitivity to Climate Change” of the SFRA, to remove reference to the superseded ~~2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management~~. In the SFRA, to add reference to the Flood Risk Management Climate Change Sectoral Adaptation Plan 2019 prepared under the National Adaptation Framework in the context of future scenarios.

11. Noted. I recommend amending the text in Section 8.4.2 of the Plan as follows:  
“New developments will be required to ensure that access is preserved for the maintenance of ~~the Arterial Drainage Schemes and~~ Drainage Districts and the OPW will be consulted with in the consideration of applications for developments in the vicinity of the ~~OPW Arterial Drainage Schemes District~~ in this regard”.
12. Noted. I recommend amending Policy TCP-13 as follows; “Incorporate Sustainable Urban Drainage Systems (SuDS) and other nature-based solutions in accordance with the ‘Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, 2022’ and any subsequent editions. **On key development sites, specifically the Blundell Masterplan site, integrated and area-based provision of SuDS and green infrastructure would be appropriate in order to avoid reliance on individual site by site solutions. Section 3.5 Sustainable Drainage Systems from the SFRA should be considered in this regard.**”
13. Noted. I recommend that Table 5 in the SFRA be presented in the same manner as Table 6 and to complete the text in the table relating to DMO-106 Flood Risk Assessments, as follows:

Provision
<p><b>CAEP-53</b> It is Council policy to support, in co-operation with the OPW, the implementation of the EU Flood Risk Directive, the Flood Risk Regulations (S.I. No. 122 of 2010) and the ‘The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and Department Circular PI2/2014 or any updated / superseding version.</p>
<p><b>CAEP-54</b> It is Council policy to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standard DMS-106. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded). In Flood Zone C, (See DMS-106 where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets (including Benefitting Lands mapping), emerging CFRAMS mapping (including National Indicative Fluvial mapping), and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective planning applicants and the planning authority in determining planning applications.</p>

**Provision**

It is Council policy to require a Site-specific Flood Risk Assessment (FRA) for all planning applications in areas at risk of flooding (fluvial, pluvial or groundwater), even for developments deemed appropriate in principle to the particular Flood Zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect.

**CAEP-56** It is Council policy to ensure that applications to existing developments in flood vulnerable zones provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following - floor levels, internal layout, flood resilient construction, flood resistant construction, emergency response planning, access and egress during flood events.

**CAEP-57** It is Council policy to work with other bodies and organisations, as appropriate, to help protect critical infrastructure, including water and wastewater, within the county, from risk of flooding. Any potential future variations to the Plan shall consider, as appropriate any new and/or emerging data, including, when available, any relevant information contained in the CFRAMS Flood Risk Management Plans and as recommended in the SFRA for the Plan.

**CAEP-58** It is Council policy to have regard to the findings and recommendations of the current Strategic Flood Risk Assessment prepared as part of the County Development Plan.

**CAEP-59** It is Council policy to consult with the Office of Public Works (OPW) in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible, and the Council will retain a strip of 10 metres on either side of such channel where required, to facilitate access thereto.

**CAEP-60** It is Council policy to consult, where necessary, with Inland Fisheries Ireland, the National Parks and Wildlife Service and other relevant agencies in the construction of flood alleviation measures in Offaly.

**CAEP-61** It is Council policy to work with the OPW and other relevant Departments and agencies to implement the recommendations of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented, and to also work with catchment-based Flood Planning Groups, (including where catchments go beyond the Council's administrative boundary) in the development and implementation of catchment-based strategies for the management of flood risk – including those relating to storage and conveyance.

**CAEP-62** It is Council policy that where resources are available and subject to compliance with the Habitats and Birds Directives, the Council will contribute towards the improvement and / or restoration of the natural flood risk management functions of flood plains.

**CAEP-63** It is Council policy to take account of and incorporate into local planning policy and decision making, including possible future variations to this plan, the recommendations of the Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.

**12.6.1 Constrained Land Uses**

Provision
<p>Flood risk areas in settlement plans are represented by a 'Constrained Land Use' designation. This designation generally limits new development, but will facilitate existing development uses within these areas that may require small scale development such as small extensions. Development proposals within these areas shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), which shall assess the risks of flooding associated with the proposed development.</p> <p>Proposals shall only be considered favourably where it is demonstrated to the satisfaction of the Planning Authority that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities, or increase the risk of flooding to other locations and be in accordance with the proper planning and sustainable development of the area.</p> <p>The nature and design of structural and non-structural flood risk management measures required for development in such areas will also be required to be demonstrated, to ensure that flood hazard and risk will not be increased. Measures proposed shall follow best practice in the management of health and safety for users and residents of the development.</p> <p><b>Land Use Zoning Objective – Constrained Land Uses</b></p> <p>It is an objective of the Council to:</p> <p><b>LUZO-14</b> Facilitate the appropriate management and sustainable use of flood risk areas designated as 'Constrained Land Use' on Settlement Plan zoning maps.</p>
<p><b>13.8.3 Flood Risk Assessments</b></p> <p>The Council will have regard to the Planning System and Flood Risk Management Guidelines for Local Authorities (DEHLG and OPW 2009) when assessing planning applications. The key requirements for the management of development in areas at risk of flooding include:</p> <ul style="list-style-type: none"> <li>• All development proposals within or incorporating areas at moderate to high risk of flooding will require site specific and appropriately detailed Flood Risk Assessments.</li> <li>• All development proposals within or incorporating areas at moderate or high risk of flooding will require the application of the Development Management Justification Test in accordance with the Planning System and Flood Risk Management-Guidelines for Planning Authorities (DEHLG and OPW, 2009).</li> <li>• Any proposal that is considered acceptable in principle shall demonstrate the use of the sequential approach to inform the site layout and design of development. Proposals shall also demonstrate that mitigation and management measures can be put in place and that the development will not increase flood risk elsewhere.</li> </ul>
<p><b>DMS-106 Flood Risk Assessments</b></p> <p>Flood Zones and Appropriate Uses</p> <p>The table below indicates the types of land uses that are appropriate in each of the Flood Zones identified within the Plan area, in accordance with the 2009 Flood Risk Management Guidelines for Planning Authorities and Departmental Circular PL2/2014 (or any updated/superseding legislation or policy guidance).</p> <p>Where developments/land uses are proposed that are considered inappropriate to the Flood Zone, then a Development Management Justification Test and site-specific Flood Risk Assessment will be required in accordance with The Planning System and Flood Risk Management Guidelines 2009 (and as updated).</p>

Provision				
Flood Zones	Overall probability	Planning implications for land uses		
		Highly Vulnerable Development	Less Vulnerable Development	Water Compatible Development
<b>Flood Zone A</b>	<b>Highest</b>	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Appropriate – screen for flood risk
<b>Flood zone B</b>	<b>Moderate</b>	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Inappropriate due to climate change – if proposed then Justification Test and detailed Flood Risk Assessment is required	Appropriate – screen for flood risk
<b>Flood Zone C</b>	<b>Lowest</b>	Appropriate - detailed Flood Risk Assessment may be required	Appropriate - detailed Flood Risk Assessment may be required	Appropriate – screen for flood risk

Note (refer to Flood Risk Management Guidelines 2009 and 'SFRA for the Offaly County Development Plan 2021-2027' for additional detail):

- Highly Vulnerable Development – Houses, schools, hospitals, residential institutions, emergency services, essential infrastructure, etc.
- Less Vulnerable Development – Economic uses (retail, leisure, warehousing, commercial, industrial, non-residential institutions, etc.), land and buildings used for agriculture or forestry, local transport infrastructure, etc.
- Water Compatible Development – Docks, marinas, wharves, water based recreation and tourism (excluding sleeping accommodation), amenity open space, sports and recreation, flood control infrastructure, etc.

#### Site-Specific Flood Risk Assessments

The detail of these site-specific FRAs will depend on the level of risk and scale of development but it is advised that The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG and OPW, 2009) (or any superseding document) and available information from CFRAM Studies, including existing and emerging CFRAMS mapping (including National Indicative Fluvial mapping) and the most up to date CFRAM Programme climate scenario mapping shall be consulted with to this effect. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.

#### Structural and Non-Structural Risk Management Measures in Flood Vulnerable Zones

Applications for development in flood vulnerable zones shall provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following:

##### *Floor Levels*

In areas of limited flood depth, the specification of the threshold and floor levels of new structures shall be raised above expected flood levels to reduce the risk of flood losses to a building, by raising floor heights within the building structure using a suspended floor arrangement or raised internal concrete platforms.

When designing an extension or modification to an existing building, an appropriate flood risk reduction measure shall be specified to ensure the threshold levels into the building are above the design flood level. However, care must also be taken to ensure access for all is provided in compliance with Part M of the Building Regulations.

Where threshold levels cannot be raised to the street for streetscape, conservation or other reasons, the design shall specify a mixing of uses vertically in buildings - with less vulnerable uses located at ground floor level, along with other measures for dealing with residual flood risk.

**Provision***Internal Layout*

Internal layout of internal space shall be designed and specified to reduce the impact of flooding [for example, living accommodation, essential services, storage space for provisions and equipment shall be designed to be located above the predicted flood level]. In addition, designs and specifications shall ensure that, wherever reasonably practicable, the siting of living accommodation (particularly sleeping areas) shall be above flood level.

With the exception of single storey extensions to existing properties, new single storey accommodation shall not be deemed appropriate where predicted flood levels are above design floor levels. In all cases, specifications for safe access, refuge and evacuation shall be incorporated into the design of the development.

*Flood-Resistant Construction*

Developments in flood vulnerable zones shall specify the use of flood resistant construction aimed at preventing water from entering buildings – to mitigate the damage floodwater caused to buildings.

Developments shall specify the use of flood resistant construction prepared using specialist technical input to the design and specification of the external building envelope – with measures to resist hydrostatic pressure (commonly referred to as “tanking”) specified for the outside of the building fabric.

The design of the flood resistant construction shall specify the need to protect the main entry points for floodwater into buildings - including doors and windows (including gaps in sealant around frames), vents, air-bricks and gaps around conduits or pipes passing through external building fabric.

The design of the flood resistant construction shall also specify the need to protect against flood water entry through sanitary appliances as a result of backflow through the drainage system.

*Flood-Resilient Construction*

Developments in flood vulnerable zones that are at risk of occasional inundation shall incorporate design and specification for flood resilient construction which accepts that floodwater will enter buildings and provides for this in the design and specification of internal building services and finishes. These measures limit damage caused by floodwater and allow relatively quick recovery.

This can be achieved by specifying wall and floor materials such as ceramic tiling that can be cleaned and dried relatively easily, provided that the substrate materials (for example, blockwork) are also resilient. Electrics, appliances and kitchen fittings shall also be specified to be raised above floor level, and one-way valves shall be incorporated into drainage pipes.

*Emergency Response Planning*

In addition to considering physical design issues for developments in flood vulnerable zones, the developer shall specify that the planning of new development also takes account of the need for effective emergency response planning for flood events in areas of new development.

Applications for developments in flood vulnerable zones shall provide details that the following measures will be put in place and maintained:

- Provision of flood warnings, evacuation plans and ensuring public awareness of flood risks to people where they live and work;
- Coordination of responses and discussion with relevant emergency services i.e. Local Authorities, Fire and Rescue, Civil Defence and An Garda Síochána through the SFRA; and
- Awareness of risks and evacuation procedures and the need for family flood plans.

**Provision***Access and Egress During Flood Events*

Applications for developments in flood vulnerable zones shall include details of arrangements for access and egress during flood events. Such details shall specify that:

- flood escape routes have been kept to publicly accessible land;
- such routes will have signage and other flood awareness measures in place, to inform local communities what to do in case of flooding; and
- this information will be provided in a welcome pack to new occupants.

*Further Information*

Further and more detailed guidance and advice can be found at <http://www.flooding.ie> and in the Building Regulations.

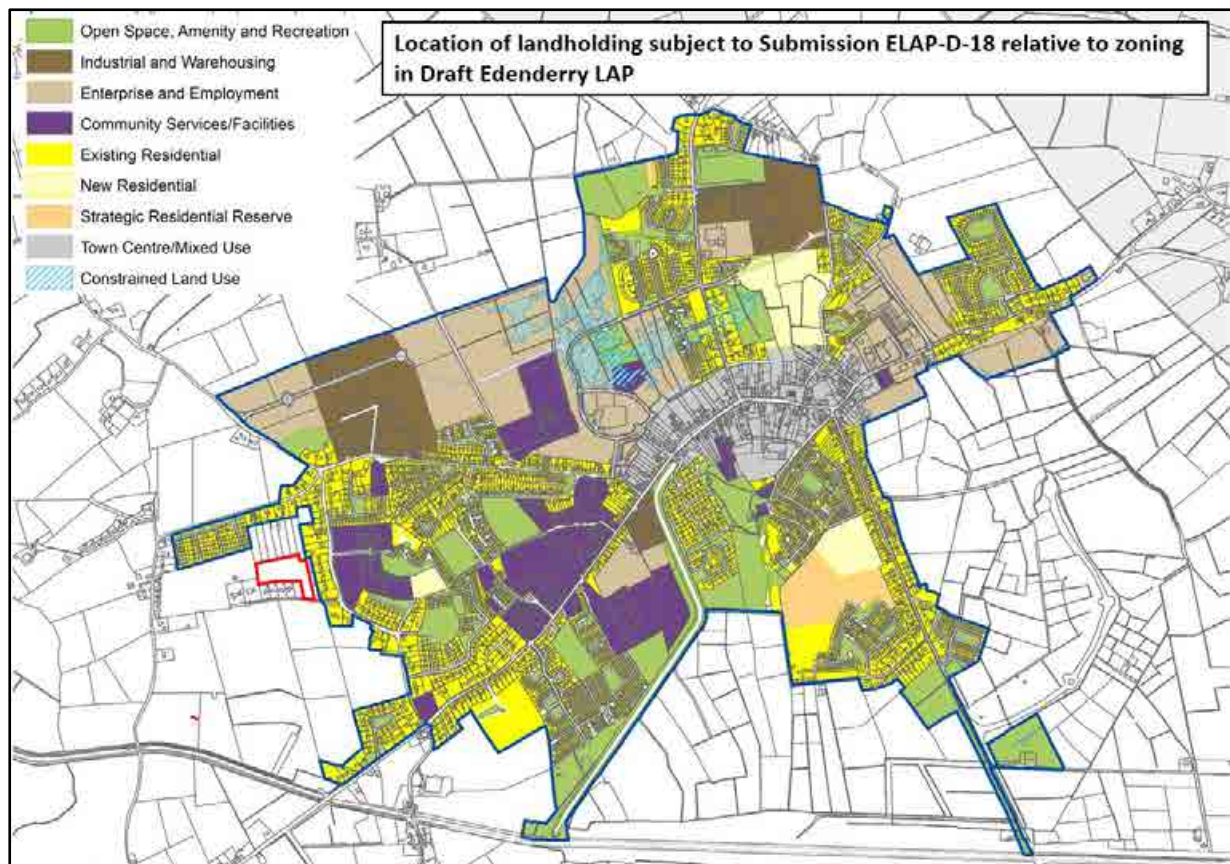
**Ref: ELAP-D-18****Person / Body:**

**David Mulcahy Planning Consultant on behalf of Mr. David Foran**

**Summary of submissions / observations:**

This submission requests that this site (shown outlined in red on map below) be designated for 'Serviced Sites' as;

- The lands in question are owned entirely by Mr. Foran in a single landholding;
- The lands are understood to have been previously zoned for residential development in 2006;
- The site is greenfield in nature and has road frontage onto a road to the south of the site (cul-de-sac);
- The lands are serviceable (subject to the planned upgrade of the Edenderry WWTP);
- The lands are surrounded by existing housing (infill site) and close to a number of schools;
- The cul-de-sac road connects with the R441 which provides pedestrian, cycle and car access into the town;
- The Draft Edenderry Local Area Plan 2023-29 excludes these lands from the settlement boundary and they are effectively deemed agricultural;
- There are no known built or natural heritage constraints associated with the land or flood risk;
- Serviced sites will provide a viable alternative to persons who meet local needs criteria but cannot obtain planning permission for a dwelling.

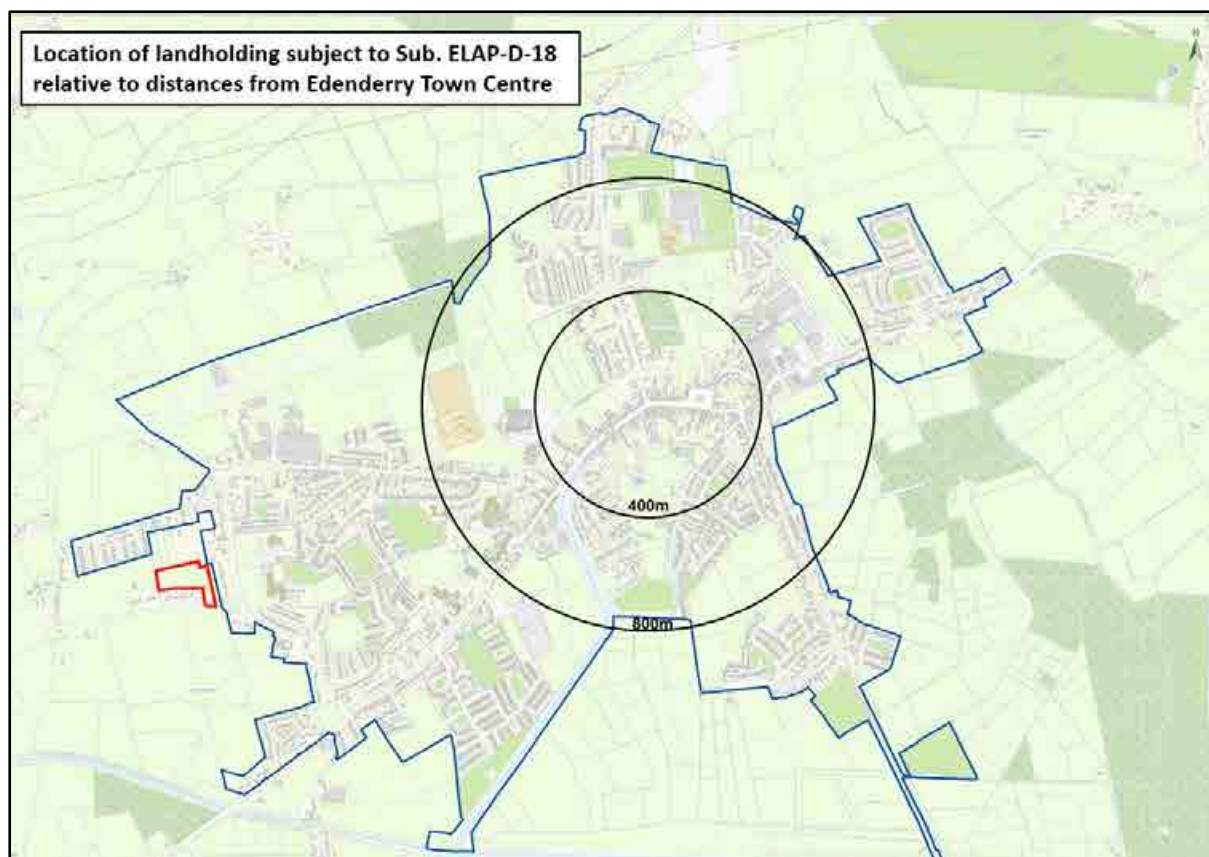


#### CE Response:

#### Zoning Request:

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reason;

1. In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that '*From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...*'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that '*Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.*' It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Development Plan.



The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 1.74 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area

Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

2. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

#### Planning and Infrastructural Assessment:

I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre
- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 45' in proposed revised mapping in the Planning and Infrastructural Assessment.

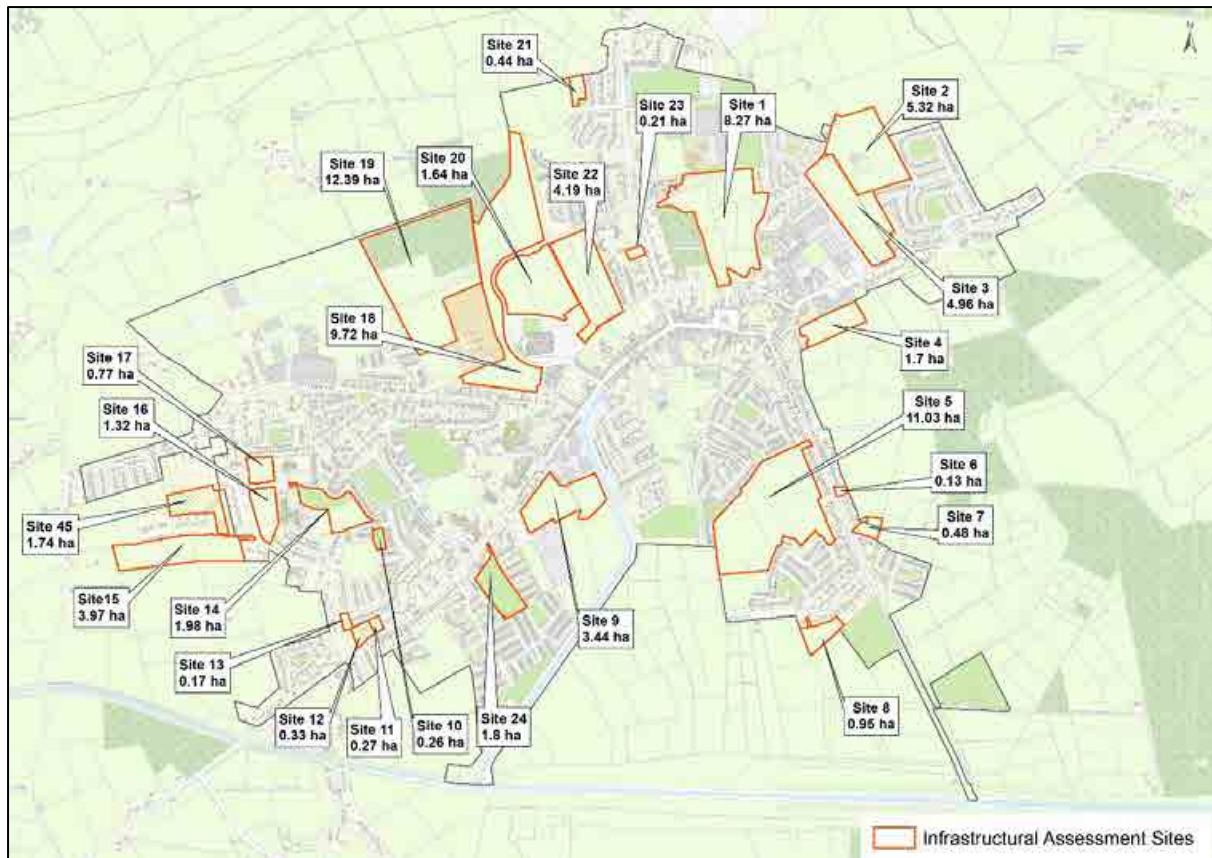


Table 10.1 List of Sites Assessed

Site No.	Site Name	Site Area	Site Description
45	Monasteroris	1.74 ha.	Vacant 'L' shaped greenfield parcel of land located outside and to the west of the town. The site is bordered to the north by the Manor housing development, to the west by one off houses along Local Tertiary Road, L-10271-2. The landholding is accessed from a cul de sac laneway to the east which serves a number of individual houses. The landholding is relatively flat.

Table 10.2: Site Appraisals

Site No.	Criteria	Recommendation	Justification
45	Promotes compact growth	Do not zone.	This site is peripheral to the town, located over 1200 metres from the town centre. Notwithstanding the existence of schools in the area, zoning this site for residential development would constitute urban sprawl, increase car
	Promotes sustainable mobility		

Site No.	Criteria	Recommendation	Justification
	Availability of infrastructure & Services		dependency and mitigate against the promotion of compact growth.
	Physical suitability and accessibility		There are other lands more suitable for residential development identified in the Plan Area.

**Ref: ELAP-D-20****Person / Body:****Tom Philips and Associates on behalf of Gambara Ltd.****Summary of submissions / observations:**

This submission relates to a land parcel at Edenderry Business Campus, located off the R441 with access through the business park, located to the north west of Edenderry Town Centre.

1. The submission requests the rezoning of the site from 'Enterprise and Employment' as identified in the Draft LAP, to 'New Residential' as the submission puts forward that the site is ideally placed to support compact growth objectives in the NPF and RSES, being c.1.5km from the town centre. The submission states no evidence is provided in the LAP that the subject site was assessed to support the delivery of proposed housing targets.
2. The submission states that an increase in housing targets is required, above what is set out in the National Planning Framework, in recognition of Ireland's rapidly growing population. Delivery of housing units within the town during the lifetime of the new LAP is of critical importance to ensure appropriate supply of accommodation is available.
3. The Core Strategy of the Offaly County Development Plan 2021-2027 estimates that the population of Edenderry will increase during the lifetime of the Development Plan, therefore amendments to the land use zoning objectives in the new Edenderry LAP 2023-2029 is required to meet demand. The submission states c. 16ha of undeveloped lands are zoned for residential purposes in the current LAP (2017-2023), which allows for c. 128 no residential units and a population growth of 358 people (2.79 persons per household). 2016 CSO population is noted as 7,001 persons with preliminary figures for 2022 of 7,502 persons, which is given as a 7.1% increase in the submission.
4. The strategic location of the subject site in proximity to the R402, R441 and the future Inner Relief Road provides connectivity to the M4 motorway. It is submitted that the approved Inner Relief Road will significantly enhance the accessibility of the site. The site is also identified in the submission as being close to existing schools in the vicinity.
5. The land is fully serviced by existing infrastructure (foul, drainage and water supply).
6. An indicative masterplan accompanies the submission showing a proposed residential layout of the subject land with adjoining mixed uses on lands to the north including a hotel, crèche and offices.
7. In conclusion, the submission states the subject lands to the west of Edenderry are a logical extension of the existing town and support compact growth.

**CE Response:**

1. Having regard to the 'Enterprise and Employment' zoning of the land, it is considered that there are other lands within the town that are more appropriately located for 'New Residential' zonings, closer to the town centre that support compact growth in line with the principles of National Planning Framework (National Strategic Outcome 1) and the Regional Spatial and Economic Strategy (Regional Strategic Outcome 2) that will deliver the Core Strategy housing allocation for the town over the lifetime of the development plan.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'* *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'*

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned approximately 11.75 hectares of land 'New Residential'. This submission proposes to unacceptably exceed the allocation by 2.96 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis

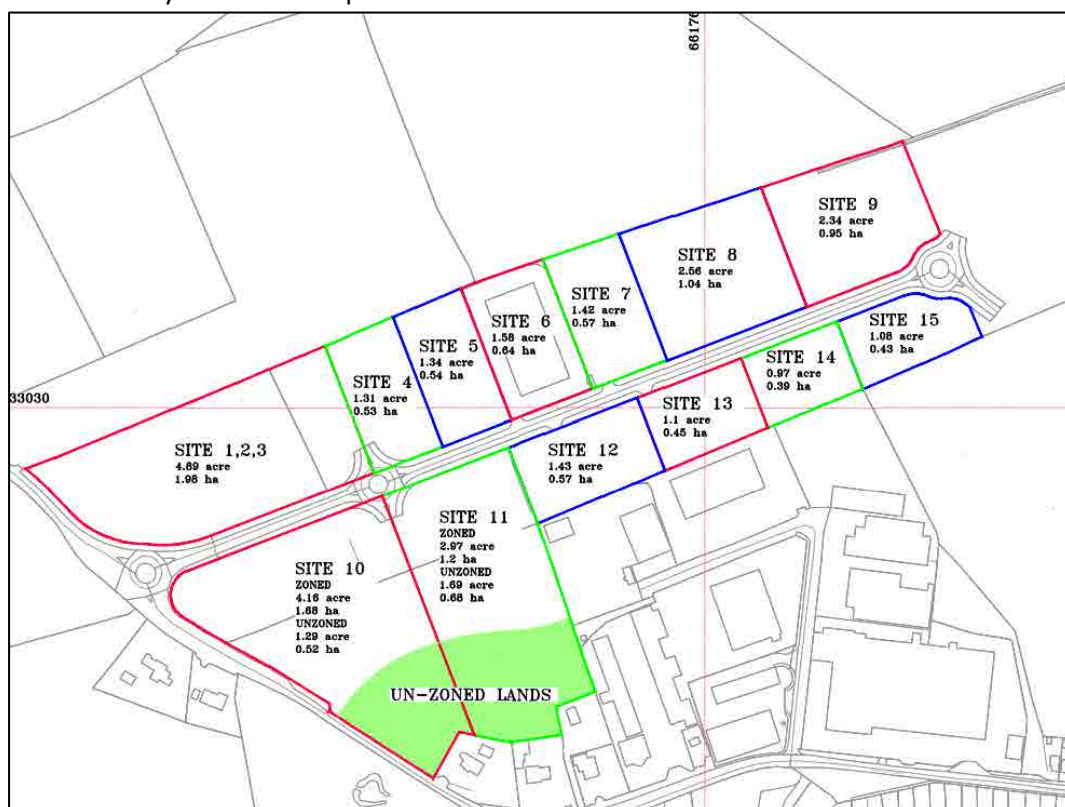
with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

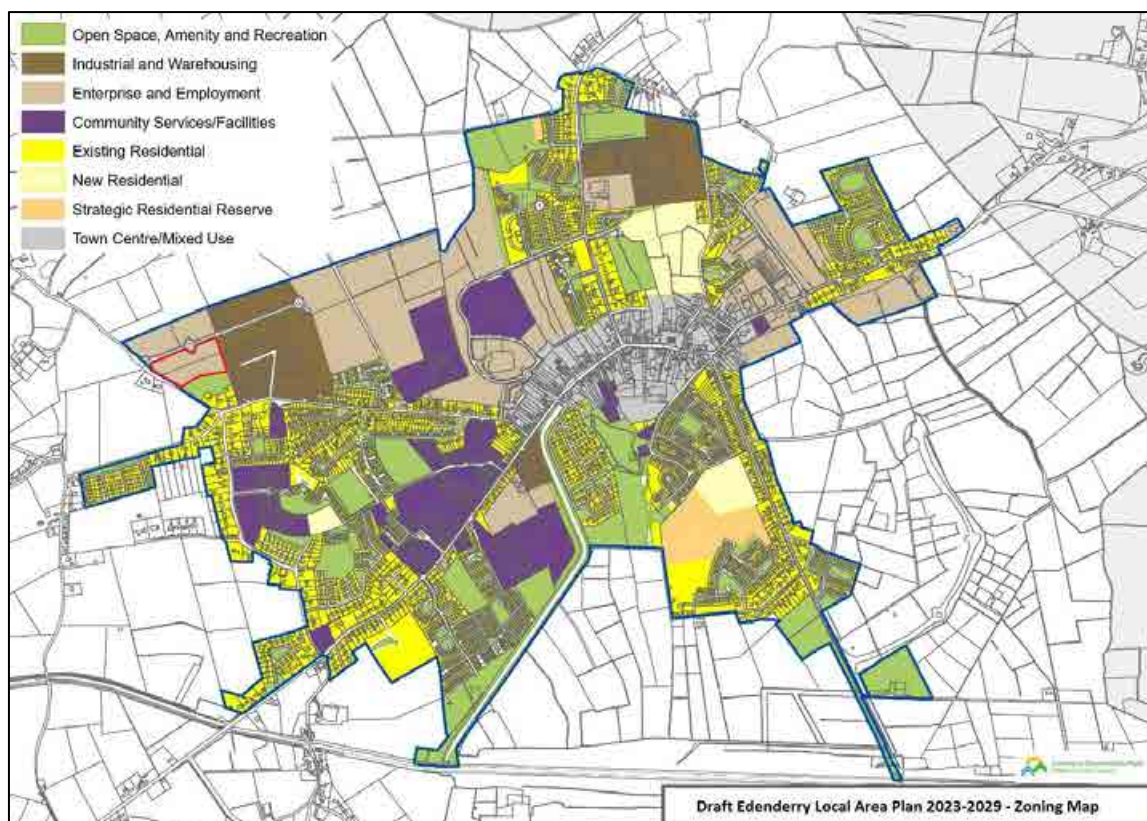
Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs:resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

In addition Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

Accordingly, I do not recommend amending the zoning of the subject site and to retain the 'Enterprise and Employment' zoning in line with the strategic function of the site as part of the Edenderry Business Campus as illustrated below.



**Breakdown of Sites with Edenderry Business Campus – Subject land = Sites 10 and 11**  
(Source: [www.edenderrybusinesscampus.com](http://www.edenderrybusinesscampus.com))



### Subject Site outlined in red

I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend Figure 10.1 and Figure 10.2 and Table 10.1 and Table 10.2 to make reference to the subject site as follows;

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
37	Monasteroris	2.96 ha	Grazing agricultural land. Flat land with industrial/warehousing land to the east and vacant 'Enterprise and Employment' Land to the north and north east.

**Table 10.2 Site Appraisals**

Site No.	Criteria	Recommendation	Justification
37	Promotes compact growth	'Enterprise and Employment'	There are other lands more suitable for residential development that support compact growth in the Plan Area. Limited potential to incorporate residential into this planned Edenderry Business
	Promotes sustainable mobility		

	Availability of infrastructure & Services		Campus with existing Industrial Warehousing to the east.
	Physical suitability		

Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment

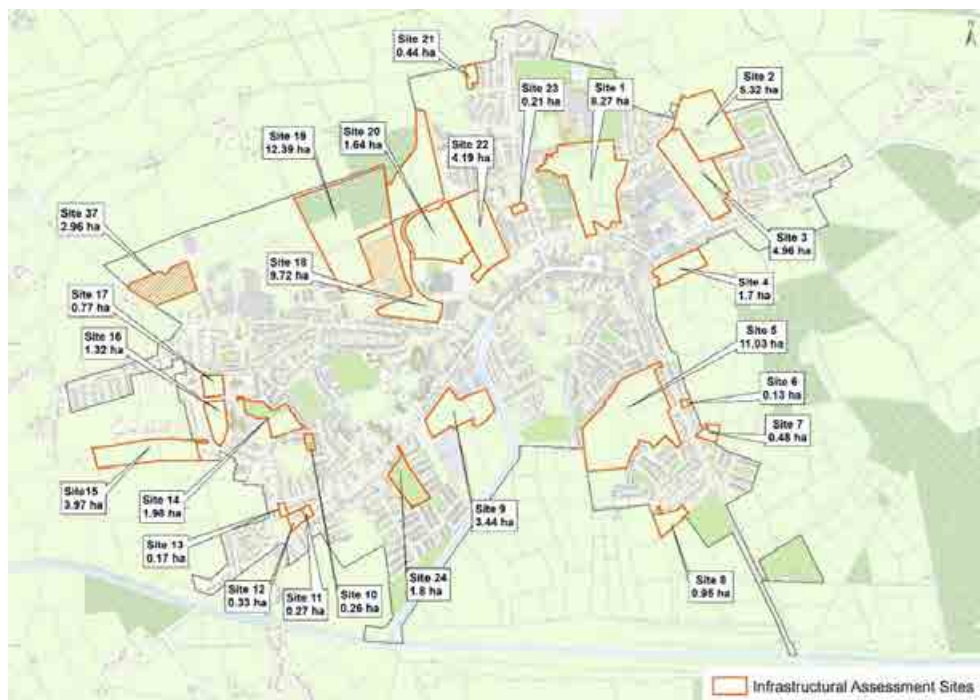
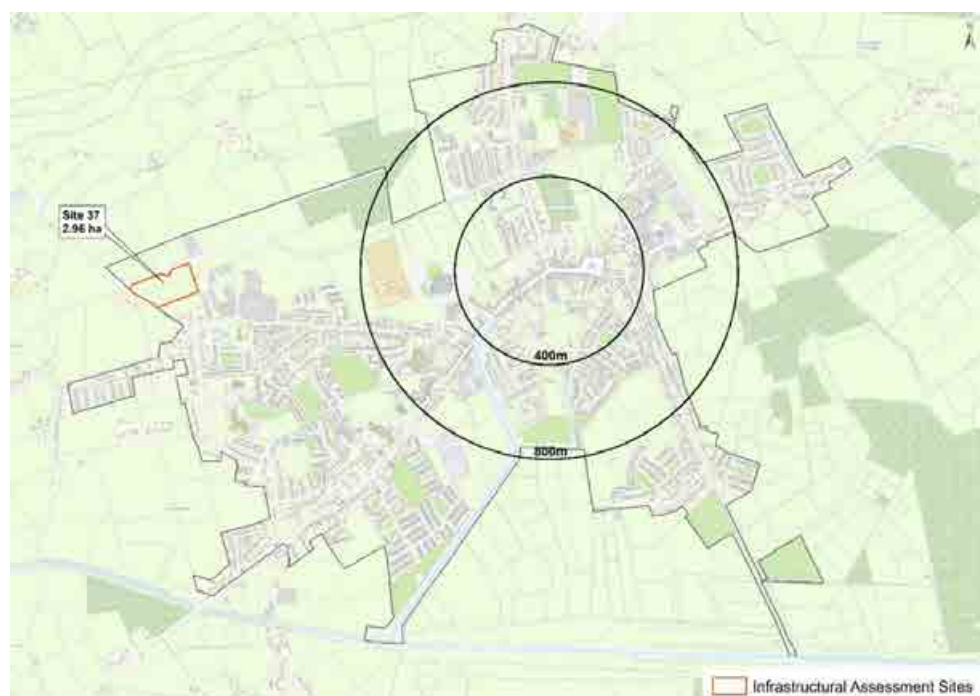
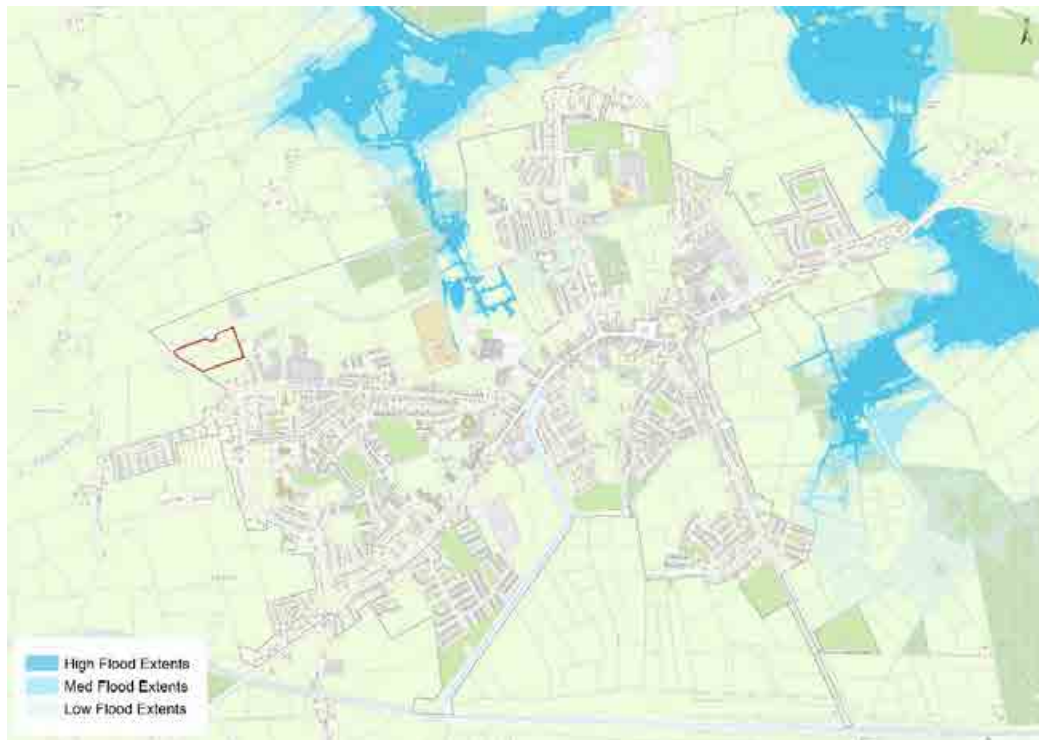


Figure 10.2 Distance of sites from Edenderry Town Centre



The subject site is not in an area impacted by flooding as illustrated in the figure below.

**Figure 10.3 Location of Site in Relation to Flood Extents**



2. The 'New Residential' land use zoning proposed within the Draft LAP can provide an average density of 30 dwellings per hectare on approximately 11.65 hectares of land. This could potentially provide an approximate additional 350 dwellings during the lifetime of the LAP, which is consistent with projected population demand in the Core Strategy of the County Development Plan 2021-2027 and the housing supply target of 321 units up to 2027.

The 2016 Census of population provided a figure of 7,359 persons in Edenderry. Preliminary figures for 2022 give an approximate population of 7,502 for Edenderry which equates to an average annual increase of 23.8 people per annum over the 2016-2022 period. A continuation of this average trend up to 2029 would give an additional population of 166no. persons for a total of 7,668no. persons within the town. The amount of zoned land is therefore considered more than adequate to address currently projected population growth within the plan period.

3. The population figure of 7,001 from the 2016 Census as put forward in the submission are considered to be incorrect and at odds with recorded population figures of 7,359 persons in Edenderry. As referred to in sections 1 and 2 above, adequate land is zoned to provide for population growth in the plan period. I therefore do not recommend any changes to the Draft Plan on foot of this point of the submission.
4. The subject site is considered to be strategically located with strong transport links that will support the intended function of the lands for employment generating uses that have strong connectivity to the town and wider region. The location of the site over 1.5km from the town centre is not considered suitable for residential land use and is more suited to strengthening the Edenderry Business Campus.

5. While the subject site is well served or can be served by existing infrastructure such as water supply, stormwater, footpaths, lighting etc. There are other capacity constraints within the town of Edenderry, specifically in relation to the upgrade of the Edenderry Waste Water treatment plant. This places further constraints on the amount of residential land that can be zoned during the lifetime of this Local Area Plan and as detailed, adequate residential land is zoned in more appropriate locations within the town.
6. See my response no. 1 above which addresses the principle of the proposal.
7. As detailed in previous sections there is an adequate quantum of land zoned for 'New Residential' uses in the lifetime of this plan to support compact growth and to be consistent with future population projections for the town of Edenderry. I therefore recommend the 'Enterprise and Employment' zoning is maintained at the subject site in the lifetime of the Edenderry Local Area Plan 2023-2029.

**Ref: ELAP-D-21**

**Person / Body:**

**Joe Bonner Town Planning Consultant on behalf of Donal and Kryan Foran.**

**Summary of submissions / observations:**

This submission relates to a land parcel to the west of Edenderry Town, located off the R441, to the north of the Grand Canal and extends to 45.49 hectares in total (with a site of 5.95ha the subject of the submission).

1. The submission claims the amount of zoned land in the Draft Edenderry LAP (c.11.65ha) is not sufficient to support housing demand that currently exists and will exist up to 2050.
2. An urgent review of the National Planning Framework along with associated population projections is needed to reflect Ireland's growing population associated with natural growth and in-migration due to international protection applicants.
3. The current zoning of the subject site is mainly white lands with a c.4.15ha area of land zoned 'Low Density Residential' in the Edenderry Local Area Plan 2017-2023.
4. The de-zoning of the subject site is one of only two sites in Edenderry de-zoned in the draft plan when compared with the current LAP. This is contrary to ministerial guidelines stating zoned and serviced land should not be de-zoned.
5. At a minimum, the low-density residential zoning should be re-instated in accordance with ministerial direction that states no de-zoning of zoned or serviced land should be undertaken. C.21ha of 'New Residential' zoned land is required to allow for future population and the provision of choice. The currently zoned 'Low Density Residential' site within the subject landholding is proposed to be swapped to a more appropriate location to the south of the landholding that has road frontage and is contiguous to existing residential to the north, south and east.

**CE Response:**

1. The Local Authority is bound by the population figures provided in the National Planning Framework, Regional Spatial and Economic Strategy for the Eastern and Midlands Region and the Offaly County Development Plan 2021-2027. Until such time as there is appropriate guidelines and official revisions to the current population figures, it would not be appropriate for the Edenderry Local Area Plan 2023-2029 to include upwardly revised numbers within a statutory document. It is considered that there are other lands within the town that are more appropriately located for 'New Residential' zonings, closer to the town centre that support compact growth in line with the principles of National Planning Framework (National Strategic Outcome 1) and the Regional Spatial and Economic Strategy (Regional Strategic Outcome 2) that will deliver the Core Strategy housing allocation for the town over the lifetime of the development plan.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'* *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'*

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned approximately 11.75 hectares of land 'New Residential'. This submission proposes to unacceptably exceed the allocation by 5.95 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area

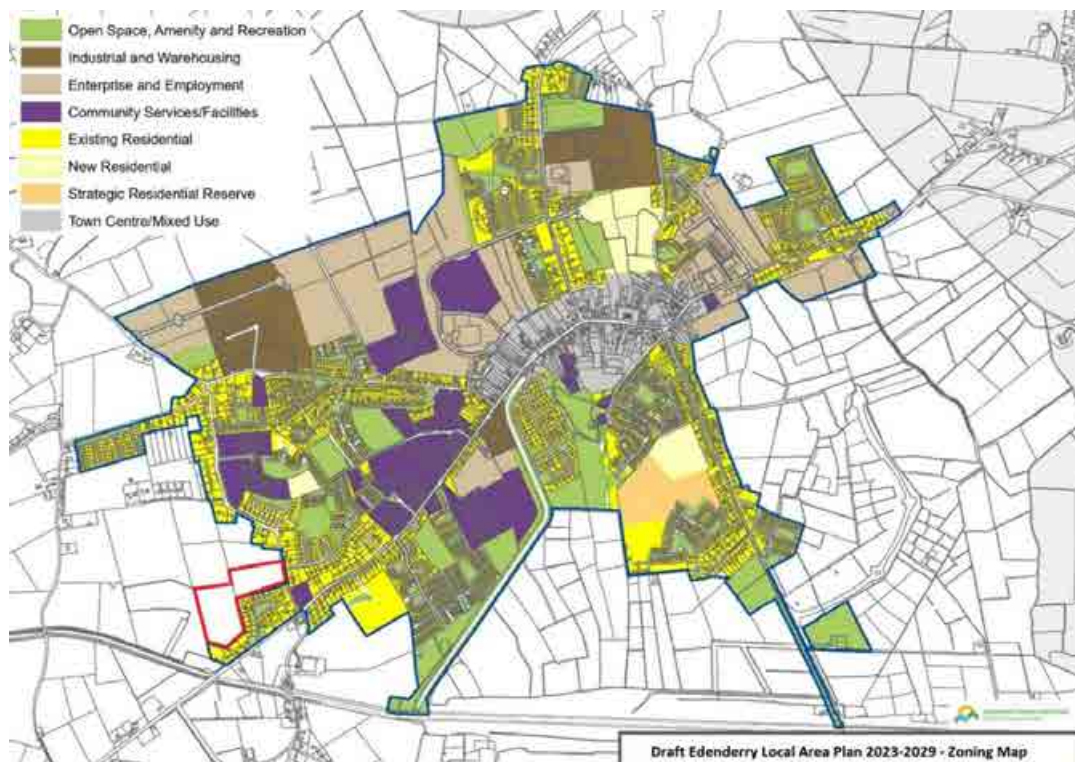
Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs:resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

In addition Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'



**Subject Site outlined in red**

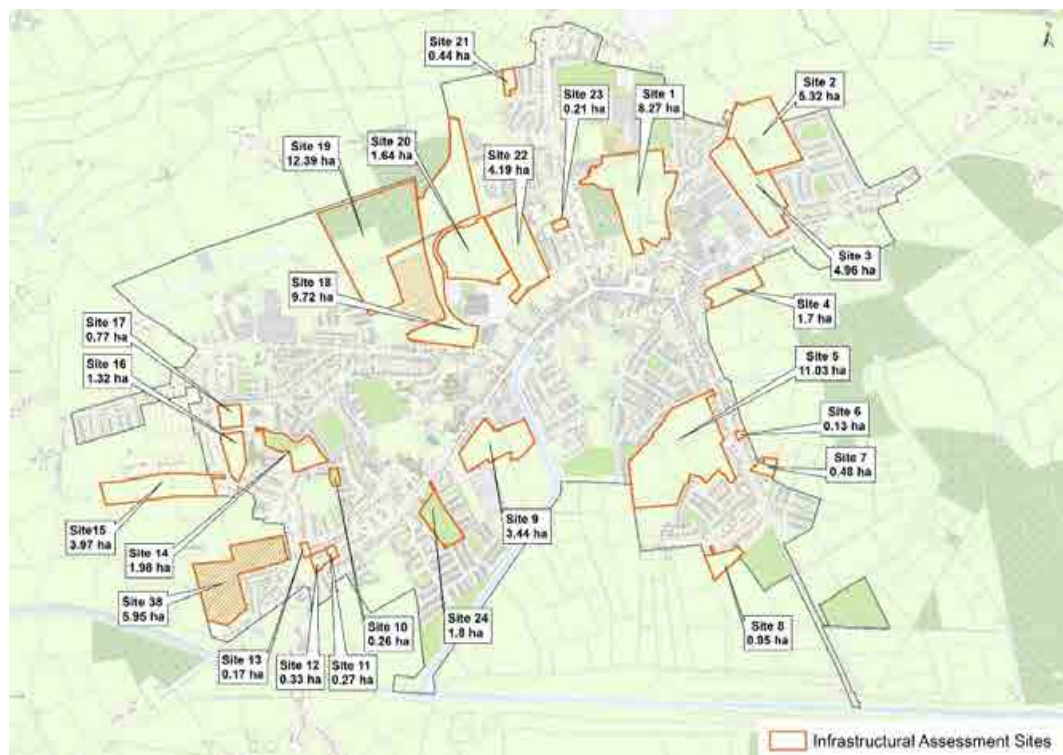
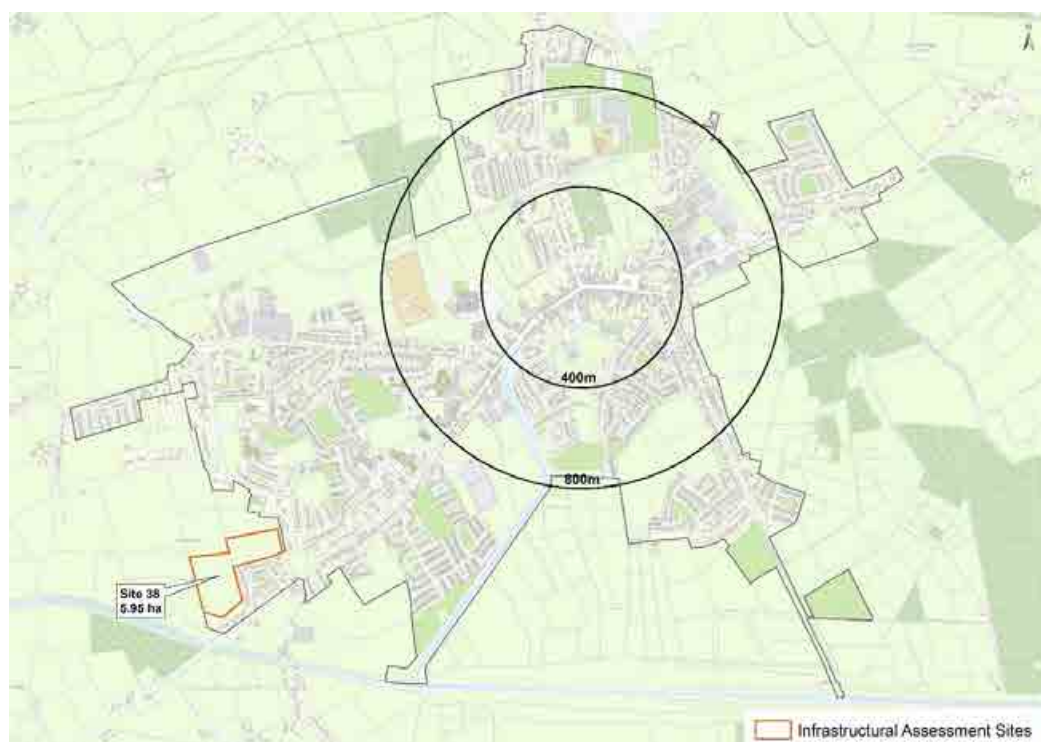
I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend Figure 10.1 and Figure 10.2 and Table 10.1 and Table 10.2 to make reference to the subject site as follows;

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
38	Rathmore	5.95 ha	Grazing agricultural land. Flat land with residential land to the south and east and agricultural/grazing land to the north.

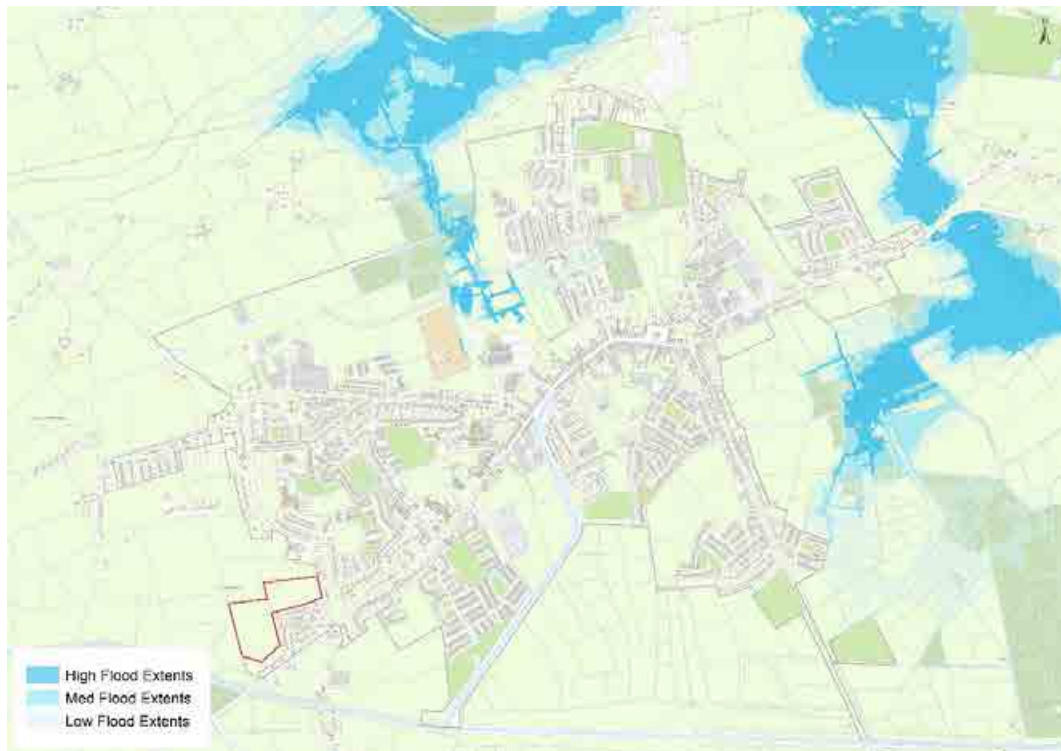
**Table 10.2 Site Appraisals**

Site No.	Criteria	Recommendation	Justification
38	Promotes compact growth	Do not zone	There are other lands more suitable for residential development that support compact growth in the Plan Area. The subject site is removed from Edenderry Town Centre and is at the periphery of the existing built up area.
	Promotes sustainable mobility		
	Availability of infrastructure & Services		
	Physical suitability		

**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment****Figure 10.2 Distance of sites from Edenderry Town Centre**

The subject site is not within an area impacted by flooding as illustrated in the figure below.

**Figure 10.3 Location of Site in Relation to Flood Extents**



2. The 'New Residential' land use zoning proposed within the Draft LAP can provide an average density of 30 dwellings per hectare on approximately 11.65 hectares of land. This could potentially provide an additional 350 dwellings during the lifetime of the LAP, which is consistent with projected population demand provided in the Core Strategy of the County Development Plan 2021-2027 and the housing supply target of 321 up to 2027.

The 2016 Census of population provided a figure of 7,359 persons in Edenderry. Preliminary figures for 2022 give an approximate population of 7,502 for Edenderry which equates to an average annual increase of 23.8 people per annum over the 2016-2022 period. A continuation of this average trend up to 2029 would give an additional population of 166 for a total of 7,668 persons. The amount of zoned land is considered more than adequate to address projected population growth within the plan period.

While a review of population figures may occur in the future, no such review information is currently available to allow any revisions to core strategy figures. I therefore recommend no further alterations to the Draft LAP on foot of this point of the submission.

3. The 'Low Density Residential' land use zoning is no longer in use within Offaly Development Plan documents and it is therefore not appropriate to provide this zoning within the development boundary of Edenderry LAP 2023-2029. The 'New Residential' zoning for the Draft Edenderry LAP covers a range of densities and is considered more than appropriate to provide for the Core Strategy allocation for the town. Accordingly, I do not recommend amending the zoning of the subject site.

4. The contents of 'Development Plans – Guidelines for Planning Authorities' is noted, specifically section 4.4.1 of the document that states:

*"It is a policy and objective of these Guidelines that zoned housing land in an existing development plan that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning".*

As set out in previous sections, adequate 'New Residential' zoned land is provided in the Draft LAP, and when taken in conjunction with the potential residential supply that could be provided within 'Town Centre/Mixed Use' lands it is not considered appropriate to provide additional residential zoned land on the periphery of the built up area and which is considered contrary to compact growth objectives in higher order strategic plans.

Section 10(8) of the Planning and Development Act 2000 states the following:

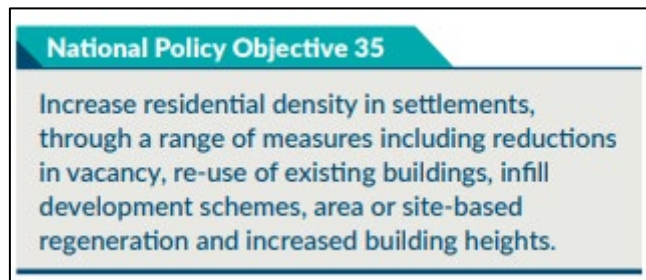
*"(8) There shall be no presumption in law that any land zoned in a particular development plan (including a development plan that has been varied) shall remain so zoned in any subsequent development plan."*

There are considered overriding objectives contained in National and Regional policy documents that justify the removal of low density land use zoning in peripheral areas that do not support compact development. The following relevant text is set out on page 93 of the NPF:

Historically, low-density housing development has been a feature of Ireland's housing landscape in cities, towns, villages and the countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas.

**Well designed and located higher density housing will assist:**

- **Fast-growing urban areas to achieve much needed scale;**
- **Medium-sized urban areas to find a route to quality in a new competitive framework;**
- **All urban areas to increase vibrancy and vitality;**
- **Increased efficiency and sustainability in the use of energy and public infrastructure**



I therefore do not recommend any alterations to the draft plan on foot of this point of the submission.

5. As stated under point 3 above The 'Low Density Residential' land use zoning is no longer in use within Offaly Development Plan documents and it is therefore not appropriate to zone the subject site for this land use. The subject land has remained undeveloped despite the previous low density residential land use zoning. Accordingly, I do not recommend amending the zoning of the subject site.

**Ref: ELAP-D-22**

**Person / Body: McGill Planning on behalf of Newlyn Homes Ltd**

**Summary of submissions / observations:**

This submission states that in the southern end of this landholding, adjacent Tyrrell's Lane, McGill's client was granted permission in 2020 for 84 dwellings and their client has been building this scheme since 2022 and completion is expected before end of next year (2024).

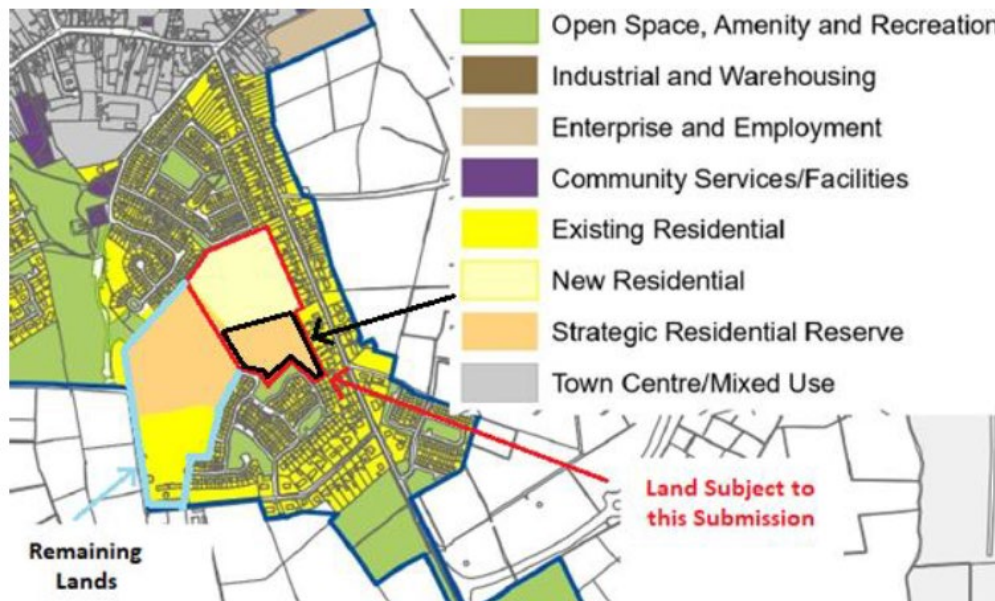
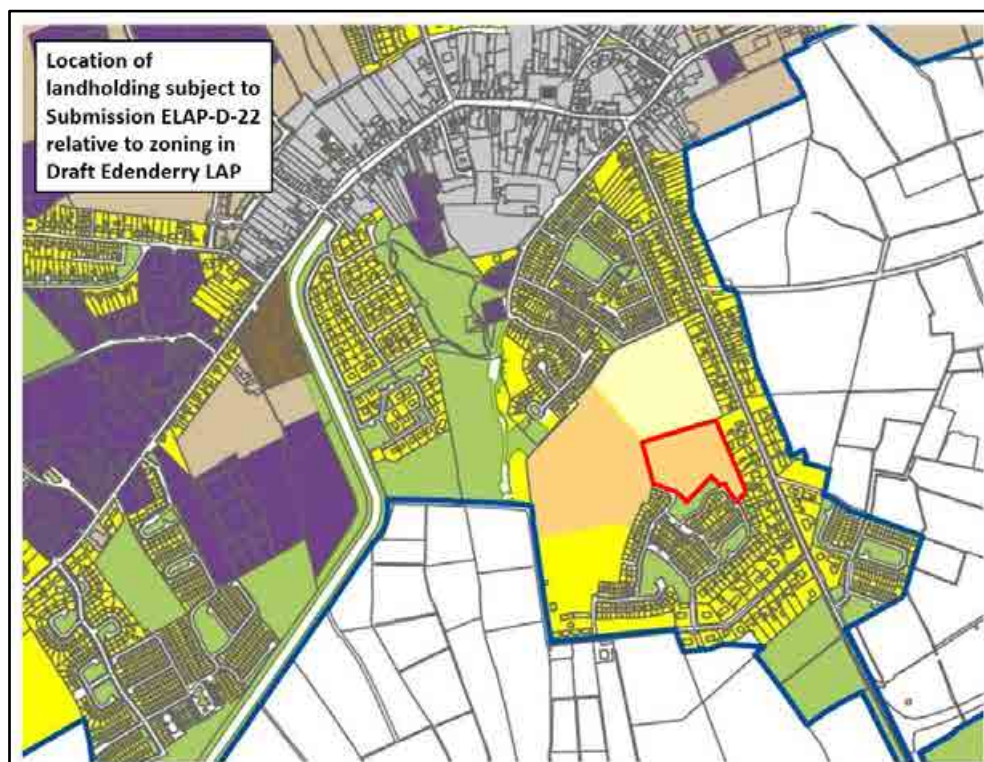


Figure 5: Extract of Draft LAP Zoning Map and Indicating the additional portion of Newlyn Homes Landholding proposed for New Residential (outlined in black)



It is requested that the subject parcel of land outlined in black on map above be zoned 'New Residential' as;

- All of the landholding is appraised positively in Chapter 10 of the Draft LAP in respect of infrastructural requirements and planning assessment criteria including compact growth, sustainable mobility, the availability of infrastructure and services, and physical suitability and accessibility;

- To limit the 'New Residential' zoning on their clients landholding to that contained in the Draft Plan provides their client with insufficient land to develop during the life of the Plan who may be forced to relocate operations to alternative towns in Leinster with potential knock-on implications for the delivery and completion of the remaining Tyrell's Brook lands;
- A growing national consensus has emerged which considers the population targets assigned to each county via the National Planning Framework Implementation Roadmap and the Regional Spatial and Economic Strategies are based on significantly under-estimated population growth projections for the coming decades. It states that NPF 2040 was adopted based on ESRI population projections of an additional 1 million population in the country by 2040, however, subsequent projections are now suggesting that the 1 million target will be reached by 2030, 10 years earlier;
- The distribution of 'New Residential' zoning is weighted towards one single landholding to the north of the town centre, which has no extant permissions, and it is considered unreasonable and unsustainable that all of the landholding would be prescribed 80% of the residential zoning in the Draft LAP. It is proposed that the Planning Authority could consider zoning a portion of that landholding as Strategic Residential Reserve, similar to what has been proposed on their clients' landholding.
- Extending the 'New Residential' zoning as proposed would significantly increase connectivity and permeability between residential estates at the southern extent of the town to the town centre and other services, reducing the distance needed to travel on foot to these areas.

#### CE Response:

#### Zoning Request:

I recommend no amendment to the zoning of the Draft Edenderry LAP for the following reasons:

1. The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned 11.75 hectares of land new residential. This submission proposes to unacceptably exceed the allocation by 2.04 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs: resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

2. Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

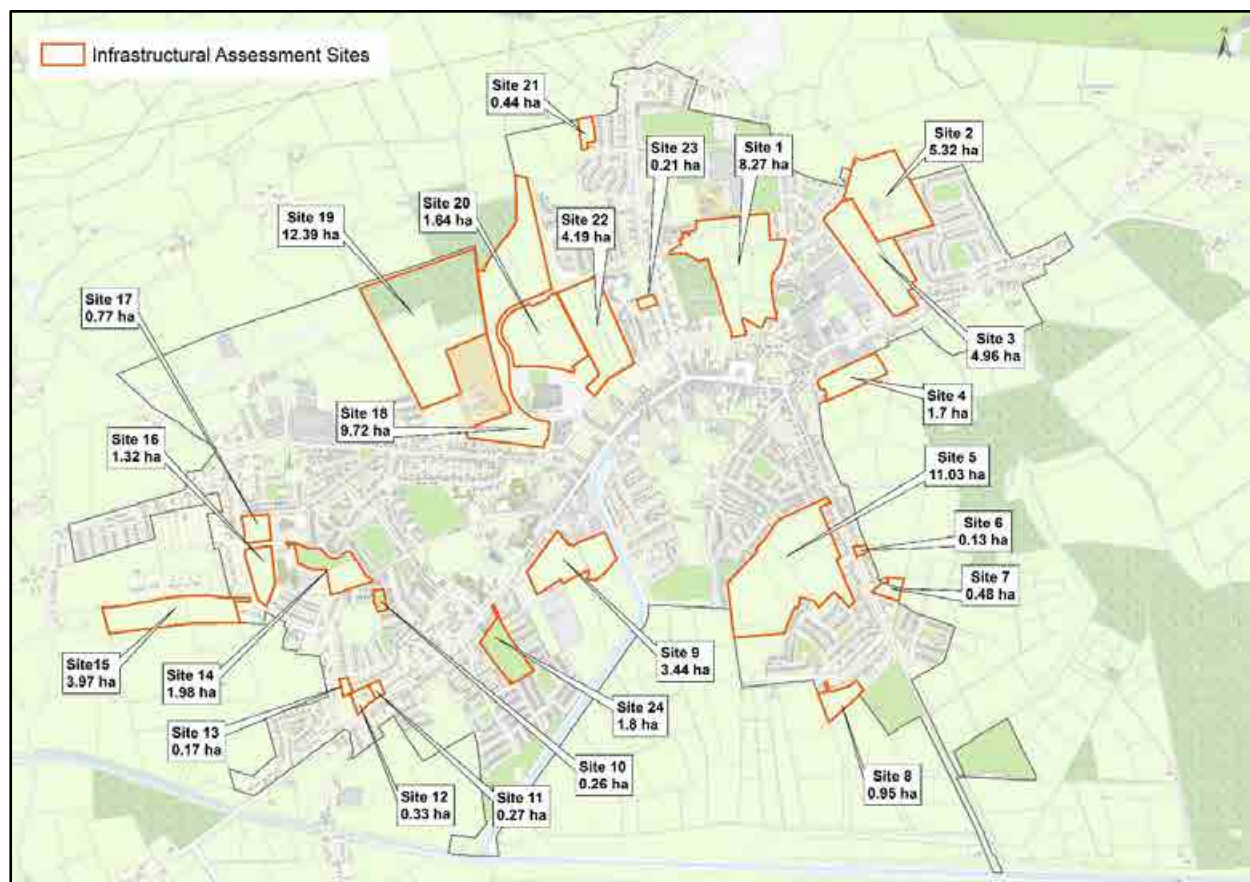
#### Planning and Infrastructural Assessment:

It is noted that this site was assessed already in Chapter 10 Planning and Infrastructure Assessment from the Draft LAP in Table 10.2 as outlined below. Note that subject site forms part of Site No. 5 in the Planning and Infrastructural Assessment in Chapter 10 of the Draft Plan.

**Table 10.2: Site Appraisals**

Site No.	Criteria	Recommendation	Justification
5	Promotes compact growth	Zone a combination of 'New Residential' and 'Strategic Residential Reserve.'	Having regard to part of this site being located within convenient walking distance of the town centre in addition to the established residential character of the area, it is considered reasonable to zone the field in the north eastern site of
	Promotes sustainable mobility		

Site No.	Criteria	Recommendation	Justification
	Availability of infrastructure & services		the landholding for residential development.
	Physical suitability and accessibility		The remainder of the landholding can be considered in subsequent Local Area Plans.



**Ref: ELAP-D-24****Person / Body:****Christopher Dunne****Summary of submissions / observations:**

This submission relates to a land parcel of approximately 9.45 ha to the north west of Edenderry Town Centre on land currently zoned 'Enterprise and Employment'. The submission seeks the rezoning of the site to 'New Residential'.

**CE Response:**

The Local Authority is bound by the population figures provided in the National Planning Framework, Regional Spatial and Economic Strategy for the Eastern and Midlands Region and the Offaly County Development Plan 2021-2027. Having regard to the 'Enterprise and Employment' zoning of the land, it is considered that there are other lands within the town that are more appropriately located for 'New Residential' zonings, closer to the town centre that support compact growth in line with the principles of National Planning Framework (National Strategic Outcome 1) and the Regional Spatial and Economic Strategy (Regional Strategic Outcome 2) that will deliver the Core Strategy housing allocation for the town over the lifetime of the development plan.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'*

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned approximately 11.75 hectares of land 'New Residential'. This submission proposes to unacceptably exceed the allocation by 9.45 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

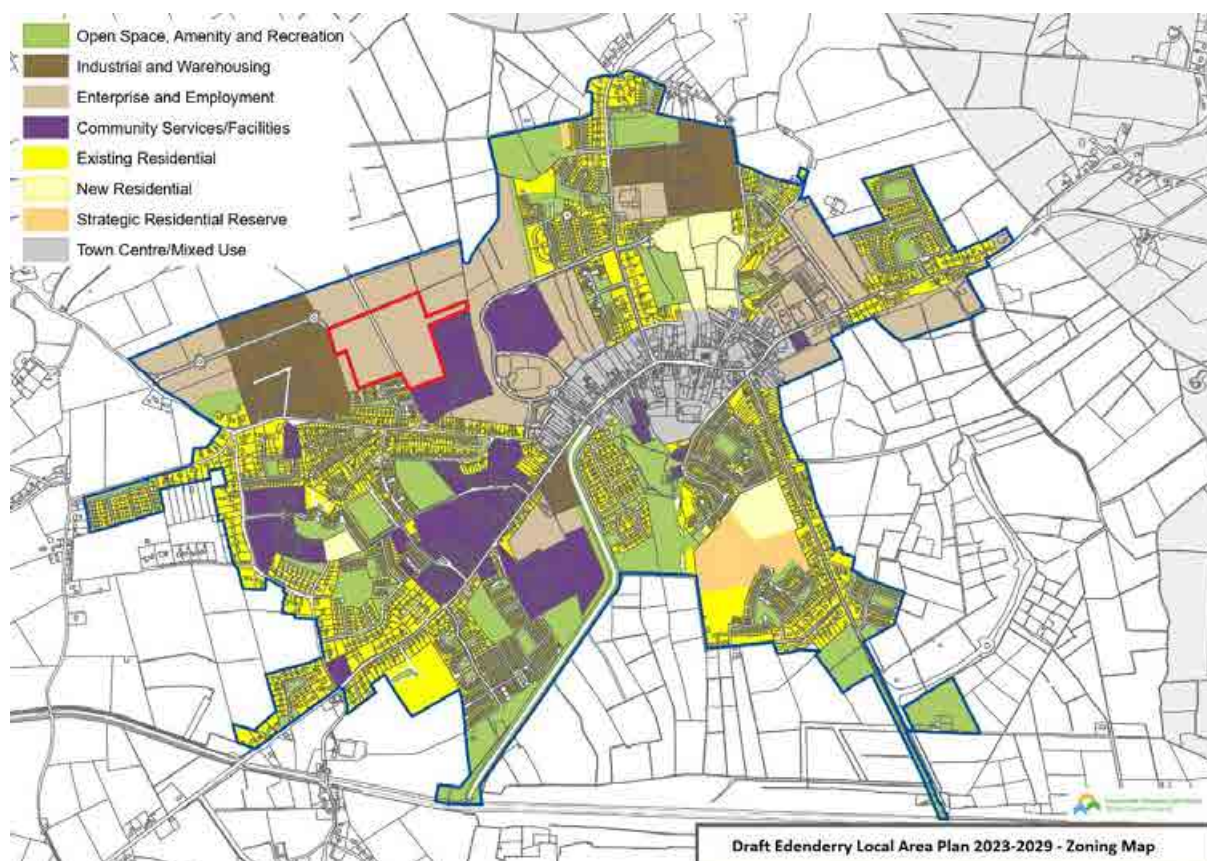
**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs:resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

In addition Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

Accordingly, I do not recommend amending the zoning of the subject site and to retain the 'Enterprise and Employment' zoning in line with the strategic function of the site to provide employment generating land uses in proximity to the next phase of the Edenderry Inner Relief Road.



### Subject Site outlined in red

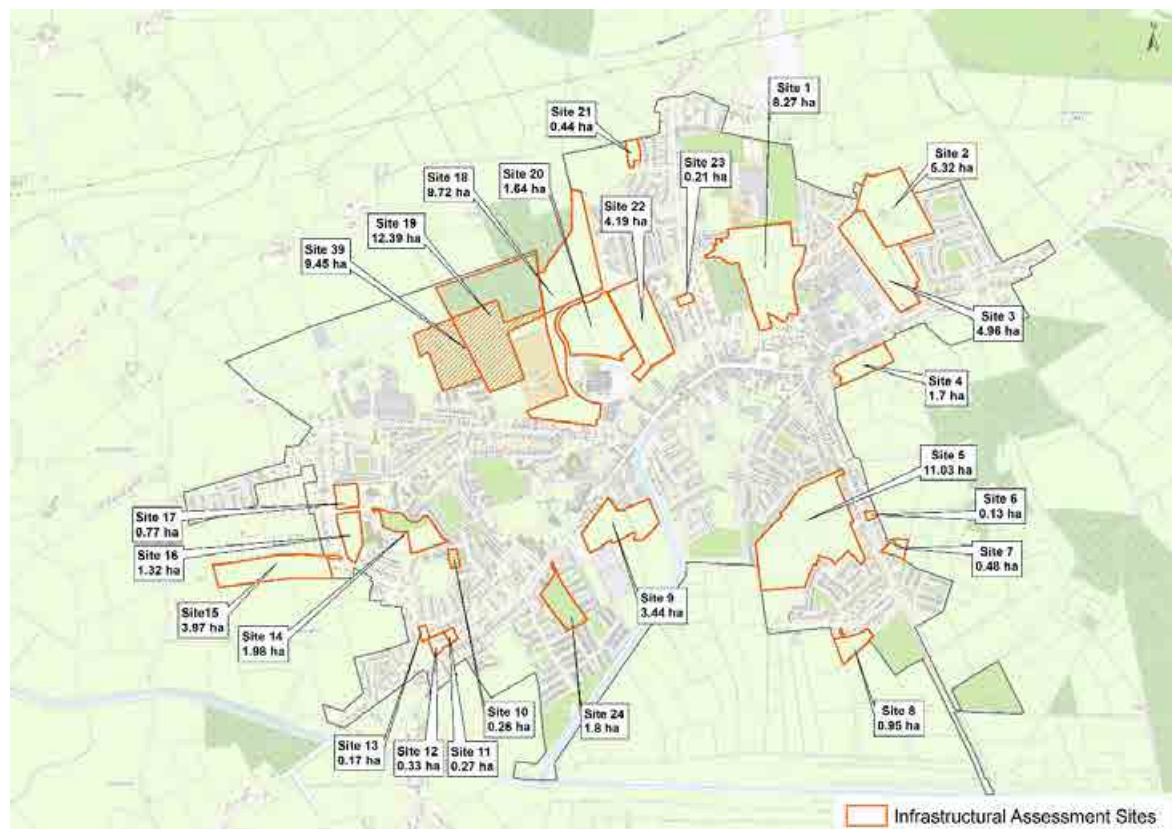
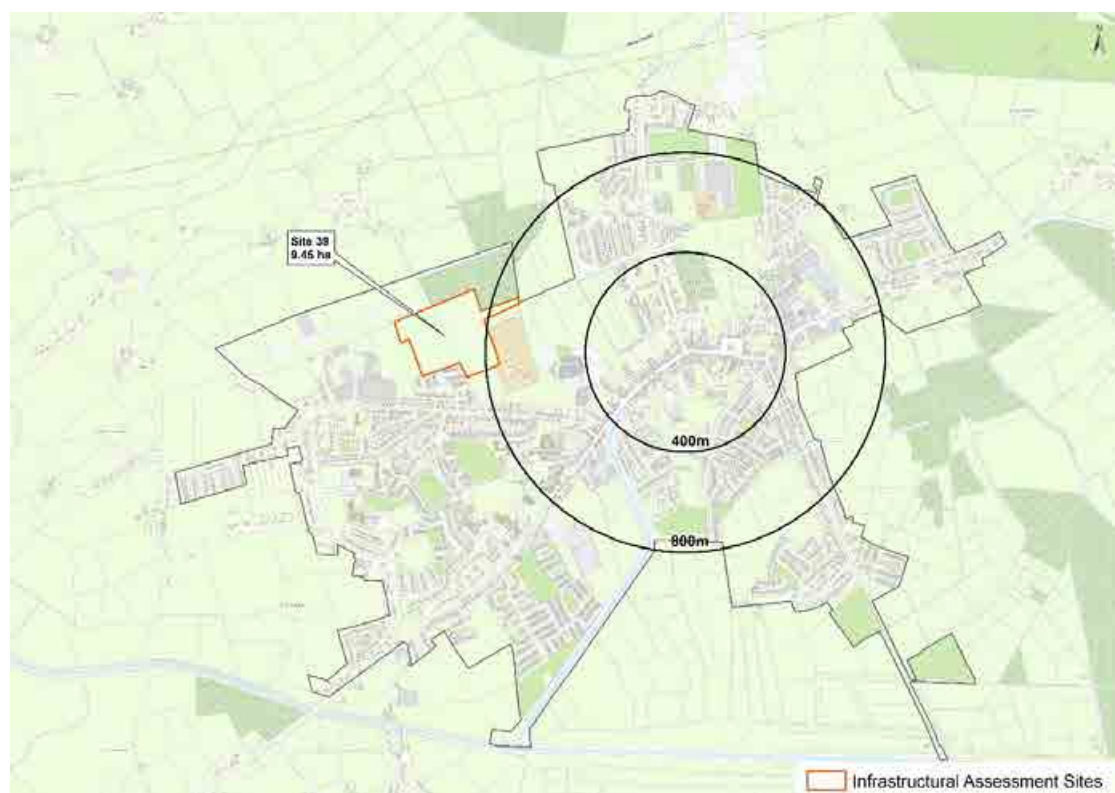
The subject site has already been partially assessed in the Planning and Infrastructure Assessment under Site 19. I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site (Site 39). It is necessary to amend Figure 10.1 and Figure 10.2 and Table 10.1 and Table 10.2 to make reference to the subject site as follows;

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
39	Edenderry North west	9.45 ha	Primarily flat greenfield site with some embankments centrally, marshy soil with some evidence of inundation at north east corner. Currently accessed via unsurfaced private lane to the west. Route of future section of Inner Relief Road traverses the land in an east-west direction. Site lies to the north west of Edenderry Shopping Centre, which is separated by the Edenderry WWTP land.

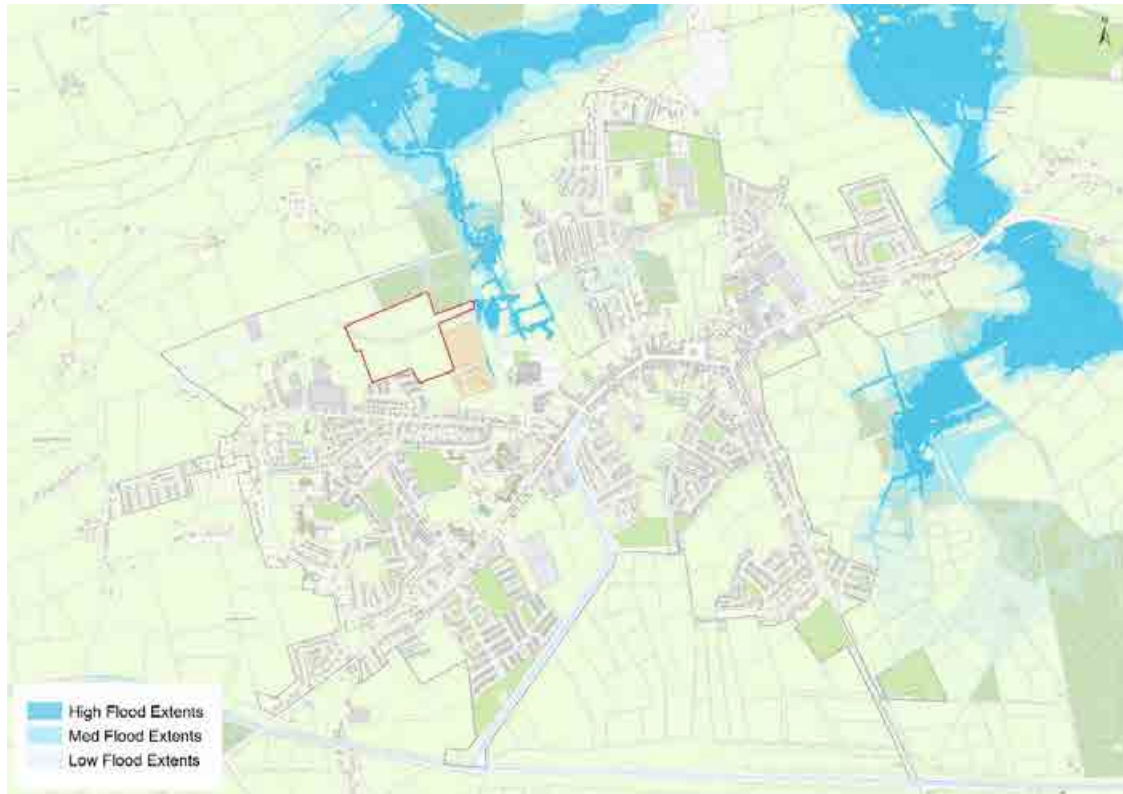
Table 10.2 Site Appraisals

Site No.	Criteria	Recommendation	Justification
39	Promotes compact growth	Zone 'Enterprise and Employment'	Having regard to the proximity of the site to Edenderry Wastewater Treatment Plan, it is considered not suitable for residential development. Having regard to the proximity of the site to the Edenderry Business Park and the potential extension of the Park into this part of the town, in addition to the proposed Distributor Road running through the site, an Enterprise and Employment zoning is considered reasonable. Whilst it is noted that part of this site is located on land 'Constrained Land Use', it is considered that this site is suitable for enterprise and employment as these uses are not considered vulnerable flood uses for the most part. As per Objective LUZO-13 in Chapter 11 of this Plan, the Planning Authority will have to satisfy itself that any proposed use is in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as amended.
	Promotes sustainable mobility		
	Availability of infrastructure & Services		
	Physical suitability		

**Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment****Figure 10.2 Distance of sites from Edenderry Town Centre**

The flood extents map below illustrates the eastern boundary of the subject site is impacted by Flood Zones A and B. There is an existing Part VIII consent in place for the phase 2 inner relief road at this location with works due to commence in 2023.

**Figure 10.3 Location of Site in Relation to Flood Extents**



**Ref: ELAP-D-25**

**Person / Body:**

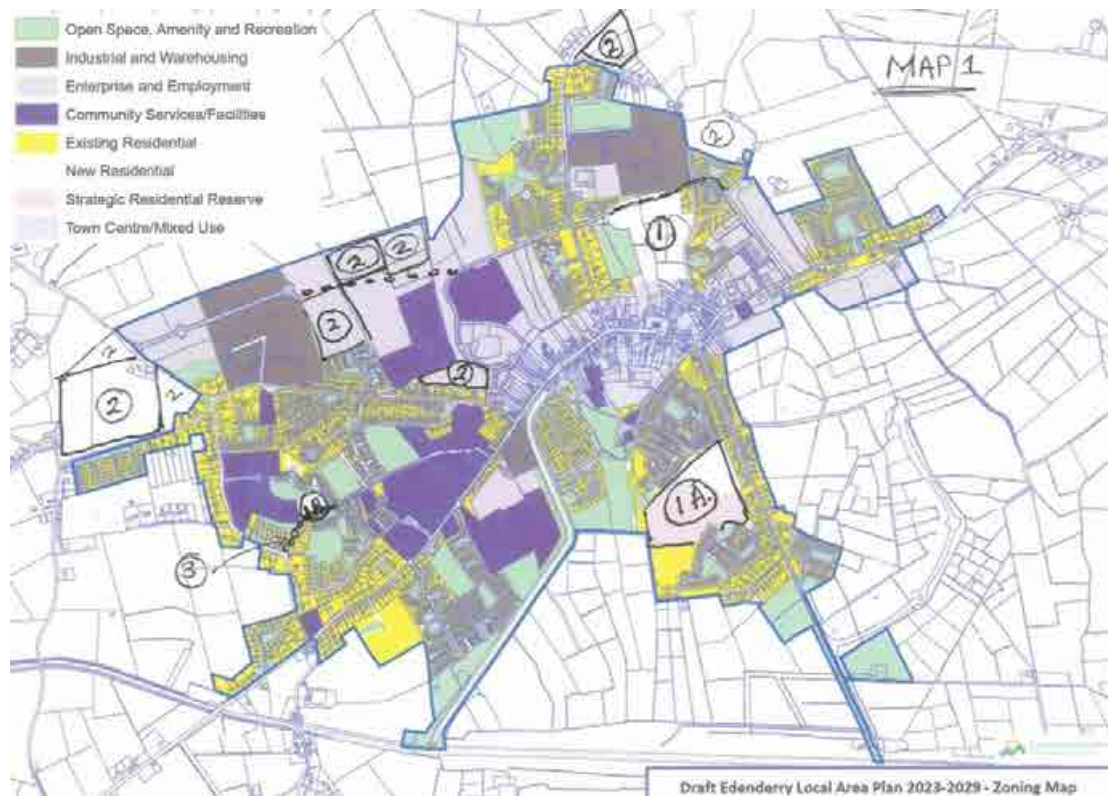
**Declan Conlon**

**Summary of submissions / observations:**

This submission relates to a number of landholdings within Edenderry that are put forward for alternative land use zonings at various locations throughout the town. The main points of the submission are as follows:

1. The first stage of the inner relief road as completed and the next stage (yet to be constructed) seem to have been omitted from the land use zoning map and should be included on the plan as it shows what land will be available for development in the future. The completed Blundell Avenue is also not shown. "Bubble Indicative" roads shown on the current LAP 2017-2023, including a road to the rear of JKL Street should be reinstated on the Draft plan.
2. Reduction of Town Boundary in the draft Plan excludes a number of houses that were previously located within the LAP boundary. The submission seeks the current LAP boundary 2017-2023 to be retained in the Edenderry LAP 2023-2029.

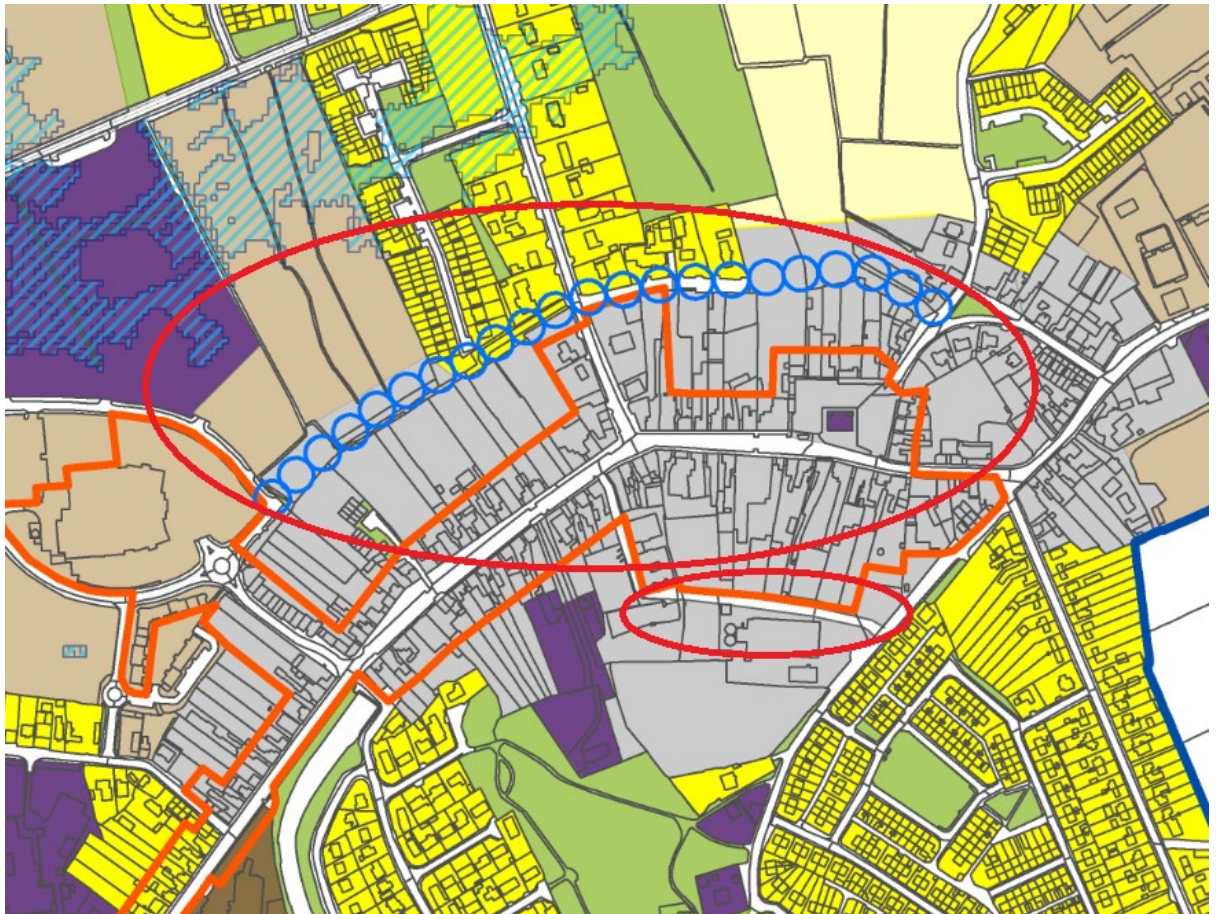
3. The submission refers to a number of sites that should be amended:
- a) Lands opposite Rosderra (Marked 1 below) processing plant to the north of town centre that are currently proposed for 'New Residential' zoning. The submission states these lands contain boggy land and are unsuitable for housing, and requests the zoning to be changed to 'Business/Employment'.
  - b) Lands to the south of the town centre, located to the west of Fr. Paul Murphy Street (Marked 1A below) and currently proposed as "New Residential" and "Strategic Residential Reserve" should be dezoned due to existing levels of residential development in this area and associated traffic, particularly at the JKL Street/Fairgreen/Father Paul Murphy Street junction. The focus should be on more compact development utilising the inner relief road.
  - c) The submission states that the area of land marked 1B on the graphic below and located at Killane Drive, should not be zoned "New Residential" due to the number of existing houses in this area. A "bubble indicative road" option should also be added to this location linking L10273 with Killane Drive and to relieve school traffic.
  - d) The areas of land marked 2 on the below figure are also put forward as potential locations for residential zoning in the subject submission. These are all considered suitable by the submission due to their location in relation to the existing and future phases of the Inner Relief Road.
  - e) Existing sites zoned "Low Density Residential" as indicated in the current LAP 2017-2023 should be retained in the Draft LAP 2023-2029 to provide variety in the type of housing provided in the town.
  - f) The site of the existing Oaklands College is zoned "Community Services" and should be rezoned for sheltered housing/new residential/Strategic Residential Reserve due to the proposed relocation of the school to the old hotel site.
  - g) The Town Centre as marked in the Draft Plan should be extended to include the Dunnes Stores Shopping Centre, the proposed new Oaklands College site and as far as the Tesco Supermarket.



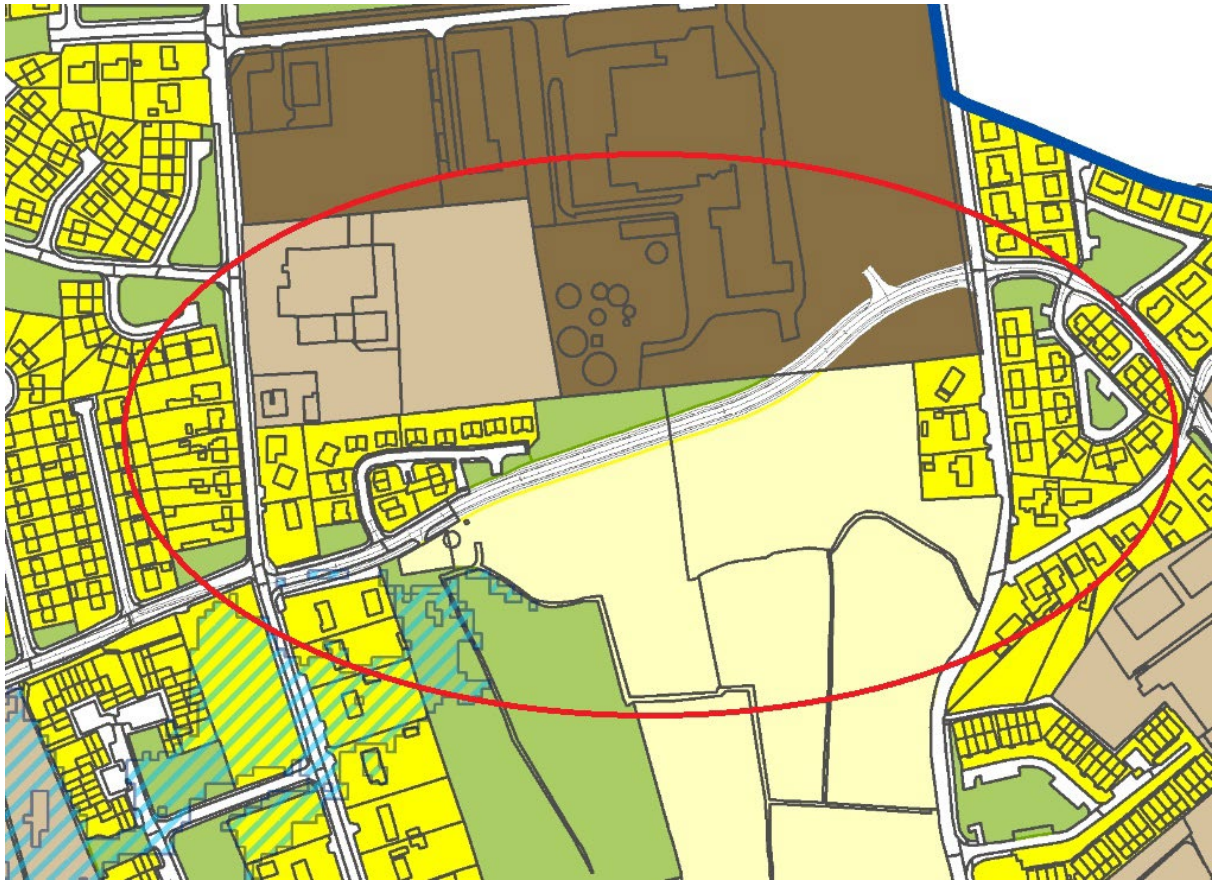
### ELAP-D-25 – Proposed Sites for De-zoning/amendment

#### CE Response:

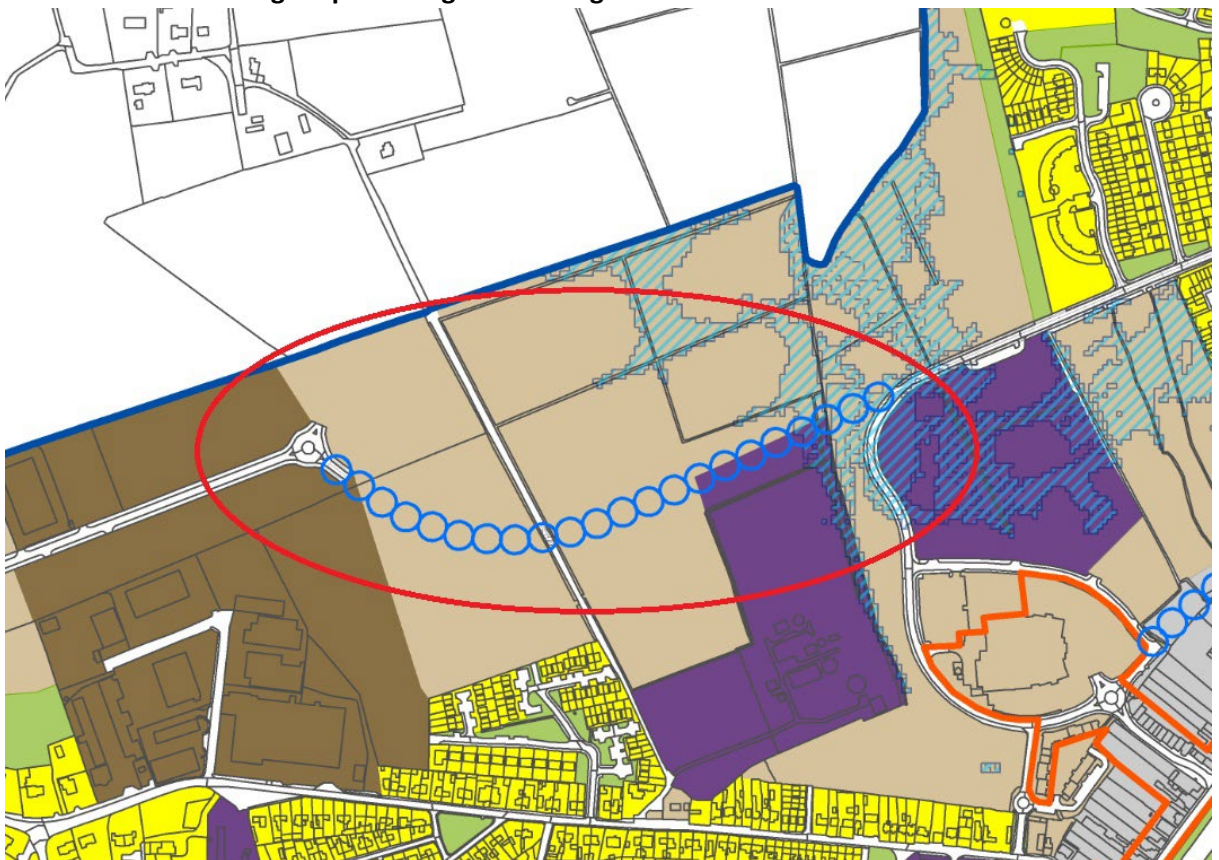
1. I recommend the Draft LAP Zoning Map 2023-2029 is amended to include the existing and future phases of the Inner Relief Road, the indicative route to the rear of JKL Street and the completed Blundell Avenue as illustrated in the figures below:



Land Use Zoning Map with Blundell Avenue and indicative route to north of JKL Street included



**Land Use Zoning Map showing the existing Inner Relief Road Phase 1 included**



**Amended Land Use Zoning Map with Proposed Infrastructure – Inner Relief Road Phase 1  
Indicated with blue circle/indicative route**

2. The LAP Boundary as indicated in the existing Edenderry LAP 2017-2023 extends to the River Boyne to the north, the Kildare border to the east and the Grand Canal to the south. The boundary also extends to agricultural land to the west and includes 'white' land within each of these land areas. To support compact growth objectives as set out in National and Regional planning policy, which includes objectives to provide at least 30% of new homes within the built up area and that a significant proportion of future development would take place within the boundary of the built footprint of all settlements, the LAP boundary is amended to the extents of the built up area.
3. The Local Authority is bound by the population figures provided in the National Planning Framework, Regional Spatial and Economic Strategy for the Eastern and Midlands Region and the Offaly County Development Plan 2021-2027. Based on the existing and future levels of infrastructure available within the lifetime of the Edenderry LAP 2023-2029, it would not be appropriate for the Edenderry Local Area Plan 2023-2029 to include additional residential zoned land as requested in this submission. Approximately 11.65ha of "New Residential" zoned land is provided in the Draft Plan and this is considered reasonably in excess of the Core Strategy recommended figure of 10hectares of 'New Residential' zoned land. It is considered that the lands identified within the town that are more appropriately located for 'New Residential' zonings, closer to the town centre that support compact growth in line with the principles of National Planning Framework (National Strategic Outcome 1) and the Regional Spatial and Economic Strategy (Regional Strategic Outcome 2) that will deliver the Core Strategy housing allocation for the town over the lifetime of the development plan.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that *'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'*. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'*

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned approximately 11.75 hectares of land 'New Residential'. This submission proposes to unacceptably exceed the allocation by approximately 32 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs:resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

In addition Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

An analysis of each of the sites referred to in the submission is provided below:

- a. Site 1 (as identified on submission map): This area is identified for "New Residential" in the draft LAP due to the proximity of the site to the town centre and potential for sustainable transport links to the urban core of Edenderry as well as shops, schools and other amenities. I refer to Site 1 of the PIA in Chapter 10 in relation to the infrastructural assessment of the subject site.

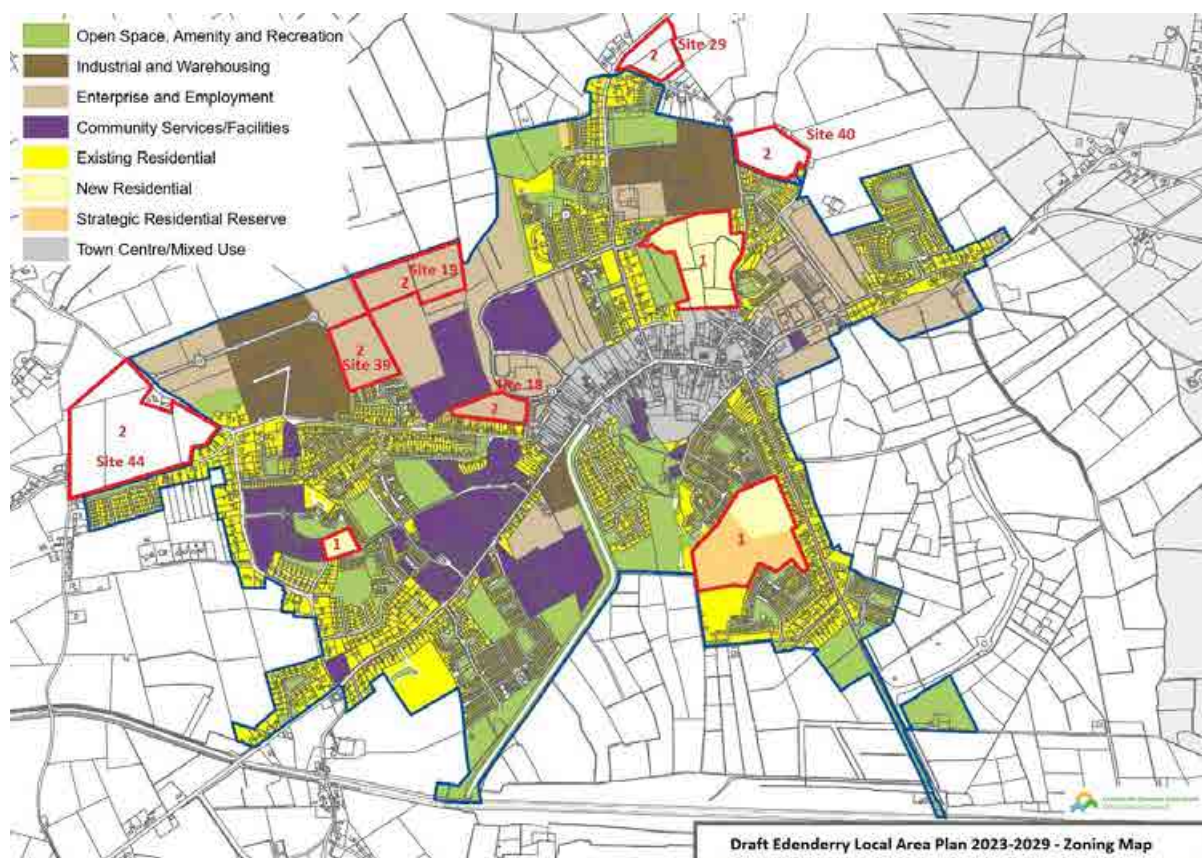
A Site Investigation Report was undertaken during the design process and Part VIII application for Phase 1 of the Inner Relief Road, which indicates the various soil types in the surrounding area. There are no constraints identified within the Soil Assessment Report that would preclude development of the subject land area for future residential subject to appropriate detailed design measures. The condition of the soil is therefore not considered an appropriate reason to dezone 'New Residential' land

that is well located in proximity to the Town centre and to promote principles of compact growth and sustainable development of the town.

It is noted that the OPR submission Ref ELAP-D-29 states that *'The consolidation of the employment and enterprise land use zoning through the rezoning of some such land for new residential is a positive approach'*.

- b. Site 1A: This site is zoned a combination of 'New Residential' and 'Strategic Residential Reserve' in the draft LAP due to the proximity of the site to the existing built up, residential area, the accessibility of the site from the Town Centre and location adjacent to Blundell Park and associated amenities. I refer to site 5 of the PIA in Chapter 10 of the Draft LAP in relation to the infrastructural assessment of the subject site. I therefore do not recommend any alterations to the Draft Plan on foot of this point of the submission.
- c. Site 1B: This site is zoned 'New Residential' in the draft LAP due to the proximity of the site to the existing built up, residential area and the accessibility of the site to local schools and from the Town Centre and associated amenities. I refer to Site 14 of the PIA in Chapter 10 of the Draft LAP in relation to the infrastructural assessment of the subject site. I therefore do not recommend any alterations to the Draft Plan on foot of this point of the submission.
- d. Site 2: A number of landholdings are identified under this site number (No. 2) in the subject submission. Four of the sites identified by No. 2 in the submission have already been reviewed in the Planning and Infrastructural Assessment. Sites 18 and 19 to the south and north of the Waste Water Treatment Plant, were reviewed in the Draft LAP under Chapter 10. Site 29 and site 39 are reviewed and assessed in my response to submissions ELAP-D-06 and ELAP-D-24 respectively. I refer to Chapter 10 of the Draft LAP for assessment of Sites 18 and 19 and for the CE Response to Submissions SLAP-D-06 and ELAP-D-24 for assessment of sites 29 and 39 respectively.  
I do not recommend any alterations to the zoning of these sites on foot of their location adjacent to the waste water treatment plant and the peripheral location of the lands (particularly Site 29) in relation to the Town Centre. The location of residential development solely on foot of proximity adjacent to proposed road infrastructure in the format of the Inner Relief Road is not supported and would be considered to be promoting car based development, which is contrary to the proper planning and sustainable development of the area. Site 19 is also subject to inundation, which would further preclude vulnerable land uses at this location.

Sites 40 and 44 are reviewed in the following sections. The location of the various landholdings number 2 in the subject submission are shown below with their PIA reference number also provided.



#### ELAP – D – 25: Subject Sites outlined in red

I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of Site 40 and Site 44. It is necessary to amend Figure 10.1 and Figure 10.2 and Table 10.1 and Table 10.2 to make reference to the subject sites as follows;

**Table 10.1 List of Sites Assessed**

Site No.	Site Name	Site Area	Site Description
40	Clonmullen Court	3.48 ha	Grazing agricultural land. Sloping land from north to south with residential land to the south and agricultural/grazing land to the north. Rosderra processing plant is located to the west.

Site No.	Site Name	Site Area	Site Description
44	Monasteroris/R441	14.94 ha	Grazing agricultural land. Flat land with residential land to the south and east and agricultural/grazing land to the north.

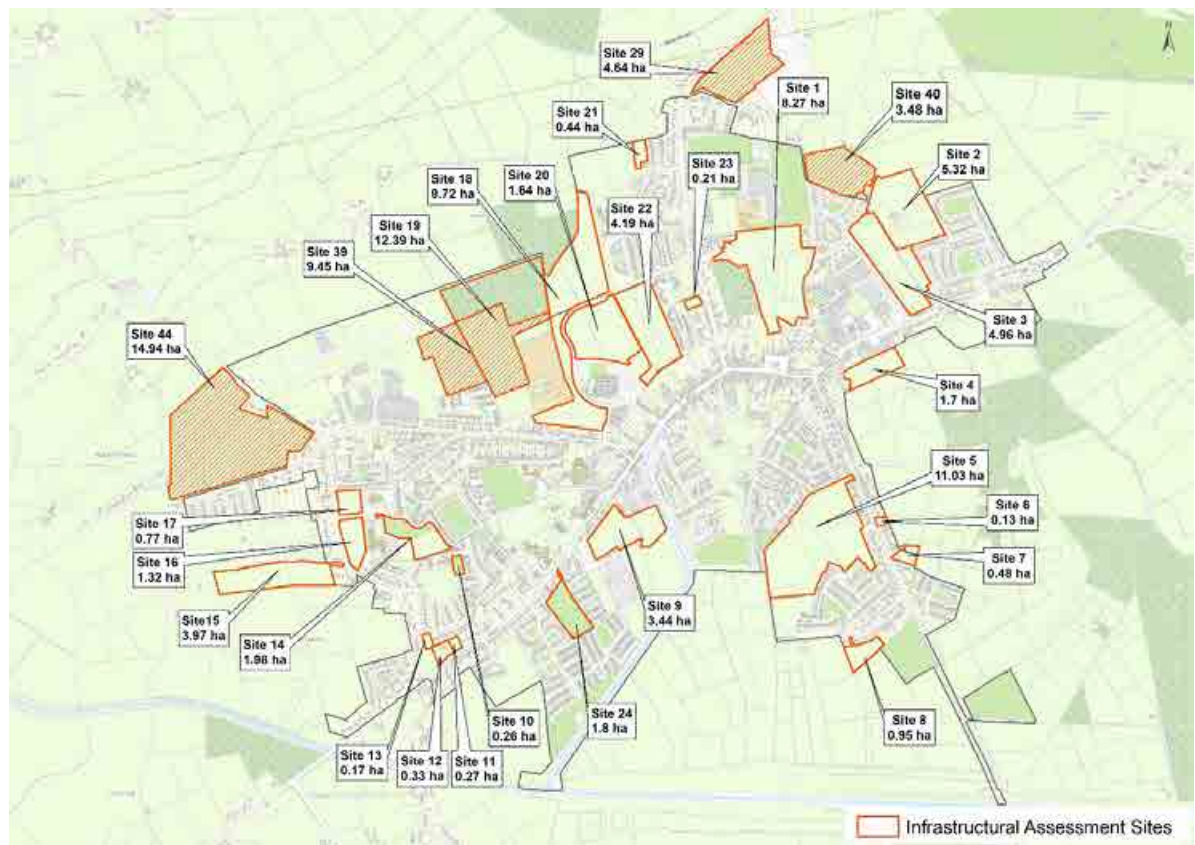
Table 10.2 Site Appraisals

Site No.	Criteria	Recommendation	Justification
40	Promotes compact growth	Do not zone	<p>The subject site is removed from Edenderry Town Centre and is at the periphery of the existing built up area.</p> <p>This site is peripheral to the town, located approximately 900 metres from the town centre. In addition, it is noted that there exists no footpaths or cycleways running along the road. Zoning this site for residential development would constitute urban sprawl, increase car dependency and would not support compact growth.</p> <p>There are other lands more suitable for residential development identified in the Plan Area.</p>
	Promotes sustainable mobility		
	Availability of infrastructure & Services		
	Physical suitability		

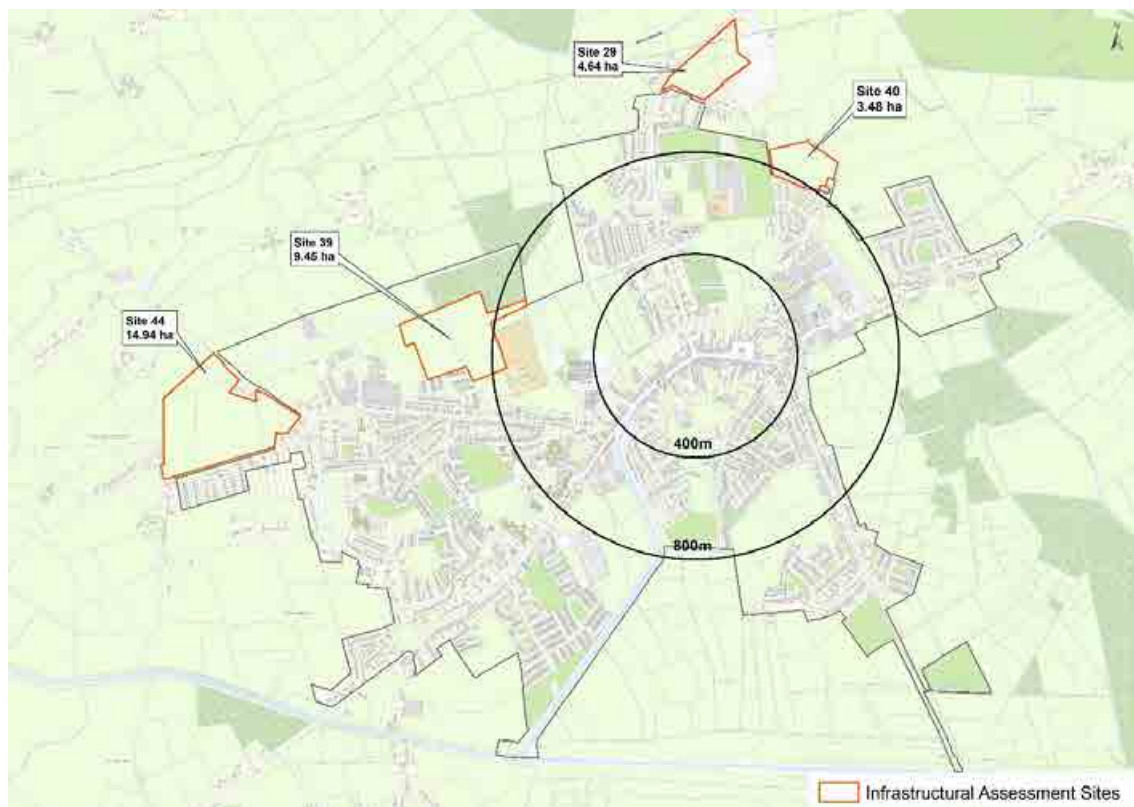
Site No.	Criteria	Recommendation	Justification
44	Promotes compact growth	Do not zone	<p>The subject site is removed from Edenderry Town Centre and is at the periphery of the existing built up area.</p> <p>This site is peripheral to the town, located over 1000 metres from the town centre. In addition, while there is some piped infrastructure in the area it is noted that there exists no footpaths or cycleways running along the road. Zoning this site for residential development would constitute urban sprawl, increase car dependency and mitigate against the promotion of compact growth.</p>
	Promotes sustainable mobility		
	Availability of infrastructure & Services		
	Physical suitability		

		There are other lands more suitable for residential development identified in the Plan Area.
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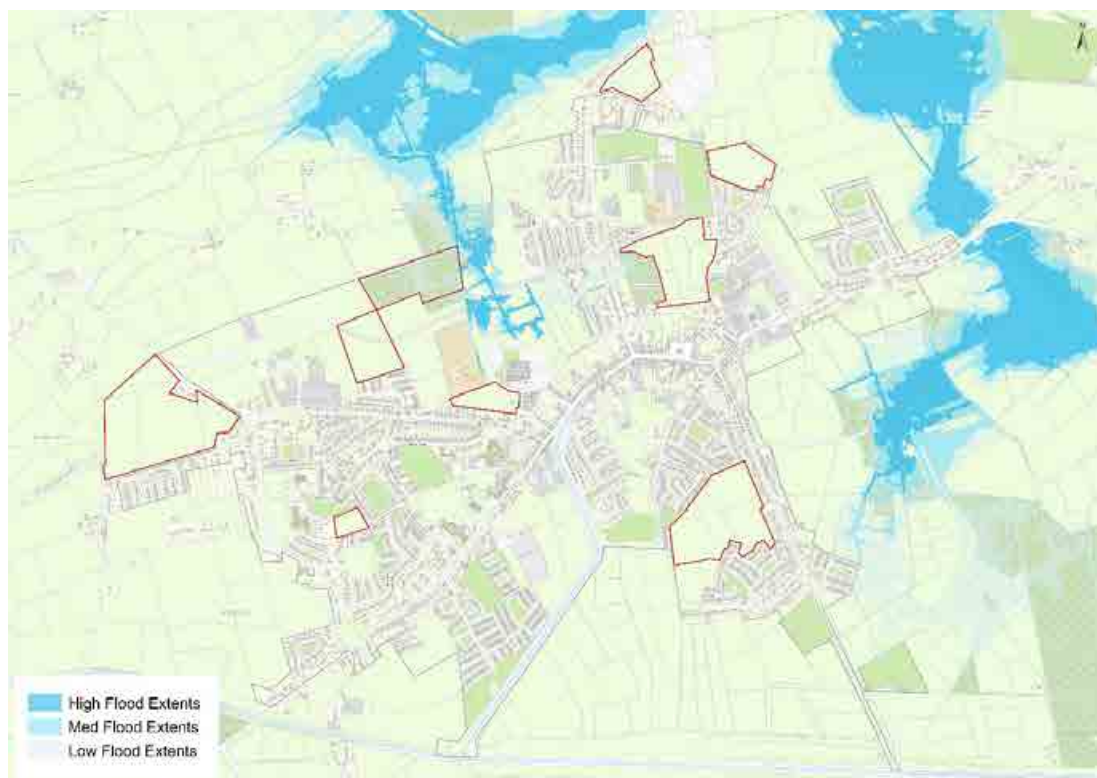
Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment (Sites 29, 39, 40 and 44)



**Figure 10.2 Distance of sites from Edenderry Town Centre**



**Figure 10.3 Location of Site referred to in Sub-D-25 in Relation to Flood Extents**



- e. The 'Low Density Residential' land use zoning is no longer in use within Offaly Development Plan documents and it is therefore not appropriate to provide this zoning within the development boundary of Edenderry LAP. The 'New Residential' zoning covers a range of densities and is considered more than appropriate to provide for the Core Strategy allocation for Edenderry. Accordingly, I do not recommend reinstatement of the low-density residential in the Draft LAP.
- f. The 'New Residential' land use zoning proposed within the Draft LAP can provide an average density of 30 dwellings per hectare on approximately 11.65 hectares of land. This could potentially provide an approximate additional 350 dwellings during the lifetime of the LAP, which is consistent with projected population demand provided in the Core Strategy of the County Development Plan 2021-2027.

The 2016 Census of population provided a figure of 7,359 persons in Edenderry. Preliminary figures for 2022 give an approximate population of 7,502 for Edenderry which equates to an average annual increase of 23.8 people per annum over the 2016-2022 period. A continuation of this average trend up to 2029 would give an additional population of 166 for a total of 7,668 persons. The amount of zoned land is considered more than adequate to address projected population growth within the plan period including a variety in housing types. Rezoning the existing Oaklands College site from 'Community Services/Facilities' to 'New Residential' would result in an unacceptable exceedance of projected residential land use outlined Core Strategy.

I therefore recommend no further alterations to the Draft LAP on foot of this point of the submission.

- g. As specified in the National Planning Framework there is now a need for a major focus on regenerating original town centre and main street areas and how they relate to the expanded town, with a view to creating more attractive, desirable places that people want to live and spend time in, for work, shopping or recreational purposes. Extending the existing core retail area and town centre to edge of centre locations would dilute the compact spatial planning objectives as they relate to Edenderry. To extend the Town Centre at this point in time to include the Tesco site would be to extend the Town Centre zoning too far from the existing core retail area. The Oaklands College site is not considered a use suitable for Town Centre zoning and is more appropriately retained as a Community Services/Facilities zoning.

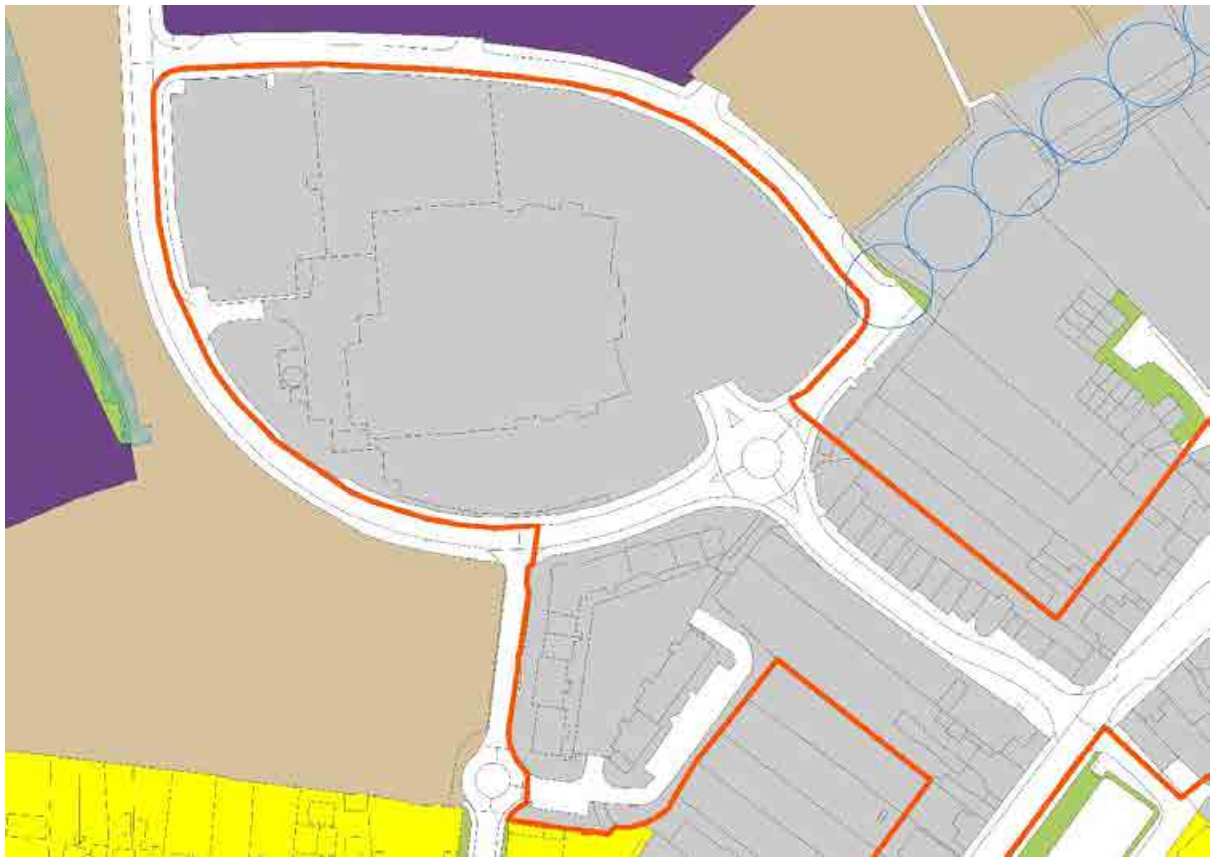
The existing Town Centre is in need of regeneration that has been kick started by the refurbishment of O'Connell Square and will further progress with the roll out of the Blundell Masterplan related projects.

In advance of ongoing regeneration projects, it would be premature to significantly alter the Town Centre zoning, however, given the retail and mixed use function of the Dunnes Stores Shopping Centre and surrounding land I therefore recommend extending the Town Centre Zoning and Core Retail Area boundary to include this land as shown in the figures below:

Draft LAP:



Recommended Amendment:



**Ref: ELAP-D-28**

**Person / Body: Greypost Development Ltd**

**Summary of submissions / observations:**

This submission requests the subject vacant site in the Carrick Hall estate be rezoned from 'Open Space, Recreation and Amenity' to 'New Residential' as to do so would lead to an improvement in visual amenity for surrounding residences and supports compact growth in accordance with national, regional and local planning policies.

**CE Response:**Zoning Request:

Whilst the subject site is an infill site within an existing residential area, it is noted that it is located on land designated 'Constrained Land Use' (see flood map below) and as such is not considered suitable to be zoned 'New Residential' in the Draft Plan. It is recommended that the zoning of the site remain 'Open Space, Recreation and Amenity'.



### Planning and Infrastructural Assessment:

I recommend that Chapter 10 Planning and Infrastructural Assessment be amended to include assessment of this subject site. It is necessary to amend the following tables/figures to make reference to the subject site;

- Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment;
- Figure 10.2 Distance of sites from Edenderry Town Centre
- Table 10.1 List of sites assessed; and
- Table 10.2 Site Appraisals.

Note: The site subject to this submission is labelled 'Site 43' in proposed revised mapping in the Planning and Infrastructural Assessment.

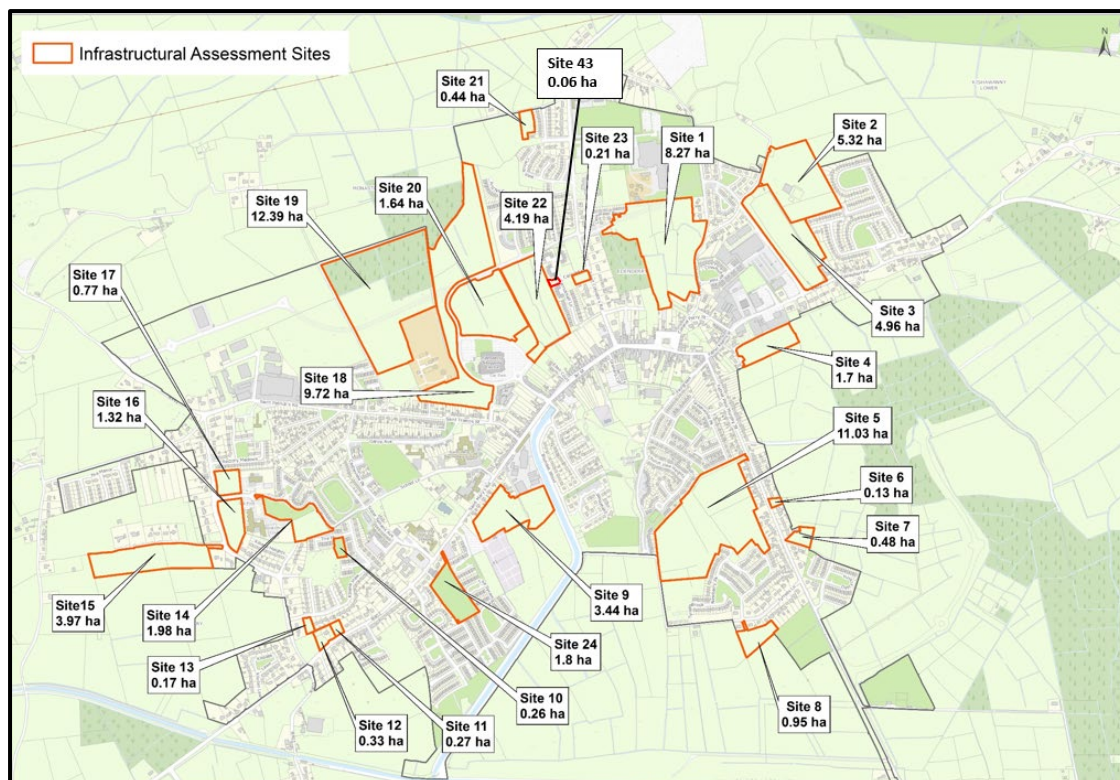


Table 10.1 List of Sites Assessed

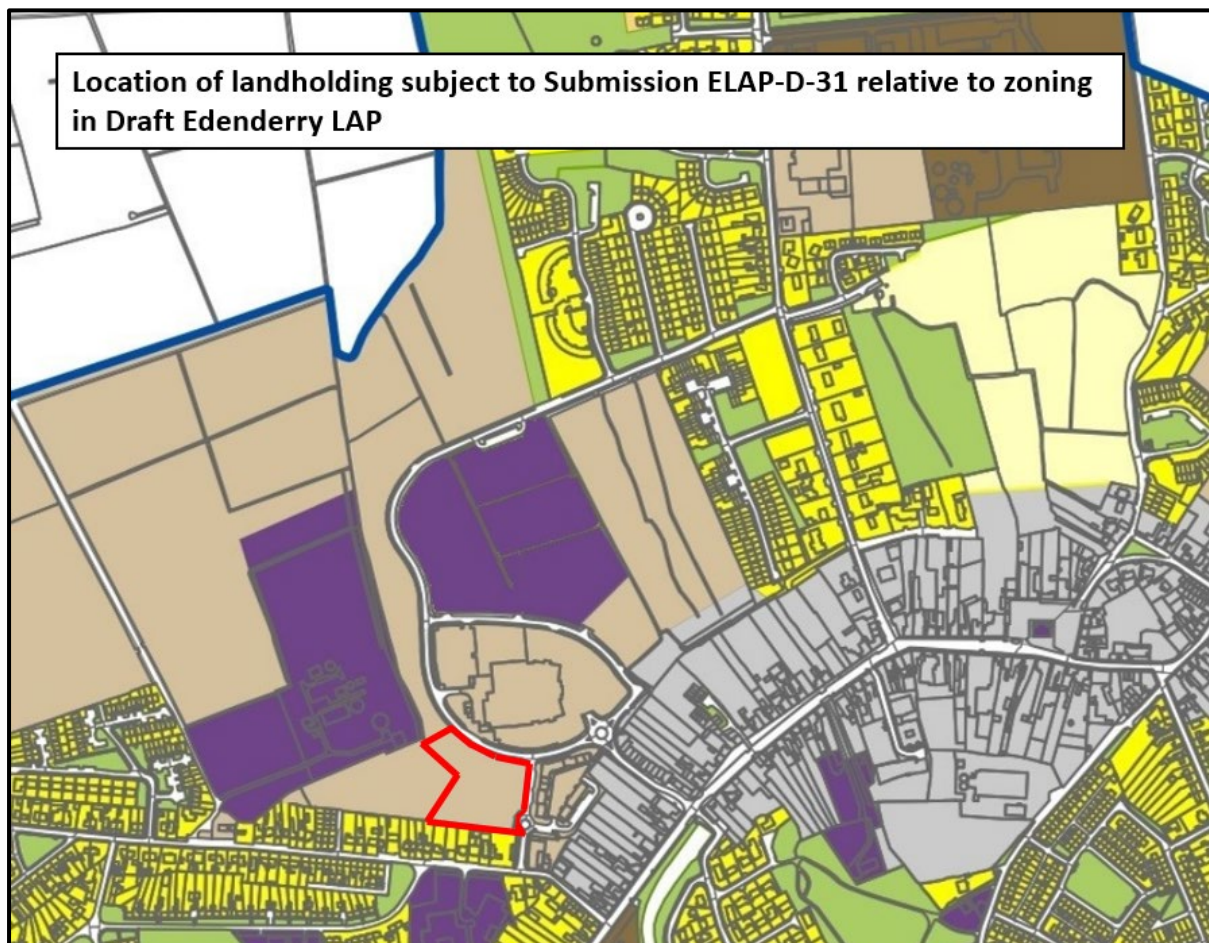
Site No.	Site Name	Site Area	Site Description
43	Carrickhall Estate	0.06 ha.	Small infill site within Carrickhall residential development to the north of the town centre. The site lies vacant. There exists a footpath to the front of the site.

Table 10.2: Site Appraisals

Site No.	Criteria	Recommendation	Justification
43	Promotes compact growth	Zone 'Open Space, Amenity and Recreation'	This site is located on land designated 'Constrained Land Use' and as such is not considered suitable for residential development.
	Promotes sustainable mobility		
	Availability of infrastructure & services		
	Physical suitability and accessibility		

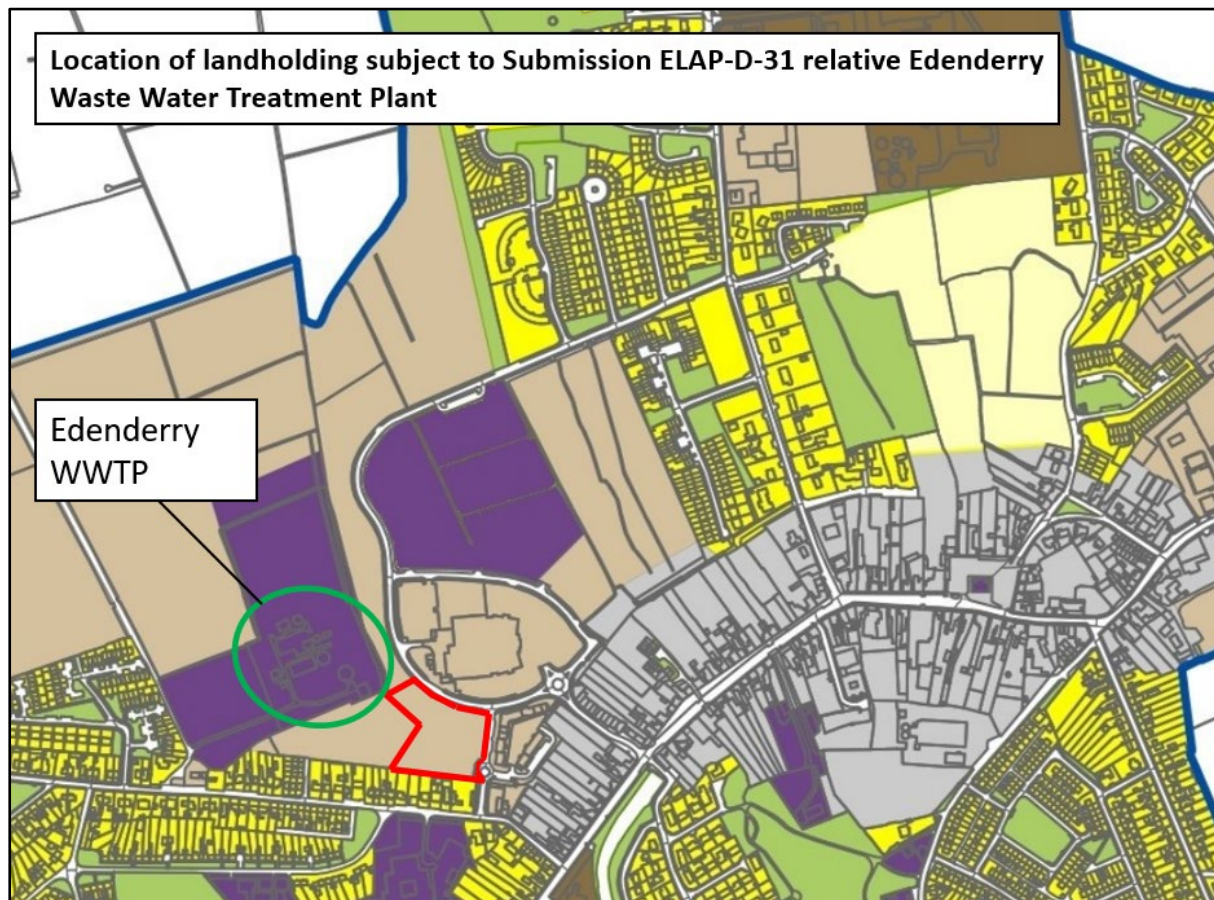
**Ref: ELAP-D-31****Person / Body:** Darren McGill**Summary of submissions / observations:**

This submission requests that the Council allow a social and affordable housing zoning on this site due to its location close to the Edenderry shopping centre, the main street of the town, its accessibility to public transport and the proximity to an undeveloped link road to the eastern boundary of the site. The submission also refers to a recent permission for a small social and affordable development on an adjacent site.

**CE Response:****Zoning Request:**

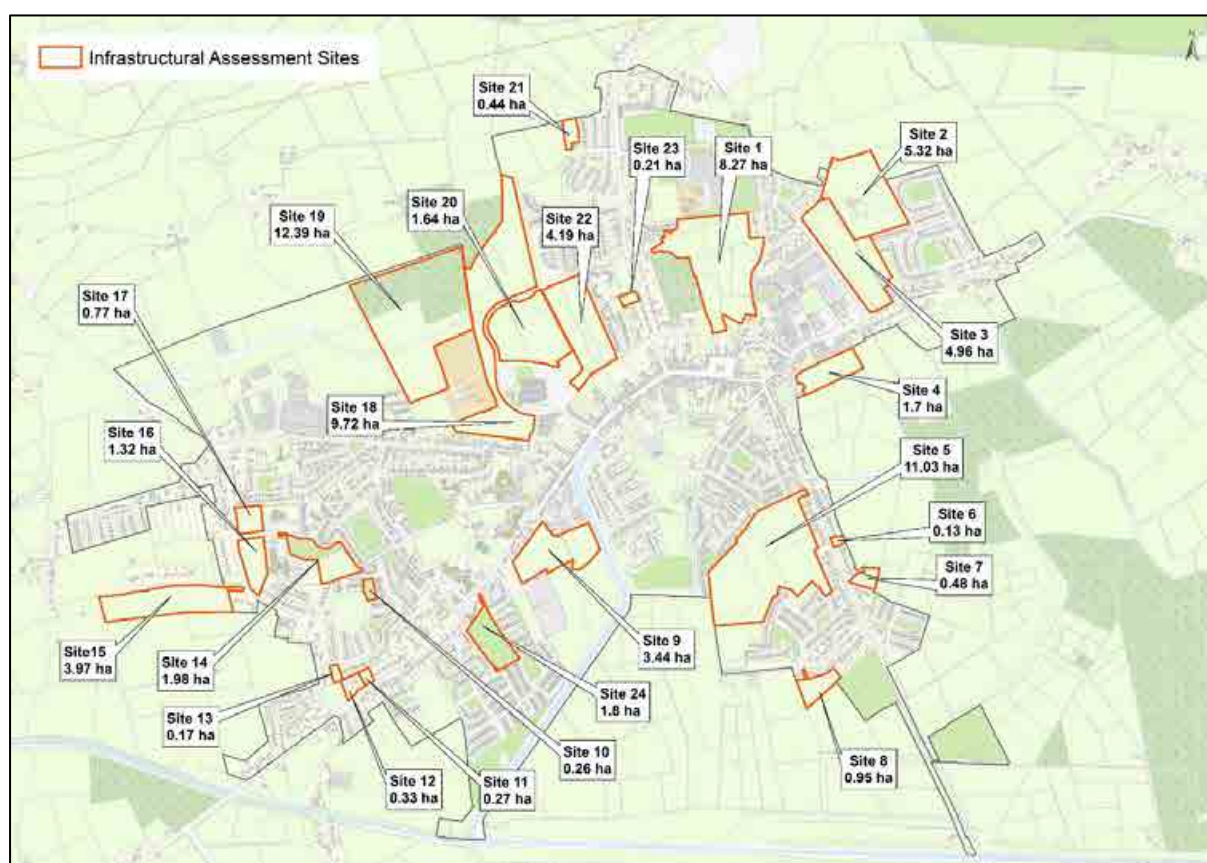
I note that this site of 1.06 ha in size was assessed in the Planning and Infrastructural Assessment in Chapter 10 of the Draft Plan as part of a larger landholding (see extract of Site 18 from Table 10.2 below) which considered that the site was not suitable for residential development on account of its proximity to the Edenderry Wastewater Treatment Plan. An 'Enterprise and Employment' zoning was however considered reasonable on account of the sites proximity to the Edenderry Business Park and the potential extension of the Park into this part of the town, in addition to the proposed Distributor

Road running through the site. I am satisfied that the reasons for the zoning of the site as Enterprise and Employment still stand and therefore I do not recommend any change to the zoning of this site.



Site No.	Criteria	Recommendation	Justification
18	Promotes compact growth	Zone 'Enterprise and Employment'.	Having regard to the proximity of the site to Edenderry Wastewater Treatment Plan, it is considered not suitable for residential development. Having regard to the proximity of the site to the Edenderry Business Park and the potential extension of the Park into this part of the town, in addition to the proposed Distributor Road running through the site, an Enterprise and Employment zoning is considered reasonable. Whilst it is noted that part of this site is located on land 'Constrained Land Use, it is considered that this site is suitable for enterprise and employment as these uses are not considered vulnerable flood uses for the most part. As per Objective LUZO-13 in Chapter 11 of this Plan,
	Promotes sustainable mobility		
	Availability of Infrastructure & Services		
	Physical suitability and accessibility		

Site No.	Criteria	Recommendation	Justification
			the Planning Authority will have to satisfy itself that any proposed use is in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as amended.



In addition, the Local Authority is bound by the population figures provided in the National Planning Framework, Regional Spatial and Economic Strategy for the Eastern and Midlands Region and the Offaly County Development Plan 2021-2027. Having regard to the 'Enterprise and Employment' zoning of the land, it is considered that there are other lands within the town that are more appropriately located for 'New Residential' zonings, closer to the town centre that support compact growth in line with the principles of National Planning Framework (National Strategic Outcome 1) and the Regional Spatial and Economic Strategy (Regional Strategic Outcome 2) that will deliver the Core Strategy housing allocation for the town over the lifetime of the development plan.

In terms of zoning land for 'New Residential', the *National Strategic Outcome 1 (NSO 1)* of the National Planning Framework (NPF) is to seek 'Compact Growth' across cities, towns and villages. In this regard, the National Planning Framework states that 'From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages...'. *Regional Strategic Outcome 2 (RSO 2)* of the Eastern and Midland Regional

Spatial and Economic Strategy (RSES) supports the NPF's NSO1 stating that *'Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.'*

The Core Strategy under Chapter 2 of the Offaly County Development Plan 2021-2027 provides a transparent evidence-based rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. The population target for the county has been set by the NPF Implementation Roadmap, together with a housing supply target set by the Section 28 Ministerial Guidelines, 'Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020'. The allocated growth for Edenderry as set out in the Core Strategy Table is as follows: a housing supply target of 323 residential units, a population growth of 721 persons above the 7359 population of the 2016 census, and 10 hectares for new residential zoning. The draft Edenderry LAP zoned approximately 11.75 hectares of land 'New Residential'. This submission proposes to unacceptably exceed the allocation by 1.06 ha. This in turn is contrary to the following policies and objectives of the Offaly County Development Plan 2021-2027:

**CSP-01** It is Council policy to implement the Core Strategy for Offaly in order to be consistent with policies at a national and regional level, in particular population targets and distribution.

**CSP-02** It is Council policy to support the compact growth of towns and villages to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

**CSP-03** It is Council policy not to exceed, through the facilitation of residential development, the allocated housing requirements set out in the Core Strategy. In this regard, development shall not be permitted where it conflicts with the Core Strategy.

**CSO-02** It is an objective of the Council to zone an appropriate amount of lands within the settlement areas to accommodate the projected population growth as set out in the Core Strategy, including the undertaking of variations or reviews of Portarlington Joint Local Area Plan and Edenderry Local Area Plan which will be prioritised in view of legislation requirements to ensure consistency with the provisions of the Core Strategy.

**CSO-05** It is an objective of the Council that development proposed on new residential zoned land and on mixed use / town or village centre zoning should proceed on a sequential basis with priority given to lands closest to the centre and / or closest to key transport infrastructure.

**SSP-01** It is Council policy to develop the county in accordance with the Settlement Hierarchy and to require future residential development to locate at and be of a scale appropriate to the settlement tiers and levels identified in the Core Strategy Table.

Edenderry has experienced rapid population growth of 25% in the 10 years between 2006 and 2016 census (regional average is 15% according to RSES) with high levels of commuter focused residential expansion without equivalent increase in jobs and services. It has a jobs:resident workers ratio of 0.637 which indicates a poor economic function (above 0.7 is a strong economic function according to RSES). It is located within the area mapped as the 'Core Region' by EMRA where catch-up investment is required to become more self-sustaining. Accordingly, it is described as a Self-Sustaining Town in the County Settlement Hierarchy as per the Offaly County Development Plan 2021-2027. The future development of Edenderry must be carefully managed to assist it to become more self-sustaining by providing the catch-up investment and avoiding exceeding the Core Strategy allocation.

In addition Irish Water, in their submission (ref ELAP-D-26) states in relation to wastewater treatment that 'the treatment plant currently has no capacity for new connections...'

### 3.2.3 Environmental

**Ref: ELAP-D-01**

**Person / Body:**

**Environmental Protection Agency (EPA)**

**Summary of submissions / observations:**

SEA Guidance document should be taken into account when preparing the LAP. The LAP should also be consistent with the policies and objectives of the National Planning Framework (NPF) and the Eastern and Midland Regional Spatial and Economic Strategy (RSES).

The EPA recommend the following is included in the Environmental Report in line with SEA Regulations:

- Mitigation Measures
- Monitoring (with effective and suitable remedial action where appropriate)

Any future amendments to the plan should be screened using the same method as applied in the 'environmental assessment' of the plan.

The SEA Statement – 'information on the decision' should be issued upon adoption and should summarise:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA statement with the above information should be sent to any environmental authority consulted during the SEA process. The following should be consulted as per SEA Regulations:

- EPA
- Minister for Housing, Local Government and Heritage
- Minister for Environment, Climate and Communications
- Minister for Agriculture, Food and the Marine
- Any adjoining relevant adjoining planning authority

**CE Response:**

The Edenderry LAP will be prepared with reference to all relevant environmental legislation including the SEA Regulations. Environmental consultants are procured to prepare the SEA on the Edenderry LAP. The Plan will be prepared to be consistent with the Offaly County Development Plan 2021-2027,

which is consistent with the provisions of NPF and the Eastern and Midland RSES. All environmental authorities have been and will continue to be consulted as part of the plan preparation process. I therefore recommend no further amendments to the Edenderry Local Area Plan on foot of this submission.

**Ref: ELAP-D-19**

**Person / Body:**

**Department of Housing, Local Government and Heritage (DHLGH)**

**Summary of submissions / observations:**

The purpose of the submission is to inform Offaly County Council on its obligations in relation to nature conservation, European sites, biodiversity and environmental protection in the process of preparing the Edenderry LAP 2023-2029.

1. DHLGH notes Objective EDO-02 of the Draft Edenderry LAP 2023-2029 in relation to development of greenways, heritage trails and looped walks and recommends that such developments be subject to Ecological Impact Assessment (EclA), in accordance with Objective BLO-04 of the County Development Plan 2021-2027.
2. The Department recommends that all the results of any bat/swift surveys are collated in order to provide monitoring data on the impacts of the LAP on biodiversity and this should be included in the monitoring section of the Strategic Environmental Assessment.
3. The Department recommends that section 6.5.3 of the Draft LAP in relation to Pollination Zones/Biodiversity Zones includes a provision that wildflower seed mixes will not be planted outside of garden settings as recommended by the All-Ireland Pollinator Plan.
4. The Department recommends that the Draft LAP attenuation measures be only permitted below ground level in exceptional circumstances where it is demonstrated that SuDs devices are not feasible.
5. The Department notes that large areas of existing Green Infrastructure has been zoned for 'Enterprise and Employment'. The Department recommends that SEA must assess the impacts of the loss of areas of GI and that habitat mapping should be undertaken. Loss of existing green infrastructure along the Boyne River and functionality of the GI Network should be considered. Objectives which contribute to an improvement in water quality of the River Boyne and Weaver's Drain are recommended. Minor watercourses, streams and drains form an important part of the town's GI and should be included on the existing GI map.
6. The Department recommends that objectives to conserve the town's swift population are included in Chapter 6 of the Draft LAP.
7. The Department recommends that indicators should be linked back to environmental effects outlined in Table 8.3 and proposed mitigation measures outlined in Table 9.1. This should

include monitoring of species along transport corridors to avoid displacement of birds and bats for example. Monitoring methods and frequencies must also be defined.

8. The Department notes the importance of Architecture and Built Heritage, including the European Context for the sustainable development of our town centres including the re-use of existing building stock and reducing the environmental trace of new development in existing built up areas. The Department recommends a number of measures to protect architectural heritage including the incorporation of Character assessments into local plans.

#### CE Response:

1. Objective EDO-02 refers to the findings of the Appropriate Assessment that is a supporting document to the LAP as required by Article 6(3) of Council Directive 92/43/EEC of the Habitats Directive. It is not appropriate to refer to environmental assessments as these may be furnished at planning application stage within this objective. This is adequately addressed through the Development Management Standards set out in Chapter 13 of the Offaly County Development Plan 2021-2027.

As correctly identified in the submission Objective BLO-04 in the County Development Plan states: "It is an objective of the Council to ensure that the impact of development within or adjacent to national designated sites, Natural Heritage Areas, proposed Natural Heritage Areas, Ramsar Sites and Nature Reserves likely to result in significant adverse effects on the designated site is assessed by requiring the submission of an Ecological Impact Assessment prepared by a suitably qualified professional, which should accompany planning applications."

These objectives are considered adequate to address the requirements in relation to ecological assessment. I therefore recommend no changes to the Draft Plan on foot of this point of the submission.

2. Table 10.1 in Section 10 of the Strategic Environmental Assessment (SEA) includes a number of 'Targets' and 'Sources' that serve to monitor any impacts arising from the implementation of the LAP. Under Targets of Environmental Component – Biodiversity, Flora and Fauna it is sought to:

'Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions in their land use plans and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.'

Under the heading of 'Sources', it notes:

- 'Internal monitoring of preparation of local land use plans
- Internal monitoring of likely significant environmental effects of grants of permission (grant by grant)'

On foot of the existing provisions within the SEA, I do not recommend any further amendments to the LAP in relation to this element of the submission.

3. Section 6.5.3 of the Draft LAP includes reference to planting of wildlife and biodiversity strips in accordance with the recommendations of the All Ireland Pollinator Plan. In relation to wildflower seed mixes, I recommend including the following text amendment in section 6.5.3:

‘The Council supports pollinator friendly planting and wildlife strips or Biodiversity Zones to enhance biodiversity at approaches to the town, roundabouts, peripheral open space areas in residential areas, along inner relief roads, within the Edenderry Business Park and areas connected to woodlands/farmlands/riparian zones throughout the plan area in accordance with the recommendations of the All Ireland Pollinator Plan. In this regard, the Plan promotes the use of pesticide-free ~~used~~ chemicals by the Council on public land and will seek to progress the reduction, and ultimate cessation, of use of such pesticides. **While visually appealing and dramatic, the planting of wildflower seed mixes do not contribute towards the All-Ireland Pollinator Plan 2021-2025 and this practice is harmful to existing wildflower biodiversity. Wildflower seed mixes should not be planted outside of garden settings as recommended by the All-Ireland Pollinator Plan.**’

4. Specific policies DMS-23 – Sustainable Urban Drainage Systems are provided in the Offaly County Development Plan 2021-2027. This is further supported by other policies that guide the provision of SuDS in new developments including DMS-21 Public Open Space, DMS-22 Green Infrastructure Masterplan, DMS-71 Industrial and Warehousing Developments and DMS-72. There is also reference to SuDS in the following chapters of the draft LAP: Chapter 3 Town Centre and Regeneration, Chapter 6 Biodiversity and Green Infrastructure, Chapter 8 Climate Action and Chapter 9 Critical Infrastructure.

In relation to above ground SuDS measures, I recommend amending Section 6.6 of the Draft LAP as follows:

‘Whilst there is scope for limited attenuation capacity within the SuDS measures listed above, there are better opportunities to provide storage areas within public open spaces in the form of landscaped depressions, ponds and wetlands where possible. ~~Where space constraints apply, underground modular attenuation structures should be considered.~~ **In some exceptional cases, and at the discretion of the Council, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort. Proposals for surface water attenuation systems should include maintenance proposals and procedures.**’

5. A Green Infrastructure (GI) Strategy identifying green infrastructure projects within Edenderry is provided in Chapter 6 of the Draft Edenderry LAP and appropriately examines the existing biodiversity corridors and locations within the plan lands. The existing Green Infrastructure Network is considered to represent the existing areas of land and waterbodies with biodiversity values and which merit inclusion in the GI Strategy. Ecological Corridors and Walking Trails are proposed to run parallel to existing green corridors and future road projects, where green infrastructure will be supported appropriately.

The location and route of Weaver’s Drain to the north of the town is noted. A number of additional informal drains and drain network also connect to this drain and to elevate one of these above the others is not considered appropriate in the context of the LAP document. In

relation to the protection and improvement of water quality within existing water bodies, I recommend the addition of the following objective:

### **Water Quality**

**BGIO-13** Protect and enhance the water quality of the River Boyne and surrounding drains that feed into this river to the north of Edenderry.

In order to integrate the following measures that are set out in section 9 of the SEA, namely,

- (i) Maintain and enhance the existing surface water drainage systems in Edenderry and to contribute towards protection and improvement of surface (including Weaver's Drain and the River Boyne) and ground water quality in accordance with the Water Framework Directive.
- (ii) Applications for development under the Plan must demonstrate that the proposal for development would not adversely affect a water body's ability to meet its objectives under the Water Framework Directive, individually as a result of the proposed development or cumulatively, in combination with other developments.
- (iii) To make reference to the Section 3.5 of the accompanying SFRA, 'Sustainable Urbane Drainage Systems and Surface Water Guidance and Strategy'.
- (iv) To seek to ensure the sustainable and responsible management of coarse fishing activities within the Boyne River, in collaboration with Inland Fisheries Ireland, with regard to the Salmonid River Regs (S.I. No. 293/1988) and the Habitats Directive in order to help maintain the conservation objectives for Salmon (*Salmo salar*), which is Qualifying Interest No. 1106 of the River Boyne and Blackwater SAC.
- (v) To seek to ensure the sustainable and appropriate management of water-based activities and developments along or within the River Boyne, which is hydrologically connected to the River Boyne and Blackwater SAC). This may include the preparation and implementation of visitor management plans and/or Appropriate Assessment under the Habitats Directive if there is a possibility that the activities/developments would negatively affect the Conservation Objectives of any of the Qualifying Interests of the River Boyne and Blackwater SAC."

I therefore recommend amending two policies, firstly policy CIP-07 of the draft LAP as follows:

**CIP-07** Maintain and enhance the existing surface water drainage systems in Edenderry and to contribute towards protection and improvement of surface (including Weaver's Drain and the River Boyne) and ground water quality in accordance with the Water Framework Directive. Applications for development under the Plan must demonstrate that the proposal for development would not adversely affect a water body's ability to meet its objectives under the Water Framework Directive, individually as a result of the proposed development or cumulatively, in combination with other developments.

And also Policy TCP-13 as follows:

**TCP-13** Incorporate Sustainable Urban Drainage Systems (SuDS) and other nature-based solutions in accordance with the ‘Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, 2022’ and any subsequent editions. On key development sites, specifically the Blundell Masterplan site, integrated and area-based provision of SuDS and green infrastructure would be appropriate in order to avoid reliance on individual site by site solutions. Section 3.5 Sustainable Drainage Systems from the Strategic Flood Risk Assessment should be considered in this regard.

And also the following new policies:

#### **BGIP-05**

To seek to ensure the sustainable and responsible management of coarse fishing activities within the Boyne River, in collaboration with Inland Fisheries Ireland, with regard to the Salmonid River Regs (S.I. No. 293/1988) and the Habitats Directive in order to help maintain the conservation objectives for Salmon (*Salmo salar*), which is Qualifying Interest No. 1106 of the River Boyne and Blackwater SAC.

#### **BGIP-06**

To seek to ensure the sustainable and appropriate management of water-based activities and developments along or within the River Boyne, which is hydrologically connected to the River Boyne and Blackwater SAC). This may include the preparation and implementation of visitor management plans and/or Appropriate Assessment under the Habitats Directive if there is a possibility that the activities/developments would negatively affect the Conservation Objectives of any of the Qualifying Interests of the River Boyne and Blackwater SAC.

6. Objective TCP-16: *‘Seek a survey of existing numbers of bats, swifts and swift/nests for planning applications for renovations, redevelopment or demolition of old buildings in Edenderry Town centre. Where bats and/or swifts are shown to be present, specific mitigation measures during and after construction shall be proposed’*, is considered appropriate to conserve the swift population of the town in conjunction with DMS-26 and BLO-19 of the County Development Plan. I therefore recommend no further alterations to the Draft LAP on foot of this point of the submission.
7. The Department’s welcoming of the cited SEO guiding principle *‘no net contribution to biodiversity losses or deterioration’* - is noted.

The Monitoring Programme provided in the SEA Environmental Report contains adequate and appropriate detail to ensure compliance with the legislation.

As required, commitments for monitoring the likely significant effects, if unmitigated, are detailed in Section 10 “Monitoring Measures” of the SEA Environmental Report. The Monitoring Programme outlined contains adequate and appropriate detail to ensure compliance with the legislation (i.e. the SEA Directive and transposing Regulations), including,

for example: information on indicators and targets; consistency with the Eastern and Midland RSES and the Offaly County Development Plan monitoring measures; information on the updating of the Monitoring Programme to deal with specific environmental issues – including unforeseen effects – as they arise; sources for indicators; and responsibility for the ongoing review of indicators and targets, collating existing relevant monitored data, the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, the carrying out of remedial action.

As identified in the 2004 SEA Ministerial Guidelines: “The SEA Directive leaves considerable flexibility to Member States in deciding how monitoring shall be arranged”.

The 2021 SEA Ministerial Guidelines provide additional advice under Section 8.1 “Requirements for Monitoring”: “...The SEA Directive and the SEA Planning Regulations do not prescribe in detail how monitoring should be carried out or documented. Such flexibility is essential, because the scope, depth and method of monitoring will depend very much on the type of plan being monitored. Existing monitoring arrangements (for example, regular monitoring of air and water quality indicators by the Environmental Protection Agency) should be used where possible....”

The cited EPA guidance document “Strategic environmental assessment (SEA) Statements and Monitoring Measures” is a useful document and has been considered alongside other SEA guidance notes from the EPA and others in the undertaking of the SEA.

The submission recommendation to link the indicators back to environmental effects outlined in Table 8.3 and proposed mitigation measures outlined in Table 9.1 has merit and in response I recommend inserting the following text in a footnote at SEA Environmental Report Table 10.1 “Indicators, Targets, Sources and Remedial Action”:

“Indicators are linked to and should be considered alongside the environmental effects outlined in Table 8.3 and proposed mitigation measures outlined in Table 9.1”.

The measures in the monitoring programme encompass many of the issues referred to in the submission and can be expanded upon for clarity. I recommend inserting the following text in a footnote at SEA Environmental Report Table 10.1 “Indicators, Targets, Sources and Remedial Action”:

“Including confirmation with development management that the following impacts have been considered and including use of monitoring data, where available: habitat loss; disturbance (e.g. due to noise and lighting along transport corridors, such as along the Boyne River and Grand Canal)’ and ‘displacement of protected species such as birds and bats.”

I recommend updating the text at section 10.4 of the SEA Environmental Report regarding the monitoring reporting frequency as follows:

“A stand-alone Monitoring Report on the significant environmental effects of implementing the Plan will be prepared in advance of the beginning of the review of the Plan. Monitoring frequencies of indicators tend to change although where they are consistent frequencies are identified.”

I recommend updating the source in Table 10.1 of the SEA as follows:

~~“Department of Culture, Heritage and the Gaeltacht National Monitoring Report for the Birds Directive under Article 12 (every 3 years)”~~ Department of Housing, Local Government and Heritage National Monitoring Report for the Birds Directive under Article 12 (every 6 years)”

In addition, I recommend adding the following text regarding methodology to Section 10.4 “Introduction”:

“The methodology for monitoring set out below will be undertaken by the Council. Where monitoring beyond existing sources is to be undertaken, it is recommended that industry standard methods are used where they exist and where appropriate.”

8. The Built Heritage Policies in Chapter 4 of the Draft LAP including Policies BHP-01, BHP-02 and BHP-03 provide specific guidance with regard to the protection of architectural heritage. In addition, these policies are further strengthened by the objectives contained within Chapter 10 of the Offaly County Development Plan 2021-2027.

No specific guidance is currently available on the preparation and incorporation of character assessments into a statutory plan and therefore the preparation of such a plan into the Edenderry LAP is considered premature until such time as Departmental Guidelines are available on the matter. Build Heritage Policies contained in all statutory plans are reviewed by the County Architect and are considered appropriate in this regard. I therefore recommend no changes to the Draft Edenderry LAP in relation to this point of the submission.

### 3.2.4 Biodiversity and Climate

**Ref: ELAP-D-15**

**Person / Body:**

**An Taisce**

**Summary of submissions / observations:**

The subject submission sets out the benefits of clean water and SuDs ponds in the provision of significant biodiversity value. A number of recommendations are put forward:

1. Incorporate the creation of new ponds, the resurrection of 'ghost ponds' (a 'ghost pond' is an old pond lost to in-filling) and the maintenance of existing ponds, including currently unmanaged ponds as an objective within the LAP.
2. Establish a minimum of one new freshwater pond in Edenderry (ponds can range between one metre squared up to five hectares in area and need to contain water for a minimum of four months of the year).
3. Incorporation of clean, freshwater ponds into public amenity and green space areas as biodiversity enhancement and climate change mitigation measures.
4. Promote community group engagement in pond creation/management and monitoring of local ponds on public land e.g. adopt a pond scheme, whereby local communities take responsibility for some of the management and monitoring of their local pond, under supervision from the local authority.
5. Encourage the development of a strategy for the ongoing monitoring and management of ponds.

**CE Response:**

1. Chapter 6 of the Draft Edenderry Local Area Plan – Biodiversity and Green Infrastructure – and specifically section 6.7 addresses “Constructed wetlands and Community Ponds” and the provision of ponds within the LAP Area. Section 6.7 reads as follows:

*“There is considerable potential to develop wetlands near the rivers that flow through the Plan Area to provide extra water storage in the countryside, habitat for wildlife and help reduce flood risk. Wetlands have been shown to be effective at removing pollutants from water and can double up as nature reserves as they attract a range of wildlife species. In addition, constructed wetlands can be used in the treatment of polluted water which otherwise may contaminate a local watercourse. They can be used where water treatment has not been fully effective, for a variety of reasons, (e.g., where tertiary treatment is not available) and can ‘polish’ the water by removing contaminants. Small ponds can also be crucial habitats for a range of wildlife from dragonflies and water hens to frogs and newts. These in turn, support other species of wildlife such as grey heron, otters and bats. Figure 6.13 below shows a number of specific areas where wetlands could potentially be developed during the life of this Plan.”*

Section 6.6 – Sustainable Urban Drainage Systems (SuDS) also identifies the provision of ponds for the filtration of water and the various formats in which they can take within different

circumstances. Objective BGIO-05 is considered to be sufficiently flexible to allow ponds to be developed across the Plan area and reads as follows:

*“In conjunction with the appropriate prescribed bodies, to investigate the feasibility of providing Wetland Amenity Area at locations shown on Figure 6.13 taking into account the environmental sensitivities of the site and Inland Fisheries Guidance document, Planning for Watercourses in the Urban Environment.”*

I therefore recommend no alterations to the draft LAP on foot of this element of the submission.

2. Figure 6.13 of the Draft Edenderry LAP identify a number of areas within the plan boundary that are suitable for the provision of wetlands and which could take the form of a pond as identified by An Taisce, or wetlands. It is the intention of each objective contained within the LAP to be implemented within the lifetime of the LAP 2023-2029. I therefore recommend no changes to the LAP on foot of this point of the submission.
3. DMS-21 – Public Open Space, contained within chapter 13 of the County Development Plan 2021-2027 refers to wetland areas within residential developments and to be retained, protected and incorporated within the provided open space as appropriate. Furthermore DMS-22 – Green Infrastructure Masterplan requires a Green infrastructure Masterplan for all residential developments of 20 units or more to include consideration of wetlands and SuDs systems which include ponds.

DMS-31 – Residential Energy Efficiency and Climate Change Adaptation Design Statement requires a statement for residential development in excess of 10 residential units, similarly DMS-60 and DMS-74 requires a similar statement for retail developments and Industrial/warehousing developments in excess of 1,000sqm.

In addition to the above objectives, which are considered to provide a sound basis for the incorporation of wetlands and ponds into public spaces that will enhance biodiversity and provide additional climate change measures, I propose to insert an additional objective BGIO-06 to read as follows:

***BGIO-06: Incorporate clean freshwater ponds into public open spaces where appropriate and subject to resources as both biodiversity enhancement and climate change mitigation measures.***

4. To allow for greater community participation with regard to the provision of pond infrastructure in the Plan area and in response to this point of the submission I propose to add the following text to Objective BGIO-05:  
*In conjunction with the appropriate prescribed bodies **and local community groups**, to investigate the feasibility of providing Wetland Amenity Area at locations shown on Figure 6.13 taking into account the environmental sensitivities of the site and Inland Fisheries Guidance document, Planning for Watercourses in the Urban Environment.*
5. In response to this element of the submission, I acknowledge the benefits of providing wetlands as both an amenity feature within an urban setting as well as the carbon sink

function that it can fulfil. To allow for appropriate ongoing management of ponds and wetlands I propose to further amend Objective BGIO-06 as follows:

*In conjunction with the appropriate prescribed bodies and local community groups, to investigate the feasibility of providing Wetland Amenity Area at locations shown on Figure 6.13 taking into account the environmental sensitivities of the site and Inland Fisheries Guidance document, Planning for Watercourses in the Urban Environment and to develop a strategy for the ongoing monitoring and management of ponds and wetland areas as appropriate, subject to resources.*

### 3.2.5 Utilities

**Ref: ELAP-D-26**

**Person / Body:**

**Irish Water**

**Summary of submissions / observations:**

This submission relates to Irish Water plans, programmes and policies and welcomes the objectives and policies in Chapter 9 of the Draft LAP that will assist with the sustainable management of water and wastewater in line with regional and national planning objectives, which is fully supported by Irish Water.

1. The Irish Water submission refers to Chapter 10 of the Regional Spatial and Economic Strategy for the Midlands and Eastern Region in relation to the sustainable management of water.
2. The National Water Resources Plan for the Eastern and Midlands Region have both now been adopted with a three-pillar approach – lose less, use less and supply smarter.
3. There is no change to the Water supply capacity register since the publication of the Draft LAP for Edenderry. Domestic customers will receive priority in terms of availability of water and non-domestic customers are encouraged to maximise efficiencies in their water requirements.
4. The Edenderry Waste Water Treatment Plant currently has no capacity for new connections with a feasibility study for improvement works to be completed in Q2 – 2023. Alternative solutions such as private wastewater treatment plants should not generally be considered. Constraints in the sewer network is also identified in some areas. A Drainage Area Plan is to be undertaken for Edenderry identifying constraints but sufficient capacity currently exists and site specific upgrades may be undertaken where appropriate. The discharge of additional surface water to combined sewers is not permitted.
5. Any development in the vicinity of Irish Water assets should be in accordance with appropriate standard details and codes of practice. Early engagement is requested for any planned road and public realm projects.
6. The inclusion of the objective to remove the water tower from Blundell Park (Objective TCP-14 of the Draft LAP) could be detrimental to the service provided to current and future customers and would have a negative impact on Irish Water’s ability to support growth in the area.
7. Irish Water welcomes the inclusion of policies and objectives supporting the implementation of SuDs and the enhancement of green and blue infrastructure.
8. The estimated cost in reference to the treatment plant as contained in Table 10.4 should be deleted and insert N/A or unknown.

**CE Response:**

1. The Draft Local Area Plan is informed by Project Ireland 2040 and the Regional Spatial and Economic Strategy for the Eastern and Midland Region. Appropriate policies and objectives are included in the Offaly County Development Plan 2021-2027 and in the Edenderry Draft LAP 2023-2029 to ensure the sustainable management of water in accordance with Irish

Water requirements. I therefore do not recommend any changes to the Draft Plan based on this point of the submission.

2. Noted. The Edenderry Draft LAP is considered to support these plans as supported by Policy CIP-06 and associated policies and objectives contained in the Offaly County Development Plan.
3. Noted. I propose to amend Policy Objective CIP-06 with the following text to strengthen the emphasis on the need for non-domestic customers to maximise efficiencies in terms of water usage:  
*"CIP-06: Ensure that adequate and appropriate water services infrastructure is provided in accordance with the requirements of Irish Water and as part of new development proposals and to ensure non-domestic development proposals maximise efficiencies in their water requirements."*
4. Noted. The capacity of wastewater treatment in the town is of the utmost priority and is an ongoing consideration in relation strategic planning for Edenderry. Capacity constraints have informed the Draft Plan and are appropriately incorporated into the land use zonings, policies and objectives of Edenderry LAP 2023-2029. Section 9.3.2 of the draft Plan specifically refers to required wastewater treatment upgrades.
5. Noted. All new developments and water services infrastructure will be implemented as per Irish Water requirements and Policy CIP-06 of the Draft LAP and Policy WSP-02 of the Offaly County Development Plan 2021-2027.
6. The objective to remove the water tower from Blundell Park arose from investigations and analysis done as part of the Blundell Masterplan. The context for the objective is the visual impact of the water tower and attached telecommunications infrastructure on the surrounding area. Any alterations or relocation of existing water infrastructure will be undertaken in consultation and through full agreement with Irish Water. I therefore propose to amend Policy TCP-14 as follows:  
*TCP-14: Support the carrying out of a feasibility study for the removal of the water tower at Blundell Park in consultation with Irish Water.*
7. Noted.
8. National Policy objective (NPO) 72b of the National Planning Framework sets out the following:  
*When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.*

Proposed costs were included on foot of this requirement, however based on the request by Irish Water related to the prematurity of stating the cost of the proposed treatment plant upgrade. I therefore recommend amending Table 10.4 as follows:

Table 10.4 Required Infrastructure

Required Infrastructure	Delivery Schedule	Estimated Cost	Funding Source
<b>Roads and Transportation</b>			
<b>Edenderry Inner Relief Road</b>	Short Term	€5 million	Department of Transport Specific Improvement Grant
<b>Monasteroris (R441) Road widening</b>	Medium Term	€1 million	Department of Transport Specific Improvement Grant
<b>Rathmore Outer Relief (R441 to R402 link)</b>	Long Term	€12 million	Department of Transport Strategic Improvement Grant and Development Contribution
<b>Grand Canal Spur Footway/Cycleway Bridge</b>	On-going	€2m	National Transport Authority
<b>Environment and Water Services</b>			
<b>Wastewater Treatment Plant Upgrade</b>	Medium Term	<del>€7.5 million</del> Unknown by Irish Water at time of writing	Responsibility of Irish Water
<b>Drainage/SuDS</b>			
<b>Provision of wetland/swales at locations outlined in Figure 6.13 Potential Green Infrastructure Projects</b>	On going	€180,000	Development contribution and Irish Water.

### 3.2.6 Transportation

#### Ref: ELAP-D-03

##### Person / Body:

TII

##### Summary of submissions / observations:

TII has no specific observations.

##### CE Response:

I recommend no changes to the draft LAP on foot of this submission.

#### Ref: ELAP-D-14

##### Person / Body:

##### National Transport Authority (NTA)

##### Summary of submissions / observations:

1. The NTA supports the evidence based approach to Local Transport Planning and is of the view the Draft Local Area Plan provides a firm basis for the sustainable development of Edenderry.
2. The NTA states that there is significant lands zoned for Enterprise and Employment across a large discontinuous number of sites. The NTA seeks an economic rationale for the extent of zoning and the local or strategic function of the proposed zoning.
3. Objective TCO-01 could be strengthened by the inclusion of sustainable transport as a consideration in the assessment of retail development.
4. The NTA recommends that the mode split data presented in the draft plan at Table 9.1 is reviewed to provide greater clarity.
5. Objective CIO-06 should be amended in the context of sustainable travel and the National Sustainable Mobility Policy which supports roadspace reallocation without reference to providing relief roads or alternative routes.  
The NTA requests the following amendment to Objective CIO-06: 'To reallocate corresponding roadspace within Edenderry to walking, cycling and public transport to accompany / occur concurrently with the provision of additional roadspace capacity under CIO-05. This may take the form of removing traffic from streets, removing lanes of traffic, narrowing carriageways, traffic management measures, or removing on-street parking to provide cycle tracks or widened footpaths'.
6. NTA recommend that "Reduce the Impact of Congestion" should be added the outset of the Local Transport Plan.
7. "Through traffic calming measures" should be removed from second objective of LTP to avoid elevating one means of improving traffic safety above others.
8. The third objective should also be reviewed.
9. A map of all transport options should be provided.

10. A comparison of in text or map format of the NTA Draft Cycle Network and the Local Transport Plan would be a useful addition
11. The LTP should include a full network of maps for each mode with the text list of LTP proposals
12. The infrastructure map would benefit from being annotated with the code(objective number) given to each measure in the text
13. Consultation with the NTA should be referenced in PP1 – Enhancement of existing bus stops on JKL Street
14. Additional clarity on the Inner/Outer relief route is required in both text and map format, particularly the route to the west of the town.

#### CE Response:

1. Noted
2. It is noted that the subject lands zoned “Enterprise and Employment” are reduced from what was previously zoned in the previous Edenderry Local Area Plan 2017 - 2023. The quantum of land is considered necessary to provide adequate land options for employment generating uses in proximity to the town centre. Sustainable modes of transport will serve the subject lands. There are no undeveloped large areas of land available within the central core of the town that would lend themselves for the use of campus style use.

Project Ireland 2040, The National Planning Framework lists the development of a strong economy supported by enterprise, innovation and skills as a National Strategic Outcome. This will depend on creating places that foster enterprise and innovation and attract investment and talent.

It is noted that Edenderry is designated a ‘Self Sustaining Town’ in Table 2.5; Settlement Hierarchy of the Offaly County Development Plan 2021-2027, due to its function as;

*‘These towns support the regional driver role of Tullamore, and act as important local drivers providing a range of functions for their resident population and their surrounding catchments including housing, employment, services, retail and leisure opportunities. These towns have experienced rapid population growth with high levels of commuter focused residential expansion without equivalent increase in jobs and services. They require consolidation and targeted ‘catch up’ investment in services, infrastructure, suitable transport options, amenities and local employment whilst balancing housing delivery and focusing on consolidation to become more self-sustaining.’*

One of the key enablers in attracting potential investment and employment to Edenderry, a town that has recently experienced a high level of outwards commuting, is the availability of appropriately zoned lands. This Plan takes an asset-based approach in establishing an overall economic growth strategy for Edenderry, identifying and building on a combination of economic, natural and built assets and opportunities, guiding enterprise and employment development to appropriate locations with the necessary infrastructure in place.

Based on the priorities of the Midlands Regional Enterprise Plan to 2024 (published 2022), the LAP intends for the future economic development of Edenderry to be future-focused and centred around the following priorities;

- Transition to a zero carbon town; and

- The establishment of large scale employment bases within the technology sphere within the town to reduce outward commuting on a daily basis.

It is noted that the OPR submission Ref ELAP-D-29 states

The RSES identifies the requirement for Edenderry to generate 'catch up' investment in local employment and services in order to become more self-sustaining. It is noted that economic development and employment within Edenderry has failed to match the rapid population growth over the past number of years, therefore it is essential the measures are included in the draft LAP to support the economic growth of the town.

Accordingly, I consider that there is economic rationale for the zoning of the subject lands as set out in the Draft LAP however, in response to the OPW submission Ref ELAP-D-17, I recommend removing parcels of zoned Enterprise and Employment zoned land based on flooding considerations.

3. In response to the NTA submission I propose to amend Objective TCO-01 to read as follows:

*Assess retail development outside the Core Retail Areas of Edenderry in accordance with Town Centre First principles, the Offaly County Development Plan, Chapter 4 'Retailing and Development Management' of the Retail Planning Guidelines (DECLG, 2012), and the manner in which the development meets sustainable transport objectives.*

4. Mode Share Targets

#### Work Trips

Table 9.1 within *Chapter 9 Critical Infrastructure* of the draft LAP comes from the table within *Section 2.3 Baselines & Future Ambitions* of the draft LTP (page 66).

Table 9.1 Edenderry Modal Share Baseline and Ambitions for Work and Education

Mode Share for Work Trips	2016 Baseline	Minimum Ambition 2029
Car	77%	70%
Public Transport	3.2%	6%
Walking	12.5%	15%
Cycling	1.6%	5%

- The 2016 Baseline in Table 9.1 of the Draft LAP adds up to 94.3%
- The Minimum Ambition 2029 in Table 9.1 of the Draft LAP adds up to 96%

A review of the POWSCAR data (derived from Census 2016) underpinning the bar chart on page 66 of the draft LTP indicate the following breakdown for 2016 including a breakdown of private vehicle trips to Car/Van/HGV or the second half of the table shows Car/Van/HGV trips under a single trip type.

Mode Share for Work Trips	Number	2016 Baseline %
Car (Driver or Passenger)	519	54.2%
Van	54	5.6%
HGV	2	0.2%
Public Transport	6	0.6%
Walking	334	34.9%
Cycling	42	4.4%
Total	957	100%
Mode Share for Work Trips	Number	2016 Baseline %
Car (Driver or Passenger), Van, HGV	575	60.1%
Public Transport	6	0.6%
Walking	334	34.9%
Cycling	42	4.4%
Total	957	100%

Above figures are the corrected baseline numbers.

I therefore recommend alterations to Table 9.1 as follows:

**Table 9.1 Edenderry Modal Share Baseline and Ambitions for Work and Education**

Mode Share for Work Trips	2016 Baseline	Minimum Ambition 2029
Car (Driver or Passenger) including Van and HGV	<del>77%</del> 60.1%	<del>70%</del> 49%
Public Transport	<del>3.2%</del> 0.6%	<del>6%</del> 1%
Walking	<del>12.5%</del> 34.9%	<del>15%</del> 40%
Cycling	<del>1.6%</del> 4.4%	<del>5%</del> 10%

### Education Trips

Table 9.2 within *Chapter 9 Critical Infrastructure* of the draft LAP comes from the table within *Section 2.3 Baselines & Future Ambitions* of the draft LTP (page 66) as follows.

Mode Share for Education Trips	2016 Baseline	Minimum Ambition 2029
Car	31.5%	25%
Public Transport	5.4%	6%
Walking	25.1%	30%
Cycling	0.7%	5%

- The 2016 Baseline in Table 9.2 of the Draft LAP adds up to 62.7%
- The Minimum Ambition 2029 in Table 9.2 of the Draft LAP adds up to 66%

A review of the POWSCAR data (derived from Census 2016) underpinning the bar chart on page 66 of the Draft LTP indicate the following breakdown for 2016.

Mode Share for Educational Trips	Number	2016 Baseline %
Car	767	52.8%
Public Transport	60	4.1%
Walking	602	41.4%
Cycling	24	1.7%
Total	1,463	100%

I therefore recommend to amend Table 9.1 of the Draft LAP as follows:

Mode Share for Education Trips	2016 Baseline	Minimum Ambition 2029
Car (Driver or Passenger) including Van and HGV	<del>31.5%</del> 52.8%	<del>25%</del> 40%
Public Transport	<del>5.4%</del> 4.1%	<del>6%</del> 5%
Walking	<del>25.1%</del> 41.4%	<del>30%</del> 50%
Cycling	<del>0.7%</del> 1.7%	<del>5%</del> 5%

Above figure are corrected baseline with amended modal share targets.

5. No objection to change proposed by NTA.

Note that while the provision of new inner relief roads (as CIO-05) will aid road space re-allocation, it is not contingent on it. I propose to amend Objective CIO-06 as follows:

**CIO-06** To reallocate corresponding roadspace within Edenderry to walking, cycling and public transport ~~to accompany / occur concurrently with the provision of additional roadspace capacity under CIO-05.~~ This may take the form of removing traffic from streets, removing

lanes of traffic, narrowing carriageways, traffic management measures, or removing on-street parking to provide cycle tracks or widened footpaths.

6. The following provides a direct response to each comment from the NTA as it relates to the proposal.

NTA Comment:

*The first objective of the LTP over-emphasises congestion as a driver of transport planning and suggests a solution at the outset which should not form part of an objective. As such, this text should be removed and replaced with the following:*

- *Reduce the impact of congestion;*

CE Response:

I recommend updating first objective of the LTP under Section 2.2 as follows:

~~Alleviate congestion~~ *Reduce the impact of congestion along the main thoroughfare through provision of inner relief routes;*

NTA Comment:

*Similarly, the solution part of the second objective “through traffic calming measures” should be removed. There are many approaches for improving road safety for vulnerable road users (traffic reduction, new crossings, improved cycle infrastructure etc.) and to highlight one above others, in particular as an objective, is inappropriate;*

CE Response:

I recommend updating the second objective of the LTP under Section 2.2 as follows:

*Improve vulnerable road user safety* ~~through traffic calming measures;~~

NTA Comment:

*The third objective should be reviewed in a similar manner, as roadspace reallocation is a specific measure which is covered under the 4<sup>th</sup>, 5<sup>th</sup> and 6<sup>th</sup> objectives;*

CE Response:

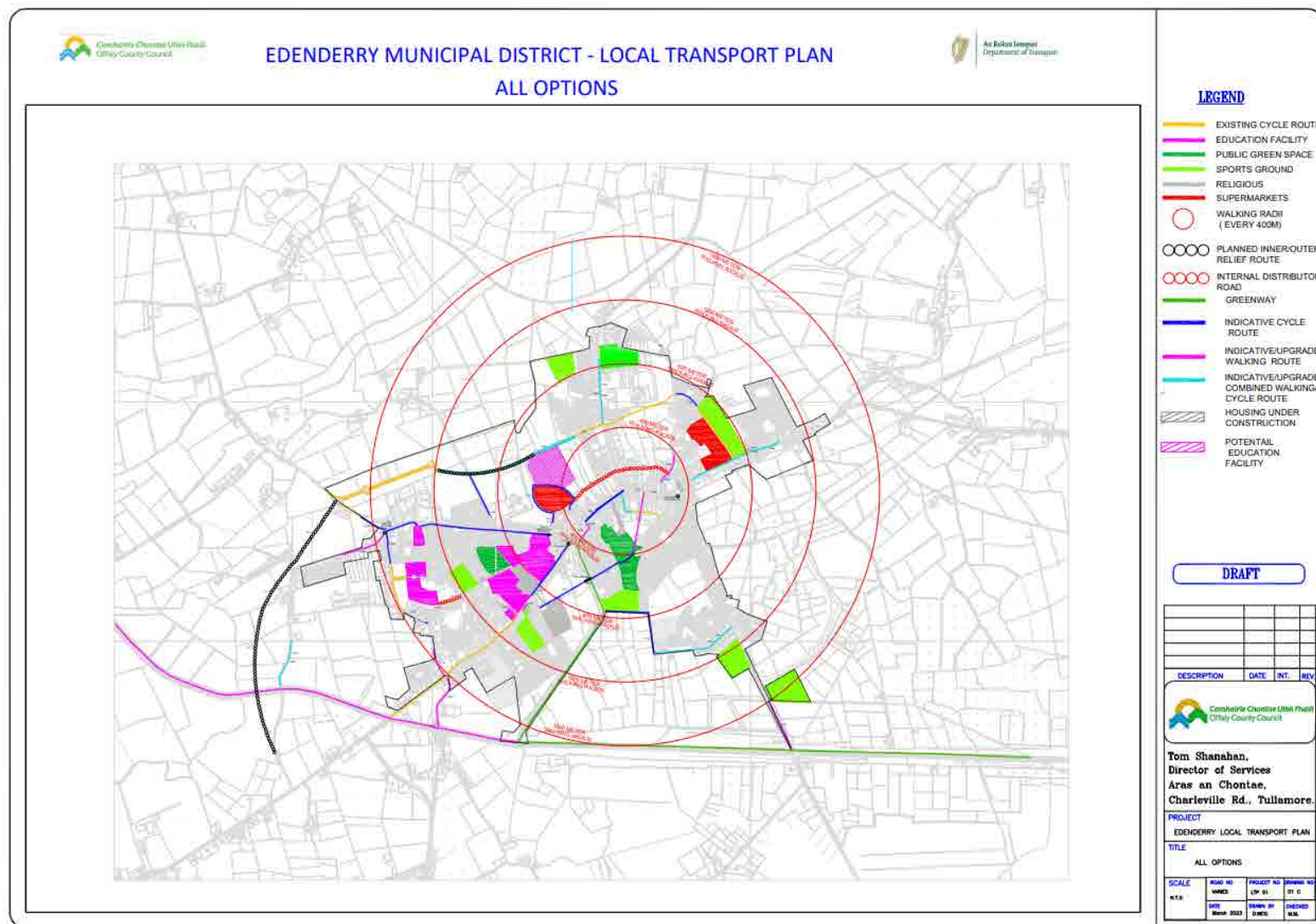
The current third objective “Assess the road network, identify where additional space can be reallocated to pedestrians and cyclists, and develop schemes to reallocate space to active modes” sets a clear pro-active objective consistent with Climate Action Plan which calls for “LA’s to identify roads and streets suitable for road space reallocation”. DoT Letter dated 14<sup>th</sup> October 2022 re-emphasises this obligation. Accordingly this merits this objectives continued inclusion and I do not recommend any alterations to the Draft Plan on foot of this point of the submission.

NTA Comment:

*A map of all of the options should be provided;*

CE Response:

I recommend updating the LTP to include an All Options Map at Appendix D that illustrates all options proposed. The All Options map is shown below.



Appendix D of Local Transport Plan – All Options Map

NTA Comment:

*Section 1.2.7 refers to the Draft National Cycle Network (NCN) as published by the NTA having been further developed during the preparation of the LTP. A comparison of the LTP and NCN, in text or map form, would be a useful addition to the LTP;*

CE Response:

Appendix C of the LTP provides the most up to date representation of the Draft NCN (Edenderry Sections) at time of consultation.

NTA Comment:

*The LTP should include full network maps for each mode with the text list of LTP proposals;*

CE Response:

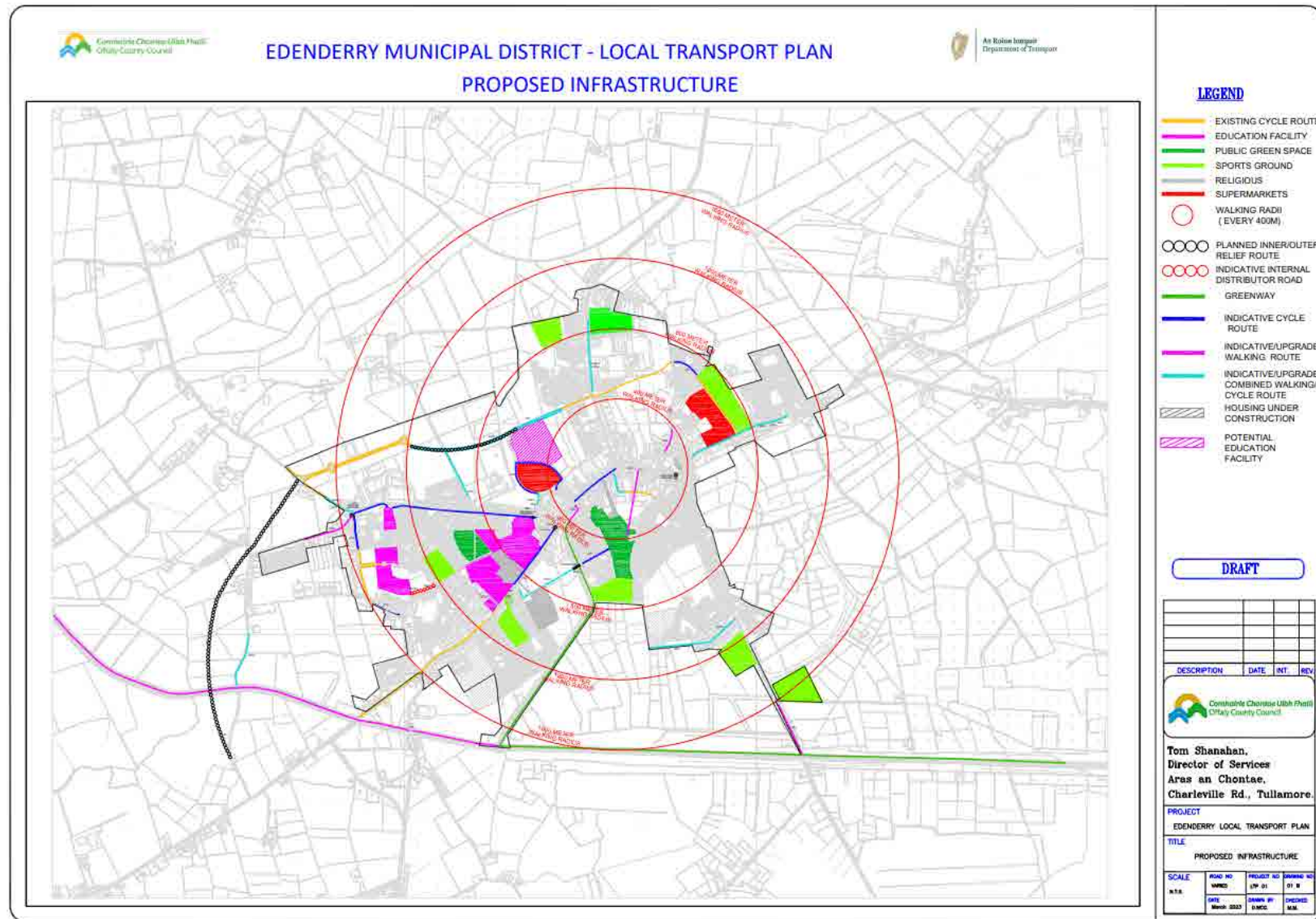
The LTP Appendices provide high level maps, with proposals listed in Chapter 4 of that document. This is considered appropriate to address the requirements for listing and mapping the LTP proposals.

NTA Comment:

*The proposed infrastructure map would benefit from being annotated with the code given to each measure in the text;*

CE Response:

I recommend the proposed infrastructure map at Appendix B of the LTP is updated to include codes assigned to each proposed piece of infrastructure. The updated map is shown below.



Appendix B of Local Transport Plan – Proposed Infrastructure Map

NTA Comment:

*Reference to consultation with the NTA should be included in PP1 – Enhancement of Existing Bus Stops on JKL Street;*

CE Response:

I recommend updating PP1 in Section 4.6 of the LTP as follows:

**PP1 Enhancement of Existing Bus Stops on JKL Street**

*Feasibility: High*

*Delivery Timeframe: Medium*

*Reasoning: Cross section available to develop good quality bus stops in the vicinity of the proposed Edenderry Library. Consultation to take place with NTA on enhancement of existing bus stops on JKL Street. An upgrade would ensure that bus stops comply with relevant accessibility standards and facilitate high quality bus shelters to make public transport more attractive.*

NTA Comment:

*Clarity on the Inner/Outer Relief route (as per map in Appendix B) and RP1 (as per text) is required. The definition of these routes is unclear, in particular the route to the west of the town, which appears in the map but not in the text. This is of increased importance in the context of Objective CIO-6 referenced above.*

CE Response:

The Edenderry Inner Relief Road (Phase 2), as RP1, is shown within Appendix B Proposed Infrastructure drawing. This project has planning approval, and is being advanced in consultation with the Department of Transport. The definition of this route is as per the aforementioned drawing. The indicative line of the approved, but not yet constructed, phase 2 of the inner relief road is amended on the Proposed Infrastructure Map at appendix B of the LTP and on the proposed zoning map to more accurately reflect the approved alignment of this road.

The potential Outer Relief road is outlined in R11, and illustrated in notional form within Appendix B Proposed Infrastructure drawing. R11 seeks to examine the potential of this south-western link, however as the feasibility is currently deemed “Low”, it has not been brought forward to “Proposal” status, i.e. does not feature as an RP within the draft LTP. The route for this link, as shown on Proposed Infrastructure drawing, is indicative only. I therefore recommend no further alterations to the Draft LAP on foot of this point of the submission.

**Ref: ELAP-D-23****Person / Body:****Edenderry GAA****Summary of submissions / observations:**

This submission relates to the Edenderry GAA grounds to the north of Edenderry Town. The submission is primarily concerned with the Draft Local Transport Plan and the Objectives and Policies that relate to the GAA grounds.

In order to facilitate safe access to the GAA grounds, particularly for children, the submission supports the planned transport options and reallocation of road space within Edenderry to walking and cycling. WP12 is supported to improve the footway along the R401 that links to the Edenderry GAA grounds.

WCP12 is also cautiously welcomed in the context of improved connectivity, particularly to the new school site. Lighting and surveillance of this area is a concern due to recent anti-social activity in the vicinity of the new astro pitch at the GAA grounds. Edenderry GAA would welcome input into the design process for any such link.

**CE Response:**

Support for the policies and objectives of the Draft Local Area Plan are noted and welcomed. The two proposals specifically mentioned and supported within the submission are noted below:

*'WCP12 Create footway/cycleway link from Edenderry GAA southward to L-1028-2*

*Feasibility: High*

*Delivery Timeframe: Medium*

*Reasoning: Provision of a new walking/ cycling route from the GAA Sports Campus, linking south to the Inner Relief Active Travel Infrastructure Loop (footways & cycleways) would enable safer user access. This also provides an alternative corridor, other than the R401 which is limited in width for Active Travel infrastructure provision, particular limited in space for segregated cycle-ways. The GAA has a significant number of young users who will be enabled to walk and cycle to the ground independently with safer infrastructure links. This link will also provide improve active travel links to the Ard Na Carraige residential area.'*

*'WP12 Improve Footways along the R401 from junction with Inner Relief to Edenderry GAA*

*Feasibility: High*

*Delivery Timeframe: Medium*

*Reasoning: Existing footway is in poor condition in places, with localised flooding occurring. Targeted improvement will improve walkability on this route.'*

The Local Authority welcomes support for these policies. Other options and associated reference numbers referred to were primarily options and were ultimately translated to “proposals” in the final Transport Plan and are therefore not repeated. The input of Edenderry GAA into the design process for any links to and from the GAA grounds is welcomed and invitations will be issued at the appropriate stage of the design process for such infrastructure. I do not propose any alterations to the Draft Edenderry LAP on foot of this submission.

### 3.2.7 Other

**Ref: ELAP-D-30**

**Person / Body:**

**Department of Education**

**Summary of submissions / observations:**

This submission relates to the future requirements of the department of Education in relation to school sites in Edenderry. The following points are presented:

1. The Department notes the submission made in relation to the draft County Development Plan 2021-2027 and acknowledges that there are no identified requirements for school site reservations currently but this will remain under review. This remains the position of the Department and the preference is to expand existing facilities should the need arise. The Department requests that the Planning Authority examine the potential of protecting a land buffer around each of the five primary schools to enable them to expand if necessary.
2. The Department requests the wording in Table 7.2 be amended to reflect the opinion that any potential increase in school place requirements could be met at existing school sites or expansion thereof.
3. Policies in relation to future population increases, including the influx of refugees, working with LOETB and DoES is delivering educational requirements, sites zoned for potential future expansion of schools and to provide for necessary educational facilities are noted and welcomed.
4. The submission notes the site identified in the Edenderry Local Transport Plan for a new Oaklands College campus and that the subject site is identified as being within Flood Zone B and therefore request that the completion of a justification test takes places as soon as possible.
5. The Department notes the dezoning of Community Services/Facilities land to the north east of the town and are mindful of the requirement for adequate and appropriately zoned land should the need arise.
6. The Local Authority's proposals for walking infrastructure (WP-1 in Local Transport Plan) and sustainable travel links is supported by the Department of Education.
7. The Department recognises that certain unforeseen circumstances may necessitate reassessment of school place provision. Special Education Needs are also acknowledged as requiring additional accommodation in the future. The Department will consult with the Council if and when additional accommodation is required within specific locations and notes the critical importance of ensuring sufficient land is zoned for these purposes.

**CE Response:**

1. It is not considered necessary to include buffers around existing schools as the proposed 'Community Services/Facilities' zonings of existing school sites in the town serves this function and allows for expansion where adequate space is available in the context of the existing built environment. It should be noted also that Policy CP-02 in Chapter 7 of the Draft Plan states that it is the policy of the Council to 'support and facilitate improvements to existing primary

and post-primary schools if necessary to facilitate increased population including the influx of refugees in the short-medium term.’

2. I propose to amend Table 7.2 of the Draft Plan to reflect the requested wording from the Department of Education as follows:

**Table 7.2 Assessment of Future Demand & Requirements**

Theme	Land Use	Potential Location	What is required	Delivery Mechanism
<b>Education &amp; Training</b>				
Primary & Post-Primary School Extension	Educational	Dependent on the size and suitability of the existing sites and school agreements. Incomplete hotel site identified for expansion of Oaklands College.	To consider the current refugee situation within Ireland and the potential need for extra education provision that increasing numbers of refugees may bring in the short to medium term, particularly when combined with projected population increases. It may be possible to add some of this level of accommodation onto existing schools but new sites should be identified.	Department of Education
Primary & Post-Primary School New school	Educational	-	Projected population increases will require new Primary or Post-primary school sites for expansion within Plan Period, <b>which may occur on existing school sites where adequate space is available or on a relocated site as appropriate.</b>	-
New Training/Third Level Facilities	Educational	-	While no further training facilities are required over the period of the plan appropriate applications would be considered.	Developer / Offaly County Council / Other

3. The Department of Education comments on these policies and objectives are noted and welcomed.
4. The subject site has been identified for community services/facilities in the draft plan with no planning application received in relation to any particular land use to date. Any application will be subject to a site specific flood risk assessment to determine the suitability of the proposal in terms of flood risk and it is anticipated this will be assessed upon receipt of any relevant application. The following text is inserted under LUZO-09 and under the matrix as a footnote, and is also relevant in response to the DoE submission:

“The Community Services/Facilities land use zoning objective is qualified for Site No. 20 (see Figure 10.1 of PIA) as follows:

This site has the capacity to accommodate a new school in compliance with the Flood Risk Management Guidelines and has therefore been zoned as “Community Services/Facilities”. Any main school buildings (and associated emergency access and egress points) shall be located within Flood Zone C or outside flood zones altogether.

Any school at this site is likely to require infrastructure ancillary to the main school buildings (for example, amenity open space, outdoor sports and recreation and essential facilities such as changing rooms), which can be located at parts of the site within Flood Zones that are at greater risk of flooding.

“Permitted in Principle” / “Open for Consideration” uses under “Community Services/Facilities” shall therefore be limited in areas at elevated risk of flooding at this site, as per the Flood Risk Management Guidelines, as follows:

- In Flood Zone A, uses shall be limited to water compatible uses;
- In Flood Zone B, uses shall be limited to less-vulnerable and water compatible uses (as per the Flood Risk Management Guidelines);

These limitations shall take primacy over any related provision relating to the land use zoning matrix.”

5. To support objectives in relation to compact growth outlined in the NPF and the RSES for the Midlands and Eastern Region, the subject site to the north east of the town was considered surplus to requirements for Community Services/Facilities zoned land during the lifetime of the current plan with adequate land already identified at other more central and connected locations within the town boundary. I therefore do not recommend any alterations to the draft plan on foot of this point of the submission.
6. The Department’s comments in this regard are noted and welcomed.
7. The Department’s comments in relation to unforeseen circumstances and future Special Education Needs are noted by the Council and any future consultation and engagement in this regard would be welcomed. For the purposes of the Edenderry Draft LAP 2023-2029, it is considered that sufficient Community Services/Facilities zoned land is provided to allow for any needs arising in the upcoming 6-year period.

## 4 Miscellaneous Changes

I recommend the following additional alterations to the draft LAP:

1. Replace the Strategic Residential Reserve zoning on the GAA lands identified below to Open Space, Amenity and Recreation zoning based on its use as recreational space by the GAA (as stated in a submission by the GAA on the draft Residential Zoned Land Tax Map). In addition regularise the zoning to the front of two houses to the south from SRR and open space zoning to existing residential, in conjunction with the insertion of the constructed road that serves two houses to the south of the subject GAA lands.

Draft LAP:



Recommended Amendment:



I recommend the following text changes to Table 10.2: Site Appraisals relating to the subject GAA site (site no. 21):



Site No.	Criteria	Recommendation	Justification
21	Promotes compact growth	Zone <del>'Strategic Residential Reserve'</del> <b>Open Space, Recreation and Amenity</b>	Whilst this site is located adjacent to an existing housing development, it is located on the periphery of the town and thus does not promote compact growth. It is considered that there are more suitable sites elsewhere in the plan area that would be more appropriate to zone for residential development. <b>The site is in use by the GAA for recreational purposes.</b>
	Promotes sustainable mobility		
	Availability of infrastructure & Services		
	Physical suitability and accessibility		

	Promotes sustainable mobility		<del>This site can be considered in subsequent Local Area Plans.</del>
	Availability of infrastructure & Services		
	Physical suitability and accessibility		

2. Enlarge the open space zoning at the location depicted below to reflect the additional land along the edge of the newly opened adjoining road.

Draft LAP:



Recommended Amendment:



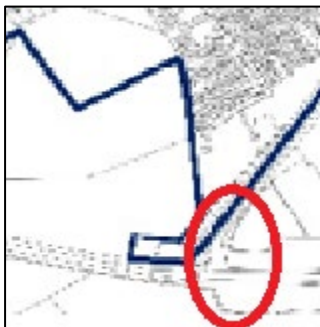
3. All maps in the LAP should be updated to include the newly built roads: Blundell Avenue and a segment of the northern relief road.

4. All maps in the LAP should be updated to include the updated LAP development boundary based on decisions taken on submissions in this CE Report.
5. The following maps require to be updated to reflect the correct development boundary on the zoning objectives map at this location:

Correct boundary that featured on some maps in the draft LAP:



Incorrect boundary that featured on some maps in the draft LAP (a section of the boundary in the red circle was not included), and which should be redrawn to be in accordance with the map above:



This correction to the boundary is recommended to be made to the following maps:

Figure 6.1 Proposed Natural Heritage Areas in Edenderry

Figure 6.2 Landscape Classification

Figure 6.4 Existing Green Infrastructure in Edenderry

Figure 6.7 Significant water bodies in Edenderry

Figure 6.11 Location of existing cemeteries and gardens of remembrance within Plan Area

Figure 6.13 Potential Green Infrastructure projects

Figure 7.7 Existing Social and Community Infrastructure Edenderry

6. The following maps require to be updated to reflect the correct development boundary on the zoning objectives map at this location:

Correct boundary that featured on some maps in the draft LAP:



Incorrect boundary that featured on some maps in the draft LAP (a section of the boundary in the red circle was not included), and which should be redrawn to be in accordance with the map above:



This correction to the boundary at this location is recommended to be made to the following maps:

Figure 6.1 Proposed Natural Heritage Areas in Edenderry

Figure 6.2 Landscape Classification

Figure 6.4 Existing Green Infrastructure in Edenderry

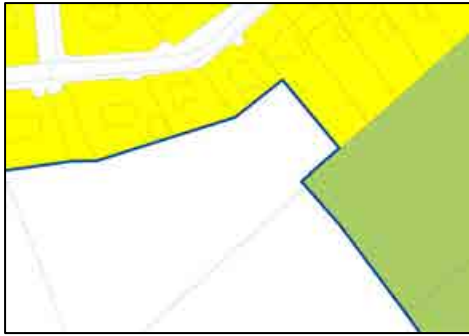
Figure 6.7 Significant water bodies in Edenderry

Figure 6.11 Location of existing cemeteries and gardens of remembrance within Plan Area

Figure 6.13 Potential Green Infrastructure projects

Figure 7.7 Existing Social and Community Infrastructure Edenderry

7. The following maps require to be updated to reflect the correct development boundary at this location:  
Recommended amended boundary:



Incorrect boundary that featured on maps in the draft LAP (a section of the boundary in the red circle was incorrectly drawn), and which should be redrawn to be in accordance with the map above:



This correction to the boundary at this location is recommended to be made to the following maps:

Figure 6.1 Proposed Natural Heritage Areas in Edenderry

Figure 6.2 Landscape Classification

Figure 6.4 Existing Green Infrastructure in Edenderry

Figure 6.7 Significant water bodies in Edenderry

Figure 6.11 Location of existing cemeteries and gardens of remembrance within Plan Area

Figure 6.13 Potential Green Infrastructure projects

Figure 7.7 Existing Social and Community Infrastructure Edenderry

Figure 10.5 Zoning Objectives Map for Plan Area

8. Amend the zoning at St. Francis Street from 'Enterprise and Employment' to 'Existing Residential' to reflect the existing uses on site.

Draft LAP:



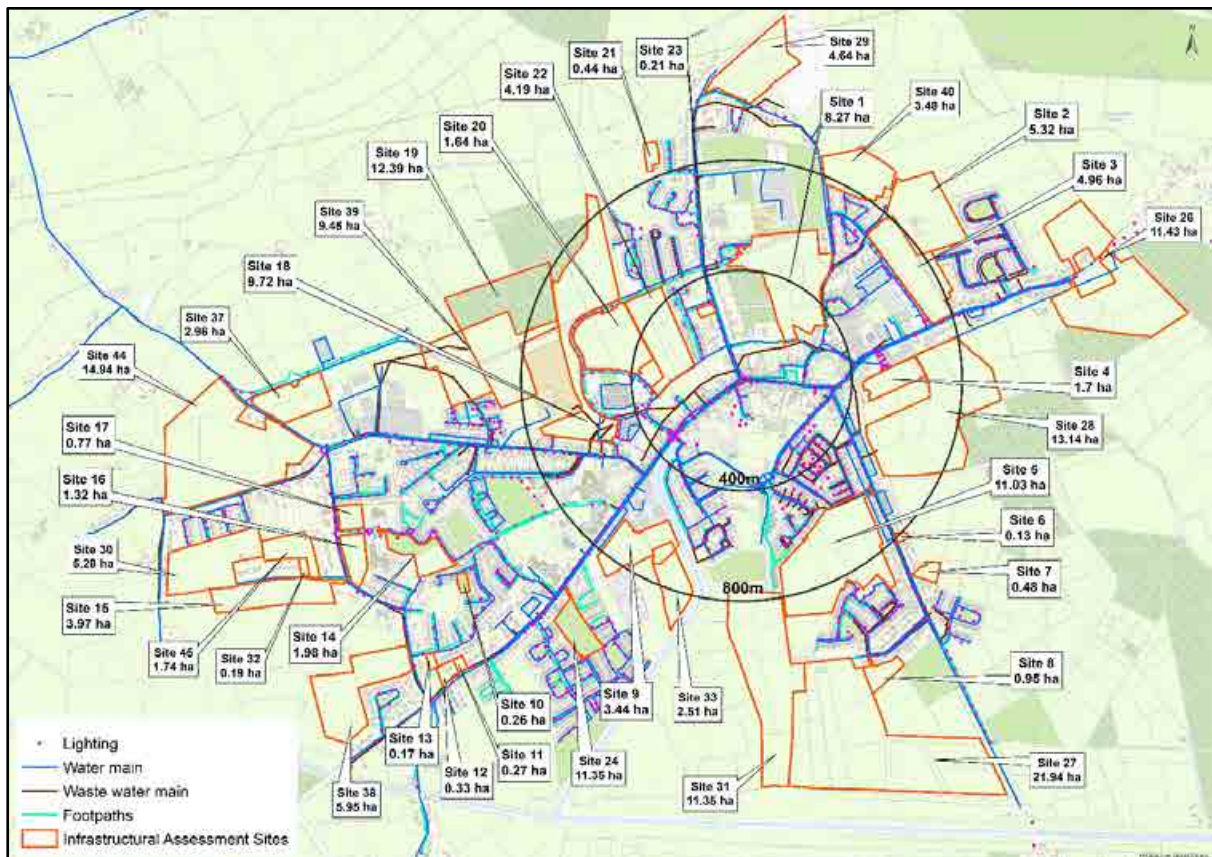
Recommended Amendment:



9. The paragraph numbering in Chapter 12 Implementation and Monitoring should be changed as follows:

11.1, 11.2, 11.3 to 12.1, 12.2, 12.3

10. Include the following map in Chapter 10: Planning and Infrastructural Assessment;



**Figure X: Distance of sites from Edenderry Town Centre overlain with existing infrastructural services**

- 11.

I recommend the following changes to Section 1.4 of the draft LAP based on updates to listed documents:

#### County level:

- Offaly County Development Plan 2021-2027
- Offaly Digital Strategy 2020-2022
- Irish Water Treatment Capacity Register and 10-year Water Supply Capacity Register, 2022
- Offaly Heritage Plan 2023-2027
- Offaly Libraries Interim Development Plan 2022-2023
- Offaly Economic Development Strategy and Action Plan 2022-2027

*Forthcoming documents:*

- ~~Offaly Economic Development Strategy and Action Plan 2022-2027~~
- Local Economic and Community Plan 2022-2027
- Offaly Tourism Strategy 202~~23~~– 202~~67~~
- Age Friendly Strategy for County Offaly 2022-2027
- Offaly Digital Strategy 2023-2025

**Regional level:**

- Regional Enterprise Plan to 2024 Midlands, Government of Ireland; An initiative of the Department of Enterprise, Trade and Employment, 2022
- Midland Regional Food and Drink Strategy 2021-2024, by Midlands Ireland

*Forthcoming document:*

- ~~Regional Tourism Strategy for~~ Ireland's Hidden Heartlands ~~Regional Tourism Development Strategy~~ 202~~23~~-202~~67~~ by Fáilte Ireland

**National level:**

- Documents and Section 28 Guidelines as listed in Chapter 1 of Offaly CDP
- Town Centre First, A Policy Approach for Irish Towns, DRCD, 2022
- Housing for All – A New Housing Plan for Ireland, DHLGH, 2021
- Housing Options for Our Aging Population – Government Policy Statement, 2019
- Age Friendly Principles and Guidelines for the Planning Authority, Age Friendly Ireland, June 2021
- Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas; Water Sensitive Urban Design Best Practice Interim Guidance Document, DHLGH, 2022
- Local Area Plans - Guidelines for Planning Authorities, DECLG, 2013
- Manual for Local Area Plans, DECLG, 2013
- Design Manual for Urban Roads and Streets, update 2020.
- Building for Everyone; A Universal Design Approach, Booklet 9 Planning and Policy, by the Centre for Excellence in Universal Design
- National Smart Specialisation Strategy for Innovation 2022-2027
- Ten Universal Design Features to include in a Lifetime Adaptable and Age Friendly Home, by Age Friendly Ireland, 2021
- Climate Action and the Local Authority Development Plan (OPR Case Study Paper CSP05), 2022
- The Need for UN SDGs, Baseline Data and Vacancy Targets in Local Area Plans (LAPs) for Historic Town Centres, A Report by the CTCHC Programme, The Heritage Council, 2022.
- National Investment Framework for Transport in Ireland, Dept. of Transport, 2022
- National Sustainable Mobility Policy, Dept. of Transport, 2022
- Electric Vehicle Charging Infrastructure Strategy 2022-2025
- **Climate Action Plan 2022, Securing Our Future, Government of Ireland, 2022**

*Forthcoming documents:*

- Places for People – National Policy on Architecture (stated in Town Centre First Policy)

- A National Strategy for People with a Disability (stated in Town Centre First Policy)
- National health check model (stated in Town Centre First Policy)
- ~~Climate Action Plan 2022, Securing Our Future, Government of Ireland, 2022~~

## 5 Procedure Following CE's Report

Where, following the consideration of the draft LAP and this CE's report, it appears to the members of the planning authority that the draft should be accepted or amended, the members may by resolution, accept or amend the draft and make the LAP accordingly. If the proposed amendment would, if made, be a **material alteration** of the draft concerned, the planning authority shall, not later than 3 weeks after the passing of a resolution, publish notice of the proposed alteration in at least one newspaper circulating in its area and send notice and a copy of the proposed alteration to the prescribed authorities.

The planning authority shall determine if a strategic environmental assessment (SEA) or an appropriate assessment (AA) or both such assessments are required to be carried out in respect of the proposed material alteration(s). No later than 2 weeks after this determination, the CE shall specify a period as considered necessary following the passing of the resolution to facilitate the SEA and / or AA. The planning authority shall publish notice of the proposed material alteration, and where appropriate in the circumstances, the making of a determination that an SEA and / or AA is required, in at least one newspaper circulating in its area.

Not later than 8 weeks after publishing notice of the proposed amendment, the CE shall prepare a report on any submissions or observation received and submit the report to the members for their consideration<sup>2</sup>.

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<sup>2</sup> Section 20(3)(k) of the Planning and Development Act 2000 as amended.

## Appendix A: Copy of Public Notice

### **COMHAIRLE CHONTAE UIBH FHAILI** **OFFALY COUNTY COUNCIL**

#### **NOTICE OF DRAFT EDENDERRY LOCAL AREA PLAN 2023-2029**

Notice is hereby given that Offaly County Council, pursuant to Section 20 (3) of the Planning & Development Act 2000 as amended, has made a draft Local Area Plan for Edenderry.

The Local Area Plan is a statutory document that sets out the planning and development objectives for Edenderry and is prepared in accordance with the Planning and Development Act 2000 (as amended).

The draft Edenderry Local Area Plan 2023-2029 (draft LAP) comprises:

- A written statement and a landuse zoning map:
- Strategic Environmental Assessment (SEA) Environmental Report (prepared by the planning authority of the likely significant effects on the environment of implementing the local area plan) in accordance with the SEA Directive (2001/42/EC) and pursuant to the Planning and Development (Strategic Environmental Assessment) Regulations 2004 as amended.
- Appropriate Assessment (AA) Stage 2 Natura Impact Report in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC).
- Strategic Flood Risk Assessment pursuant to section 28 of the Planning and Development Act 2000 (as amended) and the provisions of the Guidelines for Planning Authorities (2009) on The Planning System and Flood Risk Management.

#### **Viewing Locations and Submission Dates**

A copy of the draft LAP may be inspected from 15th December 2022 until 3<sup>rd</sup> February 2023 (both dates inclusive) during normal opening hours (excluding public holidays) at the following locations:

- Planning Section, Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, County Offaly.
- Edenderry Municipal District, Edenderry Town Hall, O'Connell Square, Edenderry, Co. Offaly.
- Edenderry Library, JKL Street, Edenderry, Co. Offaly.
- On the Offaly County Council website at [www.offaly.ie/edenderrylap](http://www.offaly.ie/edenderrylap)

#### **Submissions**

Written submissions or observations with respect to the draft LAP and/or the accompanying reports are invited from members of the public and other interest parties. Submissions or observations must state the name and address of the person or relevant body or agency making it, and should be clearly marked '*Draft Edenderry Local Area Plan 2023-2029*'.

Please make your submission or observation by one medium only to avoid the duplication of submission reference numbers and to streamline the process i.e.:

- On-line at: [www.offaly.ie/edenderrylap](http://www.offaly.ie/edenderrylap) , or

- Hard Copy at: Forward Planning Section, Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, County Offaly.

Submissions or observations shall be made between 15th December 2022 and 3<sup>rd</sup> February 2023 **(both dates inclusive). Please note submissions will be accepted up to 4pm on 3<sup>rd</sup> February 2023. Late submissions will not be accepted.**

Please include your name and address on a separate page to the content of your submission. This is to assist Offaly County Council in complying with the provisions of the Data Protection Act. Your assistance on these issues is appreciated. Emailed submissions will not be accepted. Please note that observations or submissions will be made public on the website.

Children or groups or associations representing the interests of children, are entitled to make submissions or observations.

Submissions should include a map if it refers to particular locations or features. Submissions should be clear and concise. If you need to make a lengthy submission, please attach an executive summary to it. Submissions should preferably be in typed format in the interests of legibility.

All submissions or observations received during the above time period will be taken into consideration before the making of the Edenderry LAP 2023-2029.

Signed: Ann Dillon  
Director of Services  
15<sup>th</sup> December 2022

## Appendix B: List of Persons / Bodies who made submission / observation

The list sets out the submissions received within the statutory timeframe for public consultation under Section 20(3)(b) of the Planning & Development Act 2000 as amended. (31 no.)

Ref. No.	Name of Persons / Bodies
ELAP-D-01	Environmental Protection Agency
ELAP-D-02	Martin Mason
ELAP-D-03	TII
ELAP-D-04	Edenderry Livestock Mart
ELAP-D-05	Sunny Day Property Trading Company Limited
ELAP-D-06	John Mangan
ELAP-D-07	Brendan Foran
ELAP-D-08	Eamonn Dunne and Patrick Gilson
ELAP-D-09	Paula Grehan
ELAP-D-10	Tom Glynn, Firacorn Ltd.
ELAP-D-11	Frank Murray
ELAP-D-12	Cllr. Noel Cribbin
ELAP-D-13	Cllr. Robert McDermott
ELAP-D-14	NTA
ELAP-D-15	An Taisce
ELAP-D-16	Cllr. Robert McDermott
ELAP-D-17	OPW
ELAP-D-18	David Foran
ELAP-D-19	Department of Housing, Local Government and Heritage
ELAP-D-20	Gambara Limited
ELAP-D-21	Donal Foran and Kryan Foran
ELAP-D-22	Newlyn Homes Limited
ELAP-D-23	Edenderry GAA
ELAP-D-24	Christopher Dunne
ELAP-D-25	Declan Conlon
ELAP-D-26	Irish Water
ELAP-D-27	Department of Environment, Climate and Communications
ELAP-D-28	Greypost Development Ltd.
ELAP-D-29	Office of the Planning Regulator
ELAP-D-30	Department of Education
ELAP-D-31	Darren McGill

## Appendix C: Prescribed Authorities that were notified

The notifications were made under Section 20(3)(a) of the Planning & Development Act 2000, as amended, Article 14 of the Planning and Development Regulations 2001, as amended, and Article 14E of the Planning & Development (Strategic Environmental Assessment) Regulations 2004, as amended (21 no.)

<b>Prescribed Authorities</b>
Minister for Housing, Local Government and Heritage
OPR
An Bord Pleanála
The Minister for Media, Tourism, Arts, Culture, Sports and the Gaeltacht
Offaly Local Community Development Committee (OLCDC)
Galway City and County Council
Roscommon County Council
Tipperary County Council
Westmeath County Council
Laois County Council
Kildare County Council
Meath County Council
Irish Water
Department of Environment, Climate and Communications
Department of Agriculture, Food and Marine
Development Applications Unit of Department of Housing, Local Government and Heritage
EPA
Department of Education
TII
NTA
OPW

## Appendix E: Environmental Authorities

Notice was issued to Environmental Authorities under Article 8 (14C) of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) as amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (S.I. 201 of 2011) in relation to SEA Scoping for the preparation of the LAP.

Notice was issued to:

- Meath County Council
- Galway City and County Council
- Kildare County Council
- Laois County Council
- Roscommon County Council
- Tipperary County Council
- Westmeath County Council
- Department of Agriculture, Food and Marine
- Department of Environment, Climate and Communications
- Department of Housing, Local Government and Heritage
- EPA

Submissions were received from:

Name of Environmental Authority
Meath County Council
EPA
Department of Housing, Local Government and Heritage