

Submission on *Draft Offaly County Development Plan 2021-2027* (with regard to lands at Arden Road, Tullamore, Co. Offaly)

Wednesday, 7 October 2020



Prepared for:

The Doorley Family

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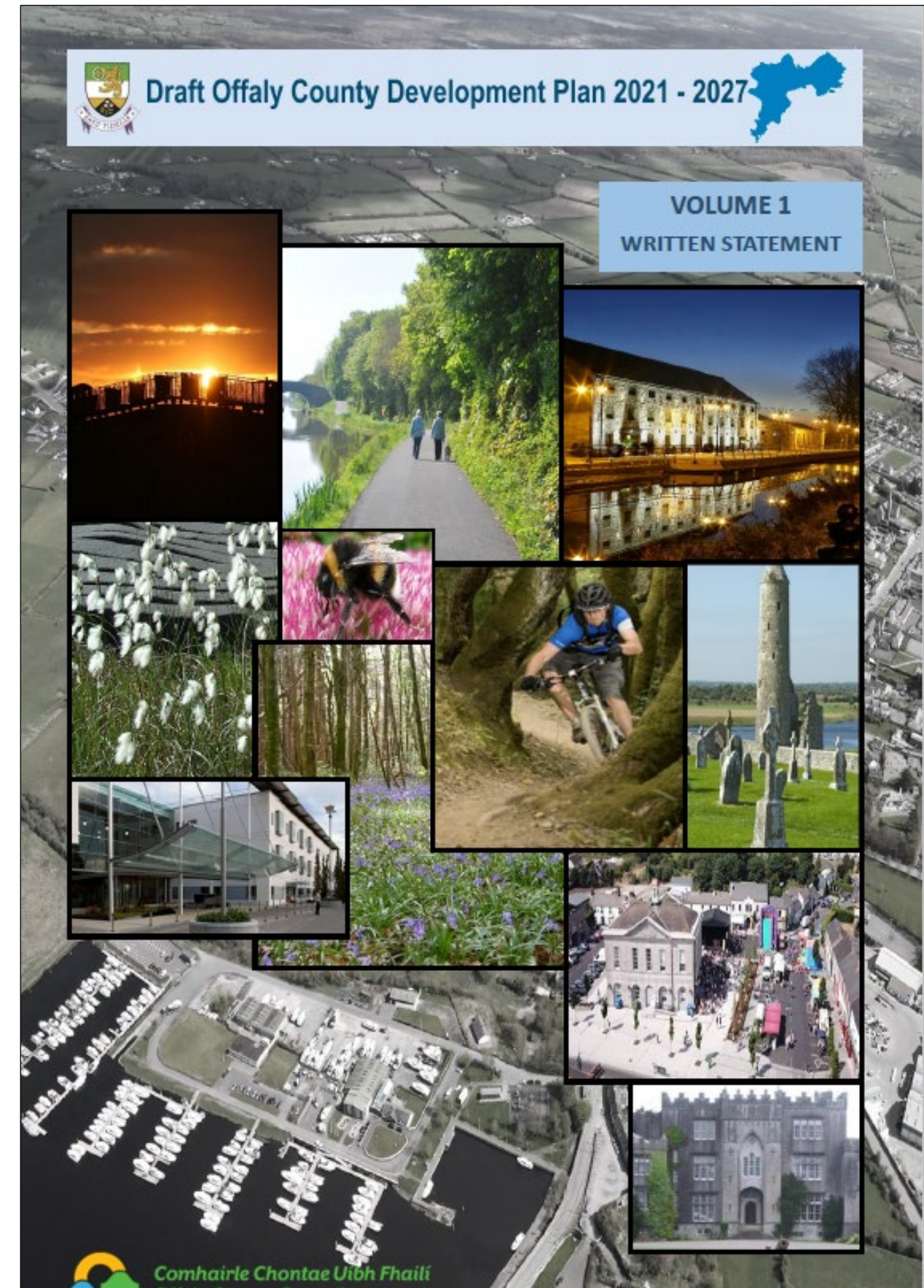
PREAMBLE

“To create a sustainable and competitive county that supports the health and wellbeing of our people and places, from urban to rural, with access to employment opportunities supported by high quality housing and physical, social and community infrastructure for all, in a climate resilient manner and with respect for our biodiversity.”

[Our emphasis.]

(Source: Section 1.5 of *Draft Offaly County Development Plan 2021-2027*)

A ‘New Residential’ zoning objective for the entirety of the subject lands will serve to realise that aim.



Forward Planning Section
Offaly County Council
Áras an Chontae
Charleville Road
Tullamore
Co. Offaly
R35 F893

Wednesday, 7 October 2020
[By Online Submission]

Dear Sir/Madam

RE: SUBMISSION ON THE DRAFT OFFALY COUNTY DEVELOPMENT PLAN 2021-2027

1.0 INTRODUCTION: SUBMISSION TO RETAIN RESIDENTIAL ZONING

1.1 Amendment to Plan Sought: The Context

The Doorley Family¹ has retained Tom Phillips + Associates, Town Planning Consultants², to make a submission in respect of the *Draft Offaly County Development Plan 2021-2027* in relation to their lands known as ‘Arden Lands’, adjacent to Arden Road, Tullamore, Co. Offaly.

The subject lands comprise c. 11.7 hectares (29 acres), located in lands north of Tullamore Town Centre, to the east of Arden Road and north of the junction with Collins Lane.

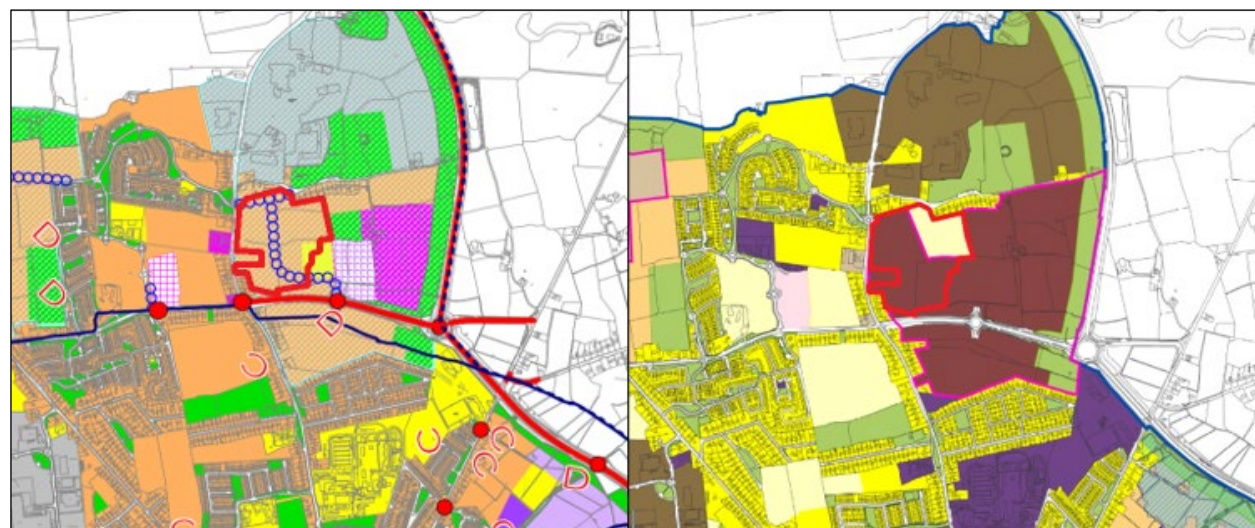


Figure 1.1: Side by side comparison showing the proposed rezoning of the majority of the subject site (approximately outlined in red) from ‘Residential’ in the *Tullamore Town and Environs Development Plan 2010-2016* (extended to 2020) on the left; and ‘Business or Technology Park’ in the *Draft Offaly County Development Plan 2021-2027* on the right (with the north-eastern portion being zoned ‘New Residential’). (Source: *Tullamore Town and Environs Development Plan 2010-2016* (extended to 2020) and *Draft Offaly County Development Plan 2021-2027*, respectively; annotated by TPA, 2020.)

The subject lands are currently zoned ‘Residential’. However, the *Draft Offaly County Development Plan 2021-2027* proposes the rezoning of the majority of these lands to ‘Business or Technology Park’.

In our professional town planning opinion, the proposed rezoning is unwarranted/premature and there is a clear and sustainable planning rationale to retain the existing residential zoning at the subject lands under the new zoning objective of ‘New Residential’.

In summary, the current *Draft Offaly County Development Plan 2021-2027*:

1. Seeks to rezone a substantial portion of the subject lands from ‘Residential’ (as per the *Tullamore Town And Environs Development Plan 2010-2016* (extended to 2020)) to ‘Business or Technology Park’ (which is part of a wider ‘Strategic Employment Zone’ zoning objective) and;
2. Removes the previously delineated Roads’ Objective from traversing the subject lands.

1.2 Clear Planning Need for Residentially-Zoned Lands

Table 2.2 of the *Draft Offaly County Development Plan 2021-2027* deals with the County’s Core Settlement Strategy. It identifies Tullamore as the County’s ‘Key Town’ with a net requirement for 1,497 No. residential units to be provided over the period of the proposed *Development Plan*.

Typology	Settlement	Population 2016	Population Increase to 2027	No. of residential units required	At least 30% of residential units into built-up footprint ⁴	Ha. of land required for new residential units to 2027
Key Town (density 35/ha)	Tullamore	14607	4853	1497	449	43

Figure 1.2: Extract from Core Strategy Table showing population projection and associated housing requirements for County Offaly for the period 2021-2027. (Source: Table 2.2 of the *Draft Offaly County Development Plan 2021-2027*.)

This is to accommodate an expected population increase of 4,853 persons to the year 2027.

1.3 Executive Summary

The Doorley Family is actively pursuing a planning and development strategy that will deliver much need residential development in Tullamore.

A phased approach to delivery will provide c. 200 No. residential units in line with Tullamore’s housing requirements.

¹ [Redacted]

² 80 Harcourt Street, Dublin 2, D02 F449.



We request that the proposed rezoning of the majority of subject lands from 'Residential' to 'Business or Technology Park' does not proceed as it will both eliminate the possibility to provide residential units; and reduce the likelihood of Tullamore reaching its target for new housing stock in the town over the lifetime of the forthcoming *Development Plan*.

The retention of residential zoning at the subject site lends itself to the gradual development strategy set out by Offaly County Council for the North-Eastern Masterplan area, as previously envisaged.

The Doorley Family has actively engaged with the Planning Authority in the phased development of the subject lands and their proposal is cognisant of local demand and requirements.

The proposed rezoning does not take into consideration the ongoing work at the subject lands conducted by the Doorley Family, nor the Application for, *inter alia*: a 90 No. bed nursing; and 77 No. unit residential development, currently before the Planning Authority (Reg. Ref. 20/450) that facilitates a high-quality development in the local area, as part of a residentially focused Masterplan.

While Section 12.6.2 of the *Draft Offaly County Development Plan 2021-2027* notes the prospective rezoning will facilitate future development associated with the Midland Regional Hospital at Tullamore, there appears to be nothing in the proposed zoning objectives that would prevent the development of a 'standard' Business/Technology Park.

While we accept Offaly County Council's strategy to zone more land for 'Business or Technology Park' use and we welcome the need for the provision of new and diverse employment streams, in our professional town planning opinion, the rezoning of the majority of the subject lands would benefit from further consideration, as we believe there are already adequate alternative and more suitable sites in Tullamore that fulfil that zoning objective.

For example, we note the availability of existing enterprise and employment lands for development at established Business Park facilities, including:

1. Axis Business Park;
2. Burlington Business Park;
3. IDA Business and Technology Park; and
4. Riverview Business Park.

2.0 STATUTORY PLANNING CONTEXT

2.1 Draft Offaly County Development Plan 2021-2027

At the time of writing, the preparation of the *Draft Offaly County Development Plan 2021-2027* is in the second stage of the three-stage public consultation process.

The content of the finalised *Offaly County Development Plan 2021-2027* will guide and inform the content of any future Local Area Plan for Tullamore and its environs.

As such, it is of paramount importance that policies, aims and objectives with regard to, *inter alia*, zoning and land-use strategy facilitate Tullamore’s future sustainable development.

Section 1.1 of that document introduces its content and states:

“[The] *Offaly County Development Plan* is a land use plan and overall strategy for the proper planning and sustainable development of the functional area of County Offaly over the 6-year period 2021-2027.”

Section 1.1 goes on to address Settlement Plans and states:

“Following the implementation of the Local Government Reform Act 2014, this Development Plan incorporates the areas formerly within the administrative areas of Tullamore Town Council and Birr Town Council. Zoning maps are included for Tullamore and Birr, however new Local Area Plans will be made for these settlements after the adoption of this County Development Plan.”

2.1.1 Zoning Objectives at Subject Site

The *Draft Offaly County Development Plan 2021-2027* sees the introduction of ‘Strategic Employment Zones’.

Section 12.6.2 addresses the issue of ‘Strategic Employment Zones (particular to Tullamore)’.

That section states:

“Reflecting Regional Policy Objective 4.27 of the Regional Spatial and Economic Strategy which states that Key Towns (such as Tullamore) shall act as economic drivers and provide for strategic employment locations to improve the economic base by increasing the ratio of jobs to workers, **it is an objective of the Plan to provide two Strategic Employment Zones (SEZ) within the settlement boundary of Tullamore town in the following areas:**

- **Ardan Road; and**
- **Ballyduff.**

The purpose of this objective is to facilitate strategic large scale employment in development zones in a sequential manner to promote sustainable compact growth in tandem with the

delivery of infrastructure and enabling services. These zones have development capacity, good accessibility, availability of a land bank of at least 100 acres in size and potential to deliver significant economic development and employment creation.

The proposed Ardan Road SEZ has potential to cater for the expansion of Midland Regional Hospital, Tullamore and its continued development as a Teaching/University Hospital and/or to provide a Med or Bio Technology Park with linkages to the Hospital...

It is an objective of the Council to:

LUZO-15 Support the development of Strategic Employment Zones in Tullamore at;

(a) Ardan Road to cater for the expansion of Midland Regional Hospital Tullamore and its continued development as a Teaching/University Hospital, and/or a Med or Bio Technology Park with linkages to the Hospital...

[Our emphasis.]

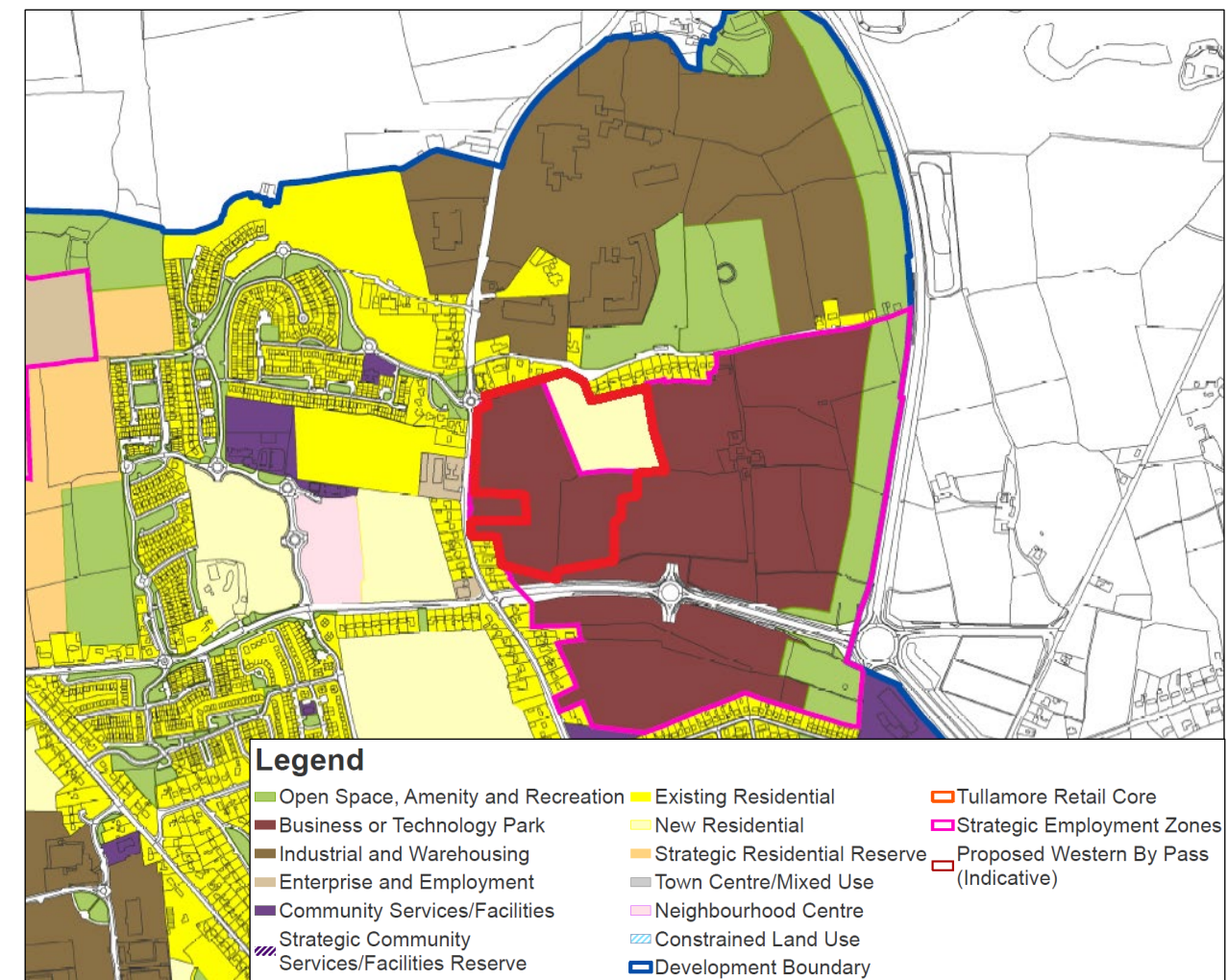


Figure 2.1: Extract from *Draft Tullamore Town Map* showing the lands owned by the Doorley Family (approximately outlined in red) and one of the ‘Strategic Employment Zones’ proposed for Tullamore (outlined in purple). The image shows the different proposed land-use objectives that will negatively impact the development potential of the Doorley Family land holding. (Source: *Draft Offaly County Development Plan 2021-2027*; annotated by TPA, 2020.)

When taking account of the land ownership at the proposed 'Strategic Employment Zone', the content of Figure 2.1 indicates the somewhat piecemeal combination allocation of zoning objectives at the subject lands and its surrounding area.

In our professional town planning opinion, there is a relative lack of clarity with regard to the justification for the rezoning of the majority of the subject lands for the aforementioned purposes that raise, *inter alia*, the following questions.

1. Has the Planning Authority engaged with the relevant healthcare authorities regarding any proposed expansion of the Midland Regional Hospital at Tullamore and/or the provision of any associated facilities?
2. Has there been any consultation or engagement with the land owners in the proposed 'Strategic Employment Zones'? If so, what was the outcome of those discussions?
3. Has any credence been given to the content of the *Dublin Midlands Hospital Group Strategy 2018-2023*, which, while acknowledging potential ward expansion at Midland Regional Hospital at Tullamore (page 74 of that document), does not refer to a physical expansion of the hospital's footprint or any other associated development?



Figure 2.2: Location of Midland Regional Hospital at Tullamore (marked X) with the location of the subject lands (approximately outlined in red) shown in context. The distance between the entrance to the Hospital and the closest edge of the subject lands is c. 900m. (Source image: Google Maps; annotated by TPA, 2020.)

It is noted that there are undeveloped sites closer, as well as directly adjacent to, the Midland Regional Hospital at Tullamore, that would be better suited to any proposed development associated with that medical facility.



Figure 2.3: Front Cover of *Dublin Midlands Hospital Group Strategy 2018-2023*.

2.2 Offaly County Development Plan 2014-2020

The *Offaly County Development Plan 2014-2020* is the current statutory Development Plan for County Offaly.

That Statutory Plan was composed and adopted in a period where the country was still recovering from the devastating economic impacts of the global recession of the late 2000s.

Section 1.15 of that document addresses the Planning Authority's 'Approach to Future Population Growth.

That Section notes that:

"a minimum overall density of 35 residential units per ha will be expected in Tullamore Town and Environs."

In addition, a focus of the *Offaly County Development Plan 2014-2020* is to:

“Stimulate population growth in Tullamore in accordance with its identified role as part of the Midlands Linked Gateway so that it can form part of the driver of development for the region and County Offaly.”

2.3 Tullamore Town and Environs Development Plan 2010-2016 (extended to 2020)

The *Tullamore Town And Environs Development Plan 2010-2016* (extended to 2020) is the active Local Area Plan.

It notes:

“It is extremely important that this plan conforms to these documents [County Development Plans] as they set strategies, policies, objectives and an overall vision for the County as whole, which is a key part to the future development of Tullamore. This plan embraces Tullamore’s status as part of a “Linked Gateway” and its position at the pinnacle of the County Settlement Hierarchy.”

It should be noted that the *Draft Offaly County Development Plan 2021-2027* refers to Tullamore as the County’s ‘Key Town’, which is still at the “pinnacle of the County Settlement Hierarchy”.

It is also noted that a further *Tullamore Town And Environs Development Plan* will be proposed, pending the finalisation of the *Draft Offaly County Development Plan 2021-2027*.

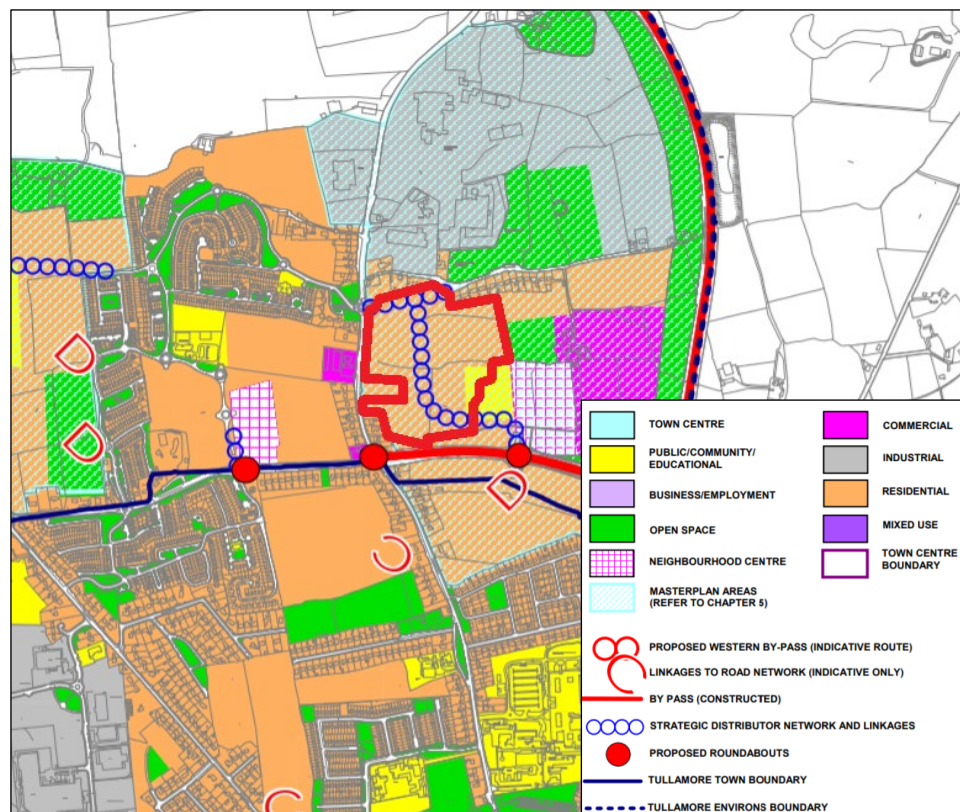


Figure 2.4: Extract from *Tullamore Town Map* showing the lands owned by the Doorley Family (approximately outlined in red), showing its location within the North-Eastern Masterplan Area. (Source: *Tullamore Town and Environs Development Plan 2010-2016* (extended to 2020); annotated by TPA, 2020.)

2.4 National Planning Framework – The Primary Framework Guiding National Development

The *National Planning Framework (NPF)* was published by the Government of Ireland in February 2018 with the objective of providing a planning framework to guide development and investment and to shape national, regional and local spatial development in economic environmental and social terms to 2040.

The *NPF* clearly sets out the requirement for compact growth at all settlement sizes across the country.

Section 2.6 relates to ‘Securing Compact and Sustainable Growth’.

That Section notes that:

“An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village, has the potential to make a transformational difference. It can bring new life and footfall, contribute to the viability of services, shops and public transport, increase housing supply and enable more people to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less.”

[Our emphasis.]

It is considered that the retention of residential zoning of the subject lands (in the form of the ‘New Residential’ zoning objective) will allow for the development of high-quality residential development in a compact form.

Section 3.2 of the *NPF* relates to effective regional growth in the Eastern and Midland Region.

That Section states:

“... one of the most significant spatial development changes in recent years has been driven by the rising economic strength of Dublin, rapidly improving transport connectivity and issues such as housing cost. This has given rise to more intensive interactions between Dublin and various towns along the key road and rail routes.”

[Our emphasis.]

The subject site, located approximately 100 kilometres from Dublin City Centre, will play a vital role in the maintaining and enhancing the region’s economic strength. Tullamore is in a unique strategic position within County Offaly (as its ‘Key Town’) due to its access to both rail and road networks with strategic access to Dublin City and County.

Two key National Policy Objectives highlight the requirement for the delivery of new housing.



They are:

National Policy Objective 32

“To target the delivery of 550,000 additional households to 2040.”

National Policy Objective 33

“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”

Promotion and encouragement of new residential development should be actively supported within the *Draft Offaly County Development Plan 2021-2027*, in line with the Policy Objectives of the *NPF*.

2.5 Regional Spatial and Economic Strategy – Planning and Economic Strategy To Create a Better Eastern and Midlands Region

The elected members of the Eastern and Midland Regional Assembly (EMRA) agreed to make the *Regional Spatial and Economic Strategy (RSES) 2019-2031*, on 28 June 2019.

The Strategic Vision for the *RSES* is focused on achieving key principles is set out in Section 2.2, which states, *inter alia*:

“A key challenge facing the Region, along with all other regions, is the transition to a low carbon society. For the RSES, this means five primary areas of transition which are at the core of the Strategy:

- *sustainable development patterns which promote compact growth, reduce transport demand and encourage low carbon transport modes;*
- *sustainable transport systems (people and freight...)”*

[Our emphasis.]

The provision of residential development in the established ‘Key Town’ of Tullamore will contribute to achieving the key principles highlighted above.

Section 4.6 of the *RSES* addresses Key Towns within the EMRA Region, of which Tullamore is one.

Pages 88 and 89 deal with the aims and objectives for Tullamore.

The description of the town states:

“The town has a high ratio of jobs to resident workers, reflecting its role as an employment centre and the extent of its area of influence. Continued employment and population growth coupled with placemaking and regeneration are key priorities for the settlement.”

[Our emphasis.]

Furthermore, the matter of ‘Residential Development’ is addressed directly, as follows:

“Relevant to the delivery of housing in Tullamore is support for a range of housing types which are well designed with consideration to tenures and density, integrated green infrastructure, active travel links and renewable energy options. The provision of housing at the right locations will play a fundamental role in the overall economic, social and environmental success of the settlement.”

[Our emphasis.]

Those descriptions highlight the importance of housing provision in Tullamore – something the development of the subject lands will contribute to achieving, if permitted.

3.0 TOWN PLANNING ARGUMENT

3.1 Distillation of the Outcome Sought by this Submission

One of the key differences between the *Tullamore Town And Environs Development Plan 2010-2016* (extended to 2020) and the *Draft Offaly County Development Plan 2021-2027* is the delineation between 'Existing Residential' and 'New Residential' in the latter. (The former simply refers to a 'Residential' zoning objective.)

This submission seeks to retain the residential zoning objective of the subject lands as 'New Residential' in the *Draft Offaly County Development Plan 2021-2027*.

This retention of residential zoning would serve the more important planning role of opening up for residential development a strategic land bank within minutes of Tullamore Town Centre.

3.2 Active Planning Application and Development Process

The Doorley Family has actively engaged with the Planning Authority with regard to the residential development of the subject lands, in line with the existing zoning objectives for that site.

We note that a Pre-Planning Meeting was held between Offaly County Council and representatives of the prospective Applicant's Design Team on Thursday, 23 January 2020.

As a result of the discussions at that Meeting, a Planning Application has been submitted to Offaly County Council with regard to the part of the subject lands (Reg. Ref. 20/450) and is currently under assessment, having been lodged on Tuesday, 22 September 2020.



Figure 3.1: Extract from 'Proposed Site Plan' submitted under Reg. Ref. 20/450, currently under consideration by Offaly County Council. (Source: Drawing No. 19020 - PP01, prepared by Fewer Harrington & Partners.)

The proposal currently under consideration by the Planning Authority consists of, *inter alia*:

- A 90 No. bed nursing home;
- 77 No. residential units ranging from 1-bedroom to 3-bedrooms in size; and
- A coffee-shop.

As long-standing members of the local community, the Doorley Family is cognisant of local demand for housing and its specific requirements in terms of, *inter alia*, type and tenure. They have a firm commitment to providing a high-quality, residential development at the subject lands for a wide range of living requirements for residents at different stages of their lives.

At the core of their development proposal is the desire to enhance this area of Tullamore, which is a key entry route to the town centre from its northern environs.

As such, in our professional town planning opinion, any proposal to rezone the majority of the subject lands, which form part of a phased Masterplan, would be premature.

3.3 Removal of Roads' Objective Is Counterproductive

The proposed section of the Strategic Distributor Network has been removed from the *Draft Offaly County Development Plan 2021-2027*. (see Figure 1.1 for side by side comparison.)

We consider the removal of that Objective to be premature.

Discussions took place between the Applicant's Design Team and the Roads Department of Offaly County Council in December 2018 with regard to the relationship between any proposed development at the subject lands, and the delivery of the proposed Distributor Road.

The items raised by the Planning Authority over the course of that discussion have been incorporated into the design proposal submitted under Reg. Ref. 20/450 and are a fundamental element of that scheme.

Regardless of any proposed amendments to zoning objectives at the Arden Node, the removal of that Roads Objective would have the result of stymying of development of any description at the subject site.

We consider the provision of the Distributor Road at the Arden Node to be essential to the successful phased development of the subject lands and we seek its retention in the finalised *Offaly County Development Plan 2021-2027*.

3.4 Retention of Residential Zoning Would Realise Aims of the *Draft Offaly County Development Plan 2021-2027*

The subject site provides Offaly County Council with an opportunity to zone lands that will aid to realise the aims of the *Draft Offaly County Development Plan 2021-2027*.



Having regard to the key policies and objectives set out in the Draft Plan, the use of the subject lands for residential use would be of major strategic benefit, and represent an exemplar of good planning practice.

As part of the 'North Eastern Environs' Masterplan Area identified in the *Tullamore Town And Environs Development Plan 2010-2016* (extended to 2020), the value of that landbank for residential purposes was identified as follows:

*"This masterplan area bounds the residential area of Arden Vale to the south and is accessed predominantly from the N52. The N52 is the gateway to Tullamore Town from the M6 and an opportunity exists to create a positive entrance to the town. **There is ample opportunity to create new communities within this masterplan area and provide services to cater for the needs of both new and existing established residential areas at this location.**"*

[Chapter 4, page 3.]

[Our emphasis.]

The zoning of the subject lands with a 'New Residential' zoning objective provides a major opportunity to contribute towards Tullamore's projected new housing requirements. Furthermore, the land owners have been actively seeking to facilitate residential development for a number of years at the subject lands.

In this context, we contend that the rezoning of the majority of the subject lands, with regard to the proposed change of Business or Technology Park' would be premature.

3.5 What Happens if the Subject Site is Residentially Developed?

3.5.1 Contribution to Net Target of New Housing Units

The *Draft Offaly County Development Plan 2021-2027* has a net target of 1,497 No. residential units over the period of the *Plan* for Tullamore and its environs.

The proposed phased residential development of the subject lands will see c. 200 No. residential units provided on site.

That housing provision would provide a large contribution to the achievement of the aims and objectives of the *Draft Offaly County Development Plan 2021-2027*, with regard to its settlement strategy.

We would also question if any research has been conducted with regard to the development intentions (or otherwise) of the respective landowners of lands proposed for 'New Residential' zoning?

3.5.2 Phasing – Sequential Test / Sequential Development

The *Draft Offaly County Development Plan 2021-2027* must take into consideration the phasing of development. The subject proposal is consistent with the sequential test as it provides for the expansion of the town from its central areas in a coherent manner³.

Residential zonings should both respond to the current economic climate and prepare for a future demand.

The *Draft Offaly County Development Plan 2021-2027* is set out over a period of 6 No. years and must be prepared for future housing requirements, as well as taking account of the likelihood of increased numbers of people working from home in future.

3.5.3 Proposed Residential Development at Subject Site would be suitable for all Socioeconomic Groups

The site's location enables sustainable settlement patterns to be developed, as part of a coherent Planning Application Masterplan which will be proposed by the Doorley Family. In addition, some of the proposed 'New Residential' zoning locations contained within the *Draft Offaly County Development Plan 2021-2027* do not lie adjacent to the town centre, but on the periphery of Tullamore.

An example of such a site is the area proposed as 'New Residential' to the east of the town, at Daingean Road.

These may viable locations for family living, but perhaps not suitable for the those with mobility issues, for example.

Elderly people can live more independent lives when they are located in close proximity to town centres and existing facilities.

The subject site location, in tandem with a forthcoming phased Masterplan, will cater for the requirements all socioeconomic and demographic groups as a fully accessible and resilient residential site.

Indeed, the first phase of the proposed residential development at the subject lands would see the delivery of c. 77 No. Units for social care & the development of an associated 90 No. bedroom nursing home.

³ *Development Plan Guidelines* – DEHLG (2007).



3.6 Evidence-Based Planning suggests the Subject Site is superior to other Zoned Lands and In Line with Planning Objectives for Tullamore

The key site characteristics include that the subject lands:

- Lie adjacent to the established Town Centre of Tullamore and should be used to consolidate and strengthen its urban form.
- Promote sustainable travel being strategically located within 500m of the Town Centre, 1500m of the Railway Station and 100m of Bus Stops.
- Form part of the contiguous built-up area of Tullamore Town Centre and enjoy close proximity to a wide and growing range of facilities and amenities.
- Easy access to: the M6 Motorway between Galway and Dublin (via the M4); and the N52 National Road (which offers access between Nenagh in County Tipperary and Dundalk in County Louth).

In addition, the:

- Lands do not constitute 'Periphery Development'.
- 'New Residential' zoning complies with National, Regional and Local Plans and Guidelines.

3.7 Site Location and Urban Context

The Doorley Lands, a site of approximately 11.7 hectares (29 acres), are located to the east of Arden Road (N52), which leads to Kilbeggan and the junction with the N6/Dublin - Galway Road.

The lands have a frontage of approximately 200 metres to Arden Road.

The lands are bounded to the north by a local laneway giving access to a row of detached houses; to the east by agricultural land; and to the south by the Tullamore By-Pass.

3.8 Land Ownership – Local Interest

The lands which are subject of this submission are owned by the Doorley Family and form approximately 11.7 hectares (29 acres), located north of Tullamore Town Centre.

3.9 The Subject Site is part of the Contiguous Built-Up Area of Tullamore Town Centre

The subject site is located directly adjacent to the R421 Regional Road, which links Tullamore Town Centre, with the N52 National Road. This is one of the main arteries in terms of road access to Tullamore and the M6 Motorway from the subject lands and forms the 'spine' of the Town Centre.

Therefore, the site is part of the contiguous built-up area of Tullamore.

In terms of urban form, the site provides potential to develop a natural extension to the town centre while the proposed rezoning would form a natural boundary to the north of Tullamore. Retention of residential zoning at the subject lands will not going exacerbate urban sprawl, but rather define a northern boundary that already exists with regard to the morphology of Tullamore.

The location is also consistent with the sequential development of Tullamore, providing for the expansion of the town from its central areas in a coherent manner.

3.10 Services and Infrastructure – Provides Excellent Residential Development Potential

The provision of services should be economically viable and represent the best investment for the citizens of Tullamore. The subject lands provide an economically viable site of residential development, with regard to the provision of services due to their central location.

Road

The M6 motorway bypasses the town of Tullamore. The R421 Regional Road connects the town at Junction 5 of the M6. Easy and direct access is provided via the R421 from the subject site to the M6 Motorway, which is the primary route from Dublin to Galway (via the M4).

Rail

Tullamore has excellent rail links, situated on the main Dublin - Galway and Dublin – Westport/Ballina railway line. A regular commuter train service operates between Tullamore and Dublin.

The subject site is located within c. 2.7km of Tullamore train station.

The services and infrastructure required to pursue residential development in this location are already in place, making this land prime for 'kickstart' development.

3.11 Facilities and Amenities – An Abundance of Established Services

The subject lands are located c. 1.6km north of Tullamore Town Centre. Therefore, there is an abundance of facilities and amenities available in close range to the site. Amongst the wide range of facilities and amenities, we wish to highlight the following:

- Midland Regional Hospital at Tullamore;
- Tullamore Health Centre;
- Offaly County Library;



- Numerous Primary and Secondary Schools;
- O'Connor Park GAA Ground;
- Numerous sports clubs and facilities;
- Tullamore Shopping Centre;
- The Bridge Shopping Centre;

- Axis Business Park;
- IDA Business Park;

- Kilcruddin Business Park; and

- Tullamore Town Centre and its associated retail, commercial and social facilities.

The facilities and amenities, available in close proximity to the subject site, ensure that residential development will be socially and economically sustainable in this location.

3.12 Proposed Rezoning is not justified in Draft Offaly County Development Plan 2021-2027

It is noted that neither the term 'rezone', nor the term 'rezoning' are referenced in the *Draft Offaly County Development Plan 2021-2027*.

In addition, there is no reference to the reasons why lands chosen for rezoning and their associated development criteria.

Section 2.1.5 states:

"Where the amount of land that was zoned under the 2014-2020 County Development Plan is surplus to the amount of land that is required to meet the needs of the current Plan period (2021-2027), the following approaches are available to address the difference:

- *designation of lands as 'strategic residential reserve';*
- *zoning of lands for an alternative use; or*
- *dezoning of lands."*

[Our emphasis.]

This raises a number of questions about the aforementioned 'surplus'.

1. What quantum of land was considered surplus and why?
2. What factors led to the population projection and housing targets set out in *Offaly County Development Plan 2014-2020* not being reached?
3. What factors have been considered with regard to the justification of the former 'Residential' lands being rezoned, while other lands retained their residential zoning? Have all the relevant landowners been consulted about their intentions regarding prospective development?

It would appear that there is an absence of justification in the *Draft Offaly County Development Plan 2021-2027* with regard to the proposed rezoning of the subject lands and this of great concern to the Doorley Family.

3.13 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)

Section 1.9 on Sustainable Residential Development states that:

"Housing developers, their design teams, the planning system, and the community they serve, share a common goal to create high quality places which:

- *Prioritise walking, cycling and public transport, and minimise the need to use cars;*
- *Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;*

- *Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;*

- *Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained; and*

- *Are easy to access for all and to find one's way around..."*

In our professional town planning opinion, the subject site enables the realisation of the above-mentioned goals with regard to Tullamore. The sites location would allow the creation of sustainable residential development with easy access to Tullamore Town Centre, its environs and its associated facilities and services.

4.0 CONCLUSION

In conclusion, we trust that this submission illustrates the crucial importance of retaining these residentially-zoned lands to contribute towards the housing needs of Tullamore's growing population.

As outlined in the content of this submission, the Doorley Family has actively engaged with the Planning Authority in the phased development of the subject lands.

It is of great concern to them that their carefully considered approach to the delivery of a much-needed residential development in Tullamore may be inhibited by the proposed rezoning of the majority of the subject lands.

Their proposal is cognisant of local demand and requirements and at its core, is the desire to enhance Tullamore's public realm through the provision of a high-quality scheme.

This submission demonstrates the proposal's clear adherence to realising the core objectives of the *Draft Offaly County Development Plan 2021-2027*, while also noting numerous issues relating to the rezoning of the majority of the subject lands as part of a wider 'Strategic Employment Zone', linked with Midland Regional Hospital at Tullamore.

We trust that this submission will be taken into consideration in preparation of the final *Offaly County Development Plan 2021-2027*, and would welcome receipt of a letter of acknowledgement.

If you have any queries or comments with regard to this submission, we would be happy to discuss this matter further or furnish the Council with any information that may be required.

Yours faithfully



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Encl.