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SUBMISSION TO DRAFT EDENDERRY LOCAL AREA PLAN 2023-29

submission concerning lands in

**MONASTERORIS, EDENDERRY,
CO.OFFALY**

Client: Mr. David Foran

1st February 2023

EXECUTIVE SUMMARY

David Mulcahy Planning Consultants Ltd, have been instructed by **Mr. David Foran** to prepare a submission to the draft Edenderry Local Area Plan 2023-29 concerning lands measuring c.1.7 hectares at Monasteroris, Edenderry, Co. Offaly.

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 ELAP 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.

This submission will demonstrate to the Council that the subject lands **should be designated for Serviced Sites**.

The serviced sites will provide a viable alternative to persons who meet local needs criteria but cannot obtain planning permission for a dwelling.

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been retained by **Mr. David Foran** to prepare a submission to the Draft Edenderry Local Area Plan 2023-29 concerning the future development of the town with specific reference to lands measuring 1.7 hectares at Monasteroris.

This submission meets the statutory deadline of 4pm on 3rd February 2023.

The purpose of this submission is to demonstrate that the subject lands which are backland/infill in nature and largely surrounded by existing housing should be zoned for Serviced Sites in order to provide a viable alternative to one-off housing in the surrounding hinterland of Edenderry in accordance with national planning policy.

This report should be read in conjunction with the indicative layout and services drawing prepared by **Pat Kerr Architecture**.

All maps are orientated due north. All underlined italics text is author's emphasis.

2.0 BACKGROUND

2.1 Location

The subject lands are located at the western edge of Edenderry town – see Fig No.1 below.

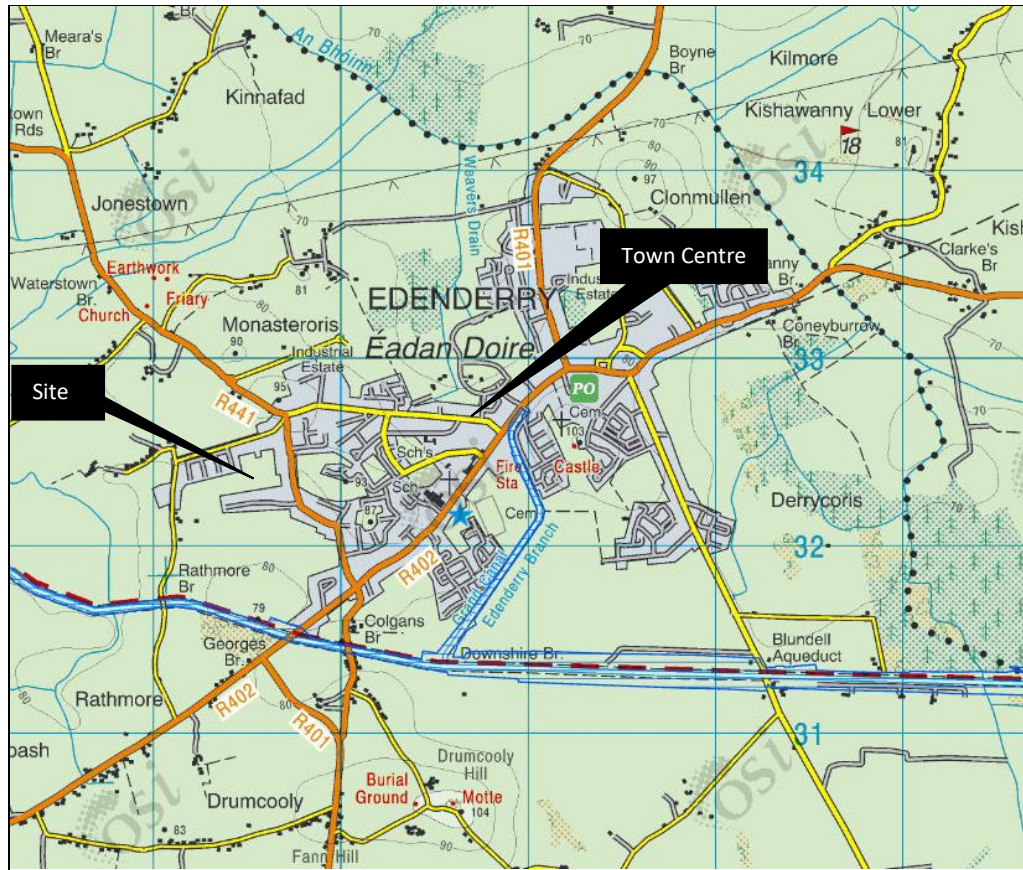


Fig No.1 Site Location Map (source: Myplan.ie - OSI Licence No.EN 0080915)

2.2 Description

The subject lands measure c.1.7 hectares and are greenfield in nature; currently under pastoral use. Much of the boundaries of the site are formed by mature hedgerow particularly to the north and west.



Fig No.2 Site Context Map showing subject site in red (source: Myplan.ie - OSI Licence No.EN 0080915)



Fig No.3 Satellite image of the site dated March 2022 (Google Earth Pro).



Fig No.4 Photographs of the site (Jan 2023).

2.3 Built and Natural Heritage

There are no built or natural heritage features associated with the subject lands (archaeology, NHA, pNHA, Natura 2000 etc).

2.4 Adjoining Land Uses

South	The lands have frontage onto a cul-de-sac road which serves other residential dwellings. A number of these residential dwellings back onto the southern boundary of the site.
East	There is a small linear greenfield land holding to the east, with dwellings located beyond.
West	There is an agricultural field to the west.
North	The rear gardens of dwellings back onto the site – they are notably long in depth.

In summary the site is bordered by residential development on three sides (allowing for a small linear greenfield area to the east).



Fig No.5 Linear strip of land to east side of the site (Jan 2023)



Fig No.6 Road to front of the site.



Fig No.7 View of site from public road (Jan 2023)

2.5 Services

Please refer to the drawing prepared by **Pat Kerr Architecture** which notes existing services in the vicinity of the site.

2.6 Flood Risk

A review of floodinfo.ie did not reveal any flood risk issues associated with the subject site.



Fig No.8 Extract from floodinfo.ie.

2.7 General Area

The subject site is located at the edge of the built-up area of Edenderry town, approximately 1.6km from the town centre.

It is notable that there are established dwellings, including The Manor housing estate, which are located further west, beyond the subject site – see blue shaded area in diagram below.

The western portion of the town has a notable cluster of schools. There are 3 in total including two primary schools and a post-primary school – see orange shaded area in diagram below.

1. Scoil Bhríde Primary School Edenderry
2. Gaelscoil Éadan Doire, Killane, Edenderry, R45 ED89
3. Edenderry 2 National School

The town itself has a wide range of social and community infrastructure including church, schools, post office, pharmacy, creche, GAA pitches, pubs and shops.



Fig No.9 Land uses in the vicinity of the site (source: Myplan.ie - OSI Licence No.EN 0080915)

3.0 PLANNING HISTORY

3.1 Prosperous Extant Permissions

There are no planning applications associated with the subject lands. There are planning applications of note on the surrounding lands.

4.0 PLANNING CONTEXT

4.1 Housing For All - a New Housing Plan for Ireland, 2021

On the 3rd September 2021 the government unveiled the Housing for All - a New Housing Plan for Ireland. The government's vision for the housing system over the longer term is to achieve a steady supply of housing in the right locations with economic, social and environmental sustainability built into the system.

It is estimated that Ireland will need an average of 33,000 new homes to be provided each year from 2021 to 2030.

The policy has four pathways to achieving housing for all:

1. supporting home ownership and increasing affordability
2. eradicating homelessness, increasing social housing delivery and supporting social inclusion
3. increasing new housing supply
4. addressing vacancy and efficient use of existing stock

4.2 National Framework Plan ('NPF') 2040

The NPF is based on a projection of a 5.7 million people population by 2040 which is used as a benchmark against which the strategy is placed. This benchmark provides for one million additional people, 660,000 additional jobs and 550,000 new homes by 2040 (or 25,000 houses to be built each year).

50% of the national population growth should happen in the Eastern and Midlands (EMRA) Region and 50% of this population growth should happen within the City of Dublin and its suburbs. This represents significant housing growth in the EMRA Region up to 2040 which includes Co. Offaly.

National Policy Objective 11

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth – emphasis added.

The NPF notes that in rural Ireland, many people seek the opportunity to build their own homes but find it difficult to do so in smaller settlements because of a lack of available sites and services. In order to assist this, local authorities will be supported in undertaking the necessary land acquisition, site preparation and local infrastructure provision to deliver self-build development options in smaller towns/villages. This would also apply in respect of private developers.

National Policy Objective 18b

Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.

4.3 Sustainable Urban Residential Development in Urban Areas Guidelines ('SURDUA') 2009

In section 6.3 'general advice', subsection (d) deals with 'Offering alternatives to urban generated housing'. It states that provision can be made for lower density development in towns to provide alternative to one-off housing.

"In some limited circumstances, notably where pressure for development of single homes in rural areas is high, proposals for lower densities of development may be considered acceptable at locations on serviced land within the environs of the town or village in order to offer people, who would otherwise seek to develop a house in an unserviced rural area, the option to develop in a small town or village where services are available and within walking and cycling distance".

4.4 Regional Spatial and Economic Strategy for the Eastern and Midland Region, ('RSES') 2019 - 2031

At its core, the RSES sets out a settlement and economic growth strategy that seeks to ensure that the needs of the Regions' citizens such as access to employment opportunities and services, ease of travel and overall well-being are met.

Prosperous is located in the Core Region in the EMRA Growth Strategy - home to over 550,000 people, includes the peri-urban 'hinterlands' within the commuter catchment of the Dublin metropolitan area, which extends into parts of the Midlands, Louth and beyond the Region into Wexford, with some of the youngest and fastest growing towns in the Country.

Regional Strategic Outcome

Compact growth and Urban regeneration

Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens (NSO 1).

4.5 Offaly County Development Plan ('CDP') 2021-27

Edenderry is identified as a **Self-Sustaining Town** in the County Settlement Hierarchy. 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.

The core strategy table identifies a population increase of 721 for the town by 2027 (from the population recorded in the 2016 Census), 299 new houses after town centre sites are accounted for, and 10 hectares of New Residential zoned lands to cater for same.

5.0 DRAFT EDENDERRY LAP 2023-29

5.1 Zoning Map

The site is **not zoned** in the Draft ELAP despite being a backland infill site surrounded by existing housing, most of which is zoned.



Fig No.10 Location of site within dELAP 2023-29 showing site outside but adjoining the town boundary.

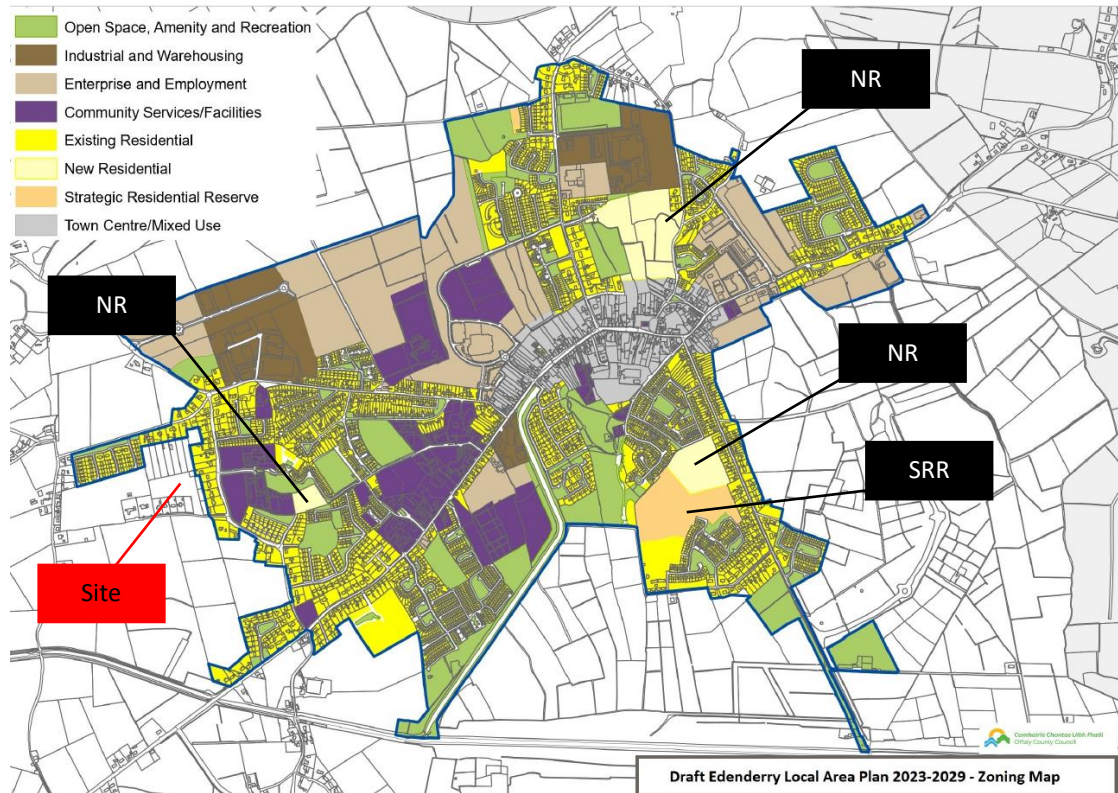


Fig No.11 Draft Zoning Map in the dELAP showing 3 locations zoned New Residential ('NR') and one for Strategic Residential Reserve.

Planned Transportation

The Transport Plan Map showing Proposed Infrastructure shows the site to be located just outside the 1.6km radius from the town centre. It shows that there are improvement work to road in the location and an indicative new ring road further to the west.

Planned Services

The wastewater treatment system serving Edenderry at Monasteroris Edenderry will be increased from 9,800 to 12,500 post 2024.

Planning and Infrastructure Assessment

We note that the subject site was **not included** in the 24 sites examined in this assessment as per Figure 10.1 Location of sites assessed as part of this Planning and Infrastructural Assessment. We consider this to be strange, particularly as it

was zoned for residential land use previously in 2006¹ and is largely surrounded by existing housing.

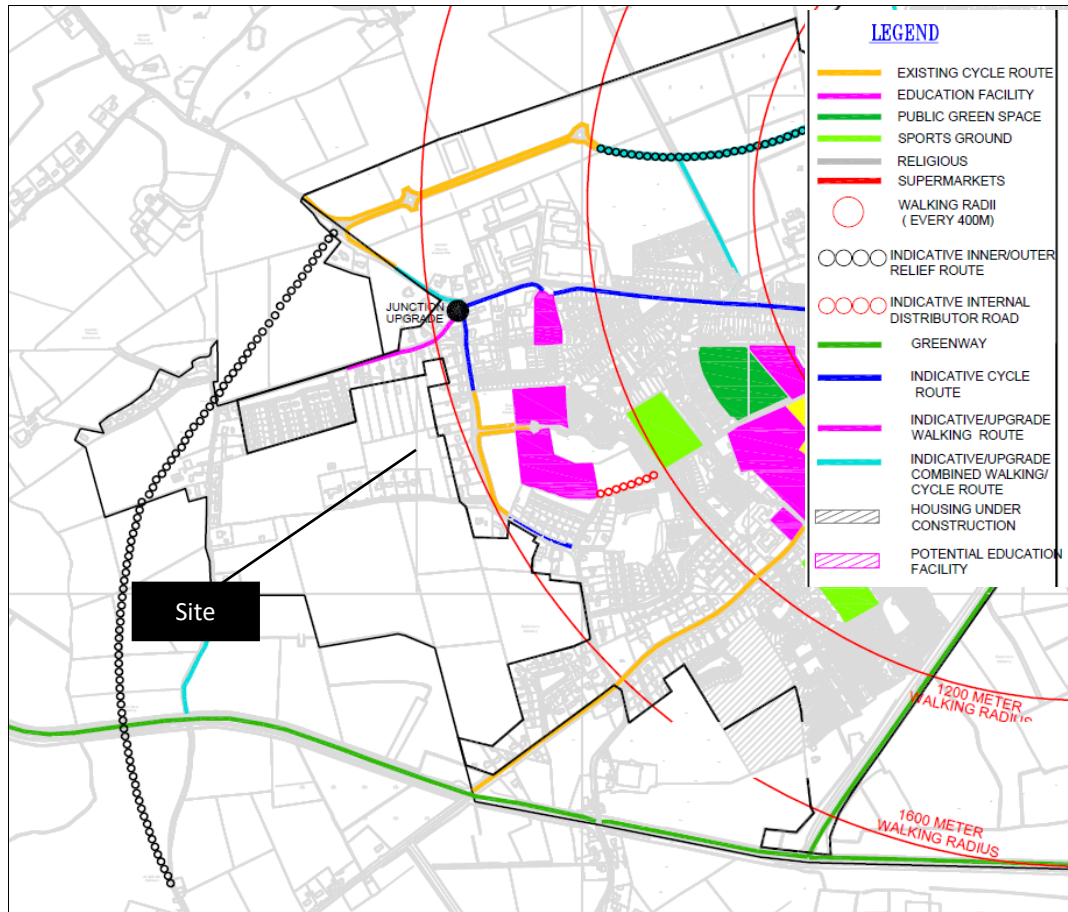


Fig No.12 Draft Edenderry LAP - local transport plan - proposed infrastructure.

¹ Source: client.

6.0 SUBMISSION

6.1 Summary

- National and regional planning strategies promote compact urban settlements with an emphasis on developing lands close to town centres for residential development.
- The site is located in Edenderry which is a Self-Sustaining Town in the Offaly Settlement Strategy in the CDP.
- The site adjoins the town development plan boundary and is currently zoned Agricultural under the KCDP 2017-23.
- The lands were 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 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 dELAP 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.

6.2 Submission

We note that the 2016 Census is being used as the base figure for forecasting population growth and housing targets for Edenderry. We highlight that the **2022 Census recorded significant population increase across the country** and this is likely to be reflected in the town of Edenderry. These Census figures are due out soon and the draft Plan should take these into consideration. We further highlight that the NPF housing targets are also based on 2016 Census population figures. Given the significant population growth along with the influx of Ukrainians into the country the housing crises continues to be a major concern and needs to be addressed. Recently the Irish Times reported that the Housing Commission may need in excess of 60,000 houses built a year².

This submission seeks for the subject lands to be zoned **Serviced Sites**.

National Policy Objective 18b is clear that provision should be made for serviced sites to act as a counter to one-off housing in the countryside.

² Ireland may need up to 62,000 new homes a year, Housing Commission indicates - Unpublished research suggests State requires almost double current Government annual target for new builds, 26th Jan 2023

The SURDUA Guidelines 2009 specifically allowed for this type of development at the edge of towns and village in order to provide an alternative to one-off housing. One-off housing has continued to grow since 2009³.

We highlight to the Council that this zoning objective was recently introduced in the Kildare County Development Plan 2023-29 in a number of settlements and was identified as a priority issue within the Plan. The logic was to provide a viable alternative to those persons who would otherwise build a one-off house in the countryside.

Edenderry is located in an area of the county where there is a strong demand for one-off housing as per Figure 2.6 Open Countryside Housing Policy Map of the OCDP.

We consider that that this zoning objective would:

- Increase the supply of much needed housing in Co. Offaly and in Edenderry town in particular.
- Provide a genuine viable and attractive option in the form of large houses and on large sites for those who would otherwise build in the surrounding countryside.
- Be fully compatible with the adjoining residential development.

We submit that this type of lower density housing would be ideal on the subject lands and would be consistent with the established pattern of development in the area and compatible with adjoining uses. It can only be undertaken on a limited basis at the edge of towns and we consider the subject infill site to be ideal for this purpose.

³ Big rise in one-off rural homes risks clashing with State's policy on housing, Irish Independent, 30 Dec 2022 reflecting concerns raised by the OPR.



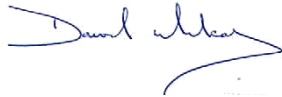
Typical example of housing delivered on Served Sites – Two Mile House, Co. Kildare.

6.6 Conclusion

We trust this Council will give this submission serious consideration in preparing the Edenderry Local Area Plan 2023-29. We consider that the zoning for the subject undeveloped infill site for **Services Sites** land use as a viable alternative to one-off housing represents proper planning and sustainable development of the area and entirely compatible with adjoining land uses and the general pattern of development in the area.

We enclose a drawing showing indicative layout for 8 dwellings and services prepared by Pat Kerr Architecture.

Signed:



David Mulcahy

David Mulcahy Planning Consultants Ltd

Appendices

A Site Location Map with site outlined in red.

B Drawing showing indicative layout for 8 dwellings and services prepared by Pat Kerr Architecture.

Osi PLACE Map



CENTRE
COORDINATES:
ITM 661539,732332

PUBLISHED:
28/11/2022

MAP SERIES:
1:1,000
1:2,500

MAP SHEETS:
3250-23
3250-C

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Feasibility - Housing Development
Edenderry Co. Offaly
For David Foran

Patrick M. Kerr Architecture Jan '23