

Senior Executive Officer  
Forward Planning Section  
Offaly County Council  
Áras an Chontae  
Charleville Road  
Tullamore  
County Offaly

Thursday, 2<sup>nd</sup> February 2023  
[via Planning Portal]

Dear Sir/Madam

**RE: DRAFT EDENDERRY LOCAL AREA PLAN 2023-2029: SUBMISSION IN RESPECT OF LANDS LOCATED TO THE WEST OF EDENDERRY BUSINESS CAMPUS, EDENDERRY, CO. OFFALY**

## 1.0 INTRODUCTION

Gambara Limited<sup>1</sup> have retained Tom Phillips + Associates, Town Planning Consultants<sup>2</sup>, in association with O'Mahony Pike Architects (OMP), to make this submission to the *Draft Edenderry Local Area Plan 2023-2029* which was published on Thursday, 15<sup>th</sup> December 2022.

Our clients are the owners of a site located within Edenderry Business Campus, c. 1.5km west of Edenderry Town Centre and adjacent to the R441 (Rhode Road) Regional Road and Monasteroris Business Campus (Refer to Figure 2.2).

The overall landholding has two land use zoning objectives 'Business/Employment' and 'Industrial' (as per the *Edenderry Local Area Plan 2017-2023*). This Submission relates only to the area of the site currently zoned 'Business/Employment' and which is proposed to be zoned to 'Enterprise and Employment' according to the *Draft Edenderry Local Area Plan 2023-2029*

In summary, this Submission seeks that the proposed land use zoning objective ('Enterprise and Employment') be revised to '**New Residential**' under the *Edenderry Local Area Plan 2023-2029*, which seeks to '*provide for new residential development and other services incidental to residential development*

This Submission is made before the consultation period closes on Friday, 3<sup>rd</sup> February 2023.

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## 1.1 Executive Summary

The key arguments for rezoning the subject site to residential use are outlined throughout this Submission and are summarised as follows:

- Edenderry is strategically located in the Eastern and Midland Regions, on the edge of the Greater Dublin Area and proximate to the M4 (Dublin – Galway/Sligo) Motorway. The subject site (c. 2.9 ha) is within Edenderry environs and walking distance of existing employment areas and key community infrastructure.
- The rezoning of the subject site to ‘New Residential’ fully accords with the principles of achieving ‘compact growth’, as identified in the *Project Ireland 2040 National Planning Framework* (NPF) and the *Regional Spatial Strategy for the Eastern and Midland Area* (RSES), which supports new residential development with access to sufficient social and community infrastructure.
- Edenderry is defined as a ‘Self-Sustaining Town’ (as defined in the RSES), alongside Portarlinton, in County Offaly.
- Recent studies strongly suggest that an increase in housing targets, above what is set out in the National Planning Framework (NPF), is needed due to Ireland’s rapidly growing population.
- The Core Strategy of the *Offaly County Development Plan 2021-2027* (‘Development Plan’) estimates that the population of Edenderry will increase during the lifetime of the Development Plan, thereby suggesting that amendments to the land use zoning objectives within the new *Edenderry Local Area Plan 2023-2029* is required to meet demand.
- In terms of accessibility, the subject lands are strategically located adjacent to the R441 and north of the R402, which in turn connects to the M4 motorway and beyond. Additionally, the new Edenderry Inner Relief Road (construction commencing Q2-2023) bounds the northern site boundary and will be complete in 2024.
- An Indicative Masterplan has been prepared by OMP Architects to accompany this Submission which shows how the subject lands could potentially form part of a local mixed use centre, noting the adjoining ‘Open Space’ zoned lands to the south which could potentially be used by future residents and the public for recreational use.
- The lands to the west of Edenderry are a logical extension of the existing town. As such, the expansion of the settlement will complement current plans for the area and promote compact growth within the town.

We therefore urge the Planning Authority to ensure that sufficient residentially zoned land is allocated within the *Edenderry Local Area Plan 2023-2029* to ensure residential dwellings are delivered in a timely manner to respond to projected population growth and the ongoing housing crisis.

## 2.0 SITE CONTEXT

### 2.1 Subject Site and Urban Context

Edenderry is located in the centre of the Eastern and Midland Region and within c. 2km of the Offaly and Kildare county borders. The subject site (c. 2.9 ha) is located at a strategic location to the west of Edenderry Business Campus, adjacent to the R441 and c. 1.5km west of Edenderry Town Centre (see Figure 2.1).



Figure 2.1: Location of our client's lands indicated by a red star (Source: webapps.geohive.ie, cropped and annotated by TPA, 2023.)

The lands comprise maintained grassland and have pre-existing access via a roundabout to the north, which in turn connects to a two-way distributor road (incl. pedestrian and cyclist paths) and the R441. The approved Edenderry Inner Relief Road (Part 8 Scheme) bounds the northern site boundary and is due for completion in 2024. This will significantly increase accessibility to the subject site from the existing services and employment areas within Edenderry.

The lands are fully serviced by existing infrastructure (foul, drainage and water supply) which was implemented as part of the Edenderry Business Campus (See Section 2.3 of this Submission).

The boundaries of the site are defined by the distributor road to the north, mature vegetation and a low stone rubble wall to the south and east and a low stone wall with railings above to the west. A shared pedestrian and cycle pathway also bounds the site to the west along the R441.



**Figure 2.2: Aerial image shows the subject site (red outline) and the adjoining lands owned by Gambara Limited (Source: Google Earth, annotated by TPA, 2023.)**

There are no Protected Structures or Recorded Monuments (SMR) located within the subject site. Within the wider vicinity, there is a ringfort (Ref. OF012-002----) located in the adjoining lands to the south.

Additionally, the subject site is not located within a Natural Heritage Area (NHA) or European Site (Natura 2000 site) as designated under the Habitats Directive (92/43/EEC), Birds Directive (2009/1477/EC) and the *Planning and Development Act 2000* (as amended). The closest European site is the Long Derries, Edenderry SAC, located c. 5.5 km to the south-east of the site.

## 2.2 Surrounding Context

As noted previously, the lands form part of the *Edenderry Local Area Plan 2017-2023* (Refer to Section 5.2 of this Submission) and are located within the LAP boundary on its western edge.

The wider area is generally characterised by a mix of residential, agricultural, commercial, open space and employment uses. For example, lands to the north, west and south-west of the site are developed and used for agricultural and residential use. Lands to the east and south-east comprise established warehouse/industrial developments, with some plots remaining undeveloped. There are a number of residential developments located further south and south-west of the site along Corkery Lane. In terms of public transport, there is a bus stop within c. 350m of the subject site to the south-east on Corkery Lane which provides westward services to Tullamore, and eastward services to Dublin.

In the wider urban context, the subject site is proximate to Edenderry Town Centre. There are also a number of schools within a short distance of the site, namely, Edenderry National School, Gaelscoil Éadain Doire and Scoil Bhríde Primary School, amongst others. Edenderry also hosts a large range of industrial and enterprise businesses.

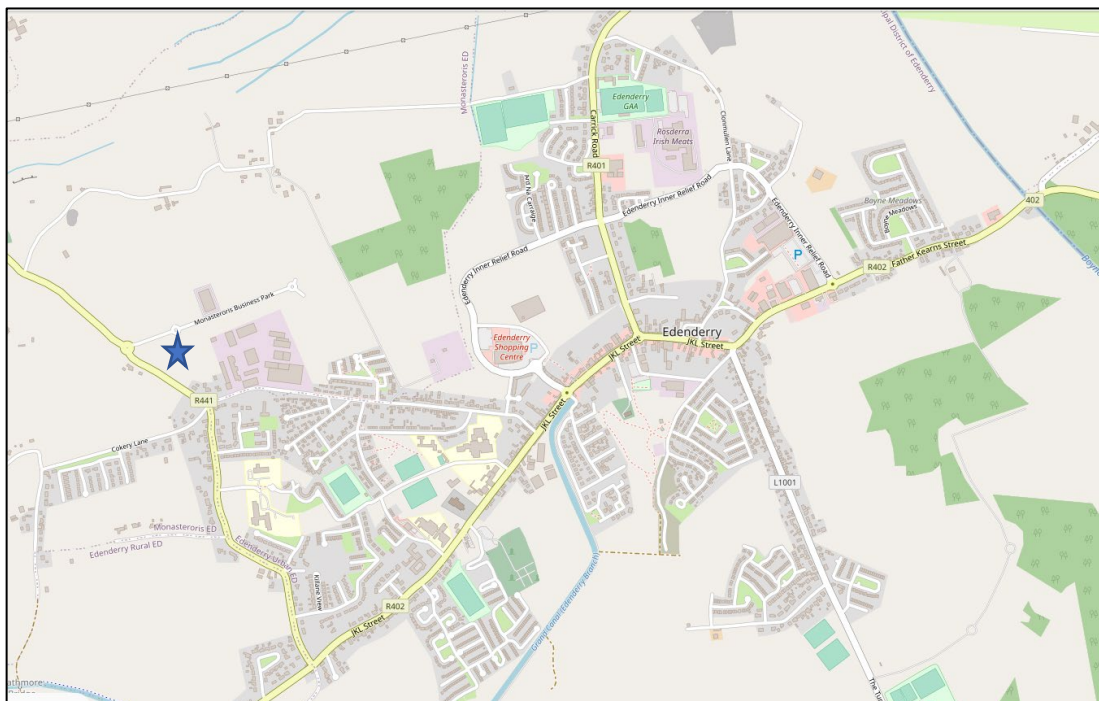


Figure 2.3: Subject site (blue star) in the context of Edenderry and the surrounding area (Source: EPA Maps, cropped and annotated by TPA, 2023.)

Considering the mixed use nature of the surrounding lands uses, in conjunction with the adjoining open space, it is our opinion that this area of Edenderry is capable of supporting a mixed use local centre comprising day-to-day facilities and services for local residents, as well as an appropriately designed residential development on the subject site. We refer to the Planning Authority to Appendix A which includes an Indicative Masterplan, prepared by OMP Architects, showing how the subject lands and the adjoining site could be developed in the future.

## 2.3 Planning History

Tom Phillips + Associates conducted a planning history search using online search facilities of Offaly County Council and An Bord Pleanála websites in order to establish the planning history of the subject site and relevant planning history in the immediate environs.

In summary, there are no planning applications pertaining to the subject site specifically. However, there are a number of planning applications relating to the lands in the wider vicinity which are mainly from pre-2010 and relate primarily to the Monasteroris Business Campus, the Edenderry Business Campus and the existing residential developments (See Figure 2.4).

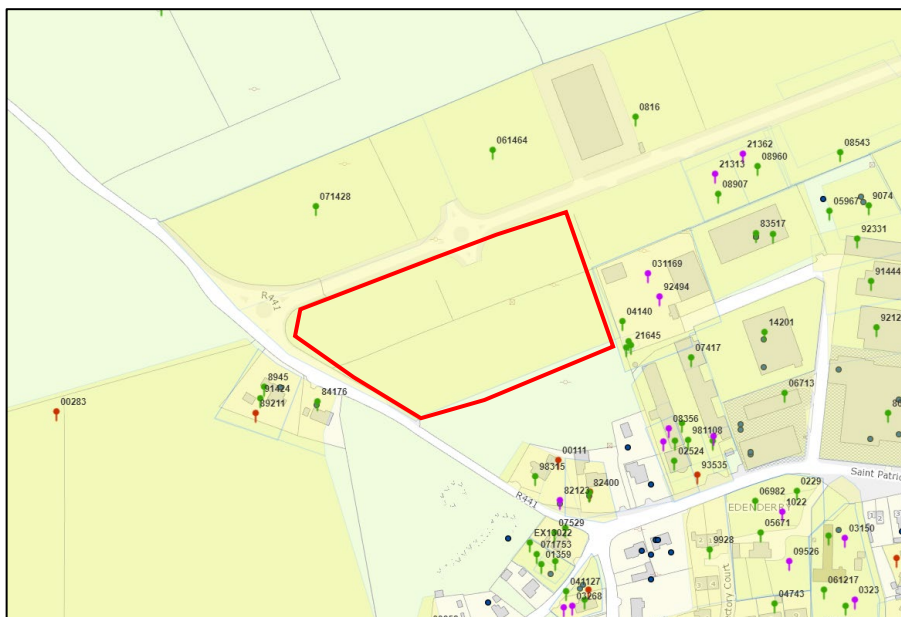


Figure 2.4: Planning applications within the wider vicinity of the site (Source: <https://offalycoco.maps.arcgis.com/apps/webappviewer>, cropped and annotated by TPA, 2023.)

Three planning applications, Reg. Refs. 06/1464, 07/1428 and 08/16, permitted development within the wider Edenderry Business Campus and are summarised below.

### 2.3.1 Planning Application Reg. Ref. 06/1464 - Light Industrial / Warehouse Units

Channor Limited applied for planning permission on 2<sup>nd</sup> June 2007 for a development comprising the construction of 21 No. single storey light industrial/warehouse units with two-storey office areas in 3 No. blocks, together with infrastructural works to include roads, drainage, a substation, parking and associated site works, a new access road from R441 Rhode Road, widening of and improvement works to the R441, low stone wall with railings over at new entrance with pedestrian and vehicular gates.

Planning Permission was subsequently granted for the proposed development by Offaly County Council on 25<sup>th</sup> July 2007. There are no further details available on the planning portal regarding this planning application.

### 2.3.2 Planning Application Reg. Ref. 07/1428 - Retail Units

Lanmeur Limited applied for planning permission on 24<sup>th</sup> September 2007 for a development comprising the construction of 1 No. block of 8 No. single-storey retail units ranging in area from c. 433 sq m to c. 2,949 sq m (total Gross Floor Area c. 6,354 sq m), a substation, waste management facility, associated car parking and site works, including stone wall and railing boundary treatment.

Planning Permission was subsequently granted for the proposed development by Offaly County Council on 15<sup>th</sup> April 2008. There are no further details available on the planning portal regarding this planning application.

### 2.3.2 Planning Application Reg. Ref. 08/16 – Alterations to Reg. Ref. 06/1464

Channor Limited applied for planning permission on 16<sup>th</sup> January 2008 for a development comprising alterations to a previously approved light industrial / warehouse building (Reg. Ref. 06/1464) to comprise re-subdivision of block with an increase in footprint, a reduction in first floor areas, changes to elevations, parking and site works and construction of a sub-station.

Planning Permission was subsequently granted for the proposed development by Offaly County Council on 22<sup>nd</sup> May 2008. Block 6, as shown in Figure 2.5, has been built, while the remainder of the land is undeveloped.

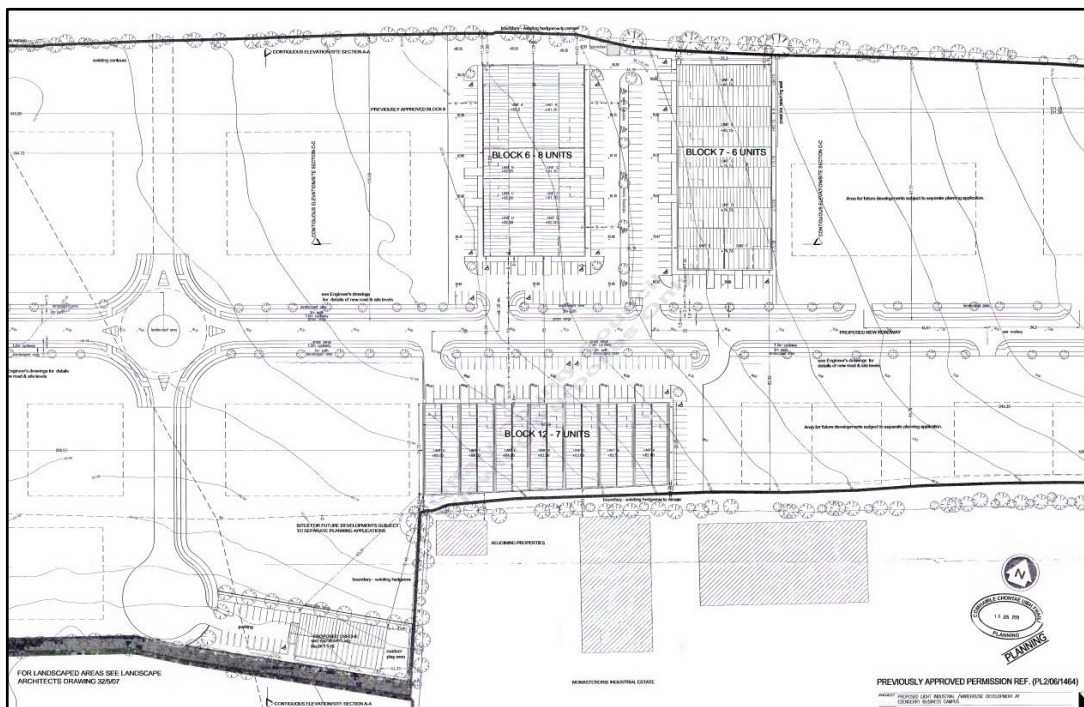


Figure 2.5: Extract from Drawing No. 0708-16 (Part Site Plan Previously Approved) (Source: [eplanning.ie/OffalyCC](http://eplanning.ie/OffalyCC), cropped by TPA, 2023.)

In conclusion, the planning history of the adjoining lands does not suggest any inherent difficulties in respect of any proposed future development of the subject site.



### 3.0 STRATEGIC POLICY AND GUIDELINES

#### 3.1 *Project Ireland 2040 National Planning Framework (NPF)*

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

Some of the key National Policy Objectives (NPO) included in the NPF in terms of the need for additional housing are as follows:

NPO 3a: *'Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.'*

NPO 3c: *'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.'*

It is submitted that the subject site is located within the boundary of Edenderry, within walking distance of employment centres, educational uses and Edenderry Town Centre. In this context, it is considered that the rezoning of this subject site to 'New Residential' is consistent with the objectives of the NPF in seeking to consolidate development served by existing community/social infrastructure. The scale and configuration of the site will also fully accord with the principles of 'compact growth'.

#### 3.2 **Regional Spatial Economic Strategy (RSES) - Eastern and Midland Regional Assembly, 2019-2031**

The purpose of the RSES is to support the implementation of *Project Ireland 2040* by providing a long-term strategic planning and economic framework for the development of the Regions. The *RSES* defines Edenderry, alongside Portarlinton, as a 'Self-Sustaining Town', which are described as:

*'Self-Sustaining Towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery.'*

The RSES also recognises that Edenderry (alongside Birr) within County Offaly plays a key role within the county as a retail centre (Level 3), just below Tullamore in terms of importance.





Figure 3.1: Edenderry (yellow star) in the context of the Settlement Strategy of the Eastern and Midland Region (Source: RSES EMRA, cropped and annotated by TPA, 2023.)

Of particular relevance to this rezoning Submission is the following Regional Policy Objective:

RPO 3.2: *‘Local authorities, in their core strategies shall set out measures to **achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.**’ (our emphasis.)*

As the subject site inherently benefits from existing infrastructure, it is submitted that the rezoning of the lands to support the delivery of much needed residential uses is fully consistent with the policy objectives of the RSES, supporting the delivery of housing in this part of the Region.



### 3.3 Housing Supply Target Methodology for Development Planning

Section 28 Guidelines 'Housing Supply Target Methodology for Development Planning, 2020' notes the requirement of Development Plans "to undertake a Housing Need Demand Assessment (HNDA) as part of its housing strategy in accordance with National Policy Objective (NPO) No. 37 of the National Planning Framework". These Guidelines further note that housing strategies at the Development Plan and Local Area Plan level must take into account and plan for the identified population growth within the NPF.

To this end, the Department commissioned the ESRI to project structural housing demand on a per county basis. The relevant figures applicable to County Offaly are contained in Appendix 1 of the Guidelines (See Figure 3.2).

Table 11: Offaly County Council		Annual Average	Total Households
<b>A</b>	ESRI NPF scenario projected new household demand 2017 to 2031	375	5,621
<b>B</b>	Actual new housing supply 2017-19	157	472
<b>C</b>	Homeless households, and estimated unmet demand as at Census 2016	N/A	114
<b>D</b>	<b>Housing Demand 2020-31 =Total (A-B+C)/12</b>	<b>439</b>	<b>5,623</b>

Figure 3.2: Extract from Appendix 1 – Projected Housing Demand by Local Authority Area 2020-2031. ESRI NPF Scenario Housing Supply Target (Source: Department of Housing, Local Government and Heritage, 2020, cropped by TPA, 2023.)

The Guidelines note that CSO data relating to housing completions is now published on a quarterly basis. The utilisation of this data can thus facilitate the monitoring of housing delivery across local authorities and can significantly increase the frequency with which housing delivery can be benchmarked against identified housing demand projections.

It is thus clear that the Department seeks to ensure that housing targets at county and local level are not just theoretically zoned for or permitted, but rather are delivered as specified in the relevant Plan showing a clear record of housing completions within the lifetime of the relevant plan.

In the context of Edenderry, and using the housing demand figures contained within the *Draft Edenderry LAP 2023-2029*, this means that 323 No. residential units at a minimum will need to be completed in order to satisfy population growth and subsequent housing demand. Failure to meet this housing target will be clearly evident using the CSO monitoring data outlined above and will serve to compound housing demand in the town.

The delivery of housing units in the town within the lifetime of the new LAP is of critical importance to ensure that the town can grow and to ensure that acceptable accommodation is available to the town's residents.



#### 4.0 RESIDENTIAL LAND SUPPLY STUDY (2022)

Savills (Property Advisors) published a *Residential Land Supply Study* on 4<sup>th</sup> October 2022 which revealed that there has been a reduction of zoned residential land with a potential capacity for over 100,000 units within the Greater Dublin Area (GDA) alone<sup>3</sup>. This, the report states, has been driven by the national planning policy outlined in the National Planning Framework (NPF). One of the key targets of the NPF is to direct development to brownfield sites in and around core urban areas, however, this has proven to hamper the supply of much needed residential units at a time of acute demand. The report states:

*'...it is now required that 40% of delivery take place on brownfield sites, i.e. sites already within urban areas. These sites are more expensive to develop due to logistical and environmental factors, being smaller in scale, as well as having legacy ownership structures which complicate delivery. If we really want to plan properly, the councils would need to put in place a system where they can reasonably ascribe a probability for each site such that an overall projection of likely supply is achievable within the timeframe of a plan. For the councils, this would require additional resources not currently at their disposal. The reality is that many of these brownfield sites are not going to proceed for a variety of factors, thus ensuring housing delivery targets are missed in the coming years.'* (our emphasis)

The report also provides that the reduction in residentially zone land has been driven by the NPF rather than by the Local Authorities themselves. The report outlines 4 No. fundamental obstacles halting delivery within the NPF are summarised as follows:

- Reduction of essential land for development.
- Inaccurate population projections and forecasting models which envisions growth split 50:50 between Dublin and the rest of the country and targets housing supply accordingly.
- Lack of flexibility on targets and timelines.
- Rigid site development rules e.g. 40% of the delivery of new homes must take place on brownfield sites.

The report concludes that the NPF is fundamentally flawed and will exacerbate the housing crisis. On foot of this study, the Minister for Housing announced that the Government is reviewing the NPF to assess how much zoned residential land is needed across the country based on the latest census data. We note that the 2022 Census Preliminary Results indicate that the population of Ireland stood at 5,123,536 persons, which is the highest figure on record for a census since 1841<sup>4</sup>. Although the Development Plan estimates a population increase of c. 721 for Edenderry, the factual demand will become evidently clear when the final results of the 2022 Census are released during 2023.

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<sup>3</sup> Edenderry is located on the fringes of the GDA.

<sup>4</sup><https://www.cso.ie/en/releasesandpublications/ep/p-cpr/censusofpopulation2022-preliminaryresults/introduction/>

## 5.0 LOCAL PLANNING POLICY

### 5.1 Overview

This Section examines the planning and development context of the lands with specific reference to the *Edenderry Local Area Plan 2017-2023* and *Offaly County Development Plan 2021-2027*, which are currently the statutory plans governing the subject site.

### 5.2 Edenderry Local Area Plan 2017-2023

The *Edenderry Local Area Plan 2017-2023* ('LAP') sets out the overall development and growth strategy, including policies and objectives, for the proper planning and sustainable development of the Edenderry area. The primary aim of the LAP is for the consolidation and coherent economic growth of the town, and this is reflected in the quantum and spatial arrangement of the residential zonings.

The subject site is zoned 'Business/Employment' as per the previous County Development Plan (*Offaly County Development Plan 2014-2020*). Business / Employment zoned lands are described as follows:

#### Business / Employment Zoning Objective

*'The use of land as 'Business/Employment' shall be taken to include the use of land for primarily commercial and business use, including light industry / warehousing and the facilitation of enterprise park / office park type use, as appropriate.'*

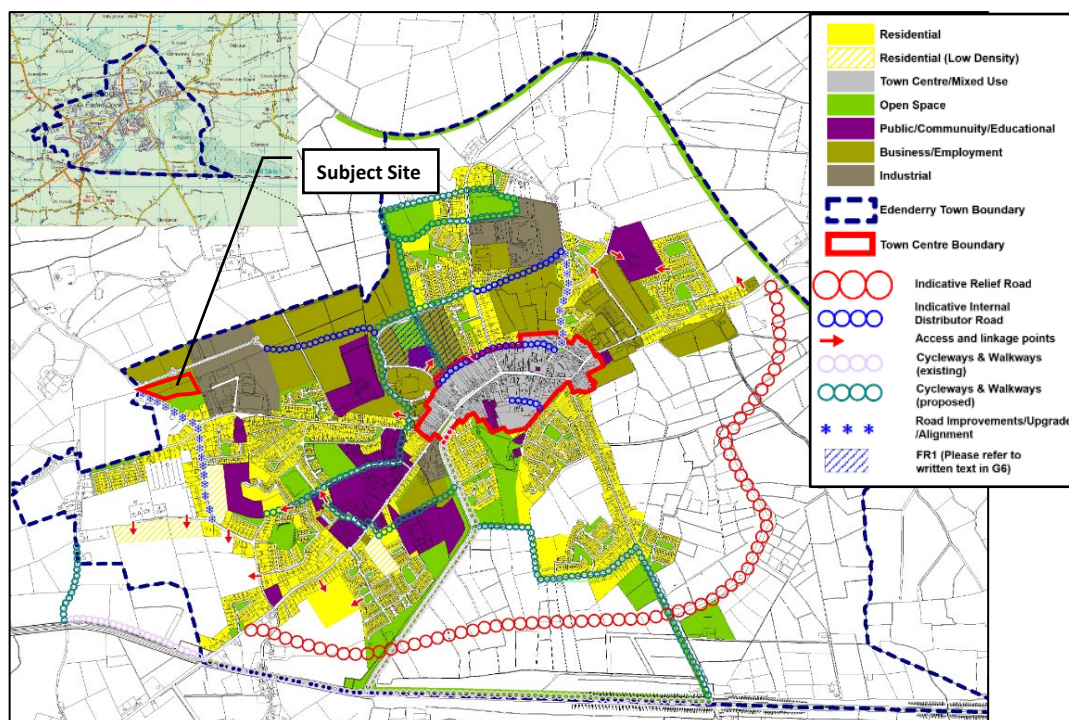


Figure 5.1: Extract from the *Edenderry Local Area Plan 2017-2023* Land Use Zoning Map showing the location of the subject site outlined in red (cropped and annotated by TPA, 2023.)



The land use zoning map shows that the subject site lies directly adjacent to undeveloped land zoned 'Open Space' (south) and 'Industrial' (east) (Refer to Figure 5.1). The lands directly opposite the site to the west are 'unzoned' but are developed for residential/agricultural purposes. Lands further south of the site, along Corkery Lane and St. Patrick's Roads, are primarily zoned as 'Residential'.

The land use zoning map also shows a 'Road Improvement/Upgrade (Alignment)' objective along the western site boundary (R441) and an 'Indicative Internal Distributor Road' objective further east of the site. We note that the construction of this 'indicative' distributor road is to commence in Q2 2023 and is due for completion in c. 2024.

### ***Quantum of Residential Land v Employment Lands***

We further note that the current land use zoning map for Edenderry includes c. 16 ha of undeveloped lands zoned for residential purposes. The LAP makes provision for c. 128 No. residential units to accommodate a population growth of 358 No. persons during the lifetime of the LAP i.e. 2.79 persons per household.

Section 8.3.3 of the LAP also notes that *'there is a considerable amount of land zoned for business/ employment use in the Edenderry local area plan 2017 to 2023 – this is to provide a range of opportunities for employment related development as set out in G1<sup>5</sup> of this plan.'*

Based on our review of the LAP Land Use Zoning Map and aerial view imagery of Edenderry spanning from 2006 to 2021, it appears that much of the lands zoned for 'Business/Employment' remain largely undeveloped.

Given the large quantum of lands zoned as 'Business/Employment' in Edenderry at present, it is our view that rezoning the subject site to 'New Residential' would not weaken future economic development opportunities within the town environs and Edenderry Business Campus.

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<sup>5</sup> G1 of the LAP relates to 'Employment and Enterprise'.



### 5.3 *Offaly County Development Plan 2021 – 2027*

The *Offaly County Development Plan 2021-2027* ('Development Plan') came into legal effect on 22<sup>nd</sup> October 2021. One of the key purposes of the Development Plan is to ensure that the overall supply of housing within the county is sufficient to meet the needs of the existing and future population.

Edenderry is listed as a 'Self-Sustaining Town' and is described by the Development Plan as follows:

*'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'.*

The Core Strategy (Chapter 2) of the Development Plan provides a rationale for the amount of land proposed to be zoned residential and a mix of residential and other uses. It identifies the quantum, location and phasing of development for the 2021-2027 period linked back to a county population target, in the form of a settlement hierarchy. The county's population was 77,961 in the 2016 Census, while the 2022 Census Preliminary Results indicate that the county had a population of 82,668 (c. 6% increase). The Development Plan anticipates that the population of County Offaly will increase by 9,239 persons during the course of the Plan.

Additionally, the Core Strategy places a strong emphasis on 'compact growth', with an aim of directing future development to the county's larger settlements, including Edenderry. The Development Plan predicts that the population of Edenderry alone will increase by 721 No. persons over the lifetime of the Plan, which is effectively double the population growth predicted for the 2014-2020 period.

The Development Plan does not specify:

- the quantum of land required to be zoned as 'New Residential';
- the number of residential units that can be accommodated on brown / infill sites; or
- the residential units that can be accommodated on brownfield / infill sites as a percentage of all proposed residential units in the settlement (in order to strive to satisfy 30% within).



Instead, Section 2.3 of the Development Plan includes the following Core Strategy Objective:

**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.'* (our emphasis.)**

In accordance with the above, the *Draft Edenderry Local Area Plan 2023-2029* identifies land zoned for 'New Residential' use to accommodate the projected population growth for Edenderry.

We submit that it is prudent that the Planning Authority ensures that the zoning objectives proposed within the LAP are consistent with the population target and housing allocation for Edenderry as contained within the Development Plan's Core Strategy which suggests that a large quantum of land suitable for new residential developments will be required.

It is clear that the Development Plan supports the rezoning of additional residential zoned land to cater for an additional c. 721 persons. We further note that recent studies suggest that the population projections with county Development Plans may be outdated and housing targets may need to be increased based on the preliminary findings of the 2022 Census Preliminary. Therefore, we urge the Planning Authority to plan accordingly to cater for the projected population increase.

For the reasons expanded upon in Section 9.0 of this Submission, it is clear the subject site is appropriate for residential development and therefore should be zoned for new residential use accordingly.

## 6.0 DRAFT EDENDERRY LOCAL AREA PLAN 2023-2029

### 6.1 Introduction

Offaly County Council published the *Draft Edenderry Local Area Plan 2023-2029* ('Draft LAP') on 15<sup>th</sup> December 2022. The Plan will aim to guide the overall development of Edenderry until 2029.

### 6.2 Proposed Land Use Zoning Objective

According to the *Draft Edenderry Local Area Plan 2023-2029* ('Draft LAP') Zoning Map, the subject site is proposed to be zoned 'Enterprise and Employment' in accordance with the Development Plan, with has an objective to 'provide for enterprise and employment development'. (Refer to Figure 6.1). The overall aim of this land use zoning objective remains largely the same as the 'Business/Employment' in the current LAP.

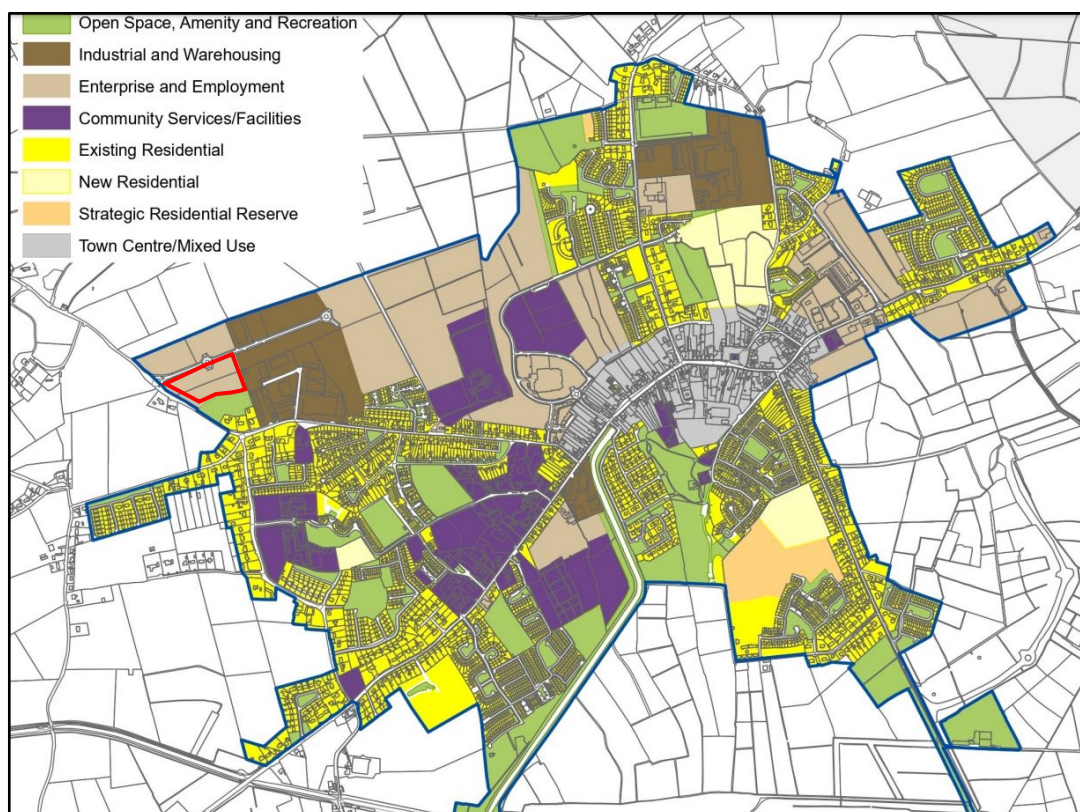


Figure 6.1: Extract from the *Draft Edenderry Local Area Plan 2021-2027* - Zoning Map showing the location of the subject site outlined in red (cropped and annotated by TPA, 2023.)

The Draft LAP Zoning Map shows that the subject site lies directly adjacent to land zoned 'Open Space, Amenity and Recreation' (south) and 'Industrial and Warehousing' (east). The lands directly opposite the site to the west remain as 'Unzoned Lands'.

We further note that the existing and proposed infrastructure and cycle networks have been removed from the Land Use Zoning Map and are instead shown on maps contained within Appendix 2 'Local Transport Plan' of the Draft LAP.





The Draft LAP includes a number of Key Strategic Aims, of which the following is most relevant to this Submission:

Strategic Aim 9: Planning and Infrastructural Assessment

*'To phase new development to ensure that it occurs in a sequential and efficient manner and in tandem with the delivery of supporting physical and social infrastructure.'*

We submit that the rezoning of the subject site for new residential purposes will be in accordance with the above strategic aim for the development of fully serviced lands within existing settlements which are capable of supporting residential use to fulfil the identified core strategy requirement.

### 6.3 Land Zoned 'New Residential' in the Draft LAP

According to Section 1.3.4 of the Draft LAP, 10 ha of 'New Residential' zoned land has been identified within Edenderry to cater for the delivery of 323 No. new residential units. It is stated that the development strategy of the LAP is based on the projected population growth of c. 721 No. persons as outlined in the Core Strategy of the Development Plan.

Section 5.3.1 of the Draft LAP outlines that sites within Edenderry have been assessed and zoned for future development based on the 'Tiered Approach to Land Zoning', stating:

*'Appendix 3 of the National Planning Framework (NPF) requires the plan to adopt a Tiered Approach to Land Zoning. On foot of this, a Planning and Infrastructural Assessment (PIA) was prepared to assess the suitability of lands in Edenderry for future development. This assessment (Chapter 10) provides an assessment of potential sites for future development on the basis of serviceability/infrastructural/planning grounds. The PIA assists in the designation of lands as either Tier 1 lands (lands that are already serviced) or Tier 2 lands (lands that are serviceable within the life of the plan) and identifies the likely development services required to support new development. An indicative timeframe for delivery of critical infrastructure is also provided.'*

As part of the Planning and Infrastructural Assessment (PIA), the Planning Authority undertook a review of potential sites for future development within Edenderry and this is included in Section 10.2 of the Draft LAP. A range of potential development sites were identified (Refer to Figure 6.2) which were further examined in terms of their suitability for development and zoning. Of 24 No. sites identified, 3 No. were identified as being capable of accommodating new residential development ('Site 1', part of 'Site 5' and 'Site 14'), outlined in orange and red in Figure 6.2.

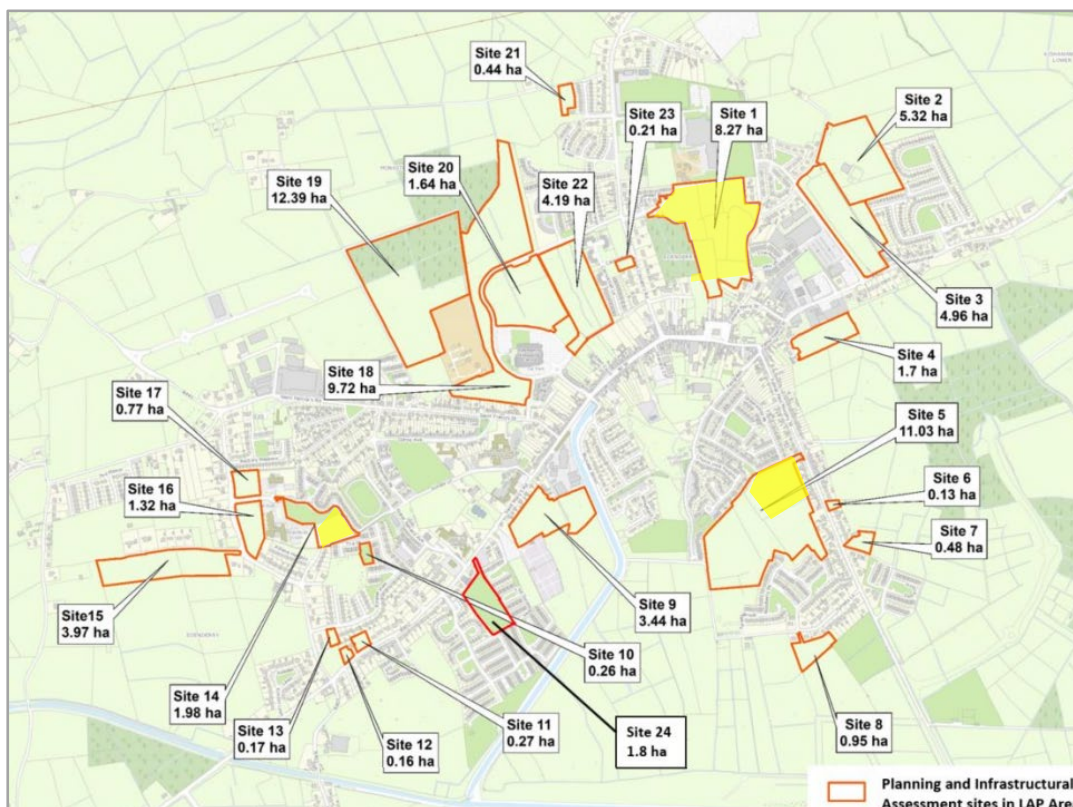


Figure 6.2: Location of sites assessed as part of the PIA undertaken by the Planning Authority. 'New Residential' zoned lands are highlighted blue (Source: Draft LAP, cropped and annotated by TPA, 2023.)

Using the Draft LAP Zoning Map, we have highlighted in yellow the 3 No. sites identified by the PIA as being suitable for new residential development and are proposed to be rezoned to 'New Residential'. It is unclear what size each of the lands zoned 'New Residential' are, however, it is assumed that when combined, they equate to 10 ha.

There is no evidence in the Draft LAP to suggest that a high-level feasibility study has been undertaken by the Planning Authority to assess the capability and capacity of these lands to support the delivery of 323 No. new residential units. Furthermore, given the limited scope of lands zoned for new residential purposes within Edenderry overall, it is clear the onus lies on a limited number of landowners to deliver a large number of units during the lifetime of the LAP.

We submit that the lands to the west of Edenderry Business Campus owned by our client are capable of supporting the delivery of c. 70 No. residential units as demonstrated by the accompanying Indicative Masterplan, prepared by OMP Architects, and by Section 9.0 of this Submission. We further confirm that our client is committed to processing and delivering a high-quality residential scheme should the subject site be rezoned to 'New Residential'.

## 6.4 Edenderry Local Transport Plan (LTP)

As discussed in Section 6.2, Appendix 2 of the Draft LAP includes a Local Transport Plan (LTP) for Edenderry which has been prepared in accordance with 'Area Based Transport Assessment Guidance' by Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA).

The Draft LTP examined the existing and proposed transport infrastructure and service provision across all modes of transport, including walking and cycling in Edenderry. Specific infrastructure objectives which promote sustainable transport are included in Appendices A, B and C of the Draft LTP.

Section 9.0 of this Submission discusses the subject site in the context of infrastructure, both existing and proposed within the vicinity of the site.

## 7.0 INDICATIVE MASTERPLAN

As noted previously, OMP Architects have prepared an Indicative Masterplan to accompany this Submission (See Appendix A) which shows how the subject site can accommodate the provision of c. 70 residential units. Our client also owns a significant area of land zoned for open space purposes (c. 1.2 ha) but would be happy to facilitate these lands being used for public amenity purposes as part of a wider Masterplan for the lands. The archaeological feature (ringfort) within the open space lands could then be preserved and integrated into a wider publically accessible open space amenity area, which would not only be of benefit to nearby residencies, but also the wider town. The Masterplan also shows the inclusion of a landscaping zone along the eastern boundary which can act as an acoustic/visual buffer between future residential uses and the adjoining industrial / warehousing zoned lands.

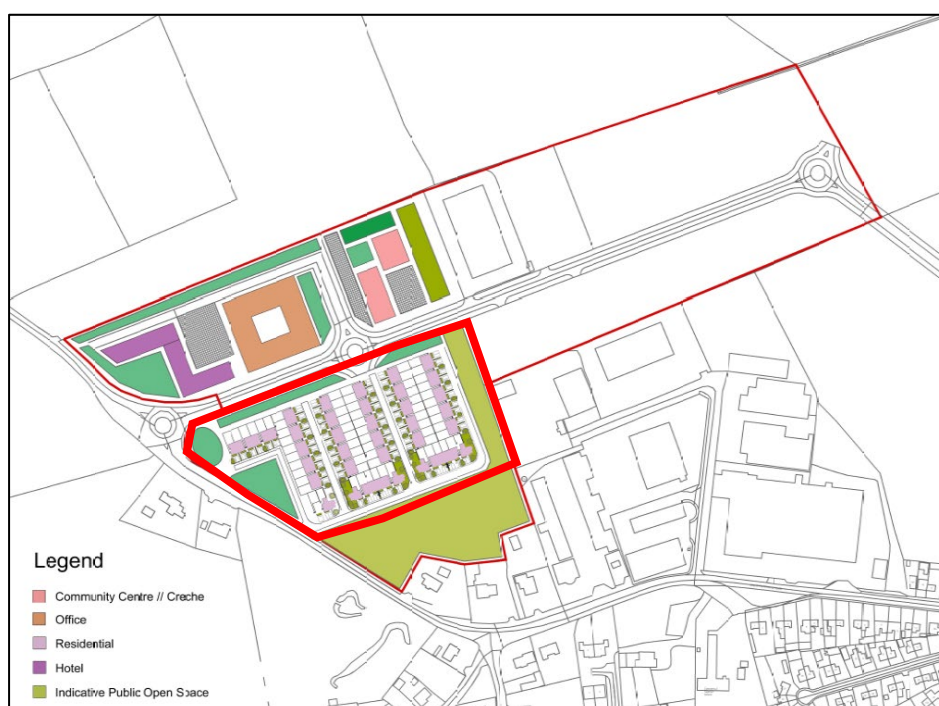


Figure 7.1: Indicative Masterplan with the subject site outlined in red (Source: OMP Architects, cropped by TPA, 2023.)



The Indicative Masterplan also demonstrates how residential uses on the subject site could interface with the northern lands should it be developed with a mix of uses (community / office / hotel / open space) which supports the local community, whilst simultaneously providing employment uses in accordance with the proposed land use zoning objective 'Enterprise and Employment' (as per the Draft LAP).

## 8.0 DEVELOPMENT PLAN GUIDELINES

### 8.1 Introduction

As noted previously, the zoning objectives proposed under LAP must be consistent with the population target and housing allocation set out in Core Strategy Table 2.2 of the Development Plan.

The *Development Plans, Guidelines for Planning Authorities, 2022* ('The Guidelines') concerning the zoning of land, sequential zoning, additional provision and phasing are therefore relevant to this Submission and are discussed in more detail below.

### 8.2 Sequential Approach to Land Use Zoning

The Guidelines advocate for a sequential approach to zoning of land for residential use which reflects the compact growth, utilisation of existing infrastructure and town regeneration national policy objectives of the NPF and the 'Tier Approach' to land zoning.

The NPF two-tiered approach to land zoning, as outlined in Appendix 3, comprises:

Tier 1: Serviced Zoned Land:

*'This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development*

*These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands...'*

Tier 2: Serviceable Zoned Land:

*'This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.*

*These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement...'*

Based on the above definitions, it is our opinion that the subject site falls within the 'Tier 1' category given that the lands are within an existing settlement, are fully serviced by existing infrastructure and can therefore readily support residential development.

Further to the above, Section 6.2.3 of the Guidelines outlines a 'Sequential Test for Residential Zoning in Settlements' consisting of four key steps:

Sequential Test for Residential Zoning in Settlements	
<b>STEP 1:</b>	As outlined in Chapter 4, the core strategy of the development plan will be formulated and provide a housing unit targets for settlements and rural areas This will be based on a <b>Settlement Capacity Audit</b> providing estimates of housing yield for (i) Serviced [Tier 1] lands and (ii) Serviceable [Tier 2] lands in settlements.-
<b>STEP 2:</b>	n accordance with the <b>Sequential Test</b> , identified lands with potential for new residential development that are situated within or closest to the settlement core (including brownfield, infill and redevelopment sites) shall be zoned to facilitate residential development with/without other land uses as appropriate to fulfill the identified core strategy requirement. This exercise should be based on an assessment of the quantum of housing to be delivered on individual sites or land parcels, such that when aggregated, there is sufficient capacity to deliver the core strategy housing target for the subject settlement.
<b>STEP 3:</b>	Where it is necessary to zone serviced, but spatially less central lands (i.e. 'Tier 1' lands) to meet core strategy requirements, these shall be identified and prioritised on a spatially sequential basis (i.e. with those most proximate to the core, given preference, and first zoned for development). As part of this process, estimates of housing yield from such zonings must be considered against <b>Core Strategy</b> requirements.
<b>STEP 4:</b>	Subsequently, where it is also necessary to zone unserviced, but serviceable, spatially less central lands (i.e. 'Tier 2' lands) in order to meet core strategy requirements, these shall be identified and prioritised on a spatially sequential basis (i.e. with those most proximate to the core, given preference and first zoned for development). Clear estimates of housing yield from such zonings must be considered against <b>Core Strategy</b> requirements.

**Figure 8.1: Sequential Test for Residential Zoning in Settlements (Source: *The Development Plans, Guidelines for Planning Authorities, 2022*, cropped by TPA, 2023.)**

The sequential test encourages the zoning of 'Tier 1' lands to residential use in the first instance.

As identified previously, the Core Strategy of the Development Plan sets a requirement for an additional 323 No. residential units to cater for a population increase of 721 No. persons. It identifies 10 ha of 'New Residential' zoned land within the existing built-up footprint of Edenderry to accommodate the projected population increase. In addition, as discussed in Section 4.0 of this Submission, it has been suggested that, in reality, the housing targets as set out in the NPF may need to be increased based on the recent population growth trends. Therefore the housing allocation for Edenderry as set out in the Development Plan until 2029 may need to be reviewed once the final 2022 Census Data becomes available.



For reasons outlined throughout this Submission, we submit that the lands to the west of Edenderry Business Campus could play a pivotal role in addressing the future housing need within the settlement and within the County. In our view, rezoning the subject site from 'Business/Employment' to 'New Residential' will ensure there is an adequate supply of residentially zoned lands within the town which supports compact growth in accordance with the NPF Policy Objectives.

We, therefore, urge the Planning Authority to ensure that appropriate policies are included in the *Edenderry Local Area Plan 2023-2029* to safeguard development in the town and ensure Edenderry has the capacity to grow in line with the settlement strategy.

## 9.0 SUITABILITY OF THE SUBJECT SITE FOR RESIDENTIAL ZONING

We contend that the subject site is inherently suitable for residential use and that the proposed zoning of the lands as '**Enterprise and Employment**' as per the Draft LAP should be revised to '**New Residential**' in the adopted *Edenderry Local Area Plan 2023-2029*.

### 9.1 Acute Need for Housing

There is a clear need for additional residential development to cater to an anticipated population increase of 721 No. persons in appropriate locations in Edenderry as quantified in the Development Plan. The town's location proximate to Tullamore, Portarlinton and the GDA has meant that it has experienced significant population growth rates over the past decade (29% increase between 2002 and 2006, 18.5% increase between 2006 and 2011 and a 5% increase between 2011 and 2016). Further to this, the 2022 Census Preliminary Results<sup>6</sup> indicate that the population of Edenderry is currently c. 7,502 persons. This is an increase from 7,001 persons reported in 2016 (CSO), representing a c. 7.1% increase since the 2016 Census.

Edenderry's designation as Self-Sustaining Town with high-quality transport links is strategically located between the M4 (Dublin – Galway/Sligo) and M7 (Dublin – Limerick) Motorways and can accommodate additional residential densities.

### 9.2 Existing and Proposed Roads Infrastructure

Edenderry has a number of regional roads that converge in the town, namely the R401, R402 and R441. The R441, which adjoins the subject site for the full extent of the western boundary, connects Edenderry to Rhode to the north-west and Clonbullogue and Rathangan to the south. The lands have pre-existing access to the R441 (vehicular/pedestrian/cyclist) via a roundabout to the north, which was constructed as part of the Edenderry Business Campus. This distributor road has existing cyclist and pedestrian infrastructure on both sides of the main thoroughfare and extends for a short distance along the R441 until it reaches a pinch point at Monasteroris (See Figure 9.1).

<sup>6</sup><https://www.cso.ie/en/releasesandpublications/ep/p-cpr/censusofpopulation2022-preliminaryresults/geographicchanges/>

Specific infrastructure objectives which promote sustainable transport within Edenderry are included in Appendices A, B and C of the LTP contained within Appendix 2 of the Draft LAP. Of particular note is the planned widening of the R441 at Monasteroris and associated junction upgrades which will allow for improved/upgraded vehicular, pedestrian and cyclist connections from the subject land to nearby employment areas (EBC and Monasteroris Business Park), local schools and Edenderry Town Centre.

The existing cycle route to the north of the site, as identified in Appendix B of the LTP, connects to an ‘Indicative Inner/Outer Relief Route’ objective and includes an indicative/upgraded combined walking/cycle route. This objective identifies the Edenderry Inner Relief Road (Phase 1) which links Clonmullen to the R401 and was completed and opened in July 2022.

The Edenderry Inner Relief Road (Phase 2) is of particular note in the context of the subject lands, and is described in the LTP as follows:

**R01: Construction of Edenderry Inner Relief Road (Phase 2)**

*‘This road, cycleway and pedestrian link will connect Fr. McWey Street (at the rear of the Downshire development) westward to Edenderry Business Campus. This project will open up better access to the R441 via Edenderry Business Campus, and strengthen the cycling network through extension of an outer orbital cycling route. Design have been completed on this project and statutory permissions are in place.’*

Phase 2 of the Edenderry Inner Relief Road includes the construction of a link road from Fr. McWey Street (including Carraig Aoibhinn L-1028-1) to Edenderry Business Campus, Monasteroris (to the junction at R-441-1) and associated junction works. The proposed works include the construction of a single carriageway, footpaths, cycle paths, junctions, drainage, services, lighting and associated sundry/ancillary works. This new link road will provide an alternative route for local traffic and improve pedestrian and cycle connections to Edenderry Town Centre, particularly from Edenderry Business Campus. The construction of this link road is set to commence in Q2 2023 and is due for completion in 2024 (See Figures 9.1 and 9.2).

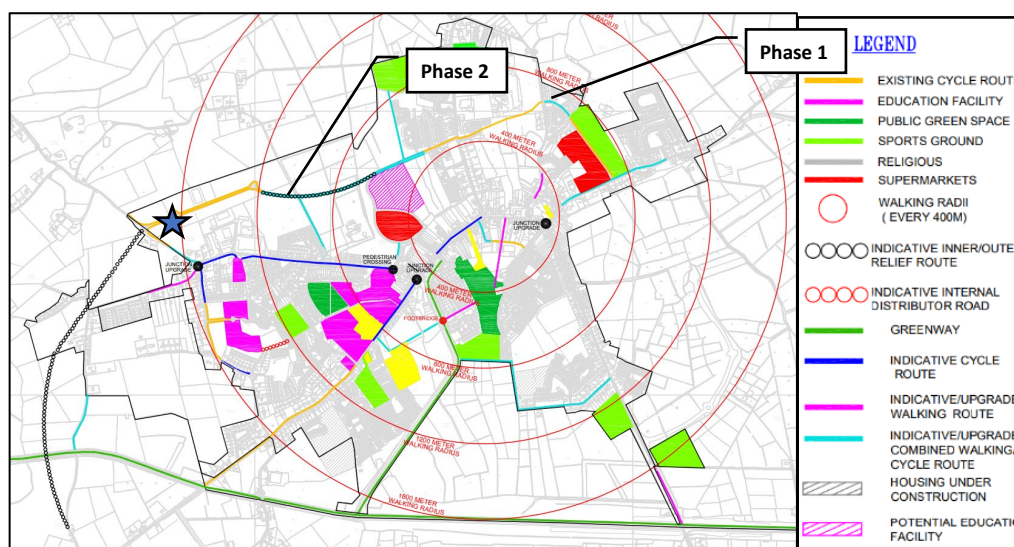
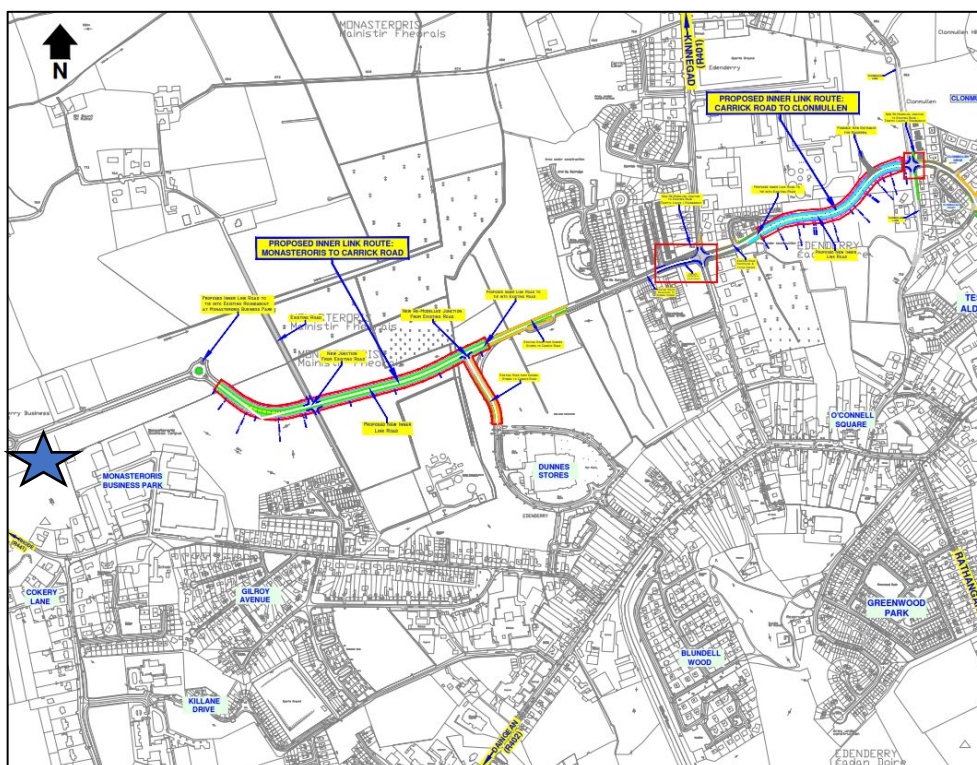


Figure 9.1: Extract from the ‘Proposed Infrastructure’ Drawing contained within the Draft LTP. The blue star indicates the location of the subject site (Source: Draft LAP, cropped and annotated by TPA, 2023.)



**Figure 9.2: Drawing of the Inner Link Roads: Monasteroris to Carrick Road & Carrick Road to Clonmullen. The blue star indicates the location of the subject site (Source: <https://www.offaly.ie>, cropped and annotated by TPA, 2023.)**

The completion of the Edenderry Inner Relief Road Project (Phase 1 and 2), in conjunction with the proposed road improvements and upgrades along the R441 and St Patrick’s Road, will inherently improve the road infrastructure within the vicinity of the subject site and its connectivity with the wider area, and particularly the town centre for cyclists and pedestrians.

### 9.3 Existing Water and Drainage Infrastructure

Based on information available on Offaly County Council’s website, Irish Water records and information from our client, there is existing infrastructure readily available within the vicinity of the site to support its future development (e.g. roads, public lighting water supply, drainage, foul, telecommunications etc.).

### 9.4 Supporting Employment:

The subject site is located to the west of Edenderry Business Campus which hosts a number of light industrial / warehousing businesses which are major employers within the town alongside Rosderra, a large meat processing company.

The lands have the benefit of being in close proximity to a mix of existing educational facilities, including Edenderry National School and Gaelscoil Éadan Doire, both of which are within walking/cycling distance of the site. In addition, lands to the rear of Dunnes Stores have been earmarked for a potential educational facility which will be directly accessible to the site via the Edenderry Inner Relief Road (Phase 2).





In terms of retail facilities, there is a number of large convenience supermarkets within Edenderry, namely Alia, Lidl, Tesco and Dunnes Stores. There are also several smaller retailers located centrally within Edenderry Shopping Centre.

### **9.5 Existing Site Conditions and Physical Suitability**

In terms of topography, the subject site is generally flat and contains a small amount of existing vegetation. No fluvial or pluvial flood risk areas are identified within or immediately adjacent to the subject site by the Office of Public Works.

The subject lands do not suffer from any physical limitations that may prevent their development for residential accommodation, subject to standard development management provisions.

### **9.6 Environmental and Heritage Considerations**

There are no existing site constraints have been identified on the lands regarding the conservation of environmental or heritage features. As noted previously, the subject site is not located within a Natural Heritage Area (NHA) or European Site (Natura 2000 site) as designated under the Habitats Directive (92/43/EEC), Birds Directive (2009/1477/EC) and the *Planning and Development Act 2000* (as amended). The closest European site is the Long Derries, Edenderry SAC, located c. 5.5 km to the south-east of the site.

No protected structures or monuments are recognised within the boundary or immediately adjacent to the subject site. Therefore, it can be inferred that the subject site is not of specific amenity, visual or environmental value, *per se*, that would mitigate against its development for residential purposes.

### **9.7 Compact Growth**

The site is within c. 1.5 km of Edenderry Town Centre and is contiguous to existing residential zoned lands/housing areas to the south and south-west, particularly along Corkery Lane, which includes the existing 'Manor' residential development comprising 40 No. semi-detached and detached houses. The open space lands adjoining the subject site to the south alongside the undeveloped lands north of the site have the potential to compliment and support any future residential development envisaged for the subject lands, as demonstrated by the accompanying Indicative Masterplan, prepared by OMP Architects. The zoning of the lands to residential would avoid the zoning of more remote lands for residential purposes further from the town centre.



## 10.0 CONCLUSION

We contend that it will be necessary to provide additional, suitably located, zoned lands to facilitate future planned growth within Edenderry given its designation as a 'Self-Sustaining Town' in the RSES.

In this context, we submit to the Planning Authority that additional lands are identified in the *Draft Edenderry Local Area Plan 2023-2029* for new residential development and that the proposed zoning of the subject site is amended from '**Enterprise and Employment**' to '**New Residential**' in the adopted *Edenderry Local Area Plan 2023-2029*.

The lands to the west of Edenderry Business Campus and within the settlement of Edenderry presents a key opportunity to deliver much needed residential development in the town. The land already benefits from having good access to existing employment and open space and will also benefit from planned road infrastructure improvements within the immediate vicinity.

Therefore, we ask the Council to take this opportunity to build on the existing planned vision for Offaly and to ensure that the full development potential of Edenderry can be realised over the plan period.

Should you require any further information concerning this Submission, please don't hesitate to contact the undersigned.

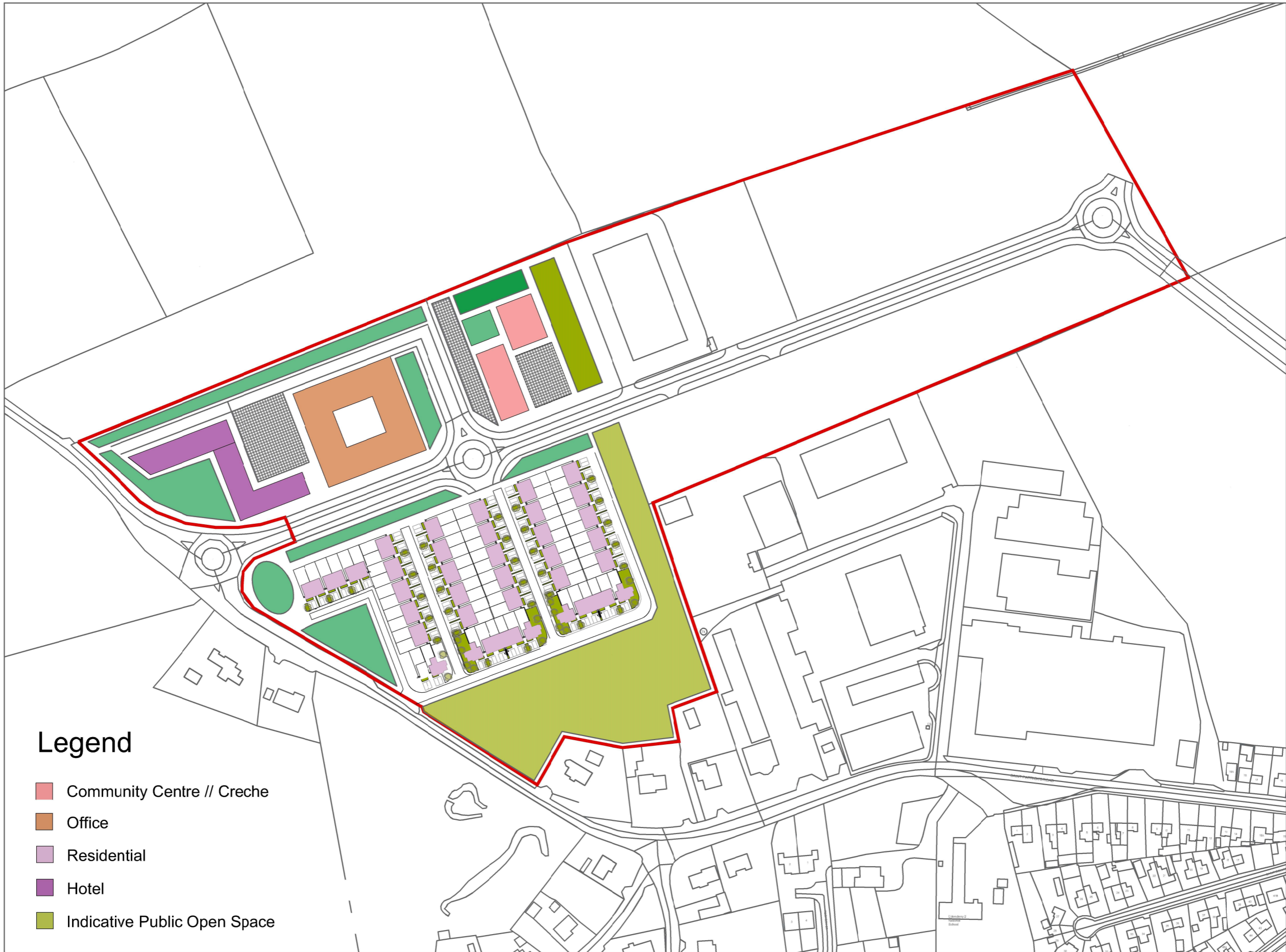
Yours faithfully,



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**John Gannon**  
**Director**  
**Tom Phillips + Associates**

## ***Appendix A***



### Legend

- Community Centre // Creche
- Office
- Residential
- Hotel
- Indicative Public Open Space