

Planning Department  
Offaly County Council  
Aras an Chontae  
Tullamore  
Co. Offaly

3<sup>rd</sup> February 2023

## **-: SUBMISSION ON EDENDERRY DRAFT LOCAL AREA PLAN :-**

Dear Sir / Madam,

**RE: DRAFT EDENDERRY LOCAL AREA PLAN 2023-2029**

### **1.0 INTRODUCTION**

On behalf of our client, Greypost Developments Ltd, Unit P21, Greenogue Business Park, Rathcoole, Co Dublin, we wish to make a submission on the Draft Edenderry Local Area 2023-2029. This submission relates to a vacant 'infill' site located in Carrickhall Estate in Edenderry.

The Carrickhall Estate was developed between 2004-2007 under permission Reg.Ref. 00/899. Prior to the lodgement of this planning application, the entire site was zoned for residential development. However, at the time of the initial development the portion of the site that is the subject of this submission was reserved for a future road connection to adjoining lands to the west. These lands were never used as public open space or recreation and amenity. This connection is now not required due to the construction of a new road to the north which provides access to these adjacent lands. This submission seeks the rezoning of this portion of land to facilitate better use of urban lands and to enable the developers improve the visual amenity of the streetscape, consolidate the development and in turn allow the area to be considered a 'complete estate'.

### **2.0 SITE LOCATION AND DESCRIPTION**

**Figure 1.1: Carrickhall Estate -Site Location in the context of the Town**



Source: Arcgis.com

The site is located approximately 300m north of Edenderry town centre off the R401. The site is adjacent to the town centre and is within walking or cycling distance of all local services and amenities. Carrickhall Estate contains a mix of house types ranging from terraced houses, detached and semi-detached houses. It features dedicated public open spaces centrally located with one large portion to the north of the access road and a second portion to the south of the access road.

**Figure 1.2 Close up of Carrickhall Estate**



Source: Arcgis.com (Approximate Site Area shown, - Actual Site Area = 2.77 ha)

### 3.0 PLANNING HISTORY

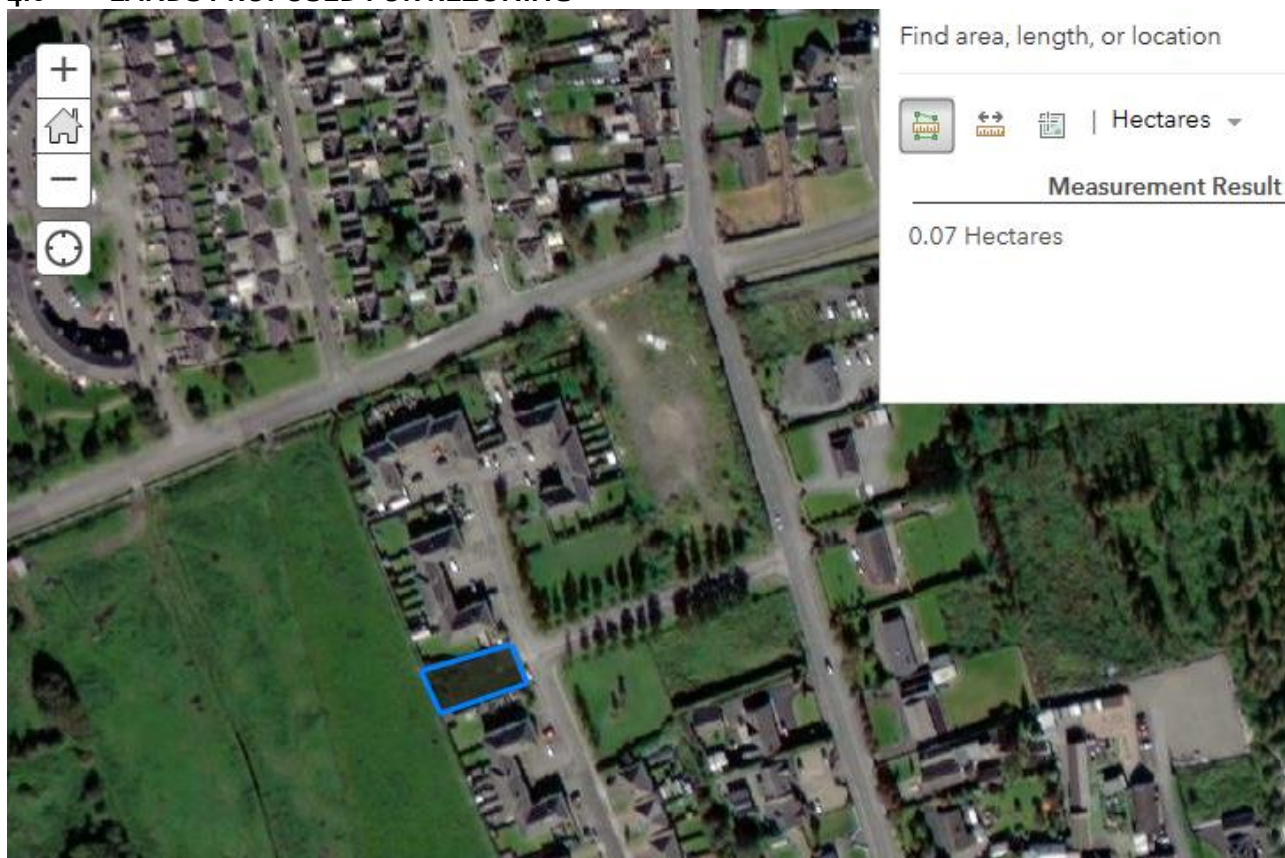
The details of the original planning permission for the development are listed below. 75 of these houses were constructed. The site of the 5 unconstructed houses was the subject of application Reg.Ref. 21/297 detailed below.

<b>Reg.Ref.</b>	<b>00/899</b>
<b>Applicant</b>	Carrickhall Developments
<b>Description</b>	80 no. dwelling houses
<b>Decision</b>	Granted 08/02/01
<b>Appealed</b>	Granted by ABP 04/07/01

<b>Reg.Ref.</b>	<b>PL2/21/297</b>
<b>Applicant</b>	Greypost Developments Ltd
<b>Description</b>	22 no. residential units, comprising of 18 no. two storey houses and 4 no. two storey apartments,
<b>Decision</b>	Granted 10/09/2021



#### 4.0 LANDS PROPOSED FOR REZONING



Source: Arcgis.com (Approximate Area shown)

#### 4.1 STREETVIEW OF LANDS PROPOSED FOR REZONING



Source: Chancery Group Construction Consultants

The lands are located at the centre of Carrickhall Estate directly opposite the T-junction formed by the entrance road. It can be seen from the street view above that the lands are in an unsightly and unkempt condition and are not functioning as public open space or amenity space.

## 5.0 PROPOSED ZONING MAP



-  Open Space, Amenity and Recreation
-  Industrial and Warehousing
-  Enterprise and Employment
-  Community Services/Facilities
-  Existing Residential
-  New Residential
-  Strategic Residential Reserve
-  Town Centre/Mixed Use

Source: Draft Edenderry Local Area Plan

It is evident from the above map that the portion of land that is the subject of this submission is zoned, 'open space, amenity and recreation'. However, it is evident from the photograph above in figure 4.1 that the space is not functioning as active open space. It has been used as a builders compound up until recently and that posts that support the boundary fence are still evident in the picture.

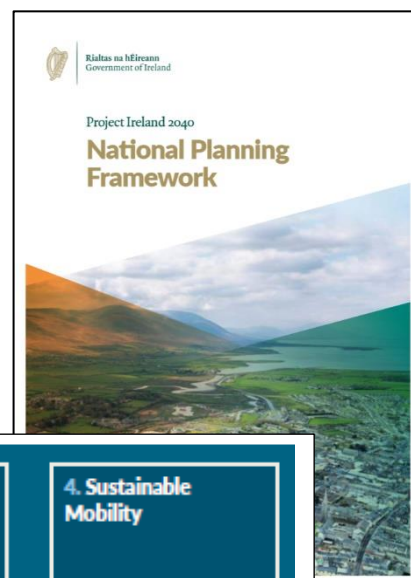


## 6.0 POLICY CONTEXT AND COMMENTARY

### 6.1 National Planning Policy Context - National Planning Framework

*Project Ireland 2040 – National Planning Framework* was published in February 2018. The *National Strategic Outcomes* are herein identified, and where a number of the outcomes are particularly relevant to the objectives of the subject application and to assist in delivering:

1. **Compact Growth,**
2. Strengthened Rural Economies and Communities,
3. Sustainable mobility,
4. A strong economy supported by enterprise innovation and skills, and
5. Transition to a low carbon and climate resilient society.



Under Section 1.3 Shared Goals – Our National Strategic Outcomes, states:

*This will depend on creating places that can foster enterprise and attract investment. It can be achieved by building regional economic drivers and by supporting opportunities to diversify and strengthen the rural economy to leverage the potential of places. Delivering this outcome **will require the co-ordination of growth** and place making with investment in world class infrastructure and in skills and talent to support economic competitiveness and enterprise growth.*

#### Comment

The above policy demonstrates a new direction in Town Planning where compact growth is supported in key settlements with a view to providing a sufficient density of population to support regional employment. Drawing from the National Planning Framework, Local Authorities are permitting the development of infill sites on the grounds that it represents the best and most efficient use of urban land within settlements identified in the Core Strategy and the Settlement strategy of the Offaly County Development Plan.

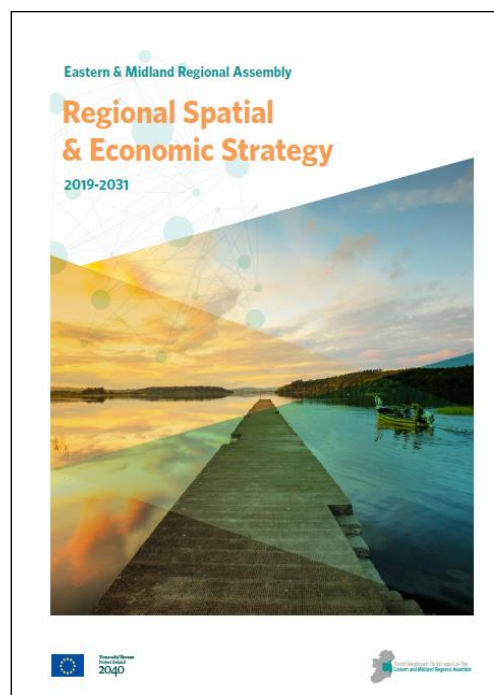
## 6.2 Regional Spatial & Economic Strategy (RSES) - Eastern Midland Regional Assembly (EMRA)

Edenderry is identified as a Self-Sustaining Town, falls within the Core Region of the EMRA where,

### **Placemaking**

*The ability to attract and retain talent is one of the key factors in building local sustainable competitive advantages for investment. Quality of life factors and placemaking are increasingly recognised as key to developing attractive places in which to invest, live, study, visit and work including access to amenities, facilities, arts, culture and heritage. This is **linked to 'Functionality' in terms of provision of suitable sites and property solutions to meet enterprise and labour force expectations.***

*Ireland is a highly open market economy that relies on enterprise development that is the formation of new business, known as start-ups and growth of **existing business known as scale-ups.** A diverse local sectoral mix is a strong determinant for entrepreneurship, and therefore economic growth.*



### **Sustainable competitive, inclusive and resilient Region**

*With immediate challenges emerging such as global issues and potential vulnerabilities within Ireland's enterprise base, the RSES adopts a threefold approach*

- *Firstly, sustaining what we have in the immediate term*
- *Secondly, **transforming our enterprise base for longer term resilience,** and*
- *Thirdly, **building on our strengths** to be successful in international trade while managing potential vulnerabilities.*

### **Comment**

The Regional Spatial and Economic Strategy follows on from the National Planning Framework in driving sustainable compact development to support regional jobs. The RSES also sets out ceilings in relation to population growth projections and the quantity of land zoned for new residential development. These figures are referred to below in the extract from the Offaly County Development Plan 2021-2027.

## 6.3 Local Policy Context –Offaly County Development Plan 2021-2027

The recently adopted Offaly County Development plan sets out the following planning policy for Edenderry:

### **1.3.4 Offaly County Development Plan 2021-2027**

*The Offaly County Development Plan 2021-2027 is a land use plan and overall strategy for the proper planning and sustainable development of the county over a 6 year period. The Plan is informed by Project Ireland 2040 and the Regional Spatial and Economic Strategy for the Eastern and Midland Region. Within the Core Strategy, Edenderry is listed as a 'Self-Sustaining Town', with the following function over the lifetime of the Plan;*

*The towns support the regional driver role of Tullamore, and act as important drivers providing a range of functions for their residential 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.**'*

*This LAP will work towards balancing the development of Edenderry through the support for 'catch-up' investments in social and physical infrastructure. This plan is working toward an anticipated population growth of 721 persons in line with the provisions of the Core Strategy objectives of the County Development Plan. Under the Core Strategy for the county contained in Chapter 2 of the County Development Plan, Edenderry is allocated a requirement for 10 ha for new residential development over the lifetime of the Plan. The 10 10ha of 'New Residential' zoned land has been identified within the existing built-up footprint of Edenderry. The development strategy of this plan is based around the projected population growth.*

#### **Comment**

The County Development Plan statement above in relation to Edenderry points to a need for consolidation to achieve its 'Self-Sustaining' category. The subject site is considered to be a 'town centre' site due to its location within 400m of the town centre. It therefore follows that allowing the infill development of the portion of land that is the subject of this submission, in a high density format, would contribute to the achievement of consolidation in this area. The piece of land in question is relatively small at 0.07 ha and is more centrally located than the majority of the lands/sites proposed to be zoned 'new residential' in the draft LAP. It is therefore submitted that it makes sense, on a sequential basis to zone this portion of land for residential development.

#### **6.4 DRAFT EDENDERRY LAP 2023-2029**

It is submitted that the planning policies set out in the Draft LAP support the request for rezoning in this submission both at a strategic – job creation and maximising population in the town centre and local – quality placemaking and improved visual amenity viewpoints. It states:

*This LAP is underpinned by the strategic vision statement: to guide the future growth of Edenderry in a sustainable manner, in a way that reflects the inherent character of the area and identifies the **potential of utilising its existing assets as the base for improving** the quality of life and resilience of both the present and future residents of the town.*

*The following strategic aims in conjunction with each other will assist in delivering the strategic vision for Edenderry.*

##### **Strategic Aim 1: Economic Development**

*To successfully fulfil Edenderry's role as a self-sustaining town by embracing the transition to a low carbon and climate resilient model of development while seeking to **utilise and invest in the town's existing economic, social and environmental assets to generate sustainable economic development and job creation**, thereby enhancing its status as the main business, service, employment, social, cultural, tourism and recreational hub for everyone in east Offaly and ensuring it is an attractive place to live, work and visit.*

#### **Strategic Aim 4: Residential**

*Deliver high quality housing in terms of design, scale, mix, tenure, **sequence and density** to reasonable match the requirements of the different categories of households which shall be constructed on the principles of universal design, life-long adaptability and energy efficiency, and developed in a manner **which promotes compact growth and healthy place-making** and is in line with the Core Strategy in the County Development Plan.*

#### **5.2 Compliance with the Core Strategy**

*Based on the Core Strategy for the county contained in the County Development Plan 2021-2027, 10 hectares of lands are required to be zoned for 'New Residential' to assist in sustaining the anticipated population growth and housing supply target for Edenderry, which is 323 residential units with a population growth of 721 persons above the 2016 Census population of 7,359. Monitoring the number of units permitted and constructed enables alignment with necessary physical, social and community infrastructure.*

#### **5.3 Achieving Compact Growth**

*Securing compact and sustainable growth is a **key aim** of the Council - this means favouring more compact forms of development that focus on reusing 'brownfield' land, **building up infill sites** and reusing or redeveloping existing sites and buildings **within Edenderry Town**. The compact growth strategy as outlined in the NPF emphasises locating new development and investment in areas with existing physical and services infrastructure. Edenderry is well placed to support new development that **will consolidate its footprint and contribute to the viability of services, shops and public transport**. Provision of the targeted housing supply within the built-up footprint of Edenderry will enable people to be closer to employment, recreational and sustainable transport opportunities.*

*As per the TCF Policy, the Council recognises the **importance of having vibrant, accessible and lived-in town centres** that are home to young and old, which are not seen as a second-best option to more peripheral locations. **The vision for Edenderry** is that growth planned for the town over the life of the Plan **occurs in a sustainable and sequential manner, characterised by a compact, consolidated and permeable pattern of development** linked by sustainable modes of transport including a robust network of pedestrian and cycle routes. **The Council will encourage** the appropriate redevelopment of brownfield and **infill sites for residential** and mixed uses within the existing built-up footprint of Edenderry Town in addition to **making better use of under-utilised land** and buildings including vacant, derelict and under-occupied buildings.*

#### **5.8 Residential Policies**

*It is Council policy to:*

**RP-01** *Encourage **the compact growth** of Edenderry Town and undertake a town centre first approach to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the County Core Strategy Table.*

**RP-02** *Remain within the allocated housing requirements set out in the County Core Strategy for Edenderry when facilitating residential development. In this regard, development shall not be permitted where it conflicts with the County Core Strategy.*



***RP-03 Encourage the appropriate redevelopment of brownfield and infill sites for residential and mixed uses within the existing built-up footprint of Edenderry Town.***

### **5.9 Residential Objectives**

*It is an objective of the Council to:*

***RO-01 In line with the requirements of the National Planning Framework, ensure that at least 30% of all new housing development is delivered within the existing built-up footprint of Edenderry Town.***

**(bold font -our emphasis)**

#### **Comment**

The above statements, policies and objectives set out in the Draft Edenderry LAP all point to the need for consolidation, infill development and compact growth. As stated in the commentary on the County Development Plan, it makes sense, on a sequential basis to zone this portion of land for residential development in order to achieve the objectives of town centre consolidation and compact growth. This in turn would contribute to the viability of services, shops and public transport and enable people to be closer to employment.

## **7.0 JUSTIFICATION FOR REZONING PROPOSAL**

Prior to the lodgement of planning application Reg.Ref. 00/899, the entire site was zoned 'residential' including the portion of lands that is the subject of this submission.

The subject lands were previously reserved for a link road, to access backlands to the west. This road is no longer required due to the construction of a new road to the north which can facilitate access to these backlands.

The permitted housing estate does not rely on this portion of land for public amenity purposes. This land does not function as public amenity space and it never has. It was formerly a builders compound and is now in an unsightly unkempt condition and has a negative visual impact on the wider housing estate.

It is estimated that the subject site has the capacity to accommodate at least 4 no. dwelling units in a high density form that would integrate with the existing structures to the north and south of the site.

The development of the subject lands would accord with National, Regional and Local Planning policy discussed above which inter alia promotes:

- Consolidation of Edenderry Town Centre/existing built footprint
- Compact Growth
- Sequential Development
- High Density infill development
- Consolidation of development to promote provision of services and employment

The subject lands are located within walking distance of the town centre and cycling distance of the wider town services and facilities.

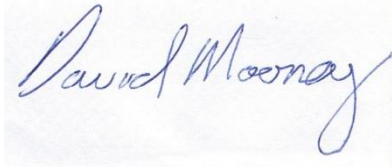
The development of the subject land would improve the visual amenity of the Carrickhall Estate and allow it to be considered a 'completed' estate.

## 8.o CONCLUSION

We submit that we have put forward a viable justification for the rezoning of the lands that are the subject of this submission from '*open space, recreation and amenity*' to '*new residential*'. We respectfully submit that the development of these lands for residential purposes is in accordance with planning policy at national, regional and local level and would lead to an improvement in the visual amenity for surrounding residents.

We look forward to your full consideration of this submission as part of the Draft Local Area Plan process.

Yours faithfully,

A handwritten signature in blue ink that reads "David Mooney". The signature is written in a cursive, flowing style.

**David Mooney MURP MIPI**  
**Senior Planning Consultant**  
**The Planning Partnership**