

CUNNANE STRATTON REYNOLDS

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Review of County Development Plan,
Forward Planning Department,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore,
Co. Offaly.

25th September 2019

By Email: www.offaly.ie/cdp2021-2027.

Re: Review of County Development Plan

Submission on behalf of Olympia Investments Ltd on the Offaly County Development Plan Issues Paper

Dear Sir/Madam,

Cunnane Stratton Reynolds has been appointed by Olympia Investments Ltd to make this submission on the Offaly County Development Plan Public Consultation Issues Paper as part of the ongoing Review of the current County Development Plan.

Introduction

Our client has a site comprising William Street Bar and Eatery Columcille Street and also 61 Columcille Street both located within the defined centre of Tullamore and which is covered by the Tullamore Town and Environs Development Plan which has been extended until 2020. The extension of that Development Plan until next year means in our opinion that any new town and environs plan covering our client's site will have to accord with the provisions of the emerging County Plan – the first stage of which is marked by the placing of the Issues Paper on public display and the invitation to comment.

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We are aware that, at this stage, the emerging County Plan considers primarily ‘big picture’ issues and not rezoning. Our client’s site is zoned as Town Centre in the Town and Environs Plan and our client’s intention is to have that zoning retained and if possible the development potential of that site maximised in accordance with relatively recent national and regional planning advice, with which the emerging County Development Plan must be in accordance with.

Background

The request through the Issues Paper is to identify the main planning issues facing the County. We believe that one of the main issues is to ensure that the potential of Tullamore is realised and that the proper planning and sustainable development of the County Town is achieved. The National Planning Framework (NPF) identifies that 30% of all new homes should be proposed within existing built up footprints. If such a quantum of development is proposed for existing centres then it is critical that Tullamore receives a significant proportion of that new housing. If that is to be the case then it is essential that the town centre is robust and accessible and capable of accommodating a large amount of supporting commercial, leisure, and retail activities to ensure that such a location is an attractive and sustainable location to live, work and visit. Section 3.2 (Eastern and Midland Region) identifies that there will be a requirement to accommodate an additional half a million more people than exists in the region today. It is identified that there will be a greater requirement for a range of supporting land uses to residential with a strengthening of urban cores of the county towns (page 33 refers) including Tullamore. This means that there is an added emphasis on self-sustaining economic and employment based development opportunities to match and catch up on rapid phases of housing delivery in recent years (page 35 refers).

Recent ministerial guidance in the form of the ‘*Guidelines on Urban Development and Building Heights for Local Authorities*’ has further expanded on the key principles of the NPF. These guidelines indicate that in formulating development plan policy and objectives, and in determining planning applications, local authorities should seek to maximise the development potential of sites, particularly those in town centre, brownfield sites, that are serviced and accessible by public transport. These indicate that building heights and densities should be determined with regard to heritage and environmental considerations and in the absence of height or density prescriptive standards in statutory development plans.

Since the previous County Plan was approved the NPF has been adopted along with the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region. Our client

supports the inclusion of Tullamore as a defined 'Key Town' that has a capacity to act as a growth driver to complement the Regional Growth Centres.

Page 89 of the RSES identifies that the town offers significant quality of life advantages. The overall objective stated on page 89 is that there should be continued employment and population growth coupled with placemaking and regeneration as key priorities. The potential for further employment is identified in Regional Policy Objective RPO 4.69. The need for an upgrade to the wastewater network is also identified as being required and this should be prioritised within the emerging County Plan.

The 'Potential Opportunity Sites' in Tullamore Town Centre, shown in Fig 7.3 of the adopted Town and Environs Plan, within which our client's site is located are critical to creating an integrated planning approach to high density urban revitalisation through employment, shopping, residential opportunities, transport links, environmental enhancement and improved access. These sites will be the focus of future sustainable and integrated development that will maintain and elevate the status of this county town. Maximising the development potential of the town centre through the sustainable development of the opportunity sites will greatly reduce urban sprawl and the need to develop in less sustainable locations at the periphery of the town.

Our more detailed comments are set out under the issues and questions posed in the Issues Paper.

Overall Vision

The following questions are posed:

What kind of County would you like to see Offaly become by 2027 and what could the County Development Plan target specifically to help achieve that vision?

What vision statement would you like for County Offaly in the County Development Plan?

What kind of County would you like to see Offaly become by 2027 and what could the County Development Plan target specifically to help achieve that vision?

County Offaly should have a strong county town with a vital and vibrant town centre further enhancing Tullamore as a place to live, work and visit. There should also be potential to coordinate the development of key sites with reference to key design parameters and to this end a masterplan should be provided, where this is possible, given disparate and potentially non converging development interests. We would advocate that if a masterplan is required that this be organised and coordinated by the County Council with 'buy in' from landowners or that

an abbreviated design guide be produced that would facilitate developers developing at their own pace and on their own, if necessary, but with regard to overarching principles that all developments must comply with.

What vision statement would you like for County Offaly in the County Development Plan?

We anticipate a vision statement that is core strategy and town centre based, with town centre of the County Town be given precedence, but not exclusivity, in such a vision.

Towns, Villages and Regeneration

The following are the key questions posed in the Issues Paper.

How do you suggest we make our towns and villages more compact and avoid undesirable and inefficient sprawl, as required by the NPF?

How do you suggest we target a significant proportion of future development on unused / underutilised sites within the existing built-up area of towns and villages as required by the NPF?

How can we deliver new development in a way that better aligns the location of population growth and employment growth, allowing towns to become more self-sustaining and balanced rather than based on commuter driven activity?

How do you suggest we develop Tullamore a Key Town, in order to fulfil its role as a key growth driver of the county and Midlands region?

How do you suggest we reverse the decline / stagnation of towns and villages and regenerate them by creating attractive, vibrant, viable, liveable places of high quality design?

What areas are underused and in need of regeneration?

How can we make our town centres more attractive to live, work and shop in?

Our response is as follows:

How do you suggest we make our towns and villages more compact and avoid undesirable and inefficient sprawl, as required by the NPF?

This author's view is that the guidelines on urban development and height should be followed to the maximum. The guidelines develop or expand upon the concepts and overarching objectives of national policy and the 'new' County Plan and subsequently the 'new' Tullamore and Environs Plan should reflect these more recent guidelines. We would also advocate, entirely as per these guidelines, the relaxation of development control or development management standards contained in the previous County Plan. A high quality and sustainable development of town centre sites can still be achieved without slavish adherence to standards.

How do you suggest we target a significant proportion of future development on unused / underutilised sites within the existing built-up area of towns and villages as required by the NPF?

Some relaxation of standards should be encouraged on town centre sites as indicated above. In a sense it should be the case that it is easier to develop in town centre sites than in less sustainable locations. Maximisation of the development potential of the opportunity sites can greatly enhance the viability of public transport, local services and generally enhance the regional role of this designated Key Town and facilitate interaction and synergy between the various opportunity sites, with each site occupying niche and complementary development. The development of these opportunity sites will also present opportunities for environmental and public realm enhancements between these opportunity sites.

How can we deliver new development in a way that better aligns the location of population growth and employment growth, allowing towns to become more self-sustaining and balanced rather than based on commuter driven activity?

The town centre of Tullamore has a unique role to play in making Tullamore a sustainable settlement and to providing greater balance between jobs and residential units. The town centre should be encouraged as a location for town centre, modern living, in higher density, taller buildings providing a greater range of housing choice for those already working in the town and for Foreign Direct Investment that may be looking to provide vital and vibrant town centre living with all modern services, amenities and conveniences at their doorstep.

The development of the opportunity sites would take advantage of and further likely enhance the strategic and regional road network serving the town as well as ensuring the viability of further upgrade.

How do you suggest we develop Tullamore a Key Town, in order to fulfil its role as a key growth driver of the county and Midlands region?

As indicated above, adherence to principles, policies and objectives contained within the emerging County Plan and subsequent town plan that are consistent with the national and regional planning policies and guidelines above would greatly assist Tullamore fulfilling the role identified for it as a Key Town.

How do you suggest we reverse the decline / stagnation of towns and villages and regenerate them by creating attractive, vibrant, viable, liveable places of high quality design?

Our principle suggestion is to apply the relevant and necessary developments standards as flexibly as possible, and where appropriate, dispense with (overly restrictive) standards, consistent with the recent Guidelines on Urban Development and Height.

What areas are underused and in need of regeneration?

Our client supports the inclusion of their premises identified above within an opportunity site, effectively a regeneration area. We suggest that the emphasis on the production of a masterplan for this part of the site be reconsidered, if the County Council are in a position to provide appropriately detailed design standards as they state in the current town development plan. It may be impractical to have various developers work together and an alternative to this mechanism for ensuring integration of development should be presented within the county and town plans.

How can we make our town centres more attractive to live, work and shop in?

Please see our response above. Additionally, we suggest that the widest range of land uses be encouraged and that accessibility to town centre sites be maximised.

The Council also ask how the upper floors in the town centre can be encouraged to accommodate residential living. We suggest that each building block or plot accommodate mixed use from ground to upper floors.

We trust the above will be considered by you in the formulation of the new County Plan.

We await acknowledgement of safe receipt.

Yours sincerely,



CUNNANE STRATTON REYNOLDS

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