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County Offaly Development Plan 2021 - 2027

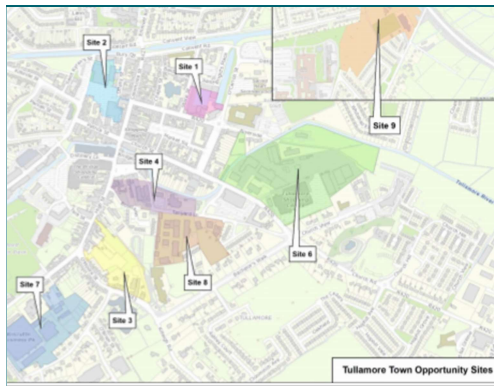
Draft Plan : Submission on behalf of Flanagan Properties Ltd, Kilcruttin, Cormac Street,
Tullamore

Objection to draft Plan in regard to its land at The Tanyard, Tullamore

Proposed Amendment : Delete Core Retail Area and Provide a Town Centre Boundary, incorporating Central Opportunity Sites

Introduction

1. This representation is submitted on behalf of Flanagan Properties, which is the landowner of the land known as The Tanyard, Tanyard Lane, Tullamore, shown as Opportunity Site 8 below.



Source : CODP 2021 DRAFT – Opportunity Site 8

2. Flanagan Properties welcomes the opportunity of participating in this plan-making process and requests that OCC gives full consideration to this representation, which objects to Core Retail Area as defined in the draft Plan and the lack of a clear town centre boundary.
3. It also considers that policies and objectives regarding the process for consideration of development at Opportunity Sites should be amended to ensure the sites are viable and can be delivered within the plan period. Flanagan Properties is aware of and supports other submissions made to the Plan by Grapemont Ltd, Weavermy Ltd and the Tullamore & District Chamber of Commerce.

Background

4. The Tanyard is a viable town centre business, occupied by various small scale businesses in a variety of town centre uses. There are some 26 businesses, employing approximately 90 people in the location. Despite the current economic situation, the estate is occupied and units are rarely vacant to any significant period if a business relocates.
5. Many units are in retail uses and contribute to the vitality and viability of the town centre. Flanagan Properties is aware that Tanyard Lane provides a good link between to the main shopping areas of the town centre – that centred around Columcille Street and that at Church Street.

The Objection – Justification

Core Retail Area – Delete the draft defined core retail area in Tullamore Town Centre

6. Flanagan Properties considers the Core Retail Area is incorrectly drawn on the proposed Town Map. It is based on only part of the existing town centre as it omits the retail area in the vicinity of Church Road / Church Street.
7. The limited Core Retail Area, and the policies / objectives which seek to direct development only to that area in the first instance harm the potential for Tullamore to act as the top tier in the retail hierarchy and restrict opportunities for retail-led town centre development. In its narrow definition, the Core Retail Area portrays only part of the current retail areas of the town centre and provides limited opportunity for the town to grow, as required by national and regional policy.
8. The inconsistency in the draft Plan introduces uncertainty, thereby being a constraint to development. Page 209 states : *The core retail area of each settlement area has been delineated to identify clearly that part of a town centre which is primarily devoted to shopping as distinct from the wider town or village centre / mixed use zoning objective* which indicates that the Core Retail Area as defined in the draft Plan as the land centres around Columcille Street; that ignores the existing retail area at Church Street, which has a significant vitality and health. As both areas are primarily in town centre retail use, both are strong retailing areas and both are within the town centre, it is considered that the draft Plan is flawed in only recognising one part.
9. Policy RTCP-07 then states : *It is Council policy to encourage retail development primarily in core retail areas and to apply the sequential approach in the consideration of the location of retail developments located outside of core retail areas* . This conflicts with Policy RTCP-02 which states : *'It is Council policy to promote Tullamore, a Key Town, as the main retail centre in the county and to ensure that the retail quantity, quality and range is of a standard that contributes to the strengthening of the retail economy within Tullamore Town, the county and the region as a whole.*
10. On this basis, it is considered that the Core Retail Area should be deleted, and development focused to the Opportunity Sites identified in Tullamore as the primary location for development, recognising the significant contribution Tanyard Lane plays in linking between the two main shopping areas of the town centre.

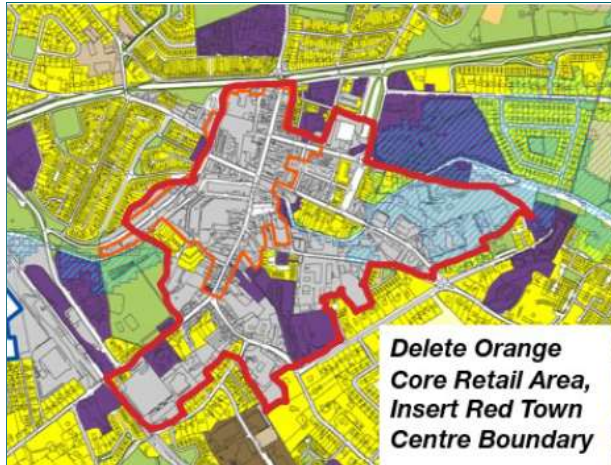
Omission of Town Centre Boundary – Designate around the central Opportunity Sites

11. In association with the above, the town centre for Tullamore is ill-defined. This makes the reading and interpretation of the document difficult and does not allow for proper consideration of those site which constitute town centre (and acceptable for retail-led developments) compared to edge of centre (i.e. normally 'adjacent to the boundary of the central area 300-400m'). The inclusion of a clearly defined town centre boundary, which incorporates most of the Opportunity Sites identified in the draft Plan, would provide clear guidance regarding the potential for retail-led development, would lead to certainty and

¹ <https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload.30026.en.pdf>

would more likely lead to delivery of the intentions of the plan to achieve a strong town centre and one which reduces retail-spend from the County.

Draft Tullamore Town Plan – *Proposed Amendment*



Policies and Objectives Constrain Development – Amend to Encourage development

12. Opportunity sites do not necessarily follow coherent boundaries, yet the draft Plan requires a coherent approach to their development. Flanagan Properties has no objection to the requirement to ensure that development of one part does not frustrate the development of another but considers it an inappropriate constraint to require all parts to be brought forward at one time. This unnecessarily constrains sites in the urban footprint and particularly those previously developed or in multiple landownerships. This is proved by the fact that only one opportunity site has actually been partially built out over the past 15 years.
13. This is addressed in more detail in the submission made by Weavermay Ltd, which is supported by Flanagan Properties.

Conclusion

14. Flanagan Properties welcomes the opportunity to participate in this plan making process and requests that its comments are taken into consideration.
15. In particular, the following changes are requested :
 - Delete core retail boundary and reintroduce town centre boundary and indicate important town centre linkages– recognising the importance of the town centre as a whole to the:
 - growth and improvement of retailing within the county



- the vitality and viability of Tullamore town centre as the top of the retail hierarchy in Offaly
- enhancing the potential for the development of the opportunity site
- Remove the requirement regarding comprehensive redevelopment of the Opportunity site, allowing each component part to be delivered in a viable manner providing it does not prevent redevelopment of the remaining land.