

## Tullamore & District Chamber of Commerce

### Submission to Offaly County Development Plan 2021-2027

#### Second Stage Public Consultation – September 2020

#### Introduction

To summarise the position of Tullamore & District Chamber from our previous submission:

*“Project Ireland 2040 and the Eastern and Midland Regional Spatial Strategy espouse compact, smart urban growth, to enable the enhanced and effective provision of a range of accessible services, pursuant to the objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy.*

*It is the opinion of Tullamore & District Chamber of Commerce that the twin goals of transition to a low carbon economy and centralisation of services are necessary, yet apparently in conflict with the sustainability of rural economies and more importantly, communities. Perhaps this assertion is cast in no starker relief nationally than in North and West Offaly.*

*It is in this context that Tullamore & District Chamber of Commerce is unashamedly in favour of the prioritisation of Tullamore as a “Key Growth Settlement” and economic engine for the entire County and region.”*

On behalf of the Chamber, we reiterate our commitment to the above principles and offer this submission based on same.

We acknowledge there is some recognition and planning for the primacy of Tullamore as the key future economic driver of County Offaly, with the increased zoning to the north of the town for industrial development. We note that IDA have procured additional lands in Athlone and Mullingar for expansion of existing facilities and question is the plan for these lands in Tullamore similarly in IDA's plans to develop. Given the size of the areas zoned, we question is Offaly County Council's intention to procure the lands to consolidate ownership insofar as it is possible to do so short of issuing CPOs. We also question whether Irish Water have sufficient infrastructure in place to service and major industrial investment which could fill those lands and provide for a working population of 500-600. Zoning lands is a positive step, but to see investment there, a proactive approach, availability of infrastructure and financial incentives back by public money are going to be required.

We are dismayed about the narrowing of the border around the town's retail core and will not accept this. The proposed border only encompasses one of nine opportunity sites identified in the plan, which makes no sense. Further, it does not take account retail development that have already happened outside of the core, such as the new Lidl on Church Street and the Retail Park in Cloncollig. It does not consider the planning permission already granted at Coens' Yard (Site 6, Figure 7.4). It does not take into account the current dynamism in retail trends, including but not restricted to the COVID-19 accelerated shift to online retail and the resultant requirement for lower cost warehouse-type accommodation which facilitates a hybrid between bricks-and-mortar retail and online distribution. It does not acknowledge the fact that many of the properties in the town core are listed, making adaptation to modern retail requirements difficult, and are probably more commercially viable for conversion back to residential, which in itself is highly consistent with Ireland 2040 and the EMRA RSES settlement strategy.

We are extremely concerned that the proposed housing and settlement strategy aspect of the current draft will place unnecessary limitations on Tullamore's ability to fulfil its function as a Key Growth Settlement. We note extensive lands to the south of the canal, previously zoned residential, have now been reclassified as "Strategic Residential Reserve". De-zoning by any other name is still de-zoning! Tullamore & District Chamber were at pains to make clear in submissions to the Ireland 2040 and EMRA RSES documents that the principal reason Tullamore as a Gateway town did not meet its prescribed population growth targets under the National Development Plan was a collapse in capital markets and deep recession. We feel the context of this failure has led to a complete collapse in ambition from the authors of the OCDP 2021-2027 and wish to point out that many factors this time around provide a strong tailwind potential for population growth in Tullamore. Firstly, COVID-19 has accelerated a shift to remote working. This means people will be less inclined to live in expensive cramped accommodation in Dublin just to be close to work, and places like Tullamore with its strong lifestyle credentials can appear more attractive to working professionals who can work remotely. Secondly, the scenario regarding capital has flipped 180 degrees since the last recession; the ECB are willing to finance state-backed projects which are ambitious and consistent with planning policy. There is a major opportunity for Offaly County Council to push Irish Water hard on providing adequate water supply to areas of the town which need to be developed. We remind Offaly County Council that Tullamore has uniquely strong wastewater treatment capacity, enough to support an urban population of 30,000. Millions of euro worth of taxpayers' money was spent to provide this infrastructure and if the town does not grow to at least approach this capacity, it will have been an egregious waste of public funds. The vast majority of lands proposed to be zoned for residential are north of the canal. Only three of eleven schools are located north of the canal. The prioritisation of settlement to the north makes no sense in this context and we strongly urge Offaly County Council to engage with the forward planning unit of the Department of Education in this regard. The only logical explanation for this is the relative availability and affordability of providing additional water supply to the north of the town, but Irish Water cannot become a de-facto planning authority and Offaly County Council ought to pay far more heed to the goals of Ireland 2040 and the EMRA RSES document which envisions a scenario where the majority of urban dwelling children can walk or cycle safely to school within 10-15 minutes of their home. In this context, undeveloped land tracts to the south of the town are far more suitable, with closer access to the majority of the schools in the town, and where Offaly County Council have far greater potential to provide safe, planned greenway permeability tracks linking the schools with future residential developments. Planned in conjunction with Irish Water, this is a perfectly financeable project using European and State funds. Ireland 2040 espouses the virtues of such collaborative projects between state agencies and crucially, states that it is the most ambitious and innovative plans which will be financed and that no growth limitations will be placed on towns where the local authority brings forward viable plans such as this.

## Manifesto

Ahead of the General Election, Tullamore Chamber released a manifesto to all Dáil candidates in the Laois/Offaly constituency, highlighting our priorities for the town and region. It read as follows.

- 1. Develop double rail track from Portarlinton / Tullamore with commuter time schedules to / from Tullamore same as Portarlinton.**
  - Chapter 8 states Offaly County Council will co-operate with Iarnród Éireann pursuant to the twin goals of double tracking from Portarlinton to Athlone (2020-2025) and the Electrification of the Dublin to Galway line (2025-2030) in accordance with the 2030 Rail Network Strategy Review (2011), but we also note the lack of tangible progress in this regard.
  - The provisions in the draft regarding rail travel seem rather aspirational and not in the gift of Offaly County Council or any other state body to implement under the auspices of a plan. Citing hypothetical future links from Mullingar to Clara and Enfield to Edenderry just seems fanciful at this point.
  - The plan should be more specific about projects related to rail travel that fall within the remit of Offaly County Council to deliver. For example, appropriately zoning lands adjacent to Tullamore Train Station and seeking finance to plan and develop a transport and high density residential node there, in conjunction with Iarnród Éireann and Bus Éireann, would be consistent with government policy and financeable.
- 2. Progress delivery of the extension of the M6 to Tullamore, plus improve North / South and inter regional connectivity by delivering dual carriageway Tullamore / Portlaoise N80.**
  - We note the provision for this in Chapter 8, but take the opportunity to highlight the urgency of both projects in the context of the role of Midland Regional Hospital Tullamore as a designated trauma centre.
- 3. Almost there! but needs one last effort! Support Midland Regional Hospital Tullamore in its pursuit to gain University Status.**
  - COVID-19 will have had the potential to shift the focus of the HSE away from MRH Tullamore's transition to University status. This is less of a priority for the HSE than it is for Tullamore and it needs an extra push from Offaly County Council to get this over the line.
- 4. Identify and develop a new 100 plus acre IDA industrial site.**
  - We note the provision of extra zoning for industrial development to the north of the town. This is to be welcomed, but action is needed to ensure employment can be facilitated on these lands in a timeframe that is useful to the ex Bord na Móna employees of west and north Offaly.
  - It is extremely important that ownership of these lands is consolidated insofar as it is possible. We would like to see Offaly County Council and/or the IDA procuring these lands in order to minimise the potential for private landowners to scupper planning applications and future developments.
  - We would like to see more tangible detail as to how and by whom these lands will be developed and serviced with the requisite utilities such that they can stand a realistic chance of attracting occupants within a reasonable timeframe.
  - The pocket of land to the extreme north east of the plan, should be zoned industrial only. It is an ideal location but currently zoning is split between residential and industrial. There would have to be an off-set boundary between any future residential and industrial development on that plot which severely curtails the amount of usable land on the plot for industrial purposes and therefore makes the plot unsuitable for development.

**5. Develop dedicated cycling tracks around the entire town linking all schools.**

- We note the extensive emphasis on the development and provision of greenways and blueways, but would like to see more emphasis and detail on the linking of schools and future residential developments

**6. Improve connectivity within the town eg open the Library bridge and walkway from Market Sq to O'Connor Sq. and Tanyard to High St.**

- We acknowledge this level of detail falls under the remit of the town and environs plan for Tullamore which will follow the County Development Plan but also point to the fact that we requested an accessibility and permeability plan for Tullamore in our previous submission. This can be progressing separate to the County Development Plan drafting process.

**7. Progress redevelopment of the harbour. Relevant Government agencies all agree this unique piece of Midland infrastructure needs to be opened up to the public. Let's make this happen.**

- We acknowledge the provision of the Harbour as Opportunity site #1 and the progress made in re-locating the Waterways Ireland depot. We would like to see more tangible progress on the ultimate plan for the Harbour and in the shorter term, we would like to see the boundary walls taken down to provide public safe access to the harbour amenity until such time as construction starts.

**8. Carry out a detailed survey of commuter traffic leaving the town daily via trains, buses and private transport. IDA needs this information for potential FDI investment to the town.**

- In addition to this, any housing strategy must take account of the effect Covid-19 has had on commuting patterns and its accelerating of the trend towards remote working. Early indicators suggest a shift in interest towards accommodation conducive to remote working, i.e. space for home office, access to services, good quality broadband, childcare, education, amenities and transport links. This puts Tullamore in its best competitive position in decades to attract well paid professionals to live in and around the town.

## **Addressing Points Made in Previous Submission**

### **1. Towns & Villages Regeneration and Housing**

In our previous submission to the issues paper we said that very little happened by way of large scale urban regeneration within Tullamore before, or since, the urban renewal scheme of the 1990s which provided for double rent allowance and 10-year rates waivers. Therefore, it is clear that in the absence of a similar scheme, public funds and planning are going to have to do a lot of the heavy lifting. This should not be a major obstacle given the completely altered environment in terms of the low cost finance and grants that have been made available for such projects by the ECB.

We also said that Offaly County Council needs to be more proactive and ambitious in collaborating with other public bodies and private developers to actively pursue the public funding available for development of opportunity sites, brownfield and infill sites to provide compact growth, re-population of the town centre and development with good access to existing services. Earlier in this document, we have specifically mentioned projects which would require Offaly County Council to collaborate proactively with Irish Water, HSE, IDA, Iarnród Éireann and Bus Éireann.

We said that the re-purposing of listed buildings needs to be made more attractive and user friendly as a commercial undertaking.

We encourage Offaly County Council to re-read these paragraphs from our previous submission and take them into account and do more in future to action them, as they are entirely consistent with national and regional policy.

Finally, we requested inclusion for consolidated digital signage on the approach roads to the town and for a unique iconic monuments or “selfie-locations” in and around the urban realm to assist with organic user-generated promotion of the town on social media.

### **2. Economic Development**

As above, we welcome the provision for zoned industrial lands to the north of the town with potential for development as a future industrial estate or large-scale single-use occupancy. We would like to see more detail regarding who will develop these lands with a view to attracting job-creating inward investment, and how this will be financed. We suggest there needs to be public money made available to make this commercially attractive. We point to the urgency of this development in light of the transition of Bord na Móna to low carbon enterprise, and the resulting job losses in west Offaly and north Offaly.

As highlighted in the introduction, we feel the current draft is completely retrograde in ambition compared with the aspirations of the outgoing plan. We feel it was drafted based on past performance rather than actual potential, and on European monetary policy that is currently out of date. It takes no account of the impact of COVID-19 on working and settlement patterns and behaviours. Tullamore should still be targeting a population of approximately 30,000 as this is the most obvious growth limiter based on the waste-water treatment facility that we actually have. However, it would appear that Irish Water is playing the role of a de-facto planning authority, limiting potential development in locations south of the canal that are ideally suited to development as sustainable neighbourhoods and providing for unbalanced development north of the canal where only three of the town’s eleven schools are located. This is the tail wagging the dog as far as Tullamore Chamber is concerned and the resultant lack of ambition in the plan sends completely the wrong message about where we see our

town going. Such conservatism is self-defeating and not even in line with national or regional policy. It is completely unacceptable and will be opposed vigorously.

Similarly, the contraction of the retail core to exclude all but one of the town's opportunity sites is ludicrous and bears no relation to current trends in consumer behaviour and the resultant accommodation requirements of retail investors. At a minimum, the retail core should encompass all opportunity sites, except #9 which is located adjacent to the bypass; otherwise for whom are these sites supposed to be an opportunity, and what is the nature of the development opportunity? As previously requested, Tullamore needs a permeability strategy and action plan. Low hanging fruit such as the link from O'Connor Square from the back of the library to Market Square and the canal blueway via Church Street, and the link between Tanyard Lane and High Street via Roselawn must be planned for and actioned. Similarly, to take account of retail developments that have already happened and have been granted planning, a major upgrade of Church Street/Church Road providing a safe, coherent link from Hayes' Cross to Dunnes Stores is required.

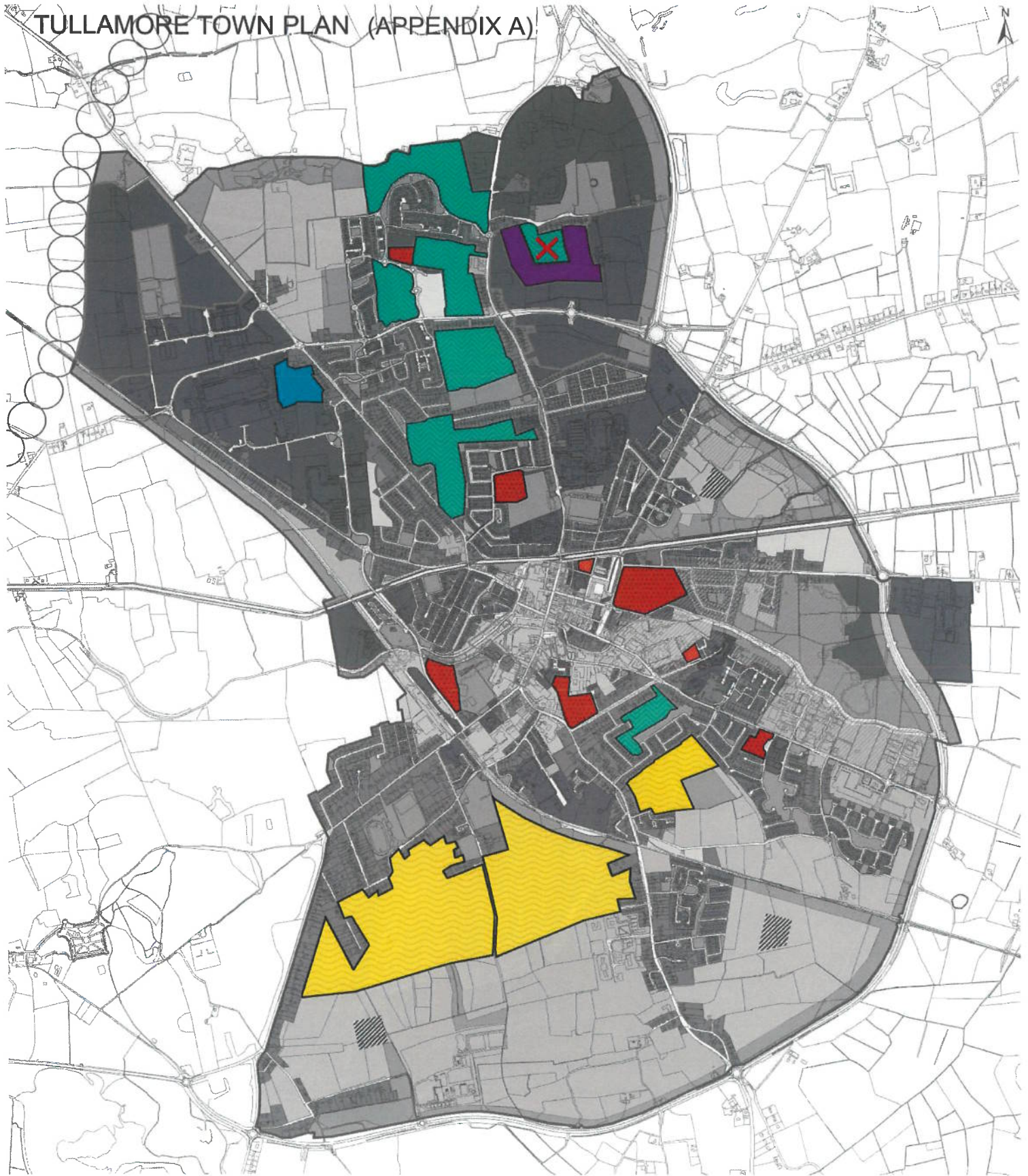
### **3. Climate Action & Energy**

As referred to previously, COVID-19 has provided a catalyst towards a reversal of longer-term trends towards long distance commuting. An accelerated shift towards remote-working creates an opportunity for Tullamore to fulfil its role as a Key Growth Settlement by attracting well paid professionals to settle in Tullamore on the basis of access to suitable accommodation, broadband, childhood education, amenities etc. However, the current draft zoning strategy features very little residential zoning. The residential zoning which is included is heavily weighted towards the north of the town, the M6 motorway and schools which are already over-subscribed.

Tullamore Chamber lobbied assiduously for the removal of planned growth limitations on towns from the Project Ireland 2040 and RSES documents. We did this to avoid the de-zoning of lands in Tullamore that were earmarked for development under the previous National Development Plan when Tullamore was a designated Gateway town. Offaly County Council have re-classified a lot of land which was previously zoned residential to strategic residential reserve. We feel strongly that these lands to the south of the canal are the better candidates to provide pedestrian and cycle links to the schools in town which have capacity, public transport, retail and services. We urge Offaly County Council to take account of their responsibility under the Ireland 2040 and EMRA RSES documents regarding providing compact urban growth, access to services and low-carbon sustainable economies. We are not suggesting the lands to the north be de-zoned but we urge Offaly County Council to engage with the forward planning department of the Department of Education to ensure that housing is located where access to school places exist. We feel Offaly County Council needs to be far more assertive in ensuring Irish Water provides treated water supply in line with our waste water treatment capacity, and in the locations which are best suited to the development of sustainable, low-carbon communities and economy.

Separately, but still on the topic of the environment, Offaly with such a high percentage of land in public ownership, is a prime candidate for reforestation and re-wilding. Environments with significant and mixed sources of locally generated renewable energy, forestry and biodiversity are prime candidates for data centre development. Rewilding need not be restricted to the rural environment. Urban greening is a very popular theme in modern architecture. More off-street/ back land car parking developments should be encouraged in Tullamore to allow for increased priority towards pedestrians, cyclists, carbon sinks and biodiversity areas.

# TULLAMORE TOWN PLAN (APPENDIX A)



EXISTING TOWN SCHOOLS



QUARRY



PROPOSED ZONED RESIDENTIAL

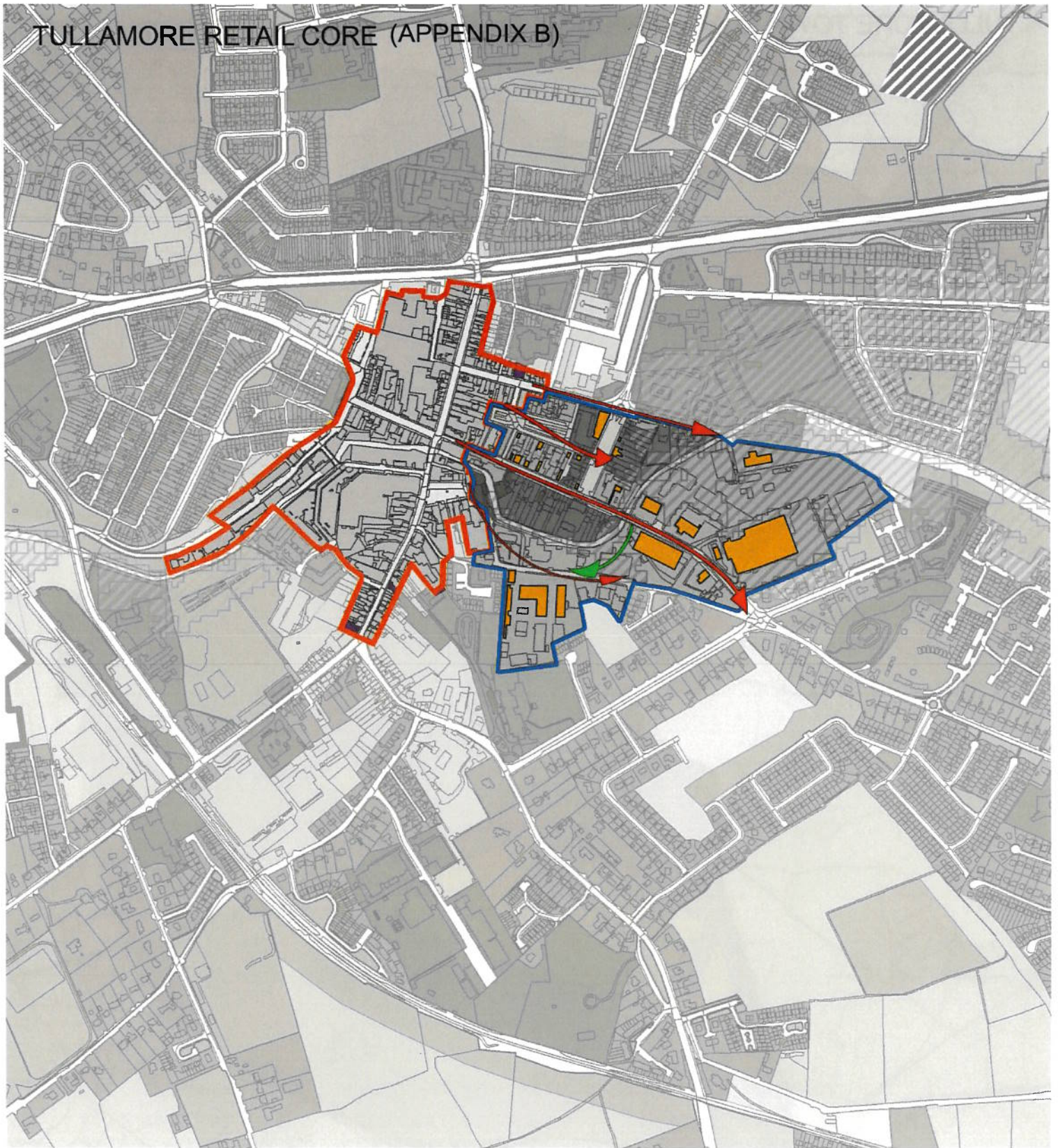


BUFFER ZONE



**KENNY LYONS**  
Associates  
Architects

## TULLAMORE RETAIL CORE (APPENDIX B)



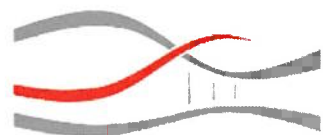
EXISTING RETAIL/BUSINESS



EXISTING LINK



FUTURE LINKS



**KENNY LYONS**  
Associates  
Architects