

Draft Offaly County Development Plan 2021-2027

Submission for rezoning of lands for part
of Wellwood to residential

John Flanagan Developments Ltd
September 2020



Introduction

1. This representation is submitted on behalf of John Flanagan Developments (JFD), which is the landowner of Wellwood, and particularly of the land indicated below as 'Wellwood Housing', comprising an area of approximately 4 ha of land at Wellwood, situated between the Tullamore Regional Hospital, to the west; Ardan Vale to the north; and, Harbour Walk to the south in Tullamore.



Source : Extract of extant TTEDP

Summary

2. JFD supports many broad principles of the draft OCDP, including its intentions to seek compliances with the NPF and RSES. JFD supports the focus on Tullamore as the Key Town within the County and which has to accommodate critical mass of population and jobs to achieve housing and economic development to act as the driver for the County and to support the role of Athlone as Regional Growth Town..
3. JFD considers, however, that the land put forward for housing development is not wholly appropriate to achieve these aims and considers that the land, the subject of the representation, should be zoned for residential purposes. It is free from constraint, can be accessed by vehicular traffic free from the by-pass, is owned by a house-builder and is available for development and, therefore, is clearly capable of facilitating the draft OCDP aims and objectives relating to housing provision and population growth early in the plan period.
4. The land is zoned in the Volume 2 Town Map for Tullamore in the draft OCDP for Community Services / Facilities (CSF), as part of a wider zoning on the land between the Hospital and the site of the Health Park, and is identified as an Opportunity Site (no 9).

5. The current draft zoning is for :

Community Services/Facilities The purpose of this zoning is to protect, provide and allow expansion of a wide range of different community facilities, civic facilities and social services ranging from education and health facilities to places of worships, community centres and childcare facilities. Ancillary facilities such as dedicated open space or sports facilities will normally be facilitated within this zoning objective.

Land Use Zoning Objective – Community Services/Facilities

It is an objective of the Council to: LUZO-09 Provide necessary community, social, health, public administration and educational services and facilities.

6. JFD considers there is no justification for the continued zoning of all this land within the emerging Plan for CSF uses and requests amendment to the Community Services / Facilities zoning (i) for residential development on the 4 ha of land identified above as Wellwood Housing), and (ii) to allow additional residential care and specialised residential uses within the definition of community services / facilities use.

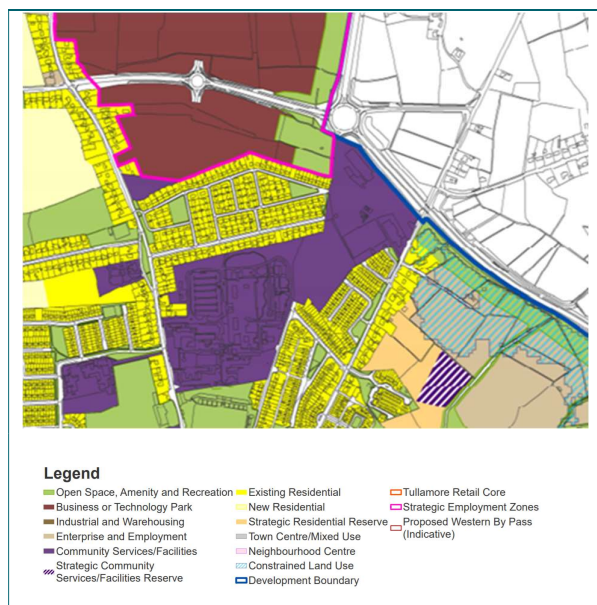
History

7. The site forms part of a wider areas of land. Until 2010, the site was partially zoned for Open Space/Sports/Recreation/Amenity and partially unzoned, but identified in the then TTEDP 2004 – 2010 that it *'could be developed for appropriate urban uses particularly if services become available'*. Planning permission was granted on 2007 for this wider area of land, reference TU446207 / 07360, for an Acute Hospital and Primary Care Centre and associated development. That permission was partially implemented (works commenced 2007) with the steel structure currently standing on the wider zoned site, but has not been completed due to the economic climate since that time.
8. The extant 2010 TTEDP acknowledged the then extant planning permission and zoned for land for Public / Community / Education and the appropriate period of the permission was extended in 2012, reference EX12055 although no further work has been carried out, again due to the economic situation. It became time-expired in 2017. There is no further justification for the extent of development or the land use proposed at this site for Public / Community / Education purposes except the now lapsed permission originating from 2007.
9. Pre-planning discussions have been held with OCC regarding the potential for the completion of the structure for nursing home and step-down facilities, and JFD received favourable response. It is anticipated that an application for planning permission will be submitted shortly for this proposed development. It is crucial that the final OCDP and Town Map accurately zones the land for the uses which will be delivered.

Justification / Reasoning

10. Leading up to 2007, there was a clear need for additional land within the vicinity of the Tullamore Hospital for additional healthcare facilities, and associated R&D and living accommodation. Accordingly, the Regional Healthcare Park was promoted, on a masterplan basis, to accommodate that development. The 2007 economic crisis altered that position, and which has not returned. The land was partially used previously for industrial and recreational purposes and is previously developed. It is wholly surrounded by built form.
11. JFD support the Strategic Vision of the draft OCDP and considers the residential zoning of this land will support the strategic objectives, including those of :
 - (i) Plan for a population increase in County Offaly during the plan period of 9,239 persons – the site can contribute to this achievement in the short term
 - (ii) Consolidate settlements by avoiding undesirable and inefficient sprawl on infill/ brownfield/ underutilised sites within the existing built-up footprint – the site is a partially brownfield, underutilised site surrounded on all sides by built form in this Key Town.
 - viii) Provide high quality housing of a sufficient scale, mix, tenure, sequence and density, located in optimum locations and aligned with adequate infrastructure, services and amenities – a high quality development comprising a mixed and sustainable population can be accommodated, all within close proximity to the man town centre, health and employment services of the County
12. The proposal, therefore, also meets the requirements for 'Compact Growth, Sustainable Mobility and Integrated Transport and Land use Planning' including policy *CAEP-18 It is Council policy to proactively encourage decarbonisation of local journeys by focusing on compact growth and reduced sprawl by targeting infill and brownfield lands in the existing built-up footprint of settlements.*

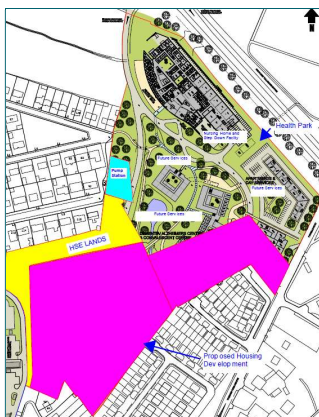
13. Notwithstanding the compliance of the site with the above, however, the draft OCDP has maintained the extant allocation for CSF. JFD notes, however, that despite this land not coming forward for this purpose during the entire period of the land (extended) development plan, there remains no assessment of the amount of land needed for CSF uses and the site remains zoned for such use. JFD considers that its retention as CSF is not justified.



Source : Extract draft OCDP

14. Whilst JFD accepts the intentions of the plan to ensure that sufficient land for CSF is zoned, and that land is available to accommodate the needs of the Hospital, JFD considers that lack of transparency regarding the *amount* of land required is a weakness of the draft OCDP, which therefore fails to meet the requirement for justified compact settlement growth. Retaining land in a land use without testing how much land is required for that use is not sustainable, particularly if there is need for the release of land for other essential land uses.
15. JFD has discussed the requirements of the Hospital with stakeholders. It appears from the draft OCDP documents that OCC has not completed this same exercise. Those discussions have led to the conclusion that the future needs of the Hospital can be met on the current hospital campus (for example by intensifying the use of the land currently laid out as car park to provide multi-storey parking, more efficient use of existing buildings and decanting administrative staff to locations elsewhere in Tullamore). It is not necessary to reserve this land for future hospital use, therefore, and which may have a negative impact on the draft OCDP intentions for the proposed Strategic Ardan Road SEZ which has '*potential to cater for the expansion of Midland Regional Hospital Tullamore and its continued development as a Teaching/University Hospital and/or to provide a Med or Bio Technology Park with linkages to the Hospital*'.
16. The zoning on the subject site and that SEZ are, therefore, potentially conflicting. This should be remedied in the adopted plan.
17. The draft OCDP documents provide no other justification that the land is required for any other CSF use and it is considered that to retain the site, which is partially previously developed, underused infill land, for an unidentified need is not sustainable and is contrary to the strategic aims of the draft OCDP.
18. As the wider land is within JFD ownership and control, the company has taken the opportunity to ensure that future Hospital needs can be met through this land. The plan below indicates the subject site, the potential redevelopment of the remaining CSF land and an area of land (coloured yellow) which has just been transferred to the HSE via legal contract. This will ensure accessibility to the bypass if required by

the regional hospital in the future. The residential zoning and development of the subject site, therefore, will not compromise access to the bypass for the regional hospital.



Yellow Land – Transacted to allow access; Pink Land – Subject Site; Illustrative Site Layout – Remaining land for CSF

19. The site is free from constraint and can be developed in the short term. It is capable of being serviced by Irish Water (pre connection agreement from IW attached). An area of land has been allocated (coloured blue) for expansion of the existing pumping station, in accordance with discussions with IW.
20. The proposed revision to the zoning to include for residential development on this land will meet numerous requirements of the draft CDP.
21. The Strategic Approach to the draft OCDP is identified at paragraph 2.4.5. An assessment of the approach (Column 1) is shown overleaf :

Identified approach (section 2.4.5)	Commentary	meet criteria?
Compact growth, by targeting at least 30% of all new homes that are proposed in settlements within their existing built-up footprints, with a focus on infill / brownfield lands, rather than continually sprawling outwards.	Site lies within the defined footprint of Tullamore, situated between hospital on 1 boundary, existing housing on 2 boundaries and previously developed land on fourth. It is previously developed land.	Yes
Making better use of under-utilised land and buildings including vacant, derelict and underoccupied buildings.	The land has been partially previously developed and is wholly surrounded by existing built form. The zoning will facilitate the completion of partially constructed development, as detailed above	Yes
Supporting, facilitating and promoting a transition to a low carbon society.	High quality, low carbon housing can be provided. Within walking / cycling distance of town centre and Tullamore Hospital – a major employer in the area. Opportunity to provide accommodation for students	Yes

	studying at the hospital and persons employed on short term contracts	
Strengthening town and village centres to meet their full potential.	Within walking / cycling distance of town centre – support the vitality and viability of the town centre	Yes
Aligning population, employment, community and housing growth in a balanced fashion.	Increasing population adjacent to essential hospital and healthcare services, and the proposed hospice within close proximity to town centre – services, employment sources and facilities, and in close proximity to education establishments	Yes
Sequential provision of housing and infrastructure.	The site is closer to the town centre for walking and cycling than most other allocated housing sites. Infrastructure and services are available. Sequentially preferable	Yes
Reversing the decline or stagnation of many villages.	Key Town, preferential for growth	N/A
Develop the designated Key Town of Tullamore of sufficient scale and quality to be a driver of regional growth, investment and prosperity, followed by Self-Sustaining Growth Towns and Self-Sustaining Towns to grow to a sustainable level.	Key Town, preferential for growth	Yes

22. At chapter 12, the draft OCDP states, in regard to Zoning Principles, that sufficient land should be zoned to meet population targets. JFD notes that this plan has not significantly changed or added land for residential zoning at Tullamore, a fact which it considers will lead to a lack of delivery of housing, contrary to the plan requirements. JFD considers that the Core Strategy does not need to identify an exact population growth number and that the Plan should allow for flexibility to address the fact that there is always a time-lag to delivery of housing. JFD considers that the adopted Plan should not start from a position of shortfall, should address existing lack of supply and should plan for an enhanced number of housing units.
23. At 4 ha, the residential development of this site would not significantly increase the housing provision to an extent that the plan would fall foul of requirements of the RSES and NPF, not least as the target for housing provision is through '*Encourage sustainable development and the redevelopment of brownfield sites within established settlements by targeting at least 30% of all new homes that are proposed for settlements in this Plan within their existing built-up footprints in accordance with the National Planning Framework (NPF)*'. Such delivery always takes longer than green field housing due to the inherent additional constraints on such land and there is no definitive assessment as to where such numbers will be derived on the ground within Tullamore. However, the subject land has been partially previously developed

and is without constraint to development. On this basis, it would facilitate meeting the target for 30% within existing footprint of Tullamore and would be delivered early in the plan period.

24. There are other specific policies which this subject site, if zoned for residential use, would specifically meet. The appropriate and relevant criteria are underlined :

SSP-02 It is Council policy to require at least 30% of all new homes that are targeted in settlements to be located within the existing built-up footprint of the settlements in an effort to make settlements more compact and reduce unsustainable urban sprawl and ribbon development.

SSP-03 It is Council policy to strengthen the core of settlements and encourage the compact growth of settlements by way of the development of infill sites, brownfield lands, under-utilised land / buildings, vacant sites, and derelict sites within the existing built-up footprint of the settlements, and develop outwards from the centre in a sequential manner.

SSP-07 It is Council policy to require sustainable, compact, sequential growth and urban regeneration in Tullamore by consolidating the built-up footprint through a focus on regeneration and development of town centre infill and brownfield sites, and encouraging regeneration of underutilised, vacant and derelict lands for residential development and mixed use to facilitate population growth.

25. At 8.4, the draft OCDP requires 'Sustainable Mobility', requiring a shift in modes of transport and prioritising cycling and walking as active transport modes. This is also carried forward in SMAP-06, SMAP-08 and SMAP-09, all of which encourage sustainable travel and an increase in pedestrian and cycling activity.
26. The draft OCDP also recognises at page 220 that '*An increase in the proportion of more compact forms of growth in the development of settlements of all sizes has the potential to make a transformational difference. It can bring new life and footfall, contribute to the viability of services, shops and public transport, increase housing supply and enable more people to be closer to employment and recreational opportunities, as well as to walk and cycle more and use the car less*'
27. The draft OCDP considers this can be achieved through :
- Focusing population and employment growth in urban areas – the residential zoning would increase the population with close level walking distance to the town centre (750m, 9 minutes), and in direct proximity to the hospital, a major employer



14 min
1.1 km

Source – Google Maps

- Providing alternative options to the car, namely, walking, cycling and public transport – vehicle transport movements would not be necessary to access all essential employment, health, cultural and other services

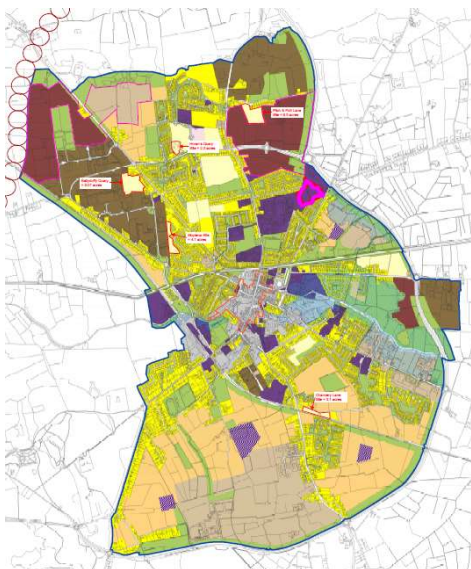
- Permeability and accessibility improvements – achieved through mixed residential, hospital and CSF uses / zonings
28. The subject site also forms part of Opportunity Site 9, which is supported by JFD, but it considers that to realise the development of this opportunity site, OCC needs to add flexibility into the zoning to ensure uses are proposed which can be delivered. It is the only Opportunity Site outside the apparent town centre boundary (which is undefined) yet is treated in the same manner as those within the central area.



Source – Extract draft OCDP

29. The opportunity sites are referred to more often in the Retail and Town centres section of the draft OCDP, much of which is irrelevant to the proposed CSF zoning. JFD, however, supports the commentary within Section 7.2.4 which specifically addressed Opportunity Sites and states that proposals for development should 'Promote mixed use and diversity, with a substantial amount of residential use', although this conflicts with the CSF zoning.
30. JFD supports the designation of the wider area as Opportunity 9, and that it should be developed for a significant amount of housing. It requests that draft is modified to ensure consistency between requirements for the land in relation to its Opportunity Site designation.
31. JFD considers however, that the OCDP needs to accept that development must be deliverable and viable and that OCC should not place unnecessary burden on bringing land, which is within the urban footprint, forward for development. It must accept, therefore, that parts of land zonings can be brought forward in the short term providing there is an overall concept which allows for the development of the remaining parts to be developed over the medium term of the remaining plan period.
32. It is clear from the history of the site and the failure of the extant TTEDP to deliver development on this land that the community uses zoning is no longer appropriate. The proposed mixed use of the entire opportunity site is consistent with the Core Strategy, will not frustrate intentions for the SEZ and the residential zoning will help deliver development. It will have the additional benefit that :
- Proximity to the Hospital gives opportunity for hospital employee accommodation

- The future resident population would benefit from proximity to existing Acute hospital, existing HSE nursing home, HSE respite facilities, HSE community healthcare facilities, proposed hospice , proposed nursing home, proposed stepdown facilities
 - Proximity to existing and proposed healthcare facilities offers potential for an efficient community healthcare service to the elderly within the proposed housing development,
 - The provision of specialised housing on the site specifically designed for the needs of, for example, the elderly will allow the future residents to decant from their existing family size housing units, be accommodated within their existing community and will in turn make these houses available to families, thus supporting the housing land supply for all generations.
33. There is scope for a mix of residential forms on this wider site, all of which are wholly consistent with the Plan requirements, whether that housing be market, affordable or specialised (paragraph 2.6.3):
- Student Accommodation following the Regional Policy Objective 4.70 in the RSES (2019) referral to the potential for complementary third level outreach educational facilities at Tullamore, particularly with regard to support for Regional Hospital Tullamore and where appropriate its continued development as a Teaching / University Hospital and the need for student accommodation within close proximity to that facility.
 - Affordable homes and their need to be built for sale or rent, particularly in towns and villages, enabling people to choose to live within their communities and closer to where they work.
 - Housing Needs of Older People, People with Disabilities and/or Learning Disabilities and the preference for social inclusion with housing within settlements and with easy access to public transport, community facilities, retail and other amenities.
34. There is potential for delivery of many forms of residential accommodation on the entire Wellwood site, all meeting essential sustainable principles, and policy DMS-81 should be accepted in the OCDP for Wellwood.
- DMS-81 Residential Care Homes, Retirement Homes, Nursing Homes, Retirement Villages and Sheltered Accommodation The location of residential care homes, retirement homes, nursing homes, retirement villages and sheltered accommodation is favoured in towns and villages for reasons of sustainability, accessibility, social inclusion, and proximity to the availability of services, except where a demonstrated need to locate in the open countryside because of the nature of the care required can be clearly established. Applications for residential care homes, retirement homes, nursing homes, retirement villages and sheltered accommodation consider and demonstrate the following:....
35. In the event that OCC considers that too much land is allocated for residential purposes in the OCDP, JFD is of the opinion that alternative land should not be developed for housing before this land, as detailed below. It is one of the most preferred sites for residential development, as detailed above, is ready for development with a housebuilder, is not constrained and meets all sustainable and strategic principles of the draft OCDP. The land is closer to the centre of Tullamore than other allocated land, is in single ownership and is serviced ready for development. There is no structural or other contamination issue and the site can be viable developed. JFD notes that the viability of a policy or zoning is not addressed in the plan and considers this a shortcoming. Deliverability is also not addressed and JFD, therefore, questions how OCC is able to be confident that housing requirements will be met.



Subject site edged pink (approximate); alternative lands which should be developed for housing after the subject site edged red with annotation box

Conclusion

36. JFD welcomes the opportunity to participate in this plan making process and is keen to support the growth and development of Tullamore and Co Offaly, in accordance with the NPF and RSES. It considers, however, that the draft OCDP, as currently laid out for consultative purposes, does not make the best use of scarce land resources.
37. It is requested that the current Community Services / Facilities zoning identified in Plan 1 above, and that part in the wider JFD land ownership is amended such that 4ha is specifically identified for residential development and that the CSF zoning is widened to allow for specialised form of residential development within the overall CSF zoning. It is considered that a mix of residential and (widened) CSF uses on this overall site is appropriate as :
 - It is an opportunity site, suitable for development
 - The site is partially previously developed
 - It is within the urban footprint of the town
 - It is surrounded on all sides by existing urban development / uses
 - It is within close walking and cycling distance of the town centre
 - There is synergy with the hospital
 - It is within one land ownership, the owner being a house builder so the land can be brought forward for development in the short term
 - It is free from physical constraint to development, a positive which does not relate to most other lands zoned for development.

John Flanagan Developments Limited [REDACTED]
[REDACTED]
[REDACTED]
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26 September 2018

Dear Sir/Madam,

Re: Customer Reference 4584542427 pre-connection enquiry - Subject to contract | Contract denied
Connection for 93 no. Single Domestic Houses

Irish Water has reviewed your pre-connection enquiry in relation to water and wastewater connections at Puttaghan, Tullamore, Co.Offaly. Based upon the details that you have provided with your pre-connection enquiry and on the capacity currently available in the network(s), as assessed by Irish Water, we wish to advise you that, subject to a valid connection agreement being put in place, your proposed connection to the Irish Water network(s) can be facilitated.

In the case of wastewater connections this assessment does not confirm that a gravity connection is achievable. Therefore a suitably sized pumping station may be required to be installed on your site. All infrastructure should be designed and installed in accordance with the Irish Water Code of Practice.

There is an existing 150mm uPVC water pipe adjacent to the proposed site which has sufficient capacity to serve the development.

The proposed connection to the existing foul sewer network for this development is feasible subject to upgrades. A survey and model build of the existing drainage network is currently ongoing and the result of which will determine the exact requirements of the upgrades. Further details on the required upgrades can be discussed at Connection Application stage.

There is an existing 225mm foul sewer and 150mm uPVC water main running through the site. The customer may choose to design their housing layout around the existing assets or alternatively divert the existing assets. If the customer wishes to divert the assets, a diversion agreement will be required. Please contact the Irish Water Diversions unit to arrange this, they can be contacted by emailing [REDACTED]
[REDACTED]

All infrastructure should be designed and installed in accordance with the Irish Water Codes of Practice and Standard Details. A design proposal for the water and/or wastewater infrastructure should be submitted to Irish Water for assessment. Prior to submitting your planning application, you are required to submit these detailed design proposals to Irish Water for review.

You are advised that this correspondence does not constitute an offer in whole or in part to provide a connection to any Irish Water infrastructure and is provided subject to a connection agreement being signed at a later date.

A connection agreement can be applied for by completing the connection application form available at **www.water.ie/connections**. Irish Water's current charges for water and wastewater connections are set out in the Water Charges Plan as approved by the Commission for Regulation of Utilities.

If you have any further questions, please contact [REDACTED] [REDACTED] [REDACTED]
[REDACTED]. For further information, visit **www.water.ie/connections**

Yours sincerely,

Maria O'Dwyer
Connections and Developer Services