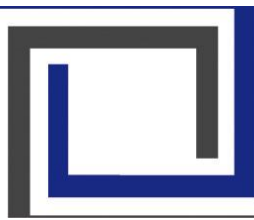


This submission has been compiled to seek the following amendment: The subject lands to be retained in the Development Boundary of Ferbane within the Draft Offaly County Development Plan 2021-2027 and to be zoned for New Residential, having regard to the local character of the town, the location of the land, the best and most economic use of developed infrastructure in the surrounding area and that these lands are currently zoned for Residential within the current Offaly County Development Plan 2014-2020.



Draft Offaly County Development Plan 2021-2027
Forward Planning Section
Offaly County Council
Áras an Chontae
Charleville Road
Tullamore
County Offaly

7th October 2020
[By email: Online Consultation Portal]

DRAFT OFFALY COUNTY DEVELOPMENT PLAN 2021-2027

Dear Sir / Madam

RE: SUBMISSION TO THE DRAFT OFFALY COUNTY DEVELOPMENT PLAN 2021-2027 IN RESPECT OF LANDS FOR EXISTING RESIDENTIAL AT BALLYVORA, FERBANE, CO. OFFALY

Samleigh Properties Ltd. – Site Specific Zoning Submission in regards to the Consideration to keep the *Residential* Land Use Zoning Designation on Lands at Ballyvora, Ferbane, Co. Offaly.

1.0 INTRODUCTION

The Planning Partnership, The Bank Building, 52 Oliver Plunkett Street, Mullingar, Co. Westmeath are instructed by **Samleigh Properties Ltd.**, Barnan, Rhode, Co. Offaly in respect of the consideration to keep the currently designated Offaly County Development Plan (Ferbane) 2014-2020 **Residential** Land Use Zoning Designation and its appropriate extension to existing serviced lands on a parcel of land within the *Draft Offaly County Development Plan 2021-2027*

1.1 Focus of Submission

The purpose of this submission is to seek a retained and partial extended designation of the subject lands as **New Residential** zoned land within the *Draft Offaly County Development Plan 2021-2027* as these lands are currently zoned (in part) for **Residential** within the *Offaly County Development Plan 2014-2020*. The location and extent of the subject lands, which is in the ownership of **Samleigh Properties Ltd.**, is identified within **Figure 1.1**, below.

1.2 Executive Summary: *Our Request*

This submission has been compiled to seek the following amendment:

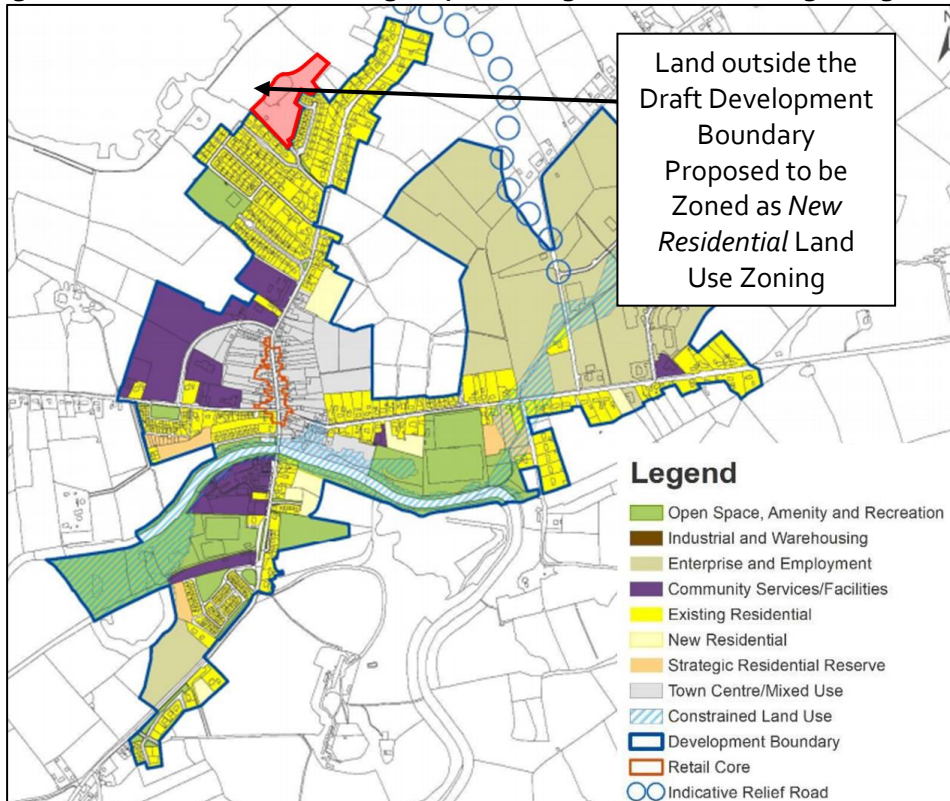
The subject lands to be retained in the **Development Boundary** of Ferbane within the *Draft Offaly County Development Plan 2021-2027* and to be zoned for **New Residential**, having regard to the local character of the town, the location of the land, the best and most economic use of developed infrastructure in the surrounding area and that these lands are currently zoned for **Residential** within the current *Offaly County Development Plan 2014-2020*.

Figure 1.1: Aerial Image of the Subject Land at Ballyvora, Ferbane, Co. Offaly



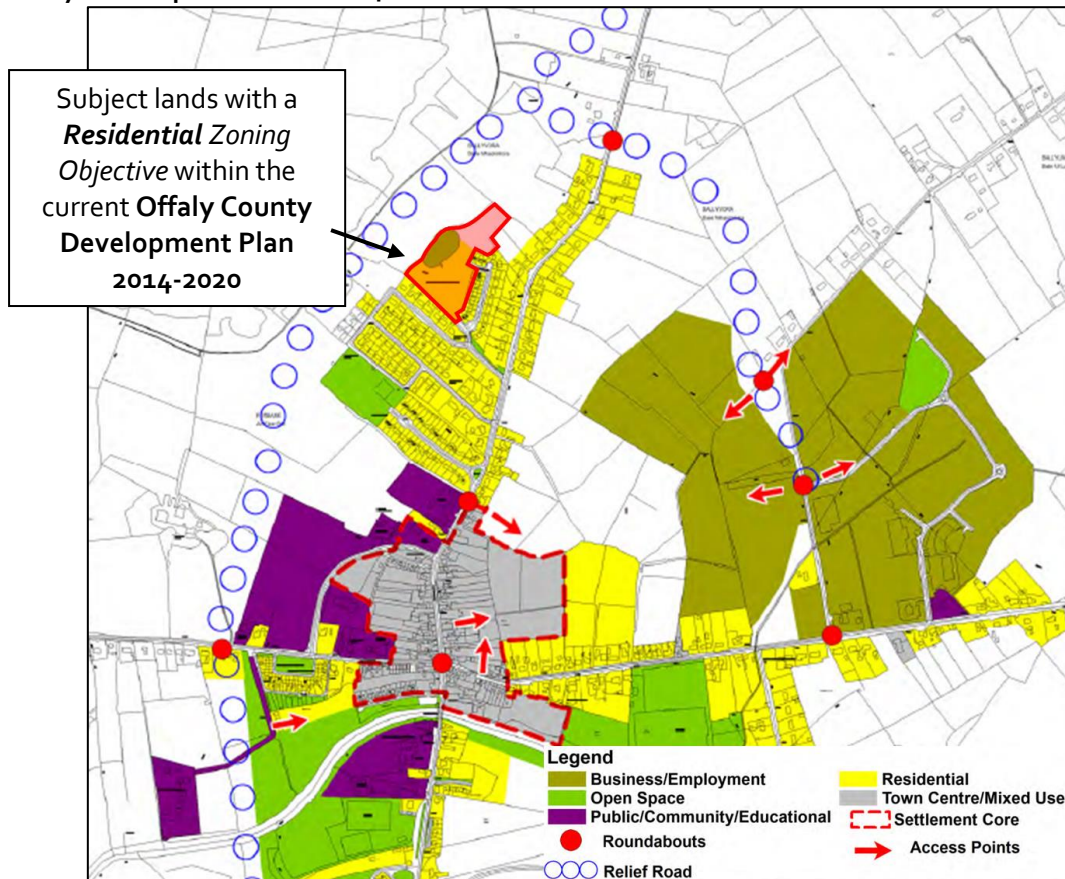
Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership, October 2020

Figure 1.2: Draft Ferbane Zoning Map omitting Residential Zoning Designation



Source: Ferbane Town Zoning Map extracted from the *Draft Offaly County Development Plan 2021-2027*, reproduced and annotated by The Planning Partnership under OS Licence No.: AR0114720

Figure 1.3: Existing Ferbane Zoning Map Demonstrating the current *Residential Zoning* - Offaly County Development Plan 2014-2020



Source: Ferbane Town Zoning Map extracted from the Current *Offaly County Development Plan 2014-2020*, reproduced and annotated by The Planning Partnership under OS Licence No.: AR0114720

1.3 Very Particular Circumstances of Submission

It is the purpose of the planning system to **create certainty** and within this (and the respective development plan process), **security of investment** for land owners, developers and residents alike.

The potential removal of the subject lands, which has undergone **significant investment to date** and where a previous scheme was partially completed with adequate infrastructural investment undertaken to date and with a significant and realistic expectation that the investment (through a difficult economic cycle) would enable the completion of the development is unfairly prejudiced by the subsequent **de-zoning** of lands.

Samleigh Properties Ltd., the landowner has successfully delivered quality and well serviced housing to date in a walkable distance to the town centre and well serviced by community infrastructure. The subsequent de-zoning and refocussing of lands in areas which may not be as well served with infrastructure connections (underground and surface i.e footpaths) whilst providing potentially more 'sequentially' suitable sites are not as preferable in terms of providing the necessary 'active land management' credentials as presented to date by the current occupier, developer and landowner.

The subject lands are currently subject of a planning application as referred further below. It is incumbent upon planning authorities to engage in the process of **'Active Land Management'** and ultimately with proven landowners and developers who can deliver housing, not land bank or stem the flow of development land which artificially inflates land values (a cause of the current housing crisis) and where the principles of 'use it or lose it' are emerging as the most effective delivery mechanism.

2.0 NATIONAL AND LOCAL PLANNING POLICY CONTEXT

The following relevant extracts from national and local policy support the current submission.

National Planning Framework - Project Ireland 2040

The 'liveability' or quality of life in urban places (Page 28)

How people experience living in cities, towns and villages. This includes the quality of the built environment, including the public realm, traffic and parking issues, access to amenities and public transport and a sense of personal safety and well-being.

Making the continuous regeneration and development of existing built up areas as attractive and as viable as greenfield development. This requires greater certainty and cost equalisation as a result of a steady supply of sites and land and investment in infrastructure and amenities through more active land management in urban areas.

National Policy Objective 3a

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

National Policy Objective 6

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 18a

To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.

National Policy Objective 27

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activities for all ages.

National Policy Objective 28

Plan for more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

National Policy Objective 33

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 34

Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

Draft Offaly County Development Plan 2021-2027: Draft Stage Ferbane Town Plan

1.4 Town Function and Development Trends

Ferbane is classified as a 'Town' in the Settlement Strategy of the Offaly County Development Plan 2021-27 and performs important retail, residential, employment,

service and amenity functions for local rural hinterlands. The population allocation contained in the Core Strategy in Volume 1 of this County Development Plan provides for an extension befitting Ferbane's position in the county settlement hierarchy.

1.5 Strategic Aims for Ferbane

- 1. Reinforce Ferbane town centre as the heart of the town by avoiding undesirable and inefficient sprawl, achieving critical mass and consolidating new development within the built-up footprint of the town, through targeting a significant proportion of future development on infill/brownfield/underutilised sites and extending out sequentially subject to available infrastructure.*
- 3. Deliver high quality housing of a sufficient scale, mix, tenure, sequence and density, located in optimum locations and aligned with adequate social and physical infrastructure.*
- 4. Promote permeable, healthy sustainable communities that focus on place making and a sense of well-being to ensure Ferbane is an attractive place to live and work.*
- 8. Early and/or timely provision (in tandem with development), of key physical and social infrastructure necessary for the future sustainable growth of Ferbane town.*

4 Residential

This Settlement Plan provides for new residential areas in Ferbane primarily to the north east, east and south of the Town Centre with other pockets of land on infill sites/brownfield sites in different areas identified suitable for housing also.

RO-01

Secure the provision of social infrastructure, community and recreational facilities in tandem with residential development.

RO-02

Encourage the appropriate redevelopment of brownfield and infill sites for mixed uses within the existing built-up footprint of the town.

RO03

Require that an appropriate mix of housing type, tenure, density and size is provided in all new residential areas and in appropriate brownfield/infill areas to meet the needs of the population of Ferbane, including the provision of appropriate supported housing and longer-term residential care solutions designed for older people and/or people with disabilities.

KIO-07

Support the progressive improvement of the amenity/walking/cycling network, to include existing and enhanced public footpaths along the main streets, and approach roads, including indicative internal distributor roads, providing linkages to existing and new developments, existing and future schools, cycling routes/lanes where possible and amenity corridors linking town centre, residential, community facilities, public amenities, commercial and transport nodes.

Draft Offaly County Development Plan 2021-2027

2.1.4 Principles of Growth

*(viii) In order to achieve more **balanced and sustainable** development, some settlements need to attract increased population, whereas others need more jobs, amenities or better transport links*

*(xiii) Developing **serviced zoned land and serviceable zoned land** within the life of this County Development Plan*

*(xvi) Towns and villages to become more attractive, well-designed, of high quality design and 'liveable' through **healthy place-making***

Towns (Banagher, Clara, Daingean, Ferbane, Kilcormac)

SSP-10 - It is Council policy to support housing and repopulation taking place within towns in a consolidated, sustainable and sequential manner, and to promote the provision of serviced sites supported by Irish Water in order to attract people to build their own homes and live in small towns, whilst also managing the levels of growth at an appropriate scale to ensure compliance with the Core Strategy Table.

9.25 New Residential Developments

All proposals for large scale residential developments must consider existing or future community facilities. Sustainable neighbourhoods require a range of community facilities. The Council will seek to ensure that facilities for social and cultural use, such as resource centres, are available within the community. Such facilities play an important role in helping to create a vibrant community and thereby contribute to the quality of life of the residents in the area and are vital to their wellbeing. This requirement will ensure that new residential areas in the county will have access to local community facilities.

Regional Spatial and Economic Strategy (Eastern & Midland Regional Assembly) 2019-2031**PRO 4.78 (Page 97)**

Development Plans should support the development of a 'New Homes in Small Towns and Villages' initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of service and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.

PRO 4.83 (Page 97)

Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the County Development Plans.

Guiding Principles for the creation of healthy and attractive places (Page 205)

- Public open spaces to have good connectivity and be accessible by safe, secure walking and cycling routes

PRO 9.10 (Page 206)

In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces.

Planning for recreation and open space (Page 207)

Facilitate a sufficient supply of good quality sports and recreation facilities, including networks for walking, cycling and other activities and shall maximise the ,multiple use of such facilities by encouraging the co-location of services between sports providers, schools, colleges and other community facilities.

RPO 9.14 (Page 207)

Local Authorities shall seek to support the planned provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities have access to a range of facilities that meet the needs of the communities they serve.

3.0 BASIS OF SUBMISSION

Retaining the subject lands zoned as *New Residential* is consistent with the proper planning and sustainable development of Ferbane. As detailed within the *Draft Offaly County Development Plan 2021-2027*, the purpose of the *Proposed Residential* land use zoning is:

LUZO-04: Provide for new residential development and other services incidental to residential development.

Having regard to the foregoing and noting that the subject land is immediately adjacent to the Ferbane Development Boundary and provides the ability to present;

- a logical form and pattern of development to support the sustainable and logical growth of the town settlement
- where the site presents in in close proximity to other neighbouring residential areas such as Ard Glas residential estate, Ballyvora Grove residential estate and Knockaaulin Drive estate.
- the subject site is in walking distance to the town centre of Ferbane which includes a wide range of facilities such the Ferbane Pitch & Putt Club, Ferbane Heritage Centre, Church of Ireland and Ferbane Care Centre. The West Offaly Lions Rugby Football Club, Gallen FC and the Ferbane GAA Club are all in close proximity to the subject site.
- due to the excellent pedestrian access links to all of these sites, the subject site accommodates for active transportation to occur for all age groups and enhances Ferbane to be a sensitive neighbourhood area
- represents suitable and best use of economic resources where infrastructural investment has been focussed most recently.

It is therefore contended that **the subject lands should be zoned as *New Residential* in the *Draft Offaly County Development Plan 2021-2027* consistent with the proper planning and sustainable development of Ferbane and to deliver much needed residential units to consolidate the current form and development of the Town.**

As illustrated within Image 3.1, below, the subject site is located adjacent to existing residential development with established infrastructural links and the topography of the land is relatively flat allowing for no obstruction to development to occur on the subject land.

Image 3.1: Neighbouring Residential Units and Topography of the Subject Land



Source: Photo taken by The Planning Partnership on 2nd of October 2020

Image 3.2: Residential Area adjacent to Subject Site indicating a Variety of Housing Types, Density and Tenure



Source: Photo taken by The Planning Partnership on 2nd of October 2020

Image 3.2 indicates that the adjoining residential community has a variety of housing types ranging from single storey and two storey units, a mixture of semi-detached and detached two storey residential units. The same approach will be taken for the subject site as the landowner and applicant is one of the same and who made the application for the Ard Glas neighbourhood, indicated in Image 3.2 above.

4.0 PLANNING HISTORY OF SUBJECT SITE

4.1 Planning History for the Ard Glas Neighbourhood

Figure 4.1 below, indicates the planning permission applied and Granted for the Applicant to develop a residential development adjacent to the subject site. The Applicant intends to carry out an extension to the existing residential development on the subject lands linking to the town centre with the existing provision of easy walking and cycle network including a road network. With the provision of a wider range of housing types, this will generate a lifelong neighbourhood scheme within Ferbane and allow for all age groups to travel safely to the town centre and the amenity areas located in Ferbane without the need for motor vehicles, positively meeting the objectives of the climate change agenda.

Figure 4.1: Planning History for the Ard Glas Neighbourhood

File Ref No:	051446
Applicant:	Matt Kelly
Date Lodged:	22 nd December 2005
Development Description:	Construction of 60 no. houses comprising of 50 no. two storey semi-detached houses, 2 no. two storey detached houses and 8 no. single storey detached houses and all ancillary
Decision Date:	11 th July 2006
Outcome:	Planning Permission GRANTED (Conditional)

As illustrated in Figure 4.2 below, the Applicant has presented an application for the subject site which includes a mix of housing types ranging from single floor units with 2 beds, and three beds with double floor units with 3 beds and linkages to the adjacent residential area. This application has been lodged (Offaly Co. Co. Reg. Ref: 20/461) and the Applicant intends to have the proposed development completed within the lifetime of the *Draft Offaly County Development Plan 2021-2027*

The landowner has been actively engaged in providing homes and delivering serviced lands to the benefit of Ferbane Town for the lives of successive Development Plans.

Figure 4.2: Submitted Residential Development Scheme (OCC Reg. Ref: 20/461)



Source: Design Developed by John Madden & Associates

Image 4.1: Sensitive Traffic Calming Network and Pedestrian Walkways



Source: Photo taken by The Planning Partnership on 2nd of October 2020

As illustrated in Image 4.1 above, the current planning application (20/461) on existing zoned lands in an adopted development plan can be determined favourably and the benefits of active investment in infrastructure to date can be economically delivered.

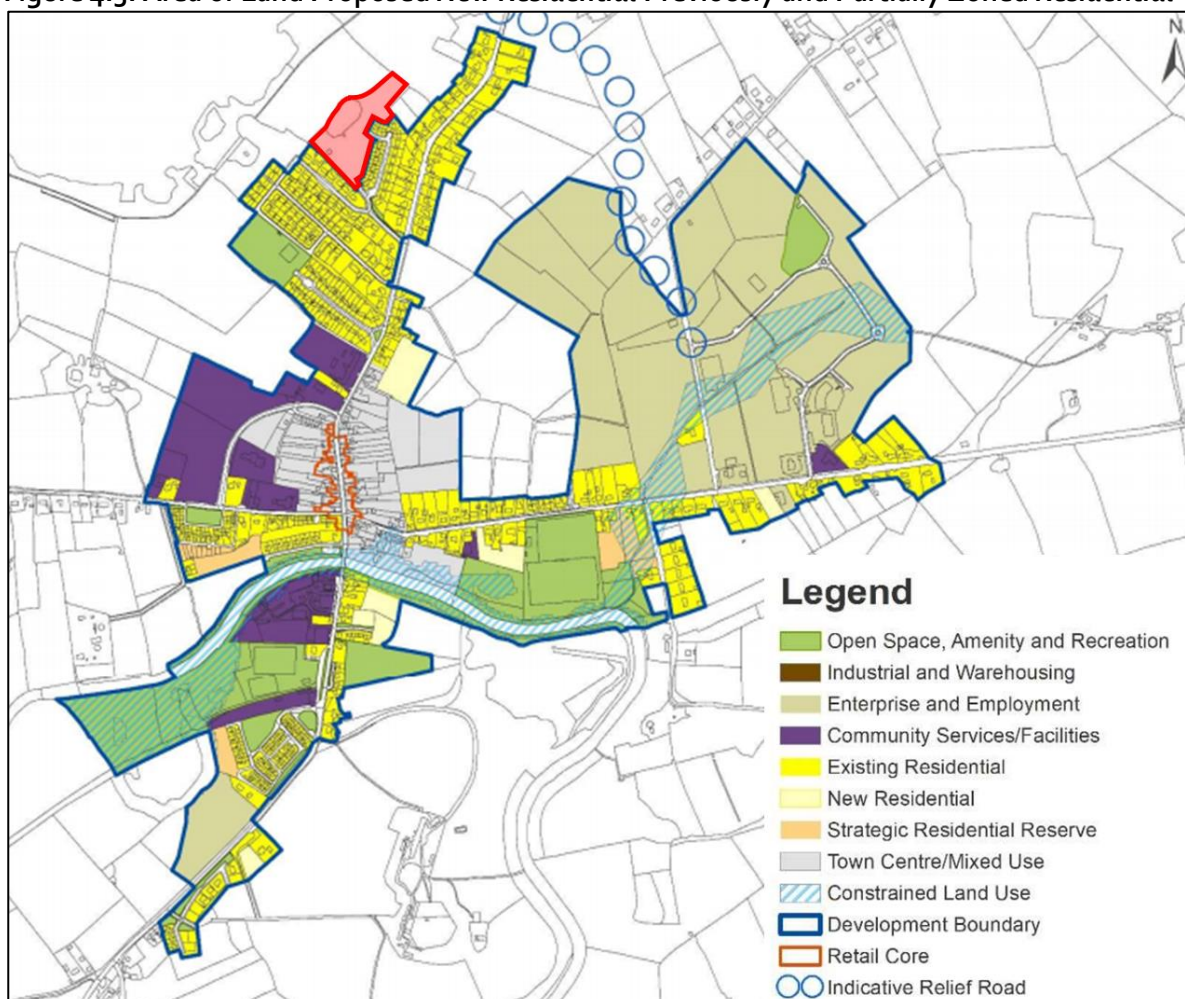
The subject lands if 'de-zoned' will undermine the proper and orderly development of the subject lands where there is additional opportunity to deliver an extended sensitive **neighbourhood** scheme which is a **sustainable community** and includes a **mix of housing types, densities, and tenure**.

5.0 OUTCOME SOUGHT

The submission herein to retain and extend the current **Residential** land use zoning designation is fully consistent with the settlement pattern of the town, as it graduates from an *established residential* area with a wide range of *open space and community services* to a *strong town centre* to a strong established *residential community*. The consolidation of the settlement and the supply of new housing for the intended focus of the plan to attract inward investment and employment opportunities will lead to a 'self-sustaining' town model. The vast landholdings identified for employment generation will be best served to attract employers by provision of residential units for an anticipated growth in requirements for a local labour force.

All these areas accommodate active transportation to occur due to the excellent pedestrian footpaths linking these areas together. It is therefore, contended that **the subject land should be retained in the Ferbane development boundary as New Residential land use zoning due to the strong contributions the subject land can provide to the sustainable and consolidated growth of the community of Ferbane.**

Figure 4.3: Area of Land Proposed *New Residential* Previously and Partially Zoned *Residential*



Source: Draft Offaly County Development Plan 2021-2027 – Annotated by The Planning Partnership October 2020

Retaining the zoning for the subject lands as **New Residential**, will facilitate the making of a Planning Application(s) for Residential use, ensuring that the town development boundary is suitably contained and therefore achieving proper planning and sustainable development of Ferbane to occur within the time frame of the *Draft Offaly County Development Plan 2021-2027*.

The proposed '**de-zoning**' of the subject lands will curtail the '**active land management**' objectives of the **Urban Regeneration and Housing Act 2015** and undermine the objectives of **Rebuilding Ireland**.

Therefore, we respectfully contend that the submission to retain and extend (as annotated) the subject lands under the *New Residential* land use zoning designation is entirely consistent with the proper planning and sustainable development of the Town of Ferbane.

5.1 Acknowledgement of Sequentially Preferable Sites

Whilst we note the planning authority has identified *New Residential* zonings in closer proximity to the Town we also note that there are potential infrastructural limitations in respect of these sites namely in respect of access, pedestrian linkages and proximity to the floodplain and issues of Flood Risk. Furthermore, the proposed *New Residential* zoned lands cannot match the level of activity and investment incurred to date by the subject lands.

We would contend that all sites could suitably co-exist within the Draft Plan but where the site in the ownership of Matt Kelly is significantly more advanced and "infrastructure ready".

6.0 CONCLUSION

In summary, this submission is made to encourage and highlight the subject lands availability as located at Ballyvora, Ferbane, Co. Offaly, which is currently zoned, to be retained in the Development Boundary as **New Residential** zone in the *Draft Offaly County Development Plan 2021-2027*.

Having regard to the foregoing, it is respectfully requested that Offaly County Council retain and extend the *New Residential* zoning in the Development Boundary for the *Draft Offaly County Development Plan 2021-2027 (Ferbane Town)*, as will promote the best use of urban land, deliver much needed housing supply and allow for the best use of existing infrastructure and economic resources and as will promote most recent policy reflected in the **National Planning Framework, Rebuilding Ireland** and the **Urban Regeneration and Housing Act 2015**.

Should you have any queries or require any further information in relation to the above please do not hesitate to contact me.

Yours faithfully



Mark Brindley
Principal
The Planning Partnership