

This submission is made by Downey Planning, on behalf of our client Destrina Ltd, and is submitted to Offaly County Council in the context of the Draft Offaly County Development Plan 2021-2027. Our client owns approximately 4.68 hectares of lands at Military Road, Crinkle, Birr, Co. Offaly. Under the current Development Plan for the area, the lands are zoned for 'New Residential' land uses. However, under the Draft Development Plan, approximately two-thirds of these lands have been proposed to be rezoned to 'Strategic Residential Reserve' and this submission seeks to have these lands returned to a 'New Residential' land use zoning. A copy of the detailed submission is attached.

October 2020

Development Plan Submission



Draft Offaly Development Plan 2021-2027 (Stage 2)

Lands at Crinkle, Birr, Co. Offaly

On behalf of: Destrina Ltd



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Executive Summary

- This submission is made by Downey Planning, on behalf of our client Destrina Ltd, and is submitted to Offaly County Council in the context of the Draft Offaly County Development Plan 2021-2027, which is currently on public display.
- Our client owns approximately 4.68 hectares of lands at Military Road, Crinkle, Birr, Co. Offaly. Under the current Development Plan for the area, the lands are zoned for 'New Residential' land uses.
- However, under the Draft Development Plan, approximately two-thirds of these lands have been proposed to be rezoned to 'Strategic Residential Reserve' under the Draft Plan.
- Our client is seeking to have this portion of their lands zoned as 'New Residential', in keeping with the remainder of their lands at Crinkle.
- Our client, who is an experienced developer and house builder, has engaged in Section 247 pre-planning consultation with the Planning Authority regarding a proposed residential development on the subject lands and has submitted a Pre-Connection Enquiry to Irish Water for this proposed development.
- The lands can be readily connected to the existing foul sewer network on Military Road.
- Should the lands be zoned as a 'Strategic Reserve' then it would prevent much needed family homes being delivered in the area, including those for social and/or affordable housing.
- The delivery of family homes will help to sustain essential services and retail/commercial outlets in the area.
- The zoning of the entire Destrina Lands as 'New Residential' is in accordance with the policies and objectives of the Development Plan and national and regional planning.

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1.0 Introduction

In accordance with Section 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended), Downey Planning, Chartered Town Planners, 1 Westland Square, Pearse Street, Dublin 2, on behalf of our client, Destrina Ltd., Marine House, Clanwilliam Court, Dublin 2, wish to make this submission to Offaly County Council regarding the Draft Offaly County Development Plan 2021-2027.

This written submission is made in response to an invitation for comments from interested parties by Offaly County Council. This submission is being made within the specified timeframe for submissions i.e. 7th October 2020, as set out on the Draft Development Plan's website.

Our client owns approximately 4.68 hectares of lands at Military Road, Crinkle, Birr, Co. Offaly. Approximately two-thirds of these lands have been proposed to be rezoned to 'Strategic Residential Reserve' under the Draft Plan. However, our client is seeking to have this portion of their lands zoned as 'New Residential', in keeping with the remainder of their lands at Crinkle.

We would also highlight that our client is also the registered owner of the lands used by the Crinkle National School for their sports field. This area is fenced off from the remainder of the Destrina Lands and cuts into the rest of the Destrina lands. It is important to note that our client are not seeking to rezone these lands.

2.0 Planning Legislation

Section 9 of the Planning and Development Act, 2000 (as amended) provides that, subject to the requirements set out in Section 9, 10, 11 and 12 of the Act, that a planning authority must adopt a new Development Plan every six years. The contents of the Development Plan are set out within Section 10 of the Planning and Development Act, 2000 (as amended) and must include a strategy for the proper planning and sustainable development of the area of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question. The process for the preparation of the Draft Development Plan is contained within Section 11 of the Planning and Development Act, 2000 (as amended) and the consultation process of the Draft Development Plan is contained within section 12 of the Planning and Development Act, 2000 (as amended), which states:

"12 - (1) Where the Draft Development Plan has been prepared in accordance with section 11, the planning authority shall within 2 weeks of the period referred to in section 11(5)(c)—
(a) send notice and a copy of the Draft Development Plan to the Minister, the Board, the relevant regional authority, the prescribed authorities, any town commissioners in the area and any city or county development boards in the area, and
(b) publish notice of the preparation of the draft in one or more newspapers circulating in its area.

(2) A notice under subsection (1) shall state that—
(a) a copy of the draft may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly), and

(b) written submissions or observations with respect to the draft made to the planning authority within the stated period will be taken into consideration before the making of the plan”.

This submission to the draft of the Development Plan is being made in accordance with Section 12 (2) (b) of the Planning and Development Act, 2000 (as amended) and is being submitted within the specified timeframe (7th October 2020) as set out on the website of the Offaly County Development Plan 2021-2027.

3.0 Site Location and Description

The subject lands, which extend to approximately 4.68 hectares, are located in Crinkle, Birr, which is within the functional area of Offaly County Council. The lands comprise agricultural lands that are accessed via an existing entrance on Military Road.

The subject site enjoys excellent connectivity to the amenities and community facilities within the area Crinkle/Birr. The subject site is 2.2km from the centre of Birr (approx. 4 min drive/7 min. cycle), where residents can enjoy the village and the facilities within it.

The subject site is well supported by schools, recreational areas and sports clubs as well as areas that can provide employment opportunities, such as, Syngfield Industrial estate and Birr town.

The surrounding built environment is characterised by residential, educational and agricultural developments with a mix of building types, all of which have resulted in varying building heights and forms within the area.



Figure 1. Aerial view of lands subject to this submission (outlined in red)

4.0 Planning History

Downey Planning have carried out a detailed examination of the planning history pertaining to the subject lands and surrounding area, which is summarised as follows:

Subject Lands

- **Reg. Ref. 10/213** – By Order dated, 15th January 2011, Offaly County Council granted planning permission for development consisting of; demolition of 3 existing agricultural outbuildings and the construction of 31 residential dwellings comprising of 10 no. 4 bedroom and 21 no. 3 bedroom detached single storey houses with associated landscaping, open space, riverside walkway, right of way to adjoining lands underground surface water attenuation, roads with vehicular access onto Military Road and School Street and other infrastructural and site works on a site of 7.1 hectares which contains a protected structure RPS Ref: 53-09 Beechpark House its curtilage and Gate Lodge within the Boundary of the Proposed Development.
- **Reg. Ref. 08770**– By Order dated, 17th October 2008, Offaly County Council Refused planning permission for development consisting of; Demolition of 3 existing agricultural outbuildings and the construction of a 200 sq. m creche and 101 residential dwellings varying in mix of 2, 3 and 4 bedrooms comprising: 12 no 2 bedroom two storey semi-detached houses; 67 no 3 bedroom two storey semi-detached houses, 22 no 4 bedroom two storey semi-detached houses together with 1 no below ground attenuation area, access roads, landscaping and open space and all associated site works. The proposed development site is adjacent to Beechpark house, a proposed protected structure in the draft Offaly County Development Plan 2009-2015, draft rps no. 745. The Gatelodge within the curtilage of Beechpark house and therefore part of the proposed protected structure designation, is located within the boundary line of the proposed development

It is noted that Downey Planning engaged in a pre-planning consultation with the Planning Authority in January 2020 and a Pre-Connection Enquiry has been submitted to Irish Water regarding a potential residential development on the Destrina lands.

Additionally, there is relevant recent planning history on the lands to the immediate north that have been considered in this examination, this planning permission is as follows:

Lands to the immediate north

- **Reg. Ref. 071146** – By Order dated, 12th September 2007, Offaly County Council refused planning permission for development consisting of; Demolition of existing agricultural outbuildings and a modern detached single storey house and the construction of 137 residential dwellings varying in mix of 2,3 & 4 bedrooms and also in height from single storey to two storeys, comprising 20 no. 4 bedroom semi-detached houses, 8 no. 3 bedroom semi-detached houses, 15 no. 3 bedroom detached bungalows, 68 no. 3 bedroom terrace houses, 26 no. 2 bedroom terrace houses, outline permission sought for change of use of existing Beechpark house to a 285sq.m. Creche facility, together with 1 no. Below ground attenuation area, access roads, landscaping and open space and all associated site works, on residentially zoned lands within the development area of the village. Two off street parking spaces are

provided per dwelling and 43 on street visitor parking spaces are provided totalling 317 parking spaces.

5.0 Planning Context

Having set out the location and history of the subject lands, this submission shall now set out the planning context of the subject lands.

5.1 National Planning Context

Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is *“the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040”*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the National Planning Framework that *“a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages”*.

The NPF seeks to target 50% of population growth to outside of the country’s five main cities (above 50,000 population) and to consolidate such growth into Ireland’s large towns, villages and rural areas and therefore the subject lands, being within the Birr catchment would be consistent with this aim.

The NPF states that *“the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.”*

It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to *“prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure”*.

The overarching emphasis of the NPF is on renewing and developing existing settlements, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. In this regard, the NPF sets a target for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites.

The provision of a residential development on the subject site in this instance will therefore be in accordance with the NPF’s target of 40% of new housing to be located within existing towns and for 50% of population growth to take place within Ireland’s existing settlements, outside of the five larger cities (i.e. Dublin, Cork, Limerick, Waterford, Galway).

The NPF also seeks to develop stronger regions, including Offaly (Birr/Tullamore), to support their continued economic growth. The NPF sets a number of policy objectives that support housing in appropriate locations such as these lands at Crinkle, including:

“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 35: Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights”.

Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)

Rebuilding Ireland, an Action Plan for Housing and Homelessness, provides a multi-stranded, action-oriented approach to achieving many of the Government’s key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

The Action Plan comprises of 5 key pillars which are addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- Addressing the unacceptable level of households, particularly families, in emergency accommodation.
- Moderating rental and purchase price inflation, particularly in urban areas.
- Addressing a growing affordability gap for many households wishing to purchase their own homes.
- Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty.
- Ensuring housing’s contribution to the national economy is steady and supportive of sustainable economic growth; and
- Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.

The return of the existing zoning for the subject lands to provide for residential development, on lands that are contiguous to existing residential schemes will help the Government to achieve the objectives of the Housing Action Plan. Thus, it is submitted that the proposal is consistent with the policy in this regard.

5.2 Regional Planning Context

Eastern and Midlands Regional Spatial and Economic Strategy (2019)

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies.

RPO 4.1 states:

“In preparing Core Strategies for development Plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the draft RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region”.

RPO 4.2 states:

“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded”.

It is submitted that the subject lands, which our client is seeking to have returned to a ‘New Residential’ zoning, has previously been granted permission for a housing scheme, but unfortunately that permission was not implemented as a result of the economic recession that took place at the time. It is also noted that the lands are currently zoned for residential use under the existing County Development Plan and our client has already engaged in Section 247 pre-planning discussions with Offaly County Council and submitted a Pre-Connection Enquiry to Irish Water for confirmation of feasibility for water services. In this regard, the preparation of a final planning application is well advanced for the lands but unfortunately has experienced delays due to the Covid-19 pandemic.

The lands are contiguous to the existing built up area of Crinkle, adjacent to a school and has direct road frontage onto two roads and can connect to all the necessary services and utilities, which are all located within proximity of the lands.

5.3 Local Planning Context

Offaly County Development Plan 2014-2020

The subject site is zoned ‘Residential’ under the current Offaly County Development Plan 2014-2020. Residential use is the primary land use of this zone. The objective of the land use zoning as stated in the Offaly County Development Plan 2014-2020 states:

“The use ‘Residential’ shall be taken to primarily include the use of land for domestic dwellings (including group housing for members of the travelling community), convents and civic institutions. It may also provide for a range of other uses particularly those that have the potential to foster the

development of new residential communities for example, schools, crèches, local convenience store, doctor/dental surgeries, open space (formal and informal) etc.”

The general objectives for primarily residential areas in Ireland are to provide a measure of protection from unsuitable new development or certain ‘bad neighbour’ developments that would be incompatible with the overall residential function of the area.

Offaly County Council as one of its many objectives states that it strives to implement national housing policy, to ensure that every household that needs it has access to quality, affordable housing in an acceptable environment. Individual housing needs are met through a number of different schemes and initiatives.

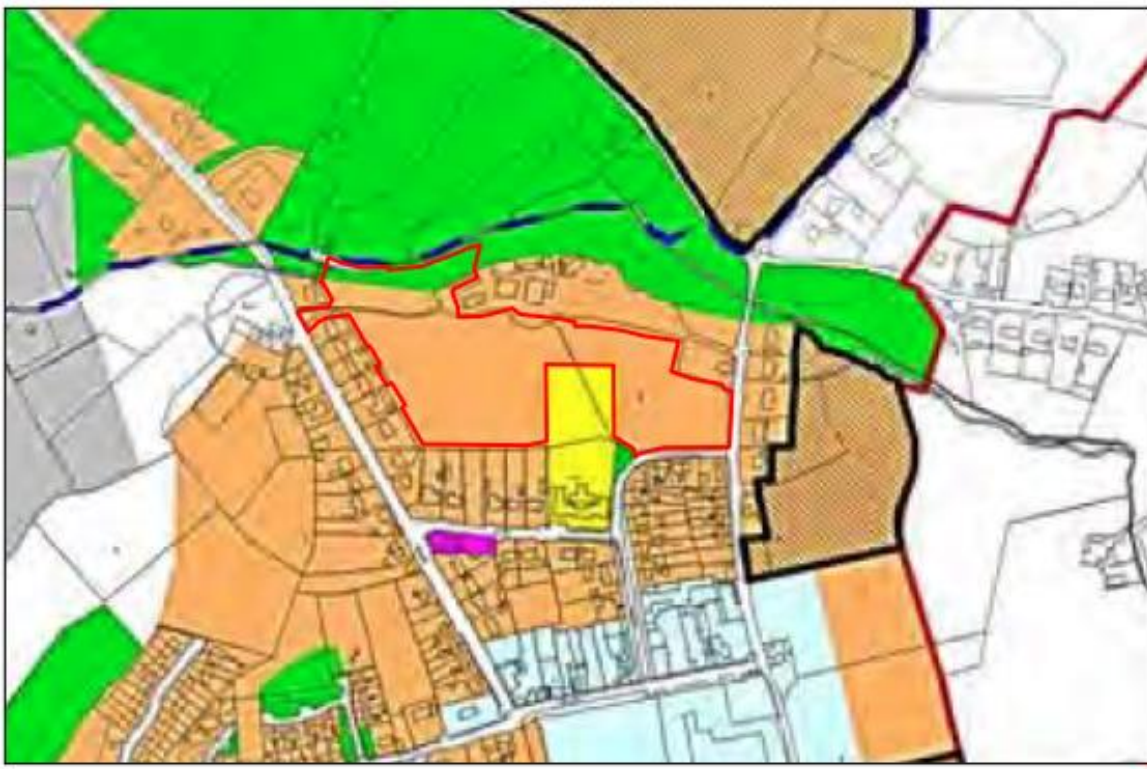


Figure 2. Existing Zoning Map from 2014 Development Plan (site outlined in red)

Draft Land Use Zoning (Draft Offaly County Development Plan 2021-2027)

“Strategic Residential Reserve”

Under the Draft Development Plan, approximately two-thirds of our client’s lands have been proposed to be rezoned to ‘Strategic Residential Reserve’ under the Draft Plan. However, our client is seeking to have the zoning on this portion of their lands returned to its current zoning under the existing Development Plan, i.e. to be zoned ‘New Residential’, in keeping with the remainder of their lands at Crinkle.

Under the Draft Development Plan, it is an objective of the Council to:

“Provide lands for development at some time in the future but it will not be considered for development purposes during the current plan period”.

The Draft Plan states that *“this categorisation includes lands which are not currently and not proposed to be sufficiently serviced to support development within the lifetime of this Plan. These lands are not developable within this plan period. The inclusion of Strategic Residential Reserve lands in this Plan will not in any way infer a prior commitment on the part of Offaly County Council regarding their future zoning in subsequent development plans. Such a decision will be considered within the framework of national and regional population targets applicable at that time, infrastructural services and the proper planning and sustainable development of the county, including environmental assessment requirements and compliance with the Flood Risk Management Guidelines”.*

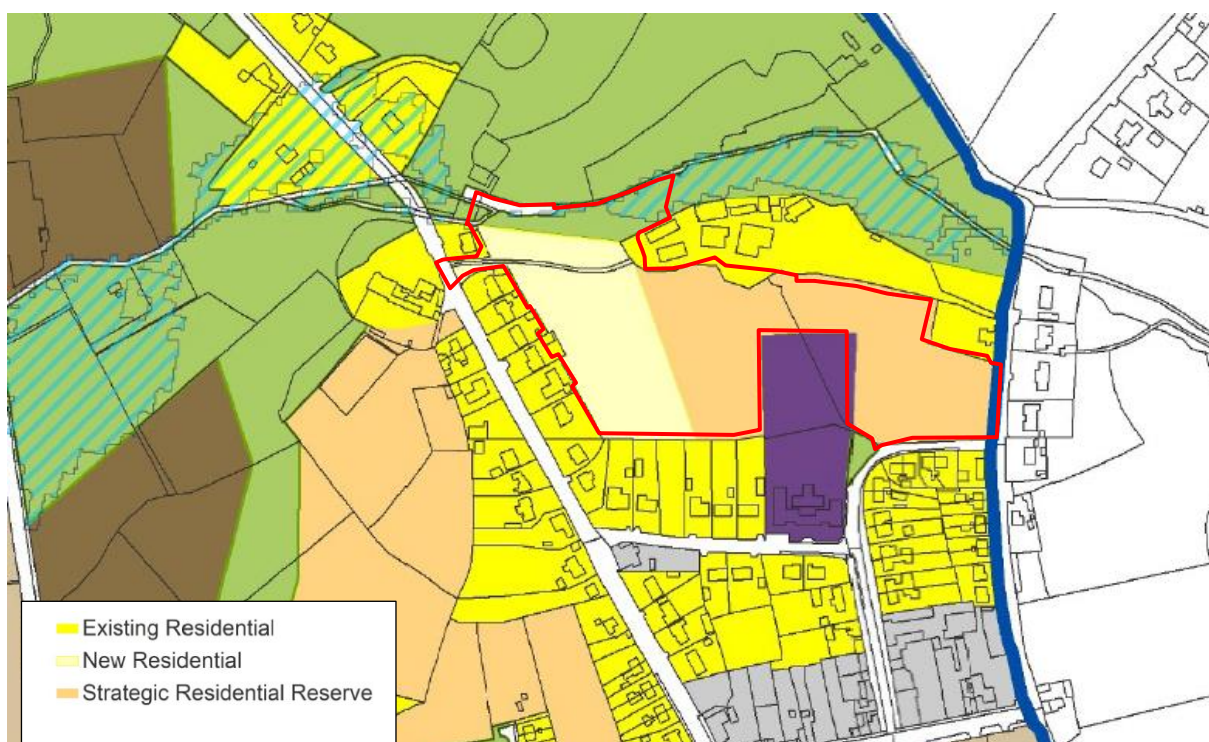


Figure 3. Land Use Zoning in the Draft Development Plan 2021-2027 (subject site outlined in red)

Core Strategy & Housing Policies and Objectives

Birr/Crinkill is identified in the Core Strategy as *“a sub-county market town that has significant employment and service functions relative to its regional and local catchment, has good regional transport links and has the capacity for continued commensurate growth to become more self-sustaining. It supports the regional driver role of Tullamore, and acts as an important local driver providing a range of functions for its resident population and its surrounding catchment including housing, employment, services, retail and leisure opportunities. The town should grow at a sustainable level appropriate to its position in the settlement hierarchy”.*

Policy SSP-08 of the Draft Plan states that *“It is Council policy that Birr, a Self-Sustaining Growth Town, continues to grow at a sustainable level and at a commensurate scale in accordance with the Core Strategy Table in an effort to become more self-sustaining”*.

It is respectfully submitted that the zoning of the entire Destrina lands as ‘New Residential’ will facilitate the growth of Birr/Crinkle in a sustainable and commensurate level.

Policy HP-17 of the Draft Plan states *“It is Council policy to encourage the compact growth of settlements; to promote healthy place-making; to increase the liveability factor of a place; to encourage the most efficient use of land; to ensure a mixture of residential unit types that are designed and constructed on the principles of universal design, life-long adaptability and energy efficiency; to support permeability and sustainable mobility with priority for pedestrians and cyclists; and in general to support the transition to a low carbon economy by way of reduction of greenhouse gases”*.

In this regard, the subject lands are surrounded by existing housing and are in the centre of Crinkle. The development of the lands for housing purposes would facilitate compact growth of Crinkle and provide modern housing, including social and/or affordable houses. The proposed future development of the subject lands would be designed in a permeable manner in line with the vision set out for the site under the existing Development Plan, which designated it as an Opportunity site.

6.0 Justification and Grounds of Rezoning Submission

This planning submission proposes to have the lands identified as ‘Strategic Residential reserve’ rezoned back to ‘New Residential’, which is in keeping with the remainder of the Destrina lands at Military Road and also in keeping with that of the zoning under the current County Development Plan.

Downey Planning have set out in Section 5 of this report how the proposed rezoning of the subject lands would be consistent with national, regional and local planning policy. Notwithstanding this, Downey Planning shall now set out further justification regarding the grounds of this rezoning submission.

6.1 Serviceability of the lands

The basis of the Council’s proposal to rezone approximately two-thirds of our client’s lands to ‘strategic residential reserve’ is that they believe that they are not proposed to be sufficiently serviced within the lifetime of the Development Plan. However, our client’s consultant engineers (Pinnacle) have engaged with Offaly County Council and Irish Water in relation to connecting the lands to the foul water network and an outfall connection is available on Military Road on the western side of the site. This also happens to be the lowest part of the lands and so would not require pumping. This enables the lands to be connected directly to the Crinkle station at the N62 road. Thus, the entirety of the lands can be serviced and thus do not need to be zoned as a ‘strategic residential reserve’.

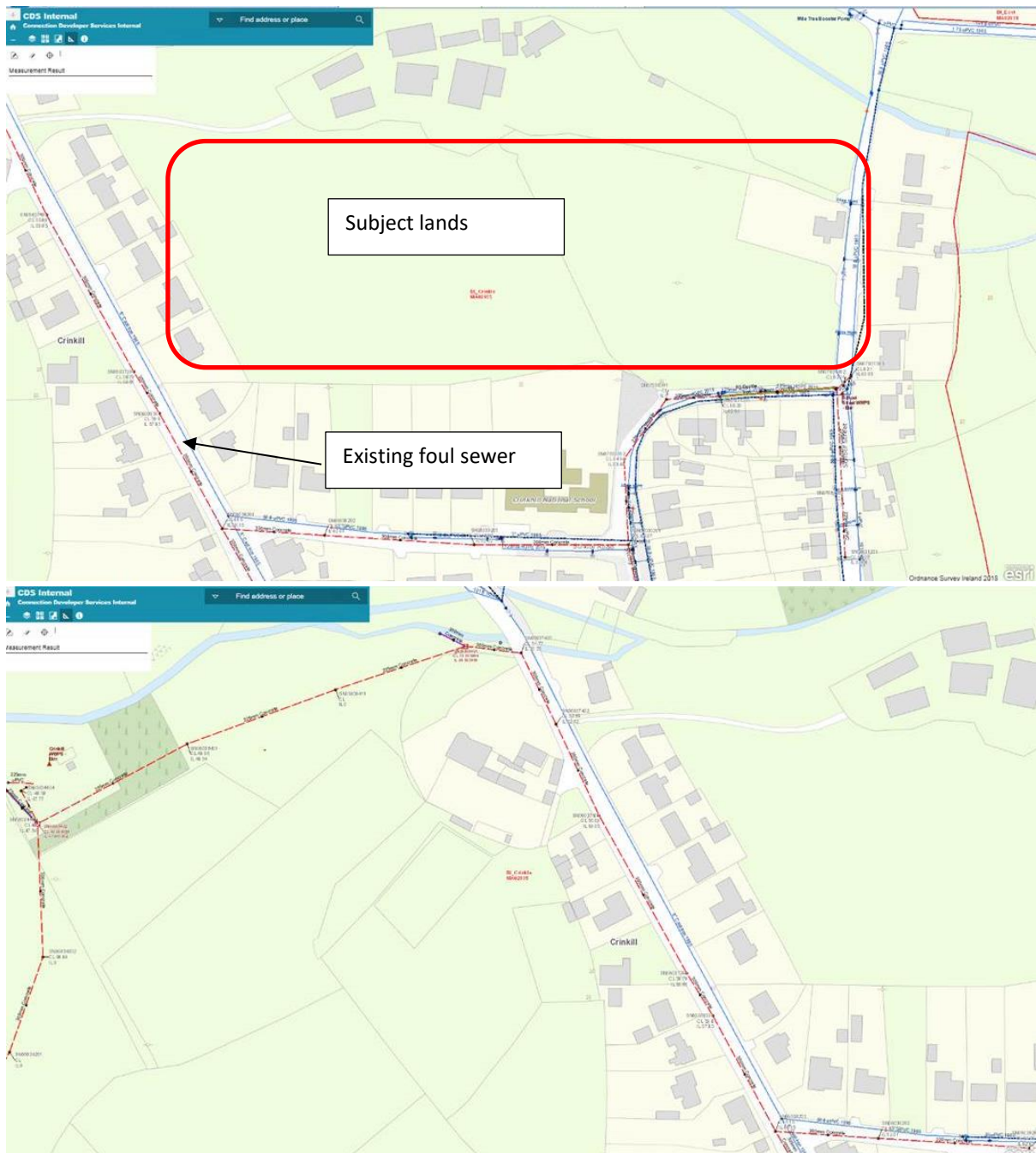


Figure 4. Extract from water services map showing proximity of foul sewer to subject lands

6.2 Failure of Previous Core Strategy to Deliver Required Housing

It is generally considered to be universally accepted that the economic recession that we experienced between the period 2008-2015, with a significant slowdown in growth and housing output from as far back as 2006/2007, that the previous housing allocation figures set out in the Core Strategy of the Offaly County Development Plan 2014-2020 were not met. It is noted that there is significant pent-up demand for housing in the area, including a large number of people on the Council's housing list as well as on the Housing Assistance Payment Scheme (HAPS). In this regard, it is critical that sufficient lands are zoned for residential purposes under the new Development Plan. While lands can be zoned, it is not a guarantee that they will be brought forward for development and thus the Core strategy needs to ensure that there more than sufficient headroom catered for.

In this regard, while other lands may be zoned for residential use under the current and draft Development Plan, the vast majority of these lands have not and will not be developed during the lifetime of the Plan due to various reasons including infrastructural constraints, financial constraints, inability or unwillingness of landowners to develop lands and also environmental considerations. However, in this case, there is a sizeable quantum of lands that extend to approximately 4.68 hectares that are owned by a known and proven developer/house builder and the subject site is a 'ready-to-go' site with all the necessary infrastructure available to the site. The rezoning of these lands will help to meet some of the published shortfall in the housing output in the County and Destrina Ltd have already commenced the planning process for the lands with Section 247 pre-planning consultation having been completed and the Pre-Connection Enquiry submitted to Irish Water. It is the intention of Destrina to finalise and submit a planning application at the earliest opportunity, noting that it's lodgement has been delayed due to the Covid-19 pandemic.

6.3 Integration with the wider Crinkle area

The existing Development Plan identifies the entire site for 'new residential' development and set out a number of design guidance, such as access locations, scale and height of buildings etc. The delivery of a housing scheme across the entire site was fundamental to this as it provided accessibility to both Military Road and School site to the west and east of the site respectively. However, by designating approximately two-thirds of the site as 'strategic residential reserve', such permeability and connections to the wider area cannot be achieved. This could result in a more typical suburban housing estate style of development as opposed to a more permeable layout in accordance with Objective DMS-03 of the Draft Development Plan as well as a more limited mix of house types, which would not be consistent with Objective DMS-05 of the Draft Development Plan.

6.4 Delivery of Affordable Housing

As stated previously, Destrina are a known and proven developer who can and will deliver much needed housing on the subject lands, pending a grant of planning permission. They have already entered negotiations with an Approved Housing Body for a number of housing units on the subject lands, which is on the basis of the entire lands being zoned and available for residential development. The Council's proposal to rezone most of the site to 'strategic residential reserve' will potentially prevent the delivery of housing from being achieved. This would be a significant blow not only to our client, but also to the large number of people and families on the Council's housing list.

6.5 Density Projections

Downey Planning would have serious concern in relation to the density projections that are being sought within the Core Strategy of the Draft Development Plan. In this regard densities of c. 30 units/hectare or more cannot be achieved throughout the plan area. While the rationale for achieving higher densities is noted and is supported in a general sense at national planning level, it should not be strictly enforced outside of the larger city and town centre locations where market conditions need to be considered.

There needs to be sufficient flexibility provided to enable a range of housing types be developed that are commensurate with the local environment. The densities proposed are being taken from a national perspective, but it is understood and indeed has been highlighted by the Government at the

latest CIF conference in October 2020 that they are reviewing the NPF to provide more flexibility in density standards at a regional/local level.

In this regard, it is respectfully submitted that by providing higher density targets, such as 30 units/hectare for much of the lands in the County, this makes these lands less attractive for development purposes and thus negates the ability of the Planning Authority to achieve their housing allocation targets within the Core Strategy. As a result, the Council must review the quantum of lands zoned as 'strategic residential reserve' and rezone parts of them to 'new residential' and it is respectfully suggested that our client's land be rezoned accordingly.

7.0 Conclusion

This submission has been prepared by Downey Planning on behalf of our client, Destrina Ltd., Marine House, Clanwilliam Court, Dublin 2, wish to make this submission to Offaly County Council regarding the Draft Offaly County Development Plan 2021-2027.

Our client owns approximately 4.68 hectares of lands at Military Road, Crinkle, Birr, Co. Offaly. Approximately two-thirds of these lands have been proposed to be rezoned to 'Strategic Reserve' under the Draft Plan. However, our client is seeking to have this portion of their lands zoned as 'New Residential', in keeping with the remainder of their lands at Crinkle.

Section 5 of this submission has identified that the rezoning of the lands to residential use is in accordance with national, regional and local planning policy. Furthermore, the rezoning of the subject lands is justified on the following grounds:

- Our client, who is an experienced developer and house builder, has engaged in Section 247 pre-planning consultation with the Planning Authority regarding a proposed residential development on the subject lands and has submitted a Pre-Connection Enquiry to Irish Water for this proposed development.
- Should the lands be zoned as a 'Strategic Reserve' then it would prevent much needed family homes being delivered in the area, including those for social and/or affordable housing. The delivery of family homes will help to sustain essential services and retail/commercial outlets in the area.
- The Core Strategy has based the quantum of zoned land required on an inappropriately high-density rate throughout the County as opposed to taking a variation in density levels, which are more achievable. It is our understanding that the Government are to review the NPF to facilitate lower density levels in smaller areas in order to ensure the delivery of housing.
- The zoning of the entire Destrina Lands as 'New Residential' is in accordance with the policies and objectives of the Development Plan and national and regional planning policies such as the NPF and RSES.

In light of this, Downey Planning respectfully request that Offaly County Council amend the Draft Offaly County Development Plan 2021-2027 by changing the zoning objective for the subject lands from "strategic residential reserve" to "new residential".