

Planning Department
Offaly County Council
Áras an Chontae
Charleville Road
Tullamore
Co. Offaly

Wednesday 7th October 2020

RE: SUBMISSION IN RESPECT OF LANDS AT SEEFIN, BIRR, CO. OFFALY ASSOCIATED WITH THE DRAFT OFFALY DEVELOPMENT PLAN, 2021-2027

1.0 INTRODUCTION

James Grennan Studio's has prepared this submission on behalf ECAN Ltd., Cormac Loughnane and Eoin Garry in respect of the *Draft Offaly County Development Plan, 2021-2027*, (herein referred to as the Draft Development Plan).

Our Clients are the owners of a c.4.5ha land parcel located in the townland of Seefin (see Figure 1.0). The purpose of the submission is to request that the land use zoning of this land parcel be changed from 'Strategic Residential Reserve', as is currently proposed in the Draft Development Plan to 'New Residential'.

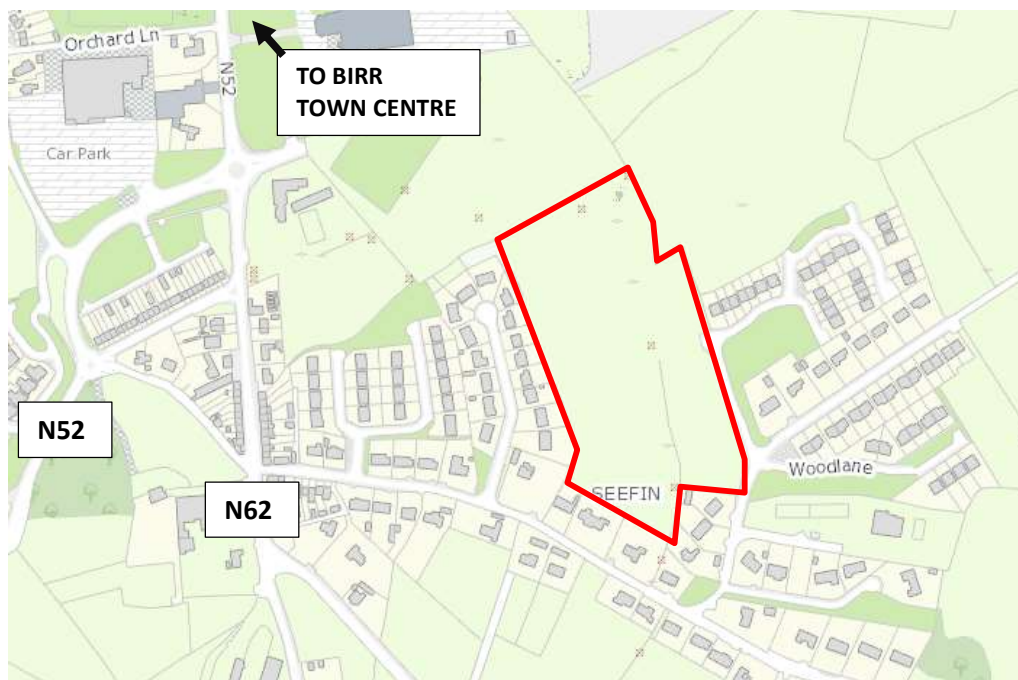


Figure 1.0: Site Location Map, Indicative Outline of Subject Lands Highlighted in Red (Source: www.myplan.ie, 2020)

The relevant planning policy document currently applicable to the subject lands is the Birr Town and Environs Development Plan 2010-2016 (Extended until 2020). Under this Development Plan,

the subject lands are designated with a 'Residential' land use zoning, the objective of which is to "primarily include the use of land for domestic dwellings". The current Birr Development Plan further characterises the subject lands as 'backland/infill' in nature owing to their being bound by existing residential development. It is hoped that the new Offaly County Development Plan will continue to provide a positive environment in which to develop this strategically located site. As referenced in the current Birr Development Plan, the development of the subject lands (together with lands zoned for residential uses to the north) would also 'complete' this segment of the town and thus enhance connections through the town for both future and existing residents.

2.0 SITE DESCRIPTION AND CONTEXT

The subject lands are currently greenfield in character and bounded to the south, west and east by existing established residential developments including the Hillside estate to the west and the Corr na Meala estate to the east. To the north, the subject lands are adjoined by agricultural lands to the North.



Figure 2.0: Aerial View of Subject Lands Indicative Outline in Red (Source: www.bingmaps.com).

Access to the subject lands is provided to the south from Woodlane and to the north through adjoining agricultural lands. Major routes proximate to the site are the N62 and N52 located to the west. A roundabout junction located to the north west connects these two national routes. The eastern arm of this roundabout also ensures that provision is made for the future Birr

Distributor Route which is proposed to extend eastwards and will run directly to the north of the subject lands.

The subject lands are located approximately 900m to the south east of Birr town centre where a multitude of services and facilities are located. Notable uses within the immediate vicinity of the subject site include the County Arms Hotel, Tesco supermarket, St Brendan’s GAA park and Birr Further Education and Training Centre which are all located to the north west of the subject lands and accessed primarily from the N62 Road.

In addition, it is understood that the design of a Primary Care Centre, to be located in the lands immediately adjoining the site to the north, is at an advanced stage and will shortly be submitted for planning approval. It is thus evident that the subject lands are in a strategic location proximate to a diverse range of services and facilities. Furthermore, the lands represent a critical link between the established residential areas to the south and the town core to the north.

2.1 Current Planning Context

As referenced in Section 1.0, the current relevant planning policy document pertaining to the subject lands is the Birr Town and Environs Development Plan 2010-2016. Under that document, the subject lands are designated with a ‘Residential’ land use zoning objective with an additional portion to the north zoned ‘Open Space’ (see Figure 3.0). Additional relevant provisions include the proposed ‘Town Distributor Route’ located immediately to the north of the subject lands. This proposed route includes a proposed roundabout which would provide direct access to the subject lands and to the existing residential areas further to the south.

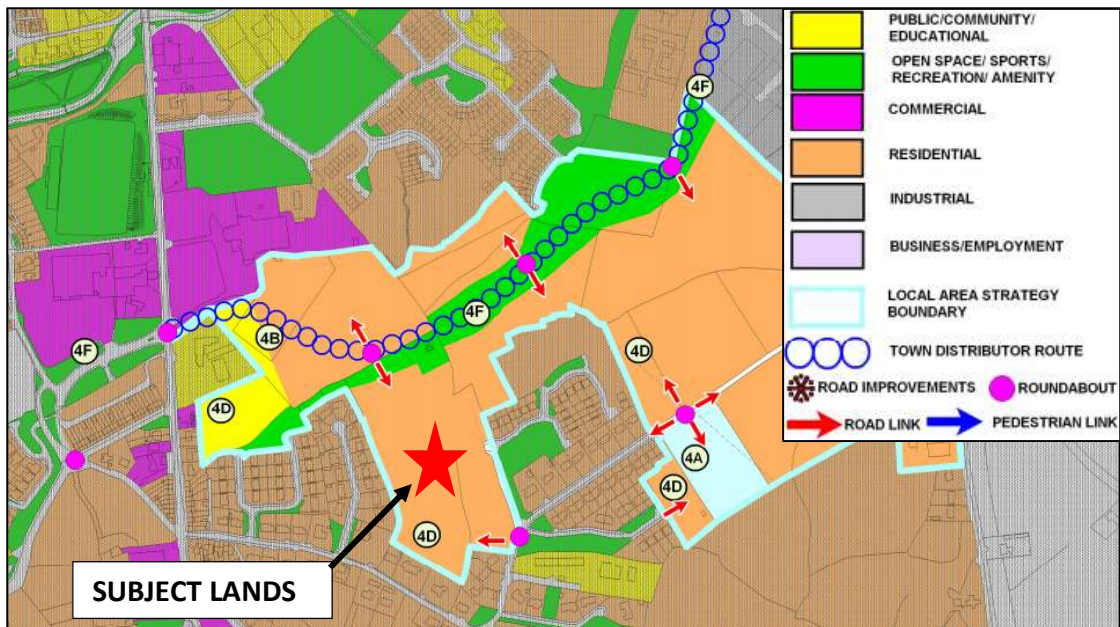


Figure 3.0: South East Quadrant Local Area Strategy Land Parcel 4 Map (Source: Birr Town and Environs Development Plan 2010-2016).

The subject lands are also located within the boundaries of a designated ‘Local Area Strategy’ zone- the ‘South East Quadrant’. The Birr Development Plan notes the potential for this area to

deliver residential and ancillary residential uses and thus *'complete'* this segment of the town. The current zoning designations for the subject lands and adjoining lands to the north and north east reflects a cohesive strategy for the area which ensures that connection improvements arising from the delivery of the Town Distributor Road will be maximised for the benefit of future and existing residents in the area.

3.0 DRAFT DEVELOPMENT PLAN

The Draft Offaly County Development Plan 2021-2027 which will supersede the current Birr Development Plan when adopted proposes that the subject lands be rezoned from *'Residential'* to *'Strategic Residential Reserve'*. As evidenced in Figure 4.0 below, zoning designations for adjoining lands are unchanged from the current Birr Development Plan and as such continue to provide for *'New Residential'* land uses and for a *'Distributor Road'* on the lands to the north.

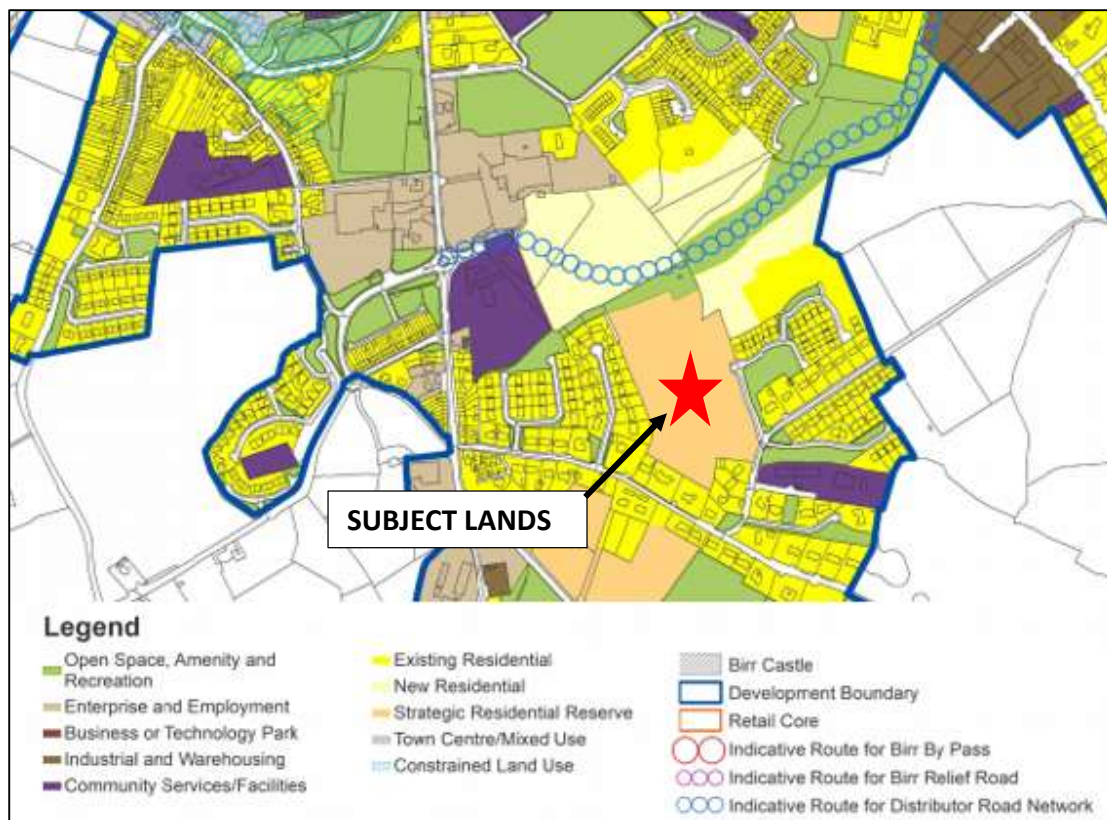


Figure 4.0: Birr Town Zoning Map (Source: Draft Offaly County Development Plan 2021-2027)

The Draft Development Plan states that the objective of the *'Strategic Residential Reserve'* zoning designation is 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"*. Section 12.4.4 of the Draft Development Plan further 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"*.

It is submitted that the above referenced 'Strategic Residential Reserve' is not an appropriate zoning designation for the subject lands as they are currently well-serviced and would represent infill of the existing urban area of Birr. The development of the subject lands within the 2021-2027 Development Plan period would not result in the type of scattered development or 'leap-frogging' which the Draft Development Plan seeks to avoid but rather would consolidate the Birr Town.

3.1 Proposed Amendment

As outlined above, we consider the 'Strategic Residential Reserve' zoning designation to be unsuitable for the subject lands and thus propose that they be rezoned 'New Residential'. This proposal would facilitate the immediate development of these strategically located lands and would maximise the efficiencies of current and proposed services infrastructure.

Arguments in support of this amendment and evidence demonstrating that it would be in full accordance with the proper planning and sustainable development of the area are outlined in the sections below.

3.2 Arguments in Support of Proposed Amendment

3.2.1 Consolidation of the Town – Compact Urban Area

The proposed rezoning of the subject lands to 'New Residential' would allow for the bridging of a large existing residential area to the south with the established town core to the north thus serving to integrate the town's existing development and creating a consolidated and cohesive urban area. Such consolidation of the urban area is fully supported by Strategic Objective Item (II) of the Draft Development Plan:

"Consolidate settlements by avoiding undesirable and inefficient sprawl. This will be achieved through targeting a significant proportion of future development on infill/ brownfield/ underutilised sites within the existing built-up footprint of all settlements in accordance with the principle of Compact Growth set out in the National Planning Framework."

The subject lands owing to their location within the current built up area of Birr are already well serviced and could easily be brought forward for development in an efficient and timely manner. The development of the subject lands would thus ensure the efficient use of well serviced land in accordance with Strategic Objective Items (IX) and (XI) of the Draft Development Plan which state:

"Make more efficient use of key resources such as land, water, energy, waste and transportation infrastructure."

"Achieve transition to a competitive, low carbon, climate resilient and environmentally sustainable economy. This should be facilitated through reducing the need to travel, by integrating land use and sustainable modes of transport, and by reducing the use of

nonrenewable resources. In line with this, promote active and healthy lifestyles through increased opportunities for walking, cycling and active sport recreation.”

The area surrounding the subject lands is currently well served by a strong network of community facilities including shops, education centres and recreational amenities. The proposed Primary Care Centre immediately to the north of the subject lands will further contribute to this strong network. Any proposed development on the subject lands would thus contribute to the vitality of existing facilities and amenities in the area and also provide additional amenities in the form of open space. As such, this would be in accordance with Strategic Objective Item (XII) of the Draft Development Plan which states:

“Encourage inclusive and active sustainable communities based around a strong network of community facilities and amenities.”

The rezoning of the subject lands for ‘New Residential’ uses would provide for additional housing within the town boundaries and integrate currently disconnected built up areas within the town and is thus fully in accordance with the overarching objectives of both the National Planning Framework and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. These strategic planning policy documents both seek to direct future development into existing urban areas in order to ensure that they are strengthened and in order to ensure that future development is well served in terms of infrastructure.

The subject lands have the potential to facilitate high quality housing at a scale appropriate for their strategic location and thus are fully in accordance with Strategic Objective Item (VII) of the Draft Development Plan which states:

“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.”

Furthermore, the proposed rezoning would also be fully in accordance with the overarching objectives of both the National Planning Framework and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region which both seek to direct future development into existing urban areas in order to ensure that they are strengthened and in order to ensure that future development is well served in terms of infrastructure.

An indicative layout of the type of proposal that could be brought forward for development is outlined below. (See Appendix Drawing ; **2015-S003**) This proposal demonstrates the potential for the subject lands to bridge existing residential areas with the town to the north. The indicative layout also highlights the benefits in terms of permeability of developing the subject lands as their development would facilitate the integration of pedestrian and road networks.

3.2.3 Improving Permeability and Encouraging Sustainable Transport

As referenced in earlier sections of this submission, the proposed rezoning of the subject lands to facilitate residential development on them within the near future would connect existing residential areas to the south with the core of the town to the north. Connections between these built up areas are at present poor relying wholly on narrow roads such as Marian Terrace which

are not appropriate for vulnerable road users (see Figure 5.0). The future development of the subject lands would result in increased high quality connectivity between these areas and throughout the town as a whole by enabling access to the proposed distributor road to the north of the subject lands.



Figure 5.0: Junction of Marian Terrace and N62 which provides the primary connection between existing development to the south and the town centre (Source: www.googlemaps.com)

The future development on the subject lands themselves would be located less than 1km from the core of the town and within close proximity to a range of employment hubs, services and facilities. As such, rezoning of the subject lands would facilitate more sustainable travel modes such as walking and cycling in the future. Future development of the subject lands would also ensure that the benefits of a proposed distributor road to the north are fully maximised. Such improvements would fully accord with Strategic Objective Item (IV) of the Draft Development Plan which states:

“Reduce car dependency, and increase the use of sustainable mobility such as walking, cycling and public transport through planning for and encouraging integrated transportation and landuse.”

3.2.4 Housing Strategy / Population Projections

It is acknowledged that the Core Strategy of the Draft Development Plan outlines a detailed rationale justifying the current quantum of land zoned for residential uses across the county. However, it is understood that the population projections outlined in the Core Strategy Table (Table 2.2) are informed by wider NPF targets for the state and Regional RSES targets for the Eastern and Midland Region.

However, it is imperative to clarify that the population growth projections highlighted at national and regional level are not intended to be a limitation on such growth but rather a minimum target to provide for growth. The policies and objectives of the draft Development Plan must have regard to this going forward and plan accordingly to provide for an adequacy of suitably located, zoned residential land that is accessible, serviced and readily available for and capable of development.

Furthermore the rezoning of the subject lands for residential development will provide further scope for the development of Social and Affordable housing within the plan area which is critically required at present.

3.2.5 Enhanced Open Space Amenity

The northern portion of the subject lands are zoned for open space. It is submitted that the zoning of the subject lands to deliver residential uses to the south will ensure that this open space will benefit from passive surveillance thereby improving the safety of the area for members of the general public and ensuring that this area of open space will be readily accessible to existing residents to the south who, were development of the subject lands not to be feasible, would be restricted from accessing this open space.

3.2.6 Agricultural Island

Were the lands to be zoned as a 'Strategic Residential Reserve', they would continue to be used for agricultural purposes and would in effect be an agricultural island surrounded by urban land uses. Side effects of such a use include the necessity for large agricultural machinery to utilise residential streets and the potential for negative noise and odour impacts arising from necessary agricultural practices being carried out on the lands.

The rezoning of the subject lands to 'New Residential' would ensure that a more appropriate land use could be developed on the site within the lifetime of the 2021-2027 Development Plan which would not negatively impact upon the amenity of existing residents in the area. Indeed, it is submitted that the provision of a high quality landscaped residential scheme on the subject lands would lead to visual impact improvements and permeability/access improvements.

3.2.7 Large Development Parcel

It should be noted that there are a significant amount of lands to the north of the subject site which is currently zoned for residential uses and is proposed as 'new residential' under the Draft Development Plan. As acknowledged by the current designation of the subject lands and adjoining undeveloped lands as a 'Local Area Strategy Land Parcel No. 4', the consideration of large areas for development can ensure that a more cohesive approach can be taken which facilitates the delivery of infrastructure improvements in tandem with residential developments.

This is considered to be of significant relevance given that the size of development land parcels is proven to be a major factor in the ability of developers and investors to progress them for development. Equally importantly, smaller land parcels, when developed, typically yield little in


the way of substantial new amenities, facilities and social infrastructure for local communities given the development costs associated with the delivery of such amenities, facilities and infrastructure.

4.0 CONCLUSION

It is contended that, following a review of this submission, the subject lands currently proposed to be zoned "Strategic Residential Reserve" should be zoned as "New Residential" to ensure the development of the lands is in keeping with the proper planning and sustainable development of the area. The designation of this strategic site near the Town Centre for residential development will promote the development of a compact and permeable urban area.

Birr must be promoted as a coherent and self-sustaining urban centre in accordance with both local and national planning policy. Through the rezoning of the subject lands for residential uses, connections in the surrounding area will be enhanced, well serviced lands will be efficiently used and the vibrancy and vitality of the existing residential community will be strengthened.

It is requested that the Planning Authority will take the above into consideration when preparing the *Offaly County Development Plan 2021-2027*. If you have any queries or comments with regard to this submission, we would be happy to discuss this matter further or provide the Council with any information that may be required.

SIGNED :  _____ 07/10/2020
James Grennan B.Arch



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SITE LAYOUT PLAN
SCALE 1 : 1,500 @ A3

SITE AREA ; 4.34Ha
PUBLIC OPEN SPACE ; 0.85Ha (19.5%)
108 HOUSING UNITS

No.: Date: By: Revision:

Figured dimensions only to be taken from this drawing. All dimensions to be checked on site. Architects to be informed immediately of any discrepancies before work commences on site.

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Project: HOUSING DEVELOPMENT AT SEEFIN

Site: SEEFIN, BIRR, CO.OFFALY

Client: ECAN LTD

Title: SITE LAYOUT PLAN

Drwg. No.: 2015 - S003

Rev:

Date: 28.09.2020

Scale: 1:1,500

Drawn by: JG

Checked: --

SKETCH OPTION 1

A3