



**SIMON CLEAR & ASSOCIATES
PLANNING AND DEVELOPMENT
CONSULTANTS**

Forward Planning Section,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore,
County Offaly

7th October 2020.

Re:- Lands at Cappincur, Daingean Road, Tullamore, Co. Offaly

On behalf of Midland Town and Country Stores Limited, owner of lands at Cappincur, I wish to make a submission in relation to the Draft Offaly County Development Plan 2021 – 2027. The entire landholding is outlined in red below.

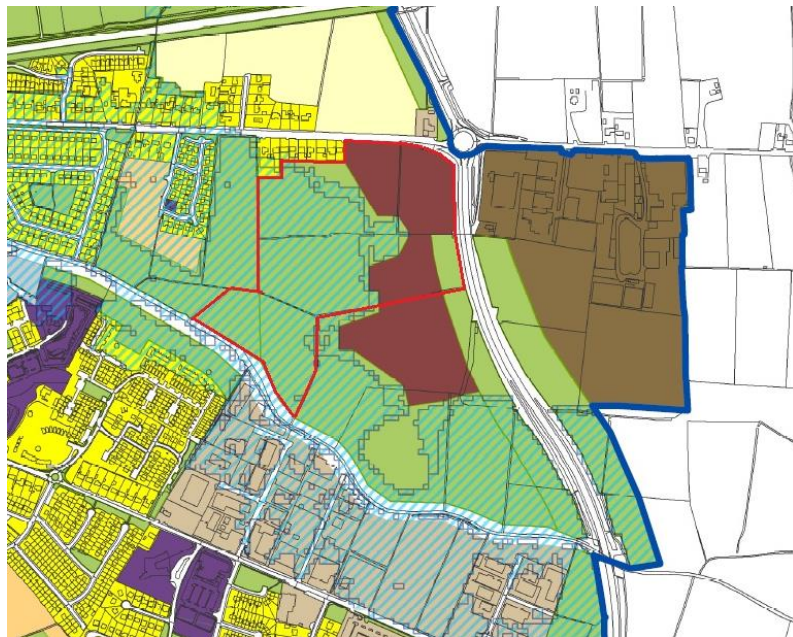


Figure 1: Draft Tullamore Town Plan Zoning Map with Landholding Outlined in Red



Simon Clear B.A. Dip. T.P. MIPI
Darran Quaille B.A. MRUP MSc BLUP MIPI
Paula Shannon B.A. MRUP MIPI

3 TERENURE ROAD WEST,
TERENURE,
DUBLIN 6W
D6W YY79,
IRELAND.

Phone: 00-353-1-492 5934
Fax: 00-353-1-492 7617
E-mail: admin@clearconsult.ie
Web: www.clearconsult.ie
Vat No. 9803199H

However, this submission refers to the part of those lands zoned for Business and Technology (BT) in the Draft Tullamore Town zoning map extract shown below (the subject lands).

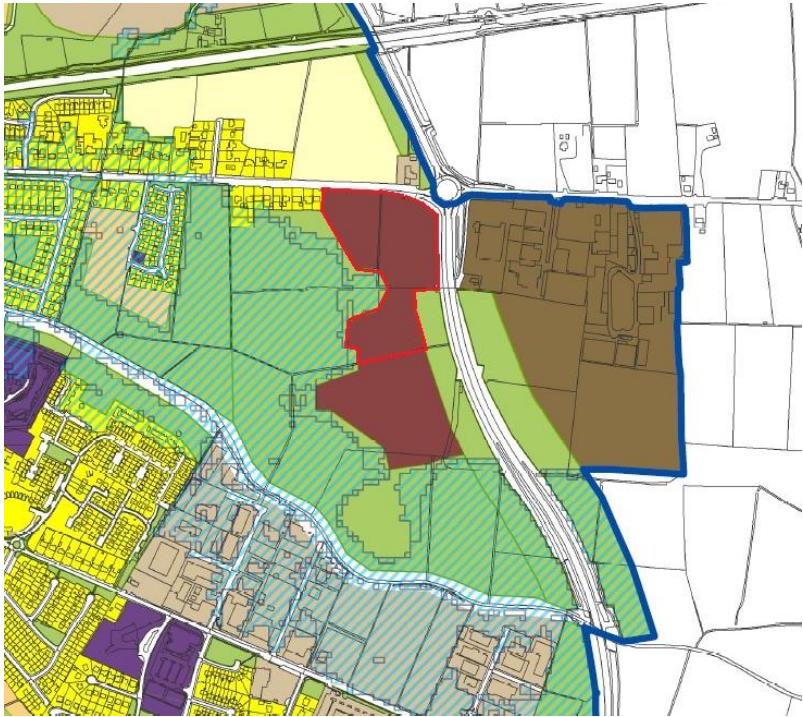


Figure 2: Draft Tullamore 2021-2027 Zoning Map with Relevant Lands Outlined in Red

The subject lands carry a zoning objective for industrial development in the current development plan and have the benefit of planning permission for the construction of a country store, initially granted in 2011 (PL2/11/47) and provided with an extension of duration to July 2021 by Offaly County Council. Recently, permission was granted for modification to this permission, for a T-junction access (Ref. 20/21), which made putting the permission into effect possible.

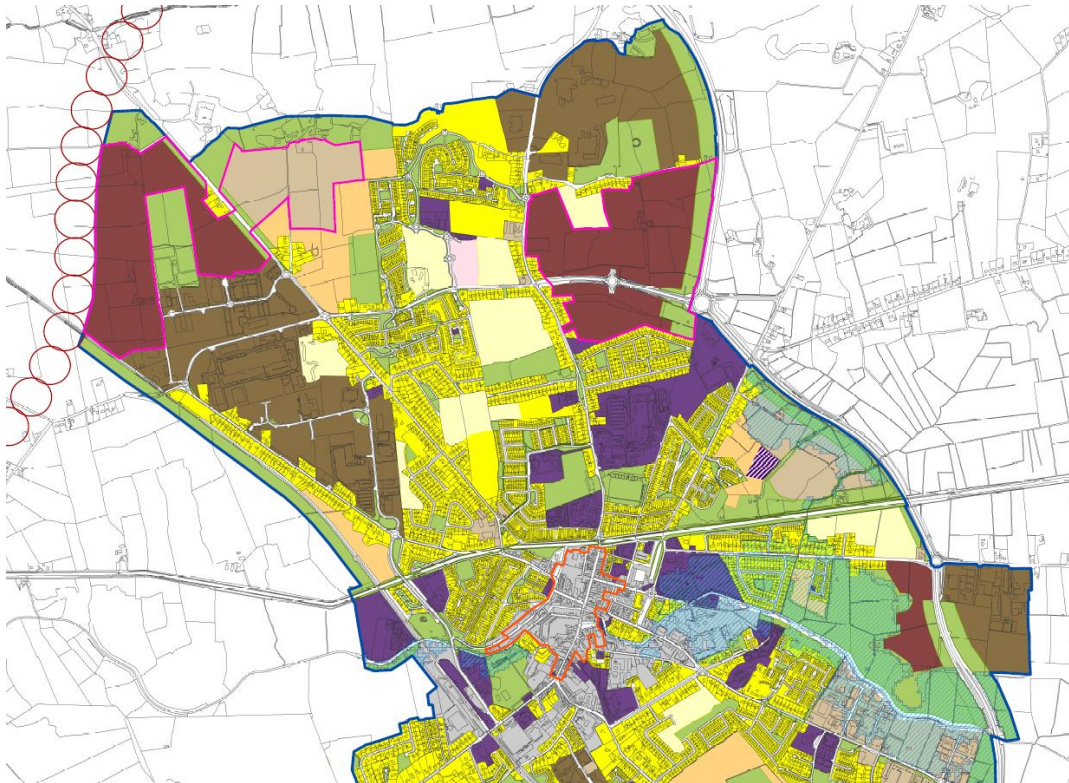
In the current circumstances it may not be possible to complete development before the time limited end of duration of the current permission. When the extension of duration request was considered the permission was deemed to be consistent with the provisions of the current development plan. With a change of zoning from Industrial (I) to Business/Technology Park (BT), a renewal of the planning permission for the type of development previously approved would not be possible by reference to the land use matrix associated with the BT zoning.

In this submission it is requested that the existing zoning provision for Industrial be recategorised as EE to facilitate development that was acceptable under the current development plan. Compared to the BT zoning, the proposed EE zoning has a more extensive matrix of permissible and open for consideration land uses.

It is submitted that EE zoning would be more appropriate for the lands. EE promotes the development of employment uses that reinforce the EE function of the subject area as a whole and require high environmental and design standards, for uses including - R+D; light industry, retail warehousing; car showrooms; offices; enterprise and employment uses; within a high quality campus/park type development, subject to sequential testing in respect of retail developments and excluding waste management and heavy industrial uses.

BT promotes opportunities for technology based industry and advanced manufacturing; compatible office space; R+D employment within high quality, highly accessible, campus style settings, accommodating high end, high quality, value added business and corporate HQs, with an emphasis on high quality sustainable design and aesthetic, promoted to enhance corporate image and identity.

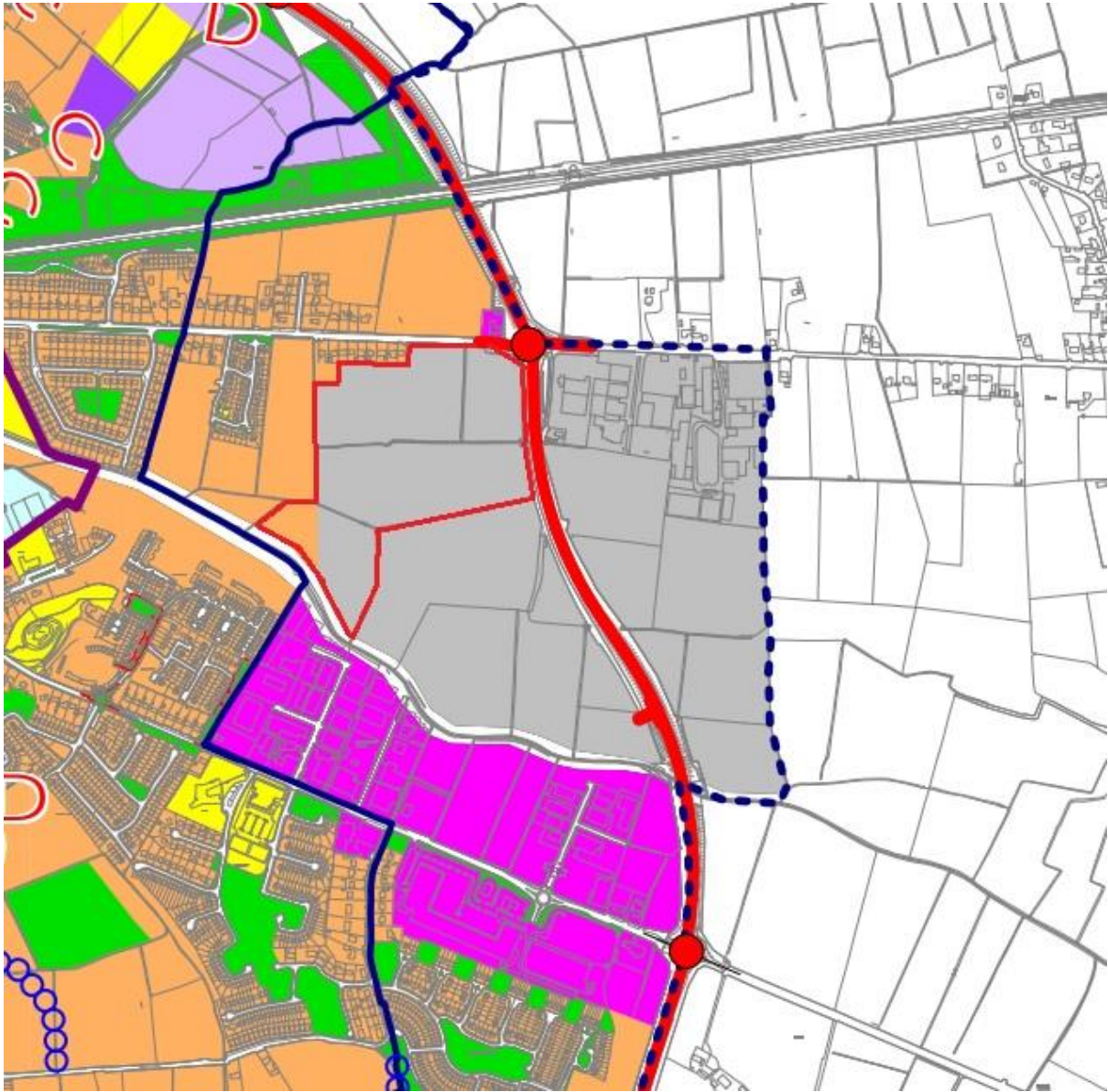
It can be seen that BT is a highly exclusive zoning, which would be typically occupied by IDA promoted FDI high-tech industry. There are two large, well accessed BT zonings located to the north of the town centre, which would be first priority targets for the exclusive and rare type of enterprise that would be attracted to Tullamore under the BT zoning.



Draft zoning map showing two large BT zones north of the town centre

It should be noted that: -

- While zoned BT, the subject lands are not identified as being a Strategic Employment Zone and therefore of a lower priority than other similarly zoned lands;
- EE zoning permits almost all of the uses permitted in BT zoning and desirable uses in high-quality developments would not be excluded by providing EE zoning;
- The lands that make up the proposed Cappincur BT zoning are in separate ownership and masterplanning a singular campus would be problematic;
- The likelihood of any suitable development of the Cappincur lands under BT zoning would be extremely remote under the provisions of the draft Development Plan;
- The area of land comprising the proposed BT zone has been significantly reduced in the draft plan from the previous industrial (I) zoning, as shown below. This is primarily due to considerations arising from the CFRAM. Therefore, the potential strategic value of the lands for BT purposes has been curtailed by lack of area.



Current industrial (I) zoning with subject lands outlined Red.

The industrial zoning in the previous Tullamore Town Development Plan covered a significant area of land, including the subject lands and extending to the east of the bypass road. The industrial zoning was one of two large areas zoned for this use which, if developed, would have the potential to significantly contribute to industrial development in the town.

The proposed zoning in the draft plan divides the lands west of the bypass into 2 different zoning objectives; Open Space, Amenity and Recreation; and Business/Technology.

Regional Considerations

In the RSES, Tullamore is a ‘key town’, which tier includes - *‘large economically active service and/or county towns that provide employment for their surrounding areas and with high quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.*

The draft plan refers to the main County Strategic Outcomes, which feed from three high level key principles listed in the RSES - namely Healthy Placemaking, Climate Action and Economic Opportunity: -

- Healthy Placemaking is focused on promoting people’s quality of life through the creation of healthy and attractive places to live, work, visit and study in;
- Climate Action recognises the need to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this;
- Economic Opportunity develops from creating the right conditions and opportunities for the county to realise sustained economic growth and employment that ensures good living standards for all.

The strategy in relation to Economic Opportunities is to: -

- Direct significant development into Tullamore Key Town;
- Locate Strategic Employment Zones in Tullamore;

The Midlands economy is currently challenged, with a requirement for focussed Government action in 2019¹ to set an agenda for improved economic performance going forward. It is submitted that the identification of two large strategic employment zones is sufficient in Tullamore for the foreseeable future.

Conclusion

The Cappincur lands are the least likely to be seen as strategic or attractive for corporate HQ type development and to zone them as proposed is to effectively sterilise them for decades.

¹ Just Transition Initiative, reforming the economy, including in Offaly, after ABP decisions on power stations including Shannonbridge.

There is a current permission for a well designed Town and Country Store designed and permitted to retail large and bulky goods suitable neither to town centre or retail park retail centres.

There is a recent grant of planning permission that makes the subject lands accessible and developable in the foreseeable future.

The objective of the development plan should be to foster development achievable in the foreseeable future, preferably within the term of the plan. Therefore, revision of the proposed BT to EE zoning is requested.

I trust that this submission will be taken into account and that the lands at Cappincur will be zoned EE in the development plan when adopted.

Yours sincerely,

Simon Clear.

Name and Address

Midland Town and Country Stores Limited,
67 Dublin Street,
Balbriggan,
Co. Dublin
K32 D235