

Submission to the
Draft Offaly County Development Plan 2021–2027
Specifically in Respect to Lands in Clara, Co. Offaly

October 2020

2-1055 RPT Clara Lands Draft CDP Submission v2.0



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On behalf of **Independent Trustee Company (ITC) (Delta 77)**

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1.0 Introduction

Future Analytics Consulting Ltd. (FAC), 23 Fitzwilliam Square (South), Dublin 2 (Chartered Planning Consultants), have been instructed by Independent Trustee Company (ITC) (Delta 77) of Harmony Court, Harmony Row, Dublin 2 to make this submission to Offaly County Council (OCC) in respect to the *Draft Offaly County Development Plan 2021–2027* (Draft Plan) and the zoning of approximately 2.8 ha of lands in Clara.

The Draft Plan has de-zoned the subject site (location shown in Figure 1.1-1.3 below), which is currently zoned 'Residential' in the extant *Offaly County Development Plan 2014–2020* (Current Plan). ITC (Delta 77) have serious concerns with regard to this de-zoning, which will prevent the timely delivery of much-needed housing in Clara and, therefore, request that the proposed *Offaly County Development Plan 2021–2027* makes provision for the following:

“Lands in Clara, lying between the R420 to the north and the Curragh Road to the south, to have their zoning designation amended to ‘New Residential’ in light of their appropriateness for residential development and to accord with the new residential zoning designations in the Offaly County Development Plan 2021–2027.”

ITC (Delta 77) are committed to the development of the subject site and are currently in the process of designing a residential development for construction thereon (Section 4.0). The de-zoning will prevent the proposition being realised; inhibiting the delivery of housing in the town.

1.1 Purpose of this Submission

The purpose and objective of this submission is to demonstrate to OCC the merit of retaining a residential land-use zoning designation – specifically 'New Residential' – on the subject site in the *Offaly County Development Plan 2021–2027* (currently at Draft Stage).

To justify the retention of a residential zoning on-site and to support the prospect of the development proposed above, a site comparison assessment has been conducted (Section 2) to demonstrate the appropriateness of zoning and developing the subject site for residential uses.

1.2 Subject Site

The subject site, which forms part of a wider landholding, is located in the north of the settlement of Clara in County Offaly and is approximately 2.8 ha in area (Figure 1.1). It is bound by the R420 to its north, the Curragh Road to its south, the L20157 to its east and undeveloped lands to its west (Figure 1.2). The subject site lies approximately 850 m or a 10-minute walk from Clara town centre and is proximate to well-established residential areas.

The subject site benefits from very good accessibility. It is situated within a few minutes' drive of the M6 motorway which provides connections to Galway (west) and Dublin (east). It is also located within proximity to Clara train station, which provides services to Dublin, Galway, Limerick and Mayo. Bus route numbers 73 (connecting Athlone and Waterford via Clara), 818 (connecting Athlone to Tullamore via Clara) and 840 (connecting Clara to Pullough) are also within an 8-minute walk of the subject site.



Figure 1.1: Site context map.



Figure 1.2: Aerial view with the indicative boundary of the subject site outlined in red.

The zoning of the subject site as 'Residential' in the Current Plan is illustrated in Figure 1.3.



Figure 1.3: The subject site as zoned 'Residential' in the Current Plan.

2.0 Site Comparison Assessment

The Draft Plan has zoned a total of 9 no. sites as either ‘New Residential’ or ‘Strategic Residential Reserve’, with their purposes being to facilitate the principal residential development in the town of Clara. The zoning changes between the Current and Draft Plans have resulted in the loss of the subject site’s ‘Residential’ zoning designation, with no zoning now applicable thereon. The subject site and above sites are marked on Figure 2.1 (overleaf) and summary details are set out in Table 2.1.

Table 2.1: Summary of subject site and residentially zoned lands in Clara, per the Draft OCDP.

Site	Area (ha)	Current Zoning	Proposed Zoning
Subject Site	2.80	Residential	Dezoned
1	0.14	Residential	New Residential
2	1.60	None	New Residential
3	1.50	None	New Residential
4	2.58	Residential	New Residential
5	2.00	Residential	New Residential
6	1.39	Residential	Strategic Residential Reserve
7	2.60	Residential	Strategic Residential Reserve
8	0.91	Residential	Strategic Residential Reserve
9	1.32	Residential	Strategic Residential Reserve
Total	16.83		

5 no. sites, with a combined area of approximately 7.82 ha, are now zoned as ‘New Residential’, with an objective (LUZO-04) to:

“Provide for new residential development and other services incidental to residential development.”

It should be noted that 2 no. of these sites (with a combined area of 3.10 ha) are not zoned in the Current Plan and will be coming forward with the prospect of residential development for the first time. By contrast, the subject site is primed for delivery, with historic planning applications (albeit refused) clear evidence of intentions to see the lands developed.

4 no. sites, with a combined area of approximately 6.22 ha, have now been rezoned as ‘Strategic Residential Reserve’, with an objective (LUZO-05) 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.”

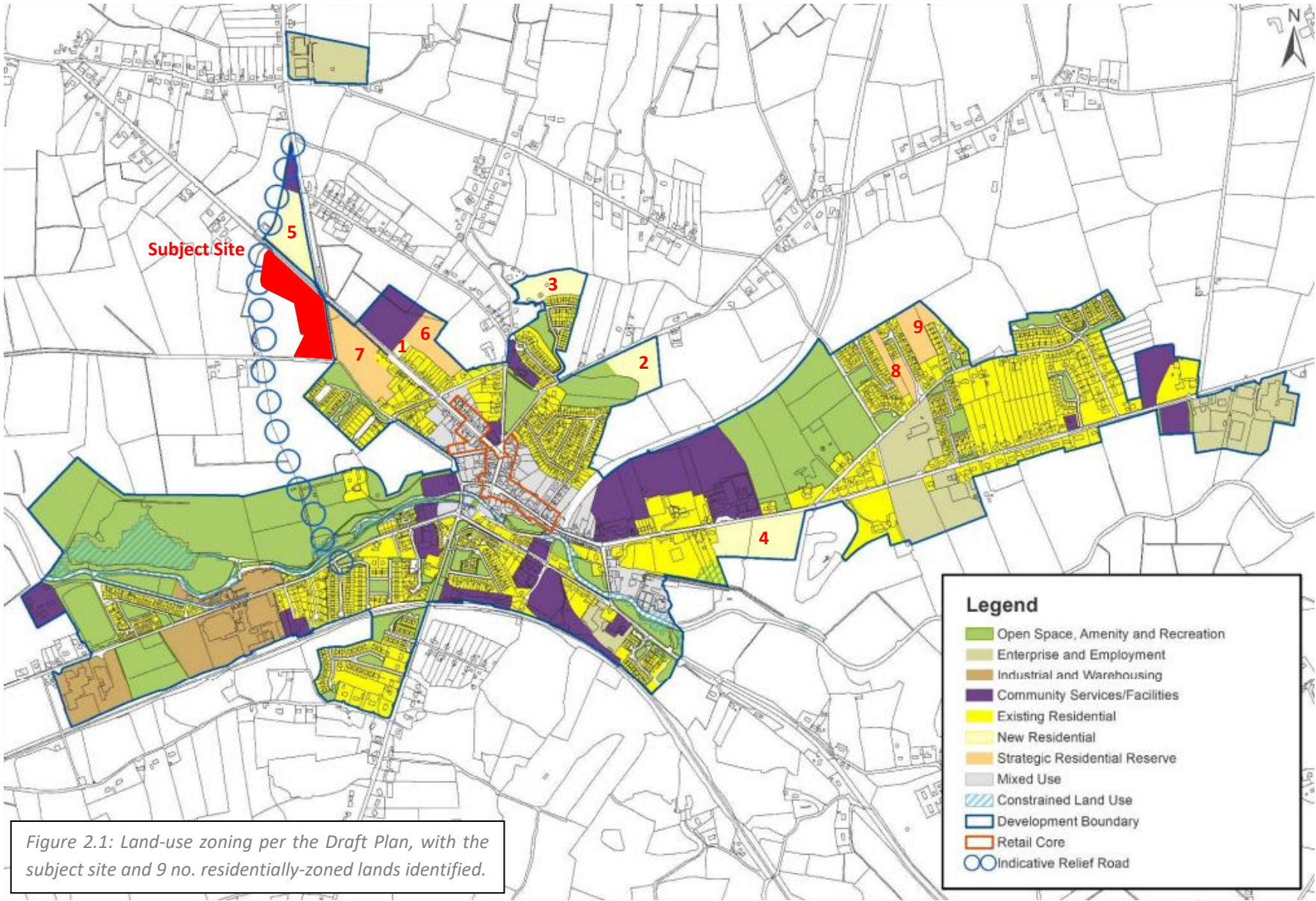


Figure 2.1: Land-use zoning per the Draft Plan, with the subject site and 9 no. residentially-zoned lands identified.

2.1 Compact Growth and Sequential Development

The sequential approach to development must be adopted in Development Plan preparation, as required by *Development Plans: Guidelines for Planning Authorities* and *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)*.

The principles of the sequential approach involve the designation and development of more central and accessible lands first, generally working on the basis of prioritising lands in the centre of a settlement first and then radiating out (Figure 2.2).

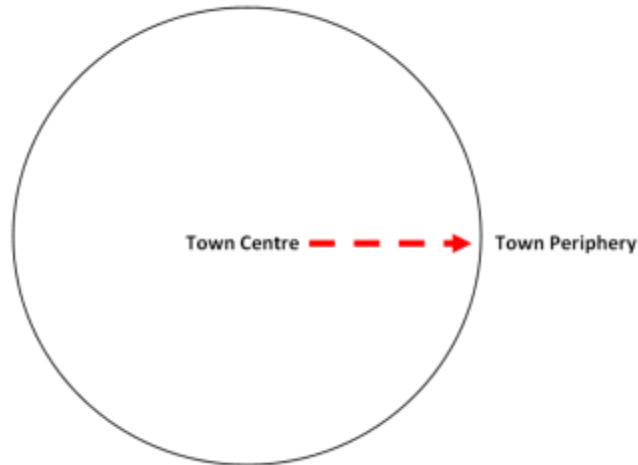


Figure 2.2: The principles of the sequential approach.

Evidence of the adoption of the principles is detailed in the Draft Plan's policies, as seen in Core Strategy Policy CSP-02:

*"It is Council policy to **support the compact growth of towns** and villages to ensure that development proceeds sustainably and at an appropriate scale, density and **sequence** and in line with the Core Strategy Table." [emphasis added]*

The principles are also clear in Settlement Strategy Policy 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**." [emphasis added]*

Specifically in relation to the settlement of Clara, Settlement Strategy Policy SSP-10 also prioritises a sequential approach to development:

*"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." [emphasis added]*

This approach to the planning and development of settlements is sound and underpinned by the creation of compact urban forms, thereby increasing the efficiencies of service provision, creating critical mass to support business viability, making vibrant town centres, reducing dependency on car ownership and use, increasing the attractiveness of walking and cycling, protecting land and environments/habitats and addressing climate change.

Appropriately, the Draft Plan correctly advocates for the sustainable development of Clara by way of compact growth that follows a sequential approach. **However, as the following assessments shows, it appears as though the above policies relating to the sequential approach to zoning and development have not been fully applied during the process of zoning land in Clara.**

2.2 Applying the Sequential Approach

To demonstrate the appropriateness of the subject site as a location at which to plan for and develop housing, a comparative assessment involving the application of the principles of the sequential approach to the subject site and the 9 no. sites zoned for residential development has been undertaken.

With the town centre defined as the Main Street, just south of The Square, the 10 no. sites (from approximately their central points) were assessed and ranked based on their distance from this point. More centrally located sites ranked higher (better) and more peripherally located sites ranked lower.

As detailed in Table 2.2, Site 6 was identified as being the closest to the town centre (albeit marginally), with Site 9 the farthest. The subject site ranked sixth, at approximately 759 m from the town centre. Among those sites that are farther from the town centre than the subject site – and therefore less sequentially appropriate – are 2 no. sites zoned for ‘New Residential’ (not just ‘Strategic Residential Reserve’); Sites 4 and 5. **Consequently, it can be firmly asserted that the subject site is more centrally and appropriately located than others, and its designation for residential development in lieu of other lands would accord more directly with the principles of the sequential approach. Therefore, it would appear that the principles of the sequential approach as set out in the Draft Plan have not been fully adhered to in terms of the zoning of land in Clara in the Draft Plan.**

Table 2.2: Ranking of the subject site and other residentially-zoned sites based on the principles of the sequential approach.

Site	Area (ha)	Current Zoning	Proposed Zoning	Distance to Town Centre	Rank
6	1.39	Residential	Strategic Residential Reserve	444	1
1	0.14	Residential	New Residential	457	2
2	1.60	None	New Residential	518	3
7	2.60	Residential	Strategic Residential Reserve	535	4
3	1.50	None	New Residential	565	5
Subject Lands	2.80	Residential	Dezoned	759	6
4	2.58	Residential	New Residential	813	7
5	2.00	Residential	New Residential	930	8
8	0.91	Residential	Strategic Residential Reserve	1,211	9
9	1.32	Residential	Strategic Residential Reserve	1,298	10

2.3 Sequential Approach and Proximity to Facilities and Amenities

FAC undertook further objective analysis of the subject site and the 9 no. sites proposed to be zoned as ‘New Residential’ and ‘Strategic Residential Reserve’. This analysis sought to determine the appropriateness of

residential development on each of the 10 no. sites in a more holistic way, taking account of the various sites' proximity to a series of amenities and facilities. The factors considered as part of this exercise were the distances of each of the sites (approximate central points) to:

- The town centre (sited as Main Street, just south of The Square),
- The train station,
- Scoil Bhríde (girls primary school),
- Scoil Phroinsias Naofa (boys primary school),
- Ard Scoil Chiarain Naofa (co-educational secondary school),
- Clara Swimming Pool,
- Clara Library and
- Junction 6 on the M6.

Other factors, such as the presence of protected structures, recorded monuments and places, tree preservations, flood risk, etc., which could act as constraints or benefits on-site were considered as additional assessment criteria. **However, all sites were deemed to have the same attributes in these regards and would score in the same way.**

The findings of the above assessment are summarised in Table 2.3 (overleaf) and fully detailed in Appendix 1. The final rankings reflect those revealed following the application of the sequential approach ranking (as shown in Table 2.2, above), except Sites 1 and 6 have swapped first and second place ranks. The subject site holds its place as sixth.

This additional analysis further underscores the findings set out in Section 2.2; that the subject site is a sequentially appropriate site to be developed for housing during the lifetime of the new Plan. It is better located and more sequentially suitable than 4 no. other sites, including 2 no. that are currently marked for residential development during the lifetime of the new Plan, once adopted.

Table 2.3: Ranking of the site based on proximity to the town centre and a range of amenities and facilities.

Site	Area (ha)	Current Zoning	Proposed Zoning	Distance to Town Centre Rank	Distance to Train Station Rank	Distance to Scoil Bhríde (Primary) Rank	Distance to Scoil Phroinsias Naofa (Primary) Rank	Distance to Ard Scoil Chiarain Naofa (Secondary) Rank	Distance to Clara Swimming Pool Rank	Distance to Clara Library Rank	Distance to M6 (J6) Rank	Score	Final Rank
1	0.14	Residential	New Residential	2	1	7	5	3	1	1	4	24	1
6	1.39	Residential	Strategic Residential Reserve	1	3	6	4	4	3	3	5	29	2
2	1.60	None	New Residential	3	5	2	2	1	5	6	7	31	3
7	2.60	Residential	Strategic Residential Reserve	4	2	8	6	5	2	2	3	32	4
3	1.50	None	New Residential	5	7	1	3	6	6	5	6	39	5
Subject Site	2.80	Residential	Dezoned	6	4	9	9	7	4	4	2	45	6
4	2.58	Residential	New Residential	7	6	5	1	2	7	8	10	46	7
5	2.00	Residential	New Residential	8	8	10	10	8	8	7	1	60	8
8	0.91	Residential	Strategic Residential Reserve	9	9	3	7	9	9	9	9	64	9
9	1.32	Residential	Strategic Residential Reserve	10	10	4	8	10	10	10	8	70	10

3.0 Aligning with the Core Strategy’s Housing Allocation

Table 2.2 (‘Core Strategy Table’) of the Draft Plan sets out the estimated population increases and associated housing requirements for the period from 2016 to 2027. For Clara, based on population growth of 534 people, there will be a requirement to deliver some 198 no. residential units. Guided by the Strategy’s residential density of 25 units per hectare (uph), this will require approximately 8.0 ha of land to be made available¹. It should be noted that following a review of the residential planning pipeline in Clara, there is no evidence of any large residential schemes having been granted in the town in the last 5 years. Therefore, the full requirement of 198 no. units will need to be met, as a minimum.

Table 3.1 has set out the subject site and the 9 no. sites that benefit from zoning in the Draft Plan in the final ranking order as determined in Section 2.3; the subject site is sixth of ten. In doing so, it calculates the cumulative area of the sites in a sequential way. It is evident that the top 5 no. sites have a combined area of 7.2 ha, which would be insufficient to meet the estimated requirement for residential land in Clara, as set out in the Core Strategy of the Draft Plan.

Table 3.1: Subject site and residentially-zoned sites in Clara.

Site	Final Rank	Current Zoning	Proposed Zoning	Area (ha)	Cumulative Area	Status
1	1	Residential	New Residential	0.1	0.1	Insufficient
6	2	Residential	Strategic Residential Reserve	1.4	1.5	
2	3	None	New Residential	1.6	3.1	
7	4	Residential	Strategic Residential Reserve	2.6	5.7	
3	5	None	New Residential	1.5	7.2	
Subject Site	6	Residential	Dezoned	2.8	10.0	Slight exceedance, but necessary to meet land requirement
4	7	Residential	New Residential	2.6	12.6	Exceedance
5	8	Residential	New Residential	2.0	14.6	
8	9	Residential	Strategic Residential Reserve	0.9	15.5	
9	10	Residential	Strategic Residential Reserve	1.3	16.8	

Informed by the above, it is firmly asserted that the subject site – as the next most sequentially appropriate site – should have its zoning designation amended to ‘New Residential’ in the *Offaly County Development Plan 2021–2027* and be prioritised for development ahead of sites 4, 5, 8 and 9 to make up the balance to meet the 8.0 ha of residential land required in Clara up to 2027.

While it is noted that this will result in a slight exceedance of the land requirement for residential development, there are several important reasons why this should be considered to be acceptable:

1. Providing a small portion of additional lands ensures that there are options for development and that a shortage of such lands in the town does not occur if some become unavailable or undevelopable.
2. Additional lands would also prevent the creation of an oligopoly in the town, which may stymie development and result in increased property prices due to reduced competition.

¹ 198 no. units / 25 uph = 8 ha

3. Not all residential lands may come forward for residential development or solely for residential development during the life of the new Plan. As lands zoned as 'New Residential' have permitted and open for consideration uses other than residential (e.g. hairdressing salon, hostel, laundrette, gym, etc., per the Draft Plan), there is a chance that portions of the 8 ha of residentially zoned may be lost to facilitate these other development types. Consequently, there would be a shortfall in lands available for residential development.
4. Should population growth exceed the estimated projections, there should be a safeguard in place to ensure that housing can be delivered in a timely manner – this would be making sure than sufficient lands is available for development.

4.0 Proposed Development at the Subject Site

The designation of the subject site as ‘New Residential’ in the *Offaly County Development Plan 2021–2027* would enable the efficient delivery of a development thereat during the lifetime of the Development Plan. It would provide for a faster delivery of housing than that which could be delivered on other sites in Clara that are newly proposed to be zoned as ‘New Residential’ in the forthcoming Development Plan.

ITC (Delta 77) are committed to the delivery of housing on the subject site. Their commitment is evidenced by their commencement of the process to progress appropriate site layout configurations, including the illustrative site layout shown in Figure 4.1 (overleaf). As shown, the layout proposes a mix of detached and semi-detached units, as well as step-down units for older people and a small area of mixed-use (primarily residential, with complementary, ancillary uses). The form and type of housing to be developed on the site is currently flexible, with the ability to respond to the required housing need at the time of the planning application. It is currently envisaged that a range of typologies can be facilitated, responding to a variety of household types as the population of Clara continues to grow and its demographic profile changes, with specific provision anticipated for family housing and step-down housing for older people. The layout also incorporates a significant quantum of amenity space.

The emerging proposition will align with many of the key residential policies in the Draft Plan, inclusive of those highlighted below.

“HP-02 It is Council policy to seek to ensure that groups with special housing needs, such as older people (in accordance with the Age Friendly Strategy for Offaly 2018-2021 and any subsequent editions), single person households, persons with physical and / or learning disabilities, the homeless, the travelling community, asylum seekers and refugees, and those in emergency accommodation are accompanied in a way suitable to their specific needs.”

Alignment with Policy HP-02: The proposed delivery of step-down units for older people as part of the overall development will assist in ensuring the specific housing needs of older people are met. It will also meet the housing needs of other groups by complying with Part V requirements.

“HP-07 It is Council policy to ensure that a mixture of house types, tenures and sizes is developed to reasonably match the requirements of different categories of households, and ensure that the special requirements of older persons, persons with disabilities and persons with learning difficulties are developed in convenient, easily accessible and permeable locations.”

Alignment with Policy HP-07: The proposed development will deliver a range of housing types, tenures and sizes in a very accessible location. The preliminary layout proposes to deliver a mix of detached and semi-detached houses of varying sizes, as well as step-down units for older people which responds to the changing demographic profile of Clara. However, this layout is presently flexible and will respond to the housing need at the time of the planning application to ensure it is met.

“HP-08 It is Council policy as required under section 95 of the Planning and Development Act 2000 (as amended) that 10% of all land zoned for residential or for a mixture of residential and other uses shall be reserved for the provision of housing for the purposes of meeting social and affordable housing need arising in the county.”

Alignment with Policy HP-08: The Project Team will happily engage with the Housing Department of OCC to reach an agreement in principle with respect to the provision of social and affordable housing. The proposed development will thus assist in meeting the need for such housing in the area.



5.0 Concluding Remarks

This submission has provided an objective, evidence-based assessment of the subject site and the 9 no. sites zoned for residentially development in the Draft Plan. It has revealed that the subject site is appropriately located and should be zoned for residential development during the lifetime of the Plan.

Specifically, this submission has concluded that:

- The subject site is a sequentially appropriate site for development, ranking 6th amongst the 10 no. sites assessed based on proximity to the town centre;
- The subject sites is a sequentially appropriate site for development, ranking 6th amongst the 10 no. sites assessed based on proximity to the town centre and a select number of key facilities and amenities;
- The subject site ranks better in both assessments than 2 no. sites that are proposed in the Draft Plan to be zoned as ‘New Residential’;
- Informed by the above rankings, following the application of the sequential approach and the graded prioritisation of centrally located lands, the subject site is necessary to meet the land requirement for residential development in Clara and to deliver housing in a sequential manner;
- Zoning the subject site for residential uses is required to ensure consistency in the Draft Plan with respect to the Core Strategy’s policies relating to the use of sequential approach to residential development and its actual application to land-use zoning in the Draft zoning maps.
- The designation of the subject site as ‘New Residential’ in the *Offaly County Development Plan 2021–2027* would enable the efficient delivery of a development on this site over the lifetime of the new Plan, with I.T.C. (Delta 77) committed to the delivery of housing on the subject site.

Consequently, it is respectfully requested that OCC recognise the merit in designating the subject site with a residential land-use zoning – specifically ‘New Residential’ – and act accordingly as the Development Plan is finalised.

Appendix 1

**Draft Offaly County Development Plan 2021–2027:
Clara Land-Use Zoning Submission**

Site	Area (ha)	Current Zoning	Proposed Zoning	Distance to Town Centre (m)	Rank	Distance to Train Station (m)	Rank	Distance to Scoil Bhríde (Primary) (m)	Rank	Distance to Scoil Phroinsias Naofa (Primary) (m)	Rank	Distance to Ard Scoil Chiarain Naofa (Secondary) (m)	Rank	Distance to Clara Swimming Pool (m)	Rank	Distance to Clara Library (m)	Rank	Distance to M6 (J6) (m)	Rank	Score	Final Ranking
Subject Site	2.79	Residential	Dezoned	759	6	879	4	1,380	9	1,138	9	1,031	7	787	4	708	4	5,967	2	45	6
1	0.14	Residential	New Residential	457	2	750	1	1,059	7	824	5	754	3	585	1	493	1	6,254	4	24	1
2	1.60	No	New Residential	518	3	890	5	491	2	488	2	691	1	841	5	777	6	6,792	7	31	3
3	1.50	No	New Residential	565	5	977	7	114	1	748	3	855	6	855	6	771	5	6,442	6	39	5
4	2.58	Residential	New Residential	813	7	947	6	838	5	434	1	706	2	983	7	1,004	8	7,426	10	46	7
5	2.00	Residential	New Residential	930	8	1,181	8	1,514	10	1,295	10	1,219	8	1,005	8	995	7	5,757	1	60	8
6	1.39	Residential	Strategic Residential Reserve	444	1	773	3	1,012	6	800	4	755	4	628	3	525	3	6,268	5	29	2
7	2.60	Residential	Strategic Residential Reserve	535	4	770	2	1,142	8	892	6	783	5	588	2	513	2	6,188	3	32	4
8	0.91	Residential	Strategic Residential Reserve	1,211	9	1,482	9	644	3	942	7	1,240	9	1,488	9	1,460	9	7,396	9	64	9
9	1.32	Residential	Strategic Residential Reserve	1,298	10	1,586	10	766	4	1,060	8	1,351	10	1,575	10	1,548	10	7,388	8	70	10