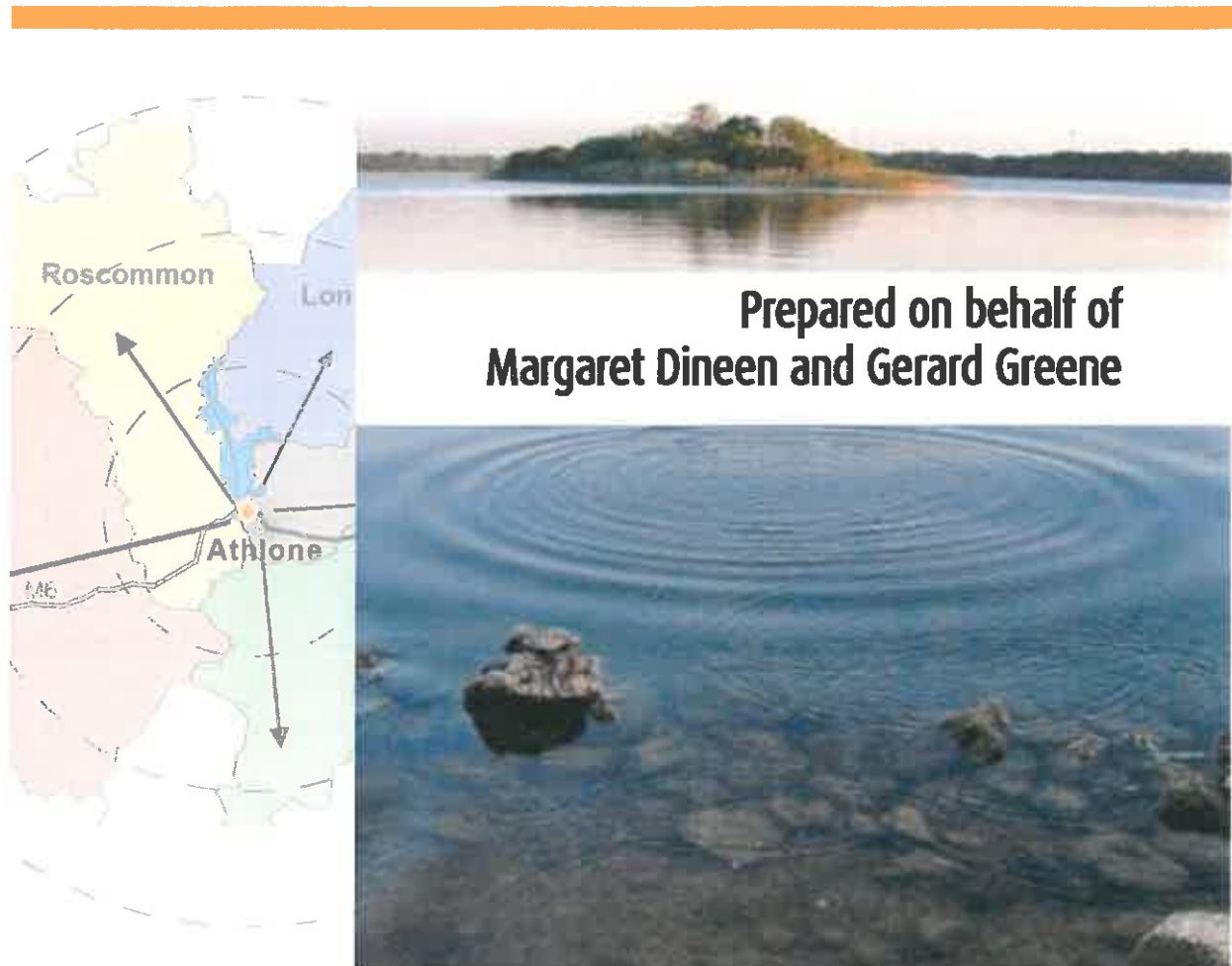


Draft Regional, Spatial and Economic Strategy for the Eastern and Midland Region

Submission in respect of lands at Barry More, Athlone, Co. Roscommon

January 2019



1. Introduction & Overview of Submission

We act on behalf of Margaret Dineen and Gerard Greene, who are the owners of 15.95 (inclusive) hectares of land parcels identified in Figure 1 below. This submission is made in response to public notices inviting submissions from interested parties on the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region.

Our client's lands are situated in the central location of Barrymore, Athlone, Co. Roscommon, a mere ten minutes to the northwest of Athlone town. We welcome the recognition of Athlone as a "Regional Growth Centre" in the Draft RSES with a "high level of self-sustaining employment and services" that acts as a regional economic driver playing an integral role on the wider catchment area. However, we submit that the lands outlined are strategically important in terms of housing delivery in the wider Athlone area and that the Barrymore sites outlined should be afforded a low-density residential zoning objective in the next Hodson Bay/Barrymore Area Plan to meet the current demands for housing. Site 4 will be reserved for amenity / tourism purposes.

It is for this reason that we are making this submission on behalf of our clients to include as a specific objective in the RSES setting out that a mix of low-density residential developments will be acceptable in areas where low density development is prominent to consolidate locations such as Athlone which are illustrated as important Regional Growth Centres to unlock potentially strategically important landbanks. The Barrymore area is a currently well established residential location bordering the Roscommon and Westmeath borders.



Fig. 1 Aerial view of lands at Barrymore, Athlone, Co. Roscommon. Sites outlined in red.

This submission requests that further consideration be given to Athlone and its surrounding areas as a "Regional Growth Centre" for employment, shopping and leisure with the surrounding village nuclei being used for a mix of low-density residential development for the following reasons:

- There is a strategic need to zone additional lands for low density residential development within Regional Growth Centres to help address the current shortfall of zoned residential land in strategic locations in close proximity to large town centres;
- To complement the existing, recently granted and proposed residential developments in the area; and
- Realise the potential of lands in village nuclei that are eminently suitable for residential development.

The rationale for these requests is outlined in detail below. The remainder of this submission is set out as follows:

2. Site Context & Planning History;
3. Planning Policy Context;
4. Rationale for Requests;
5. Summary & Conclusion.

2. Site Context and Planning History

2.1 Site Context

The subject sites are located northwest of Athlone town centre in the townland of Barrymore. Lough Ree lake is located to the east. The area surrounding the sites is characterised by a mix of uses but is primarily residential in character comprising a significant number of one-off houses.

Our client's lands are located approximately 600 metres to the east of the N61, a key national route providing direct access to a focus of major national routes namely the M6, N6 and N55. The sites are accessed via the Woodlands road just off the N61 which serves several residential properties. The Castlebar to Dublin rail line is located approximately 7 km south of the subject area. The sites currently comprise 5 different land parcels all currently being served for agricultural purposes. The furthest east site (Site 4) is an unutilised land parcel made up of scrub, hedges and some trees with potential to serve as a tourism / amenity area given its location and proximity to the waterfront of Lough Ree.

As can be seen from Figure 1 above, development in Barrymore comprises lower density settlement development, with only pockets or infill sites left remaining to be developed. Over time, this has provided for the construction of a number of homes along separate routes such as that of Woodlands road just off the N61. As indicated in the aerial photograph, our client's can provide strategic residential land banks to help address the significant need for additional low-density residential development within this part of the Eastern and Midland Region within a defined settlement boundary and gateway locations to Dublin and Galway.



Fig. 2 Extract from National Planning Framework 2040.

2.2 Planning History

There is only 1 planning application pertaining to the above-mentioned land parcels within the ownership of our client.

18/176

Planning permission was recently granted in May 2018 on Site 4 to Jennifer O'Meara & Derek Keenan for the construction of a dwelling house, detached domestic garage, new entrance, connection to services and all ancillary site works at Barrymore, Athlone, Co. Roscommon on Site 5 of our client's lands.

The following is a synopsis of previous applications on adjoining lands of sites.

17/480 ABP-300988-18

In January 2018, planning permission was refused by Roscommon County Council for the demolition of an agricultural outbuilding, the construction of 21-unit housing development consisting of 7 No. two storey detached houses, 14 No. two storey semi-detached houses. The development will be accessed from the existing public road and the proposed development will include estate roads, footpaths, public open space, connection to existing public services and sewers, landscaping and all associated infrastructure works and services at Barrymore, Athlone Co. Roscommon.

Permission was refused on the basis that the height and design of the development would not integrate in to an already established area and would be contrary to the Hodson Bay/Barrymore Area Plan 2014-2020. Furthermore, it was also noted that the form, layout and design of the proposal would be out of character with the area and existing development pattern and permitting such a development would set an undesirable precedent. It was finally noted that inadequate information was submitted with the proposal and in particular the absence of a Natura Impact Statement.

13/3062

In July 2013, planning permission was granted by Roscommon County Council for the Extension of Duration on PD/07/1939 - to construct 3 no. two storey detached dwellings with individual proprietary waste treatment systems and garages; new vehicular entrance onto The Rise and all other associated site and landscaping works at Barrymore, Athlone Co. Roscommon.

11/467

Planning permission was granted by Roscommon County Council on the 4th July 2012 for a residential development consisting of; The demolition of a disused dwelling house, the construction of 6no. two storey detached dwelling units and associated domestic garages, the provision of 1no. new development access entrance/exit onto the public road and development access roads, ancillary landscaping along with connection to public services and sewers including all associated site development works at Barrymore, Kiltoom, Athlone, Co. Roscommon.

11/304 PL20.240181

Similarly, in January 2012 planning permission was granted for a residential development consisting of: The demolition of a disused agricultural outbuilding, the construction of 50 No. dwelling units and associated garden sheds comprising of 47 No. two storey detached units, and 3 No. bungalow units, the provision of 1 No. new development access entrance/exit onto the public road and development access roads, 1 no. new pedestrian access entrance/exit, ancillary landscaping along with connection to public services and sewers including all associated site development works at Barrymore, Athlone Co. Roscommon. This decision was later overturned by An Bord Pleanála who stated that the application was had not been justified in terms of housing need and would conflict with the provisions set out in the "Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)" issued by the Department of the Environment, Heritage and Local Government in May, 2009.

3. Planning Policy Context

National Planning Framework 2040

The Department of Housing Planning and Local Government, on behalf of the Government, has prepared and published the finalised National Planning Framework (NPF) under Project Ireland 2040, the overarching policy and planning framework for the social, economic and cultural development of our country.

One of the ultimate objectives of the NPF is to guide the future development of Ireland, considering a projected 1 million increase in the Country's population, the need to create 660,000 additional jobs to achieve full employment and a need for 550,000 more homes by 2040. Between 490,000 and 540,000 of this additional population target is to be located in the Eastern and Midland Region.

As noted under National Policy Objective 2b "*The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda- Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy.*"

National Policy Objective 6 of the National Planning Framework states that "*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*" should be regenerated and rejuvenated.

Section 6.6 on 'Housing' sets out a number of national core principles to guide the delivery of future housing, in particular, prioritising the location of new housing provision in existing settlements as a means to maximise 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 following objectives are considered relevant to the development of the Athlone region:

“National Policy Objective 4: Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 5: Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

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 7: Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth.

National Policy Objective 32: To target the delivery of 550,000 additional households to 2040.

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.”

Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines 2009

The Guidelines for Planning Authorities on “Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)” issued by the Department of the Environment, Heritage and Local Government in 2009, provides guidance in relation to the provision of lower densities on sites.

Section 5.12 of the guideline's states that provision for lower densities will be allowed to:

“...facilitate a choice of housing types within areas, limited provision may be made for lower density schemes provided that, neighbourhood or district as a whole, average densities achieve any minimum standards recommended....”

Roscommon County Development Plan 2014-2020

The Roscommon County Development Plan 2014-2020 sets out a number of general policies in relation to housing developments:

“Policy 5.1: Facilitate the provision of an adequate supply of private housing in the County, in a manner consistent with the Core Strategy, Settlement Hierarchy and Housing Strategy, which will support the creation of sustainable communities through the provision of an appropriate range of housing types, sizes and high-quality residential environments.

Policy 5.5: Ensure that new housing development in towns and villages is of appropriate scale, layout and quality design and that it relates to the character and form of the settlement.

Policy 5.6: Emphasise quality, innovation and a design-led approach in all housing development with proposals appropriate to each site and location

Policy 5.7: Ensure that, where relevant, housing development will be subject to screening for Appropriate Assessment in accordance with Article 6(3) of the Habitats Directive.”

Hodson Bay/Barrymore Local Area Plan 2014-2020

The subject sites (1, 2 & 3) are zoned as Transitional Agricultural Uses (TA) in the Hodson Bay/Barrymore Area Plan 2014-2020 as illustrated in Figure 2 below. The following is stated under the TA zoning objective:

- *Preserve the character of rural or edge areas and provide for agricultural development as well as other uses not directly associated with agriculture, such as housing for family members, or those with a housing need, tourist related projects such as caravan parks or campsites, and amenity such as playing fields and parks, in order to avoid a sharp transition between the urban edge and primarily agricultural areas.*
- *Prohibit development that would create premature demand for infrastructural services.*
- *Prohibit new residential development to essential housing need.*
- *Agricultural diversification will be considered in these areas.*
- *Guard against urban sprawl and ribbon development particularly along the national road network*

Lands to the east (Area 4) are zoned mainly as Greenbelt (G3) where it is an objective of the Hodson Bay/Barrymore Area Plan 2014-2020 to:

- *Protect the setting, character and environmental quality of areas of high natural beauty and safeguard their environmental, archaeological and ecological amenities.*
- *Prohibit any development that would give rise to significant adverse direct, indirect or secondary impacts on the integrity of any Natura 2000 sites having regard to their conservation objectives, (either individually or in combination with other plans or projects) unless imperative reasons of overriding public interest can be established.*
- *Provide a visual and environmental buffer, where appropriate, to preserve the natural amenity of the area such as alongside waterways, rivers and floodplains.*
- *Ensure this area is not used to satisfy the open space provision of adjoining housing developments.*
- *Prohibit development, which would detract from the visual amenity of the area or result in a loss of recreational open space.*



Fig. 3 Extract from the Hodson/Barrymore Area Plan 2014-2020

4. Rationale for Requests

4.1 Suitability of lands for residential development

The National Planning Framework 2040 acknowledges that up to 550,00 more homes will be needed in the Eastern and Midland Region by 2040. It is further noted that there is headroom to use “...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.” Through core strategy requirements and planning legislation, it is a mandatory requirement to provide adequate zoned land to address housing demand and to support a balanced house building market.

The NPF further recognises that there is current demand for housing within settlements and that “*planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.*”

As can be seen in Figure 1 and 3 above, our clients site adjoins a small portion of zoned residential lands with all the surrounding sites having been developed for lower density housing. Land parcels, such as that of our clients, should be made available for development to reinforce existing settlement patterns in the locality providing one large character area administering a viable alternative to rural housing. While the approach to Athlone is generally welcomed and supported in this submission, there is a lack of clarity in the draft RSES on the final shape of objectives surrounding lower density developments in existing settlements close to key towns. The draft RSES supports and welcomes residential development in village nuclei but does not directly address surrounding village nuclei of Regional Growth Centres being used for a mix of low-density residential development.

Moreover, the Barrymore/Hodson Bay Area Plan has currently zoned lands we consider unsuitable for residential development. The lands zoned residential are undulating with the land rising to the north from the road. A recent refusal was made on residentially zoned lands by Roscommon County Council and An Bord Pleanála (17/480 ABP-300988-18) for a residential development as the proposal by reason of its topography

would injure the existing amenities in the area. We consider that sites such as 1 and 2 as illustrated above would be more suitable for the zoning of residential development given their naturally flat topography, the existing road network accessing both sites and the proximity of site to Athlone town.

To minimize one off housing, existing settlements in the periphery of Regional Growth Centres or in this instance, the Barrymore/Hodson Bay Area, should be upgraded to a village with a core centre with minimum infrastructure. This core will in turn strengthen Athlone's hinterland and help develop vital communities and neighbourhoods.

4.2 Importance of Athlone as a Regional Growth Centre

As seen in Figure 4 below, Athlone is in a strategically important location and is a key centre for five different counties and a gateway location between the west and east of the country. Moreover, in national terms, it is imperative that Athlone be earmarked as a regional growth centre of strategic importance to the development and growth of the Eastern and Midland Region.

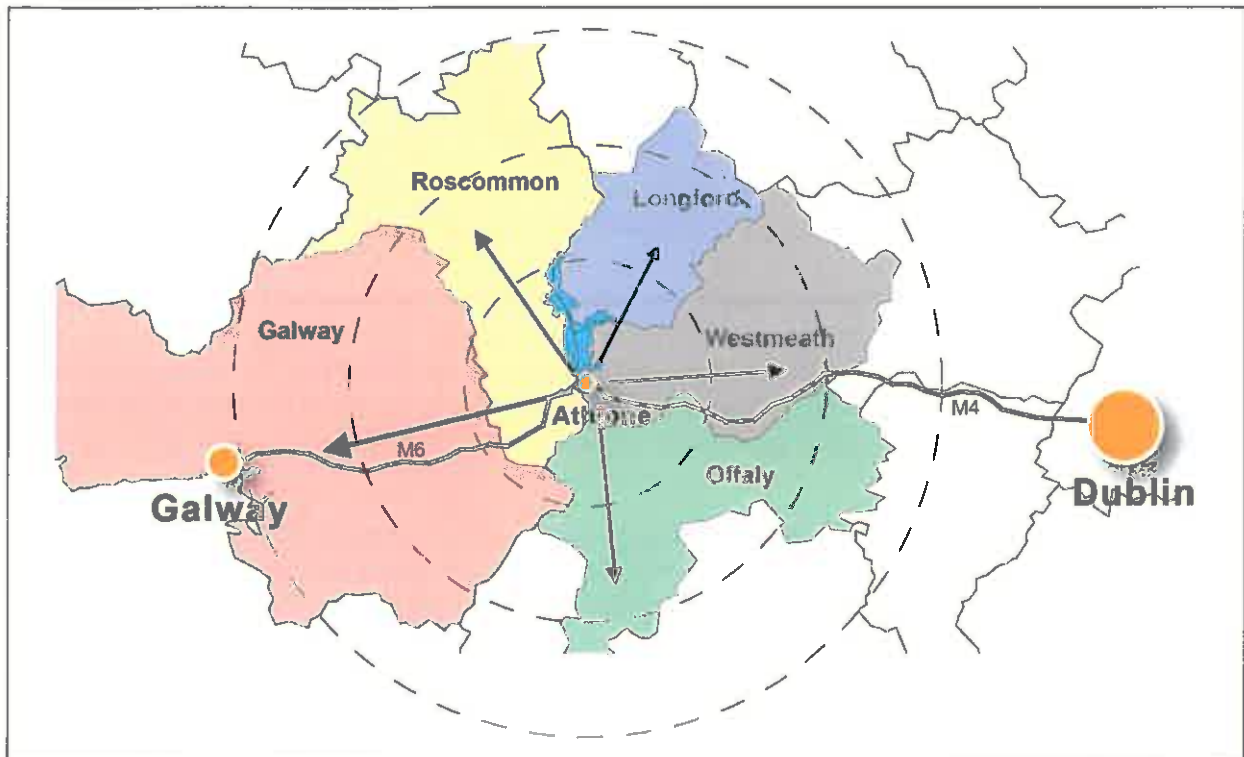


Fig. 4 Location of Athlone in a national context.

In a more local context and in line with the Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines 2009, Figure 5 below illustrates hubs of existing lower density developments surrounding Athlone town. In order to avoid demand for 'one off' rural houses, lower density settlements will provide attractive locations which are uniquely designed for couples and families alike looking to live within close proximity of towns for employment purposes while having the element of 'countryside life'. Therefore, the RSES should include a clear and concise objective stating that the surrounding village nuclei of Athlone and similar large employment hub towns will be considered for a mix of low-density residential development and in turn will improve local services such as tourism/amenity services and local infrastructure.

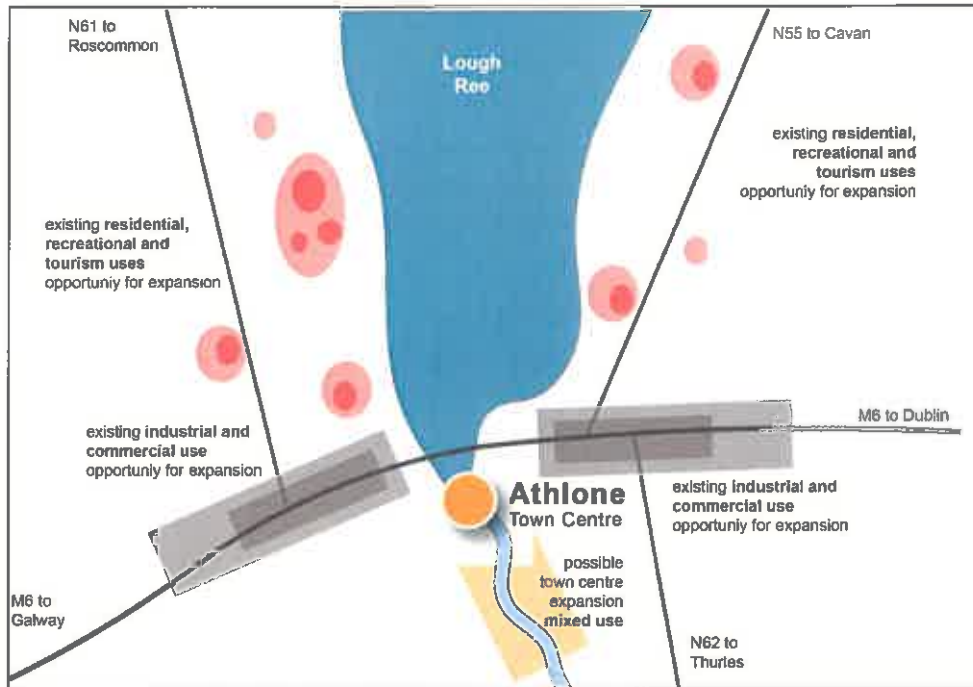


Fig. 5 Location of existing settlements in the context of Athlone.

Given the location of the Barrymore/Hodson Bay village along the waterfront of Lough Ree, amenity and tourism potential in these locations is prominent. In line with similar locations such as that of Ballyvalley/Craglea in Co. Clare, Garrykennedy in Co. Tipperary and Dromineer, Co. Tipperary, the creation of attractive amenity walkways and parks will provide a tourism element to the area which can be enjoyed by residents and tourists alike without significantly impacting on Special Areas of Conservation or Special Protected Areas.

In this regard, Figure 6 below illustrates a suitably zoned map using Barrymore, Athlone, Co. Roscommon as an example area where an existing village nucleus has a high level of low density residential development close to a large town with potential to expand on natural amenity and promote its location as a village nucleus in relation to a Regional Growth Centre with a significant population. Moreover, the zoning map as annotated unlocks potentially strategically important landbanks in an existing village where low density development is prominent whilst allowing for the provision of an amenity development through the village and along the waterfront. Therefore, we are requesting that there is a specific objective included in the RSES setting out that a mix of low-density residential developments will be acceptable in areas where low density development is prominent in close proximity to Regional Growth Centres.

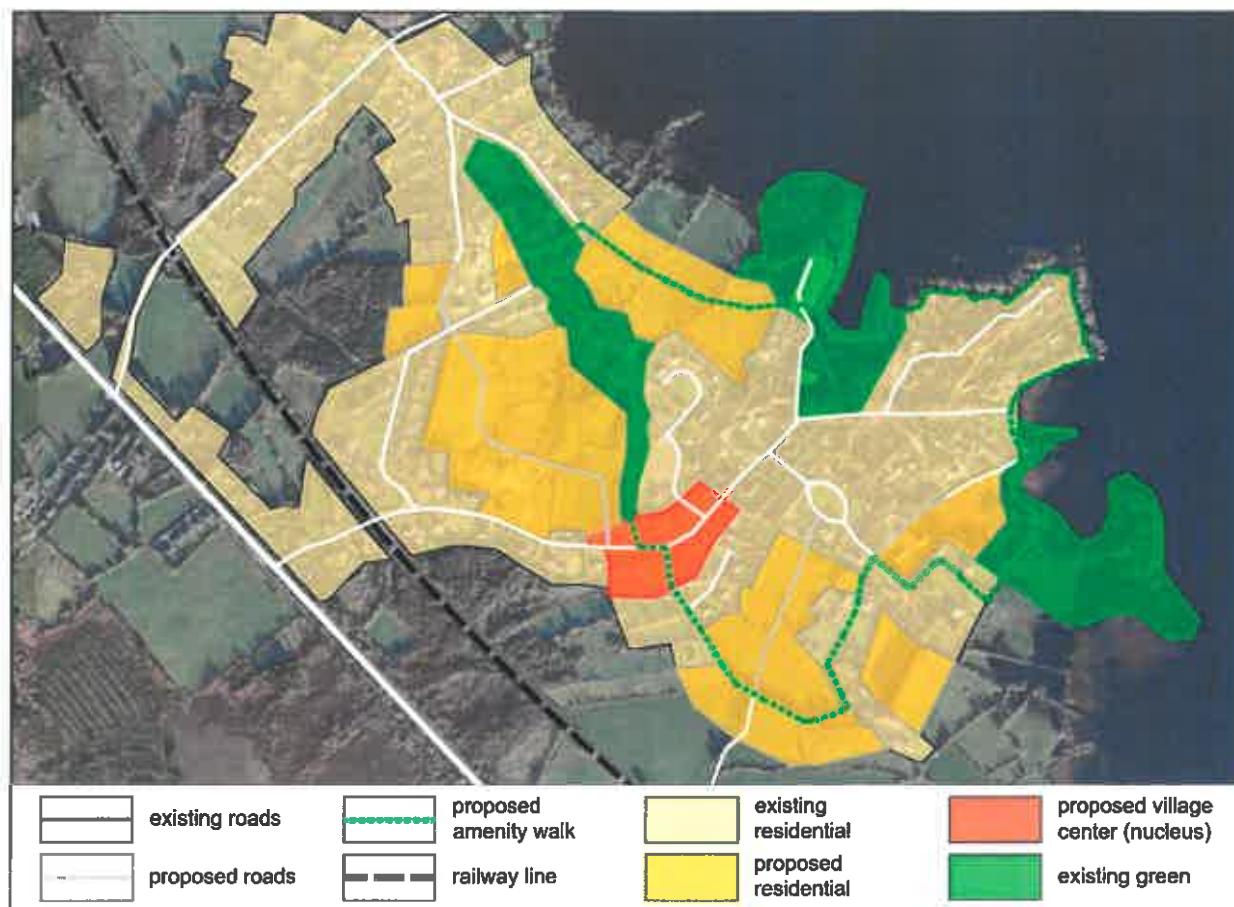


Fig. 6 Potential zoning map for Barrymore, Athlone, Co. Roscommon.

5. Summary and Conclusion

Accordingly, we submit that the RSES include a specific objective setting out that a mix of low-density residential developments will be acceptable in areas where low density development is prominent in close proximity to large employment hub towns or more specifically Regional Growth Centres. Without effective objectives, pockets or infill sites in existing villages will continue to lie idle and essentially will serve no purpose.

Moreover, the current housing crisis and lack of available and serviceable development land requires a decisive response by identifying additional lands that can be brought forward by the construction industry to meet housing needs in existing settlements close to large employment hub towns.

We trust that this submission will be taken into consideration in the preparation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. If you have any queries in relation to the above, please do not hesitate to contact our office.

Yours sincerely,

Andrea Mc Auliffe

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