

22<sup>nd</sup> November 2023

OPR Ref: IP-033-23

Planning Department,

Westmeath County Council,

Civic Offices,

Mount Street,

Mullingar,

N91 FH4N

Re: Pre-Draft Strategic Issues Paper for the Mullingar Local Area Plan 2024 - 2030

A chara,

Thank you for your authority's work in preparing the Issues Paper (the Issues Paper) for the proposed Mullingar Local Area Plan 2024 - 2030 (the LAP).

The planning authority is commended for publishing a well-structured and informative Issues Paper, engaging proactively with the public, and notifying the Office of the Planning Regulator (the Office) of the intention to prepare the LAP.

In accordance with the provisions of section 31AO of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess local area plans to ensure alignment with national and regional planning policy and the objectives of your county development plan.

The Office has set out some broad issues relevant to the preparation of local area plans, in addition to some specific issues of particular relevance to the preparation of the LAP, under the following headings:

- 1. Strategic policy framework
- 2. Development plan and core strategy
- 3. Zoning, compact growth and infrastructural services
- 4. Regeneration



- 5. Education, social and community amenities
- 6. Economic development, employment and retail
- 7. Transport and mobility
- 8. Climate action, including flood risk management
- 9. Environment and natural and built heritage
- 10. Implementation and monitoring

The comments are offered without prejudice to any observations and recommendations by the Office at future stages of the plan-making process. They also do not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

## 1. Strategic policy framework

Section 20(5) of the Act requires the LAP to be consistent with the objectives of the Regional Spatial and Economic Strategy (RSES), National Planning Framework (NPF), the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant development plan.

The RSES recognises Mullingar as a 'Key Town' which is located on the Dublin to Sligo rail line and M4 motorway, providing an essential role in supporting population and job creation in the county. The RSES defines 'Key Towns' as:

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 RSES (Table 4.3) outlines the policy response for Key Towns as 'commensurate population and employment growth on high quality public transport corridors coupled with investment in services, amenities and sustainable transport'.

The Office welcomes the commencement of the preparation of the LAP in line with policy objective CPO 2.6 of the Westmeath County Development Plan 2021 – 2027 (the Development Plan) which commits to the preparation of an LAP for Mullingar to align with the RSES and core strategy.



The RSES states that the consolidation and regeneration of Mullingar is a key priority to support the overall role and function of the town and this will be a key issue to address in the forthcoming LAP.

Of particular relevance to the preparation of the LAP is the need to address RPOs 4.64, 4.65, 4.66 and 4.67, and provide a framework to activate any strategic development sites such as Columb Barracks and St. Loman's for the delivery of residential, employment or other uses identified in the RSES.

The Office encourages the planning authority to liaise with the Eastern & Midland Regional Assembly (EMRA) in the preparation of the draft LAP, particularly where clarity is required on how the objectives and guiding principles set out in the RSES relate to the LAP.

## 2. Development plan and core strategy

Section 19(2)(b) of the Act requires the LAP to be consistent with the objectives of the Development Plan and its core strategy. This is also a key message of the section 28 *Local Area Plans Guidelines for Planning Authorities* (2013) (LAP Guidelines).

In this regard, the Office notes that the core strategy of the Development Plan provides for a population increase of 5,075 persons to 2027 and identifies a housing yield with a range of 1340 – 2010 units. The LAP will need to more clearly identify the estimated housing yield available from serviced land zoned for residential and mixed use taking into account any infrastructure assessment undertaken, and provide mechanisms to deal with any excess zoned lands available and not required over the LAP period.

The Offices notes that the according to the 2022 census, there were 22,667 people living in the town representing an 8.3% increase on the previous census period 2016 – 2022. While this represents a relatively positive trend, this rate of population increase would not enable the town to reach the population targets of the chosen scenario<sup>1</sup> for 2027 and 2031 set out in Table 2.6 of the core strategy, which are 26,003 and 27,849 respectively.

In this regard, the emerging LAP should seek to accelerate Mullingar's ongoing population growth while ensuring that it is done in a sustainable manner with a key focus on housing delivery on key strategic sites and opportunities for regeneration.

<sup>&</sup>lt;sup>1</sup> Proportional Intervention (Pi) Scenario C targets are referenced on page 12 of the Issues Paper.



# 3. Zoning, compact growth and infrastructural services

The OPR assessment will also carefully consider whether proposed zoning objectives can demonstrate consistency with the objectives for compact growth and densification<sup>2</sup> under the NPF (NPO 3; NPO 35) and the RSES (RPO 3.2). The implementation of effective compact growth to avoid urban sprawl also plays a key role in climate change mitigation.

The RSES recognises that the provision of housing plays a fundamental role in the overall economic, social and environmental success of the town. In this regard, it is essential to ensure that an effective supply of land for the provision of housing is delivered in the most sustainable locations in line with the principles of compact growth.

The Office welcomes the approach set out in the Issues Paper in respect of compact growth particularly the commitment to focus new development in Mullingar's existing brownfield and backlands.

In relation to residential development, any provisions or standards for density or building height in the LAP should have regard to relevant section 28 guidelines and any SPPRs therein, including:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages (2009);
- Urban Development and Building Heights Guidelines for Planning Authorities
   (2018); and
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020).

Land use zoning should follow a sequential approach so that the development of lands closest to the town centre are prioritised over lands on the outskirts of the town, as set out under section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines).

The planning authority also needs to ensure that lands that cannot be serviced within the lifetime of the LAP are not zoned for development, consistent with the tiered approach to

<sup>&</sup>lt;sup>2</sup> Including through reductions in vacancy, re-use of existing buildings, infill development, area or site-based regeneration and increase building heights.



zoning under NPO 72 a-c of the NPF. In this regard, an infrastructure assessment should be prepared in accordance with Appendix 3 of the NPF and section 4.5.2 (Settlement Capacity Audit) of the Development Plans Guidelines.

In particular, the planning authority should engage early with Uisce Éireann regarding the long-term and interim measures to ensure delivery of a safe and reliable water supply.

### 4. Regeneration

Both the NPF (NPO 4 urban places; NPO 6 urban regeneration; NPO 18a proportionate growth; NPO 18b new homes and NPO 35 increasing residential use) and the policy objectives of the RSES emphasise the importance of opportunities for urban regeneration to create attractive, liveable, and high quality urban places. The reuse of brownfield sites and vacant buildings will also contribute to climate change mitigation.

The Office notes that the Development Plan makes a commitment to facilitate a significant proportion of population growth on infill and brownfield sites through the redevelopment and regeneration of underused, vacant or derelict town centre and urban lands. In this regard, the Office notes the Issues Paper's references to available funding sources and commends the planning authority on its success in securing funding to support regeneration projects in Mullingar such as the *Blackhall Urban Quarter* and *The Canal Avenue and Environs Regeneration Project*.

The Office encourages the planning authority to further explore how the LAP can deliver on urban regeneration / redevelopment by identifying specific opportunity sites as well as implementation mechanisms to support further land activation such as compulsory purchase. Where such sites are identified, the planning authority should prepare a development framework for future development with appropriate guidance regarding layout, massing, permeability, green infrastructure and Sustainable urban Drainage Systems (SuDS) etc. as set out in section 5.7 of the LAP Guidelines.

The Office notes that objective CPO 7.31 of the Development Plan commits to preparing a building heights study as part of the LAP for Mullingar. In this regard, the planning authority should, as part of the preparation of the draft LAP, undertake the relevant analysis and commencement of the building heights survey in order to facilitate the delivery of town centre and urban led regeneration in accordance with *Urban Development and Building Heights Guidelines for Planning Authorities* (2018).



## 5. Education, social and community and amenities

Access to quality childcare, education and health services is a National Strategic Outcome of the NPF. The LAP should therefore seek to align population growth with investment in childcare and education facilities on well-located sites within or close to the existing built-up areas, to meet the diverse needs of local populations.

The Office welcomes the commencement of a Social Infrastructure Audit which seeks to analyse the availability and capacity of existing social infrastructure and to assist in determining future requirements within the town. The Office notes that significant increases in the provision of education and childcare services and sports / recreation facilitates will be required to accommodate Mullingar's projected population growth as well as the provision of healthcare and community services. In this regard, the planning authority should consult directly with the Forward Planning and Site Acquisitions Section of the Department of Education in respect of the future delivery of education facilities.

The local authority's *Local Economic and Community Plan* (LECP) and *Traveller*Accommodation Programme should also inform the LAP, as relevant to provide for the coordinated spatial planning of housing and community services for the area.

#### 6. Economic development, employment and retail

The NPF, RSES and section 28 guidelines emphasise the need to take an evidence-based approach to the inclusion of objectives for employment and other commercial uses. The Office notes that Mullingar is a focal point for economic development and modern industry in the Midlands as one of the region's largest key towns.

In this regard, the emerging LAP should be aligned with the detailed economic strategy and all relevant guiding principles of the RSES, in addition to any objectives concerning strategic enterprise / employment sites. The RSES recognises Mullingar as a strong economic driver providing for a diverse employment range including consumer products, financial services, robotics and advanced manufacturing. The town hosts an existing IDA presence as well as a number of high-quality enterprise and employment zones including business parks facilitating sectors such as engineering, ICT, consumer products and financial services.



The Office notes that Mullingar's jobs ratio of 1.079 (2016) is one of the highest overall ratios in the region. In this regard, the Office encourages the planning authority to support Mullingar's role as an important employment hub by promoting economic development and clustering of related enterprises in line with RPO 4.67 and objective CPO 5.17 of the Development Plan.

In terms of identifying the optimal locations for employment zonings, the key criteria should be compact growth, the sequential approach to development, and the options for sustainable transport having regard to the need to mitigate climate change. The reuse of appropriate brownfield sites and vacant premises should also be prioritised. In this regard the emerging LAP should seek to identify strategic employment development sites within Mullingar in line with objective CPO 5.7 of the Development Plan.

The facilitation of retail facilities also need to be considered to provide for the anticipated population growth. Particular regard should be given to the sequential approach to the location of retail development and other provisions of the *Retail Planning Guidelines for Planning Authorities* (2012) (Retail Guidelines), and the position of the town in the retail hierarchy of the Development Plan and RSES.

An integrated approach to land use and transport planning for enterprise, employment and commercial development will also play an important role in mitigating climate change and in achieving the Government's obligatory target of 51% for greenhouse gas (GHG) emissions reduction by 2030 and for a carbon neutral economy by 2050.

### 7. Transport and mobility

The Office notes the strategic location of Mullingar along the Dublin – Sligo rail line and adjoining the national road network (N4 / M4 and N52) which connect the town with Regional Growth Centres and Key Towns within and beyond the EMRA region.

The *Climate Action Plan 2023* identifies the need to significantly reduce car kilometres and increase sustainable journeys, guided by the *National Sustainable Mobility Policy* (2022) (NSMP) and the proposed *National Demand Management Strategy*.

The integration of land use and transportation is centrally important to this objective and to the objectives and provisions of the NPF (NPO 27 alternatives to the car; NPO 33 location of new homes and NPO 64 air quality, among others) and the RSES.



The Office welcomes the preparation of a Local Transport Plan (LTP) to inform the LAP as supported by the RSES using the Area Based Transport Assessment methodology, and consistent with RPO 8.6 and objective CPO 10.9 of the Development Plan.

The planning authority is strongly advised to liaise with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in the preparation of the LTP and incorporate its key measures and actions into the final LAP. In addition, the LAP should set out an ambitious (but realistic) modal shift target for the town.

The Office notes that the findings of the *Mullingar Town Centre Health Check* indicate that improved provision of traffic management measures, public transport services and sustainable mobility infrastructure is required to deliver on any future modal shift away from the private car.

In this regard the LAP should seek to increase the potential for trips to be made on foot, bicycle or public transport as well as demonstrate consistency with the Avoid-Shift-Improve principle and the 10-minute town concept, as well as providing for the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) and the NTA's *Permeability Best Practice Guide*.

The Office commends the planning authority on commencing the phase 1 concept and feasibility stages of the Kilbeggan to Mullingar Greenway. This project seeks to provide a strategic greenway between the Old Rail Trail and the Grand Canal Greenway to provide a c. 150 km lopped route linking the towns of Mullingar, Athlone and Tullamore.

#### 8. Climate action, including flood risk management

It is a National Strategic Outcome of the NPF to transition to a low carbon climate resilient society. The effective implementation of climate mitigation objectives through the LAP are critical to the achievement of the Government's GHG emissions reduction targets.

In addition to the cross cutting climate considerations discussed above, consistency with:

- NPO 53 (land use);
- NPO 54 (climate targets);
- NPO 55 (renewable energy); and



NPO 57 (flood risk),

together with the relevant objectives of the RSES and Development Plan, will be of particular importance in this respect.

The Office notes that Mullingar has been nominated as the Decarbonising Zone (DZ) for Westmeath; this will be important for the various strategies, plans and ideas that that will contribute to the overall target for the country to become carbon neutral by 2050.

The emerging LAP should recognise the role of Mullingar as the DZ for the county in setting out a range of climate mitigation, adaptation and biodiversity measures in order to contribute to national climate action targets. The Office welcomes the commitment set out in the Issues Paper to prepare a policy framework for a place-based approach to climate action focused on several areas of action including (but not limited to) transport, buildings, land and environmental value, air quality and waste management.

It is likely that flood risk management will be the most critical climate action issue to be addressed in the LAP, informed by a Strategic Flood Risk Assessment (SFRA).

The planning authority should ensure that the LAP is consistent with NPO 57 by avoiding inappropriate development in areas at risk of flooding, in accordance with the detailed requirements and provisions of section 28 *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009). These guidelines require a staged approach to flood risk assessment and, in particular, the application of the sequential approach and the requirement to carry out the plan-making justification test where appropriate.

The planning authority should liaise with the Office of Public Works (OPW) in the early stages of preparing the SFRA and overlay the flood risk zones on any proposed land use zoning maps to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied. The planning authority is also requested to make a copy of digital mapping data available to the Office and to the OPW to facilitate assessment.

In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, such as SuDS. In this regard, the Office draws the planning authority's attention to *Nature-based Solutions to the Management of Rainwater and* 



Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document (2021).

### 9. Environment and natural and built heritage

The planning authority is the competent authority for Strategic Environmental Assessment and Appropriate Assessment, and will be aware of the section 28 *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities* (2022) and the *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities* (2010).

The planning authority should also ensure the LAP is consistent with objectives of the NPF and RSES concerning environmental protection. From our experience in assessing statutory plans, the Office has found that, in addition to the objectives identified above that might also apply to this subject, particular consideration should be given to:

- NPOs 58 (green infrastructure);
- NPO 62 (greenbelts);
- NPO 63 (water infrastructure); and
- NPO 64 (air quality).

The Office also highlights the importance of integrating green and blue infrastructure into the LAP consistent with NPO 58. Planning for green and blue infrastructure can contribute to climate change adaptation, in particular flood risk management through nature-based solutions. It can also make a positive contribution to climate mitigation and have positive impacts on biodiversity.

Regarding built-heritage, the planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP. Accordingly, the planning authority should have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities* (2011), as amended.

#### 10. Implementation and monitoring

The NPF and the RSES place increased emphasis on the importance of monitoring the implementation of statutory strategies and plans to measure plan-effectiveness and to continually update a relevant evidence-base to inform future planning strategies.



The planning authority is therefore encouraged to set out specific provisions for monitoring the implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines.

## Summary

In summary, the Office commends the local authority on the overall quality of this Issues Paper, which is informative and uses effective info-graphics.

The Office advises the local authority to pay particular attention to the following issues in the preparation of the LAP:

- the LAP should recognise the need to accelerate Mullingar's recent population growth while ensuring that its overall approach to growth is sustainable with an emphasis on compact growth and regeneration;
- the LAP should ensure that land use zoning is informed by an infrastructural
  assessment and follows a sequential approach so that serviced lands closest to the
  town centre are prioritised over peripheral locations;
- the LAP should provide clarity regarding the nature and extent of any significant infrastructure constraints, particularly in relation to interim measures to address water supply capacity issues. The planning authority is advised to consult with Uisce Éireann in relation to this matter;
- the quantum of zoned land required for housing should be consistent with the core strategy of the Development Plan, and clearly identify the potential yield from land zoned for residential and mixed use development;
- the LAP should include a sound framework for urban regeneration / redevelopment which includes identifying specific opportunity sites as well as implementation mechanisms to activate same:
- the LAP should be informed by a building heights survey / analysis to identify suitable locations to facilitate higher and increased building heights in accordance with CPO 7.31 of the Development Plan;
- the LAP should support Mullingar's role as an important employment hub by promoting economic development and clustering of related enterprises in line with RPO 4.67 of the RSES;



- the key implementation measures and actions from the Local Transport Plan should be incorporated into the final LAP. The Athy Local Area Plan 2021 – 2027 provides a good example of how to effectively integrate the key measures and actions from its supporting transport strategy;
- the planning authority is advised to liaise with the NTA and TII in the preparation of the LTP, and the OPW in the preparation of the SFRA; and
- in respect of climate action, the LAP should recognise the role of Mullingar as the DZ for the county in setting out a range of climate mitigation, adaptation and biodiversity measures including measures to promote modal shift.

The Office looks forward to reviewing the future draft LAP and to continued positive engagement with your authority in the implementation of national and regional policies at the county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Is mise le meas,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations