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# Re: Issues Paper for the Athlone Joint Urban Area Plan 2024-2030

A chara,

Thank you for your authorities' work in preparing the Issues Paper (the Issues Paper) for the proposed Athlone Joint Urban Area Plan 2024-2030 (the JUAP).

The Office notes the intention of the planning authorities to prepare an Urban Area Plan for the joint settlement under the provisions of sections 68 and 72 of the *Planning and Development Bill 2023,* which is yet to be enacted.

The OPR commends both planning authorities for publishing an Issues Paper, engaging proactively with the public, and notifying the Office of the intention to prepare the JUAP.

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 this JUAP, under the following headings:

- 1. <u>Strategic policy framework</u>
- 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
- 9. Flood risk management
- 10. Environment and natural and built heritage
- 11. 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 authorities 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 a local area plan 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 Office notes that Athlone is strategically located centrally within the country with excellent accessibility for both rail and road movements. This strategic location can facilitate movements between major urban centres including Dublin (90 minutes), Dundalk (90 minutes) and Galway (60 minutes).



The NPF recognises that Athlone has an influence that extends to part of all three Regional Assembly areas. Given the importance of regional interdependencies, the NPF emphasises the need to prepare a co-ordinated strategy for Athlone, to ensure that the town and environs has the capacity to grow sustainably and to secure investment, as the key regional centre in the Midlands.

Of particular relevance to the JUAP is National Policy Objective (NPO) 7 which seeks to strengthen Ireland's overall urban structure to include the regional centre of Athlone.

The Office welcomes the commencement of the cross boundary statutory JUAP for Athlone consistent with Regional Policy Objectives (RPO) RPO 4.4 and RPO 3.7.1 of the RSES for the Eastern and Midland Regional Assembly (EMRA) and Northern and Western Regional Assembly (NWRA) respectively.

Both RPO 4.4 and RPO 3.7.1 state that the JUAP shall identify Athlone's functional urban area and adopt a boundary for the JUAP area, in addition to the identification of strategic housing and employment development areas and infrastructure and investment requirements to promote greater coordination and sequential delivery of serviced lands for development.

The RSES for the EMRA contains RPOs which relate to Athlone's strategic employment role such as RPO 4.5 which seeks to promote Athlone as a key location for regional economic development to support the provision of increased employment and RPO 4.10 which seeks to support the development of joint economic, transport and retail plans by Westmeath and Roscommon County Councils. The policy intent in the aforementioned RPOs is also reflected in RPO 3.7.3, RPO 3.7.9 and RPO 3.7.16 of the RSES for the NWRA.

Furthermore, the RSES for the EMRA makes it clear that a boundary for the plan area should support compact growth targets in order to facilitate new residential development being built within the existing built-up footprint. Fundamental to this is the large scale and comprehensive delivery of lands at Curragh, Lissywollen South, Cornamagh, Cornamaddy and Monksland / Bellanamullia. The JUAP should also consider the relationship with the satellite villages of Hodson Bay and Glasson which are the nearest fully serviced and



zoned areas to Athlone<sup>1</sup>, particularly in relation to sustainable transport modes in line with any objectives and/or policies emerging from the Local Transport Plan (LTP). Page 76 of the RSES for the NWRA lists criteria to be considered for determining the plan boundary, for example:

- the principle urban area population of Athlone should account for at least 75% of the total population of the regional centre plan area;
- the existence of transport strategies; and
- future development opportunities, including phasing and prioritisation of development infrastructure.

The Office welcomes the intended strategic vision which sets out a forward-facing approach to maximising Athlone's strengths, addressing constraints and identifying new cross-cutting opportunities for growth and improvement which will allow Athlone to realise its potential as a Regional Growth Centre up to 2030 and beyond.

The Office encourages the planning authorities to liaise with both NWRA and EMRA in the preparation of the draft JUAP, particularly where clarity is required on how the RPOs and guiding principles set out in the RSES for the EMRA and NWRA relate to the emerging JUAP.

# 2. Development plan and core strategy

Section 19(2)(b) of the Act requires a local area plan 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).

The Regional Growth Centre Strategic Plan in the RSES for the NWRA recognises that the JUAP is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population which should be generally in proportion to existing levels in each planning authority area.

While the Office acknowledges that the Westmeath County Development Plan 2021-2027 and the Roscommon County Development Plan 2022-2028 include an anticipated housing yield figure and housing allocation figure for Athlone respectively, the Office advises that a

<sup>&</sup>lt;sup>1</sup> Page 76 of the RSES for the NWRA.



critical issue for the JUAP is the need to determine a housing supply target figure for the overall joint settlement to the end of the JUAP's plan period.

This figure should then inform the quantum of zoned lands required for residential development having regard to the recommended density ranges for Regional Growth Centres in section 3.3.2 of the *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities* (2024).

In this regard, the Office encourages the respective authorities to allocate lands which are deemed serviced and/or serviceable to deliver development during the plan period. Any surplus lands which are identified for additional provision and/or long term strategic reserve should also be framed on an evidence-based approach which considers the future serviceability and prioritisation of sustainable transport modes in line with the objectives / policies of the LTP.

Sections 4.4.3 and 4.4.4 of the *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines) provide guidance on Additional Provision and Long-Term Strategic and Sustainable Development Sites respectively. Further, the Office advises that the zoning approach used for the Regional Growth Centre of Sligo Town in the Draft Sligo County Development Plan 2024-2030 provides an example of good practice.

The Office welcomes the ambition set out in the Issues Paper which seeks to ensure that resilience is built into Athlone's housing stock through the provision of an adequate range of housing types, sizes and tenures for both renters and owner-occupiers and encourages the planning authorities to have regard to section 2 of the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2023).

In summary, the JUAP will have a critical role in identifying a sufficient quantum of zoned and serviced lands to cater for the anticipated and agreed housing requirement at appropriate locations within the plan area, and be informed by a comprehensive Settlement Capacity Audit which should clearly examine the serviceability of lands which are intended to be zoned for development in the emerging JUAP.



### 3. Zoning, compact growth and infrastructural services

The assessment undertaken by the OPR will carefully consider whether the proposed zoning objectives are consistent with the national / regional objectives for compact growth and regeneration such as NPO 3 and NPO 35<sup>2</sup> in the NPF and RPO 3.7.2 in the RSES for the NWRA.

A critical issue for the emerging JUAP is the need to prioritise future urban development on infill / brownfield sites and include mechanisms to activate underused, vacant or derelict lands for residential development to provide for compact growth. Zoning objectives should also be consistent with any strategic development sites for the delivery of residential, employment or other uses identified in the RSES for the EMRA and NWRA, for example, the key growth areas for industry and technology, residential and regeneration sites in Figure 26 of the RSES for the NWRA.

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

- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024);
- Urban Development and Building Heights Guidelines for Planning Authorities (2018); and
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023).

In this regard, the emerging JUAP should ensure that it delivers on CPO 3.7 of the Westmeath County Development Plan 2021-2027 which seeks to apply higher densities to Athlone in order to align with its role as a Regional Growth Centre, subject to good design practices and development management standards.

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



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.

This is particularly relevant to RPO 3.7.2 of the RSES for the NWRA and RPO 4.8 of the RSES for the EMRA which seeks to support the regeneration of underused town centre and brownfield / infill lands along with the delivery of existing zoned and serviced lands to facilitate significant population growth and achieve the compact growth target of 30% of all new homes to be built within the existing built up area.

The Development Plans Guidelines advise that larger settlements normally have certain development sites that play a critical role in achieving the core strategy and NPF policy objectives for consolidation and compact growth. These sites should be specifically identified as Settlement Consolidation Sites and integrated into the wider regeneration strategy for the settlement.

The planning authorities also needs to ensure that lands that cannot be serviced within the lifetime of the JUAP are not zoned for development, consistent with the tiered approach to zoning under NPO 72 a-c of the NPF.

### 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 and village 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 commends the planning authorities on securing funding for several regeneration projects across Athlone which include, but are not limited to;

- Athlone Town Centre Regeneration and Enhancement;
- Athlone Tourism Cultural Quarter,
- Loughanaskin, Athlone; and
- Monksland Life Sciences Hub.



That being said, the Office would encourage the planning authorities to formulate an evidence-based approach for the identification of additional regeneration sites, or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration.

The Office notes that RPO 3.7.17 of the RSES for the NWRA and policy objective CPO 7.31 of the Westmeath County Development Plan 2021-2027 refer to the need to prepare a building height study to inform the JUAP.

The Office also notes and commends the planning authorities on the commencement of an Urban Design and Regeneration Framework Plan which will seek to prioritise and plan for a pipeline of projects to reimagine streets and re-open backlands to deliver a compact and smart growth-based approach to Athlone's future regeneration. In this regard, the JUAP should align with the objectives and ambitions of the emerging Urban Design and Regeneration Framework Plan for Athlone including any guidance or recommendations on building height.

It is further noted that the RSES supports the regeneration of underused, vacant and derelict lands within the town centre to future strengthen the retail and commercial functions of Athlone.

The Office recommends that the JUAP includes a strong policy framework to support the utilisation of existing buildings, brownfield / infill sites, and derelict and underutilised sites. The planning authorities should consider proactive land activation measures including powers for land acquisition / compulsory purchase and derelict sites and vacant land. The JUAP should also align with sources of funding to facilitate key regeneration projects such as the recently announced *Croí Cónaithe (Towns) Fund Scheme*, and TCF-aligned funding streams under the Government's *Town Centre First, A Policy Approach for Irish Towns* (2022).



#### 5. Education, social and community and amenities

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

The Office commends the planning authorities on their commitment as set out in the Issues Paper to prepare a policy framework for Athlone to ensure that new development integrates appropriately with sustainable transport modes and social / community infrastructure to ensure that Athlone's growth is balanced, socially inclusive and meets the current and future needs of the towns neighbourhoods and communities.

The provision of investment in education and training are central to reinforcing the delivery of sustainable communities, promoting inclusion and offering choice and accessibility to a high standard of education and employment.

Importantly, the JUAP should be cognisant of RPO 4.6 of the RSES for the EMRA which seeks to the support the role of Athlone Institute of Technology (AIT) as a centre of excellence for education and in achieving its status as Technological University. It is noted that AIT has a student population of over 5,000 which derive from a broad catchment area, and as such the provision of suitable student accommodation will need to be considered in the JUAP.

The Office encourages the planning authorities to engage with the Forward Planning Section and Site Acquisition and Property Management Section of the Department of Education. The need for further school sites should be determined via an evidence-based approach taking account of proximity to public transport services and active travel methods.

The planning authorities' Local Economic and Community Plans (LECP) and Traveller Accommodation Programmes should also inform the JUAP to provide for the co-ordinated spatial planning of housing and community services for the area. In this regard, it is noted that the Westmeath County Council *Traveller Accommodation Programme 2019-2024* supports the upgrading of Blackberry Lane Halting Site in Athlone.



### 6. Economic development, employment and retail

The NPF, RSES and section 28 Guidelines emphasise the need to take an evidencebased approach to the inclusion of objectives for employment and other commercial uses.

The regional policy objectives in the RSES for the EMRA and the NWRA promote Athlone as a key location for regional economic development supporting the provision of increased employment, and as a key tourism destination in the Midlands. This is also reflected in the core strategies of the two development plans which contain a policy objective<sup>3</sup> supporting the continued growth of Athlone as an economic driver in the centre of Ireland.

The Office notes that key sectors such as ICT, pharmaceuticals, education, engineering and public administration provide for a significant employment base within Athlone, including AIT which is a recognised leader in driving market-informed research in collaboration with industry partners.

The RSES for the NWRA states that in order to cater for the employment demands arising from increased population targets, there are four specific areas which are critical to cater to for the town's employment and economic growth including;

- IDA Athlone Business and Technology Park / Garrycastle;
- Blyry;
- Creggan; and
- Monksland.

These areas comprise over 300 ha of undeveloped land and will need assessment to determine the most optimum lands for development over the lifetime of the JUAP. 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.

The Office commends both planning authorities for preparing joint economic and retail strategies to inform the JUAP. In this regard, the JUAP will need to integrate the key

<sup>&</sup>lt;sup>3</sup> Policy Objective CPO 2.2 in the Westmeath County Development Plan 2021-2027 and Policy Objective CS 2.8 in the Roscommon County Development Plan 2022-2028.



directions / policy recommendations from the *Economic Strategy for the Regional Centre* of *Athlone* (2022) and the key directions / policy recommendations from the *Athlone Joint Retail Strategy 2019-2026* including retail hierarchy, core retail area boundaries, retail opportunity sites and retail policies.

Furthermore, the emerging JUAP should prioritise the review of the range of uses permitted in the Business, Enterprise Park / Light Industry and Warehousing and District Centre zonings in the Monksland Bellanamullia Local Area Plan 2016-2022, in particular the flexibility afforded to retail type uses and uses that should be directed to the town centre.

# 7. Transport and mobility

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) 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 those contained in the RSES for the EMRA and the NWRA.

The RPOs of the RSES for the EMRA and NWRA and policy objectives in the Westmeath County Development Plan 2021-2027 and the Roscommon County Development Plan 2022-2028 support the preparation of a transport strategy / plan to support the JUAP.

In this regard, the Office commends both planning authorities for preparing a joint transport plan in advance of the draft JUAP. A critical issue will be to clearly demonstrate how the transport plan has informed the approach to zoning and to fully integrate any policies, objectives or measures contained in same into the JUAP.

The Office advises both planning authorities to engage with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) regarding the need for any refinements to the transport plan to ensure consistency with *Area Based Transport Assessment Advice Note* (2018) (ABTA) and *ABTA How to Guide Guidance, Document Pilot Methodology* (2021) as well as *Area Based Transport Assessment (ABTA) Guidance Notes* (2018). The LTP should inform the preparation of the JUAP and, in particular, the zoning provisions.



Also, the planning authorities should engage with the NTA and TII in respect of anticipated land use zonings and how sustainable transport modes will be incorporated into the delivery of strategic sites.

In order to increase the potential for trips to be made on foot, bicycle or public transport, the JUAP should 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*.

### 8. Climate action

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 JUAP are critical to the achievement of the Government's greenhouse gas emissions reduction target to mitigate climate change under the *Climate Action and Low Carbon Development Act* (2015), as amended (the Climate Act).

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

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

together with the relevant objectives contained in the RSES of the EMRA and the NWRA, and the Westmeath County Development Plan 2021-2027 and the Roscommon County Development Plan 2022-2028, will be of particular importance in this respect.

### 9. Flood risk management

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

The planning authorities should ensure that the JUAP 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) (Flood Guidelines). 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.

Flood risk zones should also be clearly overlaid 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 authorities are also requested to make a copy of digital mapping data available to the Office and to the Office of Public Works (OPW) to facilitate assessment.

A key issue for the forthcoming JUAP will be to devise an appropriate zoning strategy for the lands adjacent to and inside the recently constructed flood defence works.

The planning authorities are strongly advised to liaise with the OPW in the early stages of preparing the SFRA to avoid issues arising at draft JUAP stage. In particular, you should be aware that the Preliminary Flood Risk Area maps are preliminary assessments and should not be relied upon to inform zoning decisions.

In accordance with NPO 57, the JUAP is required to integrate sustainable water management solutions, such as Sustainable urban Drainage Systems (SuDS). In this regard, the Office draws the planning authorities' 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* (2022).

### 10. 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* (2009), as revised.

The planning authorities should ensure the JUAP is consistent with objectives of the NPF 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:



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

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

### 11. 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 authorities are therefore encouraged to set out specific provisions for monitoring the implementation of the objectives of the JUAP, having regard to the provisions of the Development Plans Guidelines and the LAP Guidelines.

### Summary

In summary, the Office commends both planning authorities for the preparation of a high quality issues paper and supporting material. The Office advises that there is a need to pay particular attention to the following issues in the preparation of the JUAP:

- the forthcoming JUAP will need to determine the functional urban area and plan boundary for the joint JUAP having regard to the regional policy objectives relating to same in the RSES for the EMRA and the NWRA;
- the planning authorities are required to determine the future housing supply target figure for the joint settlement to the end of the plan period;



- the JUAP should ensure that sufficient land is zoned to accommodate the future housing supply target for the joint settlement having regard to the density ranges for Key Towns contained in section 3.3.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024);
- land use zoning should follow a sequential approach so that the development of lands closest to the town centre is prioritised over lands on the outskirts of the town;
- the JUAP should clearly identify key regeneration and settlement consolidation sites having regard to the Development Plans Guidelines. Any surplus lands not required for the plan period should be clearly identified having regard to sections 4.4.3 and 4.4.4 of the aforementioned guidelines;
- the Office encourages the planning authorities to formulate an evidence-based approach for the identification of additional regeneration sites or vacant or underutilised buildings, generally, in accordance with the guiding principles of the RSES for urban infill and regeneration and include land activation measures to help reduce dereliction and vacancy;
- the Office encourages the planning authorities to finalise the preparation and implementation of a Local Transport Plan for Athlone which will encourage a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport;
- the key directions / recommendations from the joint retail and economic strategies should be integrated into the economic development and transport sections of the JUAP as appropriate;
- the Office encourages the planning authorities to include guidance and policy direction on building heights in the draft JUAP which is supported by an evidencebased approach such as a building height study / strategy or framework; and
- the planning authorities should 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 in accordance with the Flood Guidelines.

The Office looks forward to reviewing the future draft JUAP and to continued positive engagement with your authorities 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 authorities' 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,

C'Onna AM

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations