

Athlone Joint Urban Area Plan,
Administrative Officer, Planning Department,
Westmeath County Council,
Aras an Chontae,
Mount Street,
Mullingar,
Co. Westmeath
N91 FH4N

Date: 1st February 2024
Our Ref: RK 24008

Dear Sir/Madam,

RE: FORMAL WRITTEN SUBMISSION – PRE-DRAFT – ATHLONE JOINT URBAN AREA PLAN 2024-2030

On behalf of our client Glenveagh Homes Ltd. Block C, Maynooth Business Campus, Straffan Road, Maynooth, Co Kildare we wish to make a submission on the Pre-Draft Athlone Joint Urban Area Plan 2024-2030 (the “*Strategic Issues Paper*”).

Glenveagh is an Irish homebuilder who deliver high-quality new homes with an emphasis on high-quality design, innovation, sustainability, and people friendly communities. In this regard Glenveagh are uniquely positioned to help address the chronic housing shortage due to their ability to deliver large quantities of new homes in an efficient manner.

Glenveagh Homes welcome the publication of the Strategic Issues Paper by Westmeath County Council and Roscommon County Council which will enhance co-ordination of development in Athlone and will inform the future development of Athlone as a ‘*Regional Growth Centre*’ serving the centre of Ireland across two regions. The Core Strategy of the Westmeath County Development Plan 2021-22027 sets out the following objectives for Regional Growth Centre of Athlone:

- *CPO 2.2 Support the continued growth of Athlone, with a focus on quality of life and securing the investment to fulfil its role as a key Regional Growth Centre and economic driver in the centre of Ireland, with a target population of 30,000 up to 2031.*
- *CPO 2.3 Prepare a joint statutory Joint Urban Area Plan (UAP) for Athlone with Roscommon County Council in collaboration with EMRA and NWRA.*
- *CPO 2.4 Promote Athlone as a sustainable transport hub, of national and regional importance and support the preparation of a Joint Transport Plan between Westmeath and Roscommon County Councils in collaboration with transport agencies and key stakeholders to improve sustainable mobility in the town.*

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The Strategic Issues Paper identifies a strategic population target of 30,000 by 2031 (from an estimated population of 24,300 in 2021 in the Westmeath County Development Plan). However, it is noted the Census of Population indicated an overall population of some 22,869 persons in 2022, which is below the envisaged targets in the County Plan for 2021.

It is respectfully submitted that, the number of new homes required needs to be addressed in the draft Joint Urban Area Plan (JUAP). The publication of the pre-draft JUAP provides an important opportunity for the Westmeath and Roscommon County Councils to reflect the more up-to-date position of identified population growth and housing needs in 2023 following the publication of the 2022 census data from the Central Statistics Office. It is essential that this population growth is reflected in the quantum of zoned residential lands made available to provide for new family homes within the boundaries of the JUAP lands.

SUMMARY OF KEY RECOMMENDATIONS AND PRINCIPAL POINTS OF SUBMISSION

Glenveagh Homes Ltd., welcome the preparation of the Joint UAP for Athlone. This is an important policy document for the future development of Athlone which is a Regional Growth Centre in the RSES and which has been identified for significant population growth to 2031.

As set out in the Strategic Issues Paper, Athlone's central location, regional transport connectivity (e.g. road, rail, and public services), established infrastructure such as broadband and accessibility to other large Irish markets, such as Dublin City and Galway, have contributed to the town's robust economic base and extensive catchment area. It is important that residential development is provided within the JUAP area to rebalance the resident workers to total jobs ratio of 1.591 (as per NPF Appendix 2), which was some 50% higher than the next settlement in the table for the Eastern and Midland Regional Assembly area.

The 'Population and migration estimates for April 2023' were published on the 25th of September 2023 by the CSO. The CSO state that:

"Ireland's population was estimated to be 5.28 million, rising by 97,600 people in the year to April 2023. This was the largest 12-month population increase since 2008 when the population rose by 109,200."

Clearly the figures in the NPF are significantly out of date and do not reflect the much higher than anticipated population growth in recent years and the onus is on Planning Authorities to plan for future growth, particularly in locations with access to sustainable transport, education, and services.

The Strategic Issues Paper identifies a population increase of some 7,131 persons (or 31%) between 2022 (22,869 from the Census 2022) to 30,000 in 2031. This level of population increase will require substantial investment in infrastructure, (social, community and services) as well as a significant amount of residential zoned land to cater for and meet the required targets set out in the core strategy.

The Development Plan Guidelines 2022 explain that in providing housing sites for development within settlements, it may be necessary to zone **more serviced land** and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement (as calculated in the core strategy).

The JUAP may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. The result of this is after identifying the site/land requirements to meet the housing supply target for Athlone, the JUAP may also

identify additional sites/lands to ensure sufficient choice for development potential is safeguarded (and ultimately the overall targets are met).

The Guidelines provide, unequivocally, that planning authorities may provide zoned land **in excess** of that required to meet identified six-year targeted housing need (over and above the population headroom) and that land that is zoned in an existing plan and is serviced should not be dezoned. This is to reflect likely activation rates of housing completions over the period of the plan.

It is respectfully submitted that the JUAP for Athlone should ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the JUAP.

It is respectfully submitted that the draft JUAP fully recognises the existing housing shortfall and that it must incorporate the most recent and up to date information available in the form of the CSO 2022 Census data and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing for the Regional Growth Centre of Athlone.

It is noted Section 95 (1) of the Planning and Development Act 2000 (as amended), planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential, to meet the requirements of the housing strategy and to ensure that a scarcity of residential land does not occur at any time during the period of the plan. The onus is on the Local Authority to ensure that there is sufficient housing supply and zoned lands.

The new JUAP needs to take account of the time it takes for land to come forward, obtain planning permission, funding and for construction to be completed on site (which can occur over a number of plans). As such, sufficient 'headroom' for sites over and above that provided in population figures, needs to be provided in the JUAP to ensure consistency of supply to meet housing targets.

Given the 'Regional Growth Centre' designation of Athlone, coupled with its strategic location and access to public transport, existing well established employment areas, and the requirement to provide sufficient zoned land to meet the overall core strategy for Athlone, it is respectfully submitted that the town can cater for an increased number of houses than proposed in the Core Strategy and the Issues Paper. This is a fundamental issue which needs to be addressed with the most up to date population information available.

Glenveagh is supportive of the commentary contained in the Strategic Issues Paper in relation to place making and the built environment, particularly in respect of incorporating more intensive development within the urban regeneration frameworks and the (now recently published) Compact Settlement Guidelines and their contribution to place-making and preparing the appropriate criteria for future developments.

While recent reports suggest that the numbers of new dwellings is close to 33,000 per annum, while welcome, is considered to be below the actual need and the pent up demand of the under-delivery of housing over a 8-10 year period.

It is respectfully submitted that the draft JUAP for Athlone must incorporate the most recent and up to date information available in the form of the CSO 2022 Census data and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing.

1.0 ISSUES PAPER – REVIEW AND KEY CONSIDERATIONS

1.1 POLICY FRAMEWORK

The JUAP will need to comply with the provisions of higher level national, regional and county development plan policies and guidelines in accordance with section 19 of the Planning and Development Act 2000 (as amended). A number of key policy documents are considered below.

1.1.1 National Planning Framework (National Planning Framework)

As set out in the Strategic Issues Paper “A key component of Ireland’s 2040 growth strategy is the establishment, and effective use of, Regional Centres of Scale as focal points for employment, services and investment. The National Planning Framework (NPF) has designated Athlone as being a regional centre serving central Ireland due to its strategic location, scale and regional influence.”



In terms of specific national objectives relevant to Westmeath, the NPF includes a number of targets aimed at growing the Eastern and Midland Region:

- *Policy Objective 1a: The projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined.*
- *Policy Objective 1b: Eastern and Midland Region: 490,000 - 540,000 additional people i.e. a population of around 2.85 million.*

- *Policy Objective 1c: Eastern and Midland Region: around 320,000 additional people in employment i.e. 1.34 million in total.*

National Policy Objectives 2b and 7 recognise the key regional roles of Athlone in the Midlands, Sligo in the North-West, and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks and will inform the relevant Regional Spatial and Economic Strategies.

National Policy Objective 2b recognises the critical role of Athlone noting *“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 7 seeks to:

*“Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:- Dublin; the four Cities of Cork, Limerick, Galway and Waterford; **Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands** and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;*

The NPF notes that: *“Due to strategic location and scale of population, employment and services, Athlone has an influence that extends to part of all three Regional Assembly areas. Given the importance of regional interdependencies, it will be necessary to prepare a co-ordinated strategy for Athlone at both regional and town level, 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.”*

1.1.2 Review of National Planning Framework (April 2024)

It is important to highlight that in accordance with Section 20C of the Planning and Development Act, 2000 (as amended), the Government approved the commencement of the process to undertake a revision of the NPF which is scheduled to conclude in April 2024. This revision, currently underway, will provide an important review since its adoption in 2018 (based on population figure prior to its adoption), including changes to population and demographics, consideration of which is being informed by the final Census 2022 results.

It is important that the final JUAP for Athlone incorporates any uplift in population figures/allocations commensurate with the intra-regional position of Athlone as a Regional Growth Centre.

It is considered that the ESRI ‘Implementation Roadmap’ population figures which baked in lower population growth figures (as a result of the financial crisis and subsequent downturn 2009-2013) and forecasts are now significantly out of date and therefore are out of step with the trends over the past 8 years. The ESRI figures are now completely out of date and the NPF review should provide revised/increased population targets which will ultimately be incorporated into the regions and county development plans and LAPs/JUAPs.

The ESRI projections for the population and number of households indicate that the average number of people per household will decline from 2.81 persons per household in 2016 to 2.43 in 2040. It is important that the 2.4 figure is used in the calculation of housing need.

1.1.3 Regional Spatial and Economic Strategy 2019 (RSES)

Athlone is located within the Eastern and Midland Regional Assembly Area (EMRA) and Northern and Western Regional Assembly Area (NWRA), both of which are aligned in facilitating the sustainable and compact growth of Athlone as a Regional Growth Centre, defined below: *“Regional Growth Centres are large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area”*

Athlone is designated as a ‘*Regional Growth Centre*’ within the RSES with the aim to promote the sustainable and compact growth of the settlement by setting a population target of 30,000 to 2031. Regional Growth Centres are defined as *‘large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area’*.

Athlone is identified by the RSES as forming part of the ‘*Gateway Region*’ outside the Core Region which is a strategic inter-regional portal to the Northern and Western and Southern Regions. The town’s strategic location in the centre of Ireland as a gateway to the west between Dublin and Galway is also recognised.

A Growth Enabler for the Gateway Region is noted as follows: *‘Support continued growth of Athlone, with a focus on quality of life and securing the investment to fulfil its role as a key Regional Growth Centre and economic driver in the centre of Ireland’*.

Specific to Athlone, the RSES states that in respect of residential development:

‘Key to the success of Athlone is the availability of zoned and serviced lands within the existing built up area to facilitate significant population growth. The development of lands at Curragh Lissywollen, Lisseywollen South, Cornamagh, Cornamaddy and Monksland / Bellanamullia, have the potential to deliver the population targets identified in the RSES... Vital to the growth of Athlone as a Regional Centre is the provision of high quality, well designed housing development that ensures a mixture of housing types and meets the needs of a variety of households.’

Regional Policy Objective 4.8 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 sustainable compact growth targets of 30% of all new homes to be built within the existing built up urban area.’

The RSES is supportive of the ‘10 minute’ settlement concept, where by a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.

Notwithstanding the existing quantum of zoned land within the development boundary, the levels of population growth, to date, appear not to be meeting the targets set out in the County Development Plan 2021. In this regard, it is important that the Planning Authority provides sufficient zoned land over and above the population targets set out in the core strategy as any shortfall in the delivery/development of zoned land due to infrastructure (access servicing etc.) or other market reasons, will result in a shortfall in the targets set out in the County Development Plan.

1.1.4 Development Plans –Guidelines For Planning Authorities (July 2022)

While the submission relates to a Joint Urban Area Plan, the Development Plan Guidelines set out important guidance for the zoning, identification of land use strategies and phasing and sequencing of development. This is of relevance, as the local area plan is setting out the zoning framework and overall form of the Regional Growth Centre of Athlone.

A clear methodology is provided for the preparation of the housing demand and zoning requirements across all settlements within the planning authority area. In particular, a settlement capacity audit will therefore comprise housing estimates for tier 1 and tier 2 services lands.

The Guidelines note that *“It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.”*

Section 4.4.3 of the Development Plan Guidelines (DPGs) recognise that additional land should be zoned over and above the projected housing demand for that settlement where it is stated:

*“In providing housing sites for development within settlements, **it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement.** This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.” (JSA emphasis added)*

The DPGs confirm that after identifying the site/land requirements to meet a housing supply target for a settlement, the Planning Authority may also identify additional sites/lands to *“ensure sufficient choice for development potential is safeguarded.”*

*“In making provision for housing within settlements in the core strategy of a development plan, in certain instances a planning authority may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. This means that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, **may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded**” (JSA emphasis added)*

To ensure sufficient provision of housing land/sites, the DPGs outline that the Planning Authority should determine which zoned lands and sites in excess of that required to match the agreed housing supply target are provided where they state:

“Accordingly, on a settlement basis, the precise extent to which zoned lands and sites in excess of that required to match the agreed housing supply target are provided, is to be determined by the planning authority.”

The Guidelines explain that in providing housing sites for development within settlements, it may be necessary to zone **more serviced land** and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement.

The Guidelines note that it is not the purpose of the planning system and the development plan process to facilitate the hoarding and speculation of serviced development land.

However, it is recognised that there is a need for some degree of competition and choice in the residential development land market and to ensure a future pipeline of well-located serviced land.

This approach in the Guidelines identifies that a degree of choice in development sites is desirable to avoid restricting the supply of new housing development through inactivity (or hoarding) on a particular landholding or site.

The JUAP may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. The result of this is after identifying the site/land requirements to meet the housing supply target for Athlone, the JUAP may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded (and ultimately the overall targets are met).

The Guidelines provide, unequivocally, that planning authorities may provide zoned land **in excess** of that required to meet identified six-year targeted housing need (over and above the population headroom) and that land that is zoned in an existing plan and is serviced should not be dezoned.

It is respectfully submitted that the JUAP for Athlone should ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the JUAP.

Having regard to the above, it is important that the newly prepared draft LAP does not constrain the delivery of housing and that the new plan incorporates '*additional provision*' of zoned residential lands to appropriately adjust to updated population figures and housing targets, as required, allow for sufficient development choice during the plan period and for any potential unprecedented and inflated population growth into the future, as provided for by the Development Plan Guidelines.

1.2 POPULATION GROWTH



The Strategic Issues Paper identifies a population increase of some 7,131 persons between 2022 (22,869 from the Census 2022) to 30,000 in 2031. This requirement has derived from the population projections contained within the National Planning Framework 2018. It is respectfully submitted that it is particularly important to factor in actual population growth rates which have occurred since the preparation of the NPF which is based on the 2016 census data and as outlined above are out of date and will be updated as part of the NPF review due to conclude (in April 2024) during the timeline of the JUAP preparation.

The NPF predicts that population growth nationally will grow by 900,000 from 2016 at an average annual rate of c. 0.9%, however noting the higher level of in migration, the framework sets out a target to accommodate a population increase of 1.1m by 2040 with an average growth rate of 0.96% p.a. over the 24 year period.

The recent publication of the 2022 Census data has shown that for the first time in 171 years, Ireland's population has exceeded the five million threshold, reaching 5,149,139 people, an 8% increase since April 2016. This is a growth rate of approximately 1.3% annually over the 6 year period.

It is noted that the population of Athlone (as per table 2.6 of the Westmeath CDP) 21,349 was persons in 2016 rising to 22,869 persons in 2022, representing an increase of 7.1% over the period. The JUAP identifies an increase of some 7,131 persons (or a 31% increase) over a 9 year period. This level of population increase will require substantial investment in infrastructure, (social, community and services) as well as a significant amount of residential/mixed zoned land to cater for and meet the required targets set out in the core strategy.

Population and Migration Estimates, April 2023 – Published 25th September 2023

The 'Population and migration estimates for April 2023' were published on the 25th of September 2023 by the CSO.

In the 12 months to the end of April 2023 the CSO estimate that:

The population rose by 97,600 people which was the largest 12-month increase since 2008.

There were 141,600 immigrants which was a 16-year high. This was the second successive 12-month period where over 100,000 people immigrated to Ireland.

The report sets out that:

- Estimated population was 5.28m, an increase of 97,600 in 12-months. The largest 12-month increase since 2008.

- 141,600 immigrants into the country, second highest on record (151,100 in 2007), with net migration of 78,000 (again second highest on record with 2007 being 104,800)
- 64,000 emigrants, 14% increase year on year and highest since 2016.
- Amongst Irish citizens, negative net migration of -900. Second successive year of negative net Irish migration. Between 2017 and 2021, each year saw positive Irish net migration.
- Natural Increase (Births minus Deaths) was 20,000, its lowest level since 1997.

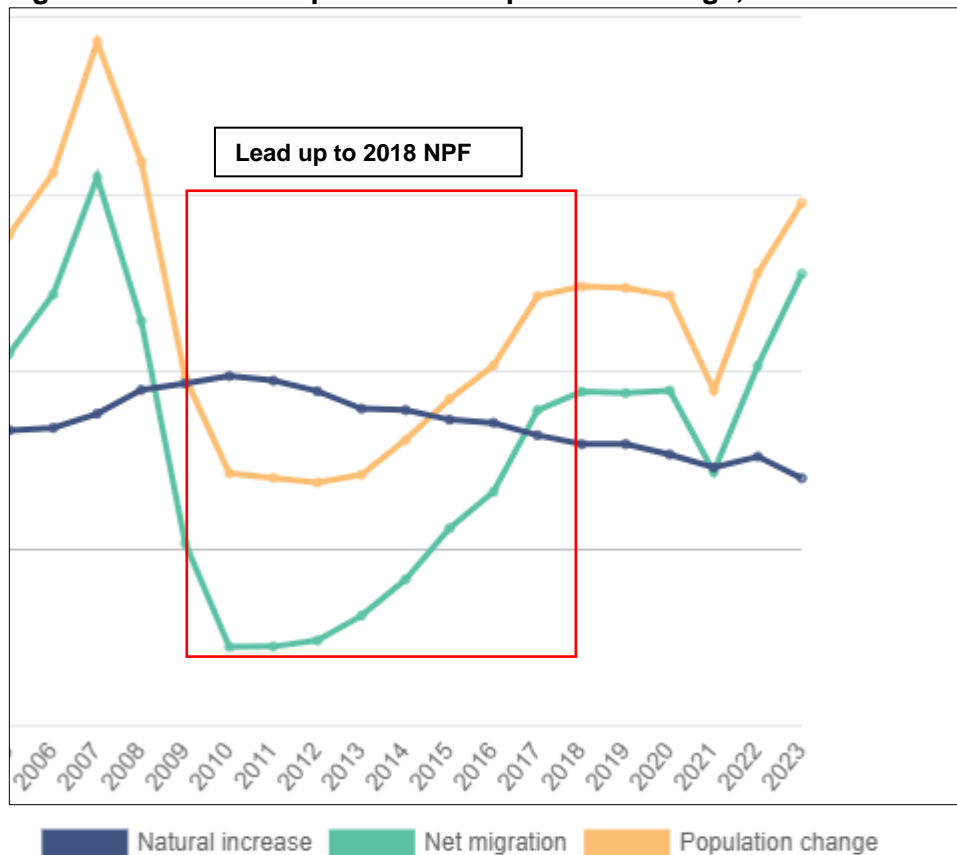
The CSO state that

"Ireland's population was estimated to be 5.28 million, rising by 97,600 people in the year to April 2023. This was the largest 12-month population increase since 2008 when the population rose by 109,200."

The publication of the NPF was based on a trend of population growth which was framed by lower population increases than has been apparent for the past number of years, with low levels of net migration and lower levels of population change. It is submitted that the population growth is above the higher end estimates included in the (now out of date) NPF Implementation Road Map 2018.

Clearly the figures in the NPF are significantly out of date and do not reflect the much higher than anticipated population growth in recent years and the onus is on Planning Authorities to plan for future growth, particularly in locations with access to sustainable transport, education, and services.

Figure 1: Annual Components of Population Change, 1988 – 2023



Source: Population and Migration Estimates, April 2023

The National Development Plan in 2023: Priorities and Capacity (January 2024) - ESRI

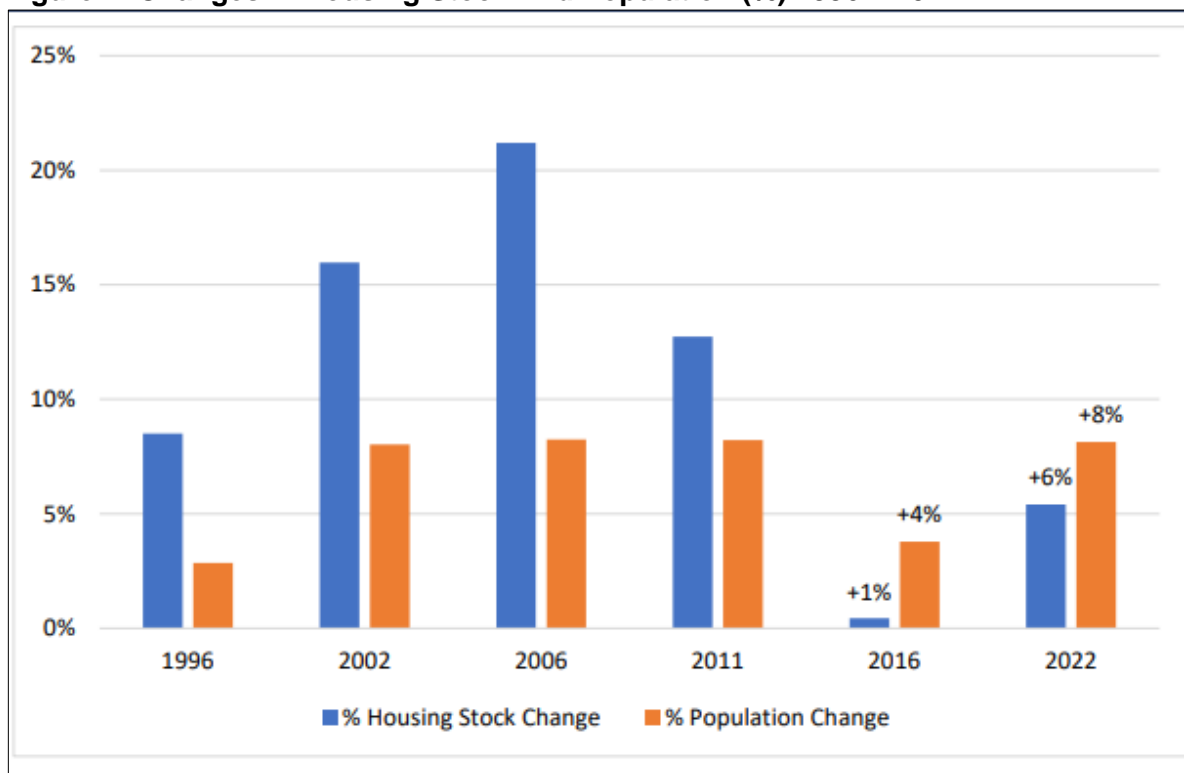
While the ESRI report does not provide an annual figure of housing supply that may be required, the ESRI do state that a key point to emerge on housing is the likelihood that existing targets for housing supply might understate need, given the stronger than expected increase in the population seen in the recent release of results from Census 2022.

The ESRI note that *“While housing supply in the Irish market has increased over the last number of years, it is clear from the continuous increases in rents and house prices that housing demand is still increasing at a faster pace than supply.”*

The ESRI quote a study by Conefrey and Staunton (2019) which shows that the estimate of demand increases from 34,000 units to 47,000 units a year if the assumption is made that headship rates (household size) in Ireland approximate to those of the UK over the forecast period in question and further note that the *“estimate of structural housing demand will be revisited in 2023 Quarter 4 when all of the relevant demographic data from the latest Census can be incorporated. These new data will almost certainly see an increase in the estimate of structural demand. Therefore, any imbalance which previously existed will now be greater due to the higher demand estimate.”*

The ESRI outline that *“Population growth overall has been higher than expected. In fact, the rate of growth of the population exceeded that of the housing stock in 2022. While it is not possible to quantify the potential changes at this stage, it is very likely, given the preliminary data from the Census, that the revised estimates of structural demand will be somewhat larger than the existing ones.”*

Figure 2: Changes In Housing Stock And Population (%) 1996 – 2022



Source: Figure 3.3 The National Development Plan in 2023: Priorities and Capacity ESRI Report 2024

With reference to the Housing for All housing targets the ESRI state that the current figure of 33,000 per annum is too low highlighting that:

“A key policy target within Housing For All is that of 33,000 units per annum. It now appears likely with more up-to-date demographic data and given the increase in inward migration particularly associated with the war in the Ukraine, that this figure is too low and will likely be revised upwards.”

While recent reports suggest that the numbers of new dwellings is close to 33,000 per annum, while welcome, is considered to be below the actual need and the pent up demand of the under-delivery of housing over a 8-10 year period.

1.3 EXISTING HOUSING SHORTFALL

In tandem with population growth, one of the key informers to determine the estimated number of houses required in the county and in turn, in Athlone, is household size.

It is therefore vitally important that the new JUAP considers the most up to date and relevant population and housing data available and the NPF household size figure of 2.4 per household.

As reflected in the 2022 census data and discussed above, the under-performance in the actual delivery of housing stock has led to over-crowding i.e., more people living in houses where they do not wish to (adult ‘children’ staying in the family home, single people ‘house sharing’ for example).

The National Planning Framework forecasts an average household size of 2.4 by 2040. This is also considered high by western European norms and builds in ‘house crowding’ nationally for the future. For example, the figure for France is 2.2, in Germany it is 2.0 and in Belgium and Italy it is 2.3. The long-term trend of declining average household size in Ireland from 1966 (4.0) to 2011 (2.73), was reversed for the first time in 2016 (2.75). It was at 2.73 in 2022. This reversal has arisen as a result of housing shortages nationally, and the position is most acute in the Greater Dublin Area, which has the highest housing shortfalls and the highest average household sizes.

Shortfall in residential zoned land

Based on experience, completion rates of zoned land translating into housing is in the low 20-30% range meaning that if that continued to be the case (which is likely to transpire) then there would be a 70% shortfall in housing delivery and a consequent lack of housing delivered by Westmeath County Council which would be contrary to Section 95 (1) of the Act, planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential, to meet the requirements of the housing strategy.

The Plan does not take into account the time it takes in practice for land to come forward, obtain planning permission, obtain funding and be constructed (which can occur over a number of plans). It is considered that insufficient ‘headroom’ was applied in this regard.

Having regard to the above, it is recommended that the JUAP takes into account lower household figures (2.4) in calculating the number of units for the UAP lands.

2.0 SUBMISSION IN RELATION TO THE ‘REGIONAL GROWTH CENTRE’ OF ATHLONE

The policy in relation to the strategic role and development of Maynooth, as summarised above indicates that the town will have to accommodate a significant level of growth by 2031.

Our client welcomes the recognition in the Strategic Issues Paper that Athlone as a designated Regional Growth Centre has:

“significant scope to position the town as a dynamic hub for new and expanding communities, business and enterprise, sustainable transport, tourism and heritage as well as a platform for new joint initiatives between Westmeath and Roscommon County Councils.”

2.1 Population and Housing

The Strategic Issues Paper highlights that the *“Joint Urban Area Plan will have a strategic role in setting out sufficient amounts of land, including the identification of appropriate locations, to accommodate this population target and associated housing demand.”*

Our client supports the commentary in the Strategic Issues Paper with regard to compact growth, and the provision of 30% of new residential development on existing brownfield sites within Athlone and the delivery of liveable neighbourhoods.

Glenveagh is also supportive of the commentary in the Strategic Issues Paper that *“it is also a priority 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 alike and the prioritisation of universal designs, lifetime adaptability and energy efficiency measures.”*

Glenveagh is at the forefront of developing sustainable modern construction methods for new dwellings which will deliver high quality, high performance energy rated homes for future residents. In tandem with this, Glenveagh high quality designed schemes encourage permeability, connectivity and provide high quality open spaces integrated to the existing green infrastructure of an area.

Our client welcomes the recognition that established urban framework areas have the capacity to ‘cater for a significant extent of residential development in the Plan area’, stating:

“Established urban framework areas such as Monksland /Bellanamullia, Curragh / Lissywollen, Lissywollen South and Cornamagh, in conjunction with a range of potential opportunity sites, have capacity to cater for a significant extent of residential development in the Plan area.”

There is a need for rezoning of a significant quantum of land in Athlone for residential purposes to accommodate the targets indicated in the core strategy of the County Plans of Roscommon and Westmeath, including an appropriate level of headroom not only from a population perspective, but also in respect of choice of zoned lands to be developed in a sequential manner. It is submitted that the development management process can ensure that the overall core strategy is delivered and not materially exceeded over the lifetime of the JUAP but the crucial point is that there is sufficient zoned land to enable the timely delivery of much needed housing in appropriate locations.

It is noted that the build out of zoned land can be as little as 25%-40% of the overall zoned land of an LAP. Such a shortfall if extrapolated for the period to 2031 would result in a significant under performance with regard to the delivery of housing.

2.2 Sustainable Communities & Social Infrastructure

Our client is supportive of the recognition that the provision of sustainable neighbourhoods requires the delivery of commensurate social infrastructure in tandem with residential development.

This will be a key challenge in meeting the envisaged population target of 30,000 persons in 2031 for the JUAP area. The Strategic Issues Paper correctly recognises that liveable neighbourhoods “will set the foundation for delivering Athlone’s sustainable communities.”

Furthermore the design and layout of new residential development plays a key role in the provision of sustainable communities through the inclusion of open spaces, permeability and well designed schemes; all to encourage sustainability in modes of transport, in proximity to employment and services.

Our client welcomes the commentary in the Strategic Issues Paper that the Joint Urban Area Plan “*will set out a policy framework guiding the alignment of new development, sustainable transport modes and social / community infrastructure in order to ensure Athlone’s growth is balanced, socially inclusive with respect to culture and people and meets the current and future needs of Athlone’s neighbourhoods and communities.*”

Glenveagh have an excellent track record of delivering sustainable neighbourhoods in high quality living environments.

2.3 Placemaking and the Built Environment

Glenveagh is supportive of the commentary contained in the Strategic Issues Paper in relation to place making and the built environment, particularly in respect of incorporating more intensive development within the urban regeneration frameworks and the (now recently published) Compact Settlement Guidelines and their contribution to place-making and preparing the appropriate criteria for future developments.

Similarly Glenveagh welcomes the objective of achieving a quality built environment which is noted as being essential to supporting healthy communities, sustainable mobility, climate resilience, and overall, successful urban living. The fostering of a vibrant town centre as well as necessary day to day retail development will benefit the overall settlement of Athlone.

3.0 CONCLUSIONS

The principal points of our submission are as follows:

- Glenveagh Homes Ltd., welcome the preparation of the Joint Urban Area Plan for Athlone. This is an important policy document for the future development of Athlone which is a 'Regional Growth Centre' in the RSES for the EMRA.
- As set out in the Strategic Issues Paper, Athlone's central location, regional transport connectivity (e.g. road, rail and public services), established infrastructure such as broadband and accessibility to other large Irish markets, such as Dublin City and Galway, have contributed to the town's robust economic base and extensive catchment area. It is important that residential development is provided within the JUAP area to rebalance the resident workers to total jobs ratio of 1.591 (as per NPF Appendix 2), which was some 50% higher than the next settlement in the table for the Eastern and Midland Regional Assembly area.
- The 'Population and migration estimates for April 2023' were published on the 25th of September 2023 by the CSO. The CSO state that:
- *"Ireland's population was estimated to be 5.28 million, rising by 97,600 people in the year to April 2023. This was the largest 12-month population increase since 2008 when the population rose by 109,200."*
- Clearly the figures in the NPF are significantly out of date and do not reflect the much higher than anticipated population growth in recent years and the onus is on Planning Authorities to plan for future growth, particularly in locations with access to sustainable transport, education, and services.
- The Strategic Issues Paper identifies a population increase of some 7,131 persons (or 31%) between 2022 (22,869 from the Census 2022) to 30,000 in 2031. This level of population increase will require substantial investment in infrastructure, (social, community and services) as well as a significant amount of residential/mixed zoned land to cater for and meet the required targets set out in the core strategy.
- The Development Plan Guidelines 2022 explain that in providing housing sites for development within settlements, it may be necessary to zone **more serviced land** and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement.
- The JUAP may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. The result of this is after identifying the site/land requirements to meet the housing supply target for Athlone, the JAUP may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded (and ultimately the overall targets are met).
- The Guidelines provide, unequivocally, that planning authorities may provide zoned land **in excess** of that required to meet identified six-year targeted housing need (over and above the population headroom) and that land that is zoned in an existing plan and is serviced should not be dezoned. This is to reflect likely activation rates of housing completions over the period of the plan.

- It is respectfully submitted that the JUAP for Athlone should ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the JUAP.
- It is respectfully submitted that the draft JUAP fully recognises the existing housing shortfall and that it must incorporate the most recent and up to date information available in the form of the CSO 2022 Census data and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing for the Regional Growth Centre of Athlone.
- It is noted Section 95 (1) of the Planning and Development Act 2000 (as amended), planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential, to meet the requirements of the housing strategy and to ensure that a scarcity of residential land does not occur at any time during the period of the plan. The onus is on the Local Authority to ensure that there is sufficient housing supply and zoned lands.
- The new JUAP needs to take account of the time it takes for land to come forward, obtain planning permission, funding and for construction to be completed on site (which can occur over a number of plans). As such, sufficient 'headroom' for sites over and above that provided in population figures, needs to be provided in the JUAP to ensure consistency of supply to meet housing targets.
- Given the 'Regional Growth Centre' designation of Athlone, coupled with its strategic location and access to public transport, existing well established employment areas, and the requirement to provide sufficient zoned land to meet the overall core strategy for Athlone, it is respectfully submitted that the town can cater for an increased number of houses than proposed in the Core Strategy and the Issues Paper. This is a fundamental issue which needs to be addressed with the most up to date population information available.
- It is respectfully submitted that the draft JUAP for Athlone must incorporate the most recent and up to date information available in the form of the CSO 2022 Census data and provide an appropriate quantum of zoned residential lands to provide for much needed additional housing.

Yours sincerely,



John Spain

Managing Director John Spain Associates Ltd.