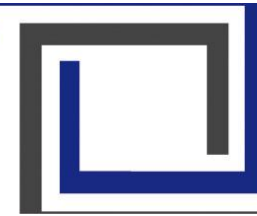


the planning



partnership

Submission in respect of

## ATHLONE JOINT URBAN AREA PLAN 2024-2030 PRE-DRAFT PUBLIC CONSULTATION

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**On behalf of**

**Portmore Trading & Investments Ltd.**

January 2024

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## 1 INTRODUCTION

### 1.1 Athlone Joint Urban Area Plan 2024-2030

We recognise that an update to the Athlone Town Development Plan 2014–2020 is long due and welcome the preparation of a new Joint Urban Area Plan to guide the proper planning and sustainable development of the town and its environs in the coming years.

#### 1.1 Key issues

Having carefully considered the Pre-Draft 'Strategic Issues Paper', we raise the following as being key parameters and priorities that can be integrated into the Local Area Plan's strategies, objectives, and actions.

	<p style="text-align: center;"><b>Scale</b></p> <p>The Athlone JUAP must adopt a holistic and long-term perspective, with ambitious, effective, and sustainable housing targets that accommodate the upcoming revision process of the National Planning Framework.</p>
	<p style="text-align: center;"><b>Flexible and Responsive</b></p> <p>The Athlone JUAP must be responsive to changing demographic conditions, including not only population growth but also the requirements of different household sizes and types and pressures affecting the housing market.</p>
	<p style="text-align: center;"><b>Compact Growth</b></p> <p>There must be an emphasis on delivering the right development in the most appropriate locations by targeting growth on a sequential basis and ensuring there is a sufficient strategic reserve of residential zoned lands.</p>

### 1.2 Additional supporting assessments

We recognise that a number of additional assessments and plans are mentioned in the Pre-Draft 'Strategic Issues Paper', such as the *Athlone Area Based Transport Plan* and *Athlone Urban Design & Regeneration Framework*. This supporting information will be vital to the final Athlone JUAP, and we respectfully request that their results (even preliminary findings) are clearly shown to inform the Athlone JUAP policies and objectives.

### 1.3 Structure

This submission is structured around the three key issues identified, as follows:

- **Section 1 – Introduction:** identifies the key issues and priorities that must be integrated into the strategies, objectives, and actions of the Athlone JUAP.
- **Section 2 – Scale:** Presents that the Athlone JUAP must adopt a holistic and long-term perspective for the strategic growth of Athlone, in recognition of its regional status and the changing national planning context.
- **Section 3 – Flexible and Responsive:** Presents changing trends at a local, regional, and national scale, to demonstrate why the Athlone JUAP must recognise and adapt to changing demographic circumstances.
- **Section 4 – Compact Growth:** Presents our views on the spatial development of Athlone in relation to the principles of compact growth.

Each section identifies the key questions raised in the 'Strategic Issues Paper' that are being responded to.

## 2 SCALE

### *Strategic Issues Paper – Key Questions*

*What are the strengths and challenges you associate with Athlone?*

*What initiatives should be considered to support Athlone’s role as a Regional Growth Centre?*

*What is your vision for the future of Athlone?*

*How would you define an attractive place to live, work and visit? Does Athlone meet those criteria, and if not, what is required to bridge this gap?*

*What are the Athlone’s key economic strengths and competitive advantages that this Plan should promote and safeguard?*

*What are the current constraints / challenges to attracting new, and expanding existing, business and enterprise in Athlone?*

### 2.1 Athlone’s status as a Regional Growth Centre

The Athlone Joint Urban Area Plan must focus on the town’s role as a Regional Growth Centre with close regard to the strengths, challenges, and opportunities associated with the town as described in the Regional Spatial and Economic Strategies of the Eastern and Midland Regional Assembly and Northern and Western Regional Assembly.

The EMRA RSES states that significant population and economic growth will be directed towards the key Regional Growth Centre of Athlone over the lifetime of the Strategy. We note and highlight the following extract from the EMRA RSES as being of particular relevance:

*Housing Supply and Affordability Housing supply in the Region has been slow in picking up from historically low levels during the recession. There*

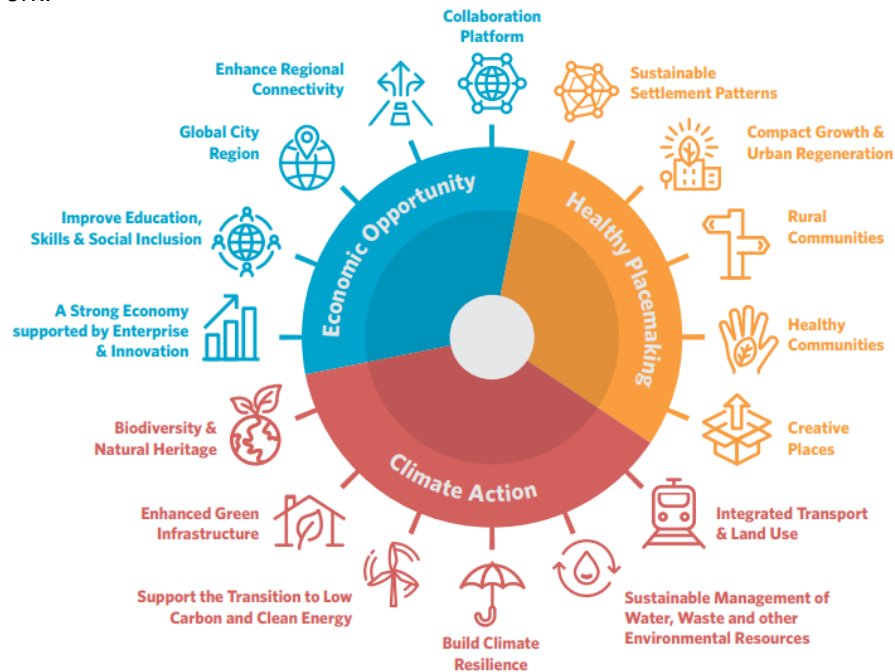
*is a further lag on the delivery of social housing which in turn is placing further pressures on the existing housing stock. Housing affordability and supply issues are impacting upon health and wellbeing, due to overcrowding, with people residing in substandard accommodation and homelessness. There is a need now for accelerated delivery of housing, particularly in Dublin and in identified growth settlements in the Region to ensure the development of high quality and affordable homes located within sustainable communities in order to meet the existing and future needs of a growing population.*

We raise the following key issues in relation to Athlone’s regional role:

- ❖ We understand the RSES vision for Athlone to act as the lead town in the Midlands, not only as a regional driver of economic growth and employment but also through its educational services. However, this economic role **must be considered alongside population growth and commensurate housing need.**
- ❖ As the population of Athlone is targeted to grow to at least 30,000 people by 2031, the town will need to accommodate a **significant increase in the quantity of housing supply,** in alignment with the principles of sustainable and compact growth.
- ❖ To meet the existing and future needs of a growing – and increasingly diverse – population, the Athlone JUAP must ensure that there is an **adequate diversity of housing types** provided in the town, and should not shy away from an oversupply in the market to provide the necessary flexibility in housing availability to benefit different household needs.

## 2.2 Enhancement of Athlone as a place to live and work

The Athlone JUAP must consider how it can best implement the 16 no. Regional Strategic Outcomes presented in the EMRA RSES, as align with the National Strategic Outcomes of the National Planning Framework, to ensure that Athlone continues to grow as an attractive and sustainable place to live and work:

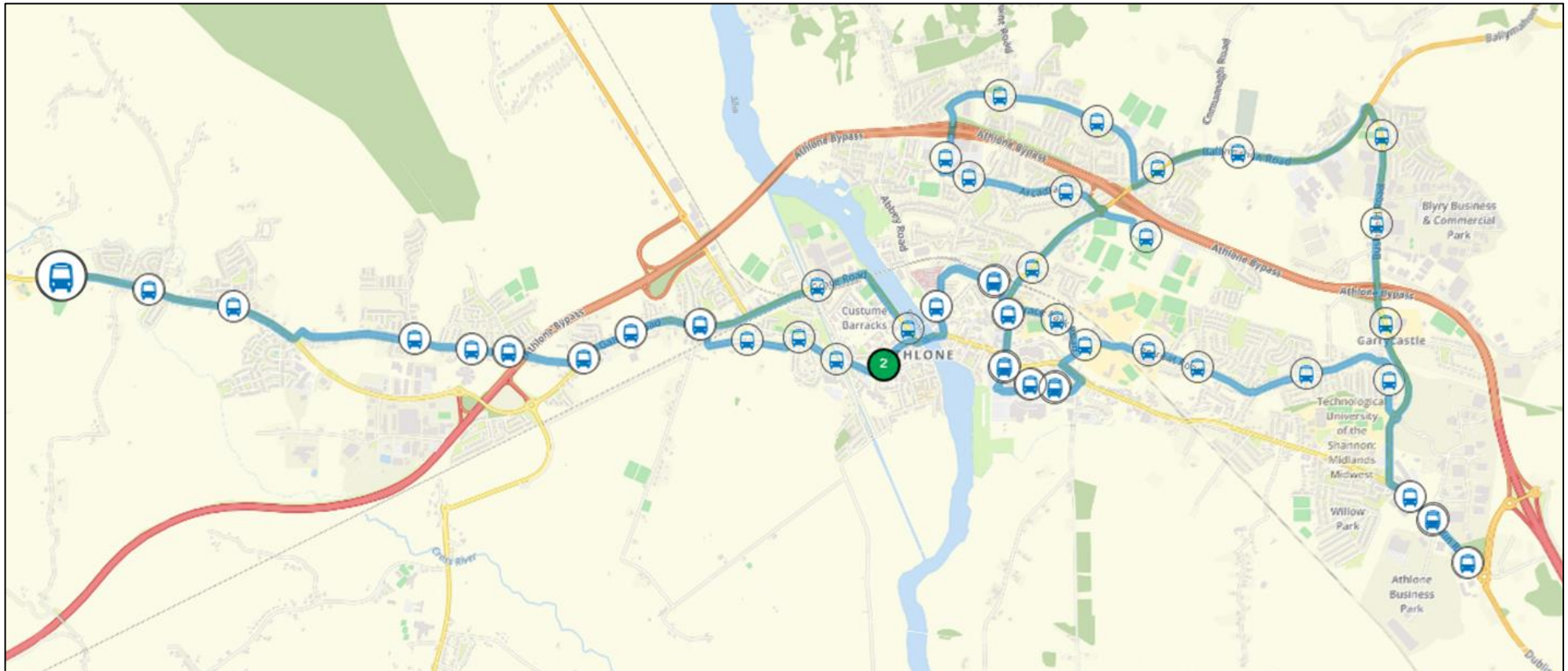


Source: EMRA RSES

We present that the following Regional Strategic Outcomes are of particular importance and must be prioritised in relation to the key issues raised in the previous section (i.e. population growth, housing need, a diversity of housing types):

- ❖ **Sustainable Settlement Patterns:** Athlone must continue to grow as a self-sustaining town, able to provide the necessary services, amenities, educational and employment opportunities, and most importantly housing supply to ensure that the population are able to live close to where they work and study without the need to undertake a lengthy and unsustainable daily commute.
- ❖ **Compact Growth & Urban Regeneration:** to build upon the previous point, the Athlone JUAP must ensure that the opportunities presented by underutilised land and buildings within the town are taken advantage of for the provision of high-quality housing, with such lands considered on a sequential basis with regard to their proximity to social and community services, and close enough to the town centre to encourage sustainable modal choice.
- ❖ **Healthy Communities:** the delivery of new housing must be directed towards locations that can facilitate and encourage active lifestyles, including walking and cycling, for instance by prioritising locations that would encourage active travel modes.
- ❖ **Integrated Transport & Land Use:** to further encourage sustainable modal choice, future housing must be targeted at locations that are served by public transport infrastructure to align transportation with land use planning. Athlone’s town bus service is Ireland’s first all-electric bus service, and its long-term viability must be supported by ensuring that a critical mass of population is targeted along its routes (see following page).

Athlone bus service routes A1 and A2 indicate locations where land use and public transport can be integrated to encourage sustainable modal choice.



Source: Transport for Ireland

### 2.3 Upcoming revision to the National Planning Framework

The Athlone JUAP must ensure that it is ready to accommodate changes in national policy and population projections which may come about by way of the future revision to the National Planning Framework.

For instance, it is recognised that the quantitative target of population growth and associated housing need, as well as the sustainable distribution of such growth in settlements across Ireland, have not sufficiently taken account of the impact of natural growth and net in-migration to Ireland. The Road Map for the First Revision of the National Planning Framework<sup>1</sup> recognises that, while preliminary Census 2022 results show that national population growth is broadly in line with the overall NPF population projections, **more than half of population growth is in the Eastern and Midlands Region**. Furthermore, it recognises that **significant net in-migration to Ireland** has led to an accelerated increase in population and pressure for accommodation.

Westmeath and Roscommon County Councils are surely aware of the housing availability and affordability pressures affecting Athlone:

- ❖ The critical situation faced by displaced persons, as seen in relation to the New Horizon Direct Provision site at Lissywollen, has shown that there must be more flexibility in housing options and capacity to absorb shocks to the market.
- ❖ The December 2023 *Locked Out of the Market* report produced by the Simon Community found that Athlone was one of the nine study areas that had no HAP properties available to rent in any household category within standard or discretionary limits.<sup>2</sup>
- ❖ The rental market is severely constrained, with desperately few options available to students. This has forced prospective students to defer or

decline college places or adopt wholly unsustainable commuting patterns.<sup>3</sup>

It is therefore essential that a strong case is made by Westmeath and Roscommon County Councils to **update the population projection and associated housing targets to better reflect the above pressures**, and to **provide more housing options**, to ensure that Athlone continues to present itself as an attractive, welcoming, and sustainable place to live, work, and invest.

<sup>1</sup><https://www.gov.ie/pdf/?file=https://assets.gov.ie/261206/107b5edc-533d-4f74-8c85-00763d457503.pdf#page=null>

<sup>2</sup> <https://www.simon.ie/e-publication/locked-out-executive-summary-december-2023/>

<sup>3</sup> <https://www.westmeathindependent.ie/2023/09/01/athlone-area-housing-crisis-hits-students-and-locals-in-perfect-storm/>

### 3 FLEXIBLE AND RESPONSIVE

<i>Strategic Issues Paper – Key Questions</i>
<i>What kind of housing / accommodation mix is required to address all sectors of our community?</i>
<i>How can health, well-being and quality of life in Athlone be improved for all communities and individuals?</i>
<i>Are the needs of different cultural, ethnic, youth, elderly and disabled groups being accommodated in our community?</i>












#### 3.1 Recognising the changing demography of Athlone

Vital to the future sustainable growth of Athlone as a Regional Centre is the provision of high-quality housing that ensures a choice of housing options are available that meets the needs of a variety of households. It is therefore essential that local demographic trends are recognised in the Athlone JUAP.

Recent years have shown that flexibility is required for the planning system to be able to respond to demographic change, migration, economic volatility, energy shortages, and climate change.

The Census 2022 results should be carefully considered at a local level to understand their significance for the policies and objectives of the Athlone JUAP. We have undertaken a preliminary analysis of key changes, as presented opposite.

The Athlone JUAP must ensure that it is able to **recognise and strategically adapt to changing circumstances**.

Census 2016 – 2022: Athlone		
 The total population has grown by 7.1%.	 The population aged 65+ has increased by 25%.	 Over 10% of the town's population aged 18+ live with their parents.
 The number of smaller households (1-, 2-, 3-rooms) have reduced <sup>4</sup> ...	 ... while the number of larger households (≥4-rooms) has grown. <sup>5</sup>	 25% of private households are occupied by one person living alone.
 Pre-school and early-school family cycle types account for 20.5% of all family types, while older couple and retired types account for 19%.	 Home ownership rose by 5.4%. The total number of households living in rental accommodation increased by 1.5%.	 The number of people at work in Athlone has grown by 17%, while the number of persons recorded as working mainly at or from home has grown by 49.4%.
 Travel by foot, bike, bus, train has grown by 7.6%, but...	 ... the use of private motor vehicles has also grown by 6.8%.	

<sup>4</sup> 1-room households -71%, 2-room -38%, 3-room -19%

<sup>5</sup> 4-room households 18%, 5-room 13%, 6-room 26%, 7-room 19%, 8- or more rooms 48%



### 3.2 The need for a resilient and responsive housing stock

The Census results indicate ongoing demographic pressures that will continue to affect Athlone in the coming years.

Even if enough houses are built to accommodate the current and projected population of the town, it is essential that housing delivery in Athlone does not focus on a single demographic (e.g. restricted only to a target based on population growth), but provides an appropriate range of types, sizes and tenures that reflects the diverse population of the town.

There is an urgent need to ensure that an appropriate range of dwelling sizes is provided in Athlone, so that the housing stock is resilient to existing and future pressures. We highlight the urgent need to provide smaller 1-, 2-, and 3-bedroom homes, so as to allow the sizable number of persons aged 18+ to move out of their parents home, and the continued provision of residential communities that serve the needs of young families and retired family types.

Specifically, the Athlone JUAP should ensure that appropriate house types are provided to allow independent, assisted and full care living for the elderly. Incentivising mobility in the housing market through this “right-sizing” process could free up a significant quantity of homes for other families, while also addressing social isolation among households occupied by one person living along.

The Athlone JUAP must clearly present how its housing targets and associated quantum of zoned lands for residential development have been **calculated to accommodate both natural growth and net in-migration.** The Plan must facilitate and encourage the supply of a **suitable range of housing types to reflect the changing needs of different households over their full life cycle,** even if this exceeds the basic and restrictive single metric of population growth. This is essential for a flexible, responsive, and sustainable housing market.

### 3.3 Enabling infrastructure

We recognise and support that Westmeath and Roscommon County Councils will actively engage with external stakeholders, such as Uisce Éireann, the ESB and Gas Networks Ireland, and the work they provide to allow future development to progress in a sustainable manner.

We also give our full support to the recognition that the development of “liveable neighbourhoods” will serve as the foundation for delivering sustainable communities in Athlone. Such neighbourhoods must provide a mix of adaptable and inclusive housing options and social / community infrastructure that appropriately reflect the demographic picture of Athlone and enable people to remain in the locality over their full life cycle.

The value of existing and future investments in local infrastructure, including roads, water, wastewater, and social / community infrastructure should be fully taken advantage of in the Athlone JUAP. Infill and brownfield locations that are proximate to the town centre or public transport routes and already have the necessary supporting infrastructure should be prioritised for residential-related development in the revised land use zoning map.

Where neighbourhoods are already well-served by social and community infrastructure and public transport services, every opportunity should be taken to **maximise the viability and long-term sustainability of such services by ensuring there is the necessary “critical mass” of population living in the area,** e.g. through infill and brownfield development. In other cases, **existing residential neighbourhoods may need to be “retrofitted”** to ensure that they provide the necessary variety and quality of housing, amenities and social infrastructure that is expected of a modern, liveable neighbourhood.

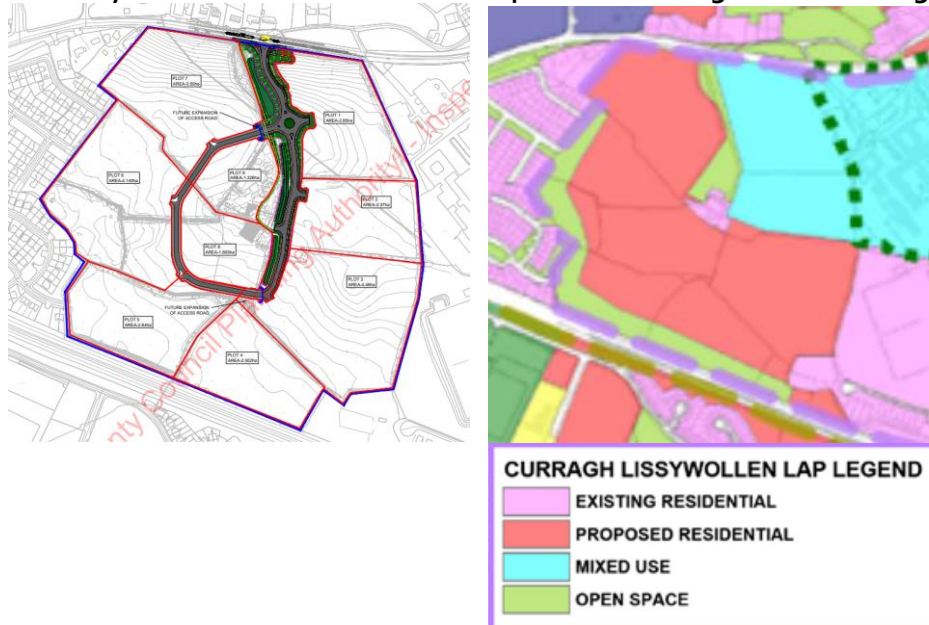


## 4.2 The need to update land use zoning in Athlone

We fully support that land use zoning is a fluid process, and that the objectives, priorities, and supported activities on a given piece of land are able to change over time to reflect wider planning, economic, and demographic changes.

For example, we note that the IDA have recently acquired a significant plot of land (28.37 ha) in Lissywollen, where they have lodged a planning application to enable its future development (Westmeath County Council Reg. Ref. 2360447). It can reasonably be assumed that the intentions of the IDA are to develop this land with an 'Innovation Technology' or 'Enterprise & Employment' use, rather than the 'Proposed Residential' and 'Mixed Use' that was the long-term strategy of the land per the *Curragh Lissywollen Local Area Plan* and *Athlone Town Development Plan 2014-2020*.

### IDA Ballymahon Road indicative masterplan and existing land use zoning



Source: Westmeath Co. Co. Reg. Ref. 2360447 & Athlone Town Development Plan 2014-2020

However, the Athlone JUAP must recognise that where land use does change, then the planned benefits of the original land use zoning objective must be achieved elsewhere. For example, to quote the *Curragh Lissywollen Local Area Plan* [**our emphasis**]:

*As a significant area of undeveloped residentially zoned land to the northeast of Athlone Town and Environs, the Curragh-Lissywollen Plan Area **will play a vital role in the fulfilment of future housing needs for Athlone**. The provision of housing in this area is important in terms of pursuing the needs of the Westmeath County Housing Strategy and in supporting the strategic goals of the Regional Planning Guidelines.*

We note that the *Curragh Lissywollen Local Area Plan* anticipated a **total residential yield of 480-705 dwellings accommodating a potential population of 1280-1850 persons** in the 'Proposed Residential' zoned lands alone. Sufficient zoned lands will need to be found elsewhere to accommodate the 480-705 dwellings that appear to have been lost through the IDA's acquisition of lands at Lissywollen.

We also note the Census 2022 results that indicate a considerable increase in the number of persons recorded as working mainly at or from home. We believe that this trend should be reflected in the updated land use zoning of Athlone, i.e. the recognition that **a significant quantum of enterprise, commercial, employment, and other economic activities take place on lands zoned Residential**.

The Athlone JUAP should ensure that **the long-term planned benefits** of previous strategic plans are **achieved at alternative and more appropriate locations** where the original lands are no longer suitable.

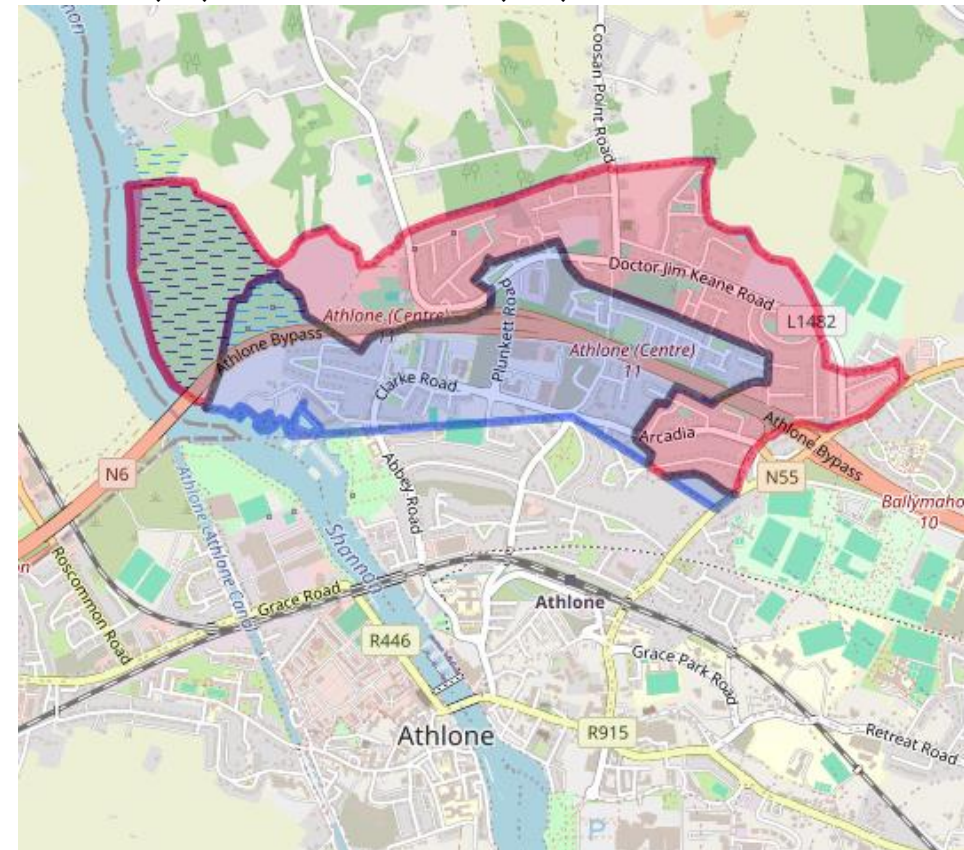
The land use zoning map has to prioritise the compact development of the town centre but ensure that zoning is **not overly restrictive to prevent the required flexibility in the market for long term and sustainable growth**.

## 5 CLONBRUSK-ATHLONE NORTH

The Clonbrusk townland and northern part of the Athlone townland represent a highly strategic and appropriate location in consideration of the points raised in this submission:

- ❖ The overall area contains a mix of existing residential neighbourhoods, social and community infrastructure (church, childcare, schools, primary care centre), and commercial / employment generating activities (Arcadia Retail Park, HSE).
- ❖ The area is well-connected, being served by the Bus Éireann A2 service, within 10 minutes cycle distance from the town centre, and proximate to the N6 for wider connectivity.
- ❖ The area contains a number of opportunity sites for regeneration, infill / brownfield development, and greenfield development, including residential development, to maximise the viability and long-term sustainability of the above services and ensure that a sufficient quantity and range of housing is provided to welcome new residents and allow existing residents to remain in the area over their full life-cycle.
- ❖ If the sequential approach is adopted in line with compact growth principles, this area can serve as a point of transition between the town centre to the south and a strategic reserve of zoned lands to accommodate future phases of growth at more peripheral locations to the north and northeast.
- ❖ As other areas of Athlone have been guided by previous Local Area Plans and Urban Design Frameworks, we believe that the Athlone JUAP should similarly consider the strategic development of the Clonbrusk-Athlone North Area – especially with regard to the viability of the Curragh Lissywollen Local Area Plan and potential loss of the planned residential yield therein (480-705 dwellings).

Clonbrusk (red) and northern Athlone (blue) townlands



Source: townlands.ie

Portmore Trading & Investments Ltd. is a willing landowner at a location that is highly appropriate for the development of a “liveable neighbourhood” in the Clonbrusk-North Athlone Area.

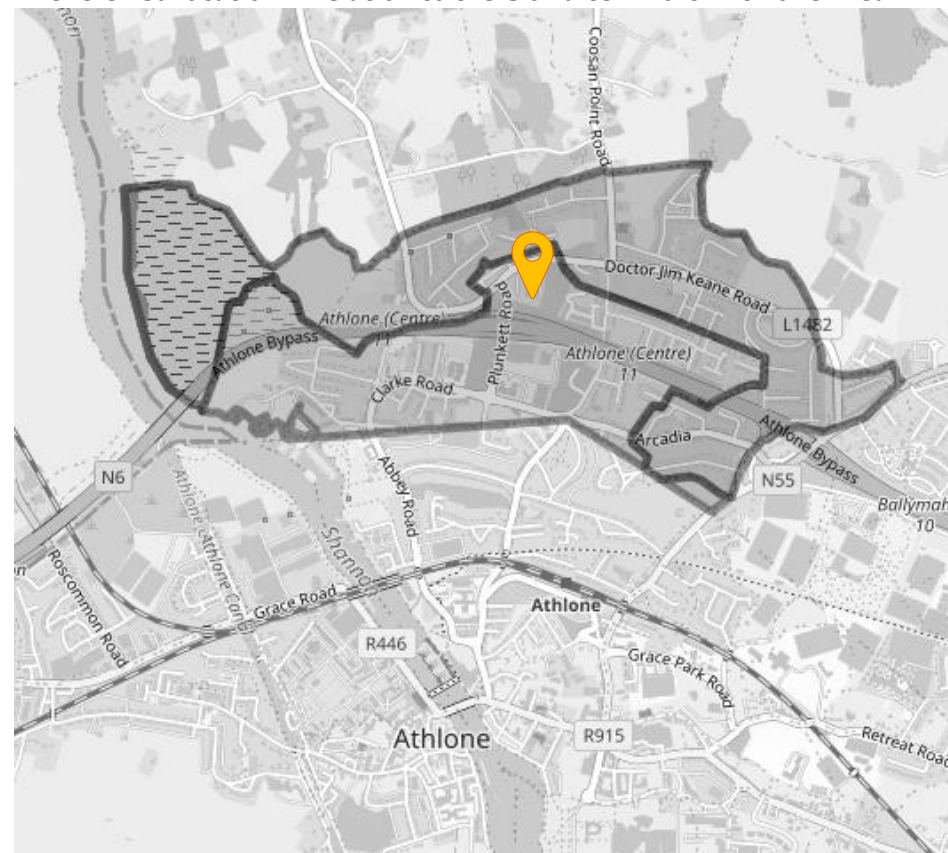
- ❖ The referred location is bounded by existing residential neighbourhoods, of which the logical expansion and enhancement would be highly appropriate.
- ❖ The location is well serviced, with excellent connections to the N6, adjacent to the A2 service bus stops on the L1482, within a ca. 8 minute cycle from the town centre, and within walking distance from a range of local social and community services and employment opportunities.
- ❖ The location represents an important opportunity for regenerative placemaking, to reinvigorate the public realm along the L1482 and L4023.

#### Views of the referred site along the L1482 (top) and L4023 (bottom)



Source: Google Street View

#### The referred location in relation to the Clonbrusk-North Athlone Area



While we understand that site-specific issues cannot be raised as part of the Pre-Draft ‘Strategic Issues’ process, we respectfully request that the draft Athlone JUAP considers the matters raised in this submission, and of the opportunity presented by the referred site, with regard to the potential for the regeneration, “future-proofing”, and long-term sustainability of the Clonbrusk-North Athlone Area.

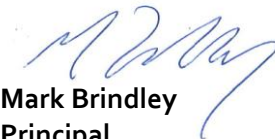
## 6 CONCLUSION

Portmore Trading & Investments Ltd. fully welcome and support the preparation of a new Athlone Joint Urban Area Plan to guide the proper planning and sustainable development of the town and its environs in the coming years. In response to the questions raised in the Pre-Draft 'Strategic Issues Paper', we believe that the following matters should be integrated into the Plan:

- ❖ The Athlone JUAP must focus on the town's role as a Regional Growth Centre by ensuring that economic growth and employment is matched with commensurate housing provision.
- ❖ Westmeath and Roscommon County Councils must make a strong case to update the population projection and associate housing targets of Athlone to better reflect significant pressures that are affecting the housing market, in light of forthcoming revisions to the National Planning Framework.
- ❖ The Athlone JUAP should be informed by the Census 2022 results beyond the simple metric of population growth, but recognise such trends as the ageing population, number of adults living with their parents, lack of supply of smaller households, and significant number of households occupied by one person living alone.
- ❖ The Plan will need to facilitate and encourage the provision of a significant increase in the quantity of housing in Athlone, while also encouraging mobility in the housing market by ensuring that there is an adequate diversity of housing types in attractive, liveable neighbourhoods.
- ❖ The spatial planning of Athlone should be directed by a sequential approach that prioritises sites that are infill, brownfield, and accessible to the town centre by active travel modes or public transport services.

- ❖ The Athlone JUAP will need to significantly update the land use zoning across the town to reflect the changing objectives, priorities, and supported activities of landowners, the Local Authorities, and other stakeholders. Where the uses of a given piece of land have changed from the original land use zoning category, the planned benefits of the original land use zoning objective must be achieved elsewhere.

We trust the above is of interest, and welcome further engagement with plan-making process when the Draft Athlone JUAP is presented.



**Mark Brindley**  
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