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**Submission to Westmeath County Council  
regarding the Draft County Development Plan 2021-2027**

**The submission is made by  
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of Commerce.**

**DRAFT**

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## 1 Introduction

This submission has been prepared on behalf of the Mullingar Chamber of Commerce in response to the published draft County Development Plan. The submission relates to the Core Strategy element of the written statement.

The submission is based on a concern of the economic interests in the town that the core strategy is deficient in terms of level of detail and that it underestimates the growth in population in the county that is likely to take place during the period of the Development Plan. The submission suggests a more realistic population projection that could be adopted. In this regard it is relevant to note that the town of Mullingar offers significant scope for employment development and housing accommodation. Population growth can be accommodated to achieve the national policy objective of compact urban growth.

Having regard to the level of Mullingar in the settlement hierarchy for the county, more detailed policies for both Mullingar should be included in the County Development Plan. The draft County Development Plan should include strategic policy objectives for the town of Mullingar rather than leave these to be determined in a Local Area Plan.

## 2 Core Strategy is Deficient

The development plan core strategy is set out in table 2.8 in the written statement.<sup>1</sup> The projected population increase for the town of Mullingar during the plan period is: 2768. This is based on an estimated 2021 population of 23,235 and a projected population in 2027 of 26,003.<sup>2</sup> However, the core strategy does not state how many houses are needed to accommodate this population growth or how much land is required to accommodate these houses. Table 2.8 suggests that these calculations will be done in the Local Area Plan to be prepared for Mullingar town.

In not providing this information as part of the County Development Plan, the plan fails to meet the statutory requirement of a core strategy as stated in the Planning and Development Act, 2000 (as amended). The Act states that the written statement of a development plan shall include a core strategy,<sup>3</sup> and that this core strategy shall, *inter alia*, set out details re the size of the area already zoned for residential use (or a mixture of residential and other uses) and the size of the area proposed to be zoned in the development plan. This information shall also provide the proposed number of housing units to be included in the area already zoned.<sup>4</sup> The draft County Development Plan does not provide this information.

As a result, the Development Plan provides no information on 'household size' or 'housing densities'. These are essential parameters in order to determine whether adequate zoned lands are available to meet the housing needs during the period of the new County Development Plan. While for the settlements other than Athlone and Mullingar, the table does provide the amount of zoned lands, no indication is given how these figures are arrived at. In this regard it is significant to note that the plan

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<sup>1</sup> Draft Westmeath County Development Plan 2021-2027, Westmeath County Council, Table 2.8, p. 52.

<sup>2</sup> Draft Westmeath County Development Plan 2021-2027, Westmeath County Council, Table 2.6, p. 33.

<sup>3</sup> Planning and Development Act, 2000 (as amended), Section 10.1A.

<sup>4</sup> Planning and Development Act, 2000 (as amended), Section 10.2A.

states: ...”*The amount and location of zoned lands required in each settlement was determined using an evidence-based settlement typology and asset-based approach, as detailed in Section 2.7.*”<sup>5</sup> The section 2.7 does not contain any information on household size or assumed densities.

### 3 Population Projections Are Too Low

The population projections for the county as a whole and for Mullingar and Athlone towns, are based on the figures contained in the Regional Spatial and Economic Strategy. These figures are in turn based on the guidance from the National Planning Framework. In the document ‘Implementation Roadmap for the National Planning Framework’ the following projected population figures are included for county Westmeath: 98,500 in 2026 and 102,500 in 2031. In both cases the high projections have been used here.<sup>6</sup> In the Regional Strategy for the Eastern and Midlands Regional Assembly area (EMRA) these figures have also been adopted.<sup>7</sup> However, the question can be asked: are these figures appropriate?

Table 1 shows the projected figures in the Implementation Roadmap for the three regional assembly areas for the years 2026 and 2031. This table shows that the National Planning Framework assumes that population in the Eastern & Midland Region will grow at a slower rate than the other two regions. The EMRA region would be expected to grow by 18 percent between 2016 and 2031 whereas the Northern and Western region would be expected to grow at a faster rate of 20% and the Southern region at a still faster rate of 22%.

Area	2016	2026	2031	Growth 2016-2031 (%)
Eastern & Midland Region	2,329,000	2,619,000	2,740,500	18
Northern & Western Region	847,442	986,500	1,014,500	20
Southern Region	1,585,000	1,820,500	1,928,500	22
State	4,761,442	5,426,000	5,683,500	19

Note: high projections.

**Table 1 – Projected Population under the National Planning Framework**

The reality is very different however. Since the third quarter of 2018, planning applications for residential developments with more than 100 dwelling units, go directly to An Bord Pleanála. During the year 2019 An Bord Pleanála granted 63 permissions for such developments of which the vast majority (50) were in the EMRA region. In terms of housing units 14513 out of 17427, or 83%, were granted in the

<sup>5</sup> *Draft Westmeath County Development Plan 2021-2027*, Westmeath County Council, p. 51.

<sup>6</sup> *Implementation Roadmap for the National Planning Framework*, Govt. of Ireland, July 2018, p. 13.

<sup>7</sup> *Regional Spatial & Economic Strategy*, Eastern and Midlands Regional Assembly, 2019, Appendix B.

EMRA region. In the first quarter of 2020, the figures were even more striking because of the 30 permissions, 28 were granted in the EMRA region with 96% of housing units granted permission located in the EMRA region with the remaining 4% in the Southern Region and no houses at all in the Northern and Western region. Details of the relevant planning permissions are contained in Appendix A to this submission.

What does this tell us? Simply that the EMRA region is growing at a much faster rate in terms of new housing planning permissions, than the other two regions. In contrast, the National Planning Framework figures suggest that the opposite should be the case: i.e. that the two other regions should grow at a faster rate than the EMRA region. This is clearly not happening. Because the number of housing units that are going to be built in the EMRA region in the coming years will exceed the number of housing units that will be built in the other two regions combined, the population in the EMRA region will also grow at a faster rate. This means that the population projections for the county (and also for the towns) that are adopted in the draft County Development Plan are too low.

#### **4 A More Realistic Population Projection for Mullingar**

What would be a more likely scenario? Based on the planning permission data presented in Appendix A, it is a conservative estimate that at least two thirds of the State's population growth during the period of the draft County Development Plan, will take place in the EMRA region. This is a conservative figure, given the fact that during 2019 and 2020 so far, more than 80% of housing units were granted planning permission in that region. New houses determine population growth. Where the houses are built, therefore determines where the population increase will occur.

Based on a 67% proportion of national population growth taking place in the EMRA region, the more realistic table for population projections at regional level would be as shown in table 2.

<b>Area</b>	<b>2016</b>	<b>2026</b>	<b>2031</b>	<b>Growth 2016-2031 (%)</b>
Eastern & Midland Region	2,329,000	2,774,254	2,946,779	27
Northern & Western and Southern Regions	2,432,442	2,651,746	2,736,721	13
State	4,761,442	5,426,000	5,683,500	19

**Table 2 – Projected Population Based on 67% of Growth in the EMRA Region**

Instead of a population figure for the county in 2026 of 98,500, a more realistic projection would be: 104,049. This is assuming that the proportion of the regional population that is located in county Westmeath, would stay the same. The difference of over 5500 people could result in an additional land requirement of 63 hectares of zoned land based on an average household size of 2.5 and an average density of 35 dwellings per hectare. The comparison between the two scenarios is illustrated in Table 3.

	<b>Optimistic Scenario</b>	<b>Realistic Scenario</b>
Population in the EMRA Region in 2016	2329000	2329000
EMRA population as % of State population in 2026	48	51
Population EMRA 2026	2,619,000	2,767,260
% of EMRA Population County Westmeath 2026	3.76	3.76
Population County Westmeath 2026	98,474	104,049

**Table 3 – Comparison Between Population Projections**

## **5 What Can Mullingar Deliver?**

Within the EMRA region Mullingar is well placed to accommodate additional growth in population over and above the figures contained in the draft development plan. Based on the more 'realistic population scenario' for the region as explained in section 4 of this submission, it is important that the draft County Development Plan reflects these realistic figures.

What makes Mullingar well placed to accommodate additional growth? First, Mullingar is well placed in relation to the jobs market in Dublin as travel times to key locations in the region are favourable. Second, by providing both employment and houses within Mullingar as a key town in the county, there is an opportunity to reduce long distance commuting patterns that would result from new residential developments in the outer suburbs of Dublin city and beyond. Third, providing housing in towns like Mullingar county Westmeath can provide an opportunity for a choice of living environments within the EMRA region.

There is a risk that sustainable residential development is considered synonymous with high density urban development. However, while high density urban living is increasingly popular and reflects the general trend of movements towards the cities, a significant number of households prefer a residential environment where the (real or perceived) disadvantages of city centre urban living are avoided and the attractions of easy access to recreational amenities can be accommodated. This

difference in priorities is also affected by the stage a household is in its lifecycle. It is therefore inappropriate to focus on one type of residential environment alone. Not every family is willing to live in an apartment even if the quality of the apartment can be improved from standards in the past. The key to successful cities is that different environments can be provided, allowing for choice. However, all environments need to be high quality. This can be achieved by good design (sustainable neighbourhoods) and good transport accessibility.

Towns like Mullingar can make an important contribution to the demand for high quality residential environments. In addition, Mullingar can offer a number of opportunity sites, some of which have been highlighted in the Local Area Plan which is now expired. However, these are key sites that should be mentioned in the County Development Plan, rather than waiting for a Local Area Plan for the town. The following six key opportunity sites are identified:

- Columb Barracks
- Lough Sheever Corporate Park
- Forest Park Business Campus
- Business and Technology park Marlinstown
- Blackhall Car Park
- Belvedere House and Gardens

Appendix B provides a brief description of each of these sites. The opportunities of these sites for employment and mixed use developments should be identified in the County Development Plan rather than be left to a Local Area Plan.

## **6 Conclusion**

- **The Core Strategy in the Development Plan fails to meet the minimum statutory requirements as set out in the Planning and Development Act, 2000 (as amended) because it fails to provide information about the zoned lands capacity for housing development for Mullingar and Athlone.**
- **The population projections for the county as a whole and for Athlone and Mullingar, are too low and fail to reflect the concentration of housing planning permissions within the EMRA region.**
- **A more realistic population projection for the county could easily result in an additional need for housing land of min. 63 hectares. The draft County Development Plan should indicate the location of some of these zoned lands in Mullingar rather than leave it to a Local Area Plan.**
- **Mullingar offers good opportunity sites for employment and mixed use developments. These sites should be identified in the County Development Plan rather than be left to a Local Area Plan.**

## **Appendix A – Planning Permissions for Strategic Housing Developments**

To be added.

## **Appendix B - Opportunity Sites in Mullingar**

### **Site 1: Colum Barracks**

This centrally located opportunity site is zoned a 'major regeneration opportunity site' in the current Local Area Plan for Mullingar. It is one of the most historic locations in the town. The opportunity to develop this site was recognised in the expired Local Area Plan but has not yet happened: ...*"The Council will cooperate with the relevant landowners, in conjunction with investors and government agencies, in the preparation of Regeneration Plans for both Columb Barracks and attendant lands and St. Loman's Hospital and attendant grounds, in order to investigate future options with a view to securing viable alternative uses and the creation of sustainable employment opportunities."*<sup>8</sup> The County Development Plan should include an objective to review the development opportunities of this site and identify how stakeholder groups can make a viable regeneration plan happen.

### **Site 2: Lough Sheever Corporate Park**

This site was zoned 'enterprise and employment' in the current Local Area Plan for Mullingar. It represents the most recently developed and successful business park in the town, attracting national and international occupiers. The development potential was recognised in the Local Area Plan: ...*"Lough Sheever Corporate Park is a 50 hectare established mixed use development providing high specification business units, commercial facilities together with warehousing and distributions units. There is approximately 12ha of land available for enterprise use within Lough Sheever Corporate Park."*<sup>9</sup> The County Development Plan should include an objective to designate it as an opportunity site for employment.

### **Site 3: Forest Park Business Campus**

This site was zoned 'enterprise and employment' in the current Local Area Plan for Mullingar with recognised qualities in terms of location and access: ...*"Forest Park Business Park offers a mix of office units and industrial space. It is considered that a range of general industrial types and services would be appropriate within this extensive Industrial Park, which has high quality road links with access to the C-Link/N52 and M4 road networks."*<sup>10</sup> The County Development Plan should include an objective to designate it as an opportunity site for employment.

### **Site 4: IDA Ardmore Business and Technology Park Marlinstown**

This site was zoned 'innovation technology' in the current Local Area Plan for Mullingar. It forms part of the Ardmore/Marlinstown Framework Plan and has been identified as IDA Business Park. The County Development Plan should include an

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<sup>8</sup> Mullingar Local Area Plan 2014 – 2020, Volume 1, p. 113.

<sup>9</sup> Mullingar Local Area Plan 2014 – 2020, Volume 1, p. 40

<sup>10</sup> Mullingar Local Area Plan 2014 – 2020, Volume 1, p. 40.

objective to designate it as an opportunity site for science and technology based employment.

#### **Site 5: Blackhall Car Park**

This site was zoned 'mixed use' in the current Local Area Plan for Mullingar. It provides a prime development site within the town centre where development has not yet happened although it was identified for regeneration in the current Local Area Plan: ...*"This area is to the south of the Retail Core, and is bounded at its southern end by the railway line and by the rear of Lynnbury Terrace. The mainline rail station on the Sligo/Dublin line is at the western end. A large part of the area currently comprises surface car parking."*<sup>11</sup> The County Development Plan should include an objective to designate the site as an opportunity site for mixed use development incl. medium to high density housing, retail and business as well as social and cultural uses.

#### **Site 6: Belvedere House and Gardens**

This site is located ca. 5 km to the south of the town with good access from the N52 national secondary road. Subject to a feasibility study, the site presents an opportunity site for tourism development. The site could thus provide a considerable tourism attraction in one of the most picturesque locations in the County. The County Development Plan should include an objective to designate the site as an opportunity site for tourism related development.

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<sup>11</sup> Mullingar Local Area Plan 2014 – 2020, Volume 1, p. 59.