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 Roscommon County Council,  
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 F42 VR98



“Proposed Variation No. 2 to Monksland/Bellanamullia (Athlone West) Local Area Plan 2016-2022,”

Submission: By Donal Kenny Carrickobrien Athlone County Westmeath 13/3/2019

The Draft Athlone Joint Retail Strategy is a statistical report on the eventuality's particularly in the Athlone West area, it should be an aid to management of the retail environment in respect of forward planning, but rather than advocating any future vision or any criticism of the area, the study rambles in broad analysis of the catchment population and shopping trends, all of which are aligned to the latest Monksland/Bellanamullia Athlone West LAP 2016-2022, this LAP commissioned by a department with a profoundly different agenda, a singular approach rather than the joined perspective, which ultimately should be in place in the form of a Joint Area Plan. It may be that the objective of this new Retail Strategy is lost, because it may be that major Retail proposals in M/BLAP would be frustrated without such statutory governance, that the M/BLAP depends on the Athlone Joint Retail Strategy to function, But there is something lacking about the situation. It cannot be denied The LAP was constructed lacking due diligence, as the RCC disregarded this fundamental aspect the Joint Retail Strategy. It may appear this new Joint retail strategy is necessary to validate the LAP, In this respect, it's like certifying a new house, without a snag list, what about the rooms with no doors, the holes in the floors.

The issuing of this template for an area that has formerly evolved since the turn of the century is short change for active investors, those who have invested in and created the diversity of the urban area that Monksland/Bellnamullia Athlone West has become. The new Athlone Draft retail Strategy, a Strategy which is choreographed by an inept and flawed LAP, this in an aftermarket retrofit attempt to validate the inapt objectives of the LAP, a plan that has undermined consolidation and enhancement of the built/residential environment in favour of consolidating flagship retail driven enterprise. This New Draft Retail Strategy has one strategy, to add credibility to a deficient LAP. The LAP which undermined proficient investment in both retail and residential development, undermined developments creating infrastructure and access to the remainder of residential development lands, in favour of cascading the most affluent forms of Flagship retail operators to sites that are of extreme strategic importance for Flagship corporate Job creating companies. The new draft retail strategy attempts to reconcile the policies of the LAP. Policies such as, those set out under page 16 Athlone West B/M LAP, and pages 4,5 draft Athlone Joint Retail Strategy, (set out below), the LAP has squandered one of the most prestigious corporate sites, the Hannons Quarry site for convenience, which is not in keeping with the trend in that area, the LAP attempts to militate the extremity of this controversial zoning initiative by cropping in an amenity park. Neither

of which is appropriate given the road frontage and traffic concerns. This high-density retail zoning which was shunted through in an alteration to the LAP is against the principles of planning, neither consideration, practicality, or evidence basis have been implemented, this in total disrespect of the planning Acts. It is in conflict with recent planning decisions and directions of An Bord Pleanála, the increase of District Centre zoning conflicts with the Roscommon County Development Plan and the attempts to promote the agenda as a consolidation of District Centre uses are as remote from the truth as one can get. The LAP undermined the convergence of the existing River Village Centre with the associated District Centre Lands at the Old Tuam Road Junction. This area had been promoted as such, the combined Centres at the Old and new Tuam Roads, also having attracted substantial investment as a consequence of this status. For the Planning, department to invent a new meaning for consolidation by removing the critical zoning from the Old Tuam Road Junction lands and relocating it on a footprint 4 times greater, this 30 metres adjacent, yet more remote to the existing centre and residential areas is as farcical as Planning Policy can get. The abstract below indicates the LAP is in conflict with its own policy's, as the plan has targeted the foremost opportunity site for convenience, This may well conveniently set the cement mixers rolling, but it may well be, the full extent of development of the area attributed to this flawed plan.

#### 4.2 OPPORTUNITIES

##### "4.2.5 Economic Development and Employment"

"• Strengthen the links between the Monksland / Bellanamullia area and Athlone and the Midland Linked Gateway towns<sup>3</sup> in order to foster opportunities for new commercial activities, for example, within the industrial and business sectors.

- Create a strategic reserve of new industrial and enterprise lands in the area and encourage the provision of flagship enterprises, micro-enterprises, telecommunications and ICT Infrastructure.
- Promote Monksland / Bellanamullia as a desirable location for targeted economic investment and as a primary centre for the location of industry and enterprise development.
- Prioritise the reuse of existing vacant industrial, business, light industrial and warehouse units."

"4.2.6 Retail and Commercial Development • Providing a central focus for the area by designing a single District Centre within the LAP area. • Promote the uptake of existing vacant premises, where appropriate, in conjunction with the development of the District Centre."

In relation to 4.2.5 above, the LAP changed the zoning on the most affluent and strategic industrial/enterprise lands situated in circa 16 acres of Hannon's Quarry to retail. It may be envisaged that Flagship Corporate enterprise doesn't require the type of profile site that a McDonald's restaurant prefer, but the reality is the site lends itself to multi-story development on account of its profile in the area, the land/ground conditions suit such a development, not only is the streetscape set by the presence of the primary care centre, but simply because high street corporate entities would not be encouraged or consider a site with less profile. This change in zoning has more far-reaching implications, such as access and traffic, amenity with no amenity on the busiest road in the area.

The New Athlone Draft Retail Strategy's primary concern and its implications are steered at Athlone West and it is a consequence of the affluence of the Athlone West area, that the actual document exists. It has failed the area. It should be an independent micro-assessment of this active area, but instead it placates policy's with no beginning or no end, these are aspirations muddled together to

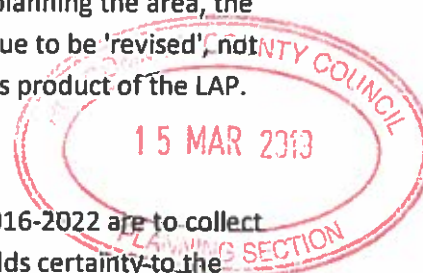


engage developers in the area as soon as possible, collect what we know has been invested in, what's viable and stick them all together, Let's call it consolidation, get construction going, create jobs and have a central space with some insignia, like we are making your area great?, ?/use all available funding/grants /European structural funds/regional/national and county to forward the production. Reality is in the detail, opportunity is by nature opportunity. To circumvent opportunity and call it a plan is a travesty, one, only the people with discretion on policies could combine. The future is staring everybody in the face, only they are in apathy, believing the that some higher order is governing or steering such administrative decisions, but how fickle a device is this new "draft", the initial format of the area, in 'draft' LAP was changed in(60 days) in a manner that defile's not only defies logic let alone strategy in planning. A 16-acre amenity area was changed to high density urban, without the blink of an eye? this was a considered approach to planning the area, the planning acts recommend at least 12 months before the initial plan is due to be 'revised', not replaced? Interestingly this 16 acre alteration action, accounts for gross product of the LAP.

Consolidation: A flawed Policy,

The full attributes of the Athlone West Bealnamullia/Monksland LAP 2016-2022 are to collect credible ventures and consolidate these with a planning agenda, this adds certainty to the developers and the investors. This would be an amicable occurrence, but for the circumstances, these entities had been formerly evaluated/invested in and proposed since 2012, These previous proposals were on the core zoned areas for such activity's. The Roscommon County Council accepted flawed misrepresentation of the population, oversupply and false vacant buildings accounts to redesign the retail scope in the area, this was also facilitated by an ambiguous term in the development plan indicating the development of a district centre in Monksland. the planners of Roscommon County Council used this terminology, suggesting it was a single entity, but what they disregarded was the fact that the RCC Development 2014-2020 was Formulated after the 2010-2016 LAP, and both the 2016 LAP and the RCC Development Plan acknowledge/ report that the "District Centres" in Monksland consist of option 2 and 3, the combined centres at the Old and New Tuam roads, ( The River Village Centre and AKA Mulligan's Field).

This new draft Athlone Joint Retail Strategy lacks objectivity, If it was an accurate appraisal, it would state clearly that there is an undersupply of convenience shopping in the Athlone west area and residents have to travel to the opposite side of Athlone, via the motorway or through the centre of Athlone for necessity shopping. It can be established that the average trips are twice weekly and many use taxis for their weekly shopping needs. The new Draft should clearly indicate that there has been an under-investment in convenience construction in the area, particularly as the population now equals that of Roscommon town, that there are no building suitable for supermarket operations. That planning applications for business enterprise/retail warehousing should be restricted because there is currently circa 8600 Sqm vacant. This is not information outside the scope of the Retail Strategy. But Although the LAP reports that in excess of 8600sq m of B/E is Vacant and against the defined principles recently set by An Bord Pleanala, The planning Authority increased DC zoning to new lands, while also recently granted planning permission ref,17525 for 2439 Sq. m for more of the same 'vacant' business enterprise. This inconsistency being of immense importance because, the RRC previously allowed misinformation to be presented to An Bord Pleanala regarding substantive vacant retail units, causing the overturning of a valid DC permission.



The anomaly now is as disturbing as it is perverse, because the oversupply/vacancy's, is, as indicated above B/E business/enterprise, not District Centre uses as previously proclaimed, indicating evidence of serious inconsistency in the process if not abuse.

It may be suggested what's the purpose of a retail strategy when planning Authority contradict their own objectives as set out above. It's too late closing the gate when the animals are gone. The new Draft Athlone JRS, if adopted without a review of the M/BLAP 2016-2022 would only infect the wounds. It would be inept in the circumstances because the blueprints set in the 2016-2022 LAP will mean the area will still be on the side of the road, not a community insink .

The consideration of the Joint retail Strategy should be postponed, subject to a review of the M/B LAP. Set out under are abstracts from the Roscommon County Development Plan and the Previous Athlone West LAP 2010-2016. If from the assessment of the core initiative, the objectives of the previous LAP, and RCCDP, (set out on the following pages Appendix 1), it is accepted.....

(1) That, the envisaged link roads and access to the N61 are vital to the future development of the Area, that future increases population or enterprise development will be hindered by the current limited access.

(2) That. the identification of District Centre zonings as indicated, imply the central areas, and that the LAP indicates consolidation of the District Centre zoning at the Old and New Tuam Roads as one centre. The linked Centres, Old and New Tuam Roads.

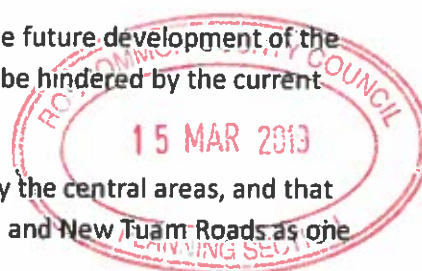
(3)That, In appreciation of the paragraph from the Roscommon County Development Plan, The sentiments "*The ongoing development of a district centre, capable of serving local retailing, recreational and social needs is viewed as being a priority for this area.*" are third-party observations rather than a factual report of the Development indicating a single District centre, in this context the RCCDP is referring to The Regional Planning Guidelines for the West Region. not the other way around.

(4)That, there is a clear statement from The Regional Planning Guidelines for the West Region, in this 2014 report, that there is a requirement for a joint retail Strategy, an indication that the formalisation of the 2016 LAP was deficient by disregarding same.

(5)That, circumstance of independent supermarket operators, sharing the same parking lot, let alone floor space is remote.

IF it cannot be denied that these aspects set out are agreeable circumstances, then it must be clear that apart from the lack retail Strategy in the M/Blap 2016-2022, that the population targets are in serious error and the LAP is totally redundant. The continuity of process has been undermined and this by means of false reports. As previously indicated , the full attributes of the 2016-2022 LAP consist of extending and condensing of Retail, while simultaneously reducing and retarding new residential construction. In consideration of consolidation it has further fragmented the area. The LAP is more a retail than a community exercise, to re-edit it or endorse the document with any form of consolatory joint venture status is testament to deficiency.

In consideration, that the Monksland/Bellanmullia LAP 2016-2022 has disregarded previous long-term strategies, this in favour of unilateral short term tactical development, with the principles of



evidence based forward planning strategy being compromised in such a Plan, the agenda of which could only have been established in the 'absence' of a joint initiative, the result being a fundamentally flawed LAP, It would be folly to invest further, or try to reconcile same.

It is respectfully stated that the concept of shuttering up a flawed plan or retrofitting its statutory validity would be a travesty in action. It can be established that there is no continuity in process when assessed against the 'set' strategies outlined below, see Appendix 1 below.

This variation 2 should not be considered.

Donal Kenny



Appendix 1:

Abstracts below from the 2010-2016, the paragraph indicates the initial long term aim of the LAP was to consolidate the area with road infrastructure, eventually allowing access to the N61

**Monksland/Bellanamullia (Athlone West) Local Area Plan 2009 – 2015**

*"2. Local Access Road Option 2 and 3: It is recommended that access options be considered which will allow access from the N61, linking into the Local Linkage Road as well as accessing the land zoned as District Centre. (IAR 2 and IAR 3) 3. Local Access Road Option 4: It is recommended that an access option be considered which will allow access from the Local Link Road north between land zoned for Business, Enterprise Park/Light Industry & Warehousing and District Centre (IAR 4) It should be noted that these road options are indicative only until such time as a full site feasibility and investigation report is produced and a preliminary preferred route option is chosen. The local access road options will be subject to separate development and consent processes depending on the planning applications received"*

**Monksland/Bellanamullia (Athlone West) Local Area Plan 2009 – 2015 Page 80**

*"Objective 27 Work with Westmeath County Council in the provision of further cross river linkages."*

*"Objective 164 Prepare a joint Local Area Plan with Westmeath County Council / Athlone Town Council for lands at Bellaugh and including lands outlined as Specific Objective 8 (SO8) (as amended)"*

**Monksland/Bellanamullia (Athlone West) Local Area Plan 2009 – 2015 Page 92**

*"Section 9.3.4 of this LAP provides a detailed discussion concerning the provision of District and Local/Neighbourhood Centres. Two District Centres are proposed within the LAP area. The preferred options for their location are listed below and the reasons outlined in Section 9.3.4;"*

Location Option 1: Bogganfin

*"Location Option 2 and 3: Lands along the New Tuam Road and at the New and Old Tuam Road Junction"*

*"The proposed new District Centre at Bogganfin (Option 1 above) and linked District Centre on the New and Old Tuam Roads (Option 2 and 3 above) would primarily serve the local needs of residents*

*in the area and would be readily accessible to the pedestrian catchment within a 500m radius of the centres and to a wider residential catchment via private car,"*

**Roscommon County Development Plan 2014-2020 Page 26**

**2.3.4 Monksland /Bellanamullia (Athlone West – Tier 2 Special Category)**

*"A feature of this area in recent years has been an accelerated growth in terms of housing and population. However, Monksland/Bealnamullia does not enjoy, as yet, the range of services of a settlement centre in their own right and in planning terms is viewed as being part of a larger linked gateway. Monksland/Bealnamullia is included within Tier 2 of the Settlement Hierarchy given its population and status in terms of employment and service provision. It is envisaged that Monksland/Bealnamullia will develop as part of a larger settlement (Athlone Town) and in recognition of this distinction from the 'Key Towns' within Tier 2, Monksland/Bealnamullia is assigned the designation of a Special Category settlement within Tier 2 of the settlement Hierarchy, due to these external influences. It is acknowledged, however, that Monksland has a vital economic role in terms of its strategic location as part of Athlone, which is part of the Midland Linked Gateway (triad of centres). Monksland is envisaged, as part of this Core Strategy, as continuing to be a prime Industrial centre with its proximity to the M6, railway link, and allocation of Industrial lands justifying this designation. The Regional Planning Guidelines for the West Region acknowledge that Athlone has a significant influence on the economic development of South Roscommon. The document supports the overall development of Monksland/Bellanamullia as an integral part of Athlone and the Athlone Gateway but recognises that the area requires phased infrastructural support, services and facilities such as schools, a recreational park and improved public transport. The ongoing development of a district centre, capable of serving local retailing, recreational and social needs is viewed as being a priority for this area. As recommended by the Retail Planning Guidelines (2012) coordination in relation to local planning issues in terms of policy and a joint Retail Strategy is required on the part of Roscommon and Westmeath County Councils. Roscommon County Council endorses this approach and has made initial approaches to its neighbouring County Council in this regard."*

END

