



**PLANNING SUBMISSION RE
LOUTH COUNTY DEVELOPMENT
PLAN 2021-2027**

In respect of

**LANDS AT KELLS ROAD,
COLLON, CO. LOUTH**

Prepared by

GENESIS PLANNING CONSULTANTS

On behalf of

ALAN GRAY

OCTOBER 2020

Document Control Sheet

Job Title: Lands at Kells Road, Collon, Co. Louth

Job Number: 2020-12


Report Ref: Planning Submission

Author: Ronan Woods

Date: October 2020

Distribution: Client

Document Status				
Rev	Purpose of Document	Authored by	Reviewed by	Review Date
1	Draft	G Mackin	R Woods	02/10/20
2	Final	R Woods	R Woods	22/10/20

Approval for Issue		
Ronan Woods		-

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1 INTRODUCTION

1.1 Purpose of Report

- 1.1.1 The Planning Authority is commencing the preparation of the County Development Plan (CDP) for the county to cover the period 2021 to 2027. The purpose of the CDP is to set out an overall strategy for the proper planning and sustainable development of the county.
- 1.1.2 Genesis Planning have been engaged by Mr Alan Gray to examine and assess the existing policy context, settlement envelope in Collon and to prepare this submission to the Planning Authority on his behalf.
- 1.1.3 In terms of background our client is in ownership of subject lands as outlined on the Kells Road. Our client is also in the process of seeking planning consent to develop the lands with a scheme broadly similar to what was previously granted permission.
- 1.1.4 In preparing this submission we have undertaken an analysis of our client's lands in the context of the National Planning Framework, the 2015-2021 CDP and the Regional Spatial Economic Strategy for the Eastern and Midland Region (RSES).
- 1.1.5 The analysis undertaken by Genesis Planning identified a number of areas of interest which demonstrate that the subject lands are appropriate for inclusion in the settlement envelope for Collon going forward. These are set out in this report.

1.2 Background to Submission

- 1.2.1 Mr Alan Gray has engaged Genesis Planning to make a submission on their behalf to the Planning Authority on the draft County Development Plan 2021 – 2027, specifically in relation to subject lands at Kells Road, Collon, Co. Louth.
- 1.2.2 In totality the subject lands occupy approximately 5.01ha at Kells Road, approximately 750m west of the Town Centre of Collon along the C297 local road corridor which runs through the centre of Collon.
- 1.2.3 This submission to the Planning Authority outlines proposals for the subject lands to be included in the settlement envelope of Collon, to be identified in the forthcoming CDP.
- 1.2.4 Specifically the purpose of this submission is to ensure that an appropriate planning policy and zoning framework is incorporated into the forthcoming CDP to ensure that much needed industrial and warehousing uses can be facilitated on the subject lands.
- 1.2.5 In particular we requests that the forthcoming CDP provides for 'Employment Uses' zoning on the subject lands objective and that any associated zoning matrix in the CDP is included to enable development of the lands for such uses.

2 SUBJECT LANDS IN CONTEXT

2.1 Overview & subject lands

- 2.1.1 The subject lands occupy approximately 5.01ha along the Kells Road (C297), and currently form part of a large agricultural field which is zoned.
- 2.1.2 The lands are adjoined by agricultural lands, with an established business park located on lands further to the south-west.
- 2.1.3 The gradient of the site slopes downwards from the road level, with the subject lands being appropriate for development purposes in terms of visual context.
- 2.1.3 In terms of existing planning context, we note as per the current Louth County Development Plan 2015-2021, Collon is designated as a Level 3 Settlement, with a population of 896 (2016, CSO data).
- 2.1.4 In terms of location the subject lands are located approximately 450m from the settlement core of Collon along the C297 local road connecting to the R168 regional transport corridor running from Collon to Drogheda approximately 12.1km to the south-east.
- 2.1.5 This local context means the subject lands are ideally positioned to facilitate a business park, given the separation distance from the residential core of the settlement.
- 2.1.6 In terms of the wider context and connections, the subject lands are well located relative to the regional and national road network, meaning it is an ideal location to facilitate a business park for local employment.

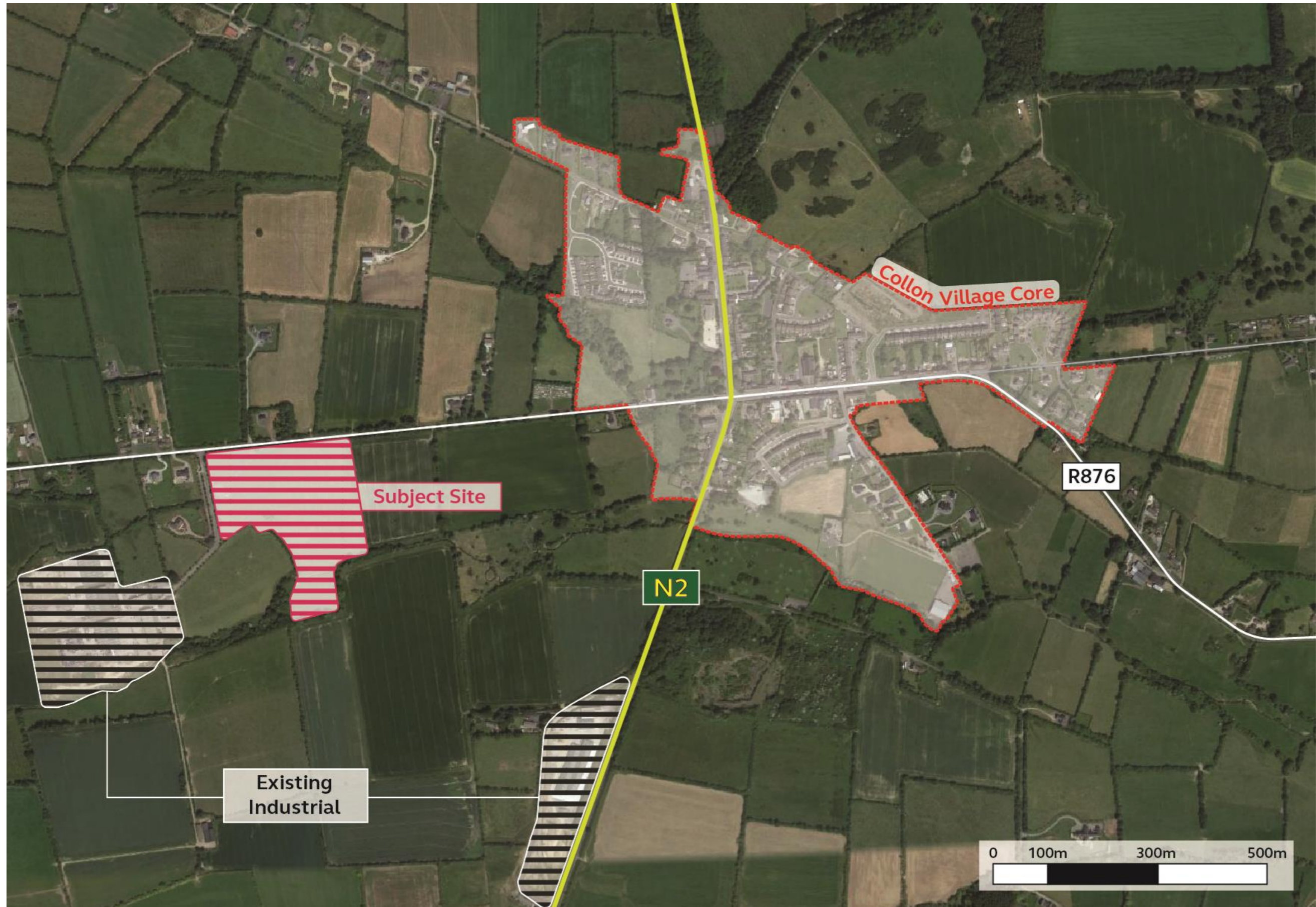


Figure 1: Aerial view of subject lands and local context

2.2 Current Planning Context

2.2.1 Under the current CDP (2015-2021) the subject lands are currently zoned for employment use as indicated in figure 2 below (lands outlined in purple), and also within the current settlement boundary of Collon.

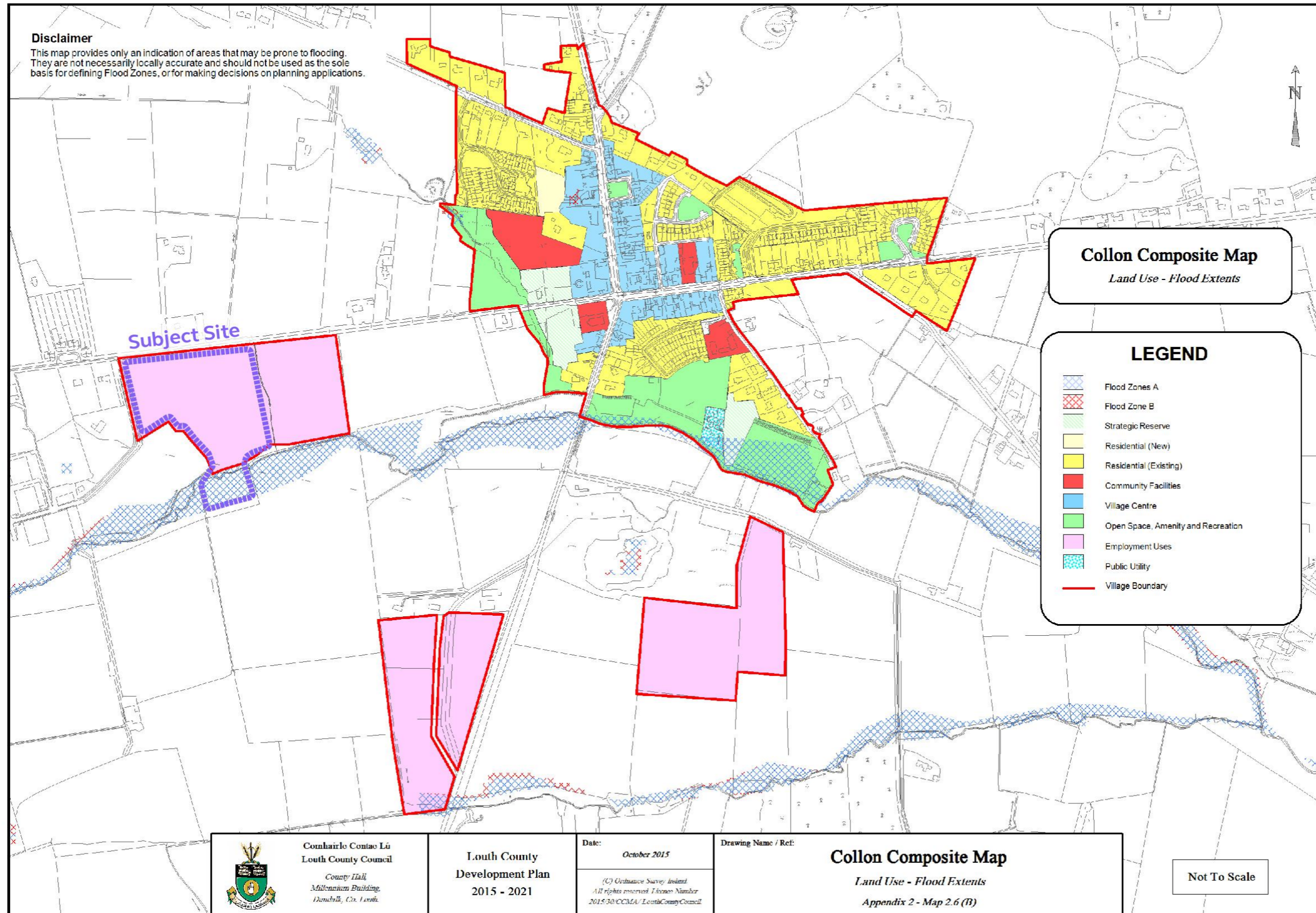


Figure 2: Collon Zoning Map with Subject Site identified (Source: Louth County Development Plan 2015-2021)

2.3 Previous Planning Context

2.3.1 A review of the planning register identified an application previously submitted in respect of the subject lands.

File Number	07452 & ABP reference 227295
Applicant Name	Mr. Alan Gray
Application Date	28/03/2007
Development Description	Business Park consisting of 10 no. separate buildings providing a total area 11,736 sqm of industrial space each with associated offices, showrooms, access roads, footways, goods yards, parking, landscaping and fencing.
Decision (Date)	Refusal by ABP (14/01/2008)

File Number	09179 & 233788 ABP reference
Applicant Name	Mr. Alan Gray
Application Date	26/03/2009
Development Description	Business Park consisting of 9 no. separate buildings providing a total area of 9437m ² of industrial space each with associated offices, showrooms, access roads, footways, goods yards, parking, landscaping and fencing.
Decision (Date)	Conditional Approval (13/05/2009)

File Number	14381
Applicant Name	Mr. Alan Gray
Application Date	15/09/2014
Development Description	Extension of Duration of Planning Permission Ref. No. 09179.
Decision (Date)	Conditional Approval (05/12/2014)

Table 1: Previous planning application for subject lands

2.4.2 In summary, the site has been subject to a number of conditionally approved schemes, the last of which was an extension of duration application approved on 5th December 2014. Details of 2009 approved site layout attached below.

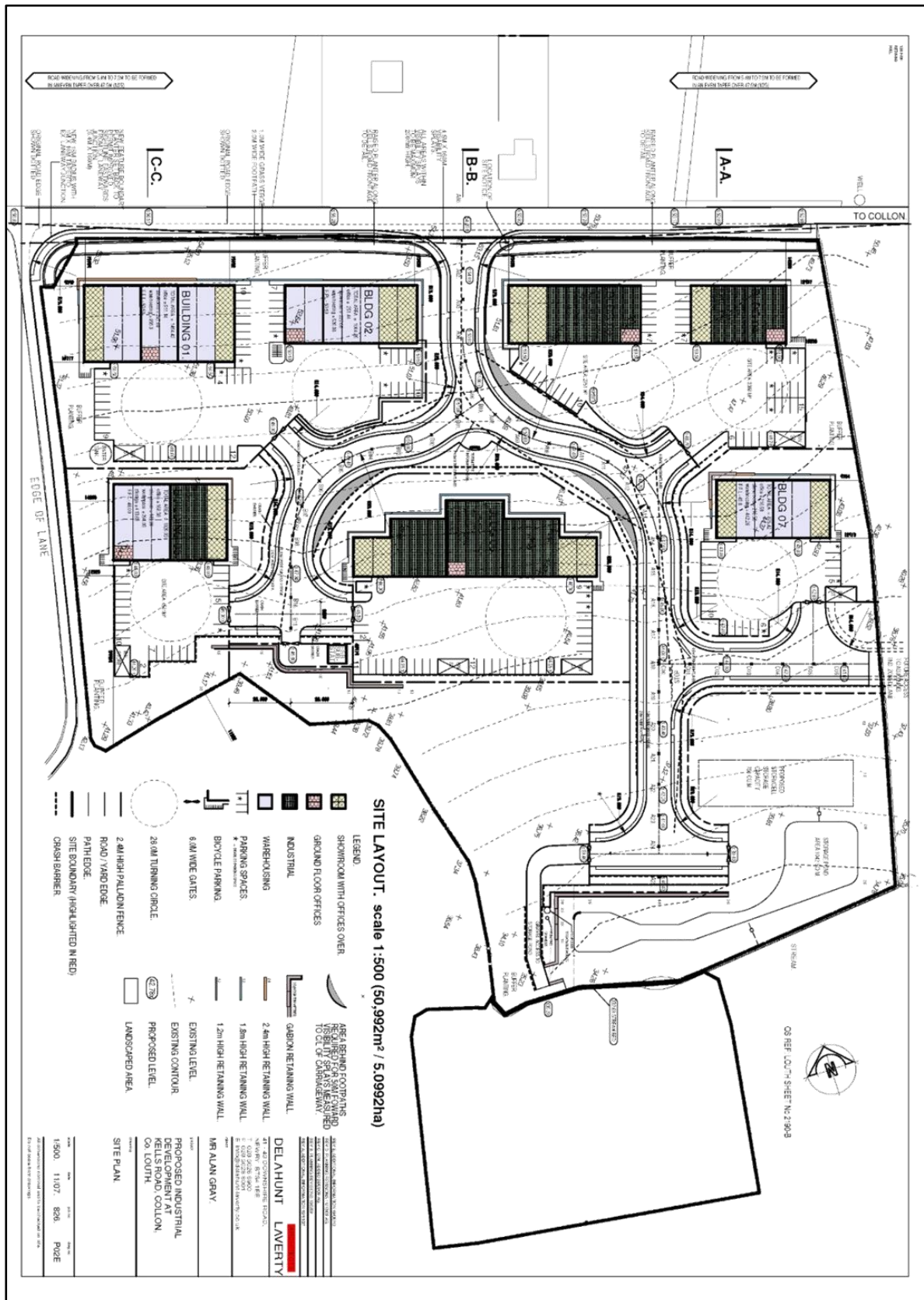


Figure 3: Site Layout of approved 2009 scheme (Ref: 09179 – 233788 ABP Reference).

3 REVIEW OF CURRENT PLANNING POLICY CONTEXT

3.1 Overview

3.1.1 As will be set out below the continued zoning of the subject lands for employment purposes is in accordance with the principles of proper planning and sustainable development. This section of the submission sets out how support for the zoning is provided by the relevant national and regional policy context.

3.2 NPF

3.2.1 The National Planning Framework sets out strategic objectives which Planning Authorities are to have regard to. Specifically we highlight:

- Objective 5 *“To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity”.*
- Objective 6 *“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.”*
- Objective 7 *“Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities”;* and

“Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth”, and

“In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth”.

- Objective 11 *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*
- Objective 15 *“Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.”*
- Objective 23: *“Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism”.*

3.2.2 In response we submit the subject lands are appropriate for zoning as envisaged by the NPF given:

- Objectives 1c, 5, 6, 7, 11 and 15 of the NPF are complied with as the subject lands being developed for employment purposes will bring clear benefit to Collon and the rural hinterland via provision of employment.
- The NPF sets out a clear 'presumption in favour' under objective 11 of the land use/zoning as proposed for employment uses in towns and villages.
- The NPF requires the support for development of rural areas under objective 15.
- The lands are serviceable, as foul connection can be made to Collon's foul network.
- The lands are in close proximity to the urban core of Collon.

3.3 Regional Spatial Economic Strategy – Eastern & Midland Region

3.3.1 The RSES for the eastern and midland region sets out the strategic plan and investment framework aimed to *‘shape future development and to better manage regional planning and economic development throughout the Region.’* In light of this, section 1.1 of the strategy outlined the vision for the region which is:

‘To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.’

3.3.2 The RSES recognises the importance of the Dublin to Belfast economic corridor and the strategic function of this eastern corridor as a driver for regional economic development. As the largest economic agglomeration on the island of Ireland, the cities and towns along the corridor are home to a population of around 2 million people:

‘Cross boundary coordination is a significant element of the Strategy and will be even more so with the onset of Brexit, playing a critical role in supporting economic growth and competitiveness.’

3.3.3 Being in close located in proximity to the Dublin-Belfast economic corridor, Collon is strategically placed to benefit from the growth strategy outlined in the RSES, in particular its proximity to the cross-border network of Drogheda, Dundalk and Newry. The imperative to counteract BREXIT with a proactive spatial economic policy adds to the international significance of this Corridor.

3.3.4 Regional Strategic Outcomes sets out how it is envisaged to achieve the goals set out in the NPF. Of the 16 RSO’s we highlight:

- **3: Rural Communities:** *Support sustainable rural development and strengthen rural networks, economies and communities. Manage urban generated growth in areas under strong urban influence and encourage sustainable growth in areas that have experienced decline or stagnation. (NSO 1, 3)*

3.3.5 Further in terms of town and villages, section 4.8 of the RSES sets out the approach required for regeneration, renewal and funding opportunities for rural towns. Objectives of note include:

- **RPO 4.79:** *Local authorities shall identify and provide policies that recognise the contribution that small towns, villages and rural areas contribute to social and economic wellbeing. As part of this policy provision that seeks to support*

and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism and forestry enterprise is supported.’

- **RPO 4.82** *‘Local authorities shall ensure that economic development that is urban in nature should be in the first instance located in urban areas.’*

3.3.6 Also, the RSES aims to promote further employment growth within the area to provide a greater jobs to residents ratio.

- **RPO4.14** *‘Promote self-sustaining economic and employment-based development opportunities to match and catch-up on rapid phases of housing delivery in recent years to provide for employment growth and reverse commuting patterns.’*

3.3.7 Further, being located approximately 12km from Drogheda, Collon is well-placed to achieve some of the economic and employment goals set out in the RSES for Drogheda and its surrounding hinterlands. In terms of the development strategy outlined in the RSES, it echoes the NPF in that it states:

- *RPO4.1 “local authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region.*
- *RPO 4.82: Local authorities shall ensure that economic development that is urban in nature should be in the first instance located in urban areas.*
- *RPO 4.83: Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.*
- *RPO 6.3: Support the effective planning and development of large centres of population and employment along the main economic corridor, in particular Drogheda and Dundalk.*
- *RPO 6.5: Local authorities shall explore projects in LECPs for the enhancement of the competitiveness of their rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services.*
- *RPO 6.9: The Regional Assembly supports the Regional Enterprise Plans to focus on; • Support(ing) a high level of economic success throughout the region by building on local strengths and regional innovation capacity.*

3.3.8 In this context as the subject lands are strategically positioned adjacent to the village core of Collon it is clear the inclusion of the lands within the settlement envelope of Collon will be consistent with the objectives set down by the RSES, facilitating economic and employment growth and providing a greater jobs-to-residents ratio within the area.

3.4 Louth Local Economic Community Plan 2016-2022

3.4.1 The Local Economic and Community Plan [LECP] for County Louth sets the objectives and actions needed to support and guide economic and community development in County Louth over the six-year period 2016-2022.

3.4.2 The LECP is a mid-level plan; it is a strategic but action focused document. It contains high level Goals for both economic and community development, supported by specific objectives under each element.

3.4.3 Of particular relevance to the proposal are goals 1, 2, 4, and 5 which state:

- **Economic Goal 1 – Foreign Direct Investment** - Promote and develop Louth as a key investment location on the Eastern Economic Corridor. Specific economic objectives relating to this goal include:
 - **Objective 002** - *‘Play active supporting and facilitator role alongside government agencies to implement the Regional Action Plan for Jobs.*
 - **Objective 003** - *‘Create a Louth Brand to attract and promote business and quality of life’.*
 - **Objective 004** *‘Work collaboratively with interregional agencies to promote cross border and transboundary business and investment initiatives.*
- **Economic Goal 2 – Sustainable Development** - Promote the growth of new and existing business and communities in Louth in accordance with the principles of sustainable development.
- **Economic Goal 4 – Future Focused Innovation** - **Ensure that Louth will be a leader in business development, creating new models of flexible value and enterprise. Specific economic objectives relating to this goal include:**
 - **Objective 015** – **‘Advance sustainable business innovation in products, services, organisational behaviour and ways of working’.**
- **Economic Goal 5 – Indigenous Industry** - Deliver viable local economies underpinned by innovation and entrepreneurship. Specific economic objectives relating to this goal include:
 - **Objective 016** – *‘Lead age-friendly business development, creating new models of flexible value and enterprise’.*
 - **Objective 017** – *‘Drive an increase in competitiveness and promote the development of indigenous industry sectors and Irish bred internationally traded services.*

3.4.4 In response we submit the objectives identified within the Louth LECP are supportive of the proposal, which represents an opportunity to realize, at least in part, some of the goals of the LECP with regards to stimulating local enterprise, employment and innovation.

3.5 Louth County Development Plan (CDP) 2015 – 2021

Overview & Context

- 3.5.1 The current Louth CDP sets out the strategic land use objectives and policies for the overall development of the county up to the year 2021, acting as a guide for those interested in pursuing development and to inform the general public as to how development proposals are likely to be assessed.
- 3.5.2 The plan also informs the decisions of the Planning Authority in deciding the suitability of different types of development in the county.
- 3.5.3 In terms of settlement hierarchy, under the current CDP Collon has been identified as a Level 3 – Small Town which have been identified as settlements which contain:

‘a satisfactory range of services such as schools, churches and shops and are serviced by public piped utilities. They are characterised by a high degree of self-sufficiency and the ability to cater for limited additional residential development subject inter alia to capacity within the foul drainage system and public water supply.’

Core Strategy

- 3.5.4 The core strategy of the CDP focuses on building strong urban centres and protecting rural hinterlands, in particular the preferred development strategy is aimed at building *‘Critical mass in the large growth towns of Dundalk & Drogheda, at the moderate sustainable growth towns of Ardee and Dunleer and at key small towns (Annagassan, Baltray, Castlebellingham/Kilsaran, Carlingford, Clogherhead, **Collon**, Dromiskin, Louth Village, Omeath, Knockbridge, Tallanstown, Termonfeckin, Tullyallen);*
- 3.5.5 Of specific relevance is policy CS2 of the core strategy the objective of which is:
‘To facilitate orderly and sustainable development in Level 3 Settlements for the duration of this plan, through the implementation of an overall phasing strategy’.
- 3.5.6 Of particular relevance objective CS6 in section 2.11 of the CDP which refers to the economic strategy for the future economic development of the County, particularly at Level 3 settlements stating:
*‘To promote and attract economic activity at the Level 3 Settlements of Annagassan, Castlebellingham/Kilsaran, Clogherhead, **Collon**, Knockbridge, Louth Village, Tallanstown, Termonfeckin and Tullyallen.’*
- 3.5.7 The CDP recognises that although the majority of economic growth for the County will take place in the two principle urban areas of Dundalk and Drogheda, there is considerable scope for economic opportunities in the smaller level 2 and level 3 settlements, encouraging land to be zoned accordingly to facilitate this. (emphasis added)

Settlement Strategy

- 3.5.8 The aim of the settlement strategy is to confirm the settlement hierarchy within the county, promote sustainable residential development within existing towns and villages and to make provision for sustainable housing in the rural areas of the county.

3.5.9 The LCDP also sets out a clearly identifiable five-level settlement hierarchy, composed of both urban and rural settlements. This settlement hierarchy is based on factors such as size of population, range of services, the extent and range of community and other facilities available.

3.5.10 As stated previously Collon is designated as a Level 3 settlement, policy objectives of reference within the settlement strategy include:

SS 9: To promote and facilitate limited development within Level 3 Settlements that is commensurate with the nature and extent of the existing settlement, to support their role as local service centres and to implement the policies and objectives relative to each settlement.

Economic Strategy

3.5.11 We also note under the current CDP the economic strategy seeks to support employment generating initiatives within the County. Of note

- **EDE1:** *To work in partnership with national and local economic development and employment promoting agencies to support employment generating initiatives within the County.*
- **EDE 2:** *To work in collaboration with other local authorities and agencies both within the border region and the adjoining regions to encourage economic investment and support employment generating initiatives.*
- **EDE8:** *To identify and zone lands, if required for employment activities in the Local Area Plans and Settlements and encourage the reuse of derelict and brownfield sites for sustainable economic purposes where appropriate.*
- **EDE10:** *To zone in accordance with the settlement hierarchy, an adequate quantum and range of sites (including brown field sites), thereby offering a choice of sizes and locations, to accommodate a wide and flexible range of economic development opportunities.*
- **EDE11:** *To promote and facilitate the provision of local sustainable employment opportunities on land zoned for employment uses.*

3.5.12 In response to the above we submit incorporating the subject lands within the settlement envelope of Collon in the 2021-2027 CDP would be consistent with all relevant policies and objectives as identified in the current CDP, facilitating economic growth and promoting small scale business and employment within Collon.

4 SEQUENTIAL DEVELOPMENT OF LAND, SERVICES & CONNECTIVITY

- 4.1 While the merits of the sequential approach are well established, in the context of the economic development and employment provision it is not appropriate to apply it as a concentric measure only, i.e. develop radially from the town centre.
- 4.2 In this regard the development of land for an out of centre business park is influenced by multiple factors such as availability of lands of adequate size, services, accessibility and existing infrastructure. For instance a site may be in relative close proximity to the town centre but due to the lack of existing infrastructure or other factors the site may not be appropriate or developable during a plan period.
- 4.3 Assessing the subject lands in this approach is an example of why the sequential test should examine each site in detail and not just look at it's location; specifically as the lands are proximate to existing services, and adjacent to existing infrastructure and industrial uses.
- 4.4 In this regard these attributes make the development of these lands far more important in the overall strategic development of Collon and therefore, sequentially their delivery should be considered suitable to be delivered in advance of other land parcels.
- 4.5 Further, as the subject lands have already been deemed appropriate for development under the previous permissions we submit this is a clear factor that determines the subject lands as appropriate for a business park.
- 4.5 We therefore submit the pragmatic approach by the Planning Authority should be to retain the current zoning designation for the subject site as land for employment uses as they comply with the proposed requirements set out in both the NPF and RSES - which set a clear direction for such development to be facilitated.
- 4.6 Specifically in response we highlight:
- The lands are positioned at an ideal location to ensure a high quality business park is provided; ie site is appropriately detached from the village core meaning there will be limited/no impact on local residential amenity.
 - The lands are contiguous to the existing business park located adjacent and south-west.
 - The lands are currently within the settlement envelope for Collon;
 - The lands are directly accessible from the existing road infrastructure.
 - The lands are serviceable.
- 4.7 We submit these attributes make these lands strategically important in the overall development of Collon and the development of lands for employment provision.

- 4.8 Also, we highlight for the Planning Authority it is our client's clear intention to develop the subject lands for employment purposes, given the proposals seeking to develop the lands at present.
- 4.9 Further, we refer the Planning Authority to the section 28 guidelines 'Development Plans, Guidelines for Planning Authorities' which set out the approach required by Planning Authorities in the development plan process. Of particular relevance we highlight:
- **Development plans should be strategic:** The development plan must recognise the wider policy context and set out a strategic spatial framework – a clear view ahead in development terms – for the area the development plan covers. This spatial framework, while acknowledging wider social, economic and environmental trends, needs to focus on the “big picture” planning issues, possibilities and considerations that will underpin how the development process in that area is to be structured in order to achieve the plan's objectives for the wider community.
 - **Development plans should be a catalyst for positive change and progress:** Substantial retail development and development of educational, health and leisure facilities and other services, offices, enterprise and commercial development will also be needed to cater for the scale of projected growth
 - **Development plans should anticipate future needs on an objective basis:** Development plans, based on an objective, needs driven assessment of future development requirements including the amount of land that needs to be zoned for particular purposes, will help to build public confidence in the preparation of those plans and their implementation. Zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.
 - **Socio-Economic Development:** The development plan is primarily focused on physical planning issues such as the location of development and the appropriate uses of land. However, this is situated within a context of economic, social and cultural objectives of the wider community. If the development plan process is to be effective and responsive to the wider objectives of society, account needs to be taken of the key drivers of change and of indicators of the need for change.
 - **Section 3.17** The development plan should be responsive to key business opportunities and trends in areas.

5 RECOMMENDED LAND USE ZONING IN THE 2021-2027 COUNTY DEVELOPMENT PLAN

5.1 Recommended Objectives & Zoning

5.1.1 Objective 1: To retain the subject lands within the settlement envelope of Collon Town in the 2021-2027 CDP, and maintain the designation as lands suitable for employment development.

Reason: To accommodate future economic growth of Collon and ensure there is sufficient and suitable lands reserved that could facilitate the orderly and sustainable development of the settlement.

5.2 Recommended Objectives/Policy

5.2.1 The locational policies under the draft CDP should incorporate a provision for such employment facilities to be accommodated in out-of-centre locations.

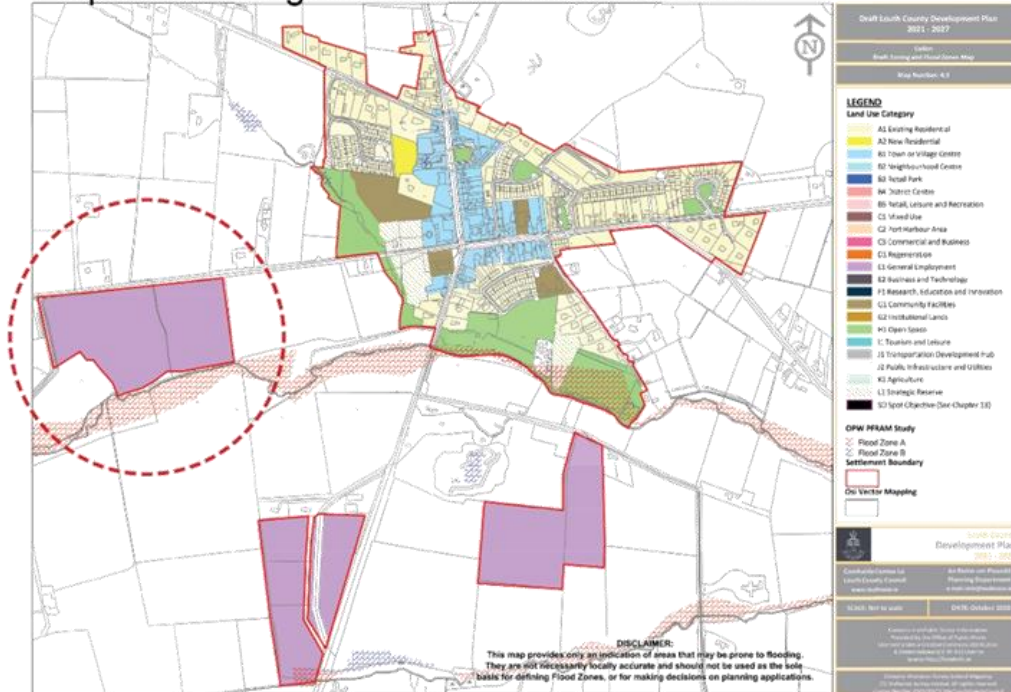
Reasons:

- (i) To achieve consistency with the objectives of the NPF; specifically objectives 1c, 5, 6, 7, 11 and 15.
- (ii) To achieve consistency with the objectives of the RSES; specifically objectives 4.1, 4.14, 4.18, 4.82, 4.83, 6.3, 6.5 and 6.9.

5.2.2 We submit the above revisions will ensure consistency with the NPF and RSES and also be consistent with the development plan guidelines which set out a need for development plans to incorporate for:

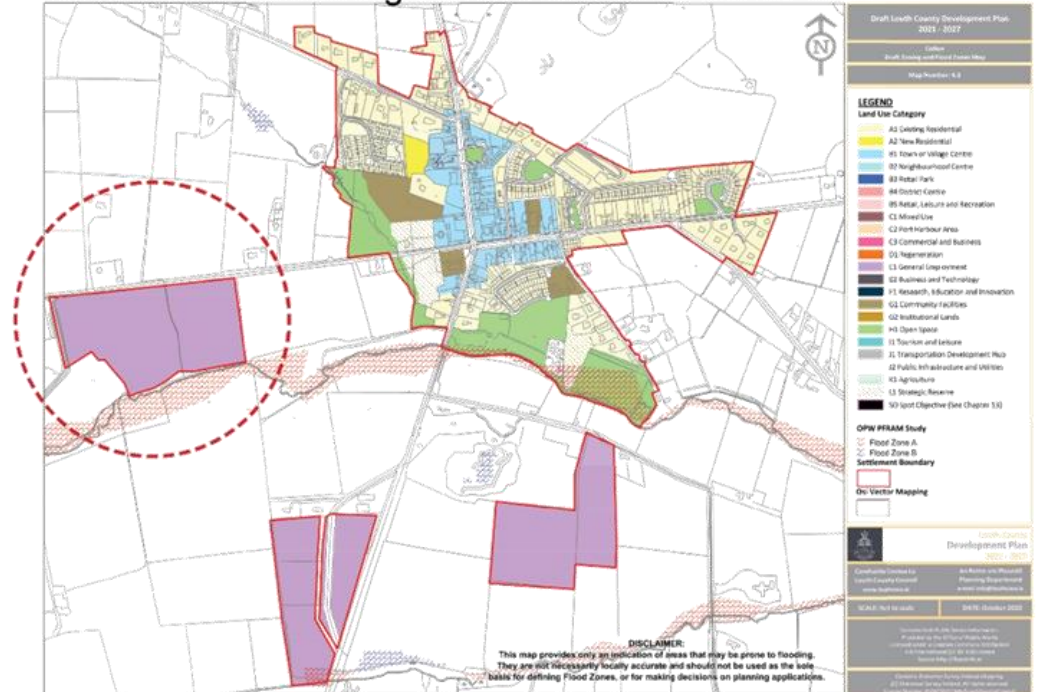
- Strategic change
- Being a catalyst for positive change and progress
- Anticipating future needs on an objective basis
- Facilitating balanced socio-economic development
- Reversing unsustainable commuter patterns and encouraging local employment and enterprise

Proposed Zoning - Draft 2021-2027 Louth CDP



5.2.3 The image above identifies the subject site (circled in red) within the settlement boundary of Collon, and zoned for employment uses, listed in the CDP 2021-2027.

Recommended Zoning - Draft 2021-2027 Louth CDP



5.2.4 Going forward we request the Planning Authority to maintain the current and proposed zoning status for the subject lands within the settlement boundary of Collon in the 2021-2027 CDP.

5.2.5 This is to accommodate projected employment growth of Collon and surrounding areas, and to ensure there is sufficient and suitable land reserved to develop necessary employment opportunities within and in the surrounding area

6 SUMMARY AND CONCLUSION

6.1 This submission relates to the parcel of lands as identified at Kells Road, Collon, Co. Louth. In summary, this submission requests the following:

- **That the Planning Authority include the subject lands as outlined for inclusion in the settlement envelope for Collon for employment uses.**
- **The locational policies under the draft CDP 2021-2027 should incorporate a provision for such employment facilities to be accommodated in out-of-centre locations.**

6.2 This is on the basis that the entirety of the subject lands are appropriate for development purposes and appropriately removed from the residential core of the village.

6.3 The subject lands are appropriate for zoning as envisaged by the NPF given strategic objectives which provide clear policy support for strengthening of towns such as Collon. We again highlight:

- Objective 5 *“To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity”.*
- Objective 6 *“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.”*
- Objective 7 *“Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities”;* and

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- Objective 15 *“Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.”*

6.4 Of note to our submission is section 4.5 of the NPF which states:

'The NPF targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village.'

6.5 At a regional level, the RSES also sets out objectives for small towns such as Collon to be developed for employment purposes. In terms of town and villages, section 4.8 of the RSES sets out the approach required for regeneration, renewal and funding opportunities for rural towns. Objectives of note include:

- **RPO 4.79:** *Local authorities shall identify and provide policies that recognise the contribution that small towns, villages and rural areas contribute to social and economic wellbeing. As part of this policy provision that seeks to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism and forestry enterprise is supported.'*
- **RPO 4.82** *'Local authorities shall ensure that economic development that is urban in nature should be in the first instance located in urban areas.'*
- **RPO 4.14** *'Promote self-sustaining economic and employment-based development opportunities to match and catch-up on rapid phases of housing delivery in recent years to provide for employment growth and reverse commuting patterns.'*
- **RPO 4.82:** *Local authorities shall ensure that economic development that is urban in nature should be in the first instance located in urban areas.*
- **RPO 4.83:** *Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.*
- **RPO 6.3:** *Support the effective planning and development of large centres of population and employment along the main economic corridor, in particular Drogheda and Dundalk.*
- **RPO 6.5:** *Local authorities shall explore projects in LECPs for the enhancement of the competitiveness of their rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services.*
- **RPO 6.9:** *The Regional Assembly supports the Regional Enterprise Plans to focus on;*
 - *Support(ing) a high level of economic success throughout the region by building on local strengths and regional innovation capacity.*

6.6 As previously determined by both the Planning Authority and An Bord Pleanala the subject lands have the capacity to facilitate a development of this nature and scale.

The site is well integrated and strategically located close to existing services, facilities and infrastructure and there is an established business park in close proximity. It is submitted the development of the site would represent a sustainable extension to the built-up envelope of Collon without any adverse impacts.

- 6.7 The subject site offers the opportunity to deliver a purpose designed business park for Collon with an ideal location close to services.
- 6.8 The subject lands are serviceable; connection can be made directly to the foul sewer line which already serves the Collon Business Park adjacent.
- 6.9 In this context our client requests that the forthcoming CDP provides for a employment use zoning on the subject lands.
- 6.10 Our client has several active expressions of interest to develop the lands; these inward investments should be supported by the Planning Authority to create local employment and reverse the trend of unsustainable commuter patterns with Collon employees having to commute considerable distances for employment.
- 6.11 Therefore it is clear there is demand for a purpose built business park in Collon and this demand is also supported by policy objectives at both the national and regional level.
- 6.12 In this context we trust the Planning Authority will have regard to the contents of this submission in it's preparation of the Louth County Development Plan 2021-2027.
- 6.13 Finally, we highlight for the Planning Authority our client's current application under reference 20791 which seeks planning consent for the business park. In this context we request the Planning Authority to support this proposed development of the subject lands via the development plan and zoning being supportive and a catalyst for change and employment generation locally.
- 6.14 Going forward we welcome the opportunity to participate in all stages of the plan making process and we request that this submission be given full consideration by the executive and elected members in preparation of the forthcoming CDP in accordance with Part II Section 11 of the Planning and Development Acts.



Ronan Woods
Director