

## **1.0 INTRODUCTION**

This is a submission on behalf of Doherty Developments Ltd. the owner of the lands edged with a solid red line below and forming part of proposed Material Alteration DLK21 of the Draft Louth County Development Plan 2021 – 2027. The material alteration proposes a change to the order of priority zoning from A2 – New Residential Phase 1 to A3 New Residential – Phase 2. **The submission seeks the reinstatement of the order of priority zoning A2 – Phase 1 to these lands.**

Doherty Developments Limited is an experienced housebuilder and is in a position to submit a planning application for residential development on the lands. A Residential A2 – Phase 1 Order of priority zoning would accelerate the lodgement of the planning application resulting in the construction of much needed housing in the area.

It is noted that the change will not add more residentially zoned land to the overall amount of residentially zoned land and as such the proposal sought in this submission is in keeping with Section 12(10(c)) of the Planning and Development Act 2000 as amended as given the modification proposes a change to the order of priority of a residential zoning the change sought in this submission would be minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site or result in an increase in the area of land zoned for any purpose. The principle of the zoning of these lands having already been subject to environmental assessment.

The lands extend to 2.1ha (5.2 acres) and are identified edged with a solid red line below. The submission site is relatively small and is an infill and self-contained site. The site has very well defined physical boundaries on all sides with the rear of properties fronting the Old Newry Road to the east, and housing and the Dowdallshill GAA pitch to the south. There is a mature hedgerow to the west and this ensures that any development on the lands has a very well defined western boundary meaning such development would be on a well-defined site with strong physical boundaries on all sides thus ensuring it represents a limited, small-scale and self-contained rounding off of the existing settlement boundary in this part of Dundalk.



I am also informed that the site has drainage and other infrastructure available and it has frontage to the Old Newry Road. Given the pattern of surrounding development it would best suit lower density housing and would accommodate only a limited number of houses. In 2008 under PA Ref 07/50 planning permission was granted for 73 residential dwellings on the lands. Unfortunately due to the financial crisis at that time that permission was not implemented.



The lands were zoned Residential A2 – Phase 1 in the Dundalk Zoning Map as contained in the draft County Development Plan 2021 - 2027.

The development of the site for housing, being a small self-contained infill site would not impact in any material way on the amount of residentially zoned land in Dundalk or the number of residential dwellings to be provided over the Plan period. It would however add choice to the housing market in the area.

### **3.0 HOUSING LAND SUPPLY IN DUNDALK AND ENVIRONS**

**Zoned Land and Availability of Housing Sites** - It is apparent that the proposal in this material alteration as with many of the other proposed material alterations that affect the order of priority for residentially zoned lands in the Dundalk and Environs area, that the conclusion has been reached by the Planning Authority following on from submissions from the Office of the Planning Regulator that there is too much land zoned for residential development in the Dundalk and Environs area and that the solution is to either ‘dezone’ lands or change the order of priority.

It is strongly contended that the above approach fails to consider the supply side of the housing land supply availability equation and in particular the market element of the supply of land for residential development. On the face of it may be that it appears there is substantial amounts of land zoned for residential development in the Dundalk area, but that does not mean that zoned land is ready and available for development. It may be the case that following from the IALUE for a site that it is considered ‘available’ from the point of view of services, but that still leaves two important elements missing from the assessment and those are whether the landowner is willing and able to bring the land forward for development and, is there demand if houses are built on the site and what is the likely annual sales. Without these assessments it is distinctly possible there is a very significant under-assessment of the actual availability of land for residential development in the Dundalk and Environs area.

With regard to the question of demand it is noteworthy that the majority of the lands north of the Castletown River in Dundalk zoned A2 Phase 1 in the original draft plan have now been altered to A3 Phase2. In the event these material alterations are accepted there no zoned land available for development north of the Castletown River, cutting off a supply source for new housing in this part of Dundalk, and further isolating it from a balanced expansion of the settlement. This approach, if adopted would further accentuate the skewed southerly growth of Dundalk.

There is a well-recognised shortfall in housing in the Dundalk area to provide housing for existing and new employees in the area. This matter is regularly raised by existing employers and by potential new employers and is having a negative impact on the ability of employers, existing and new, to recruit new employees. This situation will be accentuated with WuXi coming on stream and with new firms locating to the area as a result of Brexit and yet these proposed material amendments propose to remove land from the Phase 1 Order of priority including the submission lands, only serving to further constrict housing supply. Such an approach severely undermines the ability of Dundalk to growth to a population of at least 50,000 as per the Regional Spatial and Economic Strategy (RSES).

There is a very clear disconnect between what is perceived to be an over-supply of zoned housing land and the actual supply of new houses. It is submitted a key reason for this disconnect is that the IALUEs do not consider the supply side of the housing supply equation in terms of the actual availability of residentially zoned land and the market demand for annual sales in the event such land does come forward.

It is submitted that in the absence of national guidance on preparing development plans and on the preparation of housing strategies and Housing Needs Demand Assessments that a very high degree of flexibility needs to be contained in terms of housing provision in the Development Plan especially for a Regional Growth Centre such as Dundalk.

**Contribution from Infill Sites and Lands West of Mount Avenue** - The draft Plan relies heavily on a major contribution to housing supply from ‘brownfield sites’ and from a large Phase 1 zoning on the west side of Mount Avenue. There is no strong evidence base to support either the assumptions regarding the contribution from infill sites or the yield from these sites or for that matter any housing market factors. Similarly, we believe the lands west of Mount Avenue require extensive up-front infrastructure and there is not a strong housing demand in this area of Dundalk.

It is submitted the residential land zoning requirements needs to be reassessed following the publication of detailed national Guidance notes and at least until those are available, the order of priority strategy as contained in the material amendments whereby the subject lands are moved down the order of priority from A2 New Residential – Phase 1 to A3 New Residential Phase 2 should not be adopted. Existing residential zonings and the A2 – Phase 1 order of priority as proposed in the draft Plan should be retained and a “plan – monitor – manage” system for residential development should instead be adopted. This level of flexibility is required at least until national policy becomes available. The rate of growth can then be controlled through review of actual housing starts and population growth rather than by a rudimentary ‘dumbing – down’ of the order of priority for residentially zoned lands.

**IALUE and the Housing Market** - Of particular concern is there appears to be no assessment under the IALUE assessments with regard to the actual availability of sites that are assessed and/or the demand for housing on these sites in the event houses are built on them. Furthermore, there is no assessment as to likely annual sales rates. It is not clear if land agents or landowners were contacted and the degree of interaction that ensued. Such engagement is a fundamental input into a robust residential land allocation system. There is little point in allocating land for residential development if that land is unlikely to come forward for development and to simply assume the land will be brought forward for development because it is zoned is an incorrect assumption to make. In the absence of such knowledge and information a far higher level of flexibility is required and particularly that existing A2 – Phase 1 zonings as contained in the draft Plan are not moved down the order of priority to A3 - Phase 2.

**4.0 CONCLUSION**

Doherty Developments Limited requests that the proposed material alteration to change the order of priority to 'Residential A3 – Phase 2' is not adopted and the 'Residential A2 – Phase 1' zoning order of priority as per the original draft Plan is adopted. Doherty Developments Limited is an experienced housebuilder and is in a position to lodge a planning application to allow the construction of much needed housing in this area. The submission lands are relatively small in area and have very well defined physical boundaries such that development for residential purposes would represent a limited, small-scale and self-contained rounding off of the existing settlement boundary in this part of Dundalk.