

Forward Planning Unit.
Development Plan Review.
Louth County Council,
Town Hall,
Crowe Street,
Dundalk A91W20C
Co. Louth.

3rd December 2020

Dear Sir/Madam,

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

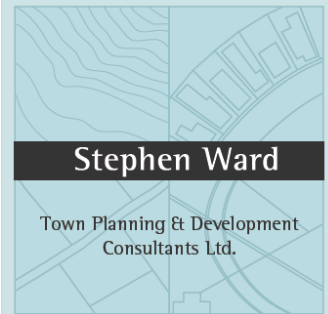
**RE: SUBMISSION TO DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021 – 2027 ON
BEHALF OF RAINBERRY LIMITED, LANDS AT TALLANSTOWN, CO. LOUTH.**

Rainberry Ltd of _____ has retained
Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House,
Jocelyn Street, Dundalk, County Louth to make this submission relating to its lands at
the above location. Please address all correspondence to Stephen Ward Town Planning
and Development Consultants Limited.

Please address all correspondence to Stephen Ward Town Planning and Development
Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth.

To assist Louth County Council in complying with the provisions of the Data Protection
Act full details of our submission on behalf of Rainberry Limited are attached.

Yours Faithfully



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1.0 INTRODUCTION

1.1 The submission lands extend to 5.6ha and are located within the defined settlement boundary of Tallanstown. The lands have been the subject of extensive engineering and building works for a residential development that has been abandoned leaving the site as a brownfield site at the heart of the village that distracts from the visual appearance of the settlement.

1.2 The site is bounded by the R171 Dundalk to Ardee Road to the south-east, by an existing residential development known as Glydeview to the north-east and by the River Glyde to the north-west and south-west.

The area of the submission land adjacent to the River Glyde extending to (c1.6ha) are zoned H1 open space and the applicant seeks to extend the H1 zoning by a further c0.65ha to allow the provision of an amenity walkway and village playground outside the flood risk area but within the submission lands. The submission then seeks the remainder of the lands zoned L1 – Strategic Reserve in the Draft Village Plan extending to 2.9ha to be changed to A2 – New Residential in the Plan. No change is sought to the A2 zoned lands at the southern area of the site (c0.45ha).

1.3 The riverside amenity area, riverside walk and the playground are all mentioned in the Draft Village Plan as desirable facilities for the village.



Figure 1 - Zoning Proposals

2.0 BACKGROUND AND PLANNING HISTORY

2.1. There is a history of planning applications for residential development on these lands. The planning history primarily dates from the mid-2000s. Under PA Ref 99/220 planning permission was granted for 28 residential sites in 1999. Under PA Ref 04/432 permission was granted for 12 dwellings on the site and under PA Ref 05/933 for 50 dwellings on the site.

2.2 There is no doubt given the planning history and indeed the commencement of construction on the submission lands that the lands are brownfield lands well within the village development envelope and located at the centre of the village.

2.3 The Report of the Planning Officer on 05/933 noted that the site was within the 50kph speed limit zone and that a development of c50 dwellings was acceptable on the site as extensive amenity spaces were proposed as part of the proposed development. The technical reports of the Council also found in favour of the proposed development including roads and infrastructure. The development was granted permission in October 2005 subject to 21 conditions.

2.4 The owners of the submission lands would intend for substantial amenity space to be provided for the benefit of the village in addition to the normal open space requirement to serve a residential development on the lands. As noted this submission seeks an extension to the existing H1 zoning on the site to allow the construction of an amenity walkway and village playground outside the flood zone area.



Figure 2 - Site Location Map

2.5 It is submitted that the Brownfield nature of the site should be recognised and this is a significant factor in favour of allocating the site for residential development in this Plan period. Given the Brownfield nature of the site it is submitted that the zoning and development of the site for residential purposes complies with National policy as outlined in the report ‘*Resolving Irelands Unfinished Housing Developments*’ (2011). It remains a National Policy Objective to “*complete the process of resolving the legacy of unfinished housing estates*” (Rebuilding Ireland – Action Plan for Housing and Homelessness, p.104). We also note the approach to unfinished estates in this National document is a “*focus on early resolution strategies rather than retaining them for asset appreciate purpose*”.

3.0 AVAILABILITY OF INFRASTRUCTURE AT THE VILLAGE

3.1 Table 13.1 of the Draft Village Plan notes the following with respect to Water Services Infrastructure / Capacity – “*Tallanstown is located within the Cavan Hill and North Louth Water Resource Zone which has capacity available at the time of writing. There was available capacity in the Tallanstown Waste Water Treatment Plant at the time of writing*”.

4.0 AVAILABILITY OF COMMUNITY INFRASTRUCTURE AND FACILITIES AT THE VILLAGE

4.1 Table 13.1 of the Draft Village Plan notes there is a national school at the village along with a shop, sub-post office, recycling facilities, crèche, church, credit union and a GAA pitch. These community facilities demonstrate there is no short-fall of such facilities in the area.

4.2 The Plan notes as an opportunity “*The provision of a walkway/cycleway along the River Glyde*”. In addition the Plan notes – “*The village would benefit from the provision of a playground*”. It is a Policy Objective of the Village Plan –

“TAL 10 – To support existing public, community and sporting facilities and the provision of any additional facilities including a playground”.

“TAL14 – To investigate the development of walkways and cycleways at appropriate locations throughout Tallanstown including adjacent to the River Glyde”.

TAL19 – To promote the preservation of individual trees or groups of trees including those identified on the Composite Map and to manage these trees in line with Arboricultural best practice”.

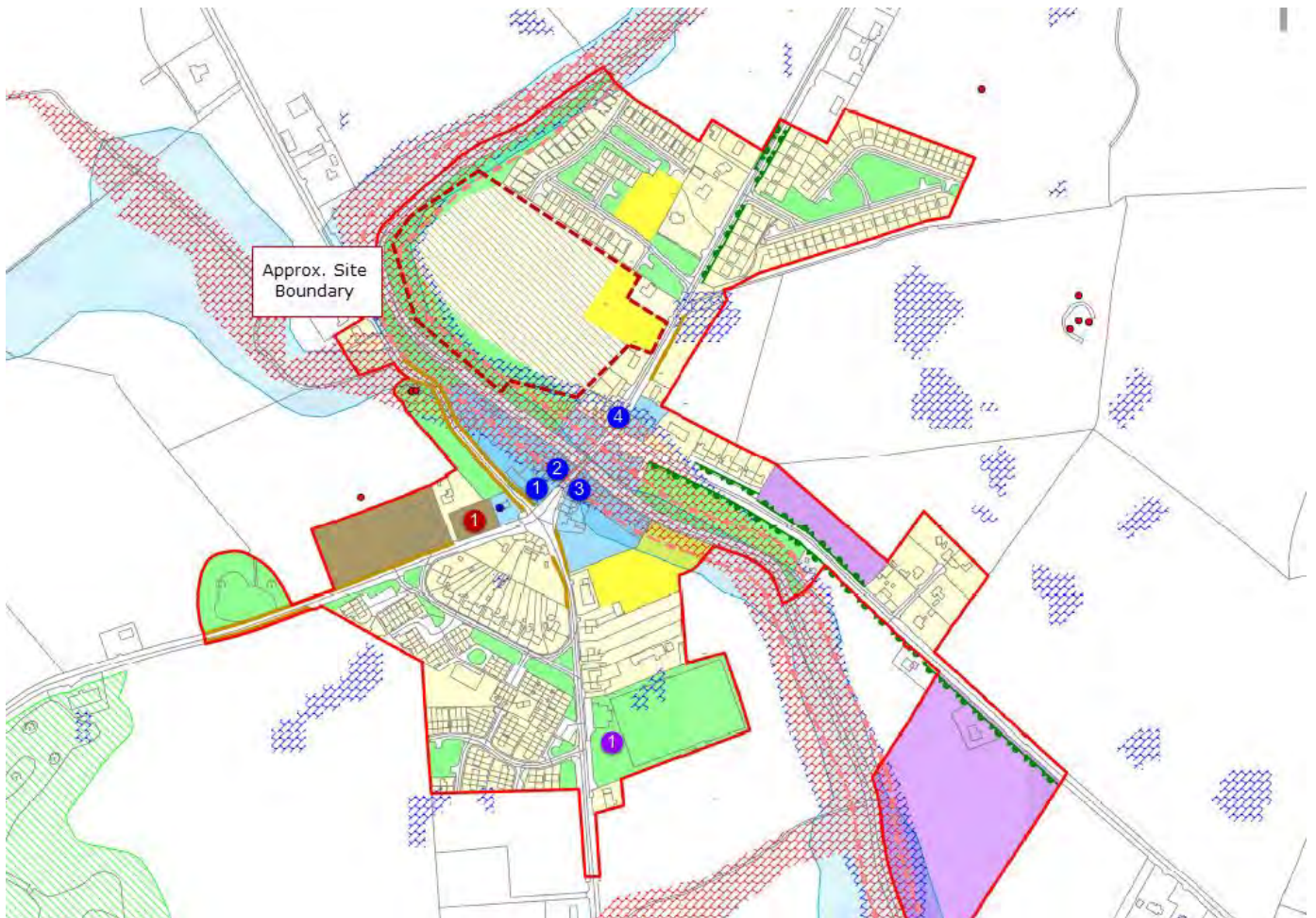


Figure 3 - Community Audit Map

Sports / Recreation	
1	GAA Club

Retail	
1	Shop
2	Public House
3	Takeaway
4	Bar / Lounge

Community Services	
1	Church

5.0 THE CORE STRATEGY AND HOUSING LAND ALLOCATION AT TALLANSTOWN

5.1 Table 2.4 within Chapter 2 of the Development Plan places Tallanstown at Level 4 – Small Towns and Villages in the County Settlement hierarchy. It is noted that the population of the village was static over the period 2011 to 2016. This does not augur well for sustaining village services and educational facilities into the future.

5.2 The Tiered Assessment Analysis at Appendix 2 to the Development Plan deals with Tallanstown at Pages 64 to 66. The submission lands received a very good score in terms of their suitability for development. The Tiered Assessment Analysis for Tallanstown is reproduced below. The submission lands are Site 4. It is perhaps not surprising that the lands received such a good score in the assessment given the brownfield nature of the site and its location at the centre of the village. We submit the score of 3 for “Infill / Backland” is too high and that the site deserves a better (lower) score.

Settlement - Tallanstown						
Tiered Assessment Analysis						
Land Use	RES	RES	RES	SR	EMP	EMP
Infrastructure Type	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Roads	●	●	●	●	●	●
Footpath	●	●	●	●	●	●
Public Lighting	●	●	●	●	●	●
Water	●	●	●	●	●	●
Wastewater	●	●	●	●	●	●
Tier 1 or Tier 2	●	●	●	●	●	●
Land Use Evaluation						
Proximity to Town Centre	1	1	1	1	1	2
Contribute to Consolidated/compact growth	1	1	1	2	3	5
Proximity to shops and services	1	2	2	2	2	4
Proximity to schools	1	2	2	2	N/A	N/A
Infill/Backland	1	1	1	3	5	5
Availability to public transport	1	1	2	2	2	3
Flooding	4	1	1	1	1	4
Total	8	7	7	10	14	23

5.3 Role of Infill / Brownfield Sites – The Draft Plan espouses developing brownfield / infill sites over greenfield lands. The submission lands are clearly brownfield having previously been the subject of building, construction and engineering works. We believe the lands should be designated for residential development in the manner proposed in this submission as the Development Plan strongly supports development on infill and brownfield lands. Within the draft Plan, commentary and policy objectives regarding development on brownfield lands include the following –

“CS14 – To ensure localised sustainable growth within small towns and villages identified in the settlement strategy is proportionate to the size of the settlement, prioritising infill/brownfield sites and that economic related development is supported”.

5.4 Section 2.17 of the Draft Plan states with regard to small towns and villages – *“Any new residential development shall be proportionate to the size of the settlement in which it is located with priority given to infill and brownfield development”.*

5.5 The Draft Village Plan for Tallanstown contains the following Policy Objective that directly and explicitly promotes development on brownfield lands within the village –

“TAL3 – To support and encourage residential development on under-utilised and/or vacant lands including ‘infill’ and ‘brownfield’ sites, subject to a high standard of design and layout being achieved”.

5.6 It is noted that TAL2 aims to ensure that the *“housing allocation for Tallanstown is not exceeded”*. However, the Draft Plan groups all the Level 4 settlements together and does not provide individual housing allocations for these settlements.

5.7 It is strongly contended that residential development on infill and brownfield sites should be considered “windfall” sites and development on these sites should not be counted towards meeting housing requirements. Development on such sites only produces positive outcomes in terms of urban development and as such should be encouraged at all times regardless of how many dwellings are provided from this source. Over the intercensal period 2011 to 2016 the population of the village was stagnant and we contend the village needs to grow and the submission lands, being brownfield lands at the centre of the village, represent an ideal location for additional housing to allow the village to grow in a sustainable manner.

5.8 Strategic Objective SO14 of the County Plan states – *“Reverse rural decline in small towns and villages through sustainable, targeted measures addressing vacancy and delivering sustainable reuse and regeneration outcomes”.*

6.0 THE ROLE AND PURPOSE OF POPULATION TARGETS

6.1 The importance of understanding the purpose of population projections cannot be over-estimated. It is succinctly put by the Director of the Eastern and Midland Regional Assembly in his response to submissions on the Draft RSES where he states at Page 36 of his Report –

In relation to the population projection for Drogheda being too low, it is considered that the population target of 50,000 would enable a city scale population to be achieved in Drogheda and this is considered an appropriate target to aim for. It is important to note that this should not be viewed as a constraint on the growth of the town, rather that it is expected to reach this target and if it is exceeded by 2031, that it will be considered successful. Having regard to the calls for city status to be assigned to Drogheda, it is considered that the designation of city status to a settlement is not a function within the remit of the RSES, it is acknowledged that a population of at least 50,000 is considered to be a city scale and that is the target set in the RSES. However the RSES focuses on growth in the right locations and establishing the drivers for the settlement to sustainably grow as a strong Regional Growth Centre that is a priority focus for the region.

6.2 It is submitted that in the absence of national guidance on preparing development plans and on the preparation of housing strategies that a very high degree of flexibility needs to be contained in terms of housing provision for towns and villages. It is neither advisable nor appropriate for population or housing provision over the Plan period to be set out as caps or thresholds not to be exceeded, which is the approach adopted in the Draft Louth County Plan.

6.3 As per the Director's Report from the Regional Spatial Strategy population growth rates should be seen as targets which the Council should aim to achieve as minimums and should embrace and celebrate when targets are met and exceeded. Otherwise County Louth runs the risk of underperforming in terms of achieving its population and housing targets.

7.0 POPULATION PROJECTIONS NEED TO BE TREATED WITH CAUTION

7.1 The most recent ESRI Report on regional demographics December 2020 and entitled "Regional Demographics and Structural Housing Demand at County Level" (ESRI Dec 2020) suggests that the previous projections for annual housing requirements are at least 8,000 below or over 30 per cent below what is now expected. The obvious outturn from these most recent projections is a lot more land needs to be zoned for residential development than was previously anticipated. Furthermore, ESRI advise that an obsolescence rate also needs to be factored and this has not been done in the Draft Louth Housing Strategy.

7.2 The amount of land zoned A2 in the village is far too restrictive and the submission lands, being brownfield and within the settlement envelope need to be added to the A2 zoned lands to ensure sufficient flexibility for new housing development and by implication a reasonable level of population increase and to allow some choice and variety in the housing market at the village.

7.3 In addition to the above further lands need to be zoned for residential development at the villages given the increasingly robust policy provision with respect to planning applications for single houses in the countryside. For example policies CS15 and CS16 of the Draft Plan state –

"CS15 – To strengthen and rejuvenate the fabric of rural villages and create sustainable rural communities to meet rural generated housing needs and alleviate the need for one off rural housing in the open countryside".

“CS16 – To direct rural generated housing demand to rural villages in the first instance and ensure that one-off housing in the open countryside is only permitted where there is demonstrable compliance with the criteria for rural housing as provided in this Development Plan”.

8.0 CONCLUSIONS

8.1 The Draft Plan notes that the population of the village of Tallanstown was static over the period 2011 to 2016. Unless the population of a village grows over time it will inevitably result in the loss of existing education, community and other local village services. The draft Plan strongly encourages development on brownfield lands and particularly Policy Objective TAL3 that states – *“To support and encourage residential development on under-utilised and/or vacant lands including ‘infill’ and ‘brownfield’ sites, subject to a high standard of design and layout being achieved”.* Given this policy objective it is submitted that the lands which are brownfield lands at the centre of the village are ideally suited for development within the period of this Development Plan. It is submitted that to zone the lands L1 – Strategic Reserve in the Village Plan is a contradictory policy provision with the Plan calling for development on brownfield lands and yet this brownfield site that is at the centre of the village is not zoned for development.

8.2 The submission lands present an opportunity to allow a sustainable level of population growth over the period of the new Development Plan. Population growth is essential as education and other community services are to survive in the medium to long term. The zoning of the submission lands would also facilitate the achievement of other policy objectives for the Village Plan in that they would allow the development of a riverside walk (Policy Objective TAL14) and also a village playground (Policy Objective TAL10) as well as ensuring the protection of trees (Policy Objective TAL19).