



15th December 2020

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

Louth County Council
18 DEC 2020
Customer Services
Dundalk

Dear Sir or Madam

COUNTY DEVELOPMENT PLAN REVIEW.

EHP Services has been appointed by Mr Patrick and Mrs Sonia Griffin to make the following submission in respect of the extent of lands zoned within the village of Collon for general employment as provided for in Map 4.3 of the draft County Development Plan 2021-2027.

Please find enclosed a separate sheet of contact information in compliance with data protection legislation.

The Submitters live along the Kells Road where there is one of three large blocks of lands zoned in the current and draft County Plans as Employment Uses and E1 General Employment respectively (see Map 1 overleaf). This is addition to the existing Collon Business Park located further along the Kells Road. We estimate the total area of lands zoned for employment generating uses as follows:

Area	Hectares
A - Kells Road (N52)	8.43
B - Starinagh Road (L5298)	6.73
C - Collon Industrial Park - Slane Road (N2)	5.99
Collon Business Park - Kells Road (N52)	5.61
Total	26.76 Ha

We also estimate that approximately 30% of the Collon Business Park remains vacant and/or undeveloped. It is noted Areas A to C are larger in area than the Collon Business Park. Whereas Areas A to C are zoned and within the village's existing/proposed settlement boundary the Collon Business Park is not.

Collon is identified in the draft Plan as a Level 4 settlement within the County's settlement hierarchy. Table 2.4 describes Level 4 settlements as small towns and villages with a local service and employment function. Section 2.17 of the draft Plan outlines small towns and villages have an important function in supporting local growth. Depending on the size, function and location of these settlements the employment provision varies. The draft Plan notes states all settlement in this category have a jobs ratio of less than 0.4 which '*... is an indication of a weak employment base and a dependence on outbound commuting for employment*'. Collon was noted as having a jobs ratio of 0.31 which was the highest job:workforce ratio in any of the Level 4 settlements but within context of its low population is still a small figure in quantitative terms. The draft Plan continues by outline the growth strategy for the small towns and villages will focus '*... on localised sustainable growth that meets the needs of the local population*'.

The current County Development Plan 2015-2021 provides additional information on the village's population and employment figures which are relevant when considering the appropriateness, need and scale of such much employment zoned lands.

Chapter 7, Appendix 2 cites a population of only 896 persons and a resident workforce of only 336 persons¹. The village was described as being set within a natural scenic landscape which is designated an Area of High Scenic Quality (AHSQ). It noted along the approach roads to the village there was a proliferation of ribbon development which weakened the urban form of the village. The Community Health Check survey carried out in 2018 noted approximately 30% of commercial property within the village were vacant. This estimate had likely reduced in the following years but not substantially.

It is submitted the overall quantum of E1 General Employment zoned lands is disproportionately excessive and superfluous to the village's local employment needs and its function as a Level 4 settlement in providing a '*... local service and employment function*'. Encouraging the development of so much land is, in our opinion, unjustified and beyond what Collon's weak job:workforce ratio would be capable of supporting. Furthermore development of this scale and nature is not in keeping with the draft County Plan's growth strategy for the small towns and villages which focuses '*... on localised sustainable growth that meets the needs of the*

¹ 2016 Census Data: Central Statistics Office, Dublin

local population'. It is submitted that many if not all of the business that would be attracted to a Business or Industrial Park setting would most likely to operate on a national or regional level rather than serving the local employment needs of the community and attract the majority of its workforce from beyond the village's limited workforce population. In essence these lands would have little if any connection to the local community. The scale of these zoned lands are more appropriately located in Level 1 or 2 settlements i.e. Dundalk, Drogheda or Ardee.

The origin of Areas A, B & C's zoning can be traced to the Objective 11 of the 2002 Collon Local Area Plan. This designation and subsequent zoning in the 2003-2009 County Plan progressed through successive reviews including the current 2015-2021 Plan. In the intervening eighteen years there has been no development carried out in Areas A & B. The lack any development in Areas A & C and the stagnated growth of both the Collon Business Park and Area C - Collon Industrial Park is sufficient evidence of a persistent lack of interest and need for such disproportionately excessive and redundant volumes of zoned lands.

It is submitted that Collon's future economic and employment growth can and should be accommodated within Collon Business Park and Area C - Collon Industrial Park exclusive of Areas A & B. Both Business and Industrial Parks have the benefit of being established for a number of years, have access to existing infrastructure, are located on 'brownfield' rather than undeveloped 'greenfield' sites and already form part of the surrounding physical and visual landscape and have sufficient capacity to develop further to meet any future economic and employment requirements within the lifespan of the draft County Plan.

The Submitters therefore request the rezoning of Areas A & B from E1 General Employment to L1 - Strategic Reserve or absorbed into Rural Policy Zone 1 and that all necessary revisions are made to the County Plan text in relation to the economic growth of Collon and/or small towns and villages.

The unnecessary development of Areas A and B would encourage development of significant tracts of land that promote and facilitate urban sprawl and the inappropriate industrialisation of the surrounding countryside that in addition to being contrary to the principles of proper and sustainable development would adversely impact upon the physical character and visual amenities of a highly sensitive landscape. In both the current and draft County Plans Collon is situated within an Area of High Scenic Quality (AHSQ No.4 - Collon Uplands). Section 8.11.2 of the draft County Plan notes AHSQ add significantly to the natural scenic lands of the County. The draft County Plan considers it important that AHSQs '*... are protected from excessive development ... in order to preserve their unspoiled rural landscapes*'.

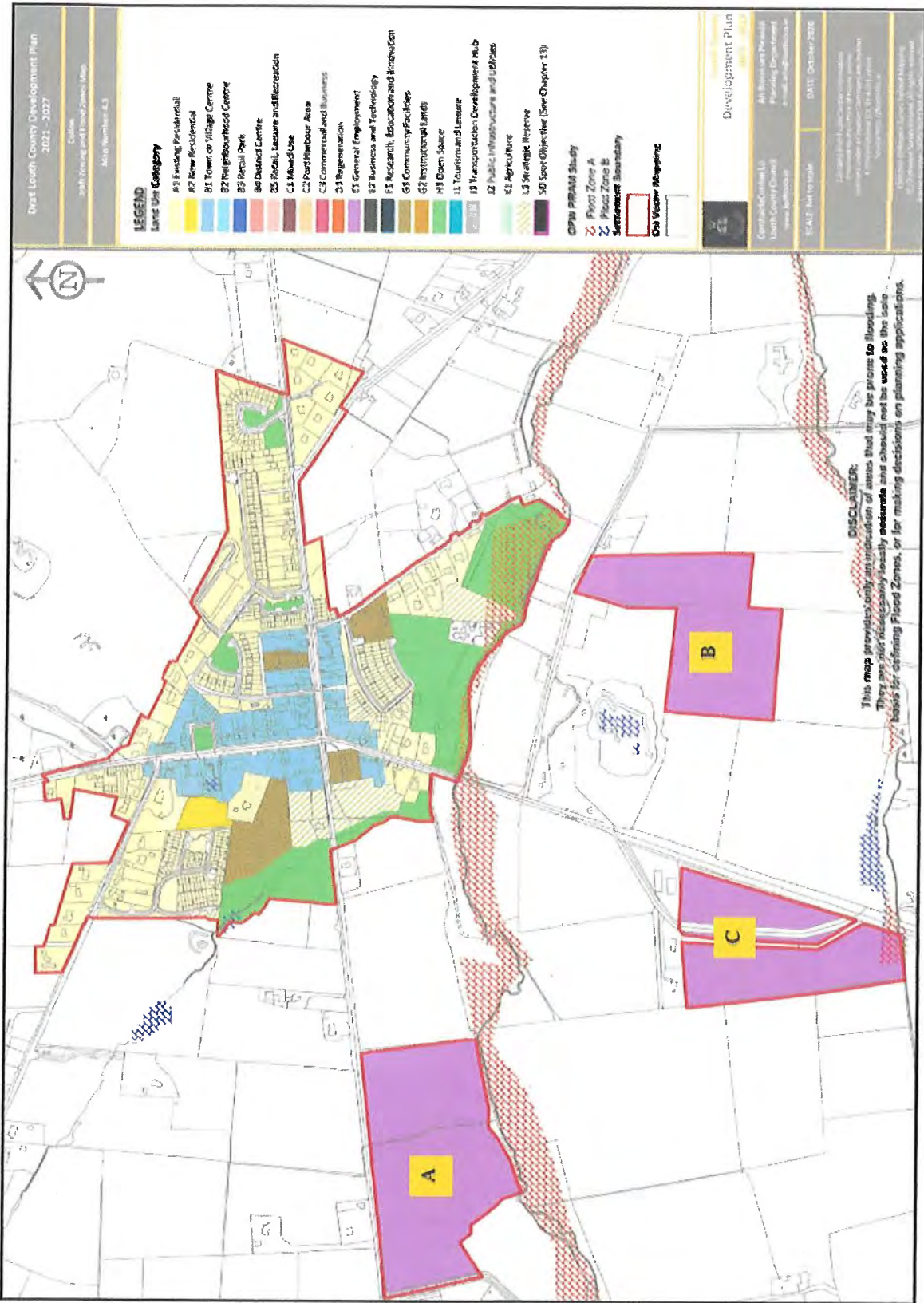
The introduction of large scale commercial/industrial buildings so far has been limited to Collon Business Park and the few structures within Collon Industrial Park. The continued zoning of Areas A & B as E1 General Employment would facilitate the inappropriate erosion and intrusion of these peripheral rural area's visual character and setting. The continued zoning of Areas A & B are fundamentally contrary to the objectives of Section 8.11 of the draft County Plan in particular the provisions of Policy NBG 37 which states:

NBG 37 To protect the unspoiled rural landscapes of the Areas of High Scenic Quality (AHSQ) from inappropriate development for the benefit and enjoyment of current and future generations.

Furthermore encouraging the development of these peripheral rural sites would generate large volumes of HGV traffic that neither the Kells Road (N52) or Starinagh Road (L5298) are capable of accommodating safely without creating potential traffic hazards and endangering other road users. Attracting additional HGV traffic through the village of Collon would only serve to exacerbate a well recognised and documented black spot at the cross roads between the N2, N52 and R168.

We hope the County Council is favourably disposed to our submission and will make the necessary alterations to Map 4.3 and any necessary language to the County Plan regarding economic and employment development in small towns and villages.

If the Forward Plans Team has any queries regarding the above submission please do not hesitate to contact us.



Map 1 – Collon draft Zoning Map 4.3

Source: Draft Louth County Development Plan 2021-2027