

Planning Department
Louth County Council
County Hall
Dundalk
County Louth

21 December 2020

**Re: Draft Louth County Development Plan 2021-2027
Submission on behalf of Genus Homes Ltd.,**

Dear Sir/Madam

This submission is made on behalf of Genus Homes in response to Louth County Council's request for submissions to the Draft Louth County Development Plan 2021-2027 (LCDP).

Genus Homes is currently implementing a planning permission for 205 residential units at Ballymakenny Road in the North Drogheda Environs. Some 68 units are currently under construction. Genus Homes welcomes the publication of the Draft County Development Plan and the restatement of the residential zoning of the North Drogheda Environs incorporating the subject Genus Homes lands.

This submission proposes the following amendments to the Written Statement of the County Plan (Volume 1) to align the Plan with national guidance on plan preparation and to ensure the ongoing delivery of new homes in north Drogheda pending the and subsequent to the preparation of the Drogheda UAP/LAP.

Proposed Amendment: Amendment of Section 2.13.6 'Northern Environs of Drogheda' as follows*:

'In this regard, there will be a requirement for a phased approach to be taken to the development of the northern environs. **Pending adoption of the UAP/LAP, the release of zoned residential land will be informed by** ~~in accordance with~~ the phasing arrangements set out in the 2006 Master Plan (which can be viewed at the attached [link](#)) **and the pattern of development established by the on-going implementation of extant permissions.** ~~or any subsequent Masterplan for the area.~~

'The development of these lands is closely linked to the provision of roads, new streetscapes, pedestrian and cycle networks and waster services infrastructure which will allow the Council to manage the phased release of the lands. **The UAP/LAP will incorporate relevant provisions relating to phasing having regard to these considerations, and these phasing provisions will replace those set out in the 2006 Master Plan.**

(*Proposed Amendments in **Bold**, proposed deletions in ~~strikethrough~~).

Directors:
Declan Brassil &
Sharon Gorman

Reg No.:
329512

1. Rationale for the Proposed Amendments

As noted, Genus Homes is currently implementing a planning permission for 205 residential units at Ballymakenny Road in the North Drogheda Environs. The permission was granted under LCC Reg. Ref. 08/368 for a period of 10 years, and was extended for a further 5 years to 2023 under LCC Reg. Ref. 18/635. Some 68 units are in the course of completion under an amendment permission granted under LCC Reg. Ref. 19/106. It is intended to make further amendment applications to better align the layout, design and unit mix with current national policy guidance, DMURS and current market expectations.

It is noted that there are a number of other extant residential permissions for residential development in the northern environs currently being implemented.

The principal purpose of the proposed amendments is to ensure that the delivery of housing in the North Drogheda Environs is appropriately supported by the County Development Plan pending adoption of the UAP/LAP, and by the UAP/LAP thereafter. In this regard, the UAP/LAP is the appropriate statutory land use plan to guide development and the phased release of the northern environs lands. The LAP Guidelines (2013) provide that '**Local area plans for newly developing areas, in particular, should include a sequential development and phasing programme linked with any necessary investment in water services, public transport, community facilities, and schools.**' [Emphasis added]

The phasing of land must have regard to the location and extent of established development. The Development Plan Guidelines (2007) state that the sequential approach to zoning should have regard to the following:

'(i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided);

*'(ii) **A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands;** and*

*'(iii) Areas to be zoned should be **contiguous to existing zoned development lands.**'* [Emphasis added]

These principles are relevant and appropriate to the northern environs landbank. The Draft Development Plan acknowledges that the northern environs zoned landbank is '*a fundamental part of the long term growth strategy for the town that will be developed over a number of development plans*'.

National guidance therefore establishes that the phasing of the northern environs landbank should be provided for in the UAP/LAP, and that the sequential approach to the phased release of zoned land must have regard to the established pattern of development.

In this regard, a number of extant permissions are being implemented in the northern environs area. These ongoing developments will establish a pattern of development that must inform the sequential phasing and release of lands in the UAP/LAP over the period of the UAP/LAP and subsequent plans. While the 2006 Masterplan applied a sequential approach to the phased release of lands, it is submitted that the phasing indicated in the Master Plan has been rendered almost obsolete by the pattern of development established by the implementation of extant permissions on the northern environs lands. In this regard, the established and establishing pattern of development has created infill and consolidation sites that may be more suitable for release for development than the phasing indicated in the 2006 Mater Plan, which has now been overtaken by events.

Accordingly, it is submitted that the determination of any applications for new development on the northern environs lands should be guided by the phasing provisions of the 2006 Masterplan **and** the established pattern of development in the area. The preparation of the UAP/LAP will establish an appropriate phasing strategy for the release of lands over the life of the plan and subsequent plans having regard to national policy and in particular the sequential approach that affords due regard to the established development context and pattern of development.

It is submitted therefore that the proposed amendments are appropriate to control and guide the release of residential lands and the ongoing delivery of new homes in advance of and subsequent to the adoption of the UAP/LAP.

I trust that the Council will afford due regard to this submission and I look forward to a favourable outcome.