

**Submission on the
Draft Louth County Development Plan 2021-2027**

On behalf of

Gem Construction

To

**Forward Planning Unit,
Development Plan Review,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth
A91 W20C.**

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1.0 INTRODUCTION / EXECUTIVE SUMMARY

- 1.1 We wish to make a submission on the Draft Louth County Development Plan 2021-2027 on behalf of our client Gem Construction, in respect to their landholding at Oriel Road, Collon, Co. Louth. Our client owns a landbank which is located within the village settlement of Collon and is currently zoned for agricultural use. While not within the defined settlement boundary of Collon, the subject site is located on the edge of the village centre and is more centrally located than a number of existing developments / zoned land which form part of the Collon settlement area.
- 1.2 Our client's landholding comprises of c. 2.12 hectares in size, as indicated in Figure 1 below and was previously zoned residential in the 2002-2008 Collon Local Area Plan. The site was also subject to a planning permission for 23 no. residential units under Reg. Ref.: 07/1311. However, in subsequent development plans the land was downzoned and the planning permission lapsed without being implemented due to the economic downturn from 2008 onwards.
- 1.3 This submission seeks to illustrate that the site represents an opportunity to consolidate new residential development at a sequentially preferable location on the immediate edge of the existing village. The submission and accompanying brochure prepared by McKeivitt King Architects illustrates the suitability of the subject site for a 'New Residential' zoning and residential development of c. 20 units per hectare **or** alternatively for a low-density residential zoning, which could cater for urban generated housing in the core of the village. A low-density zoning designation would have regard to national planning guidelines, would not distort the Core Strategy figures for the Level 4 settlements in the County, and would provide an alternative to the high demand for rural housing in the County, whilst consolidating and enhancing the Level 4 settlement of Collon.

Figure 1: Location of Landholding (Approximate Extent of Lands Outlined in Red)



Source: GoogleEarth

Submission Request

1.4 We have reviewed the contents of the Draft Plan as it relates to Collon and request the Planning Authority to consider the following:

- Incorporate a 'New Residential' land use zoning on the subject lands, similar to the previous zoning included under the Collon LAP 2002-2008. This would provide for a medium density development on the subject lands at a density of c. 20 to 35 units per hectare in accordance with national planning guidelines;

OR

- Alternatively consider a low-density residential zoning on the subject lands, which would provide an alternative to urban generated housing in the countryside, having regard to the recommendations of the National Planning Framework 2018 and the Sustainable Residential Guidelines 2008.

1.5 The accompanying brochure prepared by McKeivitt King Architects, which is attached as Appendix 1, indicates the development options which could be delivered on the site subject to an appropriate land use zoning in the new County Development Plan.

Gem Construction

1.6 The landowner in this instance is an established residential and commercial developer and construction company who operate in the Leinster and Dublin area. Gem Construction / Developments have delivered / constructed numerous high-quality residential developments, including the following recent projects:

- The Willows, Dunshaughlin- Housing and Apartment Scheme
- Knockrabo, Kilmacud, Dublin 14- Apartment and Housing Scheme
- Church Street, Dublin 7- Student Accommodation Scheme
- Hollywoodrath, Dublin 15- Housing Scheme
- Temple Wood, Carton Demesne, Co. Kildare- Lower Density Housing Scheme

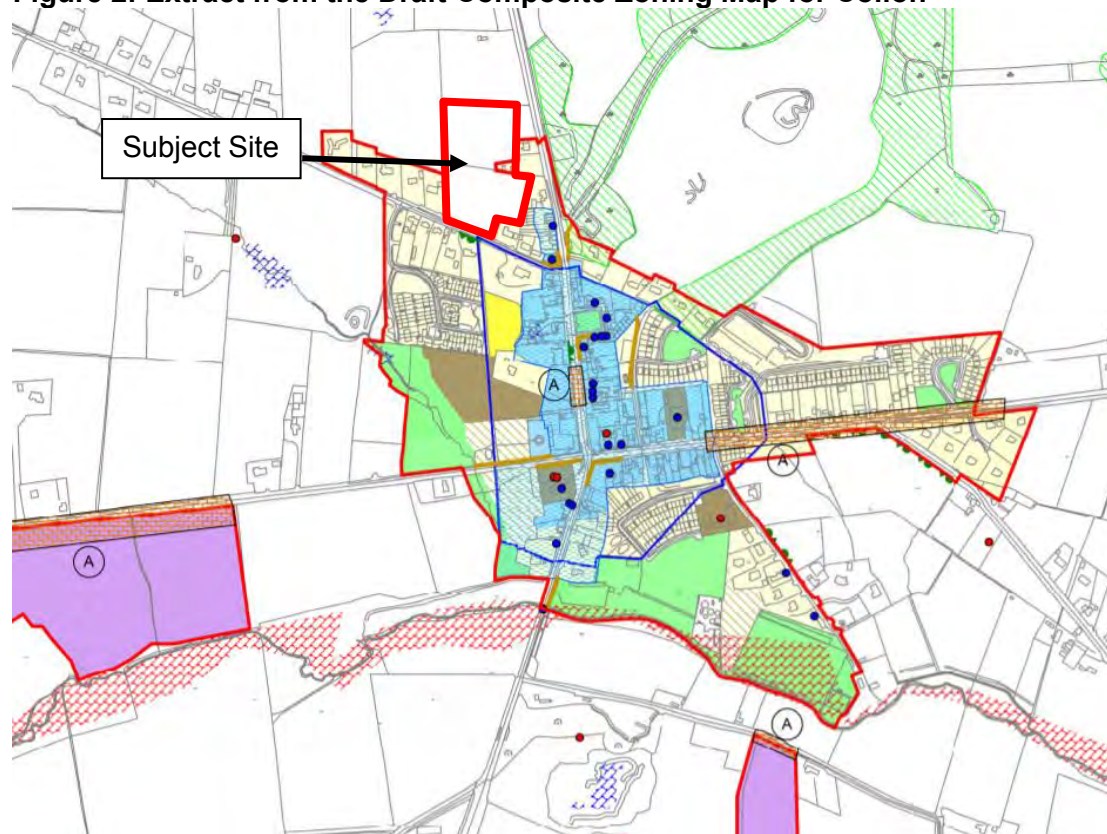
1.7 Thus, the landowner has the experience and capacity to deliver a high quality infill residential development on the subject lands in the short to medium term subject to an appropriate land use zoning. The landowner is committed to developing the subject lands in question, further evidenced by the previous grant of permission for development on site and the request to extend the duration of the permission, which was declined due to the subsequent downzoning.

2.0 SITE LOCATION AND PLANNING HISTORY CONTEXT

2.1 The subject lands are located on the edge of the village settlement of Collon and as such are readily serviced by the existing village infrastructure. The lands are greenfield in nature and not currently in use. The site has a slope from north to south and is not located within the Zone of Archaeological Potential (ZAP) or the Architectural Conservation Area (ACA) which pertains to Collon. The site is not identified as being at risk of flooding on the relevant flood zone maps pertaining to the area.

- 2.2 The site is bound to the east by a number of detached and terraced houses which bound Oriel Road and the main Ardee Road which runs through Collon village. To the west of the subject site along Oriel Road stands 5 no. detached houses in a linear form. It is noted that whilst the subject site is not located within the settlement boundary of Collon village, as identified in the draft land use zoning map, the aforementioned dwellings and land to the east, south and west are zoned 'Residential (existing)'.
- 2.3 The subject site would be considered an 'edge of centre' site in the context of the 2008 Sustainable Residential Development Guidelines and this submission seeks to demonstrate that they offer a suitable location for future residential development in respect to consolidating the village settlement of Collon and providing additional housing in a highly suitable location. Given that the site effectively forms a break in the zoned and developed area of Collon, as illustrated in Figure 2 below, i.e. being situated between zoned land to the east, south and west, the site should be zoned to provide for a suitable form of residential development in the new County Development Plan.

Figure 2: Extract from the Draft Composite Zoning Map for Collon



Source: Draft Louth County Development Plan 2021-2027

Planning History

Reg. Ref.: 07/1311

- 2.4 A final grant of permission for a residential development of 23 no. units, following revisions made at FI stage, was issued by LCC on the 18th of April 2008, on a c. 1.11 hectare site, i.e. the southern half of the overall landholding. At the time of the application, the subject site was zoned for residential development under the Collon LAP 2002-2008. All of the internal

departments recommended that permission be granted for the development, subject to conditions.

Reg. Ref.: 13/90

- 2.5 Permission for an Extension of Duration (EOD) of the above referenced permission was applied for prior to the permission expiring, as due to the economic downturn our client was not in a position to implement the permission. However, in the interim period the land had been downzoned in the Louth County Development Plan 2009-2015 and accordingly Louth County Council refused permission to extend the permission on the 22nd of April 2013. The reasons cited for refusal are as follows:

“Since the original permission was issued, 18th April 2008, there is a new Louth County Development Plan in place for the period 2009-2015 (as amended), likewise the Border Regional Planning Guidelines 2010-2022 have been adopted in the intervening period. On foot of the adoption of the Border RPGs and having regard to the Planning and Development (Amendment) Act 2010, there is a requirement for Planning Authorities to prepare a core strategy to ensure that the county development plan is consistent with the Regional Guidelines.

The Core Strategy as incorporated into the Louth County Development Plan 2009-2015 has identified that the projected housing demand in the Collon category 1 settlement is 2 hectares. The settlement Plan for Collon has made provision for this requirement. The subject site has been zoned ‘Strategic Reserve’. The strategy states that the zoning objective for such area is phase 2, i.e. land which will be reserved to allow proper planning and sustainable development in the next Plan period(s).

In accordance with Section 42(1)(a)(ii)(II) it is considered that the proposed development would contravene materially the zoning objective of the Louth County Development Plan 2009-2015 (as amended) and would be inconsistent with the proper planning and sustainable development of the area.”

- 2.6 In the interim period the strategic reserve zoning designation has been removed from the subject site under the 2015 CDP and the now proposed Draft 2021-2027 CDP. This submission requests that the Planning Authority consider zoning the subject lands for residential development as discussed in Section 3 and 4 below.

3.0 DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

- 3.1 The following provides a summary of the relevant elements of the Draft CDP as it relates to the requests made in this submission in respect to our client’s infill site which is located in an ‘edge of centre’ location within Collon village.

Core Strategy, Settlement Strategy and Development Hierarchy

- 3.2 Under the proposed settlement hierarchy, Collon is designated as a ‘Small Town and Village’, which is a Level 4 settlement and which are further defined as supporting ‘local growth across the County and range in size and function’. In previous Plans Collon was designated as a Level 3 settlement. The settlement hierarchy for the County has been realigned to coincide with the RSES.

- 3.3 The Draft Plan states that for Level 4 settlements that future growth will focus on localised sustainable growth meeting the needs of the local population and as such, the future growth of Collon shall be required to address the needs of the local population rather than the wider Louth area. As is demonstrated within this submission, local demand for housing is increasing, and whilst population statistics are only most recently available from the 2016 census, they have demonstrated a clear pattern of local population growth which is increasing at a greater rate than the national average whilst the provision of new housing units to cater for this demand has been minimal.
- 3.4 The RSES have factored in a population growth of between 12,500 – 19,375 between 2016 and 2026 (including the permitted 25% headroom growth figure) for County Louth, with an emphasis on growth within existing urban areas. Section 2.5.3 of the Draft Development Plan uses this figure to calculate the 2027 population for the county at 149,966 persons.
- 3.5 The eight Level 4 small towns and villages, which includes Collon, are projected to have a total population increase of 71 per annum between 2016-2027, resulting in a total increase of 785 people between 2021 and 2027 to reach a total population of 5,888, which is 3.7% of the projected total growth in the county over the lifespan of the 2021-2027 plan. As there is no breakdown provided for each individual Level 4 settlement, an even split of this allocation across all eight Level 4 settlements results in a projected increase in population of c. 98 people per settlement if applied evenly.
- 3.6 Table 2.12 of the Draft Development Plan indicates that given an average household size in Louth of 2.6 inhabitants, there is a projected requirement for 8,278 new houses between 2021-2027 for the county, with 414 units (5%) of these allocated to Level 4 settlements.
- 3.7 However, it is noted that a number of these settlements have had stagnant levels of population growth and new residential units permitted since 2015, in addition to greatly differing populations. As such, it would be inappropriate to assume an even distribution of allocated units, particularly for settlements located closer to the larger urban centres of Dundalk and Drogheda, and the Dublin Metropolitan Area, which in turn have a greater demand for housing. The table below demonstrates the population gain and level of residential development in each Level 4 settlement.

Table 1: Level 4 Settlements in Louth

Settlement	2016 Population	2011-2016 Population Change	Residential Units granted since 2015
Annagassan	201	N/A	0
Baltray	132	28%	25
Collon	846	10.1%	1
Dromiskin	846	10.1%	44
Knockbridge	667	14.4%	0
Louth Village	735	2.8%	5
Omeath	603	19.9%	0
Tallanstown	673	0.1%	14

- 3.8 Table 2.1 of the Draft Plan details the housing allocation of 414 units for the Level 4 settlements across the new plan period, spread across 21 hectares of lands zoned for New Residential Uses. Further to this, there are 24.1 hectares of land identified for infill or brownfield development, with 260

residential units delivered on these lands. It is relevant to note that there is no specific breakdown for each Level 4 settlement. As such, the Draft Plan suggests that development across all eight settlements will need to be monitored ensure that Policy COL 2 *'To secure the implementation of the Core Strategy of the Draft County Development Plan, in so far as is practicable, by ensuring the housing allocation for Collon is not exceeded'*, is met (there is a similar policy in place for the remaining 7 level 4 settlements).

- 3.9 There are 21 hectares of land zoned *'New Residential'* within Level 4 settlements, and as such if it is assumed that all 414 units within the housing allocation are to be constructed on these lands, this will result in an average density of 19.7 units per hectare.
- 3.10 Section 2.5.2 of the Development Plan is titled *'Location of Population Growth'* notes that over the 2011-2016 intercensal period, 53% of population growth took place in lower tier settlements (which includes small towns and villages), which is *'indicating the pressure for development within these areas'*. Whilst the population distribution planned for in the Draft Development Plan notes that 22% of the projected population growth will be targeted to *'Self Sustaining Towns, Towns and Villages and the Rural Area'*.

Small Towns and Villages

- 3.11 Section 2.17 of the Draft Plan relates specifically to Small Towns and Villages, which includes Collon. With regard to residential development, section 2.17 states that *'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. New development in settlements that have experienced high levels of growth in recent years will be carefully managed to avoid the creation of commuter settlements'*. It further notes that while the 8 small towns and villages in Louth have a weak employment base, Collon has the second strongest base of these 8 villages.
- 3.12 We note that the parcel of land currently zoned for new residential development in Collon is in a far more constrained location for development than the subject site and would be reliant on access through other lands given it is bounded by development on all sides. Furthermore, this zoned land has been zoned for *'new residential'* over a number of plan periods and has not come forward for development, so the Planning Authority should consider if it is appropriate to retain this zoning in the context of the land management requirements set down in the Planning and Development Act 2000, as amended, and Rebuilding Ireland.

Rural Housing

- 3.13 The Growth Strategy for Louth is detailed in section 2.4.4 of the Draft Plan and prioritises growth for the county within Dundalk and Drogheda. With regard to growth in small towns and villages, the Plan states that *'Having regard to the viability and vibrancy of small towns and villages, promotion of regeneration and support for local employment whilst offering a viable alternative to single housing in the open countryside'*. As such, any proposals for growth within small towns would need to demonstrate that it is a viable alternative to one-off houses in order to minimise their further proliferation.
- 3.14 Section 2.6.6 of the Draft Plan advocates compact growth in line with the objectives of both the NPF and the RSES. Whilst this predominantly relates to

urban centres, the plan also states that it will ‘*contribute to sequential, sustainable and compact growth, revitalisation of existing settlements of all scales and transition to a low carbon, climate resilient society*’. The site the subject of this submission is located centrally within the settlement of Collon and is bound by residential zoned land to the east, south and west. A residential zoning of the subject site would help consolidate the settlement of Collon and deliver upon the compact growth objective. The site can also be deemed to constitute an infill site and could offer an alternative to urban generated housing in rural areas if specifically designated for lower density housing, which in turn would not adversely impact on Core Strategy figures for population growth in the County. As such any development on the subject site would significantly contribute to the sequential, compact and sustainable development of the town.

Other Relevant Policies of the Draft Plan

- 3.15 The following policy objectives of the Draft Plan are also noted in the context of the requests made in this submission to zone our client’s infill site in Collon for residential development.

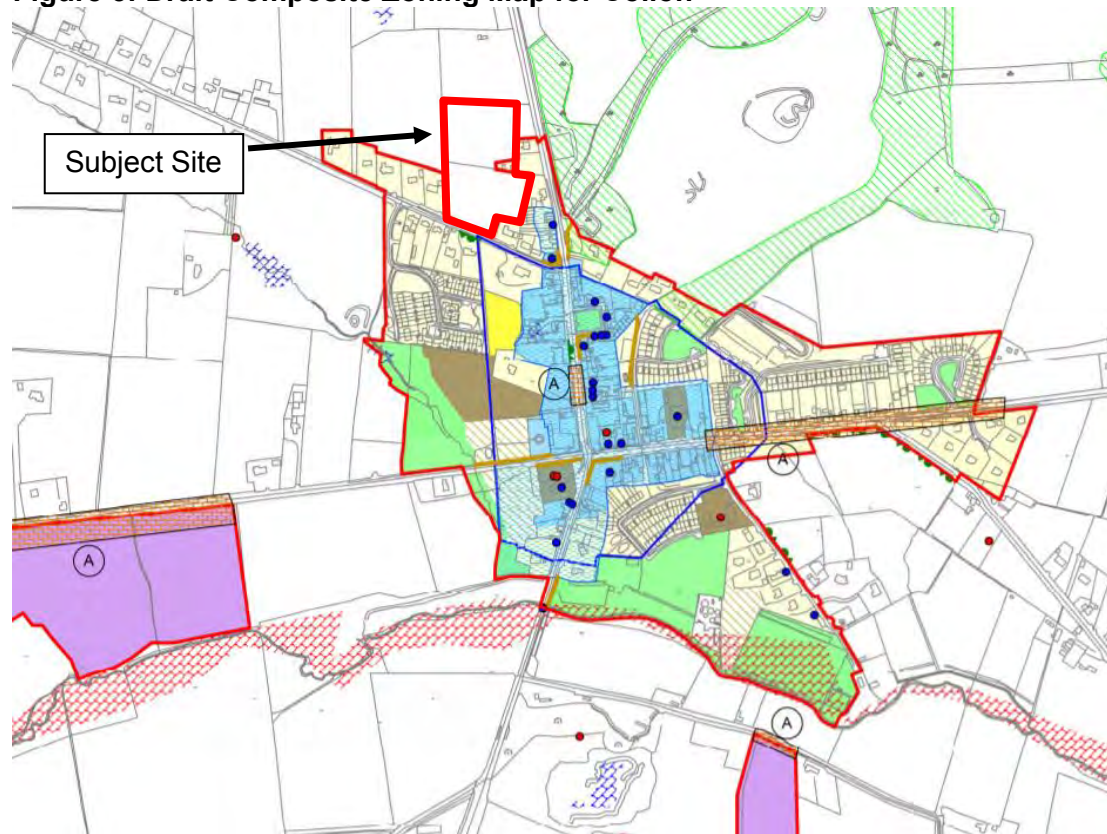
‘Policy Objective SS 54- To support and facilitate balanced and proportionate population and economic growth in the Self-Sustaining Growth Towns, Small Towns and Villages, and Rural Villages that will meet the needs of the residents of the settlements identified each of the settlement categories.’

‘Policy Objective SS 55- To support the creation of vibrant rural communities by promoting and targeting sustainable growth in rural towns and managing the growth of rural areas under pressure for development’.

‘Policy Objective SS 62- To encourage the re-use and rejuvenation of vacant and under-utilised lands in rural towns and villages for appropriate uses’.

Collon Specific

- 3.16 As noted, there is no longer a specific housing allocation for Collon, instead a total allocation for all the Level 4 settlements. Volume 2 of the Draft CDP relates to ‘*Written Statement and Maps – Small Towns and Villages*’, of which Collon is categorised under ‘*Small Towns and Villages*’.
- 3.17 As noted in Section 2 above, and illustrated in Figure 3 below, the subject site is not proposed to be zoned for development or located within the settlement boundary of Collon village in the draft land use zoning map for Collon contained in the Draft CDP. However, as illustrated in the draft land use zoning map extract below, the subject site is bound by zoned ‘*Residential (existing)*’ land to the east, west and south and the village core is located c. 100 metres to the south east.

Figure 3: Draft Composite Zoning Map for Collon

3.18 With specific regard to Collon, Table 8.1 provides a settlement overview and details that the population of the village grew by 10.1% over the 2011-2016 intercensal period. Whilst no figures regarding population increase are available for the period since, it is considered reasonable to assume that the population of Collon has continued to rise, given its rate of growth over the intercensal period exceeds both that of the national rate (3.8% increase) and that of County Louth as a whole (4.9% increase). However, it is noted that only 1 no. residential unit has been granted permission since 2015. It is noted that over this same period 88 no. residential units have been granted permission in other Level 4 settlement, as previously detailed in Table 1.

Housing within Collon

3.19 Section 8.3 relates to settlement and housing within Collon and states that *'Collon experienced considerable development pressure in the 1990's and the first half of the 2000's. In recent times, residential development has been limited. The land use strategy for Collon seeks to consolidate the existing village form through the development of infill and brownfield lands'*. The subject site is an infill site, located in an 'edge of centre' location within Collon, and its zoning and development would help consolidate the existing village form of Collon and has the potential to provide an alternative to further urban generated, ribbon development in the surrounding countryside to meet the local housing needs. The zoning of the subject would be consistent with the zoning of the residential developments to the east and west of the site and provide the opportunity to create a more cohesive townscape and consolidate the village settlement of Collon.

3.20 The following are specific objectives relating to Collon, which are of relevance to this submission and the request to zone our client's landholding for residential development.

'Policy Objective COL 1 - To support the role of Collon by facilitating development that will contribute to the character and structure of the village and complement and enhance the quality of the village's attractive built and natural environment'.

'Policy Objective COL 2 - To secure the implementation of the Core Strategy of the Draft County Development Plan, in so far as is practicable, by ensuring the housing allocation for Collon is not exceeded'.

'Policy Objective COL 3 - 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'.

- 3.21 As noted previously, Collon is now designated as a level 4 settlement (small towns and villages), while in previous plans it had been designated level 3. The changes to settlement categorisation reflects the draft plans alignment with the NPF and the RSES. With regard to small towns and villages, section 2.3.2 of the core strategy states that *'Small Towns and Villages support local growth across the County and range in size and function. Future growth will focus on localised sustainable growth meeting the needs of the local population'*.

OTHER RELEVANT PLANNING POLICY DOCUMENTS

- 3.22 In the context of the requests made in Section 4 below, we note the following national, regional and ministerial planning policy and guidelines which are relevant to the requests made in this submission and to the finalisation of the Louth County Development Plan 2021-2027.

National Planning Framework - 2040

- 3.23 The National Planning Framework (NPF), as the core planning document for Ireland, forms the basis upon which County Development Plans and Local Area Plans must be formed. Accordingly, the new Louth County Development Plan must be consistent with the relevant National Policy Objectives as contained within the NPF in the formulation of the 2021-2027 plan. The following National Policy Objectives are considered to be of particular relevance to the zoning and location of residential development in rural towns and villages, and are relevant to the requests made in Section 4 of this submission.

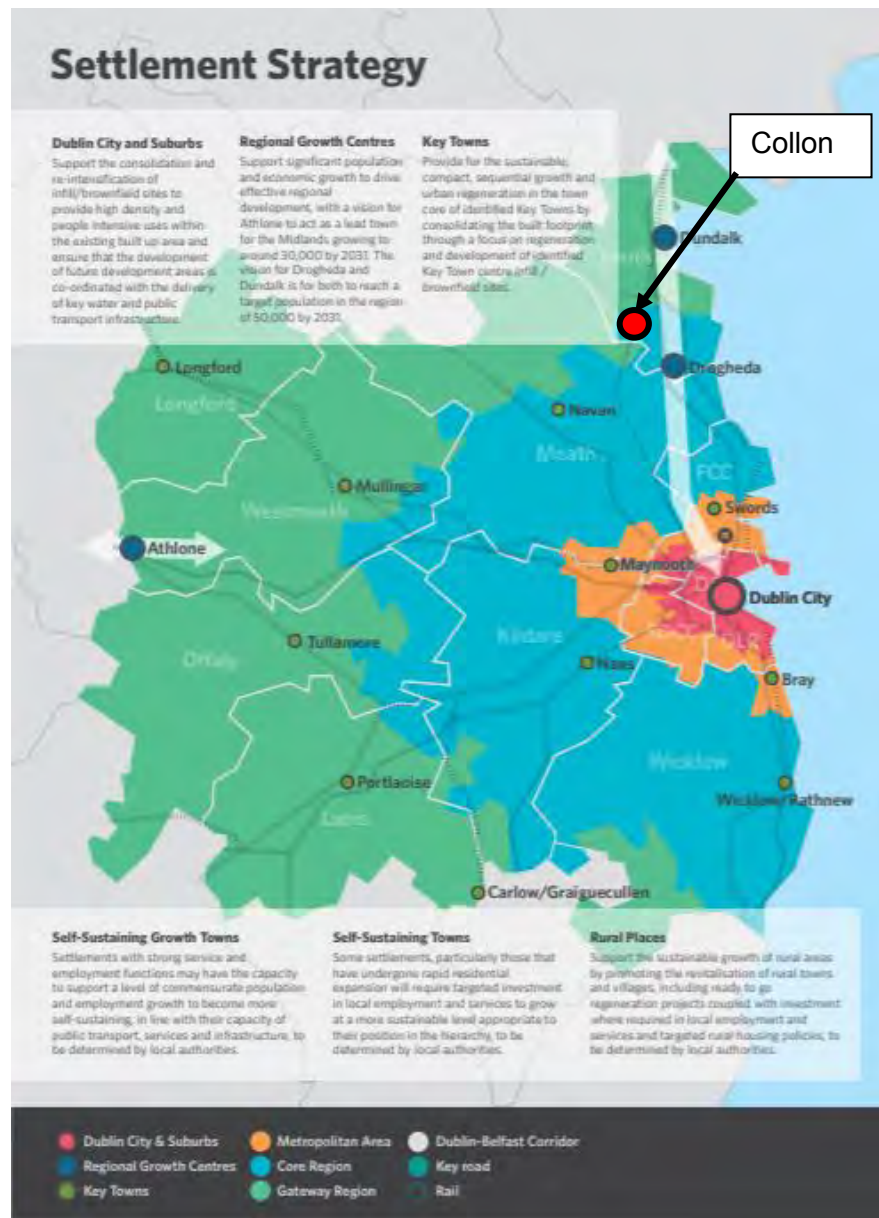
"National Policy Objective 18a - To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services."

"National Policy Objective 18b -Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages."

Regional Spatial and Economic Strategy for the Eastern and Midland Region

- 3.24 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region has been prepared by the Eastern and Midland Regional Assembly (EMRA) and provides for regional guidance for spatial development of the most populated region in Ireland. The RSES identify Collon as being located within the 'Core Region' area of the Eastern and Midlands Region, as illustrated in Figure 4.
- 3.25 The Core Region is defined as 'the peri-urban 'hinterlands' within the commuter catchment around Dublin, which covers the Eastern counties and extends into the Midlands, north into Louth and south beyond the Region into Wexford. The Core Region is home to over 550,000 people with some of the youngest and fastest growing towns in the Region and the State'.

Figure 4: Collon in the context of the Settlement Strategy Map of the RSES



3.26 The following objective is considered relevant to this submission:

“RPO 4.78: Development plans should support the development of a ‘New Homes in Small Towns and Villages’ initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create ‘build your own home’ opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.”

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) 2009 (abbreviated as SDRUA hereafter)

3.27 The Section 28 Ministerial Guidelines, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) 2009, acknowledge in Section 6 that edge of centre village sites in village settlements such as Collon should achieve densities of 20-35 dwellings per hectare including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation.

3.28 Section 6 of the SDRUA Guidelines also acknowledge that villages such as Collon can proactively cater for urban generated housing, specifically stating the following:

“(d) Offering alternatives to urban generated housing

In some limited circumstances, notably where pressure for development of single homes in rural areas is high, proposals for lower densities of development may be considered acceptable at locations on serviced land within the environs of the town or village in order to offer people, who would otherwise seek to develop a house in an unserviced rural area, the option to develop in a small town or village where services are available and within walking and cycling distance.”

Conclusions

3.29 The NPF and RSES objectives identified above and the requirements of the SDRUA S. 28 Ministerial Guidelines, support a more proactive approach to new development in smaller settlements. It is respectfully submitted that this should be reflected in the new Louth County Development Plan through the introduction of appropriate residential zonings on infill sites in village and town centres, such as the subject site in Collon, as discussed in greater detail in Section 4 below.

4.0 SUBMISSION REQUESTS- AMENDMENTS TO THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN

4.1 In the context of the preceding sections of this submission and the accompanying brochure prepared by McKevitt King Architects, this section of the submission requests that the Planning Authority consider introducing a ‘New Residential’ zoning or a ‘Low Density Residential’ zoning on the subject site through a proposed amendment to the Collon section of the Draft CDP and specifically the draft land use zoning map for Collon, having regard to the following:

- The edge of centre site location within the village of Collon;

- The previous zoning of the site for residential development under the 2002-2008 Collon Local Area Plan and previous planning permission which provided for 23 no. residential units on part of the site;
- The need to proactively plan for provision of services and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand and to offer an alternative to urban generated rural housing, particularly in settlements such as Collon which is located within the 'Core Region' as identified in the EMRA RSES, with a recognised demand for new housing in all settlements;
- The potential to consolidate the settlement of Collon through either a medium density residential zoning on the subject site which would provide for between 20-35 units per hectare; **or**
- Alternatively providing for a low density residential zoning which could provide for residential development at a density of c. 10 units per hectare, providing serviced sites in the centre of Collon as an alternative to urban generated housing in the Countryside.

Request No. 1- New Residential Zoning

- 4.2 With reference to the attached brochure prepared by McKeivitt King Architects, we request the Planning Authority to introduce a 'New Residential' land use zoning on the subject site which could provide for a medium density residential development of between 20 to 35 units hectare which would be appropriate to a village settlement such as Collon having regard to the recommendations of the SDRUA Guidelines.
- 4.3 The medium density option, as illustrated in the attached brochure prepared by McKeivitt King, could deliver a mix duplex, terrace, semi-detached and detached units in a 40 unit scheme over the c. 2 ha site. Such an approach would accord with the SDRUA Guidelines, which acknowledge in Section 6 that edge of centre village sites in village settlements such as Collon should achieve densities of **20-35 dwellings per hectare** including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation.
- 4.4 The following sub-sections provide a rationale for the requested introduction of a 'New Residential' zoning objective on the subject site as a proposed amendment to the Draft Plan.

Existing Pattern of Development

- 4.5 Section 2 of the Draft County Development Plan and national planning policy supports a sequential approach to residential development in our existing cities, town and villages. The subject site is located adjacent to the developed village centre of Collon and is bound by existing residential zoned land and the settlement boundary of the village to the east, south and west. As such, the site can be considered to constitute an infill site.
- 4.6 The rezoning of the subject site would therefore be consistent with Section 2.17 of the Draft CDP which requires that '*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*', and Collon specific Policy 3 which seeks '*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*'. Thus, the zoning of the

subject site would be consistent with the sequential approach to residential development and help consolidate and provide for compact growth in Collon.

Less Preferable Residential Land Zoning Within Collon

- 4.7 As demonstrated in this submission, the subject site can be classified as an infill site, with no physical constraints to development and with a landowner who is an established developer of residential homes. Thus, the zoning of the subject site would provide for new homes within the centre of Collon within the lifetime of the new Development Plan.
- 4.8 As recommended in Appendix 3 of the NPF, planning authorities should employ a ‘*tiered approach to land zoning*’, as part of their Development Plan preparation process. With Tier 1 and 2 lands defined as follows:
- **Tier 1 lands-** *This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services. Inclusion in Tier 1 will generally require the lands to within the footprint of or spatially sequential within the identified settlement.*
 - **Tier 2 lands-** *This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.*
- 4.9 With regard to the above criteria for identifying lands, our client’s site at Collon would fall under the Tier 1 lands designation. The site connects directly to an existing footpath and road which are accompanied by public lighting. The previous residential permission granted on site provided for connections to the existing Collon drainage network and to the foul main running along Oriel Road. Any new residential development on the site could connect to these existing services.
- 4.10 In considering where to provide for future population growth and housing in the County, the Planning Authority is required to undertake active land management reviews and prepare a land availability, capacity and infrastructural study to inform the new Core Strategy and Housing Strategy. In this respect, the Planning Authority are required to consider whether some current residential zoned land should be considered for other uses, for reasons including the following:
- The lands have not been brought forward for development during one or more Development Plan periods
 - The lands are not serviced at present and there are difficulties in delivering infrastructure in a timely and cost-effective manner

- The landowners may not be actively involved in residential development or have no intention of selling the lands for residential development
- The lands are sequentially less suitable for development when considered against other unzoned lands in the County

4.11 We note that there is only one site identified as 'New Residential' zoned land in the draft land use zoning map for Collon, as illustrated in Figure 5 and 6 below.

Figure 5: New Residential Zoned Land within Collon

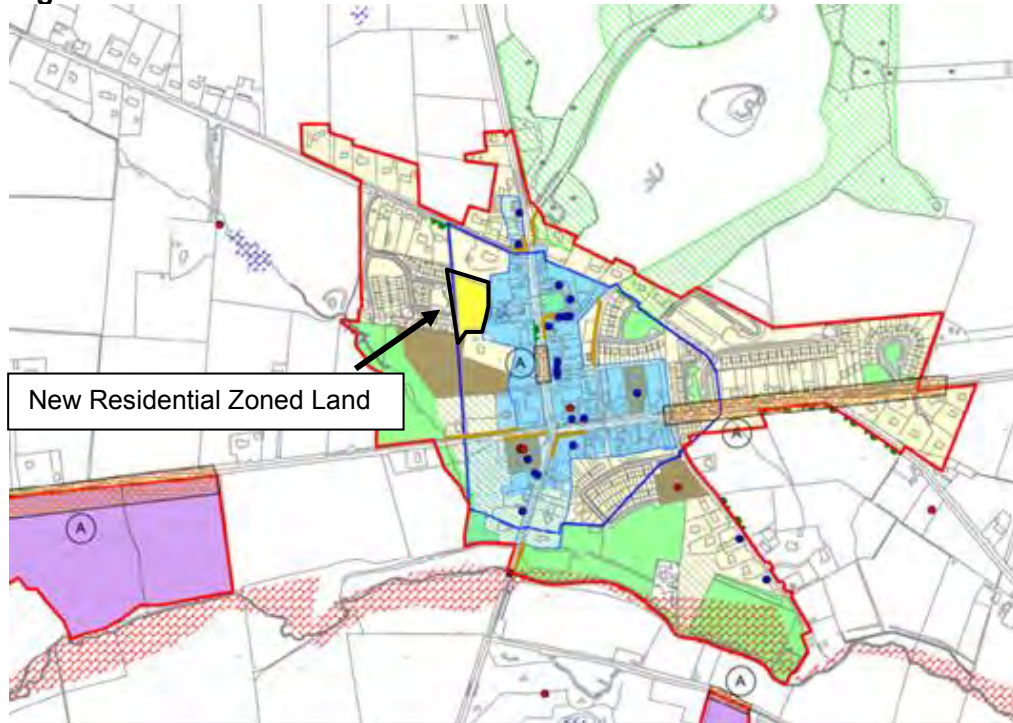


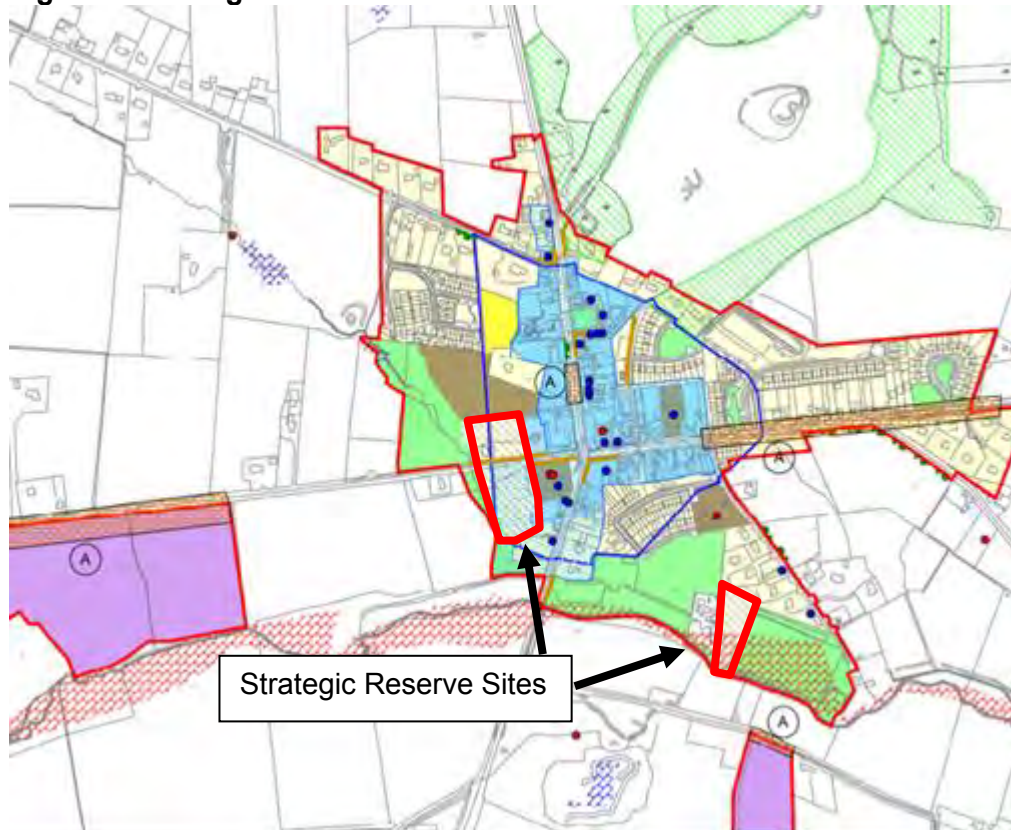
Figure 6: Aerial View of New Residential Zoned Land in Collon



- 4.12 The current parcel of land zoned for 'New Residential' development is located within the built up area of Collon and would constitute a greenfield, infill site. However, we note that the site is bounded by development on all sides with access seemingly only readily available from the existing 'Doire Beag' social housing development constructed by Cluid to the west. Given access is only through Doire Beag, these lands are located c. 550 metres walking distance from Ardee Street, whereas our client's site is located c. 150 metres at their point of entrance from Oriel Road, and are therefore sequentially preferable.
- 4.13 The small landbank zoned 'New Residential', has been zoned as such over the course of the previous development plans, however there is no evidence of any development being brought forward on this site, with no evident planning history.
- 4.14 Therefore, in accordance with Section 2.4.3 of the Draft Plan (*'Where there are sites with long term development potential not being brought forward for development, the RSES acknowledges that local authorities should consider other suitable, alternative sites capable of being delivered in the short term'*) and pg. 50 of the RSES (*'Effective ways to tackle any tendencies towards land and/ or planning permission hoarding or excessively slow delivery include measures such as the Vacant Site Levy and the release of alternate lands where permitted development, without any wider delivery constraints, is not being brought forward'*), we request the Planning Authority to reconsider the zoning of these 'New Residential' lands as designated in the draft plan and instead apply this land use zoning to our client's lands based on the guidance set down in the NPF, as summarised above.

Strategic Reserve Sites

- 4.15 There are two strategic residential land banks identified on the southern side of Collon, as illustrated in Figure 7 below. The strategic residential reserve is designated *"to provide a land reserve for the orderly expansion of the settlement into the future"*.
- 4.16 The easternmost site is partially located within a flood zone and would constitute Tier 2 lands under the NPF criteria given their lack of current connectivity to existing infrastructure. The western strategic reserve is split by an existing roadway and experiences a north-south drop in gradient. There is no development history on either of these sites while both appear to have significant physical constraints.
- 4.17 The subject site was previously designated as a strategic reserve within the 2009 – 2015 County Development Plan, however this designation no longer applies. It is respectfully submitted, that the subject site offers a more suitable location for development than the two existing strategic reserves having regard to the guidance set down in the NPF. The subject site is considered more appropriate for residential development in the short and medium terms than the 'New Residential' and 'Strategic Reserve' sites and we therefore request the Planning Authority to reconsider these aspects of the land use zoning map for Collon when preparing proposed amendments to the Draft CDP.

Figure 7: Strategic Reserve Residential Lands in Collon

Core Strategy Population Figures

- 4.18 As detailed within Section 3 of this submission, the core strategy population figures for Level 4 Settlements is 785 people, with a housing allocation of 414 units for the 2021-2027 period. There is no further breakdown provided as to how these 414 units are to be distributed between the eight Level 4 settlements. The subject site has the potential to accommodate a residential development at 20 units per hectare, under a medium village density as illustrated in Appendix 1, which would equate to 40 units or 10% of the total housing allocation for the Level 4 settlements in the County.
- 4.19 Given that 53% of population growth over the intercensal period was located in lower tier settlements, and that the population of Collon grew 10.1% over this same period, the introduction of a 'New Residential' zoning on the subject site would provide a pragmatic solution to meeting the 'pressure for development' within these lower settlement tiers and provide sustainable, sequentially preferable, infill residential development, as part of meeting the 22% of population growth allocation targeted to 'Self Sustaining Towns, Towns and Villages and the Rural Area'.

Previous Planning History and Zoning

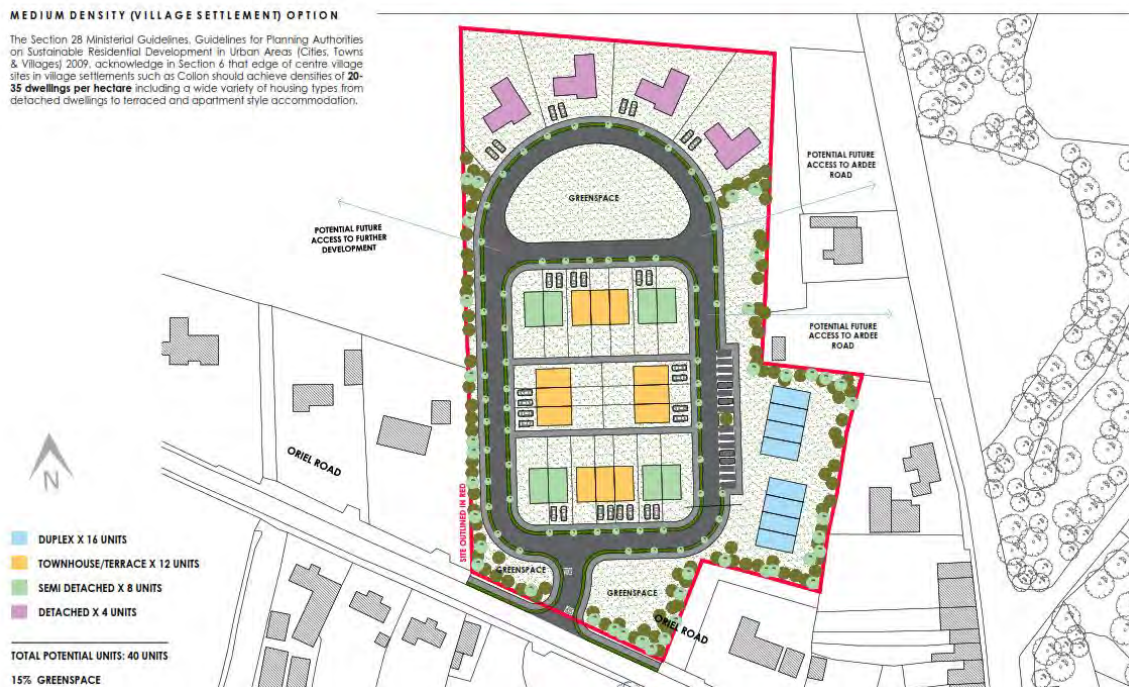
- 4.20 Our client's landholding comprises of c. 2.12 hectares in size and was previously zoned residential in the 2002-2008 Collon Local Area Plan. The site was also subject to a planning permission for 23 no. residential units under Reg. Ref.: 07/1311. However, in subsequent development plans the land was downzoned and the planning permission lapsed without being implemented due to the economic downturn from 2008 onwards. Given the planning history on site, the land ownership and the potential to deliver a high

quality infill residential scheme, as illustrated in the accompanying McKeivitt King brochure, it is apparent that subject to a 'New Residential' zoning that residential development could be delivered in the short term and to a high standard.

Medium Density Residential Development Option

4.21 As illustrated in the accompanying Development Strategy Brochure prepared by McKeivitt King Architects, and Figure 8 extract below, the subject site could accommodate a medium village density residential development which would deliver a range of housing typologies and provide for high quality infill development within the core of Collon village.

Figure 8: Medium Density Development



4.23 The draft proposal consists of 40 no. dwellings across a broad range of unit types. The proposal retains a high degree of existing planting and hedgerows across the site, and includes the provision of quality open space. While the site is accessed via Oriel Road, similar to the previously permitted development, additional permeability towards Ardee Road is possible in the future given the proposed site layout.

4.24 The density of development, at c. 20 units per hectare, is in line the recommendations of the Core and Settlement Strategy of the Draft Plan and the 40 no. units would represent less than 10% of the total housing allocation for Level 4 settlements. The zoning of the subject site for 'New Residential' would be consistent with Policy 3 of the Draft Plan and specific policies COL 1, COL 2 & COL 3 relating to Collon.

Request No. 2- Low Density Residential Zoning

4.25 Should the Planning Authority have concerns in respect to the zoning of the subject lands under the 'New Residential' zoning, which could deliver a total of c. 40 to 70 units based on an average density of 20 to 35 units per hectare, based on the Core Strategy population figures for the Level 4 settlements it is

suggested that a low-density residential zoning should be considered. A low-density residential zoning would be consistent with the recommendations under the SDRUA Guidelines for small towns and villages by providing specifically for individual family homes on serviced sites, but within the centre of the settlement of Collon, thereby offering an alternative to urban generated housing.

- 4.26 The provision of a 'Low Density Residential' (Alternative to Urban Generated Housing) land use zoning would be consistent with Section 6 of the Guidelines which acknowledge that villages such as Collon can proactively cater for urban generated housing, specifically stating the following:

“(d) Offering alternatives to urban generated housing

In some limited circumstances, notably where pressure for development of single homes in rural areas is high, proposals for lower densities of development may be considered acceptable at locations on serviced land within the environs of the town or village in order to offer people, who would otherwise seek to develop a house in an unserviced rural area, the option to develop in a small town or village where services are available and within walking and cycling distance.”

- 4.27 Further to this and with specific regard to small towns and villages, Section 6.12 of the Guidelines states that *“In order to offer an effective alternative to the provision of single houses in surrounding unserviced rural areas, it is appropriate in controlled circumstances to consider proposals for developments with densities of less than 15 - 20 dwellings per hectare along or inside the edge of smaller towns and villages, as long as such lower density development does not represent more than about 20% of the total new planned housing stock of the small town or village in question.”* (Emphasis added)

- 4.28 The inclusion of a 'Low Density Residential' zoning on the subject site would also be a proactive response to the following objective of the National Planning Framework by providing an alternative to dispersed rural housing within the core of the village of Collon:

“National Policy Objective 18b - Develop a programme for ‘new homes in small towns and villages’ with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.”

- 4.29 The lower density approach also complies with policies and objectives contained within the Draft Development Plan, namely Policy Objective CS 15 which seeks *‘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’* and Policy Objective CS 16 *‘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 for in the Development Plan’.*

- 4.30 We note that a similar approach to catering for urban generated housing on serviced sites in small towns and villages has been adopted in other Planning Authorities in Ireland in response to the NPF, RSES and Ministerial Guidelines. For example, the Wicklow County Development Plan 2016-2022

5.0 CONCLUSIONS

- 5.1 This submission on the Draft Louth County Development Plan 2021-2027 has been prepared on behalf of our client Gem Construction who own an unzoned parcel of land adjacent to the village centre of Collon, which is considered suitable for residential development during the lifetime of the next Development Plan.
- 5.2 Our client's landholding comprises of c. 2.12 hectares in size and was previously zoned residential in the 2002-2008 Collon Local Area Plan. The site was also subject to a planning permission for 23 no. residential units under Reg. Ref.: 07/1311. However, in subsequent development plans the land was downzoned and the planning permission lapsed without being implemented due to the economic downturn from 2008 onwards.
- 5.3 This submission seeks to illustrate that the site represents an opportunity to consolidate new residential development at a sequentially preferable location on the immediate edge of the existing village. The submission and accompanying brochure prepared by McKeivitt King Architects illustrates the suitability of the subject site for a 'New Residential' zoning and residential development of c. 20 units per hectare or alternatively for a low-density residential zoning, which could cater for urban generated housing in the core of the village.
- 5.4 Accordingly, we respectfully request that the Planning Authority consider amending the Draft Plan as it relates to Collon to provide for the following:
- Incorporate a 'New Residential' land use zoning on the subject lands, similar to the previous zoning included under the Collon LAP 2002-2008. This would provide for a medium density development on the subject lands at a density of c. 20 to 35 units per hectare in accordance with national planning guidelines;
- OR**
- Alternatively consider a low-density residential zoning on the subject lands, which would provide an alternative to urban generated housing in the countryside, having regard to the recommendations of the National Planning Framework 2018 and the Sustainable Residential Guidelines 2008.
- 5.5 We would be happy to discuss the contents of this submission with the Planning Authority should that be of assistance.

Yours sincerely,

John Spain Associates

APPENDIX 1: MCKEVITT KING DEVELOPMENT STRATEGY BROCHURE

DESIGN STATEMENT

G263 -- GEM Construction

Oriel Road, Collon,
County Louth



MCKEVITT KING
ARCHITECTS

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2. SITE ANALYSIS
3. ZONING MAPS
4. PREVIOUS PLANNING PERMISSION (REF: 071311)
5. PROPOSED HIGH DENSITY OPTION
6. PROPOSED LOW DENSITY OPTION
7. CONCLUSION



1. INTRODUCTION

G263 -- GEM Construction - Oriel Road, Collon

Development Strategy
Collon, County Louth





INTRODUCTION

This development strategy brochure has been prepared on behalf of Gem Construction in respect to their landholding at Oriel Road, Collon, Co. Louth.

This brochure has been prepared to accompany a submission by John Spain Associates on the Draft Louth County Development Plan 2021-2027, and seeks to illustrate the suitability of the lands for residential zoning having regard to the following:

- The edge of centre site location within the village of Collon
- The previous zoning of the site for residential development under the 2002-2008 Collon Local Area Plan
- The potential to consolidate the settlement of Collon through either a medium density option of between 20-30 units per hectare, or alternatively providing for a lower density development of c. 10 units per hectare which provides an alternative to urban generated housing in the Countryside

2. SITE ANALYSIS

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Development Strategy
Collon, County Louth



Aerial View - Google Maps - Map Data 2020

Site Area: 2.097 Hectares (5.178 acres)
Site shown in red

Concept Design Strategy

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Development Strategy
Collon, County Louth





Travel Radius

- 10 Minute Cycle Radius of 2.6KM
- 20 Minute Walk Radius of 2km
- 15 Minute Walk Radius of 1.5km
- 10 Minute Walk Radius of 1km
- 5 Minute Walk Radius of .5km

Site Location

Site Location with Amenities shown including Key Landmark / Neighbourhood Centres / Shops etc.

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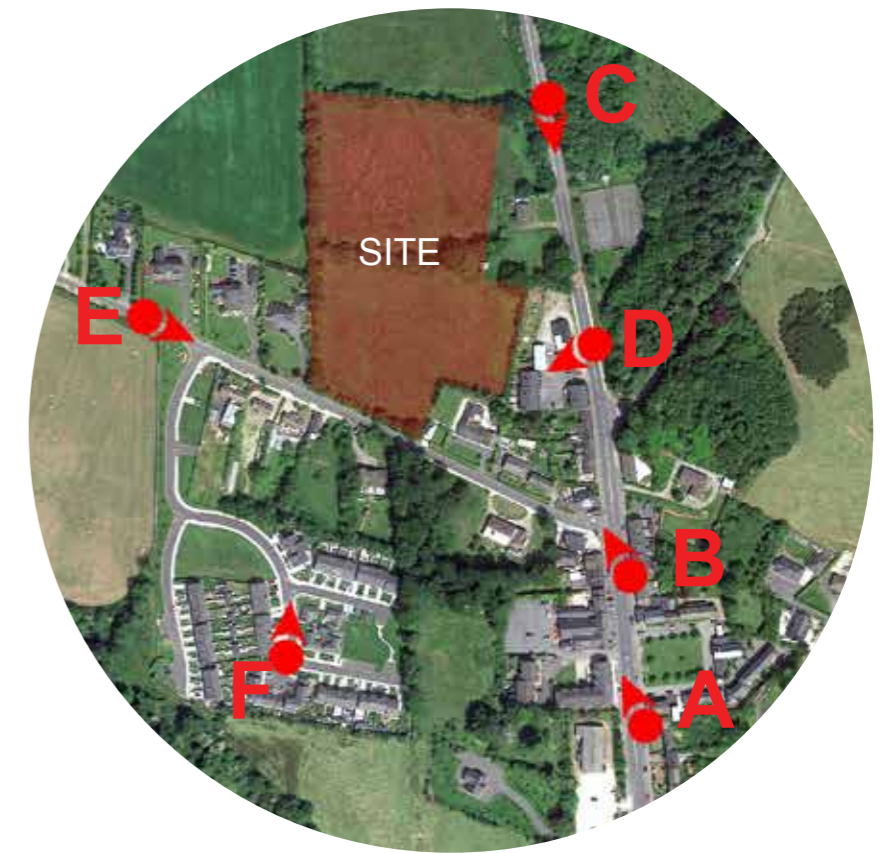




A - View towards site from Village Centre



B - View towards site from junction



Viewpoint Map

Site Context Photos

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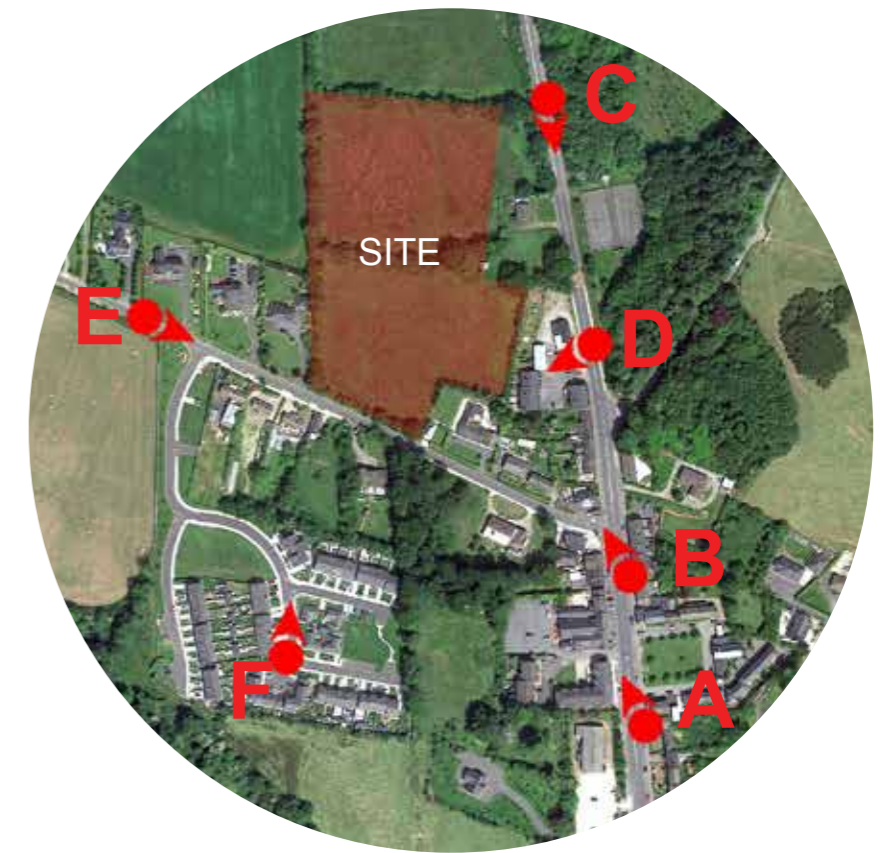
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C - View towards village from Ardee Road



D - View towards Site from Ardee Road



Viewpoint Map

Site Context Photos

G263 -- GEM Construction - Oriel Road, Collon

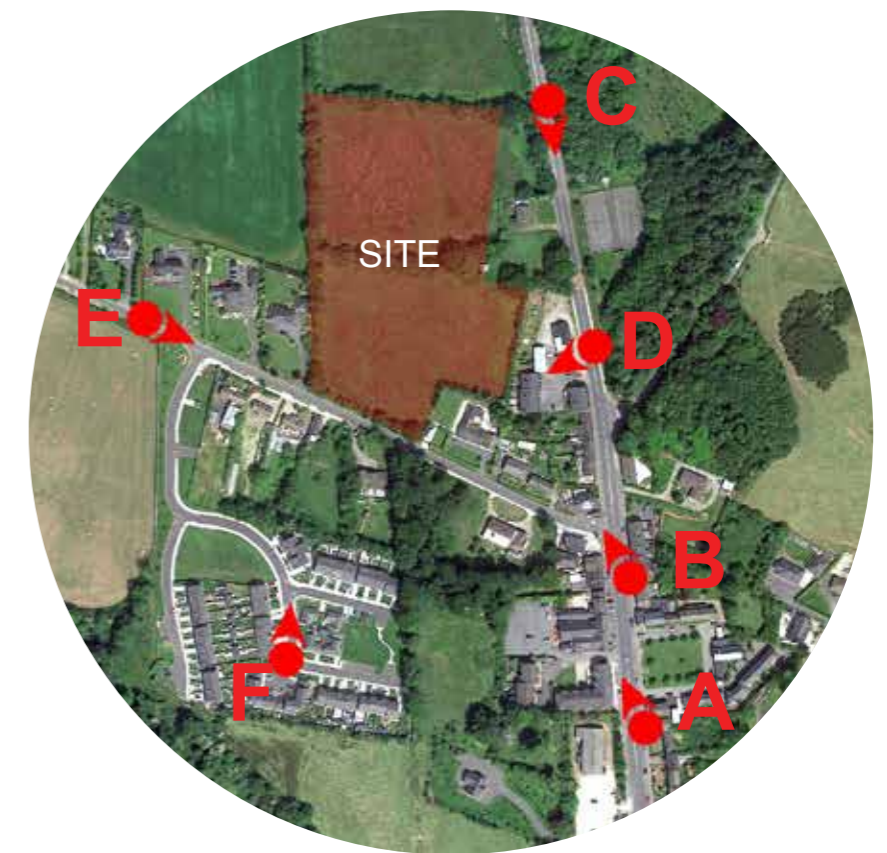
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E - View towards village from Oriel Road



F - View towards Site from Doire Beag



Viewpoint Map

Site Context Photos

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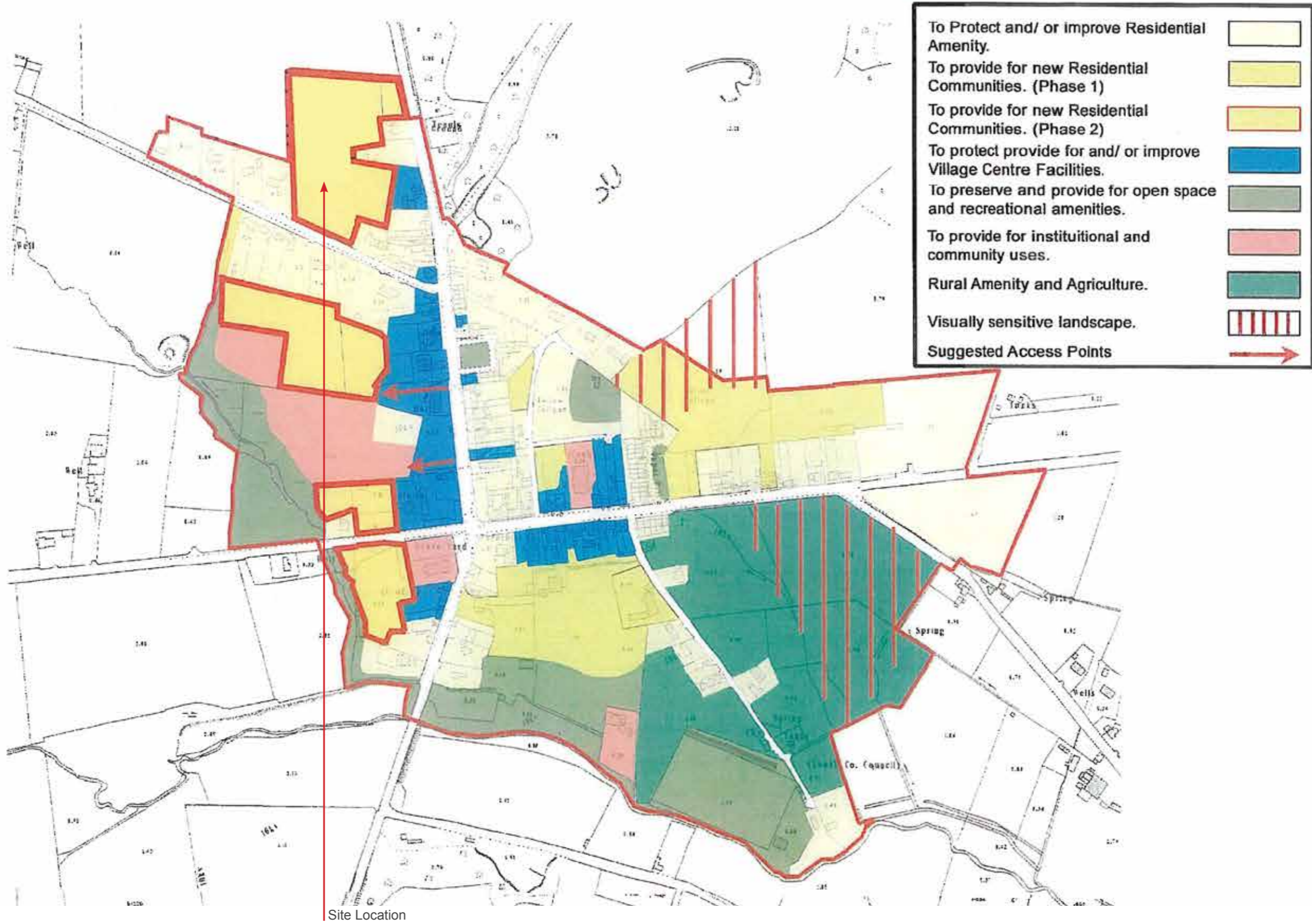
3. ZONING MAPS

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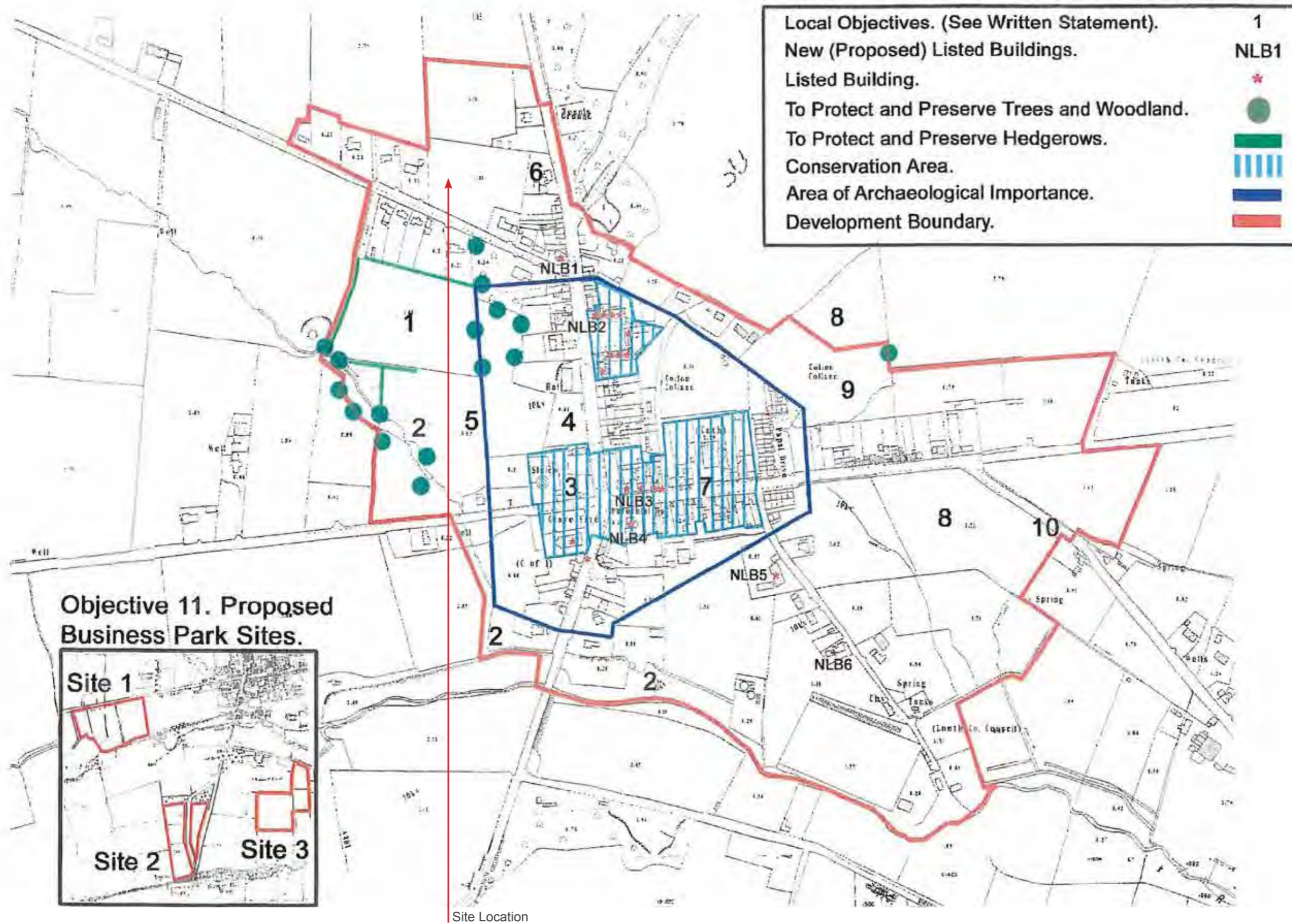
Development Strategy
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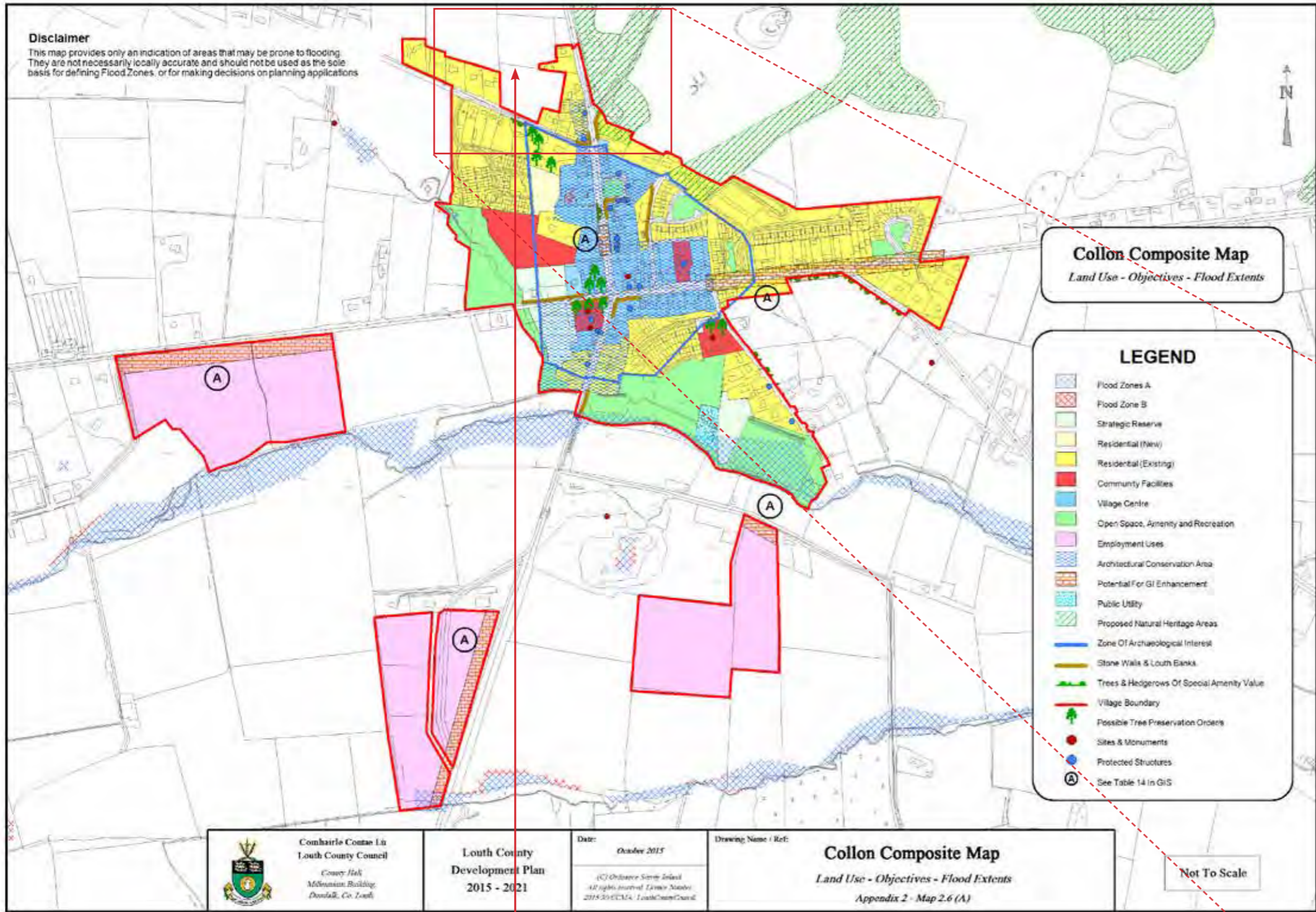


Collon Local Area Plan. Map 1. Zoning

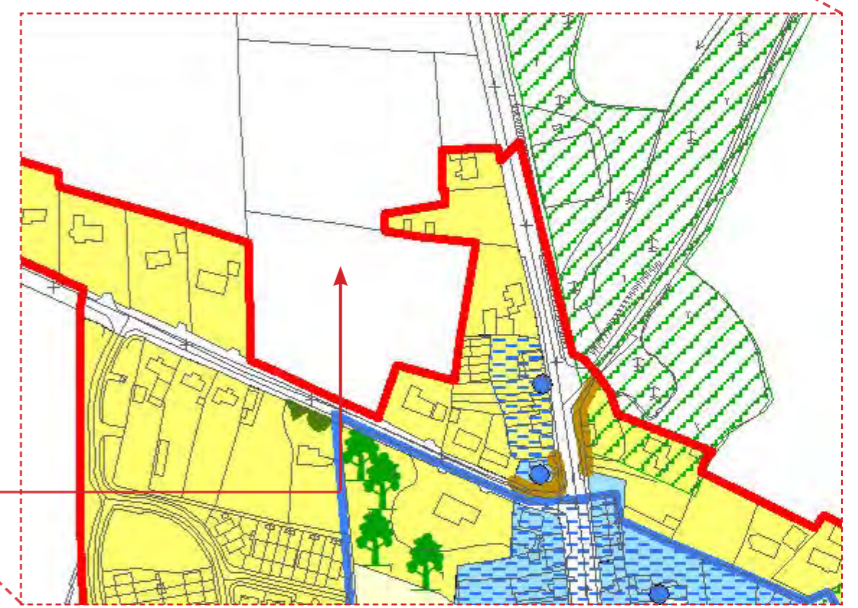


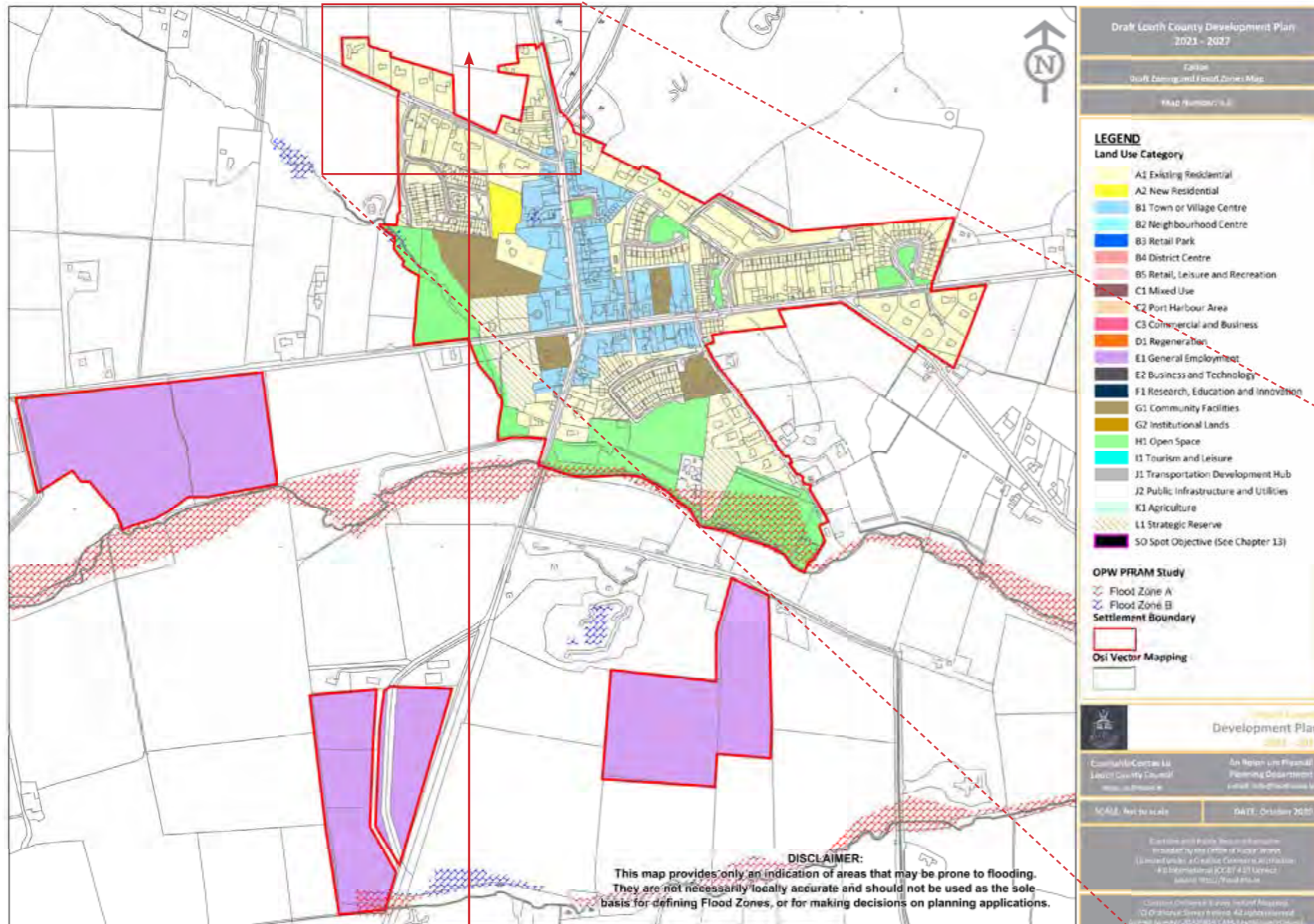
Collon Local Area Plan. Objectives. Map 2.





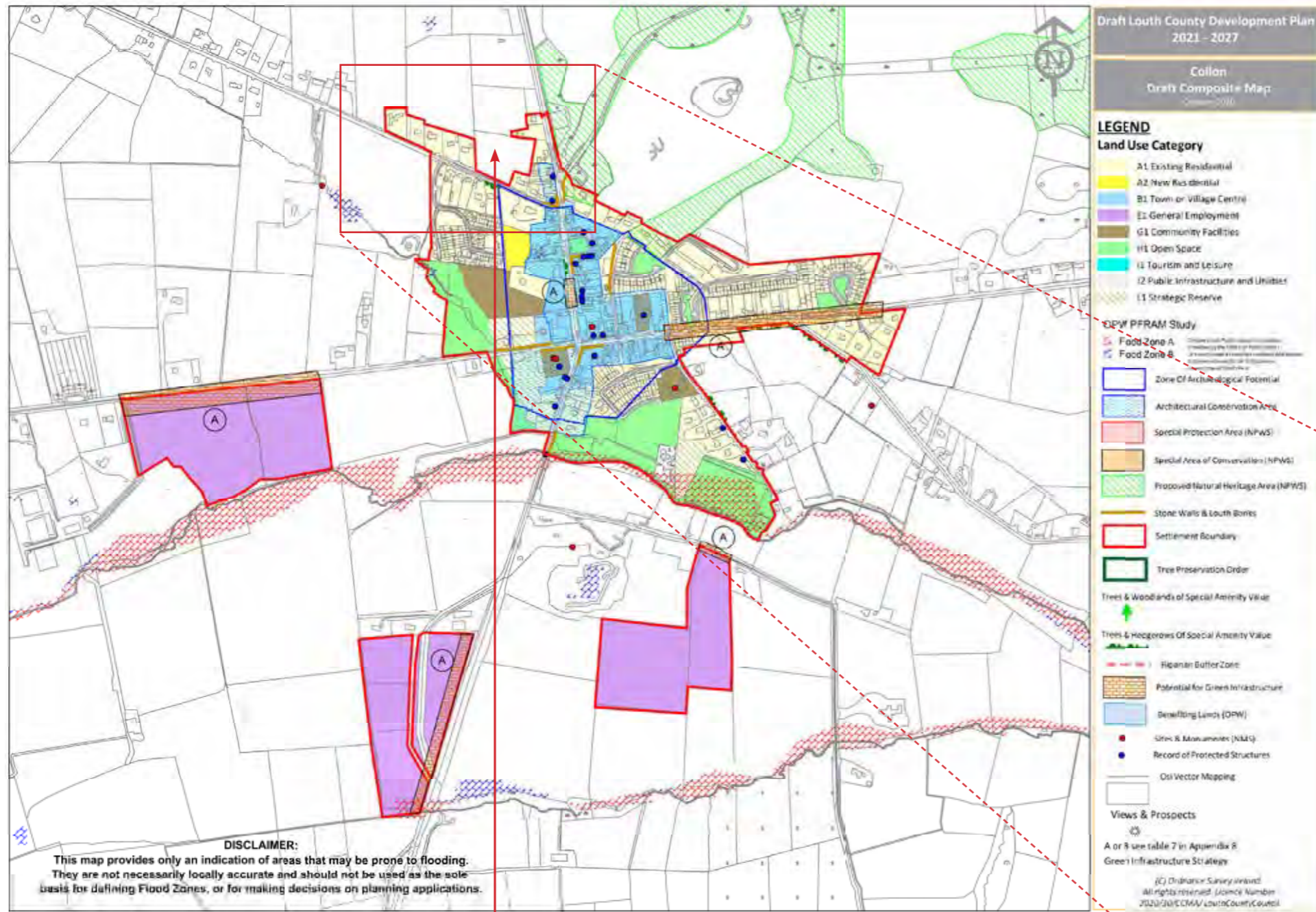
Site Location



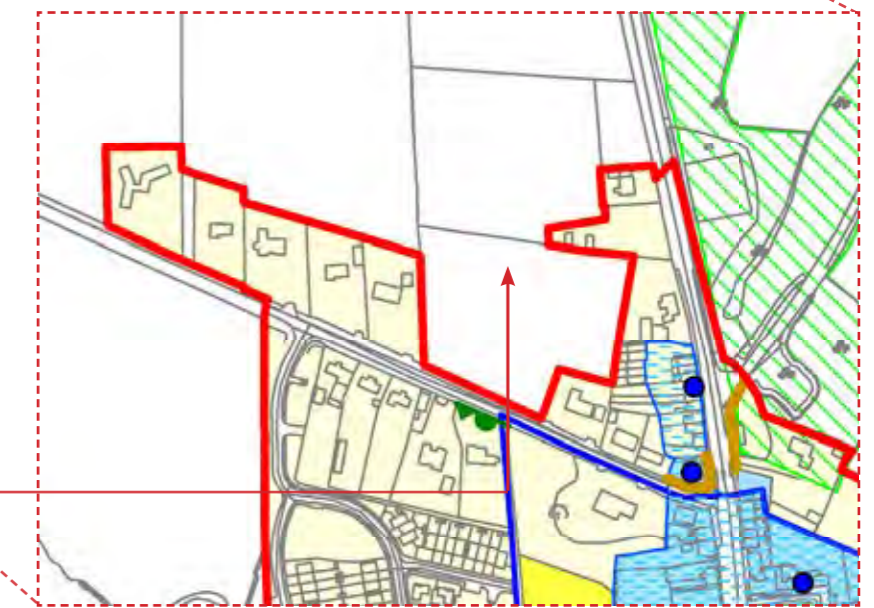


Site Location





Site Location



4. PREVIOUS PLANNING PERMISSION

(PLANNING REF: 071311)

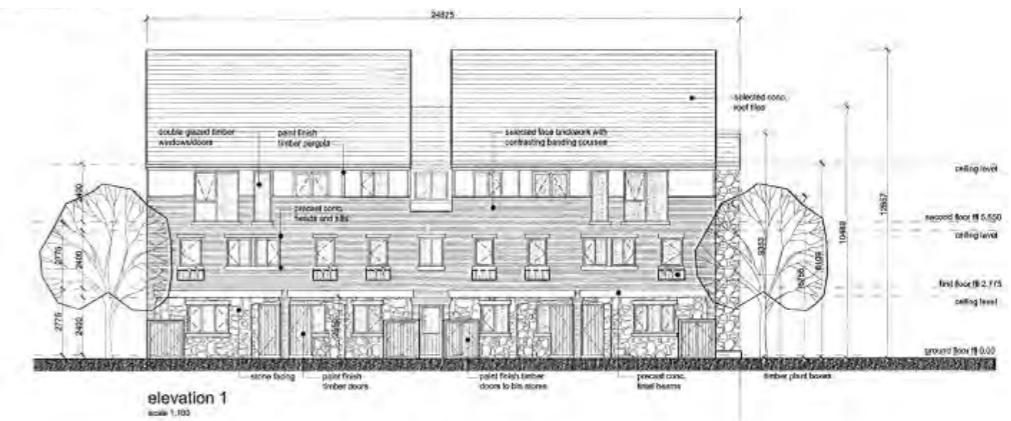
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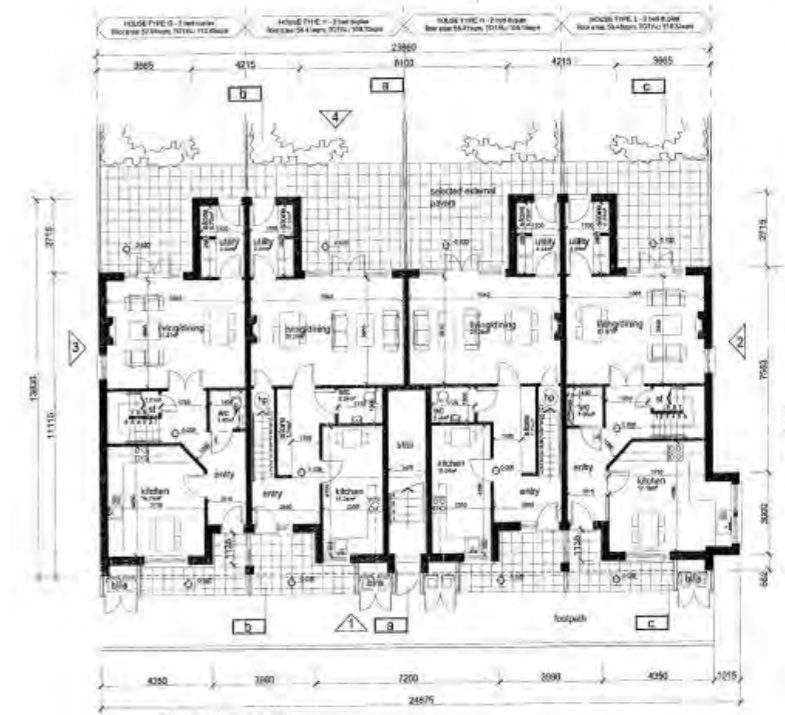




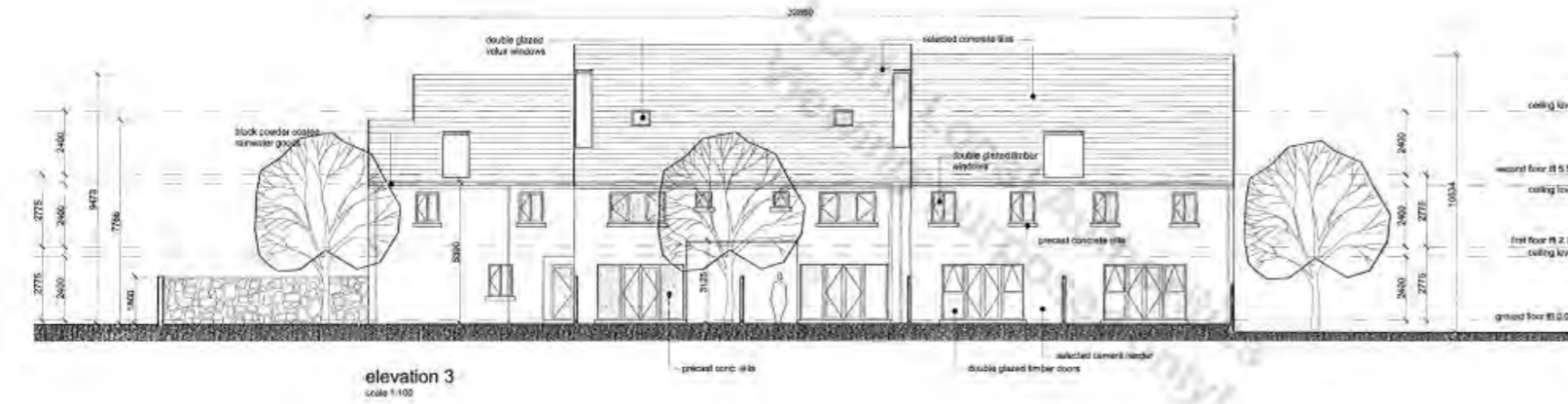
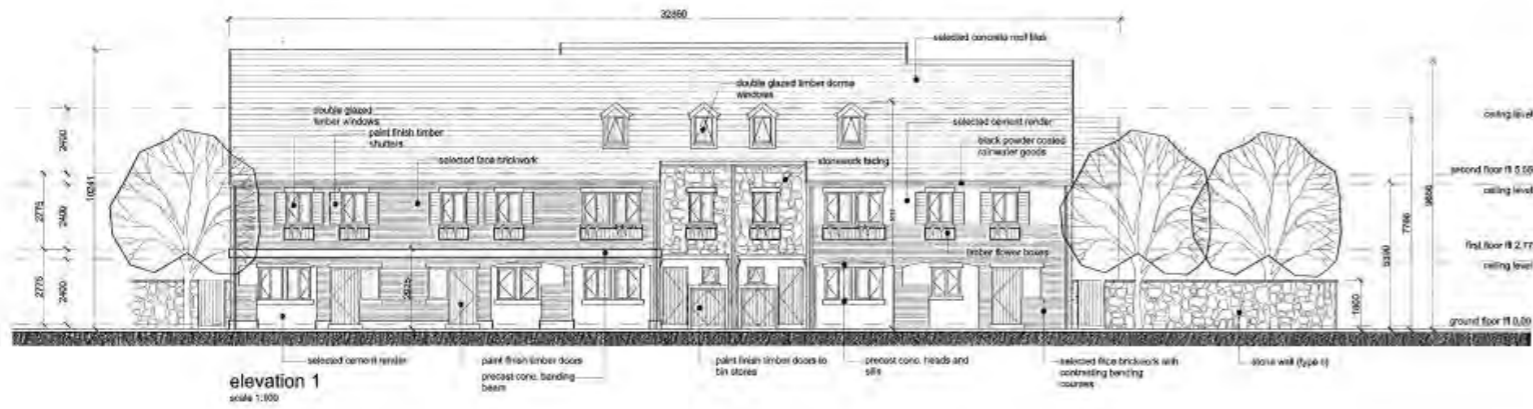
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by OBK Architects



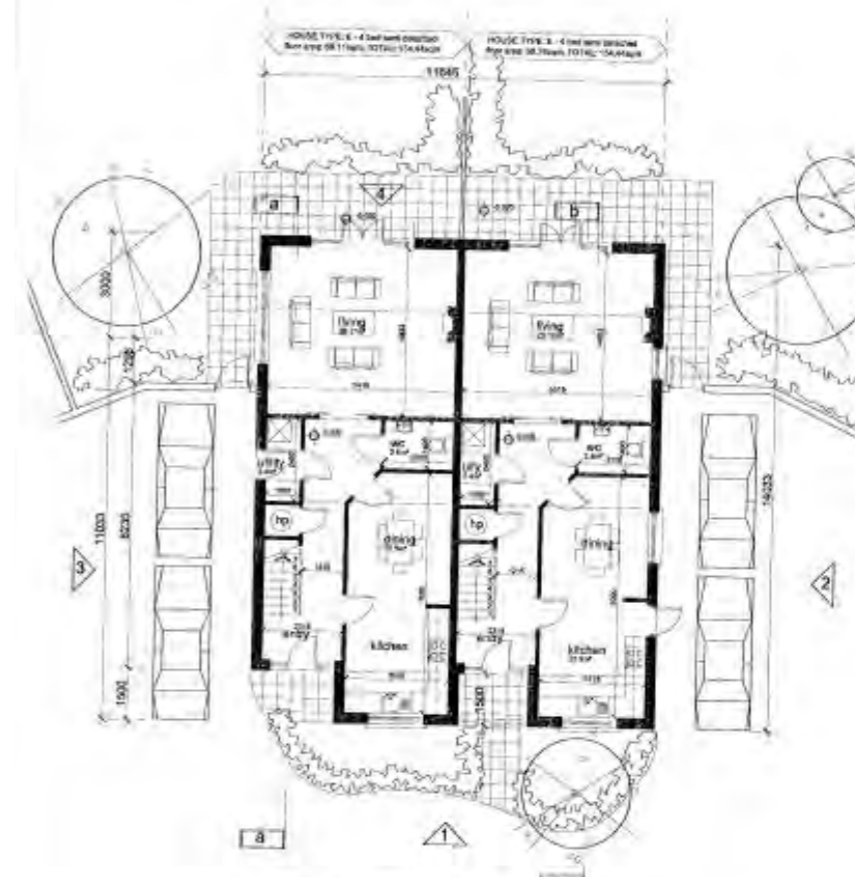
Previously Granted Duplex Elevation (Ref: 071311)
by OBK Architects



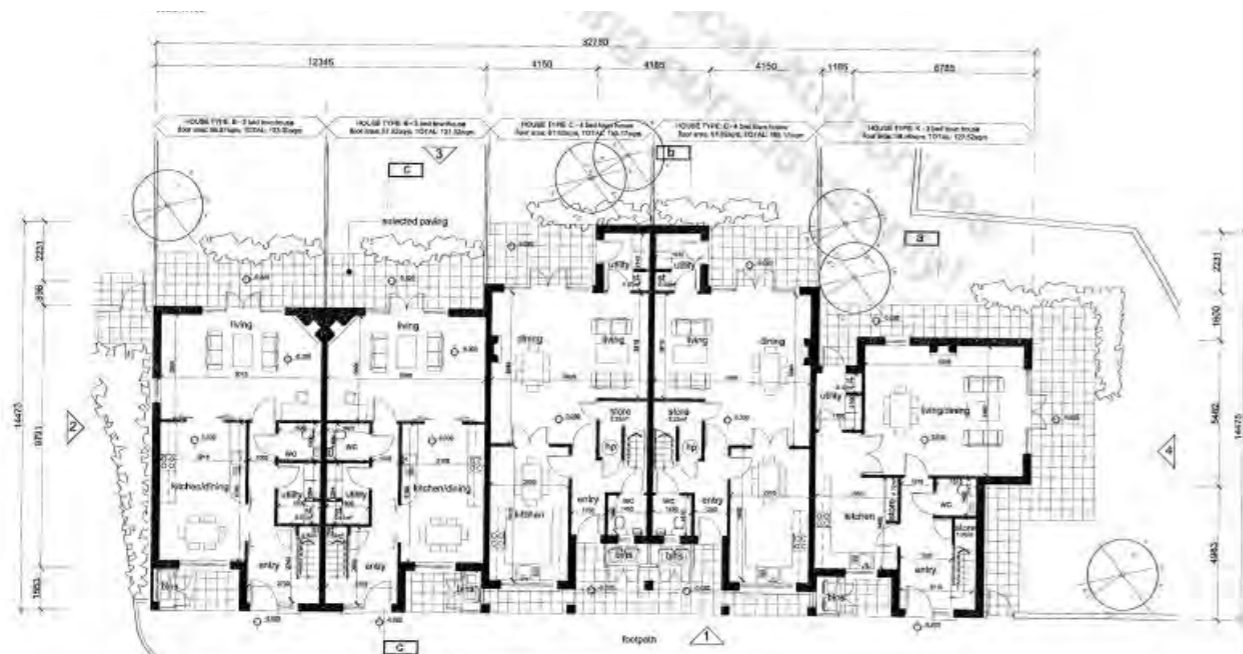
Previously Granted Duplex Floorplan (Ref: 071311)
by OBK Architects



Previously Granted Terrace Block Elevations (Ref: 071311) by OBK Architects



Previously Granted Typical Semi Detached House Type Plan (Ref: 071311) by OBK Architects



Previously Granted Terrace Block Plan (Ref: 071311) by OBK Architects



Previously Granted Typical Semi Detached House Type Elevation (Ref: 071311) by OBK Architects

5. MEDIUM DENSITY VILLAGE SETTLEMENT OPTION

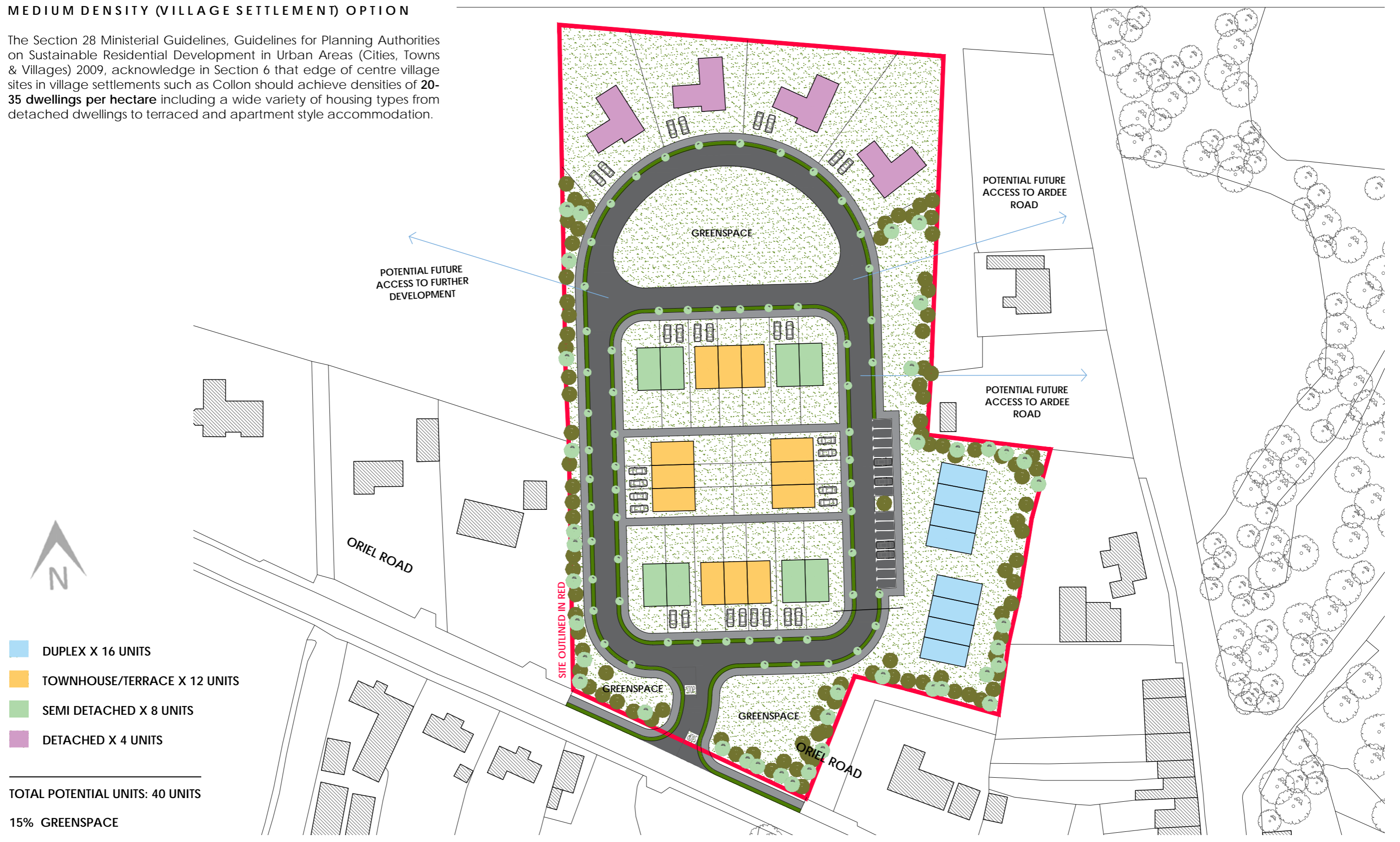
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Development Strategy
Collon, County Louth



MEDIUM DENSITY (VILLAGE SETTLEMENT) OPTION

The Section 28 Ministerial Guidelines, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) 2009, acknowledge in Section 6 that edge of centre village sites in village settlements such as Collon should achieve densities of **20-35 dwellings per hectare** including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation.



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Development Strategy
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REFERENCE PROJECT 1



Reference Project 1 - Parknasilloge, Enniskerry, Co. Wicklow

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Collon, County Louth



REFERENCE PROJECT 2



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6. LOW DENSITY URBAN GENERATED HOUSING OPTION

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Collon, County Louth



LOW DENSITY (URBAN GENERATED HOUSING) OPTION

Section 6 of the Guidelines also acknowledge that villages such as Collon can proactively cater for urban generated housing, specifically stating the following:

“(d) Offering alternatives to urban generated housing

In some limited circumstances, notably where pressure for development of single homes in rural areas is high, proposals for lower densities of development may be considered acceptable at locations on serviced land within the environs of the town or village in order to offer people, who would otherwise seek to develop a house in an unserviced rural area, the option to develop in a small town or village where services are available and within walking and cycling distance.”

The low density option illustrates the opportunity that the subject site offers to provide for lower density housing within the centre of the village settlement and on serviced land.



TOTAL POTENTIAL UNITS: 15 UNITS

Site Layout Plan

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Development Strategy
Collon, County Louth

REFERENCE PROJECT 3



Reference Projects 3 - Baile An Fheir, Kilcloon, Co. Meath (Coming 2021) -- Planning Reference no. - RA/190810

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REFERENCE PROJECT 4



Reference Projects 4 - Kilmeena Village, Co. Mayo

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7. CONCLUSION

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3D Illustration

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CONCLUSION

This development strategy brochure has demonstrated the suitability of this edge of centre site in Collon to cater for residential density subject to an appropriate land use zoning being incorporated in the new County Development Plan.

The submission has illustrated that the site could accommodate a typical medium density residential scheme which would be consistent with the residential land use zoning incorporated elsewhere in Collon. As an alternative, the submission has also illustrated how the site could be specifically zoned for low density residential development thereby proactively offering an alternative to urban generated housing within the centre of the village settlement of Collon and on a serviced site, and according with the recommendations of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) 2009.