

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

21st. 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 MR. JOHN MULHOLLAND,**

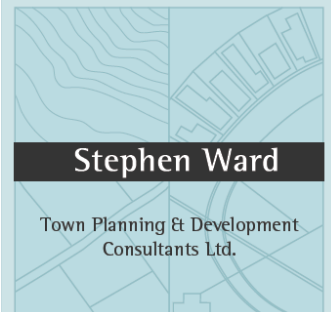
Mr. John Mulholland has retained Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House, Jocelyn Street, Dundalk, County Louth to make this submission relating to proposed zoning of lands at Kells Road, Collon, County Louth for E1 – General Employment in the Draft County Development Plan.

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 Mr. Mulholland are attached.

Yours Faithfully,

Stephen Ward



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1.0 INTRODUCTION

1.1 This submission seeks the following –

Removal of E1 Employment Zoning from lands identified as “Subject Site” and edged red on the site location map below and the Zoning of the Lands as Rural Policy Zone 1 in the Development Plan.

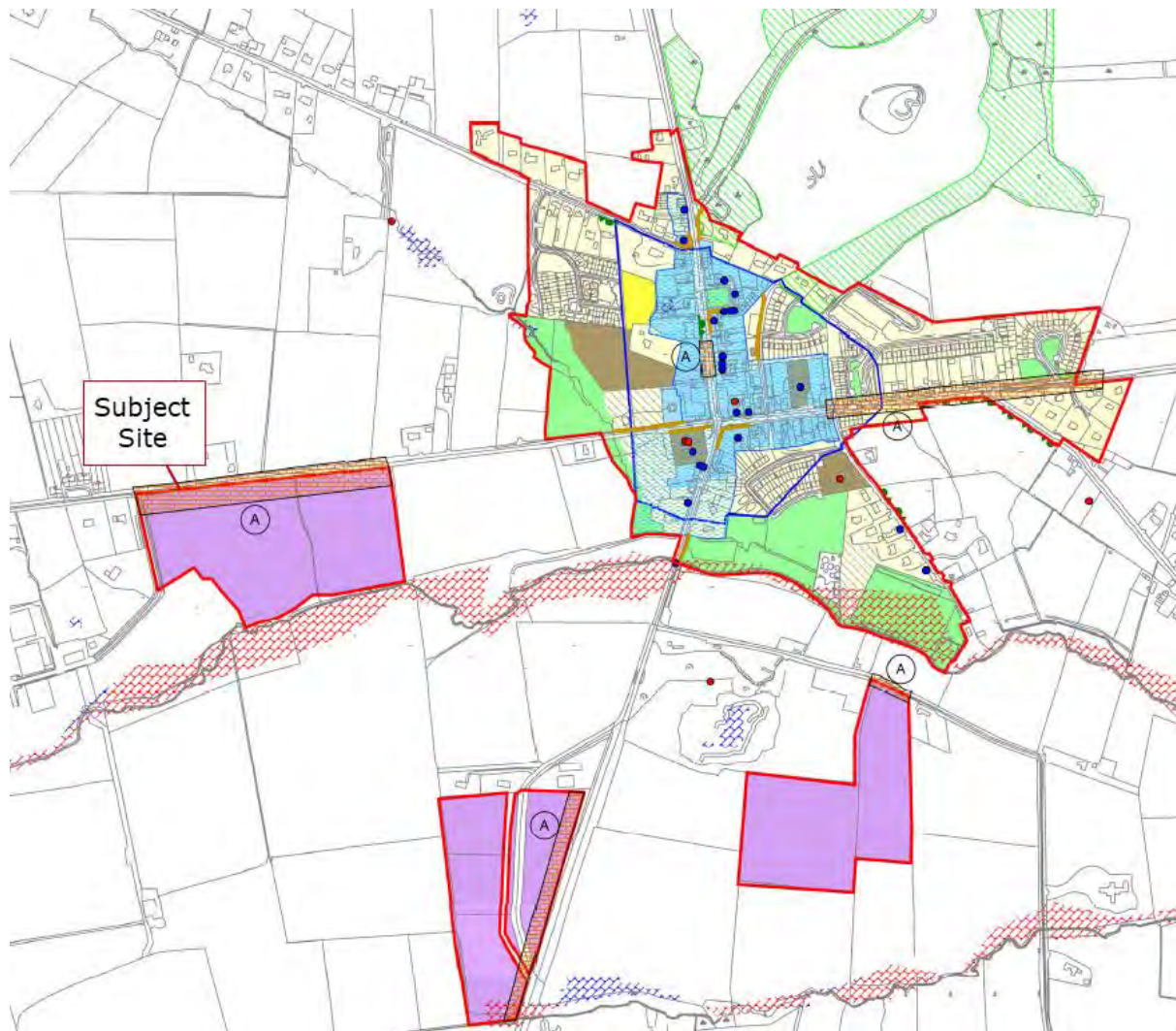


Figure 1 - Site Location

1.2 It is strongly submitted that the zoning of these lands for employment uses is utterly and completely in conflict with any reasonable and objective current planning policy assessment and such zoning cannot possibly be justified by reference to current national, regional or local planning policy considerations. It may be the case that such zoning might have been defensible in the past but this is no longer the case. It is submitted that no objective rational planning analysis based on current planning principles could possibly conclude that these lands are suited to E1 Employment zoning in the Draft Collon Village Plan as contained in the Draft Louth County Plan 2021 – 2027.

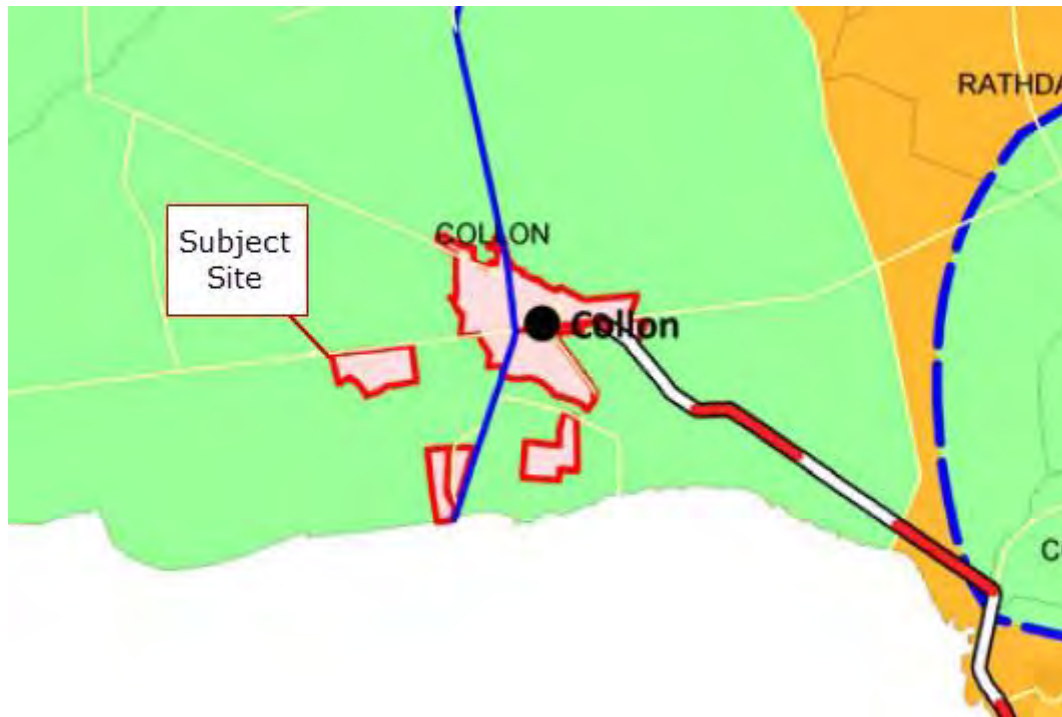


Figure 2 - Site Location

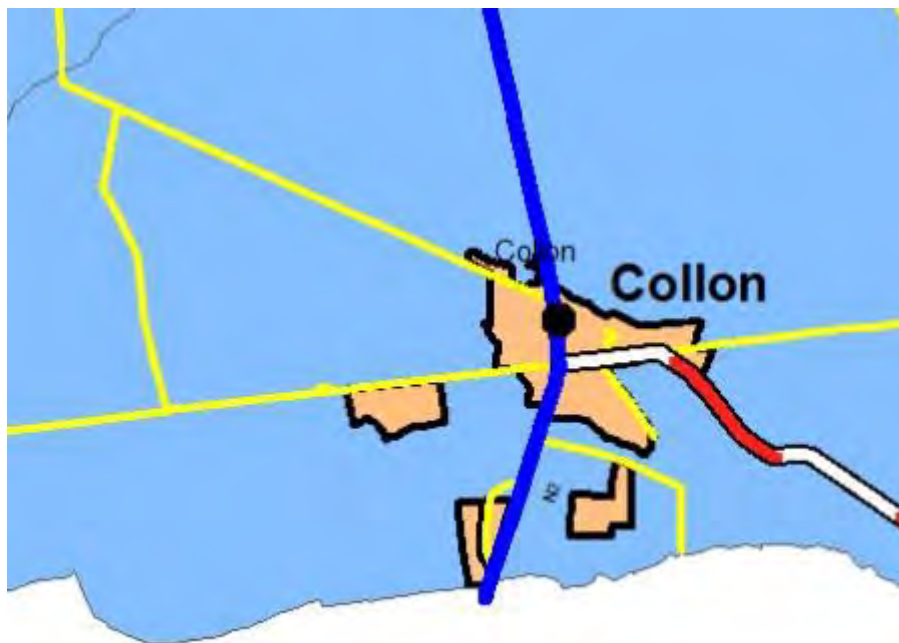
1.3 This is the case for the following reasons –

- The lands are unrelated to the settlement of Collon. There are no footpaths, public lighting or public transport connections to the village. Development on the lands would endanger public safety by reason of traffic hazard as there are no footpaths or public lighting between the site and the village.
- The lands are physically and visually separate from any reasonable assessment of the settlement boundaries of Collon.
- It is evident from the Land Use Assessment for Collon at Appendix 2 to the Draft Plan that the site scored extremely badly and this of itself is justification for the removal of the zoning and rezoning as Land Use Rural Policy Zone 1 in the Draft Plan. The site is Site 7 in the Tiered Assessment for Collon below. It is submitted that the very low (good score) of 2 for proximity to the Town Centre cannot be justified and that the overall score for the site should have been even higher (worse).

Settlement - Collon							
Tiered Assessment Analysis							
Land Use	RES	SR	SR	SR	EMP	EMP	EMP
Infrastructure Type	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7
Roads	●	●	●	●	●	●	●
Footpath	●	●	●	●	●	●	●
Public Lighting	●	●	●	●	●	●	●
Water	●	●	●	●	●	●	●
Wastewater	●	●	●	●	●	●	●
Tier 1 or Tier 2	●	●	●	●	●	●	●
Land Use Evaluation							
Proximity to Town Centre	1	1	1	1	2	2	2
Contribute to Consolidated/compact growth	1	3	3	4	5	5	5
Proximity to shops and services	1	1	1	2	5	5	5
Proximity to schools	3	3	3	1	N/A	N/A	N/A
Infill/Backland	1	3	3	1	5	5	5
Availability to public transport	3	1	1	3	3	4	3
Flooding	1	1	1	1	1	3	1
Total	11	13	13	13	21	24	21

- It is evident from the Rural Policy Zone Map that the lands are completely unrelated to the settlement and that the clear and obvious zoning that should apply is Rural Policy Zone 1.
- The reality is that the submission lands are located in an unserved rural area.
- Given the extent of the site it is impossible to imagine a scenario where it is utilised for local employment purposes.
- The zoned area extends to c8 hectares and this could easily accommodate buildings with an overall footprint of well over 10,000sq.m (100,000sq.ft). Regional planning policy would not promote employment development at this scale in an unserved rural area. Such levels of employment zoning would be far more appropriate to a regional growth centre such as Drogheda or Dundalk.

- The zoning of that extent of lands is in conflict with the policies of the existing Collon Village Plan. For example Policy EMP 1 states – *“To promote and facilitate the provision of local sustainable employment opportunities”*. OBJ 1 states – *“Protect and support Level 3 settlements as local service centres in rural areas and facilitate limited development that is commensurate with the nature and extent of the existing settlement and the availability of public services and facilities”*. *“OBJ 5 – To ensure that there is sufficient land zoned to meet the housing, employment, community facilities and amenity needs of the village and that such development is carries out in an orderly, consistent and sustainable fashion in accordance with the principles of proper planning and sustainable development”*. (Underline added).
- The existing village Plan contained within the County Plan (Chapter 7 Appendix 2) states as follows – *“The village is set in a natural scenic landscape which is designated as Area of High Scenic Quality (AHSQ). Along the approach roads to the village there is however a proliferation of ribbon development comprising one-off type housing. This weakens the urban form of the village”*.
- The submission lands are surrounded by Development Control Zone 2 in the existing County Plan. Zone 2 is described as – *“The area covered by this development zone contains landscapes of high scenic quality which the Council considers should be protected”*. It is noteworthy that the development policies for Zone 2 as contained in the Development Plan are very restrictive. Under Policy RD34 large scale intensive industrial development are not considered appropriate within this zone.



- It is submitted the lands display all the characteristics and sensitivities of Development Control Zone 2 and none of the characteristics of an urban development site or a sensible expansion of the village. It is not possible to simply carve out a piece of land and draw a line around it and then say because of that arbitrary line that particular piece of land is not sensitive when everything else around it remains sensitive. The characteristics of the application site have all the characteristics of the surrounding AHSQ Zone 2 lands and as such, if they are to be developed they need to be developed in an extremely sensitive manner.
- The sensitive landscape designation is carried through to the new Draft Plan.
- The lands are heavily constrained from the point of view of landscape and environmental considerations located in the Mattock Valley with fields rolling down to the edge of the river and contributing strongly to the landscape setting and character of the river valley. The village itself contains a high level of protected structures and the approach to the village along this road is also an important contributor to the village environment.
- It is submitted the proposed zoning conflicts materially with the settlement hierarchy and policies and objective for the village in the new Draft Plan. The overarching policy is that the village is a Tier 4 settlement where the goal is to facilitate only local services and local employment. The following are examples of such policy conflict –

“COL4 – To ensure the village centre is the priority location for new commercial, retail and mixed use developments thereby creating opportunities to live, work and shop within the village and reduce the need to travel by private car”.

“COL5 – To encourage the return of vacant buildings in the village centre to uses which complement the existing scale and character of the settlement”

“COL19 – To protect and enhance the unique characteristics and setting of Collon including its Area of High Scenic Quality, zone of Archaeological Potential, archaeological features, Architectural Conservation Area and built and natural heritage elements”.

- It is noted that the village zoning maps designate the road frontage of the lands as affected by a “Green Infrastructure Designation” and clearly, the development of the lands for employment purposes would undermine the achievement of this objective.

2.0 CONCLUSIONS

It is strongly contended that the proposal to zone the submission lands for employment uses does not conform to any current national, regional or local planning policy objectives and indeed would conflict with many of the policies of the existing and proposed County and Collon village plans. The lands are clearly in a very sensitive landscape setting and there is no need or justification for zoning them for industrial development.

Yours sincerely,

Stephen Ward