



17th December 2020

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

Louth County Council
23 DEC 2020
Customer Services
Dundalk

Dear Sir or Madam

DEVELOPMENT PLAN REVIEW.

EHP Services has been appointed by Mr Pat Fallon to make the following submission in respect of the draft Louth County Development Plan 2021-2027 and lands under his ownership at Dromiskin, Dundalk, Co. Louth.

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

The Submitter owns land in the village of Dromiskin comprising of several fields amounting to 39 acres in area. The area of land subject of this submission is located in the southern periphery of this land block (see Map 1 overleaf).

Under the current and draft County Development Plans the majority of the landholding lies outside the settlement boundary for the village (see Map 2 overleaf). An area of approximately 2.9 acres off Chapel Road to the south sits inside the proposed settlement boundary and zoned A2 - New Residential. An area of approximately 6.08 acres located in the north-eastern periphery of the landholding is proposed to be zoned L1 Strategic Reserve.

The Submitters requests that Composite Map and draft Dromiskin Planning and Flood Zones Map 4.4 be amended to include the subject site and for said lands to be rezoned A2 - New Residential and that Sites 1 to 3 identified herein are rezoned to L1 - Strategic Reserve.

As a consequence of the proposed changes to the zoning structure throughout the County the overall landholding and subject site are to be located with Rural Policy Zone 2 which the County Plan considers to be land under strong urban influence. Residential development within Rural Policy Zone 2 is consequently limited to rural one-off or 'local needs' applicants. Speculative development would be fundamentally contrary to this new zoning approach and would be directed towards existing urban settlements even in circumstances involving lands peripheral to the village boundary.

We are cognisant that Dromiskin is identified in the draft County Plan's as a Level 4 Small Town or Village and the function it will play in the County's Settlement Hierarchy.

The draft Plan recognises the considerable development undertaken within the village in past decades resulting in a linear pattern of development and elongated village form. This pattern of development or ribbon development is discouraged throughout all levels of national, regional and local guidelines as it weakens the cohesion of an urban settlement and its core. An objective of the draft County Plan is to focus on '*... consolidation and the build out of extant permissions, with opportunities for infill and brownfield development close to the village centre*'. Dromiskin's written statement identifies the village core as St. Peter's School, the Church of St. Peters, the Heritage Bar, the petrol filling station, Centra shop and Dromiskin Pharmacy. The Plan also noted the village would benefit from the provision of a footpath network thereby improving connectivity, road safety and reducing reliance on the private car

The Submitter's request to revise the proposed settlement boundary and rezone the subject site is based upon an analysis of the planning history of three identified sites within the village. Map 3 overleaf and the following table summarises the planning history of each site.

Site	Area (approx.)	Planning ref. no.	Description	Decision
1	1.81 acres	n/a	n/a	n/a
2	2.86 acres	10303	Permission for 33no. dwellings, public open space, infrastructure connections, landscaping & boundary treatment, vehicular and pedestrian access and associated site works.	Approved 11.01.11
		15853	Extension of Duration of ref. 10303.	Refused 31.06.16
3	2.95 acres	n/a	n/a	n/a

Sites 1 and 3 have been zoned and included in the village boundary in several of the County's previous Development Plans but has generated zero applications for development. With the refusal of the extension of duration application (rf. 15853) Site 2's only grant of planning lapsed in January 2016 without any further interest indicated in resubmitting. We note that a substantial portion of Site 1 is within Flood Zone B. The Department of Environment Heritage & Local Government's *The Planning System and Flood Risk Management Guidelines* (2009) advocates for the development of other lands in preference to and before lands which are vulnerable to flooding events. It would further highlight the unsuitability of Site 1 to remain the focus of potential future housing provision for the village.

The overall quantum of undeveloped lands equates to approximately 7.62 acres which, if rezoned to L1 Strategic reserve would more than adequately balance the parcel of land subject of this submission (see Map 1 overleaf).

A revised settlement boundary and rezoning of the subject site would facilitate development that promotes consolidated growth and strengthen the existing village fabric in keeping with the principles of the draft County Plans Core Strategy which '*... facilitates and promotes a more consolidated compact urban form and ensures that future growth is based on the principles of sustainable development ...*' and draft Policy Objectives CS 14, CS 15, CS 16 and SS 55 which state:

CS 14 To ensure localised sustainable growth within the small towns and villages identified in the Settlement Strategy, is proportionate to the size of the settlement, prioritised on infill/brownfield sites and that economic related development is supported.

CS 15 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.

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.

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.

We envisage the subject site providing a cluster of dwellings or individual development plots located within a more centrally located and accessible area than Sites 1 to 3. Any future development proposal would be laid out and designed to fully integrate with the parcel of ground within the landholding that is already inside the settlement boundary and zoned A2 - Existing Residential. The new rezoned lands would be within minutes walk from the church, school, shops and pub subsequently

reducing reliance on the private car in favour of alternative modes of transport i.e. walking and cycling. The subject site would be of a development density and layout commensurate with and complementary to the surrounding urban form. The development of the subject site closer to the village core would strengthen and rejuvenate the fabric of the village and contribute towards a more vibrant and sustainable rural community. In addition to serving the future housing needs of the local population this small area of land could help contribute towards delivering upon Policy CS 15 by facilitating housing opportunities for those who do not qualify for rural one-off housing but still wish to live rurally.

As the proposed amendments represent a reallocation of zoning not an increase in the overall quantum it will not materially or detrimentally effect the draft County Plan's Housing Strategy and will in fact result in a reduction in the number of potential new units serving Dromiskin.

In this regard we hope the County Council is favourably disposed to our submission and include the subject site within an amended settlement boundary, rezoned to A2 - New Residential and the subsequent change of zoning in Sites 1 to 3 to L1 - Strategic Reserve.

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

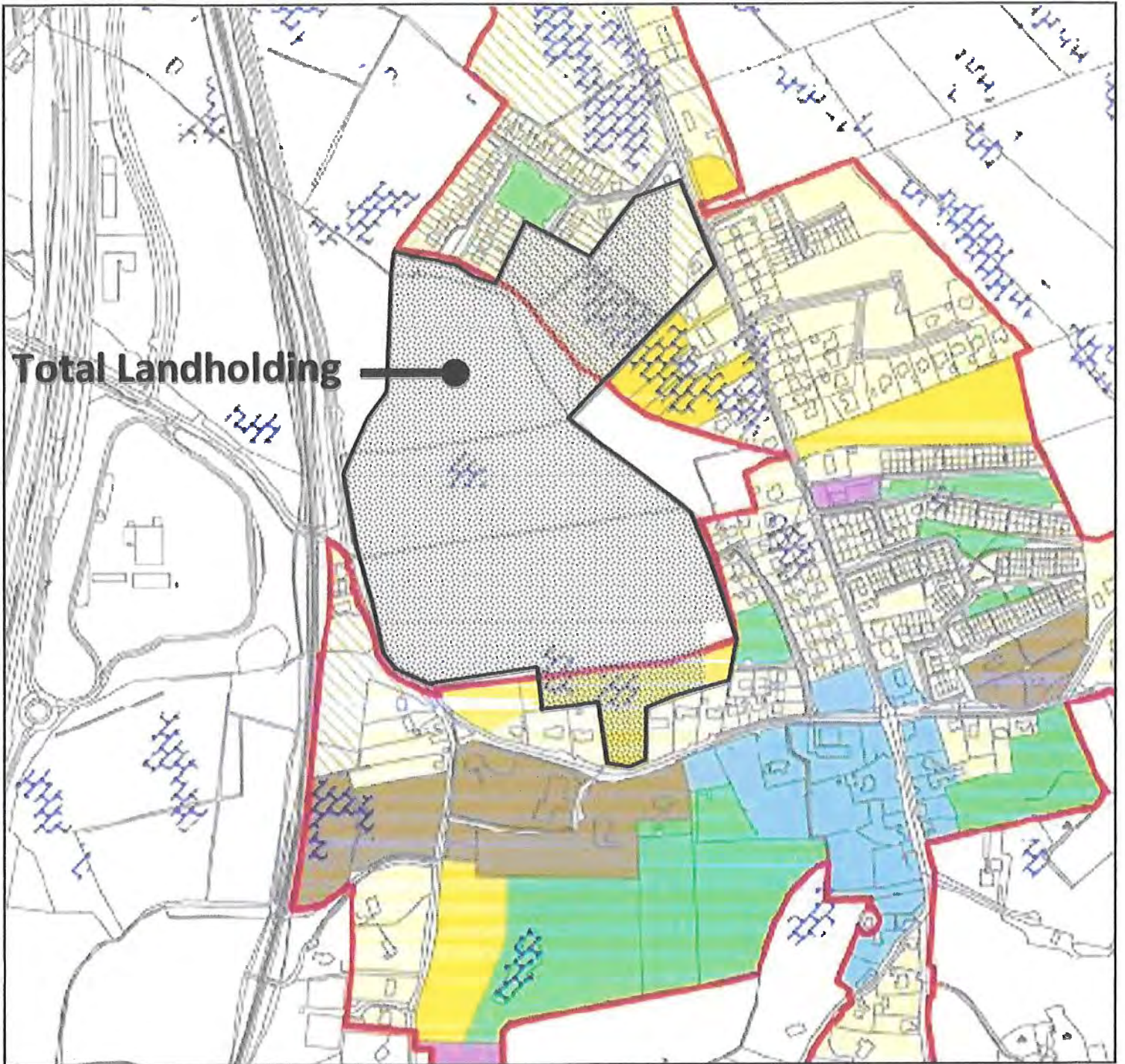
Regards

EHP Services



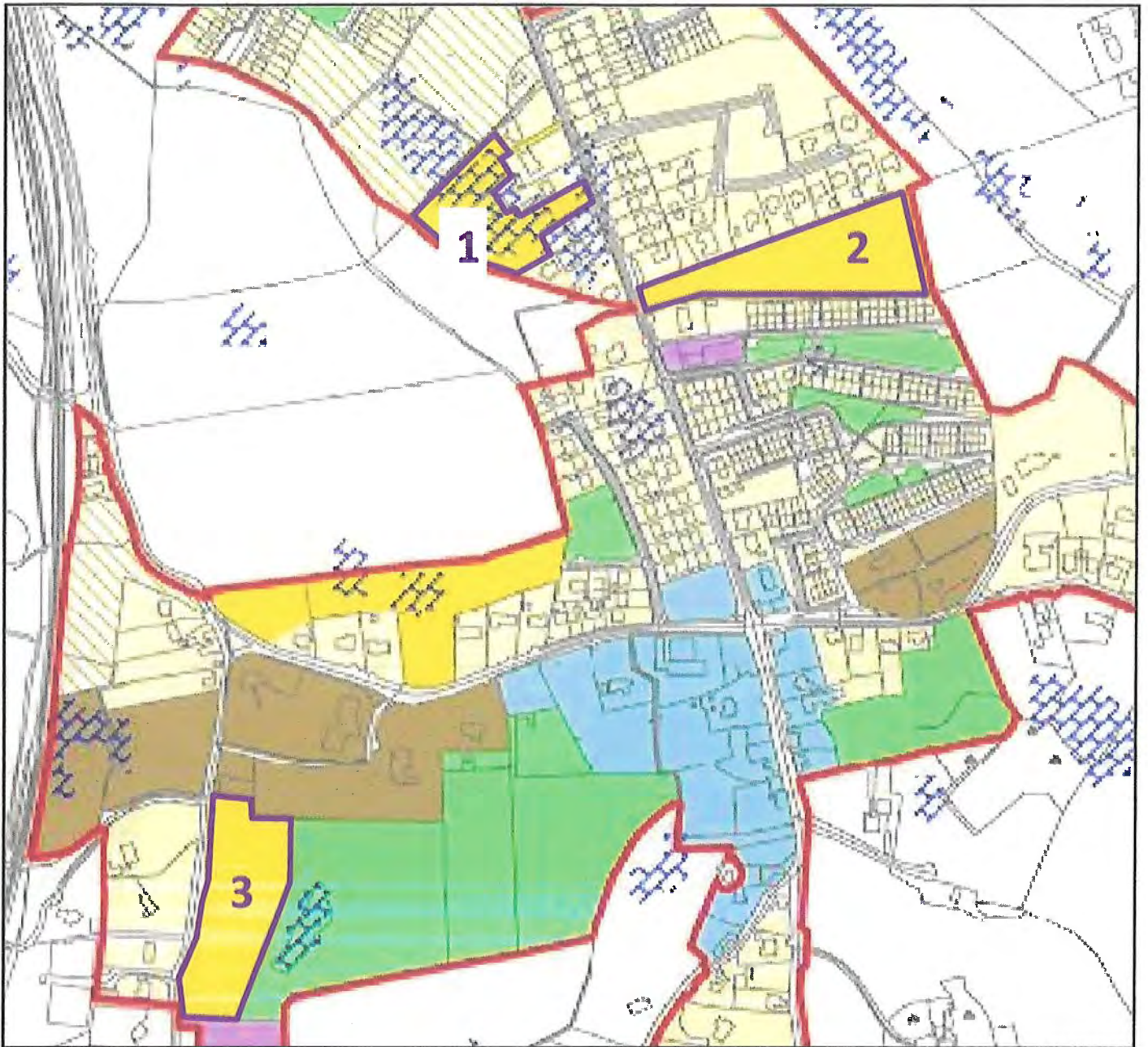
Map 1 - Site Location Map

Source: Goole Maps 2020



Map 2 – draft Planning & Food Zones Map 4.4

Source: draft Louth County Development Plan 2021-2027



Map 3 – Proposed A2 – New Residential Zoned Lands

Source: draft Louth County Development Plan 2021-2027