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

23rd December 2020

RE: Draft Louth County Development Plan 2021-2027

Rezoning of lands at Beaulieu Village, Termonfeckin Road, Newtownstalaban, Drogheda, Co. Louth from 'H1 – Open Space' to 'A2 – New Residential'.

Client: J. Murphy Group

Dear Sir/Madam,

Downey Planning, Chartered Town Planners, 1 Westland Square, Pearse Street, Dublin 2, on behalf of our client, J Murphy Group, Co. Louth, wish to make a submission to Louth County Council regarding the Draft Louth County Development Plan 2021-2027. Please address all correspondence on this submission to Downey Planning.

Our client is seeking to have 1.8 hectares of their lands at Beaulieu Village, Termonfeckin Road, Newtownstalaban, Drogheda, Co. Louth, rezoned from 'H1 – Open Space' to 'A2 – New Residential' in the new Louth County Development Plan 2021-2027. Please find enclosed a submission report which outlines the justification and planning rationale for this proposed rezoning.

We would respectfully request that you would favourably consider the contents of this submission on behalf of our client. If you have any queries or require any further copies, please do not hesitate to contact us.

Yours sincerely,

Donal Duffy MIPI

Director

For and on behalf of Downey Planning

December 2020

Development Plan Submission



Draft Louth County Development Plan 2021-2027 (Stage 2)

Lands at Beaulieu Village, Termonfeckin Road, Newtownstalaban, Drogheda, Co. Louth

On behalf of: J. Murphy Group



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Executive Summary

- This submission is made by Downey Planning, on behalf of our client J. Murphy Group, and is submitted to Louth County Council in the context of the Draft Louth County Development Plan 2021-2027, which is currently on public display.
- Our client owns approximately 23 hectares of lands at Beaulieu Village, Termonfeckin Road, Newtownstalaban, Drogheda, Co. Louth. It is noted that the first phases of Beaulieu Village have been constructed and further construction is ongoing. It is our client's intention to develop out the remainder of the land holding in accordance with the Vision of the North Drogheda Environs Plan 2006. However, under the currently proposed Draft Louth County Development Plan, approximately 1.8 hectares of lands are to be 'dezoned' to 'H1-Open Space'.
- Our client is seeking to have these 1.8 hectares of land zoned as 'A2 – New Residential', in keeping with the Vision of the North Drogheda Environs Plan 2006 and with the ongoing residential development taking place at Beaulieu Village by J. Murphy Developments, including an extant permission on the subject lands (Reg. Ref. 18/939), which is due to commence construction in January 2021.
- It is noted that as the permitted development granted under Reg. Ref. 18/939 is due to commence in January 2021, it is illogical and without merit to propose that these lands should be dezoned as a 'H1-Open Space' as it would not be in keeping with the permitted development.
- The zoning of the subject lands as 'A2 – New Residential' is in accordance with the policies and objectives of the Draft Louth County Development Plan, as well as national and regional planning policy.

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1.0 Introduction

In accordance with Sections 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended), Downey Planning, Chartered Town Planners, 1 Westland Square, Pearse Street, Dublin 2, on behalf of our client, J Murphy Group, wish to make this submission to Louth County Council regarding the Draft Louth County Development Plan 2021-2027.

This written submission is made in response to an invitation for comments from interested parties by Louth County Council. This submission is being made within the specified timeframe for submissions i.e. 23rd December 2020, as set out on the Draft Development Plan's website.

Our client owns approximately 23 hectares of lands at Beaulieu Village, Termonfeckin Road, Newtownstalaban, Drogheda, Co. Louth, part of which has been developed for residential use and part of which is currently under construction. It is our client's intention to develop out the remainder of the land holding in accordance with the Vision of the North Drogheda Environs Plan 2006.

However, under the currently proposed Draft Louth County Development Plan, approximately 1.8 hectares of lands are to be 'dezoned' to 'H1-Open Space'. Our client is seeking to have these 1.8 hectares of land zoned as 'A2 – New Residential', in keeping with the Vision of the North Drogheda Environs Plan 2006 and with the ongoing residential development taking place at Beaulieu Village by J. Murphy Developments. In fact, construction on the subject lands is due to commence in January 2021 for Phase 3 of Beaulieu Village development, which was granted under Reg. Ref. 18/939.

Our client is well established and respected house builder who has been delivering homes in the north east (Louth, Meath, Dublin) for over 25 years and is actively seeking to build houses on the subject lands, subject to appropriate zoning being attached to the lands.

2.0 Planning Legislation

Section 9 of the Planning and Development Act, 2000 (as amended) provides that, subject to the requirements set out in Section 9, 10, 11 and 12 of the Act, that a planning authority must adopt a new Development Plan every six years. The contents of the Development Plan are set out within Section 10 of the Planning and Development Act, 2000 (as amended) and must include a strategy for the proper planning and sustainable development of the area of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question. The process for the preparation of the Draft Development Plan is contained within Section 11 of the Planning and Development Act, 2000 (as amended) and the consultation process of the Draft Development Plan is contained within section 12 of the Planning and Development Act, 2000 (as amended), which states:

"12 - (1) Where the Draft Development Plan has been prepared in accordance with section 11, the planning authority shall within 2 weeks of the period referred to in section 11(5)(c)–

(a) send notice and a copy of the Draft Development Plan to the Minister, the Board, the relevant regional authority, the prescribed authorities, any town commissioners in the area and any city or county development boards in the area, and

(b) publish notice of the preparation of the draft in one or more newspapers circulating in its area.

(2) A notice under subsection (1) shall state that—

(a) a copy of the draft may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly), and

(b) written submissions or observations with respect to the draft made to the planning authority within the stated period will be taken into consideration before the making of the plan”.

This submission to the draft of the Development Plan is being made in accordance with Section 12(2)(b) of the Planning and Development Act, 2000 (as amended) and is being submitted within the specified timeframe (23rd December 2020) as set out on the website of the Draft Louth County Development Plan 2021-2027.

3.0 Site Location and Description

The subject lands are located in at Beaulieu Village, Termonfeckin Road, Newtownstalaban, Drogheda, which is within the functional area of Louth County Council. The lands, subject to this rezoning submission, extend to approximately 1.8 hectares and are situated to the north eastern side of the town of Drogheda. The site comprises agricultural lands but are located between the residential developments of Aston Village and Beaulieu Village (the construction of which is ongoing). There is a stream/ditch to the north and east of the lands. The Termonfeckin Road connects Beaulieu Village with Drogheda town centre, which is approximately 2km to the south west. As well as housing, there are a range of other community and social facilities in the area including schools, sports clubs, churches and also employment bases.



Fig. 1 – Aerial view of lands subject to this submission (outlined in red – note Beaulieu Village not indicated on aerial view)

4.0 Planning History

Downey Planning have carried out a detailed examination of the planning history of the subject site which determined that there have been a number of planning applications made on the subject lands. The most relevant planning history is summarised as follows:

Subject Lands

- **Reg. Ref. 08/001 (ABP Ref. PL15.230807)** – The Board granted permission to Manor Park Housebuilders on the subject lands for the delivery of 314 no. houses. An EOD permission was granted under Reg. Ref. 19/214. Phase 1 of that development is completed.
- **Reg. Ref. 18/001** – Louth County Council granted permission to Ravala Ltd for amendments to Ref. 08/001 to form Phase 2 of that parent permission, consisting of 87 no. dwellings. This Phase 2 development is ongoing.
- **Reg. Ref. 18/939** – Louth County Council granted permission to Ravala Ltd for amendments to Ref. 08/001 and consisted of 58 no. dwellings to form Phase 3 of the parent permission. **This is due to commence construction in January 2021.**

5.0 Planning Context

Having set out the location and history of the subject lands, this submission shall now set out the planning context of the subject lands.

5.1 National Planning Context

5.1.1 Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is *“the Governments high-level strategic plan for shaping the future growth and development of our country out to the year 2040”*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the NPF that, *“a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages.”*

The NPF seeks to target 50% of population growth to outside of the country’s five main cities (above 50,000 population) and to consolidate such growth into Ireland’s large towns, villages and rural areas. It is considered that the subject lands, being within the Drogheda, would be consistent with this aim.

The NPF states that, *“the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.”*

It is outlined within this Framework that future homes are required to be located where people have the best opportunities to access a high standard quality of life. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare.

It is stated that it is important to *“prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.”*

The overarching emphasis of the NPF is on renewing and developing existing settlements, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. In this regard, the NPF sets a target for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites.

The provision of a residential development on the subject site in this instance will therefore be in accordance with the NPF’s target of 40% of new housing to be located within existing towns and for 50% of population growth to take place within Ireland’s existing settlements, outside of the five larger cities (i.e. Dublin, Cork, Limerick, Waterford, Galway).

The NPF also seeks to develop stronger regions and towns, including County Louth (Dundalk/Drogheda), to support their continued economic growth and sustainable development. The NPF sets a number of policy objectives that support housing in appropriate locations such as these lands at Drogheda, including:

National Policy Objective 33: *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

National Policy Objective 35: *“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”*

5.1.2 Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)

‘Rebuilding Ireland, an Action Plan for Housing and Homelessness’, provides a multi-stranded, action-oriented approach to achieving many of the Government’s key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

The Action Plan comprises of 5 key pillars which are addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- *Addressing the unacceptable level of households, particularly families, in emergency accommodation.*
- *Moderating rental and purchase price inflation, particularly in urban areas.*
- *Addressing a growing affordability gap for many households wishing to purchase their own homes.*
- *Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty.*
- *Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth; and,*
- *Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.*

The rezoning of the existing land use for the subject lands, i.e. from 'H1 – Open Space' to 'A2 – New Residential', to provide for residential development on lands that can only be considered as infill housing that are contiguous to existing residential schemes at Beaulieu Village and Aston Village, will help the Government to achieve the objectives of the Housing Action Plan. Thus, it is submitted that the proposal is consistent with the policy in this regard.

5.2 Regional Planning Context

5.2.1 Eastern and Midlands Regional Spatial and Economic Strategy (2019)

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies.

RPO 4.1 states:

“In preparing Core Strategies for development Plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region.”

RPO 4.2 states:

“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.”

It is submitted that the subject lands, which our client is seeking to have rezoned from an 'H1 – Open Space' to an 'A2 – New Residential' land use zoning designation, have previously been designated for residential development and other schemes have been granted permission for residential development on lands immediately adjoining the site (please refer to Section 4 of this submission for further details in this regard).

The subject lands are within the existing built-up area of the town of Drogheda, in close proximity to schools, employment, leisure, recreation and community facilities and can connect to all the necessary services and utilities, which are all located within proximity of the lands.

5.3 Local Planning Context

5.3.1 Draft Louth County Development Plan 2021-2027

Draft Land Use Zoning 'Strategic Reserve'

Under the Draft Louth County Development Plan 2021-2027, our client's lands have been proposed to be zoned 'H1 – Open Space' as indicated in the land use zoning map pertaining to Drogheda (extract shown on Fig. 2 below). However, our client is seeking to have the zoning on their lands rezoned to 'A2 – New Residential', in keeping with the adjacent land use designations and the existing built environment of the surrounding area and in accordance with the earlier Drogheda Northern Environs Plan (2006).

The objective for the 'H1 – Open Space' land use zoning seeks "to preserve, provide and improve recreational amenity and open space". The guidance for this zoning states that, "This zoning refers to areas of 'active' and 'passive' open space. Development that will improve the facilities or quality of the open space, amenity or recreational facilities, or contributes to the enjoyment of the space will be considered." It is respectfully considered that this represents a total underutilisation of these serviced and accessible lands within Drogheda.

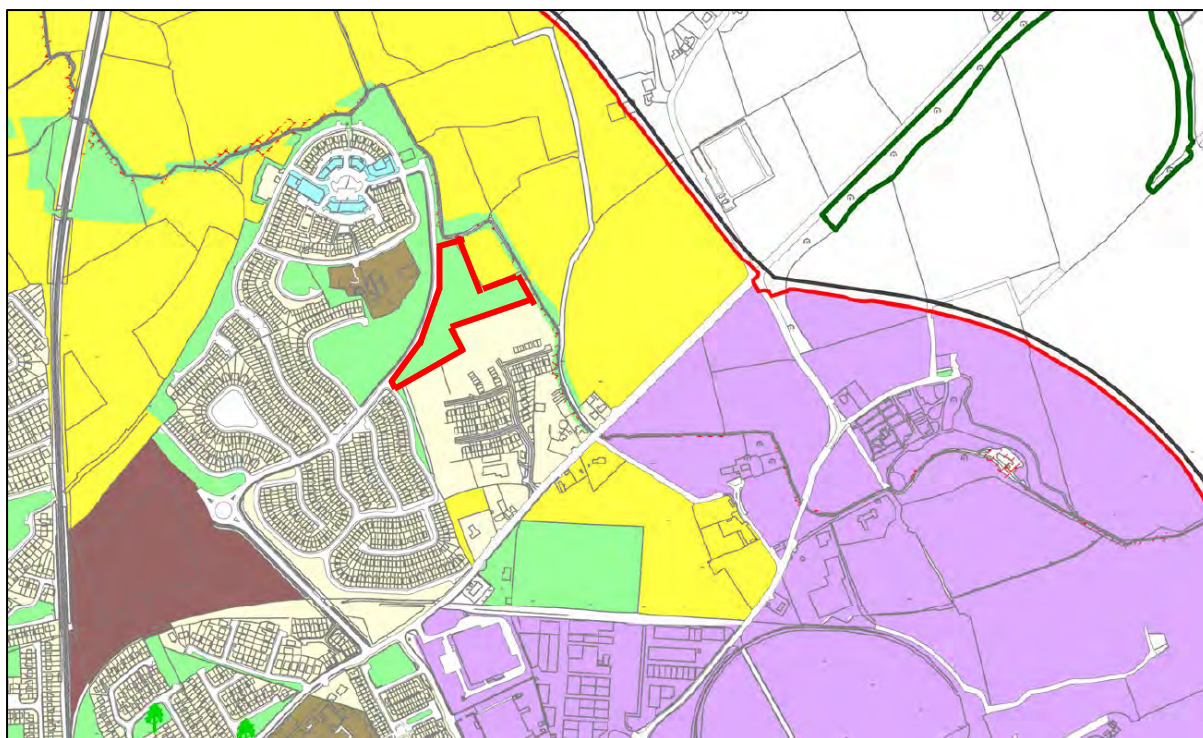


Fig. 2 – Land Use Zoning in the Draft Louth County Development Plan 2021-2027 (subject site outlined in red)

Our client wishes for their lands to be rezoned to ‘A2 – New Residential’, a land use zoning with an objective “to provide for new residential neighbourhoods and supporting community facilities”. The guidance for this zoning states that, “this is the primary location for new residential neighbourhoods. Any development shall have a high quality design and layout with an appropriate mix of housing and associated sustainable transport links including walking, cycling, and public transport to local services and facilities. The density of the development shall be reflective of the location of the lands, with higher densities required on more centrally located areas close to employment or services, or in strategic locations along public transport networks. In addition to residential development, consideration will also be given to community facilities, retail services and uses that would support the creation of a sustainable neighbourhood; provided such development or uses are appropriate in scale and do not unduly interfere with the predominant residential land use.”

The following are the land uses pertaining to the ‘A2 – New Residential’ zoning designation, which is the one sought by our client for the subject lands.

Generally Permitted Use

Allotments, B&B/ Guest House, Childcare Facility, Community Facility, Education Facility (Primary or Second Level), E- Charging Facility, Home Based Economic Activities, Nursing Home, Park/Playgrounds, Place of Worship, Recreational/Amenity Open Space, Recreational/Sports Facility, Residential, Residential Institution, Retirement Village, Sheltered Accommodation, Third Level Student Accommodation, Traveller Accommodation, Utilities.

Open for Consideration

Coffee Shop/Tea Room, Cultural Facility, Healthcare Practitioner, Restaurant, Shop ≤ 200m², Takeaway/Fast Food Outlet, Telecommunications Structures, Veterinary Surgery.

Fig. 4 – Permitted and Open for Consideration Uses pertaining to the A2 – New Residential land use zoning.

It is important to note that the adjoining lands are zoned 'A1 – Existing Residential', and thus the rezoning of our client's land to 'A2 – New Residential' will complement the overall land uses and assist in the consolidation of the town of Drogheda. Furthermore, the lands adjoin the existing residential areas of Aston Village and Beaulieu Village and it is therefore considered that the site would be suitable for residential development as it will support the consolidation of the built-up area of Drogheda and the sustainable growth of the town. This is in keeping with the pertaining national, regional and local policies and objectives for the area.

Core Strategy & Housing Policies and Objectives

As stated in the Draft Louth County Development Plan 2021-2027, the main aim of the Strategic Vision for the County seeks to:

“Promote County Louth, in particularly the Regional Growth Centres of Drogheda and Dundalk, as uniquely attractive places in which to live, work, visit, and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are to the highest standards.”

In this regard, the Draft Plan also seeks *“to achieve high standards in design and to build sustainable, healthy communities where people can enjoy a high quality of life.”*

As part of the Core Strategy, consideration of the settlement hierarchy of the RSES and the phasing of development lands is important to ensure towns grow at a sustainable and appropriate level to their position in the hierarchy. In relation to the Growth Strategy for County Louth and Self-Sustaining Towns, it is an objective of the County Council to:

“Support Self Sustaining Towns requiring contained growth, focusing on investment in services, employment and infrastructure whilst balancing housing delivery.”

Furthermore, the Draft Plan notes that there is a need to achieve ambitious targets for compact growth in urban areas, as indicated in the NPF and the RSES, with County Louth required to deliver at least 30% of all new homes within existing built-up footprints. The Draft Plan states that, *“achieving this target can be realised through urban regeneration and infill/brownfield site development, which 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 following are relevant objectives within the Core Strategy for the County:

CS2 – *“To achieve compact growth through the delivery of at least 30% of all new homes in urban areas within the existing built up footprint of settlements, by developing infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites.”*

CS6 – *“Direct and consolidate the majority of the County's future population growth into the strong and dynamic Regional Growth Centres of Drogheda and Dundalk in line with the objectives of the Regional Spatial and Economic Strategy and in accordance with the Core and Settlement Strategies of the Development Plan.”*

CS7 – *“Support the Regional Growth Centres of Drogheda and Dundalk as regional economic drivers targeted to grow to city scale with a population of 50,000 by 2031 and capitalise on their strategic location on the Dublin-Belfast Economic Corridor”.*

Regional Growth Centres: Drogheda

Relevant policy objectives for the town of Drogheda include:

SS 10 – *“To manage the growth of Drogheda in a manner that will achieve the creation of a compact settlement with attractive and inclusive sustainable neighbourhoods where there is a choice of affordable homes for all.”*

SS 11 – *“To support the coordinated development of the Northern Environs of Drogheda with the provision and delivery of sustainable social and community facilities and infrastructure in tandem with residential development.”*

Given the close proximity of the subject lands to the town centre of Drogheda, the existing residential development on surrounding lands as well as existing infrastructure, it is therefore considered that the rezoning of the subject lands to ‘A2 – New Residential’ will support and complement the granted permissions in adjacent lands and will assist in the consolidation of the built environment and residential area of Drogheda. Furthermore, the rezoning of our client’s lands will be in compliance with the relevant planning policies and objectives for the area at a national, regional and local level, and in accordance with the principles of proper planning and sustainable development of the area.

6.0 Justification and Grounds of Zoning Submission

This planning submission proposes to have the lands identified as ‘H1 – Open Space’ rezoned to ‘A2 – New Residential’, which is in keeping with the granted permissions of the surrounding lands and with the land use zoning designation for adjacent lands.

Downey Planning have set out in Section 5 of this report how the proposed rezoning of the subject lands would be consistent with national, regional and local planning policy. Notwithstanding this, Downey Planning shall now set out further justification regarding the grounds of this rezoning submission.

6.1 Site Assessment & Land Use Evaluation

In order to determine the suitability of a site for development, *“the NPF acknowledges that infrastructure availability is not the only criteria in determining the suitability of a site for development. Other factors include location, the scale of development envisaged, proximity to and availability of services and amenities, accessibility to transport, and environmental issues such as flooding.”*

In this regard, our client’s lands are situated on lands that were identified for residential use under the Northern Drogheda Environs Plan (2006) and are situated immediately adjoining lands that are already developed or under construction as part of the delivery of the Northern Environs, specifically Beaulieu Village and Aston Village.

The lands have direct access onto the existing road network into Drogheda and would therefore require no major road development to service the lands. There is also existing mains water and foul

water that can be connected to the lands to service their future development. In this regard, it is respectfully considered that the rezoning of the lands back to Residential use, will contribute to the delivery of consolidated and compact growth of Drogheda through the construction of infill residential development within an existing residential area.

Importantly, there is an extant planning permission pertaining to these lands (Reg. Ref. 18/939) comprising 58 no. dwellings as Phase 3 of the parent permission (Ref. 08/001) of Beaulieu Village. This is due to commence construction in January 2021.

Furthermore, it is noted that the lands are not subject to flood risk (zones A or B) as identified by the Land Use and Flood Zone Maps that form part of the Draft Development Plan. There is no reasonable basis for which the lands would be zoned as Open Space. Downey Planning respectfully request that Louth County Council review this submission and rezone our client's lands at Beaulieu Village to 'A2 – New Residential'.

6.2 Serviceability & Accessibility of the lands

In terms of available services and accessibility of the subject lands, our client's lands are well-serviced and are readily available to connect to the existing water infrastructure. In this regard, connection has already been made for the existing and permitted developments at Beaulieu Village (which our client is constructing) and these lands would similarly connect to the same services.

The lands are accessible from the existing road and footpaths to the west of the lands that connect onto the Termonfeckin Road (R166) and from there to the centre of Drogheda.

Downey Planning are of the professional opinion that the subject lands represent well-serviced and highly connected lands, which can be defined as Tier 1 Serviced Lands and therefore should be considered for rezoning in the Draft Louth County Development Plan 2021-2027 from 'H1 – Open Space' to 'A2 – New Residential'.

6.3 Consolidation of the Built Environment of the Area & Urban Design Basis

As stated previously, the subject lands are considered infill lands, adjoining existing residential lands and, in fact were identified for residential development under the Drogheda Northern Environs Plan (2006). It is noted that there is a significant quantum of existing public open space to the immediate west of the subject site. This open space adjoins Aston Village and the Educate Together School. To place another large quantum of public open space on our client's lands would appear to represent an inefficient use of serviced land within the urban area of Drogheda.

A more appropriate use of these lands would be to facilitate their development for residential use in a manner that provides an attractive and active frontage onto the existing road and creating passive surveillance over the existing public open space to the west.



Fig. 3 – Potential for Passive Surveillance (indicated by ←)

From an urban design and development management perspective, the provision of housing on these lands would be more appropriate. It is also noted that as part of any planning application on the lands, a portion of the lands would also be required to be provided as public open space for the amenity of the future residents and wider public. This will provide for a more consolidated approach to the built environment as opposed to large expanses of open space that will be underutilised and not required.

6.4 Housing Needs & Delivery

As noted in the Draft Plan, there is a projected housing requirement of 10,318 houses between 2016-2027, with a projected housing requirement of 8,278 units over the Plan period (2021-2027) given that the approximate number of units completed between 2016-2020 is circa 2,040 units. This equates to approximately 1,379 units per year to be delivered within the County. The housing requirements pertaining to the current Development Plan envisioned a total of 4,001 units to be provided between 2015-2021, or an average of 667 units per annum. According to the Housing Strategy for the Draft Plan, an approximate of 2,040 units were delivered between 2016-2020, thus it can be argued that the projected target for the Plan was not met.

In this regard and taking into consideration the projected increase in population for the Plan period, it can be argued that there is pent-up demand for housing in the area. Therefore, it remains critical that sufficient lands are zoned for residential purposes under the new Development Plan. It is worth noting that while lands can be zoned, it does not guarantee that they will be brought forward for development and thus the Core Strategy needs to ensure that there more than sufficient headroom catered for. However, our client is a proven and well-established house builder who has been delivering homes for 25 years in the area, including adjoining the subject lands and as such the rezoning of the lands should be considered as delivering new homes in accordance with the Housing Strategy of the Draft Development Plan.

As identified in both draft Development Plan, our client's site is currently proposed to be zoned for 'H1-Open Space', the rezoning of the subject lands to 'A2 – New Residential' will potentially assist in the delivery of a housing scheme across the entire site, which would be fundamental to accomplish the 30% target for new homes within the County. However, if the subject lands are designated as 'H1 – Open Space, this potential cannot be achieved on a site that is well-connected and readily available for development.

It is also important to note that the Office of the Planning Regulator, as part of their submission on the Draft Plan, questioned the population targets for both Dundalk and Drogheda and suggested that more growth should be earmarked for these strategic towns. This should be considered that there is potential for the existing Draft Plan to have underprovided the quantum of zoned residential land in the area and thus the rezoning of our client's lands will go some way towards meeting the true requirement for housing in the area.

7.0 Conclusion

This submission has been prepared by Downey Planning on behalf of our client, J Murphy Group, wish to make this submission to Louth County Council regarding the Draft Louth County Development Plan 2021-2027.

Our client owns approximately 23 hectares of lands at Beaulieu Village, Termonfeckin Road, Newtownstalaban, Drogheda, Co. Louth, part of which has been developed for residential use and part of which is currently under construction. It is our client's intention to develop out the remainder of the land holding in accordance with the Vision of the North Drogheda Environs Plan 2006.

However, under the currently proposed Draft Louth County Development Plan, approximately 1.8 hectares of lands are to be 'dezoned' to 'H1-Open Space'. Our client is seeking to have these 1.8 hectares of land zoned as 'A2 – New Residential', in keeping with the Vision of the North Drogheda Environs Plan 2006 and with the ongoing residential development taking place at Beaulieu Village by J. Murphy Developments.

Section 5 of this submission has identified that the rezoning of the lands to residential use is in accordance with national, regional and local planning policy. Furthermore, the rezoning of the subject lands is justified on the following grounds:

- There is an extant planning permission pertaining to the subject lands for 58 dwellings (granted under Reg. Ref. 18/939) that forms Phase 3 of the larger Baeulieu Village development. This is due to commence construction in January 2021.
- The lands have been zoned for residential development since the Northern Environs Plan (2006).
- The Draft Development Plan does not place any flood risk to the subject lands that would warrant them to be dezoned to Open Space. In this regard, it may be that it is a mapping error that has placed an incorrect colour/zoning on the Drogheda Composite Map within the Draft Development Plan.

- The zoning of the subject lands as ‘A2 – New Residential’ is in accordance with the policies and objectives of the Development Plan and national and regional planning policies such as the NPF and RSES.
- Should the lands be zoned as ‘H1 – Open Space’ then it would prevent much needed family homes being delivered in the area, including those for social and/or affordable housing. The delivery of family homes will help to sustain essential services and retail/commercial outlets in the area, as well as support the consolidation and sustainable growth of Drogheda.
- The provision of Open Space is not justified or required in terms of providing any strategic scale parks or leisure facilities. These have previously been identified elsewhere within the North Drogheda Environs Plan (2006).
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In light of this, Downey Planning respectfully request that Louth County Council amend the Draft Louth County Development Plan 2021-2027 by changing the zoning objective for the subject lands from ‘H1 – Open Space’ to ‘A2 – New Residential’.