
Louth County Development Plan Review

Priest Hill, Collon, Co. Louth

Draft County Plan Submission



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1.0 INTRODUCTION.

- 1.1 EHP Services has been appointed by Mr David Keane to make the following submission to Louth County Council's Forward Plans Team in respect of the draft Louth County Development Plan 2021-2027.
- 1.2 The Submitter requests the draft County Plan provides the village of Collon with additional A2 - New Residential zoned lands than has been provided to better facilitate the delivery of varied housing types and tenures for the projected increase in population. To facilitate the proposed amendment Composite Map and Zoning and Flood Zones Map 4.3 require revision.
- 1.3 The subject site forms part of a larger landholding identified on Map 1 below in red and blue respectively. The landholding which comprises of three adjoining fields and is located along the R168 in Priest Hill is approximately 3.5 hectares of which the subject site is approximately 1.1 hectares. The subject site is abutted by the Tinure Road (L2290) to the north, the Drogheda Road (R168) to the south, a small enclave of 8no. dwellings to the west and the remaining fields under the Submitter's ownership to the east.
- 1.4 The following statement will demonstrate that the single area of ground zoned as A2- New Residential within the village and subsequently the sole provision for new residential development is not tenable approach to meeting the target population's housing requirements.



Map 1: Site Location Map

Source: Google Maps 2020

2.0 PLANNING POLICY CONTEXT.

2.1 The following section sets out how the proposed revision to Collon's settlement boundary to include the subject site and delete other specified sites will facilitate development which is consistent with the proper planning and sustainable development of the village and encouraged throughout national, regional and local tiers of planning guidance and policy objective.

Project Ireland 2040: National Planning Framework.

2.2 In developing a new region focused strategy for managed growth the National Planning Framework (NPF) acknowledges half of such growth will be focused on Ireland's large and smaller towns, villages and rural areas. The NPF's new strategy for managing growth includes a major new policy emphasises 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*'. The target is for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages.

2.3 One of the NPF's National Strategic Objectives is consolidated growth as a means of managing the sustainable growth of compact towns and villages as a means of adding value and creating more attractive places for people to live and work and building resilience into rural settlements as a means of reversing rural town/village and population decline.

2.4 The NPF sets out core principles for the delivery of resilient and diverse future housing including allowing '*... for a choice in housing location, type, tenure and accommodation in responding to need*'. It outlines a number of national policy objectives (NPO) aimed at providing an output of '*...at least 25,000 new homes...*' between 2018 and 2040 per year to meet people's needs for '*...well-located and affordable housing, with increasing demand to cater for one and two-person households*' including:

NPO 3a - *Deliver at least 40% of all new homes nationally within the built up footprints of existing settlements.*

NPO 3c - *Deliver at least 30% of all new homes in settlements other than the five Cities (Dublin, Cork, Limerick, Galway and Waterford) and their suburbs, within their existing built-up footprints.*

NPO 33 - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

2.5 Section 4.5 of the NPF states a significant proportion of future urban development is targeted on infill/brownfield development sites within '*... the built footprint of*

existing urban areas ...' which is applicable to all scales of settlement, from the largest city to the smallest village. The NPF advocates for compact or contained growth of urban settlements by '... targeting infill lands, some of which will be brownfield sites, in existing built-up areas...'

Regional Spatial & Economic Strategy.

- 2.6 The Regional Spatial and Economic Strategy (RSES) seeks to determine at a regional scale how best to achieve the shared goals set out in the National Strategic Outcomes (NSOs) of the NPF. The RSES recognises that lower tier towns and villages should '*... provide for commensurate population and employment growth, providing for natural increase and to become more economically self-sustaining, in line with the quality and capacity of public transport, services and infrastructure available'*.

- 2.7 One of the Regional Strategic Outcomes of the RSES is compact growth and urban regeneration. RSO 2 states:

Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. (NSO 1)

- 2.8 Facilitating housing is paramount to ensuring the sustainability, vitality and viability of the rural places of the Region. Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth. To that end Regional Policy Objectives (RPOs) 4.78 and 4.83 state:

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.

RPO 4.83: Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.

Guidelines to Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

- 2.9 The Guidelines recognises smaller towns and villages are an important part of Ireland's identity and the distinctiveness and economy of its regions. Many villages, particularly those within easy commuting range of principal cities and towns have experienced a wave of development in recent years, particularly residential developments. In many cases such development has brought positive

benefits in the form of extra housing supply and enhancement of the viability of local shops and public services. However, in some cases, there is concern about the impact of rapid development and expansion on the character of smaller towns and villages through poor design approaches.

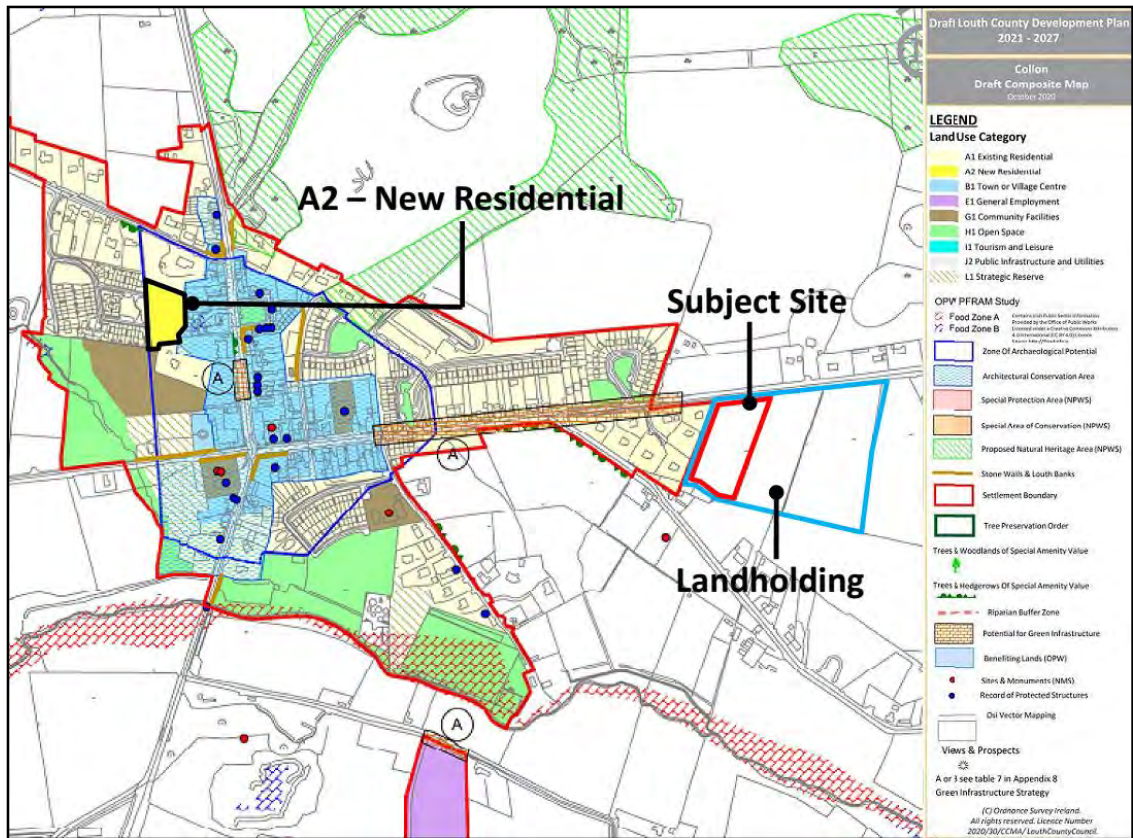
Louth County Development Plan 2015-2021.

- 2.10 Collon is identified in the current County Plan as a Level 3 rural village. It is an objective of the County Plan to ensure development within such villages is commensurate with the settlement's scale, nature and extent. Policy SS 9 sets out the need to ensure new development supports the settlement's identified role within the County settlement hierarchy and states:

SS 10 To promote and facilitate limited development within Level 3 Settlements that is commensurate with the nature and extent of the existing settlement, to support their role as local service centres and to implement the policies and objectives relative to each settlement as provided for in Appendix 2, Volume 2 (a).

3.0 JUSTIFICATION FOR REVISED BOUNDARY & REZONING.

- 3.1 The draft County Plan reclassifies Collon as a Level 4 Small Town or Village. Table 2.14 of the draft County Plan provided a breakdown of projected population growth within the Plan's six year lifespan and the distribution of allocated new housing for each tier of settlement. The draft County Plan estimates an additional 414no. dwellings will be required in all Level 4 settlements during its lifespan. It does not breakdown how many of those would be provided within the Collon settlement boundary.
- 3.2 The draft Zoning Map indicates only one large enough area sufficient to accommodate a speculative, multi-unit residential scheme that could be targeted at the local community. It is located to the rear of the Doire Beag estate to the west and behind Ardee Street to the east. Map 2 below illustrates this area's position relative to the subject site.



Map 2: Proposed Collon Zoning Map

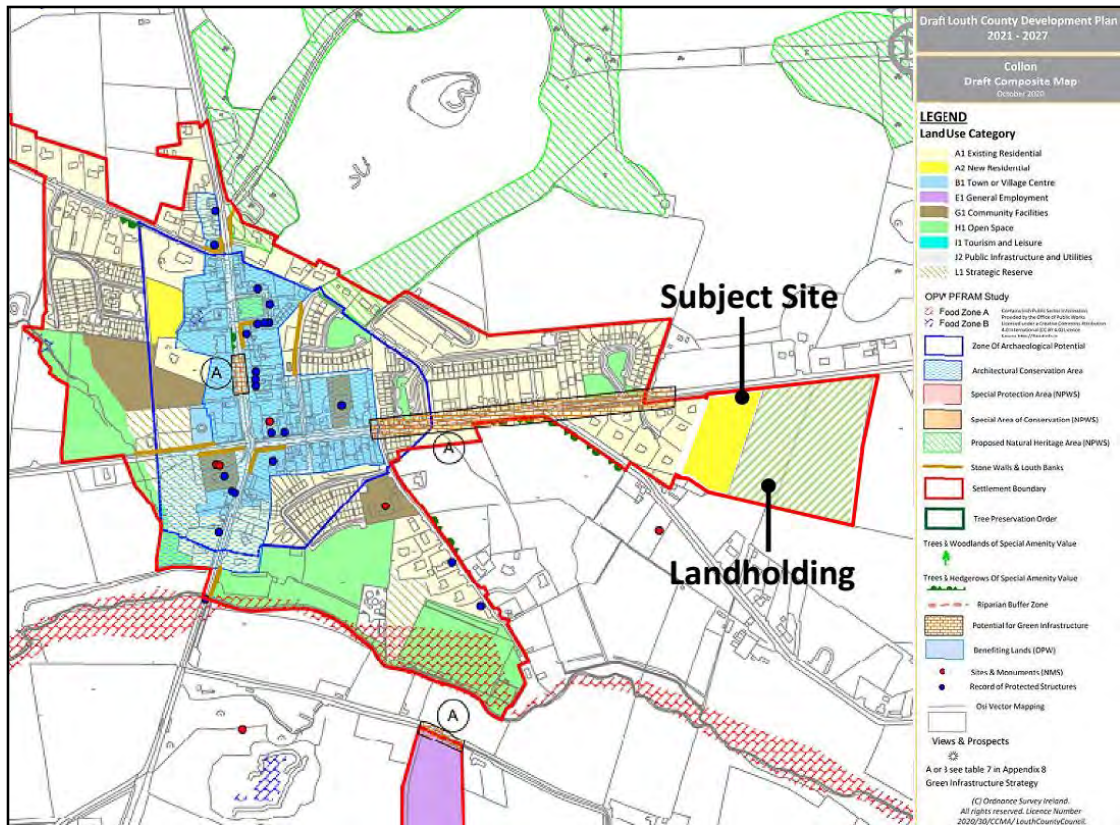
Source: draft Louth County Development Plan 2021-2027

3.3 A review of the County Council’s online planning website confirms this area of A2 New Residential zoned land has not been subject of any application for planning permission. Relying upon a single area for the majority of Collon’s future housing provision is unsustainable and a unsound approach contrary to the dart Plan’s Policy Objectives SS 54 and COL 3 which state:

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.*

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.*

3.4 The proposed realignment of the village boundary and rezoning of lands as illustrated in Map 3 overleaf would facilitate the Submitter’s plan to see the subject site developed and redress the lack of sufficient zoned lands to meet Collon’s projected population growth over the next six years.



Map 3: Alternative Settlement Boundary & Zoning Map

Source: draft Louth County Development Plan 2021-2027

3.5 The proposed revisions to the Composite Map and Map 4.3 would facilitate development that would meet Collon’s housing needs in the short to medium term and place the remaining landholding in reserve for a time if, or indeed when, additional housing provision if required. The proposed revisions would promote development that would allow for the local population to remain in the village as opposed to relocating to Drogheda, Dundalk or further and strengthen the existing urban fabric and social cohesion of the local community.

3.6 The proposed revisions would in our opinion would also be 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.

- 3.7 In addition to accommodating people from the village within a development of commensurate scale, density and design as adjoining housing clusters new housing within the subject site would present opportunities for people who do not qualify for rural one-off housing but still wish to live rurally. In doing so the principle of development would be compliant with Policy Objective CS 15.
- 3.8 The proposed amendments and the subsequent rezoning of the subject site will not materially or detrimentally effect of the balance set out in the draft County Plan's Housing Strategy but will in fact ensure that there are sufficient zoned lands available at more location to meet a future housing requirement throughout the lifespan of the draft County Plan.
- 3.9 In this regard we hope the County Council is favourably disposed to our submission and will make the necessary alterations to the Composite Map and Map 4.3 as requested.
- 3.10 If the Forward Plans Team has any queries regarding this submission please do not hesitate to contact us.