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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 Drogheda Road, Balfeddock, Termonfeckin, Co. Louth from 'L1 – Strategic Reserve' 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.

Our client is seeking to have 5.3 hectares of their lands at Drogheda Road, Balfeddock, Termonfeckin, Co. Louth rezoned from 'L1 – Strategic Reserve' 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 Drogheda Road, Balfeddock,
Termonfeckin, 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 5.3 hectares of lands at Drogheda Road, Balfeddock, Termonfeckin, Co. Louth. Under the current Development Plan for the area, the lands are zoned for 'Strategic Reserve' land uses.
- However, under the Draft Development Plan, these lands have been proposed to be zoned as 'L1 – Strategic Reserve', thus maintaining the existing land use zoning designation as per the current Development Plan.
- Our client is seeking to have their lands zoned as 'A2 – New Residential', in keeping with the granted permissions of the surrounding lands and with the land use zoning designation for adjacent lands.
- Should the lands continue to be zoned as a 'Strategic Reserve' 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.
- 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 5.3 hectares of lands at Drogheda Road, Balfeddock, Termonfeckin, Co. Louth. The lands owned by our client, and subject to this submission, have been proposed to be zoned as 'L1 – Strategic Reserve' under the Draft Louth County Development Plan 2021-2027. However, our client is seeking to have the subject lands zoned as 'A2 – New Residential', in keeping with the granted permissions of the surrounding lands and overall zoning for the area. 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 Balfeddock, Termonfeckin, which is within the functional area of Louth County Council. The lands extend to approximately 5.3 hectares and are situated to the south side of the town of Termonfeckin, approximately 7 km to the north east of Drogheda.

The site comprises agricultural lands, which are bounded to the west by the Drogheda Road (R166), to the east by existing residential dwellings and the Baltray Road (R167), to the north by existing houses and to the south by agricultural lands and the link road between the Baltray Road and the Drogheda Road provided by the developers of the adjoining land.

The Baltray Road (R167) connects Termonfeckin to Baltray. The Drogheda Road (R166) is located to the west boundary of the site connecting Termonfeckin with Drogheda to the south. There are bus stops (Route 168) within Termonfeckin town centre, situated c.850m to the north of the site which connect the town with Drogheda and the Drogheda Bus Station.

The subject site is situated c.500m from the town centre (approx. 6 minutes' walk) and enjoys excellent connectivity to the various amenities, community facilities, school and recreational areas offered by the town. The surrounding built environment is characterised by residential, community, educational and agricultural developments with a mix of building types. There are a number of dwellings adjacent the site, which include bungalows or dormer dwelling units.



Fig. 1 – Aerial view of lands subject to this submission (outlined in red)

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:

4.1 Subject Lands

- **Reg. Ref. 06/265 (ABP Ref. PL15.220464)** – By Order dated 16th April 2007, An Board Pleanála granted planning permission to John Walsh & Patsy & John McCabe for development consisting of: 40 Four bedroom 2-3 storey detached, semi-detached and terraced houses; 63 three-bedroom 2 storey semi-detached and terraced houses; 28 two-bedroom 1-2 storey semi-detached and terraced houses; a 246sqm single storey creche; a 57 bed (2688sqm) 2 storey over part basement nursing home; a 782 sqm community hall; a 854 sqm 2-storey pub-restaurant; 6 (69sqm) workshop-live units with 6 three-bedroom duplex units over; a 1073 sqm supermarket with 5 two-bedroom and two three bedroom duplex units over; 504sqm of ground floor retail space with 1059 sqm of office space on two levels; with three vehicular accesses from the R166 Drogheda Road and all associated car parking, landscaping, boundary treatments and infrastructural site works, including a new well, on a site extending to 6.46 ha(16acres) east of the R166 Drogheda Road. Total number of dwellings 144. Lands at Drogheda Road, Balfeddock, Termonfeckin, Co Louth.
- **Reg. Ref. 1224** – By Order dated 22nd March 2012, Louth County Council granted extension of duration of planning permission to John Walsh & Patsy & John McCabe for development consisting of: Extension of Duration of Planning Permission 06/265 which consists of 40 Four bedroom 2-3 storey detached, semi-detached and terraced houses; 63 three-bedroom 2

storey semi-detached and terraced houses; 28 two-bedroom 1-2 storey semi-detached and terraced houses; a 246sqm single storey creche; a 57 bed (2688sqm) 2 storey over part basement nursing home; a 782 sqm community hall; a 854 sqm 2-storey pub-restaurant; 6 (69sqm) workshop-live units with 6 three-bedroom duplex units over; a 1073 sqm supermarket with 5 two-bedroom and two three bedroom duplex units over; 504sqm of ground floor retail space with 1059 sqm of office space on two levels; with three vehicular accesses from the R166 Drogheda Road and all associated car parking, landscaping, boundary treatments and infrastructural site works, including a new well, on a site extending to 6.46 ha (16 acres) east of the R166 Drogheda Road. Total number of dwellings 144. Granted by ABP ref PL 15.220464. Lands at Drogheda Road, Balfeddock, Termonfeckin, Co Louth.

4.2 Lands to the immediate south

Additionally, there is relevant and recent planning history on the lands to the immediate south that have been considered in this examination, this planning permissions are summarised as follows:

- **Reg. Ref. 01487** – By Order dated 13th November 2001, Louth County Council granted planning permission to Tricast Developments Ltd for development consisting of the construction of 9 no dwelling (OPP Ref 96320) on lands at Balfeddock, Termonfeckin.
- **Reg. Ref. 011487 (ABP Ref. PL.18767)** – By Order dated 10th September 2002, An Board Pleanála refused planning permission to Tricast Developments Ltd for development consisting of the construction of 9 no. dwelling houses on lands at Balfeddock, Termonfeckin, Co Louth.
- **Reg. Ref. 06/943 (ABP Ref. PL15.220340)** – By Order dated 13th April 2007, An Board Pleanála granted planning permission to Seamus Comer & Kieran Argue for development consisting of the construction of 495.6 linear metres of road with footpaths and cycle path crossing lands at Balfeddock, Termonfeckin and connecting the R166 (Drogheda/Termonfeckin Road) and the R167 (Baltray Road). The proposed new road incorporates two access points to serve lands located to the south of the road and two access points to serve lands located to the north of the road. Lands at Balfeddock, Termonfeckin, Co. Louth.
- **Reg. Ref. 08/206 (ABP Ref. PL15.229151)** – By Order dated 19th November 2008, An Board Pleanála granted planning permission to Kieran Argue & Seamus Comer for development on a 4.4 hectare site; amendments to previously granted Planning Permission (06/062, ABP ref PL 15.220167), consisting of the following; construction of new single storey conservatory sunrooms to the rear of previously granted two storey detached A1, A2 and B1, B2 Type Houses; and revised house types (from A2 types to B1 types) to site nos. 25 and 29 at the above development; on lands at Baltray Road, Balfeddock, Termonfeckin, Co. Louth.
- **Reg. Ref. 16/722** – By Order dated 7th July 2017, Louth County Council granted planning permission to Cheverdale Ltd. for development at the partially constructed unfinished "ghost" estate known as "Balfeddock Manor" at Baltray Road, Balfeddock, Termonfeckin, Co. Louth. The development will consist of a) the demolition of the 2 no. detached two storey dwellings facing the Baltray to Termonfeckin Road and construction of 2 No. detached single storey dwellings in their place, b) the construction of a total of 51 no. dwellings (including the 2 no. detached single storey dwellings), some with detached garages, in a mix of detached and semidetached form ranging in height from single storey to two storey with each dwelling having an option for the installation of photovoltaic/solar panels on front and/or rear roof slopes and c) completion of existing partially constructed access onto R167 Baltray to

Termonfeckin Road. The application site was previously granted planning permission under P.A. Ref. No. 06/62 and confirmed by An Bord Pleanála (Ref. No. PL 15.220167) for the same number of dwellings (51) as are now proposed. The development provides for the completion of a section of the previously approved Link Road between the Termonfeckin to Drogheda Road (R 166) and the Baltray to Termonfeckin Road (R 167), including provision of cyclepaths. The development also provides for all associated site development works including alterations to ground levels, internal roads, car parking, footpaths, open space, public lighting, landscaping and boundary treatments; on lands at Baltray Road, Balfeddock, Termonfeckin, Co. Louth.

- **Reg. Ref. 18/897** – By Order dated 29th January 2019, Louth County Council granted planning permission to Cheverdale Ltd. for development at the partially constructed unfinished "ghost" estate known as Balfeddock Manor. The development will consist of alterations to permitted development (P.A. Ref. 16/722). The overall number of dwellings remains as per the permitted development i.e. 51. The alterations to the permitted development include a change in house types, alterations to the internal layout including road layout and layout of public open space, and consequential alterations to permitted site development works, the retention of the two existing two storey dwellings facing the Baltray to Termonfeckin Road (previously proposed for demolition). The overall dwelling mix proposed is 19no. detached and 32no. semi-detached (previously permitted 34no. semi-detached and 17no. detached). The alterations sought also omit previously permitted garages. As per the permitted development all dwellings have the option for the installation of photovoltaic/solar panels on the front/rear roof slopes. Vehicular access to the development is from the existing permitted access road onto the R167 (Baltray/Termonfeckin Road); on lands at Balfeddock Manor, Baltray Road, Balfeddock, Termonfeckin, Co. Louth.
- **Reg. Ref. 19/711** – By Order dated 18th November 2019, Louth County Council granted planning permission to Wakeward Limited for development consisting of 2 storey extensions to proposed houses no. 1 to 5 as granted under permitted development (P.A. Ref. 16/722 and amended under 18/897), and any associated site work; on lands at Balfeddock Manor, Baltray Road, Termonfeckin, Co Louth.
- **Reg. Ref. 19/907** – By Order dated 22nd January 2020, Louth County Council granted planning permission to Wakeward Limited for development consisting of alterations to development permitted under planning ref. 16/722 and amended under planning ref. 18/897 and will include replacement of 12 no. 3 bedroom dwellings numbered 8 to 17 and 2 no. 4 bedroom dwellings numbered 18 - 19 under planning ref. 18/897 with 18 dwelling houses 4 no. detached 4 bedroom houses, 12 no. semi-detached 3 bedroom houses and 2 no. semi-detached 2 bedroom houses and any associated site works; on lands at Balfeddock Manor, Baltray Road, Termonfeckin, Co Louth.
- **Reg. Ref. 20/169** – By Order dated 3rd December 2020, Louth County Council made a decision to grant planning permission to Wakeward Limited for development consisting of alterations to development permitted under planning ref. 16/722 and amended under planning ref. 18/897 and will include replacement of 7 no. 4 bedroom dwellings numbered 20-26 and 10 no. 3 bedroom dwellings numbered 27 to 36 under planning ref. 18/897 with 35 dwelling houses including 7 no. detached 4 bedroom houses, 20 no. semi-detached 3 bedroom houses, 4 no. end-terrace 3 bedroom houses, 2 no. semi-detached 2 bedroom houses, 2 no. mid-

terrace 2 bedroom houses and any associated site works; on lands at Balfeddock Manor, Baltray Road, Termonfeckin, Co Louth.

The following represents the planning history pertaining to sites immediately adjoining the lands further south:

- **Reg. Ref. 93/380** – By Order dated 14th July 1999, Louth County Council granted planning permission to TRICAST DEV. LTD. for development consisting of the construction of 143 dwelling houses (45 of which were granted); on lands at Termonfeckin, Co Louth.
- **Reg. Ref. 00/1649** – By Order dated 20th June 2001, Louth County Council refused planning permission to Tricast Developments Ltd for a housing development consisting of 202 dwellings; on lands at Balfeddock, Termonfeckin, Co Louth.
- **Reg. Ref. 06/62 (ABP Ref. PL15.220167)** – By Order dated 12th July 2007, An Board Pleanála granted planning permission to Kieran Argue & Seamus Comer for development consisting of 51 no. 5 bedroom detached houses, including the provision of public open space, internal roads and site access points, footpaths, landscaping and all other site works required to facilitate the development; the construction of an internal road serving 5 no. houses with 2 no. access points on Baltray Road; and the construction of a section of a link road from Baltray Road to the Western boundary of the application site as part of a road linking Baltray Road to the east and the Drogheda/Termonfeckin Road to the West; on lands at Baltray Road, Balfeddock, Termonfeckin, Co Louth.
- **Reg. Ref. 00/1628** – By Order dated 20th June 2001, Louth County Council refused planning permission to Tricast Developments Ltd for development consisting of 50 houses (8 no. 3 bedroom semi-detached, 30 no. 4 bedroom and 12 no. 5 bedroom detached dwellings); on lands at Balfeddock, Termonfeckin, Co Louth.
- **Reg. Ref. 031330 (ABP Ref. PL15.208032)** – By Order dated 20th June 2001, Louth County Council refused planning permission to Tricast Developments Ltd for development consisting of the construction of nine two-bedroom detached units plus garage (house type A), eight two-bedroom semi-detached houses (house type B), 16 three-bedroom detached houses (house type C), nine four-bedroom and study detached houses (house type D) and nine five-bedroom and study detached houses (house type E). Overall total 51 units, new boundary walls/fences, new vehicular access from Baltray Road (R167) and internal circulation roads/footpaths and all site ancillary services and landscaping works on an overall site of 17.67 hectares on lands at Balfeddock, Termonfeckin, County Louth.

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 Termonfeckin catchment, 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 Termonfeckin, 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 'L1 – Strategic Reserve' to 'A2 – New Residential', to provide for residential development on lands that are contiguous to existing residential schemes 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 ‘L1 – Strategic Reserve’ to an ‘A2 – New Residential’ land use zoning designation, have previously been granted permission for a housing scheme, but unfortunately that permission was not implemented and has since expired. It is also important to note that other schemes have been granted permission for residential development on lands immediately adjoining the site, i.e. Reg. Ref. 19/907. Please refer to Section 4.2 of this submission for further details in this regard.

The subject lands are contiguous to the existing built-up area of the town of Termonfeckin, in close proximity to Scoil Naomh Feichin (Termonfeckin National School) and has direct road frontage onto the R166, with connection to the R167, 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 Louth County Development Plan 2015-2021

The subject site is zoned ‘Strategic Reserve’ under the current Louth County Development Plan 2015-2021. Strategic reserve is the primary land use of this zone. The objective of the land use zoning as stated in the Louth County Development Plan 2014-2020 indicates:

“The following uses will be open for consideration: utility structures, playing fields, park/playground and one - off housing on a limited basis only, for the son or daughter of a qualifying landowner or niece or nephew of a single person or childless couple of a qualifying landowner. For the purpose of this provision, a qualifying land owner is where the land has been in family ownership for a minimum of 10 years. One house only will be granted in the case of a niece or nephew.”

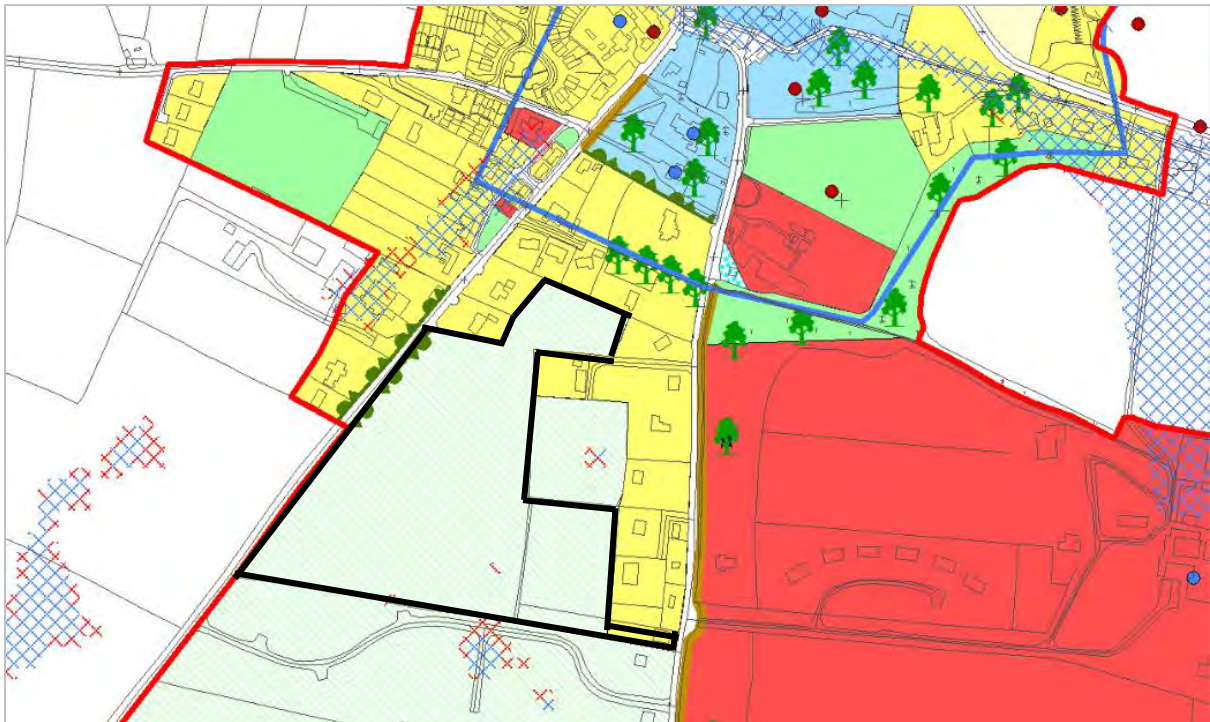


Fig. 2 – Existing Zoning Map from the Louth County Development Plan 2015-2021 (site outlined in black)

It is of worth mentioning that the subject lands are generally bounded by the ‘Residential (Existing)’ land use zoning, which seeks *“to protect and/or enhance existing residential communities and provide for new residential communities”*. As such, the principal permitted land use in this zone is residential development.

Louth County Council as one of its many aims states that it strives to implement national housing policy, to ensure the provision of housing for the existing and future population of the County, as well as enabling every household *“to have available an affordable dwelling of good design, suited to its needs in a quality environment as far as practicable.”*

5.3.2 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 ‘L1 – Strategic Reserve’ as indicated in the land use zoning map pertaining to Termonfeckin (extract shown on Fig. 3 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.

The objective for the ‘L1 – Strategic Reserve’ land use zoning seeks *“to provide a land reserve for the orderly expansion of the settlement into the future”*. The guidance for this zoning states that, *“these are strategically located lands that will generally not be available for development until after the expiration of this Draft Plan.”*

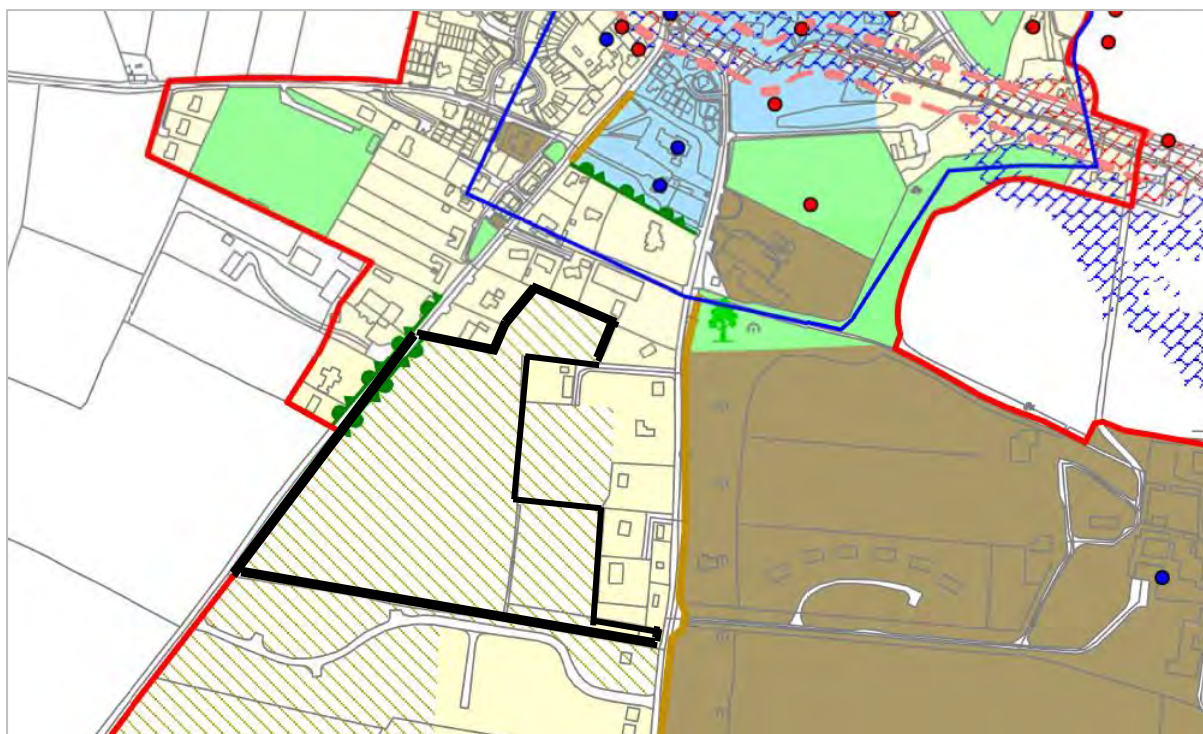


Fig. 3 – Land Use Zoning in the Draft Louth County Development Plan 2021-2027 (subject site outlined in black)

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 residential area for Termonfeckin. Additionally, a number of dwellings adjoin the subject lands, which is located in close proximity to the town centre and within the 500m ratio of same, 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 Termonfeckin 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.”*

CS13 – *“To ensure proportionate, contained and compact growth within the Self Sustaining Towns identified in the Settlement Hierarchy, with focused investment in*

green industry, services, infrastructure and employment whilst balancing housing delivery.”

Our client’s lands, which are subject to this submission, are located in Baldeffock, Termonfeckin. Termonfeckin is identified in the Core Strategy as a Self-Sustaining Town. As such, Self-Sustaining Towns “*require investment in services, employment and infrastructure whilst balancing housing delivery*”. As stated within the Draft Plan, the Settlement Hierarchy for the County describes Self-Sustaining Towns as those towns “*with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining*”, and also include Carlingford, Castlebellingham/Kilsaran, Clogherhead and Tullyallen, alongside Termonfeckin.

As indicated in Table 2.14 (Core Strategy Table) of the Draft Plan, the total lands zoned for New Residential uses for Termonfeckin stands at 2.4 hectares. In addition to this, there is a projected population increase of 250 by the end of the Plan period, which equates to 1.2% of total growth for the town. It is respectfully submitted that the zoning of the subject lands as ‘A2 – New Residential’ will facilitate the growth of Termonfeckin in a sustainable and commensurate level and support the future provision of housing for the projected population increase for the town.

In this regard, the subject lands are surrounded by existing housing and are within 500m of the centre of Termonfeckin. The development of the lands for housing purposes would facilitate the compact growth of Termonfeckin and provide modern housing, including social and/or affordable houses.

Self-Sustaining Towns: Termonfeckin

In relation to Termonfeckin, the Draft Plan indicates that the town “*experienced rapid residential growth in the 1990’s and early 2000’s with development primarily concentrated on lands to the north of the town centre. The proximity of the town to Drogheda in addition to its setting has made the town an attractive place to live*”. As such, the Draft Plan further states that, “*future development in Termonfeckin during this Plan period will focus on consolidation and the build out of extant permissions, with opportunities for infill and brownfield development close to the town centre.*”

Relevant policy objectives for the town of Termonfeckin include:

TER 1 – “*To consolidate and strengthen the commercial and residential town centre of Termonfeckin and encourage development, which will contribute to its character, reserve and enhance the quality of its attractive built and natural environment, while catering for the needs of all sections of the local community.*”

TER 4 – “*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.*”

Given the close proximity of the subject lands to the town centre of Termonfeckin, 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 Termonfeckin. 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 'L1 – Strategic Reserve' 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.”*

An Infrastructure Assessment and Land Use Evaluation has been included within Appendix 2 of the Draft Plan. This alignment of infrastructure requirements with land use evaluation provides a *“more coherent overview of the suitability of lands for development in each settlement”*. Our client's lands, which are subject to this rezoning submission, are identified as an Opportunity Site and included as part of the assessment (Fig. 5 below).

The criteria taken into consideration for the sites' assessments include: *“Proximity to town centre; Contribution to the delivery of consolidated, compact growth; Proximity shops/services; Proximity to schools; If the location of the lands will facilitate the delivery of infill or backland development; Availability of public transport; If there are any issues with flooding.”*

As seen in Fig. 5 below, our client's site is located within 'Site 4'. According to this matrix for assessment, the sites with the lower score are considered to be more optimal locations for development. In this regard, it can be argued that part of our client's lands (the northern portion) can be considered for 'A2 – New Residential' zoning designation as the lands share similarities between Site 1 and Site 2 (both of which are zoned for new residential development in the Draft Plan). When comparing the scores for Sites 1 and 2, our client's lands are closer in proximity to schools than the others, as well as closer to the bus stops within the town.

Whilst it is acknowledged that not all of Site 4 enjoys the same benefits as the lands owned by our client and subject to this rezoning submission, it is considered that our client's lands benefit of a more optimal location for residential development and thus should be considered for rezoning to 'A2 – New Residential', particularly the northern portion contained within the 500m ratio (Fig. 5). In light of this, it is recommended that Site 4 should be split into a northern and southern portion, with the northern portion (outlined in Fig. 5 below) rezoned to 'A2 – New Residential' and the southern portion remaining as 'L1-Strategic Reserve'.

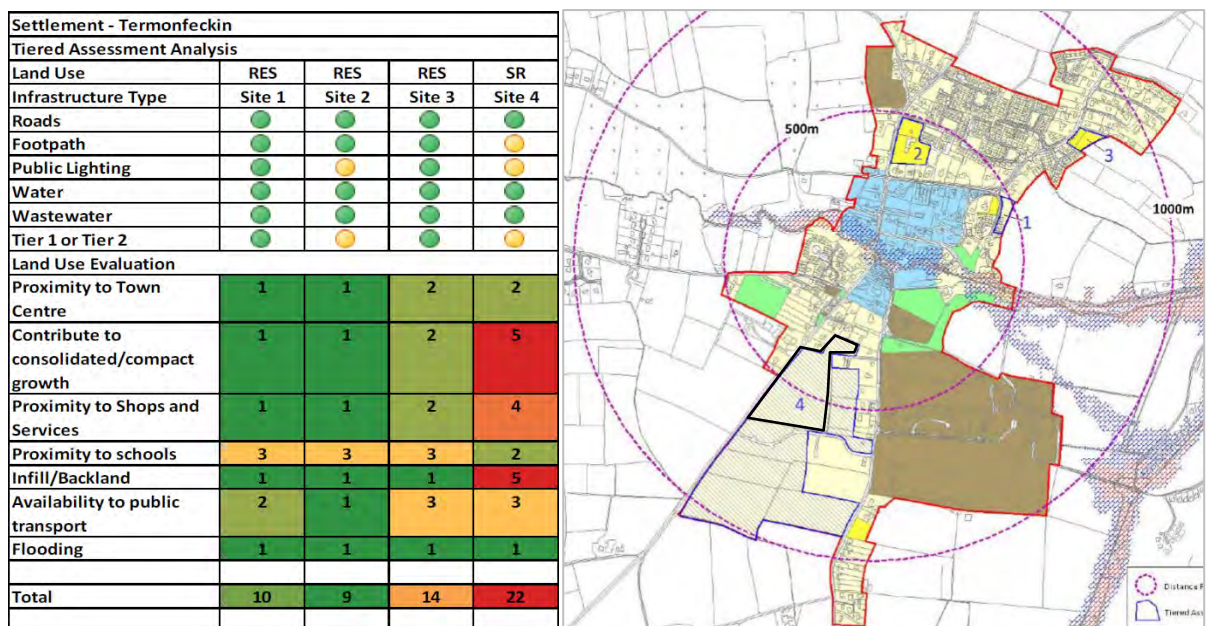


Fig. 5 – Termonfeckin Tiered Assessment Analysis and Map (subject site within Site 4 outlined in black)

6.2 Serviceability & Accessibility of the lands

In terms of available services and accessibility of the subject lands, the Draft Plan notes that Termonfeckin is served by the following water services infrastructure:

“Water: Water supply for Termonfeckin is supplied from the South Louth and East Meath Water Resource Zone. There was limited capacity available at the time of writing.

“Wastewater: Foul Water in Termonfeckin is treated in the Drogheda Waste Water Treatment Plant, which had available capacity at the time of writing.”

The subject lands can be therefore considered to be well-served and readily available to connect to the existing water infrastructure for the town of Termonfeckin. Furthermore, the site assessment contained within Appendix 2 of the Draft Plan confirms that there is no identified potential infrastructure required for development on the Opportunity Sites for the town (Fig. 6). The only potential infrastructure required to facilitate potential development of the lands relates to roads infrastructure and consists of footpath and public lighting over c.431m for Site 4 (which contains our client’s lands now subject to this rezoning submission).

Settlement – Termonfeckin		
Site	Potential infrastructure required to facilitate the development of the lands	
	Roads	Water Services
Site 1	None identified	None identified
Site 2	Potential additional public lighting of 195m over the length of the site	None identified
Site 3	None identified	None identified
Site 4	Footpath and public lighting over c.431m	None identified

Fig. 6 – Termonfeckin Tiered Assessment Analysis and Map (subject site within Site 4 outlined in black)

In addition to the above, the subject lands are highly accessible and enjoy excellent connectivity to the town centre and to Drogheda and surrounding towns. The subject lands are located along the R166, which links the town to Drogheda to the south-west and Clogherhead to the north. There are several bus services offered in the town, including Route 168 linking the town to Drogheda Bus Station and Dundalk Bus Station. As well as this, the Rural Transport Initiative runs a weekly service to Drogheda, further linking Termonfeckin to neighbouring towns.


It is important to note that it is an objective of the Council *“to support the progression of a road line to the south of the settlement between the Drogheda and Baltray Roads, which is to be achieved in conjunction with the development of residential lands.”*

Downey Planning are of the professional opinion that the subject lands represent well-serviced and highly connected lands which should be considered for rezoning in the Draft Louth County Development Plan 2021-2027 from ‘L1 – Strategic Reserve’ to ‘A2 – New Residential’.

6.3 Consolidation of the Built Environment of the area

Termonfeckin is identified as a Self-Sustaining Town in the Draft Louth County Development Plan 2021-2027. Population growth in these towns is envisioned to be at *“a rate that seeks to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision”*. These Self-Sustaining Towns, including Termonfeckin, have experienced residential expansion with varying levels of growth and investment in employment generating development and service provision. The Draft Plan acknowledges the above and further notes that the growth strategy for these towns *“will focus on driving investment in services, employment growth and infrastructure while balancing housing delivery, including consolidation of the core areas and delivery of compact growth.”*

As we strive to create more compact settlements and facilitate population growth in a consolidated urban environment, it is critical that such growth provides for the creation of sustainable, healthier neighbourhoods and communities. This can be achieved by: Connecting residential, employment, commercial and recreational areas with footpaths, cycle paths and public transport; Promoting wellbeing and an active lifestyle in the local community; Engagement with the local community and promoting sustainable practices such as energy and water conservation and waste reduction; Promoting social integration that supports the creation of mixed tenure communities where there is

an appropriate mix of housing to meet the needs of the entire community, and  Creating safe, accessible neighbourhoods that encourage more social interaction and outdoor activities.

This Draft Plan also seeks “to support the continued development of sustainable neighbourhoods and communities throughout the County”, as well as facilitating the creation of attractive and sustainable communities where there are strong links and connections to local services. Our client’s lands can be considered appropriate in this regard, noting the proximity of the site to public transportation and to the town centre.

In relation to Housing, it is an objective of the Council:

HOU 18 – *“To develop sustainable and successful neighbourhoods through the consolidation and redevelopment of built-up areas and promote new compact mixed-use urban and rural villages served by public transport and green infrastructure.”*

The subject lands are surrounded by existing residential developments, and indeed ‘A1 – Existing Residential’ land use zoning designation, and are within 500m of the centre of Termonfeckin. As such, Downey Planning are of the professional opinion that the development of the lands for housing purposes would support the consolidation and compact growth of Termonfeckin and provide modern housing, including social and/or affordable houses. Furthermore, the rezoning of our client’s lands from ‘L1 – Strategic Reserve’ to ‘A2 – New Residential’ will be in compliance with the relevant national, regional and local planning policies and objectives for the area and in accordance with the principles of proper planning and sustainable development of the area.

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.

Notwithstanding the above, there is an ambitious target of compact growth for urban areas within the existing built-up footprint of settlements with a requirement to deliver 30% of all new homes within these areas. The subject lands are located in close proximity to the town centre of Termonfeckin (c.500m) and surrounded by existing residential developments, noting the quantum of land zoned for new residential development (2.4 hectares) and the current demand for housing, it is considered that

our client's lands have the potential capacity to deliver new homes and support the compact and sustainable growth of the town in accordance with pertaining policies.

Downey Planning have estimated from a HNDA assessment that the available zoned lands within Termonfeckin would require to be built out completely within the lifetime of the Development Plan at a density of approximately 42 units per hectare in order to achieve the population growth projected for Termonfeckin. It is respectfully submitted that this level of development is not viable for the area as it would require apartments or duplexes to be constructed at a significant scale. This would add enormously to the 'build-cost' and ensure that lands would simply never be developed over the Plan period. Such densities are only achievable in the larger towns and cities but not in Termonfeckin and similarly sized towns. In this regard, a density of approximately 20-25 units would be considered more appropriate and viable in the area. This would require a greater quantum of land to be zoned and made available for development than is currently proposed under the Draft Plan.

As identified in both the existing and draft Development Plan, our client's site is zoned for 'Strategic Reserve', 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 'L1 – Strategic Reserve', this potential cannot be achieved on a site that is well-connected and readily available for development.

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 5.3 hectares of lands at Drogheda Road, Balfeddock, Termonfeckin, Co. Louth. These lands have been proposed to be zoned as 'L1 – Strategic Reserve' under the Draft Plan. However, our client is seeking to have their lands zoned as 'A2 – New Residential', in keeping with the granted permissions of the surrounding lands and overall zoning for the Termonfeckin area.

Our client owns approximately 5.3 hectares of lands at Drogheda Road, Balfeddock, Termonfeckin, Co. Louth. The lands owned by our client, and subject to this submission, have been proposed to be zoned as 'L1 – Strategic Reserve' under the Draft Louth County Development Plan 2021-2027. However, our client is seeking to have the subject lands zoned as 'A2 – New Residential', in keeping with the granted permissions of the surrounding lands and overall zoning for the area.

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:

- Should the lands be zoned as 'L1 – Strategic Reserve' 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 Termonfeckin.

- There is no identified potential infrastructure required for development on the subject lands, as confirmed by the assessment of Opportunity Sites for the town, with the only potential infrastructure required to facilitate potential development of the lands consisting of footpath and public lighting over c.431m. The subject lands represent well-serviced and highly connected lands should be considered for rezoning in the Draft Louth County Development Plan 2021-2027 from 'L1 – Strategic Reserve' to 'A2 – New Residential'.
- The matrix for site assessment indicates that the subject lands, particularly the northern portion of same, represent an optimal location for development given their proximity to town centre, the potential contribution to the delivery of a consolidated and compact town, the proximity to shops/services/schools, and the availability of public transport.
- The zoning of the subject lands, or the northern portion of same, 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.

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 'L1 – Strategic Reserve' to 'A2 – New Residential'.