

Submission for Mr.P.Callaghan

1.0 INTRODUCTION

Peter Callaghan is the owner of the land affected by the proposed material amendment ARD1 extending to c.4.7ha and is identified by a dashed red line on the map below. The subject lands have a planning history of approval for residential development under P.A. Ref. 06/1843 which was granted an extension of duration up to the 15th of April 2018. Unfortunately, the lands went into receivership and were not developed before the life of this planning permission expired. Mr. Peter Callaghan is now the sole owner of the subject lands and actively promoting these lands for residential development.

We note that a submission (Ref. LCDP DR00578) was made by Finn Design Partnership on behalf of Seamus Rogers in support of the residential zoning applied to the subject lands under the draft Louth County Council Plan 2021-2027. Mr. Rogers is a developer who has engaged with the landowner Mr. Peter Callaghan with a view to developing the subject lands for residential dwellings in the short term. Drawings have been prepared with the intention of lodging a planning application. Based on the draft plans included at Appendix A this site could provide c.99units while protecting the motte on site with an appropriate buffer area and providing c.13,000sq.m of public open space. It is submitted that this site offers an immediate response to housing need as identified for Ardee.

This submission seeks that the proposed material alteration to change the zoning order of priority from ‘Residential A2 – Phase 1’ to Residential A3 – Phase 2’ is not adopted and that the A2 – Phase 1 order of priority zoning as per the draft Plan is adopted.

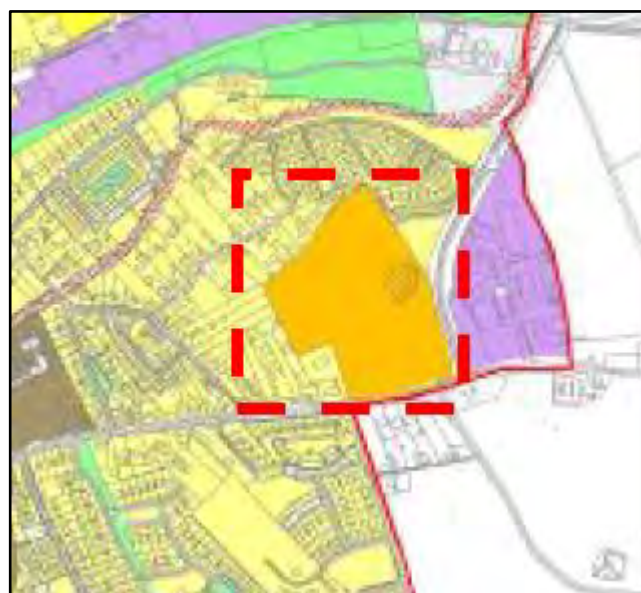


Figure 1: Extract from the Material Alterations to Maps – ARD1

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It is noted that the change sought will not add more residentially zoned land to the overall amount of residentially zoned land. Rather, the proposal seeks only a change to the order of priority for the release of residentially zoned lands. As such the proposal sought in this submission is in keeping with Section 12(10(c)) of the Planning and Development Act 2000 as amended as given the modification proposes a change to the order of priority of a residential zoning the change sought in this submission would be minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site or result in an increase in the area of land zoned for any purpose. The principle of the residential zoning having been established through the various Strategic Environmental Assessment (SEA) of the Plan-making process.

According to the table contained at page 6 of the Material Alterations to Maps section, alteration no. ARD1 relates to Submission number 071. Submission LCDP DR071 relates to a completely different site to the north of Ardee as identified below by figure 2. The Report of the Chief Executive on submission LCDP DR071 received on the draft plan states *“on foot of the submission from the OPR and EMRA, the lands are now identified as Phase 2 lands”* recommending a mapping change to identify submission LCDP DR07 lands as Phase 2 (p.330). It is apparent that the order of priority change should have applied to the lands affected by submission 071 which are the lands edged red in Figure 2 below and not to Mr. Callaghan’s lands.



Figure 2: Extract from Section 2: Chief Executive’s Summary, Response and Recommendation on Zoning Submissions (p.330) identifying lands associated with Submission LCDP DR07

2.0 HOUSING LAND SUPPLY IN ARDEE

It is apparent that the proposal in this material alteration as with many of the other material alterations that affect the order of priority for residentially zoned lands in the Ardee, that the conclusion has been reached by the Planning Authority following on from submissions from the Office of the Planning Regulator that there is too much land zoned for residential development in Ardee and that the solution is to change the order of priority.

It is strongly contended that the above approach fails to consider the supply side of the housing land supply availability equation and in particular the market element of the supply of land for residential development. On the face of it may be that it appears there is substantial amounts of land zoned for residential development in Ardee, but that does not mean that zoned land is ready and available for development. It may be the case that following from the Infrastructure Assessment and Land Use Evaluation (IALUE) for a site that it is considered 'available' from the point of view of services, but that still leaves two important elements missing from the assessment and those are whether the landowner is willing and able to bring the land forward for development and, is there demand if houses are built on the site and what is the likely annual sales. Without these assessments it is distinctly possible there is a very significant under-assessment of the actual availability of land for residential development in Ardee.

There is a very clear disconnect between what is perceived to be an over-supply of zoned housing land and the actual supply of new houses. It is submitted a key reason for this disconnect is that the IALUEs do not consider the supply side of the housing supply equation in terms of the actual availability of residentially zoned land and the market demand for annual sales in the event such land does come forward.

It is submitted the residential land zoning requirements needs to be reassessed following the publication of detailed national Guidance notes and at least until those are available, the order of priority strategy as contained in the material amendments whereby the subject lands are moved down the order of priority from A2 to A3 should not be adopted, existing residential zonings and the A2 order of priority as proposed in the draft Plan should be retained and a "plan – monitor – manage" system for residential development should instead be adopted. This level of flexibility is required at least until national policy becomes available. The rate of growth can then be controlled through review of actual housing starts and population growth rather than by a rudimentary 'dumbing – down' of the order of priority for residentially zoned lands.

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Of particular concern is there appears to be no assessment under the IALUE assessments with regard to the actual availability of sites that are assessed and/or the demand for housing on these sites in the event houses are built on them. Furthermore, there is no assessment as to likely annual sales rates. It is not clear if land agents or landowners were contacted and the degree of interaction that ensued. Such engagement is a fundamental input into a robust residential land allocation system. There is little point in allocating land for residential development if that land is unlikely to come forward for development and to simply assume the land will be brought forward for development because it is zoned is an incorrect assumption to make. In the absence of such knowledge and information a far higher level of flexibility is required and particularly that existing A2 zonings as contained in the draft Plan are not moved down the order of priority to A3.

The submission lands are available, serviceable and zoned for residential development in the draft Louth County Development Plan. The development of these lands would consolidate the existing urban area and offer a realistic contribution to the housing need identified for Ardee by the Core Strategy.

3.0 SUITABILITY OF SUBMISSION LANDS FOR RESIDENTIAL A2 – PHASE 1 ORDER OF PRIORITY ZONING

According to the Report of the Chief Executive of Louth County Council on the submissions received on the draft Louth County Development Plan 2021-2027,

“The development of the subject lands which is surrounded by existing residential and employment generating activities would facilitate infill development at this location and would support the implementation of the principles of sequential, compact and sustainable growth (p.347)”.

	
<p>Plate 1: Southern Boundary with R170 showing footpath and public lighting towards town centre</p>	<p>Plate 2: Eastern Boundary along Link Road to N33 with footpaths and public lighting</p>

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It is submitted it is appropriate to maintain the A2 –Phase 1 order of priority zoning as per the draft Plan for the following summarised reasons –

- The development of the submission lands would, without doubt represent sequential and compact growth and contribute to consolidation of the urban area of Ardee. These lands are contained within the urban footprint of Ardee and contiguous to existing residential development.
- The submission lands are within 1km of the town centre with full footpath connectivity. There is a primary school within 500m of the submission lands and Ardee Community School is just over 1km walking distance to the east. The primary school, Scoil Mhuire Na Trocaire, is to be extended to provide to additional 80m² classrooms and Ardee Community school is due to be substantially increased in capacity with 18no. general classrooms in addition to 4no. specialised classrooms to be provided under the Additional Accommodation Scheme 2021.
- The main bus route serving Ardee is within 1km of the application site at the junction of the N2 and R170.
- The development of the lands for residential purposes represents a clear, limited and defensible expansion of the urban area in a sequential manner given the lands are enveloped by existing housing and roads infrastructure in proximity to employment lands. The submission lands are essential an infill site.
- There are no infrastructural constraints identified on these lands by the IALUE prepared to inform the draft Development Plan in terms of roads, water supply or wastewater. The site is connected to the town centre by existing footpaths with public lighting in place and scores highly in terms of its proximity to community services including schools.
- The lands are not environmentally constrained with no Flood Zone affecting these lands.
- The lands are in the sole ownership of Peter Callaghan who is keen to move these lands forward for development at the earliest opportunity.

APPENDIX A

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