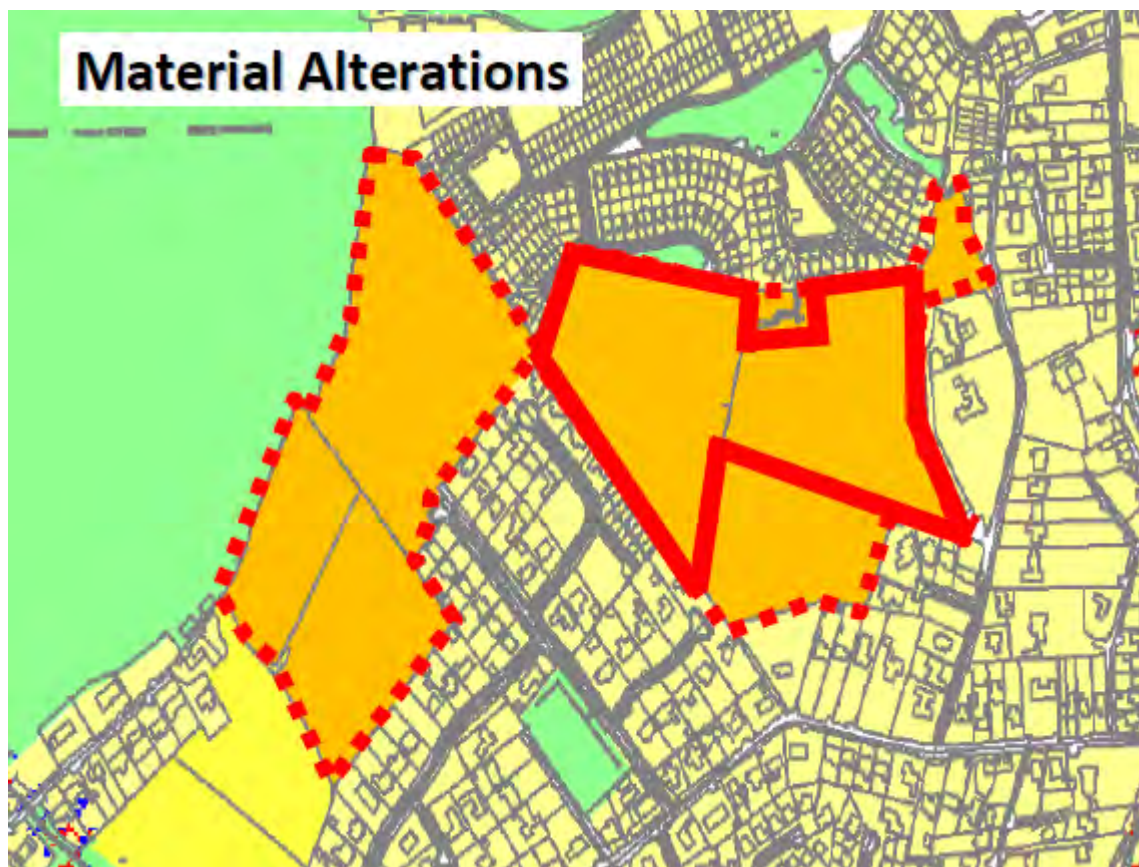


## **1.0 INTRODUCTION**

Shannon Homes (Blackrock) Ltd is the owner of a substantial portion of the land affected by the proposed material amendment DLK26. The Shannon Homes land ownership extends to c.5ha and is identified by a solid red line on the map below.

***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 order of priority zoning as per the draft Plan is adopted.***



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 Assessments (SEA) of the Plan-making process.

It is disconcerting that proposed material amendment DLK26 includes two different sites, each with different boundaries, in different ownerships, displaying different land-use characteristics and with different patterns of residential development surrounding them. Furthermore, matters such as access, connectivity, drainage, services and infrastructure differ between these sites. Elected members would need to be certain they can decide between the various sites in the event they want to change the order of priority residential zonings as it affects the Shannon Homes lands.

## **2.0 HOUSING LAND SUPPLY IN DUNDALK AND ENVIRONS**

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 Dundalk and Environs area, 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 the Dundalk and Environs area and that the solution is to either ‘dezone’ lands or 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, it may be that it appears there is substantial amounts of land zoned for residential development in the Dundalk area, but that does not mean that zoned land is ready and available for development. It may be the case that following from the IALUE for a site that it is considered ‘available’ from the point of view of services, but that still leaves at least 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 the Dundalk and Environs area.

As an example, taking all the proposed order of priority changes for Blackrock (sequence A2 to A3) there will only be two large sites affected by A2 order of priority. Both of these sites have planning permission and both of these are SHD permissions (Ref 303253 for c.166 dwellings on Old Golf Links Road and 304782 for c.480 dwellings south of Bothar Maol). There can be no guarantee that these sites will come forward and also even if they do come forward the annual completion rate of dwellings in these developments has not been assessed.

***Shannon Homes has a strong track record of building houses in the Blackrock area, having developed the very successful Blackrock Cove housing development. With this record, it is evident that, should the submission lands maintain its Residential 2 – Phase 1 order of priority, the lands will be brought forward for development quickly. There are 50 people employed on the Blackrock Cove development and these employees would be moved to the new development as proposed on the submission lands.***

There is a well-recognised shortfall in housing for existing and new employees in the Dundalk area. This matter is regularly raised by existing employers and by potential new employers and is having a negative impact on the ability of employers, existing and new, to recruit new employees. This situation will be accentuated with WuXi coming on stream and with new firms locating to the area as a result of Brexit, and yet these proposed material amendments propose to remove large tracts of land from the Phase 1 Order of priority including the submission lands, only serving to further constrict housing supply. Such an approach severely undermines the ability of Dundalk to grow to a population of at least 50,000 as per the Regional Spatial and Economic Strategy (RSES).

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 that 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 that in the absence of national guidance on preparing development plans and on the preparation of housing strategies and Housing Needs Demand Assessments that a very high degree of flexibility needs to be contained in terms of housing provision in the Development Plan especially for a Regional Growth Centre such as Dundalk.

The draft Plan relies heavily on a major contribution to housing supply from ‘brownfield sites’ and from a large Phase 1 zoning on the west side of Mount Avenue. There is no strong evidence base to support either the assumptions regarding the contribution from infill sites or the yield from these sites or for that matter any housing market factors. Similarly, we believe the lands west of Mount Avenue require extensive up-front infrastructure and there is not a strong housing demand in this area of Dundalk.

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. Until clear national policy is in place, the rate of growth can 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.

Of particular concern is that 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. This 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.

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

It is submitted that 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 is a natural and sensible southerly extension of the Blackrock Cove development to the north which was developed by Shannon Homes.
- Shannon Homes has a strong track record of delivering housing in the Blackrock area, having built the very successful Blackrock Cove development to the north of the submission lands.
- There are 50 people employed on the Blackrock Cove development and these would be moved to the development on the submission lands. This level of employment represents a significant injection of money into the local economy.
- The development of the submission lands would, without doubt, represent sequential and compact growth and contribute to consolidation of the urban area of Blackrock. Blackrock, whilst part of the Louth Plan review, has a distinct housing market from the Dundalk town area. This needs to be considered in the zoning of land for new residential development.
- The lands are enveloped by permitted and existing residential developments to the south-west, north-east and south-east including SHD permission 303253 for c.166 dwellings and by Dundalk Golf Club to the north-west. As such, 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 permitted and existing housing.
- The lands are just over 1km from Blackrock seafront via Rock Road and Sandy Lane. They are within 1km of St. Francis National School and within 600 metres of Blackrock Community Centre and Blackrock Park and the associated amenities of Rock Celtic.
- There are footpaths and public lighting the whole way from the site to Blackrock Village centre.
- The lands are not environmentally constrained.
- The lands have very well defined physical boundaries and would in reality represent a sensible, self-contained and limited development rounding off the Blackrock urban area. The golf club lands represent a strong and visible limit to the north-westerly expansion of the Blackrock urban area.
- The lands can be serviced and safe access can be provided.

- The lands are in the sole control of Shannon Homes who has a very strong track record of delivery of residential developments, including the Blackrock Cove development to the north of the submission lands. Shannon Homes is keen to move these lands forward for development at the earliest opportunity and if the proposed material amendment to alter the order of priority from A2 to A3 is adopted it will have a severe negative impact on the development of the site and the provision of new houses.