

## **1.0 INTRODUCTION**

This submission supports the proposed material alteration to change the zoning of the lands from L1 Strategic Reserve to Residential under the proposed material alteration DLK3. **Given there is an extant planning permission on the lands (P.A. Ref. No. 18/1060 & 18/1061) , it is submitted the entire lands would be more appropriately zoned Residential A2 – Phase 1 and my clients seeks that change.**

It is noted that the change proposed in this submission will not add more residentially zoned land to the overall amount of residentially zoned land and as such is in keeping with Section 12(10(c)) of the Planning and Development Act 2000 (as amended). Given the modification proposes a modification 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 though the various Strategic Environmental Assessment (SEA) of the Plan-making process.

This submission seeks a change to the order of priority for the release of the lands for residential development as opposed to a change in the zoning that is proposed under material alteration DLK3.

My Client has concerns about an article published in the Argus dated 25<sup>th</sup> of May which reported there appears to be have been significant confusion amongst the Councillors in relation to the fact there was an extant planning permission on the lands. The article references an admission by the Chief Executive that this material fact was overlooked when the original draft of the plan was drawn up and circulated. The Councillors should have been explicitly advised at the time of the original draft that there was an extant planning permission in place. It would be normal practice that lands that have planning permission granted under a previous development plan would retain a zoning status that is in keeping with and not in conflict an extant planning permission.

During the public consultation stage of the Draft Plan, a submission was made to the Forward Planning unit of Louth County Council on the 16<sup>th</sup> of December in relation to the Lands on the Armagh Road.

## **2.0 JUSTIFICATION – CHANGE ORDER OF PRIORITY FOR A PORTION OF LANDS PROPOSED FOR ‘RESIDENTIAL A3 – PHASE 2’ to ‘RESIDENTIAL A2 –PHASE 1’**

As noted, in the proposed material alterations to the draft of the development plan the lands have been rezoned from L1 strategic land reserve to a small portion (13%) zoned ‘Residential - A2 Phase 1’ and the balance (83%) zoned ‘Residential A3 Phase 2’. It is also noted that whilst my clients support this alteration to the residential zoning, they seek for the area of the site affected in the material alteration with proposed ‘Residential A3 – Phase 2’ zoning would be better under zoning category ‘Residential A2 – Phase 1’. This is the case for the following summarised reasons -

- The lands have a planning permission grant for 582 residential units, recreation & amenity space (including a 4 acre public park), a site for a crèche, a village centre, and a school (3 acres reserved site) which all form part of master plan that was drawn up in conjunction with the Council (as per attached map).
- Given there is an extant planning in place we are of the view that all the lands should have been zoned A2 Phase 1 in the initial draft of the plan to avoid an inherent conflict between the underlying zoning, the extant planning permission and the proposed development my Client plans to carry out on the site during the life of the 2021-2027 plan.
- In order ensure the implementation of the development in line master plan that was developed in conjunction with the Council my Client respectfully requests all the subject lands are rezoned to category A2 Phase 1.
- In terms of the build out status, the site is “shovel ready” and ready to go. My client is engaged with a housebuilder that has a strong and demonstratable track record in building out large-scale residential schemes of this nature who is keen to commence building over the next few months.
- The development will be a mix of both private and public housing. Engagement with the housing associations has already taken place with a view to providing them with a significant portion of new homes to serve the public housing needs.
- The current planning is set to lapse in November 2024 leaving less than three and a half years from going on site. Even if 70/80 dwellings were constructed and sold every year it would take 7/8 years to successfully complete the entire scheme as per the agreed master plan.
- As put forward in the proposed material alteration, the A3 zoning which is being proposed on 83% of the lands inhibits the ability to complete out the scheme as per the master plan and effectively risks the development and master plan for the lands “hung” when the current planning lapses in November 2024, due to the inability to submit new or revised planning applications or seek a planning extension.
- In a scheme of this scale it would be normal for minor modifications to take place during the build out phase that would require planning submissions to effect these changes e.g. an amend to a house type however this might not be possible on those parts of the lands affected by the A3 zoning
- In addition the majority of the community facilities are located on the part of the site proposed to be zoned A3 which risks their development and delivery. These are a critical element of the overall master plan.
- The proposed A3 zoning significantly shortens the potential timeframe to deliver the holistic development and has caused serious complications for my Client in partnering with a housebuilder to develop out the scheme which is putting the delivery of the entire development in at risk.

**CONCLUSIONS**

Given this back drop we have made a submission to the Council as part of the consultation process. We have formally and respectively asked that our lands that i) form part of a master plan; ii) have planning permission iii.) are ready to go should retain their residential zoning status as proposed under the material amendments but that the order of priority is amended such that the entire landholding (not just 13%) is affected by order of priority 'Residential A2 – Phase 1' in the new Development Plan.

