Dear Frank,

RE: SUBMISSION TO THE ISSUES PAPER OF THE OF THE LOUTH COUNTY DEVELOPMENT PLAN 2021-2027 ON BEHALF ON RICHMOND HOMES

1. Introduction

1.1 On behalf of our client, Richmond Homes, Embassy House, Ballsbridge, Dublin 4, we wish to make a submission in respect of the Louth County Development Plan Review and in response to the Public Consultation & Strategic Issues Paper published on 27th September 2019.

1.2 We welcome the opportunity to submit an observation on the Issues Paper and wish to outline the strategic approach and commitment of Richmond Homes to the creation of sustainable communities in Louth in accordance with national, regional and local planning policy for the county.

1.3 Our client is currently on site at Bridgegate, Ardee; where a development of 159 no. residential units, crèche, community building and public open space in the form of a Public Park of c. 4.91ha is under construction and nearing completion (in the initial phases). This development has introduced improved infrastructure facilities which can enable the future sustainable growth of Ardee.

2. Population & Housing Growth

2.1 It is acknowledged that the Strategic Issues Paper does not identify population or housing targets for the County. However, it is important that existing trends are considered when identifying lands for future development.

2.2 Taking Ardee as an example, the actual population at 2016 Census was greater than that of the projected population level set out in the Core Strategy of the extant Louth County Development Plan 2010-2016.
County Development Plan 2015-2021, with population growth only 42 persons short of the projected figure of 4,970 in 2021.

2.3 It is expected that as a Moderate Sustainable Growth Town in the extant CDP, with infrastructure improvements identified at the N52 Ardee bypass and the N2 Ardee to Castleblaney set out in the RSES, Ardee is well placed to accommodate population growth and proportionate housing growth in accordance the Core Strategy of the emerging County Development Plan.

2.4 A Socio-Economic and Housing Supply Assessment undertaken by Future Analytics on behalf of Richmond Homes in May 2019, projects the population of Ardee to grow by approximately 11% to 5,541 in the period 2016 to 2026.

2.5 This Cohort Component Model methodology is based on current trends in age specific levels, changes in fertility, mortality and migration over time and is noted to be substantially greater that the rate of growth projected by the CDP Core Strategy in the 5 year period between 2016 and 2021.

2.6 The Planning Authority should be aware of the population growth exceeding the Core Strategy projections in Ardee to 2016 and the future growth to 2026 projected by the Future Analytics assessment. This growth rate is likely to be facilitated in part by the infrastructure improvements set out by the RSES.

2.7 Furthermore, there is a need to provide for significant additional housing in the county to meet this existing housing deficit in addition to providing for higher levels of existing population growth going forward, by reference to the most recent CSO data.

3. Future Sustainable Development of Ardee

3.1 It is essential that future land allocations for residential growth identifies a sufficient number of sites at appropriate locations in order to achieve housing growth targets as set out by the emerging Core Strategy of the Louth CDP.

3.2 In identifying zoned housing lands, the Planning Authority should have regard to National Policy Objective 72a which states ‘planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that that is serviced and ii) zoned land that is serviceable within the life of the plan’. This is set out in Appendix B of the NPF and prioritises serviced lands which is sequential to existing residential uses.

3.3 This approach is consolidated by the RSES which notes that ‘in planning for future growth, it will be important for planning authorities to set out and monitor the service capacity and likely rate of completion of development on zoned lands’. This will include performance measures such as service capacity, patterns of housing delivery, sequential development of the town, and output and the take-up and completion of planning permissions. The recent upgrade of the wastewater treatment plant and water supply to the area has enabled the progress of the phased development of Bridgegate.

3.4 A recent review of zoned residential lands in Ardee notes a shortfall in delivery of meaningful development in the town, with 2 no. sites current under construction, at Bridgegate (by Richmond Homes), Rathgory and Castleguard Manor. A further 5 no. sites have planning permission granted however these are small scale in nature or have not commenced construction, and unlikely to contribute to the confirmed need for additional housing commensurate with Ardee’s designation as a Moderate Sustainable Growth town.
3.5 Following the completion of the 2 no. sites identified above, there is a notable deficit in the development pipeline, with no planning permission currently granted at Phase 2 lands. It is therefore vital that the Planning Authority seek to identify future residential land which is likely to come forward for development within the plan period in order to accommodate the projected 11% increase in population to 2026, and to provide for a compact, sustainable form of residential development for the town.

3.6 In this regard, the Planning Authority should seek to assess the viability of current zonings and the associated cost in servicing these sites in accordance with National Policy Objective 72b in terms of infrastructure.

3.7 Development should be prioritised on serviced sites in proximity to educational and community facilities to ensure the proper planning and sustainable development, particularly in the case of adjoining interdependent landholdings.

4. **Summary & Conclusion**

4.1 It is reiterated that Richmond Homes is committed to further appropriate and high quality residential development in County Louth which will contribute to the sustainable growth of the area in accordance with national and regional policy.

4.2 Our client's landholding within Ardee equates to circa 27 hectares of zone lands which has the potential to contribute to approximately 810 no. units to the development of the town in the long term, when calculated at an average of 30 units per hectare which is considered achievable on the lands.

4.3 Richmond Homes is currently on site at Bridgegate, Ardee, implementing a residential development with a large public park, crèche and community building in accordance with the Ardee Local Area Plan. This illustrates a willingness of Richmond Homes to secure planning permission for, and deliver, vital elements of infrastructure and servicing which contribute to the sustainable growth of Ardee.

4.4 We respectfully request that the emerging Core Strategy takes cognisance of recent and projected population growth trends in Ardee and assigns adequately housing growth targets to align with these.

4.5 It is important that the new County Plan for Louth recognises the substantial public investment in infrastructure such as the WWTP and also the private investment in the town such as the public park and community, and acknowledge that there is scope for providing for additional future sustainable communities in Ardee.

Yours sincerely,

John Spain Associates