

Anne Glancy

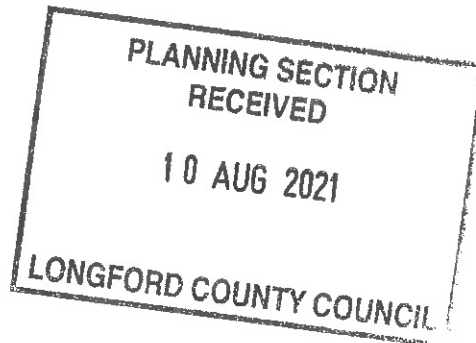
From: John J. McCarthy <~~john.mccarthy@img.ie~~>
Sent: Tuesday 10 August 2021 14:00
To: cdp
Cc: ian@imgplanning.ie
Subject: EXTERNAL - Submission re Proposed Material Alteration reference number AP.1C.13, Edgeworthstown, Co. Longford
Attachments: Submission to LCC Material Alterations to CDP2021-2027 10.08.2021.pdf
Importance: High
Categories: Red Category

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Hi,
Please see attached submission from IMG Planning on behalf of myself John McCarthy re Proposed Material Alteration reference number AP.1C.13, regarding lands at Edgeworthstown, Co. Longford.
You will note the first page of the PDF is the "separate page" required to comply with the Data Protection Act.
I would be grateful if you could acknowledge receipt of this submission.

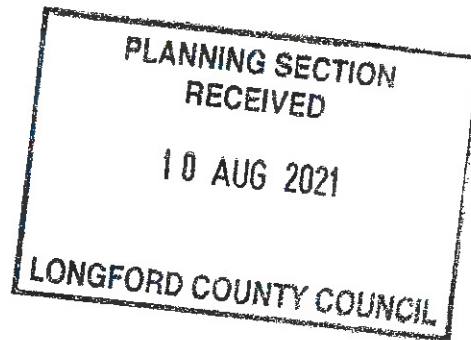
Look forward to hearing from you at your earliest convenience,

Many thanks,
Kind regards,
John
John McCarthy
~~0878382402~~





Administrative Officer
Draft County Development Plan
Forward Planning Unit
Longford County Council
Áras An Chontae
Great Water Street
Longford
N39 NH56



10 August 2021
By email: cdp@longfordcoco.ie

Dear Sir/Madam

Re: Submission to Longford County Development Plan 2021-2027 regarding Material Amendment to Zoning of "Land Parcel 4" at Bloomfield Park, Bracklin Road, Edgeworthstown, Co. Longford.

"Submissions must include the full name and address of the person(s) making the submission and where relevant, the body or organisation represented. This should be on a separate page to the content of your submission in order to assist Longford County Council in complying with the provisions of the Data Protection Act, as submissions are legally required to be published online."

This page is the "separate page" required to comply with the Data Protection Act.

We wish to make a submission to the Public Consultation process for Stage 4: Material Alterations to Draft Longford County Development Plan 2021 – 2027 on behalf of our client, John J. McCarthy of 128 Ranelagh Village, Dublin 6, D06V4Y8, owner of Folio LD13973F, which land is the subject matter of this submission.

This submission specifically relates to proposed Material Alteration reference number **AP.1C.13**, which proposes to change the zoning of a 3.2 hectare part of Folio LD13973F (referred to as "**Land Parcel 4**" in the proposed Zoning Maps used by the Council) from its present "Residential" zoning to "No Zoning".

Townland:	Edgeworthstown
Folio Number:	Part of LD13973F
Gross Area:	3.2 ha (Land Parcel 4)
Current Zoning per County Development Plan 2015-2021:	"Residential"
Proposed Stage 4 Material Amendment in LCDP21-27 to Land Parcel 4:	"No Zoning"
Request to Change to:	"New Residential"

Ian McGrandles MIPI, MRTPI
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Administrative Officer
Draft County Development Plan
Forward Planning Unit
Longford County Council
Áras An Chontae
Great Water Street
Longford
N39 NH56

10 August 2021
(by email: cdp@longfordcoco.ie)

Dear Sir/Madam

Submission to Longford County Council regarding Material Amendment in the draft of the Longford County Development Plan 2021-2027 to Zoning of "Land Parcel 4" at Bloomfield Park, Bracklin Road, Edgeworthstown, Co. Longford

The submission specifically relates to proposed Material Amendment reference number **AP.1C.13**, which proposes to change the zoning of a 3.2 hectare part of Folio LD13973F (referred to as "**Land Parcel 4**" in the proposed Zoning Maps used by the Council) from its present "Residential" zoning status to "No Zoning" status in the Longford County Development Plan 2021 – 2027.

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This submissions sets out the following four grounds to support the retention of the current “Residential” Zoning on “Land Parcel 4” in the Longford County Development Plan 2021-2027:

The 6.3 ha of land in Edgeworthstown (outlined in pink below), known as **Bloomfield Park**, is presently zoned “Residential” – over half of the site (3.2 ha) comprises “**Land Parcel 4**” (shaded blue below).

“**Land Parcel 4**” has been identified for de-zoning from “Residential” to “No zoning” via a Material Amendment of the Draft County Development Plan 2021-2027.

There are a number of reasons why it is respectfully requested that the proposed Material Amendment to the zoning that applies to “**Land Parcel 4**” should not be made and that the current “Residential” Zoning should be retained – these are summarised below.

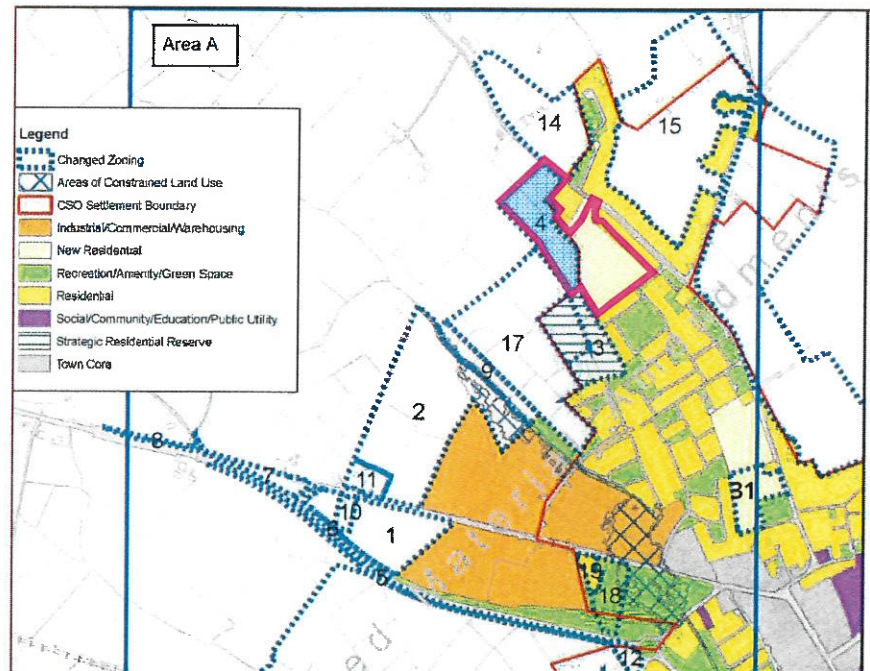


Figure 1 – Latest Proposed Zoning Map in Draft LCDP21-27

- A. There is a precedent of planning permission being granted on the Bloomfield Park lands (inclusive of “Land Parcel 4”) – **An Bord Pleanála previously granted planning permission for 81 houses** on the lands that **expired in 2017** [ABP Ref 218458 (78 houses) and ABP Ref 231422 (3 additional houses)].
- B. All of the 6.3 ha. Bloomfield Park lands, including “Land Parcel 4”, is suitable for “Potential Development” as per the Longford County Council’s Infrastructural Assessment Report (IAR) – the lands can be accessed safely through a single entrance off Bracklin Park Link Road; there are service connections already installed within the site; Irish Water has confirmed feasibility for all connections (water and foul); there is no flood risk; and the IAR ranks the land the most appropriate lands in

Edgeworthstown for development. "Land Parcel 4" lands are "Tier 1" Serviced Lands as per the National Planning Framework definition.

- C. The proposed "de-zoning" relies on the insertion of the exact route of the CSO Settlement Boundary Line, which has resulted in the hiving off and de-zoning of the 3.2 ha at "Land Parcel 4" from the 6.3 ha at the Bloomfield Park site. However, this approach has not allowed for the additional 100 metres 'cushion' provided for in the definition of the CSO Settlement Boundary Line, which, if applied correctly, means that "Land Parcel 4" should in fact be deemed to be within the CSO Settlement Boundary line and accordingly, it should continue to be zoned "Residential" in the next County Development Plan as per National and Regional Planning Objectives. The Flood Risk Map used by the County Council appears to include "Land Parcel 4" within the "Settlement Boundary" of Edgeworthstown, which further supports the assertion that "Land Parcel 4" is within the CSO Settlement Boundary. The Regional Planning Objective 3.2 also permits the new housing targets to be in locations "contiguous to" urban areas, such as "Land Parcel 4".
- D. The total quantity of proposed Residential Zoned land in Edgeworthstown per the amended Core Strategy of the Development Plan is 7.1 ha. Of the 7.1 ha, 3.8 ha (53%) are other lands located in a separate site on the Bracklin Road, circa 400 metres southeast of the 6.3 ha site at Bloomfield Park. This 3.8 ha site has a negative planning history and is impacted by a number of wayleaves in favour of the County Council and ESB Networks. These wayleaves have and will inhibit the development potential of the lands. The last planning application on the lands was made in 2006 and was refused by An Bord Pleanála primarily for this reason and there have been no further attempts to obtain planning permission since. The County Council acknowledged this fact at the SHD Tripartite meeting with An Bord Pleanála in February 2020 in regard to a proposed application for residential on Bloomfield Park under the Strategic Housing Development legislation. Approx 1.5 ha of the 3.8 ha site, or 40% of the site, represented by Land Parcel 31 in Figure 1 above and referred to as "R3" in the Council's Infrastructural Assessment Report, was provided with the most inferior infrastructure score for **residentially zoned land** in Edgeworthstown (see Figure 7 & Table 2 below). This Land Parcel 31 was proposed to be re-zoned from "Residential" to "Strategic Residential Reserve" in the initial draft of the LCDP21-27; however this initial proposal has now been reversed in the most recent Draft of the LCDP21-27, subsequent to the OPR submissions received (See text highlighted blue in Figure 4 below). The negative planning history of this 3.8 ha site is not comparable to the positive planning history on the 6.3 ha at Bloomfield Park, as planning permission for 81 houses on the Bloomfield Park lands has previously been granted by An Bord Pleanála, which expired in 2017. The lands at Bloomfield Park (inclusive of "Land Parcel 4") are currently the subject of a proposed Strategic Housing Development proposal, following a SHD Tripartite meeting with the County Council and An Bord Pleanála in February 2020. The SHD application is well advanced and is expected to be lodged in the coming month. The Board are unable to materially contravene on matters related to zoning under the SHD legislation and accordingly, the SHD will no longer be possible if "Land Parcel 4" does not retain its residential zoning. If the "Residential" zoning is retained on "Land Parcel 4", the 6.3 ha at Bloomfield Park could deliver 152 residential units (6.3 ha x 25 uph) of the target of 162 house units identified for Edgeworthstown in the Core Strategy for the next Development Plan period to 2027. This would enable the County Council to meet its statutory obligation to ensure that sufficient residentially

zoned land is provided and will also ensure that the County Council will avoid an unplanned material contravention in order to meet housing supply target of 162 units within the next Development Plan period to 2027.

2. Zoning and Planning History of “Land Parcel 4”

2.1 Current Position – Longford County Development Plan 2015-2021

The 6.3 ha of lands are collectively known as “Bloomfield Park” and are outlined in pink in the extract of the current Zoning Map in Figure 2 below. The entire of the 6.3 ha is currently zoned “Residential” under the current Longford County Development Plan 2015 – 2021.

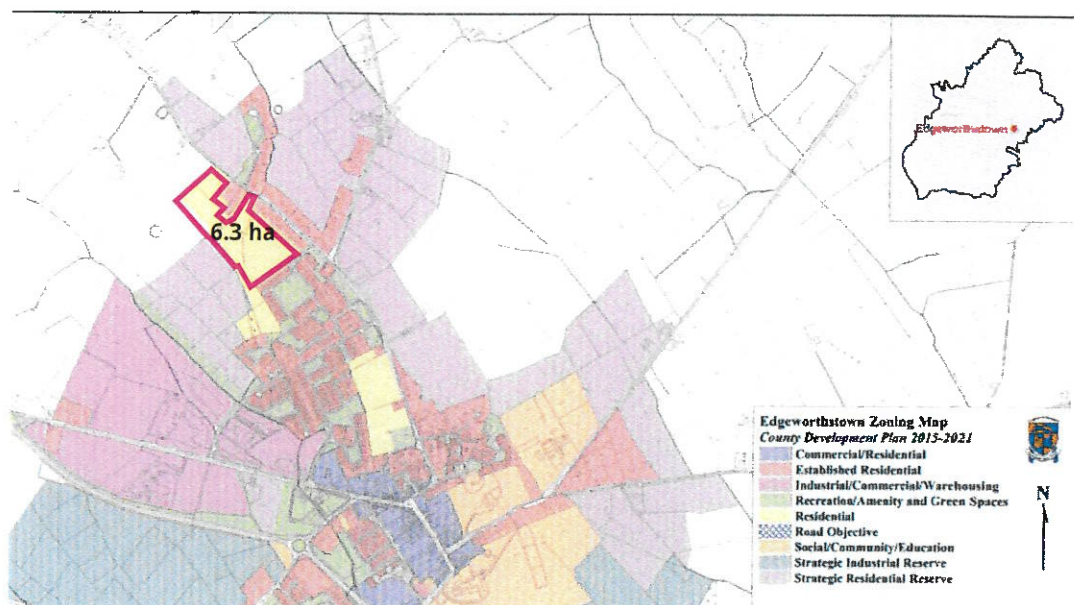


Figure 2 – 6.3 ha Bloomfield Park on current Zoning Map: Longford CDP 2015 – 2021

2.2 Proposed Position – Draft Longford County Development Plan 2021 – 2027

The “Residential” zoning was initially proposed to be retained on all of the 6.3 ha lands at Bloomfield Park in the Draft Longford County Development Plan 2021 – 2027; however subsequent to the OPR submission received, the County Council is now proposing a Material Amendment that will change the zoning of “Land Parcel 4” from “Residential” to “No Zoning”. “Land Parcel 4” is shaded blue in the extract of the proposed Zoning Map for LCDP 2021 – 2027) in Figure 3 overleaf.

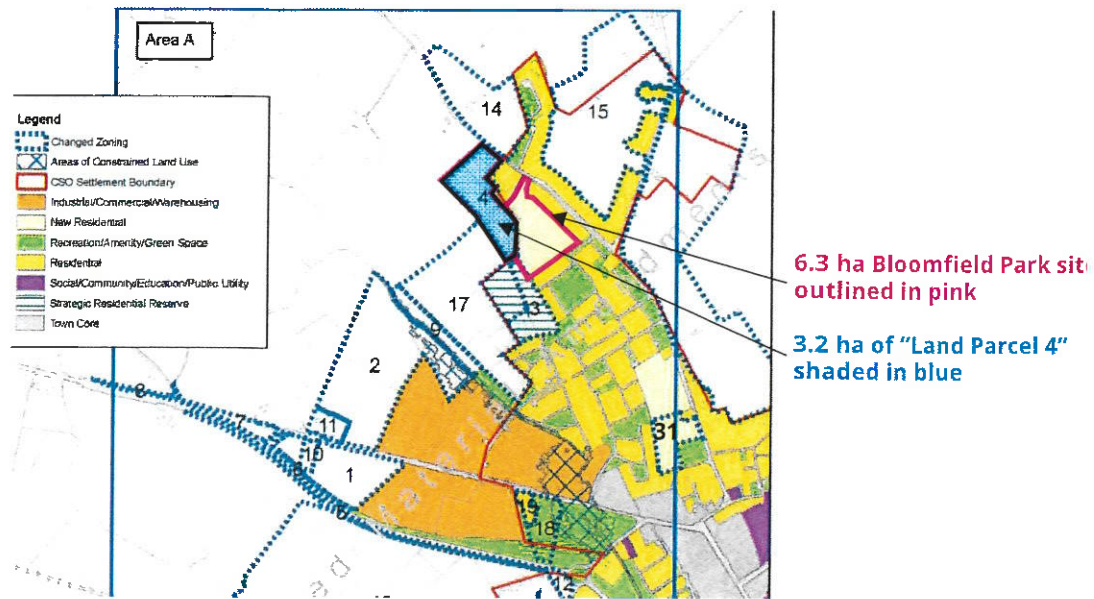


Figure 3 – 6.3 ha Bloomfield Park on Zoning Map: Proposed Material Alterations Draft Longford CDP21-27

“Land Parcel 4” is circa 3.2 ha. in size and consists of the north western part of the 6.3 ha. of Bloomfield Park. The proposed removal of “Residential” zoning on “Land Parcel 4” would represent a reduction of just over half (51%) of the 6.3 ha of residentially zoned lands at Bloomfield Park.

2.3 Planning History of the 6.3 ha at Bloomfield Park (inclusive of “Land Parcel 4”)

Over the last 17 years, there have been a number of attempts to obtain planning permission for housing on the 6.3 ha of lands at Bloomfield Park (which include “Land Parcel 4”). Planning permission has previously been granted for 81 houses on the lands, with the most recent permission expiring in 2017. The history is briefly summarised in Table 1 below.

Year	Ref	Permission For	Decision
2005	04/679 PL14.211024	105 Houses	Granted by LCC, Refused by ABP
2005	04/1201 No ABP Ref	12 Inch Foul Sewer Pipe	Granted by LCC
2005	05/558 PL14.218458	78 Houses	Granted by LCC, Granted by ABP
2009	08/454 PL.231422	3 Additional Houses to 78 (Total 81)	Granted by LCC, Granted by ABP
2011	11/106 No ABP Ref	5 year Extension to 78 Units	Granted by LCC
2013	13/179 PL.243139	64 Houses	Granted by LCC, Refused by ABP

Table 1 – Bloomfield Park Planning History

2.4 Longford County Council’s reasons for the proposed Material Amendment to change the zoning of “Land Parcel 4” zoning from “Residential” to “No Zoning”

It would appear that the proposal to change the zoning of “Land Parcel 4” above from “Residential” to “No Zoning” stems from a Recommendation from the Office of the Planning Regulator (OPR), namely OPR Recommendation No. 7 as set out in pages 27 and 28 of the Chief Executive’s Report: Part 1, dated March 2021):

OPR Recommendation No. 7:

"The OPR recognises that the Core Strategy Table (Table 4.12) in the Draft Plan individually allocates 30% of future housing requirements within the top four tiers to land within the existing built up footprint in accordance with NPO 3c and RPO 3.2. However, further details in terms of the identification and quantum of brownfield/infill lands to contribute to the policy requirements of NPO 3c and RPO 3.2 is deemed necessary. To this end, the OPR recommends that the Planning Authority:

- a) *Define those areas of settlements which will contribute to the cumulative delivery of 30% of all new homes within the built-up footprint of existing settlements" (emphasis added)*

Paragraph 4.6.2, page 29 of the Longford County Council Chief Executive Report: Part 1, dated March 2021 contains the Chief Executive's response to the above OPR Recommendation:

"The recommended revised zoning maps (as provided for in Appendix 8 of this report) include the CSO defined urban settlement boundary, which defines development within this boundary as brownfield and development outside of the boundary as greenfield.

This will be applied on the zoning maps for those settlements that are subject to this CSO Settlement definition, namely a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it, of 100 metres, and where there was evidence of an urban centre (shop, school etc) and in accordance with UN criteria as referred to in Reference 17 of Appendix 4 of the NPF."

References are made above to NPO 3c and RPO 3.2, which are:-

National Policy Objective (NPO) 3c (from the National Planning Framework Project Ireland 2040)

"Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints (19-Individual or scheme homes delivered outside the CSO defined urban settlement boundary are classed as greenfield)."

Regional Policy Objective (RPO) 3.2 (from the Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031)

"Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within, or contiguous to, the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas."

The above OPR Recommendation and the Chief Executive's Response has resulted in Proposed Amendment AP.1C.13 (extract in Figure 4 below) whereby the zoning of "Land Parcel 4" is proposed to be changed from "Residential" to "No Zoning".

Proposed Amendment AP.1C.13

Amend the Land Use Zoning map of the Draft Plan to take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR) to reflect the recommended changes to the quantum of residential zoned lands for each settlement incorporated by recommended amendments to the Settlement Hierarchy, the projected population and housing supply targets and residential densities for settlements and settlements tiers where relevant.

See Edgeworthstown: Proposed Material Amendment Map - Area A:

Residential Related:

Land parcel no. 3 – ‘Strategic Residential Reserve’;

Land parcel no. 19 ‘Residential’;

Land parcel no. 4, 10, 11, 14, 15, 16, 17, 19 – no zoning.

Other Uses:

Land parcel no. 18 - ‘Recreational / Amenity / Green Space’;

Land parcel no. 5, 6, 7, 8, 9, 12 – no zoning;

Land parcel no. 33 – ‘Social / Community / Education / Public Utility’.

See Edgeworthstown: Proposed Material Amendment Map - Area B:

Residential Related:

Land parcel no. 23, 27, 29 - no zoning;

Land parcel no. 28, 30, 34, 35 – ‘Residential’;

Land parcel no. 31 – ‘New Residential’;

Land parcel no. 26 – ‘Social / Community / Education / Public Utility’ and no zoning.

Other Uses:

Land parcel no. 20, 21, 22, 24, 32 – no zoning.

Figure 4 – Proposed Amendment AP.1C.13

3. Grounds for Justifying Retention of “Land Parcel 4” as “Residential” Zoning

There are a number of reasons why the proposed amendment to the zoning that applies to “Land Parcel 4” should not be made and that the current “Residential” Zoning should be retained.

3.1 Reason A

There is a precedent for planning permission being granted on “Land Parcel 4” – the lands were part of a housing development of 81 houses, which expired in 2017 [ABP Ref 218458 (78 houses) and ABP Ref 231422 (3 additional houses)]. The fact that permission was granted previously is confirmation that the lands are suitable for residential development.

The site layout plan that formed the basis of the permissions that granted is included in Figure 5 overleaf, with “Land Parcel 4” outlined in blue, which contained 42 out the 81 houses that were granted permission by An Bord Pleanála.

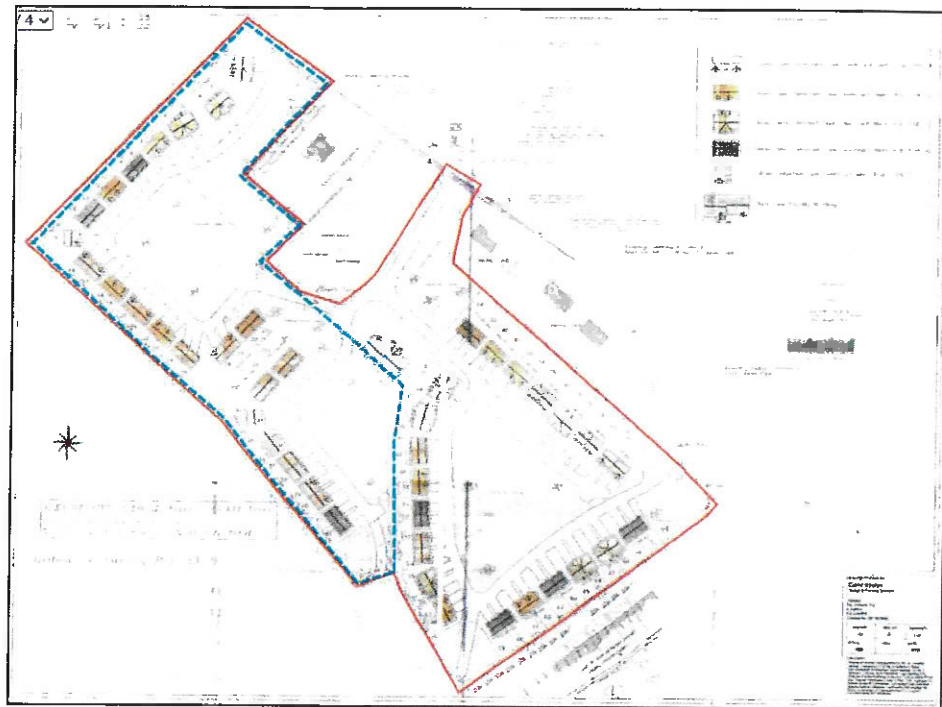


Figure 5 – “Land Parcel 4” outlined on basis plan of previous planning permission granted

3.2 Reason B

All of “Land Parcel 4” is deemed suitable for “Potential Development” in the County Council’s Infrastructural Assessment Report (IAR), due to the connectivity with the adjoining “Tier 1 Serviced Lands”.

3.2.1 Findings of the Infrastructural Assessment Report (IAR)

It is noted that Proposed Amendment AP.1C.13 states that that the Zoning Map should be amended to *“take into consideration the OPR comments and the findings of the Infrastructural Assessment Report (IAR)” (emphasis added).*

The findings are best summarised in the Map in Figure 6 overleaf, which was included in Page 149, Appendix 10 of Part 3 Appendices to Chief Executive’s Report.

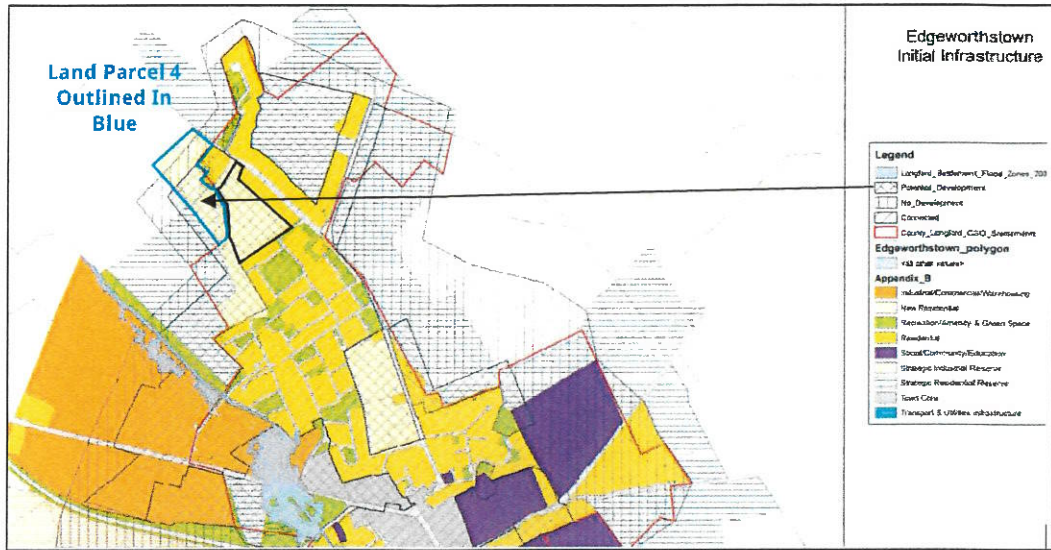


Figure 6 – Infrastructure Review Map Appendix 10 of Part 3 Appendices to LCC Chief Executive's Report

As can be seen, the majority of “Land Parcel 4”, outlined in blue above, is shaded as “Potential Development” in the Infrastructural Assessment Report (IAR). Given that the majority of “Land Parcel 4” is classified in the “Potential Development” category, it follows that all the remaining part of “Land Parcel 4” could also be grouped in the same “Potential Development” category, given the potential to propose pedestrian, vehicular and drainage connectivity to that remaining part of “Land Parcel 4”.

The remaining 3.1 ha of lands immediately adjacent and to the south east of “Land Parcel 4” (outlined in black) that forms part of the 6.3 ha at Bloomfield Park are also shaded as “Potential Development” in the Infrastructural Assessment Report (IAR).

The Infrastructural Assessment Report confirms that “Land Parcel 4” and the lands immediately adjoining them (referred to collectively as “Housing Lands R1” in map in the report – see Figure 7 overleaf) **have the highest infrastructural appropriateness score for potential development in Edgeworthstown** – see Table 2 below.

SEE ZONING MAP FOR ZONING REFERENCE NUMBER								
HOUSING LANDS	(R1)	R2	(R3)	(R4)	R5	R6	R7	R8
LONGFORD TOWN	98	98	96	96	73			
GRANARD	38	38	39	35	33			
BALLYMAHON	6	44	12	33	35	35	39	43
EDGEWORTHSTOWN	(55)	53	(52)	(34)				
	R1 contains Land Parcel 4		R3 is Land Parcel 31	R4 is zoned Recreation/ Amenity and Green Spaces				

Table 2 – Infrastructure Score Page 175 of Part 3 Appendices to LCC Chief Executive Report

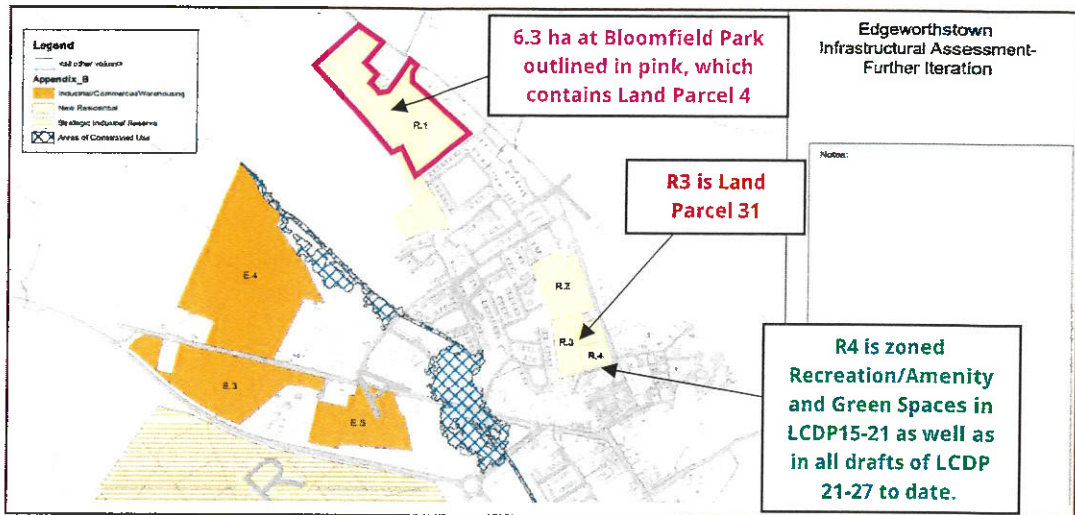


Figure 7 – Infrastructure Assessment Map Identifying Lands Referred to as “R1”

3.2.2 Tiered Approach to Zoning

The OPR has submitted (via Recommendation No. 6) that the *“Planning Authority demonstrate that the tiered approach to zoning required under the NPF (policies NPO 72a, NPO72b and NPO72c LCC Chief Executive Report: Part 1 27 refer) has been applied which has regard to the provisions of an Infrastructural Assessment Report, details of which must be included in the Development Plan, all in accordance with the methodology set out in Appendix 3 of the NPF.” (emphasis added)*

Appendix 3 of the NPF defines Tier 1: Serviced Zoned Land as:

“lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services. Inclusion in Tier 1 will generally require the lands to within the footprint of or spatially sequential within the identified settlement.”

We submit that all of “Land Parcel 4” can be categorised as ‘Tier 1: Serviced Lands’. There are surface and foul drainage connections already installed in the site. A Strategic Housing Development (SHD) application that will include “Land Parcel 4” will be lodged shortly. A SHD Tripartite Pre-Application Consultation Meeting with the County Council and An Bord Pleanála was held in February 2020 (ABP Reference 306260) with a view to applying for 120 houses on the 6.3 ha of lands, inclusive of all of “Land Parcel 4”. A Confirmation of Feasibility from Irish Water has since issued that, in combination with other feedback received in the SHD Tripartite-Pre-Application Consultation Meeting, has confirmed the Tier 1 status of the lands, i.e. that there is *“road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available”*. As set out in Figure 8 below, As set out in Figure 8 overleaf, an extract from the An Bord Pleanála’s Inspector’s Report, which was received subsequent to the SHD Tripartite Pre-Consultation Meeting, supports the Tier 1 status of the lands.

6.5.3 In relation to the **Principle of Development**, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The publication of the Regional Spatial and Economic Strategy for the Midlands and Eastern Region and implications for Edgeworthstown in terms of its future growth and development. It was confirmed by Longford Co. Co. that the County Development Plan is under review but it is not envisaged that there will be any significant change to the core strategy or settlement hierarchy. They confirmed they had no objection to the quantum of development proposed in light of the RSES. It was acknowledged that Edgeworthstown was an appropriate location for further growth having regard to the extent of services in the town and the fact that it was served by good public transport.

Figure 8 – Extract from ABP Inspector’s Report received after SHD Tripartite Pre-Application Consultation Meeting - ABP Reference 306260

3.2.3 Flooding

As shown in Figure 9 below, no part of the 6.3 ha lands at Bloomfield Park are located within a Flood Zone, as shown in the Flood Zone Map in the Infrastructure Assessment Review (6.3 ha outlined in yellow and “Land Parcel 4” is shaded pink, all of which are located within the Settlement Boundary outlined in red).

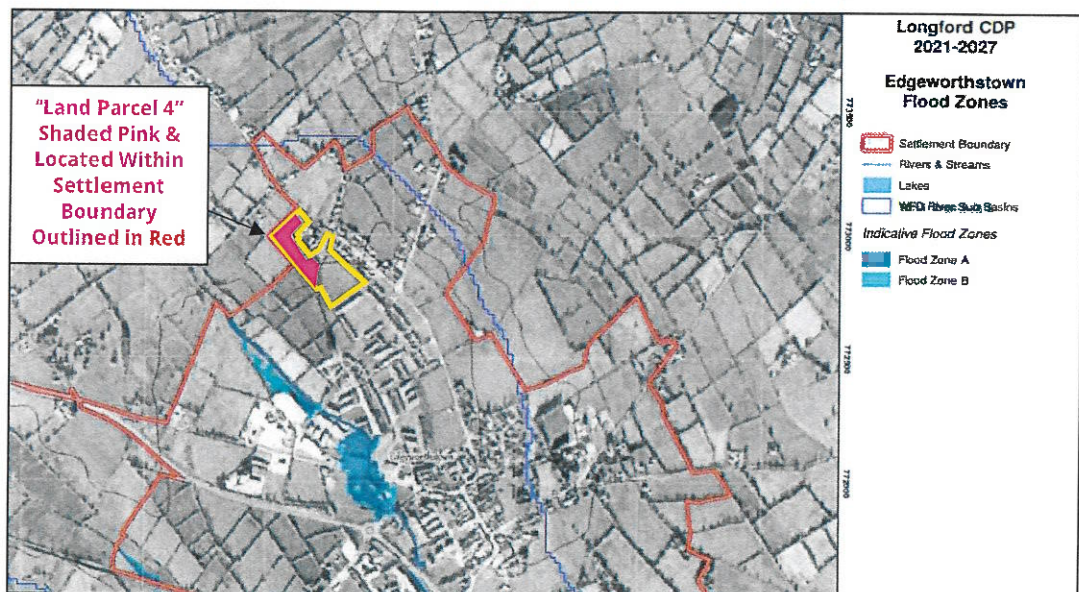


Figure 9 – Extract from Flood Zone Map from Infrastructure Assessment Report

3.2.4 Single, safe access to all of “Land Parcel 4”

As can be seen from the Proposed Housing Site Layout Plan for the 6.3 ha at Bloomfield Park in Figure 10 overleaf (which includes “Land Parcel 4” outlined in dashed yellow line), it is proposed to access all of the development in the 6.3 ha from a single entrance off the Bracklin Park Link Road (circled in blue), that is taken in charge by Longford County Council. Authorisation has been received from the County Council to utilise this entrance in any proposed future development of the lands.

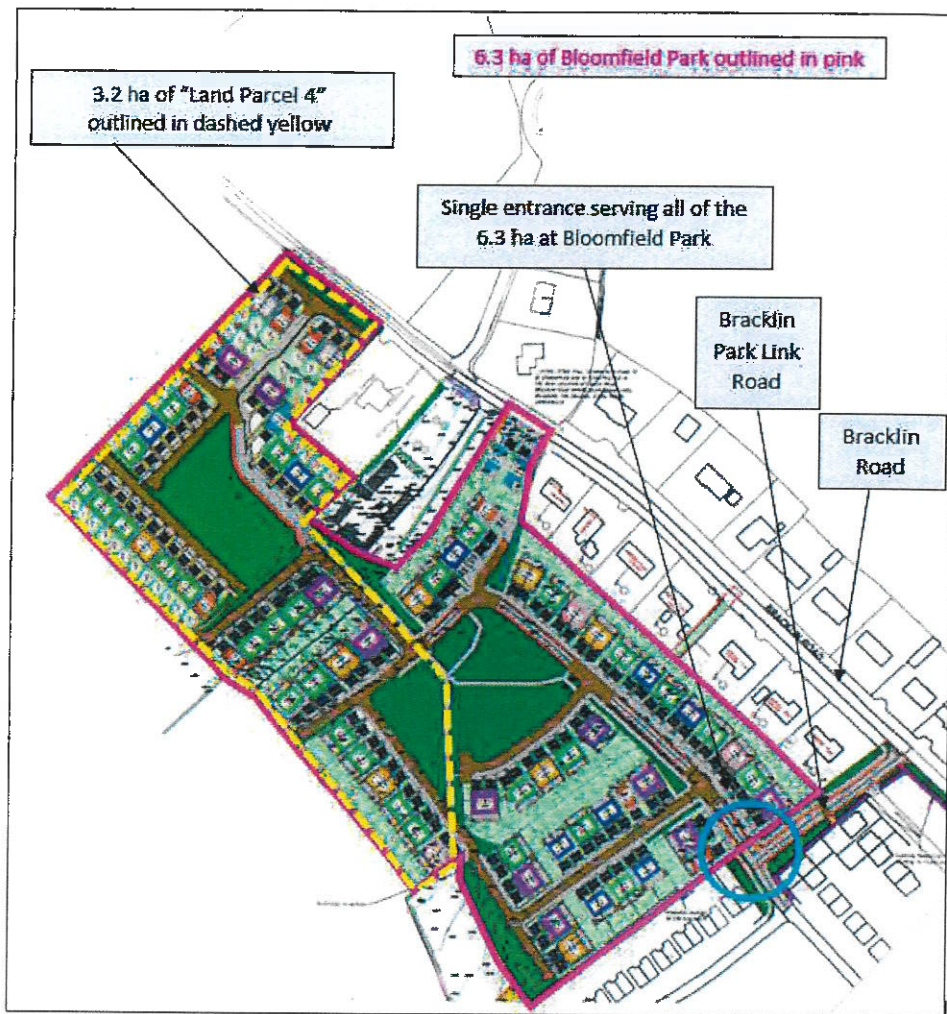


Figure 10 – Proposed Housing Site Layout Plan for the 6.3 ha at Bloomfield Park

The Sustainable Housing Guidelines specifically recommend (in Appendix 4) against the creation of ribbon development for a variety of reasons relating to road safety, future demands for the provision of public infrastructure as well as visual impacts. The Appendix states that other forms of development, such as clustered development, well set back from the public road and served by an individual entrance can be used to overcome these problems in facilitating necessary development in rural areas. The above proposed single access off the Bracklin Park Link Road, which can serve all potential development on the 6.3 ha at Bloomfield Park (inclusive of "Land Parcel 4") addresses any concerns regarding the potential of "Land Parcel 4" being categorised as "ribbon development".

Having regard to the Infrastructural Assessment Report and the positive analysis of "Land Parcel 4" therein, and also given the "Tier 1 Serviced Land" status of both "Land Parcel 4" and the immediately adjoining lands in Bloomfield Park to the south east, it is submitted that the residential zoning of all of "Land Parcel 4" should be retained in the County Development Plan 2021-2027 and by doing so, the Council will be addressing OPR Recommendation No. 6, i.e. that the *"Planning Authority demonstrate that the tiered approach to zoning required under the NPF has been applied which has regard to the provisions of an Infrastructural Assessment Report"*.

3.3 Reason C

Retention of “Residential” Zoning on “Land Parcel 4” would be in conformity with National & Regional Planning Objectives NPO 3C & RPO 3.2

We would wish to make the following observations on the Chief Executive’s Response to OPR Recommendation No. 7 (extract of same on page 6 above):

3.3.1 Definition of CSO Settlement

It appears that in the response to the OPR Recommendation, the Chief Executive has relied on the CSO Settlement definition in determining the extent of the zoning of greenfield areas per NPO 3c. This definition, stated in the response, is that the urban settlement boundary will be defined by locations where *“there are a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it, of 100 metres”*, (emphasis added).

The map in Figure 11 below, which we have prepared, shows “Land Parcel 4” (lands proposed to be de-zoned) outlined in dashed yellow line. The line in red donates the general CSO Settlement Boundary, which runs along the east/south east side of “Land Parcel 4”. The square areas highlighted in pink indicate a 100m x 100m square area, which 100m x 100m areas have been placed beside the buildings adjacent to the zoned lands in order to establish *“a maximum distance between any dwelling and the building closest to it, of 100 metres”* per the CSO Settlement definition. The areas highlighted in pink can be considered as being within the CSO defined urban settlement boundary, as these areas are within 100m of the buildings located in an area where *“there are a minimum of 50 occupied dwellings”*.

It is evident in this map that the vast majority of “Land Parcel 4” can be construed as being within the CSO defined urban settlement boundary. “Land Parcel 4” should therefore not be classified as greenfield and should instead be retained as “Residential” Zoning.

It is also noteworthy that the Flood Zone Map in Figure 9 above, which was used as part of the Infrastructure Assessment Review, shows all of “Land Parcel 4” being within the “Settlement Boundary” of Edgeworthstown.



Figure 11 – Map Showing 100 m distance from last building within CSO Defined Boundary

3.3.2 RPO 3.2 requires lands contiguous to built up areas to be designated for new homes

RPO 3.2 states

“Local authorities, in their core strategies, shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.”

The above reference to “contiguous to” (generally defined as “*being in actual contact: touching along a boundary or at a point*”) would suggest that the “compact urban development target” per the RPO 3.2 includes lands that are located along the boundary of a built up area. Accordingly, “Land Parcel 4” would fall under this definition and its development would satisfy the objective of RPO 3.2.

Based on the foregoing, there is a sustainable and planning basis under both National and Regional Planning Objectives to retain the current “Residential” zoning on “Land Parcel 4”.

3.4 Reason D

The only other lands in Edgeworthstown (other than Bloomfield Park) that are proposed to remain as “Residential” in the next County Development Plan 2021-2027 have a low probability of being developed for housing within the lifetime of the next County Development Plan, as they

- **have significant wayleave constraints**
- **have a more inferior infrastructure appropriateness score ranking compared to Bloomfield Park and**
- **have never been granted planning permission, with all three historic planning applications refused by An Bord Pleanála**

The quantity of Residentially Zoned land is referred to in OPR Recommendations 4 and 5 and Observations 1 and 2. The OPR states they are *“of the view that the quantity of land zoned for residential use, or a mixture of residential and other uses, remains in excess of the population and housing targets set out in the Core Strategy”*.

The OPR requested the Core Strategy to be updated to reflect the latest density assumptions and to reconsider and appropriately reduce the provision of all zoned residential land, and land zoned for a mix of residential and other uses, to align with the quantity of land necessary to accommodate housing supply targets in the (revised) Core Strategy. The Revised Core Strategy is set out in Figure 12 overleaf.

It is noted that there is a Housing Supply Target of 162 units for Edgeworthstown within the lifetime of the next CDP up to 2027. Edgeworthstown is to be categorised as a ‘Self Sustaining Town’, with a residential density of 25 units per hectare permitted. Accordingly, the Core Strategy identifies a requirement of 6.48 ha of residentially zoned Land in Edgeworthstown (i.e. 162 units @ 25 units per hectare = 6.48 ha) in order to meet the Housing Supply Target of 162 units up to 2027.

	Settlement	Population 2016	NEW Population Growth to 2027	Population 2027	NEW HST Units 2021-2027	% of Required Residential Units Within Existing Settlement	Quantum of Land Required for New Residential Units to 2027 (ha)	Quantum of Land Zoned for New Residential Units under this Plan (ha)	Quantum of Land Zoned Within Existing Settlement (Brownfield/08) (ha)	Potential Units that can be Delivered Within Existing Settlement (Brown Residential) (ha)
Key Town (Density 35.40 units/ha)	Longford Town	10008	2802	12810	1304	391	34.77	35.33	35.33	1304
Self-Sustaining Growth Town (25 units/ha)	Granard	1086	274	1370	143	43	5.71	6.40	5.31	133
Self-Sustaining Towns (25 units/ha)	Edgeworthstown	2072	311	2383	162	49	6.48	7.10	7.10	162
	Ballymahon	1877	282	2159	147	44	5.87	6	5.20	130
	Lanesborough	757	151	908	79	24	3.95	4.42	1.87	47

Figure 12 – Table 4.12: Revised Core Strategy Table

In order to meet the Housing Supply Target of 162 units up to 2027, the Core Strategy indicates that 7.10 ha of land should be zoned for residential in Edgeworthstown, which appears in the first instance to be a sufficient amount of zoned land to meet this target. However, upon closer analysis of the 7.10 hectares, there are a number of reasons why it is very unlikely the housing unit target of 162 units within the life of the next CDP will be met unless “Land Parcel 4” is retained as “Residential” in the next CDP.

Figure 13 below is the proposed Zoning Map that shows the breakdown of the 7.10 ha proposed to be zoned “Residential” in the next CDP – there are essentially two separate plots making up the 7.10 ha outlined in pink –

- the plot to the north is 3.3 ha (3.1 ha of which is part of Bloomfield Park)
- the plot to the south east is 3.8 ha (and includes “Land Parcel 31”, which is circa 1.5 ha)
- 3.3 ha + 3.8 ha = 7.10 ha

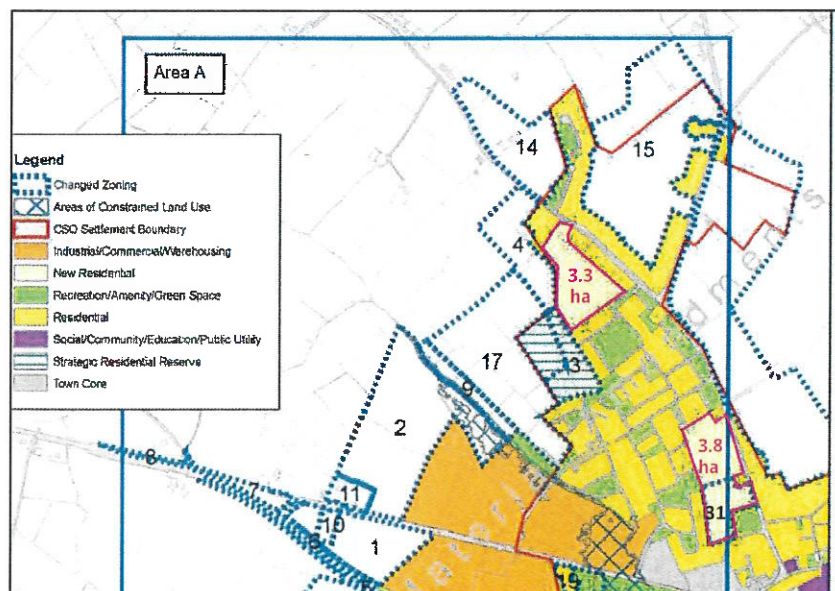


Figure 13 – Breakdown of 7.1 ha (3.3 ha + 3.8 ha) of Lands Proposed to be Zoned Residential in CDP 2021-2027

The 3.8 ha of other lands, which are circa 400 metres to the south east of the Bloomfield Park lands, have not come forward for development in recent times as it appears that the land is constrained by wayleaves in favour of the County Council and the ESB Networks.

These wayleaves were one of the principal reasons why An Bord Pleanála refused planning permission for the last planning application over 14 years ago in 2007.

The constraints associated with these lands were also acknowledged by Longford County Council at the SHD Tripartite Pre-Application Consultation Meeting regarding the Bloomfield Park lands held with the County Council and An Bord Pleanála in February 2020 (ABP Reference 306260). The extract from the ABP Inspector's Report in Figure 14 below, refers to the "other parcel of land zoned for residential development", i.e. the 3.8 ha lands located circa 400 metres to the south east of the Bloomfield Park lands.

6.5.3 In relation to the **Principle of Development**, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- > The appropriateness of the lands for development in terms of the sequential approach set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009), and having regard to the core strategy, extent of zoned land and extant permissions. **It was highlighted by Longford County Council that other parcel of land zoned for residential development had not come forward for development and that there were constraints associated with it.**

Figure 14 – Extract from ABP Inspector's Report received subsequent to the SHD Tripartite Pre-Application Consultation Meeting - ABP Reference 306260

Approx 1.5 ha of the 3.8 ha site, or 40% of the site, represented by Land Parcel 31 in Figure 13 above and referred to as "R3" in the Council's Infrastructural Assessment Report, was provided with the most inferior infrastructure score for **residentially zoned land** in Edgeworthstown (see Figure 7 & Table 2 above). This Land Parcel 31 was proposed to be rezoned from "Residential" to "Strategic Residential Reserve", however this initial proposal has now been reversed in the most recent Draft of the LCDP21-27, subsequent to the OPR submissions received (See text highlighted blue in Figure 4 above).

The 3.8 ha of lands also have negative planning history - Permission has been refused three times on the lands under the following references -

- Ref no. 04/446; ABP PL.14.208541
- Ref no. 05/39; ABP PL14.212930
- Ref no. 07/270; ABP PL14.226680

There has not been a planning proposal to develop these lands since the last application was made 15 years ago in 2006.

Accordingly, for the reasons set out above, it is highly likely that all of the 3.8 ha of lands located circa 400 metres to the south east of Bloomfield Park will not be developed within the lifetime of the next CDP to 2027, notwithstanding the historic and proposed "Residential" zoning on those lands. The negative planning history of these lands is not comparable to the Bloomfield Park planning history, as planning permission has been granted by An Bord Pleanála for 81 houses on Bloomfield Park, which expired in 2017 [ABP Ref 218458 (78 houses) and ABP Ref 231422 (3 additional houses)]. 42 of these 81 permitted houses were located within the boundaries of "Land Parcel 4".

The above analysis suggests that the only lands which are proposed to be zoned “Residential” in the next CDP and which are likely to be developed are the remaining 3.1 ha lands at Bloomfield Park. This land would facilitate circa 78 houses based on the proposed density of 25 units per hectare for Edgeworthstown as a ‘Self Sustaining Town’ in the forthcoming County Development Plan. **78 houses would represent only 48% of the 162 houses targeted to be developed in Edgeworthstown up to 2027 per the Revised Core Strategy.**

In the response to the OPR Recommendation the Chief Executive states:

“It should be noted that the Planning Authority is required to meet their statutory obligations by ensuring that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the Housing Strategy and to ensure that a scarcity of such land does not occur at any time during the period of the County Development Plan. Such an approach will negate the need for unplanned material contravention scenarios due to the absence of suitable lands for development.” (emphasis added)(page 24 LCC Chief Executive Report: Part 1)

The above demonstrates that it is necessary for the “Residential” zoning on “Land Parcel 4” to be retained in order for the Planning Authority in respect of Edgeworthstown to:

- meet its statutory obligations,
- to avoid an unplanned material contravention, and
- to meet the target of 162 houses to be constructed in the settlement in the period up to 2027.

Accordingly, we would respectfully request that the “Residential” Zoning of “Land Parcel 4” in the next County Development Plan 2021-2027.

“Land Parcel 4” which is 3.2 ha, is an integral part of the 6.3 ha Bloomfield Park SHD application that will be lodged shortly. “Land Parcel 4” has the potential to provide for 80 additional houses (3.2 ha x 25 units per hectare = 80 units). These potential houses, in combination with the potential 78 houses on the 3.1 ha adjoining “Land Parcel 4”, could eventually provide 158, or 97.5% of the 162 housing target for Edgeworthstown up to 2027.

4. Conclusion

As set out above, the retention of the “Residential” Zoning on “**Land Parcel 4**” is requested for the following reasons:

- It would be in full compliance with National and Regional Planning Objectives (NPO 3c and RPO 3.2);
- It would be in accordance with the tiered approach to zoning required under the NPF (Appendix 3) given the Tier 1 Serviced Lands status of the lands;
- It would be in compliance with the findings of the County Council’s Infrastructure Assessment Report;
- It would be appropriate to develop “**Land Parcel 4**”, as the site has the highest Infrastructure Appropriateness Score ranking for housing development in Edgeworthstown, relative to other lands which are proposed to be zoned residential;

- given the constraints on the development potential of the other proposed residentially zoned land, it would obviate the need for an unplanned material contravention scenario due to the absence of suitable lands for development in Edgeworthstown within the lifetime of the next CDP.
- There is a precedent for planning permission being granted on “Land Parcel 4”, with the previous permission expiring as recently as 2017.
- A Strategic Housing Development (SHD) planning application is presently being finalised, for which a SHD Tripartite Pre Consultation Meeting with LCC and ABP has already taken place and for which “Land Parcel 4” was included in same. The Board are unable to materially contravene on matters related to zoning under the SHD legislation and accordingly, the SHD will no longer be possible if “Land Parcel 4” does not retain its residential zoning.

Based on the above reasons, it is respectfully requested that the Residential Zoning in “Land Parcel 4” is retained and is designated as “New Residential” in the Longford County Development Plan 2021 – 2027.

Yours faithfully



**Ian McGrandles MIPI, MRTPI
Director**