

Sub 46

**Deirdre Skelly**

---

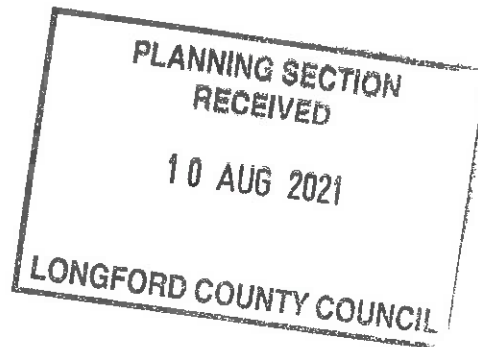
**From:** Sara Gillooley <Sara@cunninghamdp.ie>  
**Sent:** Tuesday 10 August 2021 15:38  
**To:** cdp  
**Subject:** EXTERNAL - Zoning Submission For LPJ Contractors at Drumlish, Co. Longford  
**Attachments:** Zoning Submission for Existing Lands At Drumlish, Co. Longford For LPJ Contractors - 47.pdf

**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hi Ann,  
Please find attached our submission for LPJ Contractors.  
Kindest regards,

Sara Gillooley  
Personal Assistant/Secretary

Email: [sara@cunninghamdp.ie](mailto:sara@cunninghamdp.ie)  
Telephone: 043-3340450  
Address: Cunningham Design & Planning,  
Block C, N4 Axis Centre, Longford,  
Co. Longford, N39 X7W0.



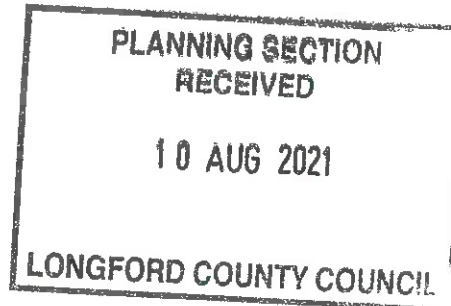
Mark Cunningham BEng, MSc, CEng, MIEI.  
Chartered Engineer and Assigned Certifier



Red Cow Design & Planning Limited Trading As  
**CUNNINGHAM DESIGN & PLANNING**  
Consulting Engineers

Block C  
N4 Axis Centre  
Longford  
Co. Longford

Tel: 043 33 40450  
Mob: 087 850 9554  
Email: mark@cunninghamdp.ie  
Website: www.cunninghamdp.ie



Date: 09/08/2021

Dear Sir/Madam,

**Re: Zoning Submission For Existing Lands At Drumlish, Co. Longford For LPJ Contractors Ltd.**

I refer to the above proposed material amendments County Development Plan 2021 – 2027 map of Drumlish a copy of which is attached in *Appendix A* for ease of reference. We as Chartered Engineers and Assigned Certifiers on behalf of the owner made a previous submission on 18/01/2021 a copy of which is attached in *Appendix B* for ease of reference.

Please note that this submission relates to the portion of lands shown denoted “47” on the enclosed map in *Appendix A*. On our previous submission dated 18/01/2021 we respectively suggested that the lands should be changed from “Strategic Residential Reserve” to “Residential” for the reasons outlined in that submission but instead the lands in question have now been changed to “No Zoning”. It is my professional opinion that since the lands denoted “47” on the enclosed map in *Appendix A* and are/were zoned “Strategic Residential Reserve” on both the current County Development Plan 2015-2021 and also the previous draft zoning maps for The County Development Plan 2021-2027 as is evident on the respective maps attached in *Appendix C* where the lands in question are outlined in blue and denoted “47” for ease of reference that these lands should be changed back to “Strategic Residential Reserve”.

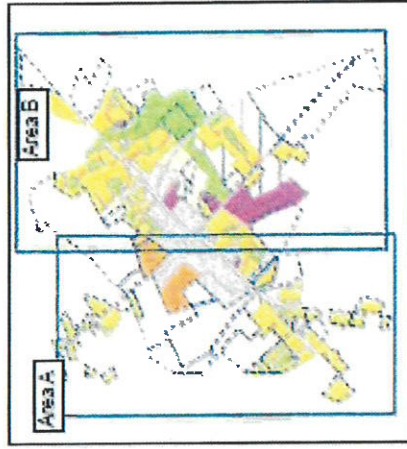
Yours sincerely,

Signed: \_\_\_\_\_  
*Mark Cunningham, BEng, MSc, CEng, MIEI.*

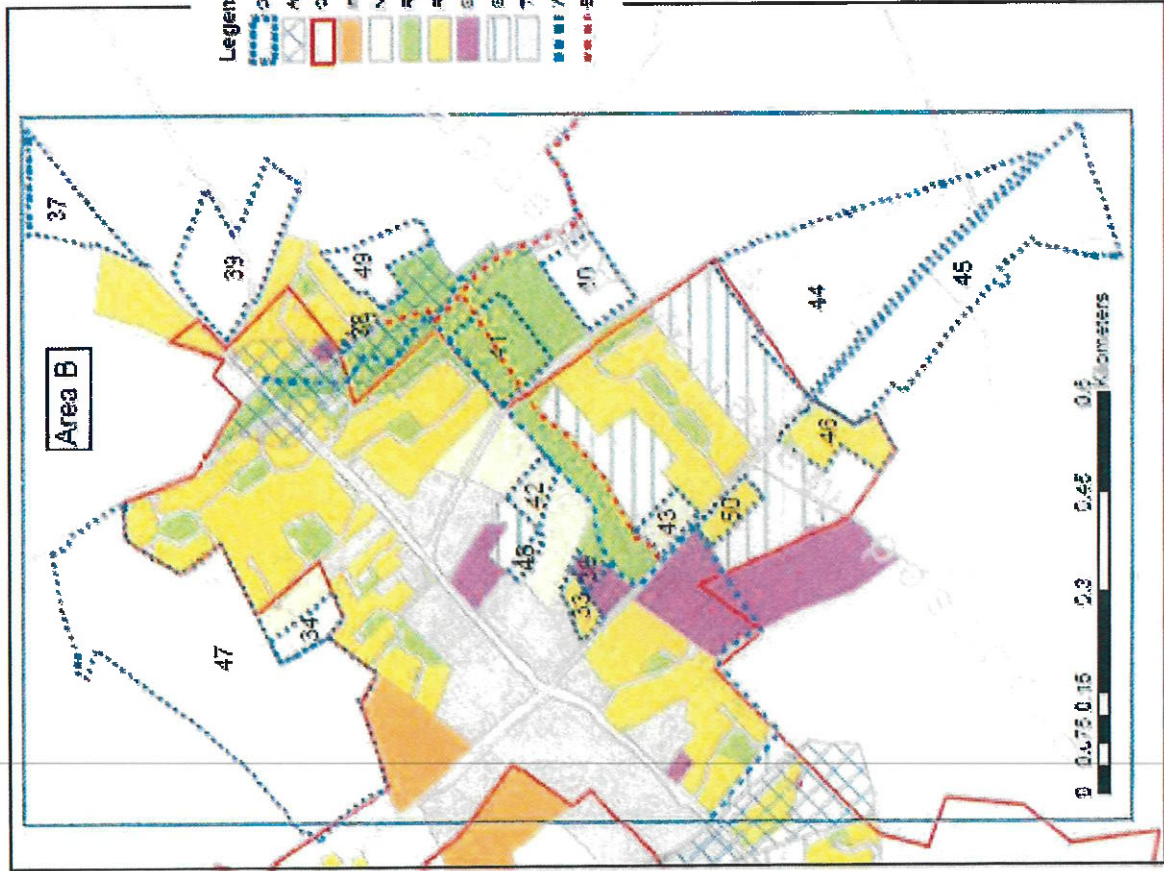
# *Appendix A*

---

# Drumlish Proposed Material Amendments County Development Plan 2021-2027



- Legend**
- Strategic Zoning
  - Areas of Designated Land Use
  - CCDC Settlement Boundary
  - Industrial/Commercial/Manufacturing
  - New Residences
  - Recreational/Amenity/Green Space
  - Residents
  - Social/Community/Educational/Public Units
  - Strategic Residential Reserve
  - Town Core
  - Valleys (Ancient)
  - Single Farm Units



**Zoning Changes - Area B**

Code Plan Zoning in Code	Allocation Proposed Zoning	Facilities Area on Map
Residential New Residential	Residential	37
	Residential	34
	Open/Community/Community Facility	35
	Open	
Residential/University/Other Space	Residential	37
	Residential	34
Strategic Residential Reserve	Residential	34, 40, 44, 47, 48
	Residential	41
	Open/Community/Community Facility	42, 43, 45
	Residential	46, 47

Valleys (Ancient)  
 Single Farm Units

Only Strategic Residential Reserve  
 Strategic Reserve includes residential area 40,  
 44, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56,  
 57, 58, 59, 60, 61, 62, 63, 64, 65, 66,  
 67, 68, 69, 70, 71, 72, 73, 74, 75, 76,  
 77, 78, 79, 80, 81, 82, 83, 84, 85, 86,  
 87, 88, 89, 90, 91, 92, 93, 94, 95, 96,  
 97, 98, 99, 100, 101, 102, 103, 104, 105,  
 106, 107, 108, 109, 110, 111, 112, 113,  
 114, 115, 116, 117, 118, 119, 120, 121,  
 122, 123, 124, 125, 126, 127, 128, 129,  
 130, 131, 132, 133, 134, 135, 136, 137,  
 138, 139, 140, 141, 142, 143, 144, 145,  
 146, 147, 148, 149, 150, 151, 152, 153,  
 154, 155, 156, 157, 158, 159, 160, 161,  
 162, 163, 164, 165, 166, 167, 168, 169,  
 170, 171, 172, 173, 174, 175, 176, 177,  
 178, 179, 180, 181, 182, 183, 184, 185,  
 186, 187, 188, 189, 190, 191, 192, 193,  
 194, 195, 196, 197, 198, 199, 200, 201,  
 202, 203, 204, 205, 206, 207, 208, 209,  
 210, 211, 212, 213, 214, 215, 216, 217,  
 218, 219, 220, 221, 222, 223, 224, 225,  
 226, 227, 228, 229, 230, 231, 232, 233,  
 234, 235, 236, 237, 238, 239, 240, 241,  
 242, 243, 244, 245, 246, 247, 248, 249,  
 250, 251, 252, 253, 254, 255, 256, 257,  
 258, 259, 260, 261, 262, 263, 264, 265,  
 266, 267, 268, 269, 270, 271, 272, 273,  
 274, 275, 276, 277, 278, 279, 280, 281,  
 282, 283, 284, 285, 286, 287, 288, 289,  
 290, 291, 292, 293, 294, 295, 296, 297,  
 298, 299, 300, 301, 302, 303, 304, 305,  
 306, 307, 308, 309, 310, 311, 312, 313,  
 314, 315, 316, 317, 318, 319, 320, 321,  
 322, 323, 324, 325, 326, 327, 328, 329,  
 330, 331, 332, 333, 334, 335, 336, 337,  
 338, 339, 340, 341, 342, 343, 344, 345,  
 346, 347, 348, 349, 350, 351, 352, 353,  
 354, 355, 356, 357, 358, 359, 360, 361,  
 362, 363, 364, 365, 366, 367, 368, 369,  
 370, 371, 372, 373, 374, 375, 376, 377,  
 378, 379, 380, 381, 382, 383, 384, 385,  
 386, 387, 388, 389, 390, 391, 392, 393,  
 394, 395, 396, 397, 398, 399, 400, 401,  
 402, 403, 404, 405, 406, 407, 408, 409,  
 410, 411, 412, 413, 414, 415, 416, 417,  
 418, 419, 420, 421, 422, 423, 424, 425,  
 426, 427, 428, 429, 430, 431, 432, 433,  
 434, 435, 436, 437, 438, 439, 440, 441,  
 442, 443, 444, 445, 446, 447, 448, 449,  
 450, 451, 452, 453, 454, 455, 456, 457,  
 458, 459, 460, 461, 462, 463, 464, 465,  
 466, 467, 468, 469, 470, 471, 472, 473,  
 474, 475, 476, 477, 478, 479, 480, 481,  
 482, 483, 484, 485, 486, 487, 488, 489,  
 490, 491, 492, 493, 494, 495, 496, 497,  
 498, 499, 500, 501, 502, 503, 504, 505,  
 506, 507, 508, 509, 510, 511, 512, 513,  
 514, 515, 516, 517, 518, 519, 520, 521,  
 522, 523, 524, 525, 526, 527, 528, 529,  
 530, 531, 532, 533, 534, 535, 536, 537,  
 538, 539, 540, 541, 542, 543, 544, 545,  
 546, 547, 548, 549, 550, 551, 552, 553,  
 554, 555, 556, 557, 558, 559, 560, 561,  
 562, 563, 564, 565, 566, 567, 568, 569,  
 570, 571, 572, 573, 574, 575, 576, 577,  
 578, 579, 580, 581, 582, 583, 584, 585,  
 586, 587, 588, 589, 590, 591, 592, 593,  
 594, 595, 596, 597, 598, 599, 600, 601,  
 602, 603, 604, 605, 606, 607, 608, 609,  
 610, 611, 612, 613, 614, 615, 616, 617,  
 618, 619, 620, 621, 622, 623, 624, 625,  
 626, 627, 628, 629, 630, 631, 632, 633,  
 634, 635, 636, 637, 638, 639, 640, 641,  
 642, 643, 644, 645, 646, 647, 648, 649,  
 650, 651, 652, 653, 654, 655, 656, 657,  
 658, 659, 660, 661, 662, 663, 664, 665,  
 666, 667, 668, 669, 670, 671, 672, 673,  
 674, 675, 676, 677, 678, 679, 680, 681,  
 682, 683, 684, 685, 686, 687, 688, 689,  
 690, 691, 692, 693, 694, 695, 696, 697,  
 698, 699, 700, 701, 702, 703, 704, 705,  
 706, 707, 708, 709, 710, 711, 712, 713,  
 714, 715, 716, 717, 718, 719, 720, 721,  
 722, 723, 724, 725, 726, 727, 728, 729,  
 730, 731, 732, 733, 734, 735, 736, 737,  
 738, 739, 740, 741, 742, 743, 744, 745,  
 746, 747, 748, 749, 750, 751, 752, 753,  
 754, 755, 756, 757, 758, 759, 760, 761,  
 762, 763, 764, 765, 766, 767, 768, 769,  
 770, 771, 772, 773, 774, 775, 776, 777,  
 778, 779, 780, 781, 782, 783, 784, 785,  
 786, 787, 788, 789, 790, 791, 792, 793,  
 794, 795, 796, 797, 798, 799, 800, 801,  
 802, 803, 804, 805, 806, 807, 808, 809,  
 810, 811, 812, 813, 814, 815, 816, 817,  
 818, 819, 820, 821, 822, 823, 824, 825,  
 826, 827, 828, 829, 830, 831, 832, 833,  
 834, 835, 836, 837, 838, 839, 840, 841,  
 842, 843, 844, 845, 846, 847, 848, 849,  
 850, 851, 852, 853, 854, 855, 856, 857,  
 858, 859, 860, 861, 862, 863, 864, 865,  
 866, 867, 868, 869, 870, 871, 872, 873,  
 874, 875, 876, 877, 878, 879, 880, 881,  
 882, 883, 884, 885, 886, 887, 888, 889,  
 890, 891, 892, 893, 894, 895, 896, 897,  
 898, 899, 900, 901, 902, 903, 904, 905,  
 906, 907, 908, 909, 910, 911, 912, 913,  
 914, 915, 916, 917, 918, 919, 920, 921,  
 922, 923, 924, 925, 926, 927, 928, 929,  
 930, 931, 932, 933, 934, 935, 936, 937,  
 938, 939, 940, 941, 942, 943, 944, 945,  
 946, 947, 948, 949, 950, 951, 952, 953,  
 954, 955, 956, 957, 958, 959, 960, 961,  
 962, 963, 964, 965, 966, 967, 968, 969,  
 970, 971, 972, 973, 974, 975, 976, 977,  
 978, 979, 980, 981, 982, 983, 984, 985,  
 986, 987, 988, 989, 990, 991, 992, 993,  
 994, 995, 996, 997, 998, 999, 1000



# *Appendix B*

---



Red Cow Design & Planning Limited Trading As  
**CUNNINGHAM DESIGN & PLANNING**  
Consulting Engineers

Block C  
N4 Axis Centre  
Longford  
Co. Longford

Tel: 043 33 40450  
Mob: 087 850 9554  
Email: mark@cunninghamdp.ie  
Website: www.cunninghamdp.ie

---

Date: 18/01/2021

Dear Sir/Madam,

**Re: Zoning Submission For Existing Lands At Drumlish, Co. Longford For LPJ Contractors Limited (Folio No. LD814F).**

I refer to the above and I wish to inform the relevant parties that I as Chartered Engineer and Assigned Certifier am familiar with the above-mentioned property and I attach in *Appendix A* a screen shot from Landdirect which shows LPJ Contractors Ltd landholding at this location. In addition please find attached in *Appendix B* the relevant Draft Zoning Map of Drumlish for the proposed County Development Plan 2021 – 2027 which shows the lands in question outlined in blue and denoted with the letter “A” for ease of reference.

It is our professional opinion that the lands in question should be zoned “New Residential” instead of “Strategic Residential Reserve” because The National Planning Framework identifies the ‘Midlands Regional Area’ which includes Longford as an important strategic growth area:

*“It central location in Ireland can be leveraged to enable significant strategic investment to a greater extent than at present, supported by a sustainable pattern of population growth, with a focus on strategic national employment and infrastructure development, quality of life and a strengthening of the urban core of the county towns and other principal settlements”.*

Within this, Athlone is identified as the primary regional centre which acts as focal point for large geographical areas in its hinterland. It is earmarked for significant capacity to grow sustainably, secure investment for and work positively with adjacent interdependent areas.

National Policy Objective 3a states it is the intention of the government to concentrate a sizable proportion of development in existing settlements:

*“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements”.*

Section 4.5 underlines the importance of achieving urban infill/brownfield development, which is formalised under National Policy Objective 11:

*“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth”.* It is our professional opinion that since Drumlish is located within 10 Km of Longford Town and with an excellent road infrastructure that Drumlish is therefore ideally situated.

Alongside the above, the subject site constitutes ‘Infill’ land. The National Planning Framework emphasises the importance of developing such land to realise compact growth. Section 4.5 of the framework states that this principle is *“applicable to all scales of settlement, from largest city, to the smallest village”*. As outlined in the policy section above, national objective 11 states categorically that there is a presumption in favour of developing such lands within existing settlements. Allied to this by rezoning the lands ‘New Residential’ will also contribute directly to regeneration and rejuvenation objectives in the National Planning Framework which underline the importance of using as of yet undeveloped land with development potential in urban areas to deliver affordable homes and the creation of mixed-use communities.

### **HOUSING DEMAND**

There is demand for new housing locally. A review of market reports confirms a year-on-year increase in average house prices of 19% in County Longford in 2017<sup>1</sup>. Average housing rents increased by 7.8% over the same period<sup>2</sup>. Drumlish also has an important role to play in offsetting demand for urban-generated rural housing in the hinterland of the town

Further, demand for future development in Drumlish will be driven directly by the contents of the National Planning Framework which identifies the ‘Midlands Regional Area’ which includes Longford as strategically important. Athlone is identified as a primary regional growth centre which acts as focal point for large geographical areas in its hinterland.

It is earmarked for significant capacity to grow, secure investment for and work positively with adjacent interdependent areas. Drumlish is approximately 57 km from Athlone. The

---

<sup>1</sup> The Daft.ie House Price Report, Q4 2017

<sup>2</sup> The Daft.ie Rental Price Report, Q4 2017

continued maintenance and consolidation of growth in Drumlish will ensure it is best placed to deliver on this potential.

At a highest level, accelerating delivery of housing for the private, social and rented sectors is a key priority for the Government. Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets people's different needs and is of lasting quality is identified as one of the greatest challenges facing the country at present. *'Rebuilding Ireland – Action Plan for Housing and Homelessness'* gives effect to the Government objective *"to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs"*. This Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021. The location and suitability of the subject lands and by rezoning same "New Residential" will contribute positively to meeting this.

Please also note that the lands in question can be easily serviced with foul sewer, surface water and watermain networks and whereby the existing newly installed wastewater treatment plant which services the Town of Drumlish has adequate capacity for this proposed change of zoning. In addition, please note that the subject lands of this submission can be serviced via connection to the gravity feed foul sewer line which services the existing adjacent Esker Glen housing estate and would eliminate the need for making a foul sewer connection on the nearby public road.

Finally both vehicular and pedestrian access can be provided to the subject lands in question through the internal access roads and footpaths that service the adjacent housing estates of Esker Glen and Mill Oaks.

Should you require any further clarity then please do not hesitate to contact me.

Yours sincerely,

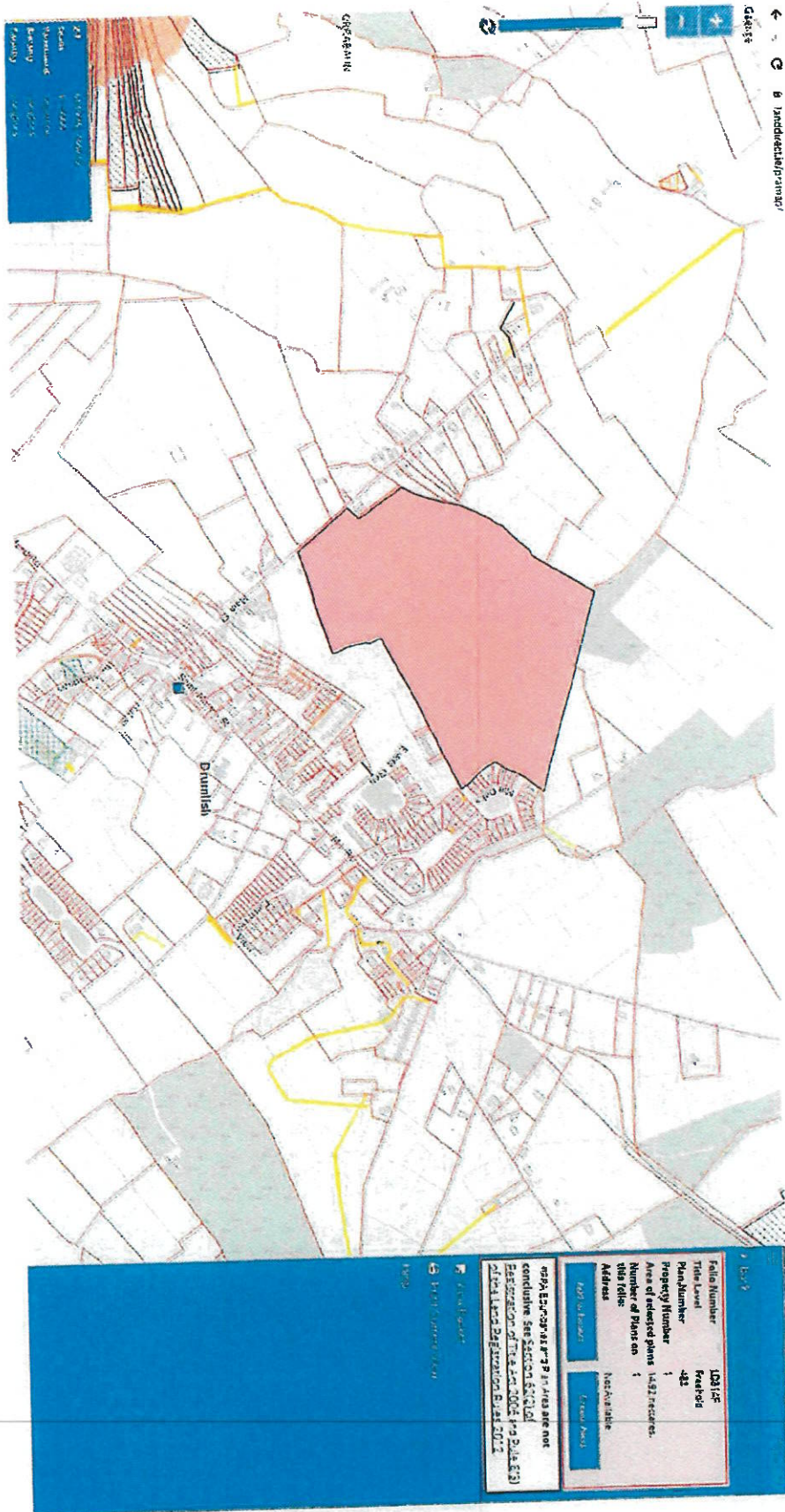


Signed: \_\_\_\_\_  
*Mark Cunningham, BEng, MSc, CEng, MIEI.*



# *Appendix A*

---



[←](#) [↻](#) [🔍](#) [📄](#) [🗺️](#) [🔗](#) [📑](#) [🔔](#) [⌵](#)

- 📄** 1:10000
- 🗺️** 1:20000
- 🔗** 1:50000
- 📑** 1:100000
- 🔔** 1:200000
- ⌵** 1:500000

Dumlich

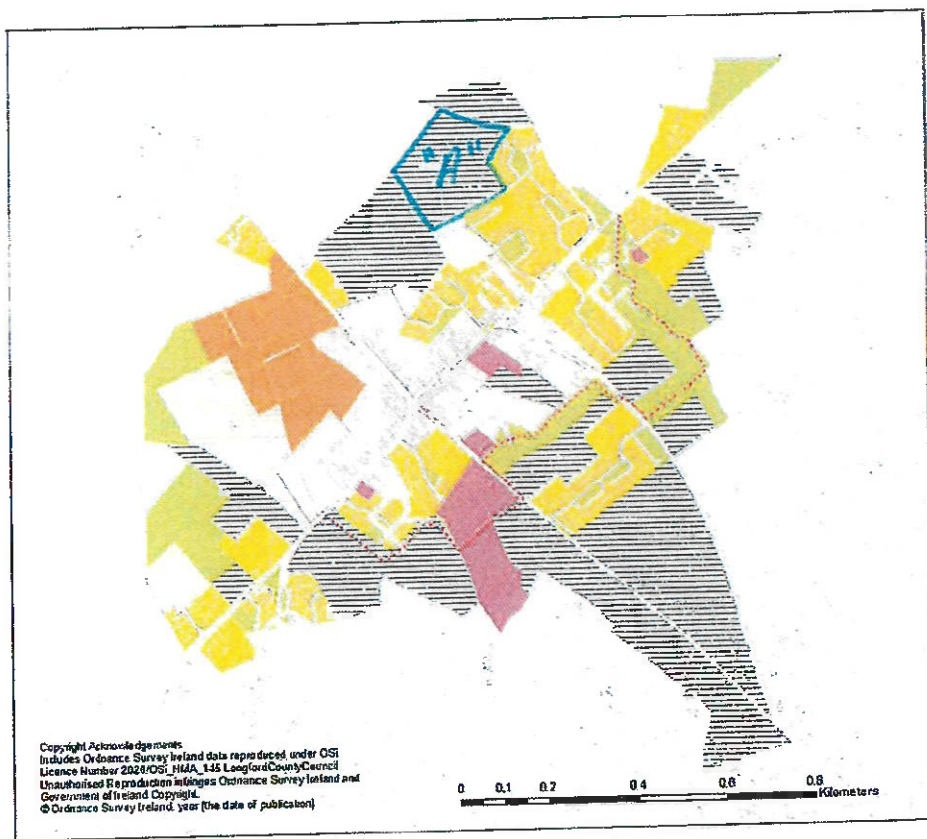
Parcel Number	108125
Title Level	Final
Plan Number	483
Property Number	1
Area of selected parcel	14.82 hectares
Number of Parcels	1
Vias (Id)	
Address	
<a href="#">Add address</a>	<a href="#">View info</a>
<a href="#">Add address</a>	<a href="#">View info</a>

108125 Parcel 1 in Area are not  
 conclusive. See Section 5(1)(a)  
 Registration of Titles Act 2008 (No 58 of  
 Act of 2008) Registration Book 2012

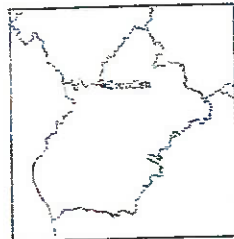
[🏠](#) [🗺️](#) [🔍](#) [📄](#) [🗺️](#) [🔗](#) [📑](#) [🔔](#) [⌵](#)

# *Appendix B*

---



**Drumlish Zoning Map**  
 County Development Plan 2021-2027



- Legend**
- Suburban/Commercial/Workhousing
  - High Residential
  - Recreational/Amenity/Green Spaces
  - Residential
  - Site Allocation Checks
  - Social/Community/Education
  - Strategic Industrial Reserve
  - Strategic Residential Reserve
  - Town Core
  - Village Walkway

Note: Plans on this map were prepared using the latest version of Ordnance Survey mapping available.  
 Overlap on the accuracy of boundaries may be discussed and addressed at pre-lodgement stage with the Planning Authority.

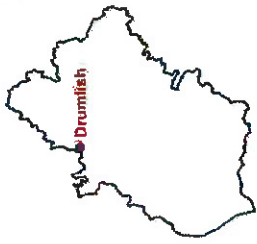


# *Appendix C*

---



Note: The Strategic Flood Risk Assessment which was undertaken alongside the preparation of the Plan and informed by site walkers, local knowledge and mapping from the Office of Public Works indicates flood risk in parts of this area - see associated Strategic Flood Risk Assessment which accompanies this Plan. Landowners in areas, including existing development sites, indicated as prone to flooding should satisfy themselves prior to the making of any planning application of the potential of flooding on these sites. Proposals for development on such lands identified shall complete a Justification Test of a site specific detailed Flood Risk Assessment which clearly demonstrates the suitability of the lands to be developed in accordance with the requirements of the Flood Risk Management Guidelines 2009.



**Drumlish Zoning Map**  
**County Development Plan 2015 - 2021**

- Commercial/Residential
- Established/Residential
- Industrial/Warehousing
- Recreation/Amenity and Green Spaces
- Residential
- Site Resolution Objective
- Social/Community/Education
- Strategic Industrial Reserve
- Strategic Residential Reserve
- Village Walkway



Map Scale 1:6000

Copyright Acknowledgements  
 Includes Ordnance Survey Ireland data reproduced under OSI Licence Number 2014/18/CCMA/1, copyright County Council. Unauthorised reproduction infringes Ordnance Survey Ireland and Government of Ireland Copyright.

**NOTE:**

Please note that every effort has been made to include the latest version of Ordnance Survey mapping available, and all attempts have been made to accurately assess boundaries and zonings.

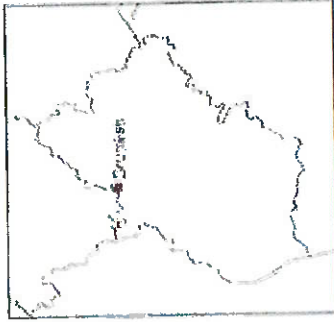
Queries on the accuracies of boundaries may be discussed and addressed at pre-planning stage with the Planning Authority.





# Drumlish Zoning Map

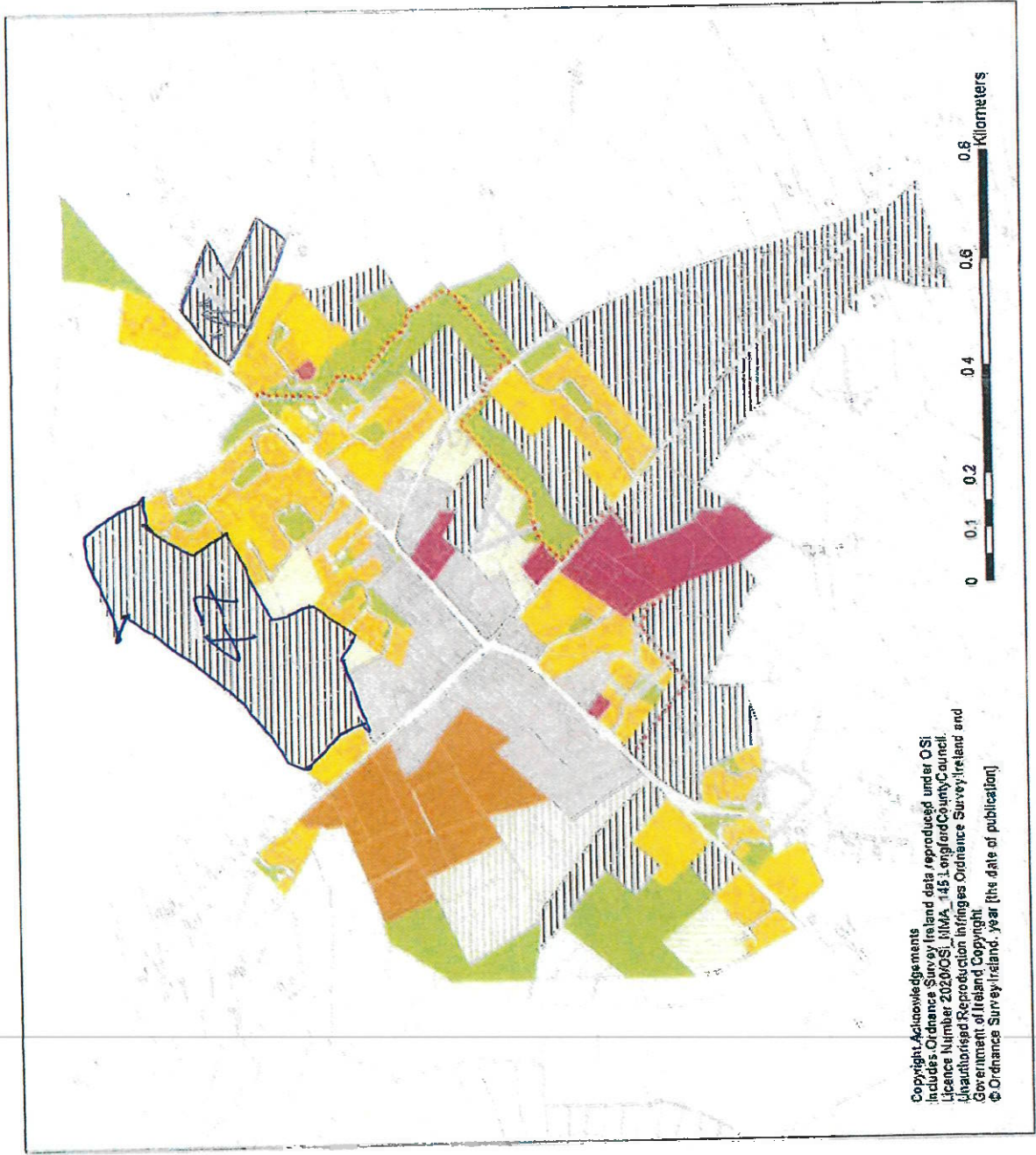
County Development Plan 2021-2027



**Legend**

- Industrial/Commercial/Waterhousing
- New Residential
- Recreation/Amenity/Green Spaces
- Residential
- Site Residual - Objective
- Social/Community/Education
- Strategic Industrial Reserve
- Strategic Residential Reserve
- Town Core
- Village Waylay

**Notes:** Please note that every effort has been made to include the latest version of Ordnance Survey mapping available. Changes on the accuracy of boundaries may be discussed and addressed at pre-planning stage with the Planning Authority.



Copyright Acknowledgements  
 Includes Ordnance Survey Ireland data reproduced under OSI  
 Licence Number 2020/OSI\_01/MA\_1463, Longford County Council,  
 Unauthorised Reproduction Infringes Ordnance Survey Ireland and  
 Government of Ireland Copyright  
 © Ordnance Survey Ireland, year (the date of publication)