

Annahale
Castleblayney
Co. Monaghan
16/05/18

RE: MONAGHAN COUNTY DRAFT DEVELOPMENT PLAN 2019-2025

Castleblayney Town (Map CYDP1)

FAO: Planning Section, Monaghan Co.Co.

Background

I am a landowner of property on the Dundalk Road, Castleblayney. I have attached a map illustrating the extent of my landholding. There were three large poultry houses, twelve mushroom tunnels, stables, hayshed and ancillary stores on this site at Annahale. There were up to twenty people employed on the site throughout the 1960-2000s, for over fifty years. The poultry farm predated most of the residential developments in Annahale along the Dundalk Road and Old Bog Road. Following my retirement over ten years ago, the site was left in a derelict state, and I cleared it to protect the visual and residential amenities of the area in Annahale which was welcomed by Monaghan County Council

Existing Development Plan

Currently the site is a brownfield site surrounded by residential developments. It is zoned in the current development plan for the town as *Strategic Residential Reserve*.

I note Strategic Residential Reserve zoning objective states that this objective is to ensure that lands that are not considered necessary for residential development during the period of 2013-2019 are protected for future residential use. Furthermore, it states under the relevant section of the plan 8.3.4

The development of these lands during the period 2013 to 2019 will only be considered where more than 75% of the proposed residential lands have been developed. However the development of these individual parcels of lands will be dependent on factors such as location, accessibility and existing infrastructure. It is an objective of the planning authority to ensure that lands zoned as strategic residential reserve are reserved for future housing. Consequently, any development that would prejudice the principal zoned use of these lands for urban residential expansion in the future will be resisted.

Draft Development Plan

It is noted the prevailing zoning objective *Strategic Residential Reserve* is to be maintained on my landholding in the new development plan which will be effective during the years 2019-2025. Accordingly, the plan's policy is *to protect lands that are considered strategic in location for the future residential development* of the town. Furthermore it states under Table 9.3 of the Draft Plan, that

Principal permitted use is residential. The comprehensive development of these lands will only be permitted in instances whereby 75% of the proposed residential lands have been developed. Any development which would prejudice the principle use of these lands for urban residential expansion in the future will be resisted.

According to the Draft development plan the following is classification of a Brownfield site:

15.2.4 Brownfield Sites

Brownfield sites are classified as any land which has been subjected to building, engineering or other operations excluding temporary uses or urban green spaces. These sites generally comprise of redundant lands and/or buildings, and the redevelopment of these sites has the potential to revitalise areas by utilising the capacity of existing social and physical infrastructure and thus shall be encouraged.

My Request

I request that the zoning of my lands at Annahale be revised from Zoning Objective 5 Strategic Residential Reserve to Objective 3 Proposed Residential A.

Grounds for My Request

1. Conflicting Objectives in the Plan:

As stated earlier, the subject lands are a brownfield site. The lands hosted an industrial intensive farm in excess of fifty years. The farm predated the majority of the contiguous and surrounding residential developments at Annahale. The site is currently in a derelict state. The current and proposed zoning objective materially conflicts with other development plan zonings and objectives in the plan such as

UDO 5 To encourage the refurbishment and reuse of derelict buildings and development on derelict lands and infill sites in the towns

UDO 8 To promote compact forms of residential development such as infill and backland development and to ensure through the development management process that access points to backland areas are reserved or

adequate frontage is reserved to provide future road access, to enable comprehensive backland development.

Having regard to existing residential developments contiguous to the subject landholding, the indepth residential development south-west of the lands along the bog road and north east along the Dundalk Road, and the multitude of one off housing along both roads, the subject landholding is an infill site, and located to the back of a number of dwellings. In addition, the existing pattern of development in the area is residential. The sustainable and sequential residential development of Castleblayney should be focused on existing derelict serviced infill/ brownfield/ backlands lands within the town boundary.

2 Unreasonable Zoning Objective:

In the Written Statement of the draft development plan the zoning objective relating to the landholding is Strategic Residential Reserve states it is policy to protect lands that are considered strategic in location for the future residential development of the town. In addition, Principal permitted use is residential. The comprehensive development of these lands will only be permitted in instances whereby 75% of the proposed residential lands have been developed. Any development which would prejudice the principle use of these lands for urban residential expansion in the future will be resisted. Therefore, in practice during the lifetime of the plan, any development proposal for housing on the lands will be considered premature during the lifetime of the Plan, and any development proposal for a different landuse on the site could be considered prejudicial to the residential development of the lands. Effectively, this zoning objective sterilises and prohibits any form of development of my lands which is a serviced brownfield site within the town boundary. This is totally unacceptable, unreasonable and contrary to the proper planning and sustainable development of the area.

Furthermore having regard to the various of lands given this zoning through the town of Castleblayney in the Draft Plan, I would be concerned for the future development of the town over the next six years in terms of residential development. There could be a multitude of constraints affecting lands zoned Residential A and B, such as ownership issues, financial limitations, access, and development control standards. The zoning objective **Strategic Residential Reserve** is too restrictive in terms of developing the lands zoned. Having examined Table 8.1 the Zoning Matrix associated with the zoning objectives of the Plan, **SR** zoning objective does not include one single development type is 'Acceptable In Principle'. I may add these SR zoned lands are prime strategic lands within the town boundary most of which are

serviced lands. This is unacceptable and defies all sustainable urban and town planning principles.

3. Unprecedented Level of Industry/ Enterprise/ Employment

The blanket zoning of lands to the west and north of Castleblayney town is noted. It would appear on paper to be an unbalanced, unsustainable and unrealistic amount of land zoned for such land use in a small town. The amount of land zoned could cater for the entire County of Monaghan in terms of Industry and Employment. In the unlikely event that such zonings were realised during the lifetime of the development plan, where would the employees reside having regard to the restrictive residential zoning objectives in the plan. Realistically they would have to commute from other towns generating unsustainable traffic movements.

According to the government publication **Development Plan Guidelines** (DOE 2007);

The process of setting objectives for the zoning of land must seek to get the right balance between:

- (a) Making sure that enough land is being zoned so that the development needs of the economy and society in the area in question over the plan period and for a reasonable period beyond can be met; and
- (b) Avoiding the zoning of too much land and thereby creating a situation where priorities for development are not clear and where as a result it is difficult to secure an orderly and progressive approach to the development of that area, particularly in the matter of providing essential services such as roads, drainage, social infrastructure and amenities.

Having regard to the blanket zoning of lands to the west and north of Castleblayney, the development plan does not have clear priorities for the development of such lands and will result in the disorderly development of these lands. Whereas it is clear, the pockets of lands zoned Strategic Residential Reserve, represent the orderly and progressive development of the town, however the underlying zoning objective prohibits any development of the lands for residential use. Again, conflicting zoning objectives relating to different land uses is noted and in my opinion, will result in stagnating the growth of the town during the plan period

RECOMMENDATION

Having regard to:

- the former land use associated with the subject landholding for five decades;
- the current derelict state of the landholding
- the policies relating to infill/ backland and brownfield sites in the draft plan
- the contiguous in-depth and one-off housing
- general pattern of development in the area
- the serviced lands
- the moratorium to all future development proposals created by the wording of the zoning objective during the lifetime of the Plan
- the current national housing crisis
- the level of lands zoned for Industry/ Enterprise/ Employment

it is requested that the current zoning objective for my lands **Strategic Residential Reserve**, be revised to **Proposed Residential A** -*To provide for new residential* **development and for new improved ancillary services.** This material revision would comply with other relevant policies in the development plan. This would create a more consistent and co-ordinated planning approach for Castleblayney.

I look forward to hearing from you on this issue and I hope for a favourable outcome.

Yours sincerely,

Janette Coogan

