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Submission Document Proposed Land Zoning, Kinlough, Co. Leitrim Draft Leitrim County Council Development Plan

Client: Mr Charles Fergus – EMERALDWELL LIMITED

Date: 25/04/2022

Our reference: BA 112

Introduction

I wish to make a submission on behalf of my client regarding the draft Leitrim Development Plan currently on display for public consultation.

It is proposed in the plan to rezone an area of land owned by my client from residential to agricultural.

Main Body

In the draft County Development Plan it is proposed to rezone a section of land owned by my client in Kinlough from residential to agricultural land.

My client has constructed 84 foundations for new houses that received planning permission (PL 041696). The planning permission was for 84 houses. 25 houses have been constructed to date and significant works have commenced on the 59 remaining sites. The sites are serviced with basic infrastructure.

It is estimated that my client's investment to date is in the region of €7-8m.

The design and construction of the foundations was quite complex as the ground required piling and ground beams to support hollowcore slabs and superstructures, thus incorporating a significant amount of concrete

Given the significant amount of concrete poured and utilised to date, it would be unsustainable to remove the foundations and try to return the area back to grassland for farming purposes. Environmentally, the best use of the land would be for the development initially proposed and approved to be completed.

Currently there is a severe shortage of residential accommodation on a national level with housing demand high in Kinlough. Census data from 2016 shows the population of Kinlough being 1032 with 170 temporarily absent/ unoccupied holiday homes, / vacant dwellings. In comparison, the 2011 Census data had a population of Kinlough of 1018. It is estimated that the population of Kinlough is 1054 today based on previous data, however no allowance has been made to support the current housing crisis and decentralisation as a result of the coronavirus pandemic.

My client is regularly contacted from prospective property buyers and voluntary housing organisations about the estimated completion date of the housing estate.

As illustrated in Figure 1 & Figure 2, significant works have been undertaken to date on the site.



Figure 1- Satellite view of the land.



Figure 2- Satellite view of the town

As shown in figure 3, the site had a previous planning permission granted for residential development which has been acted upon. There appears to be an issue with the eastern boundary of the planning area i.e. part of the site is not contained in the planning area coloured blue.



Figure 3- Planning layer map from Leitrim County Council Website.

Figure 4 shows the current zoning of Kinlough which encompasses my clients 'land as "Primarily Residential". Similarly, there appears to be an issue with the eastern boundary of the site as the area zoned for residential development does not include the entire development



Figure 4- Previous and current zoning map of Kinlough

The land in question is owned by my client and the draft County Development Plan is proposing to have multiple land zonings across the site.

Figures 5-7 are extracts from land direct shown the folio numbers and plot areas.

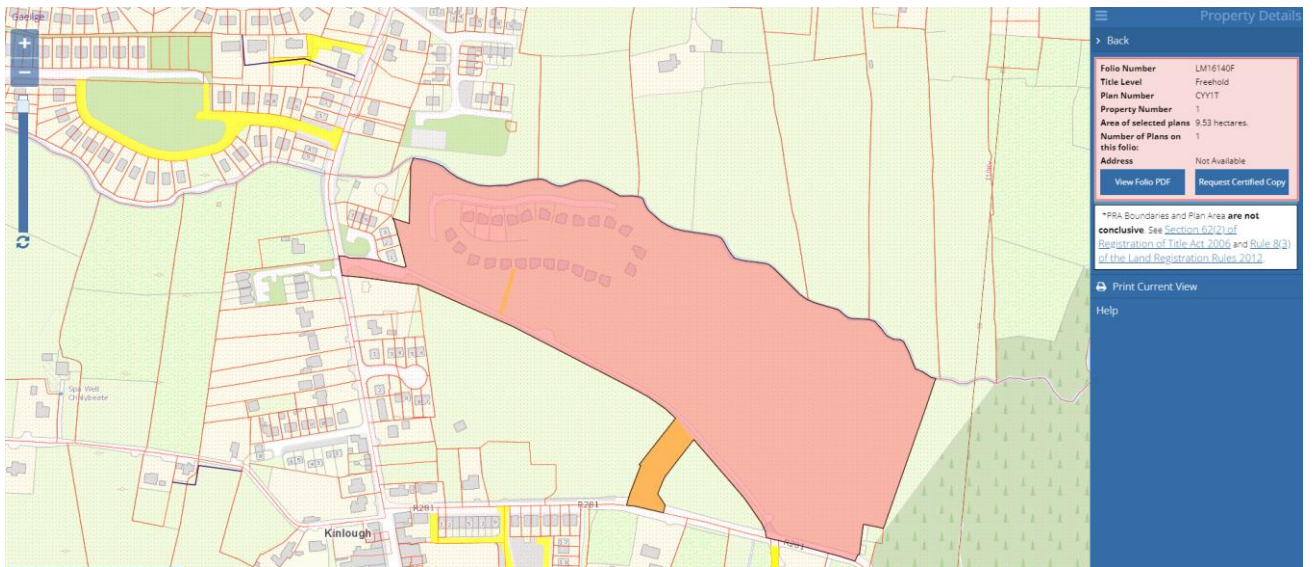


Figure 5- Land Direct Details of the land in question.

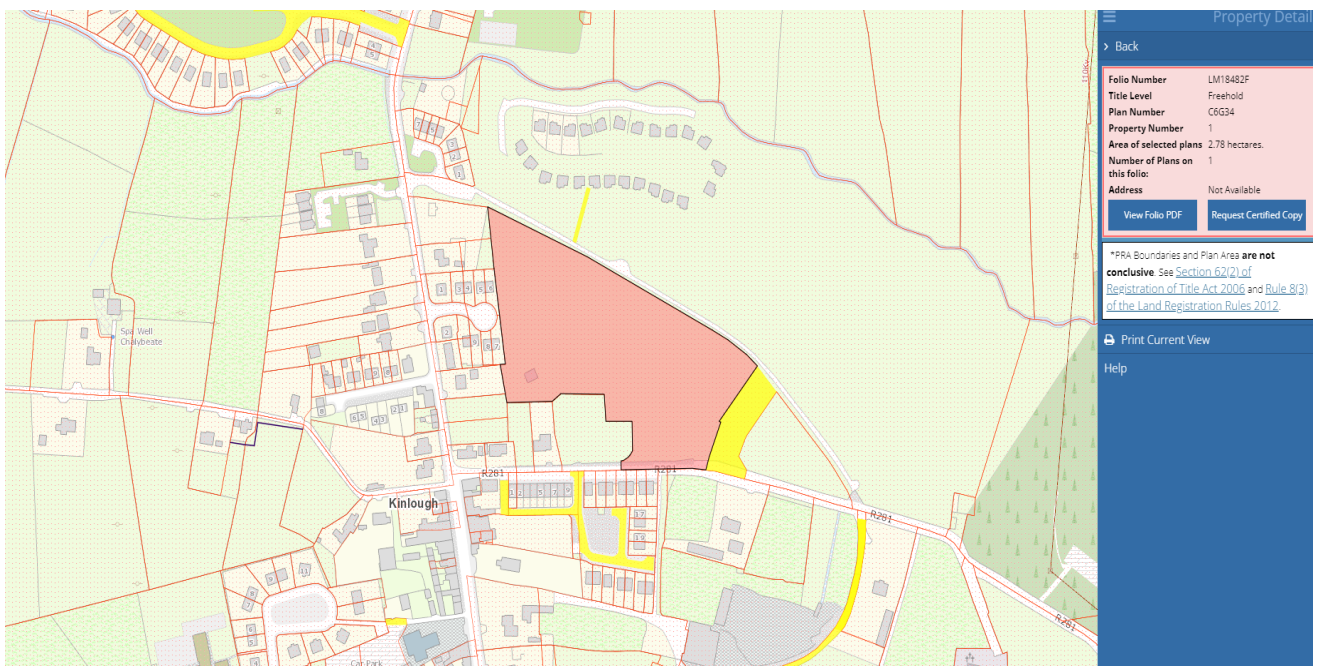


Figure 6 Land Direct Details of the land in question.

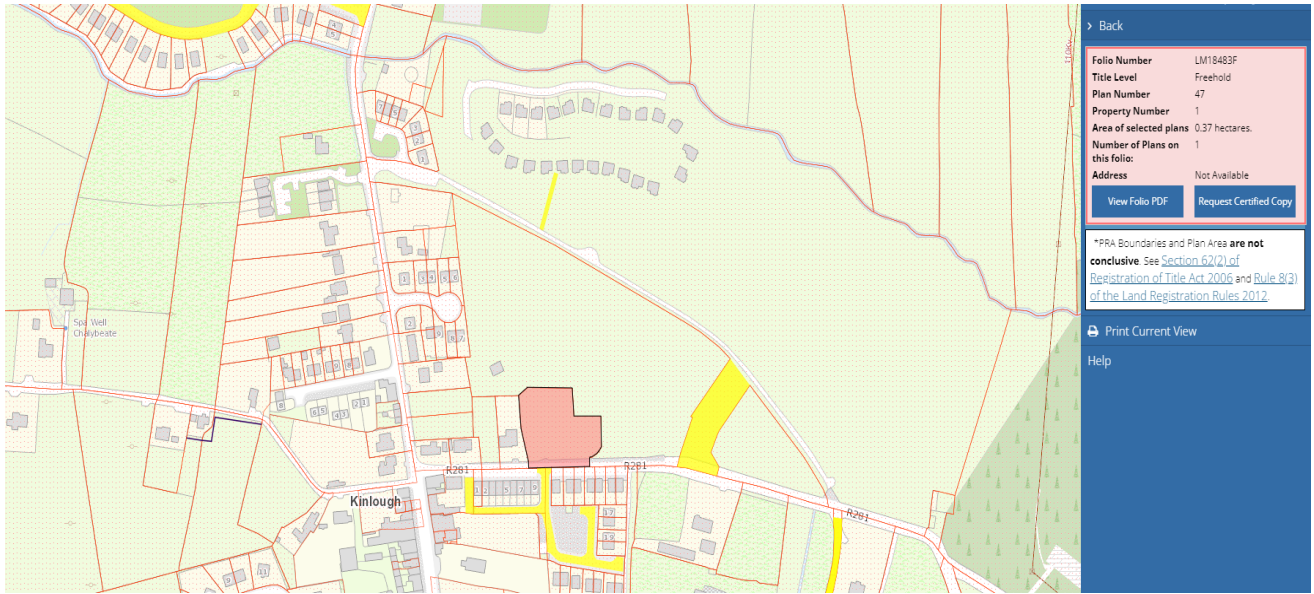


Figure 7 Land Direct Details of the land in question.

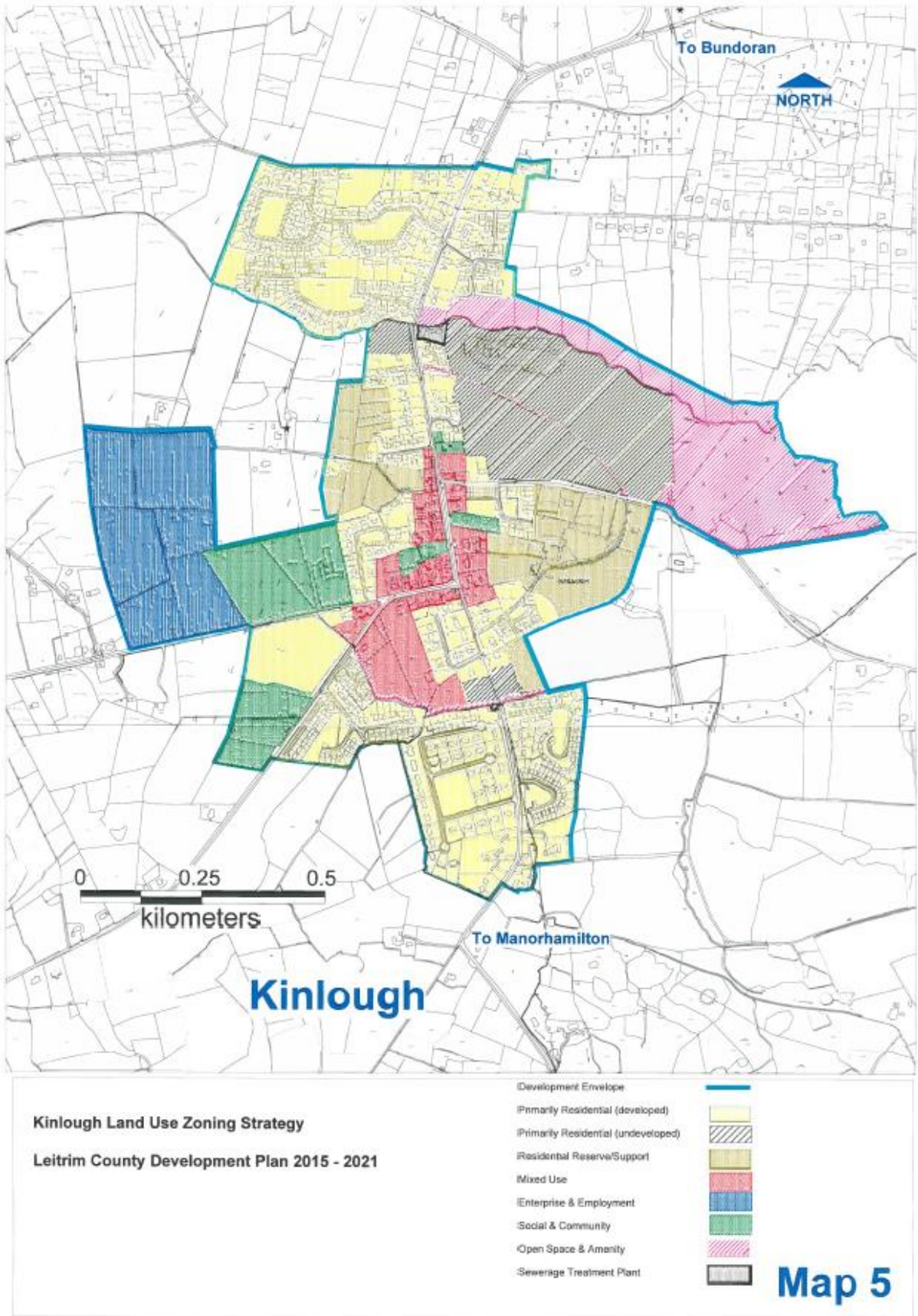
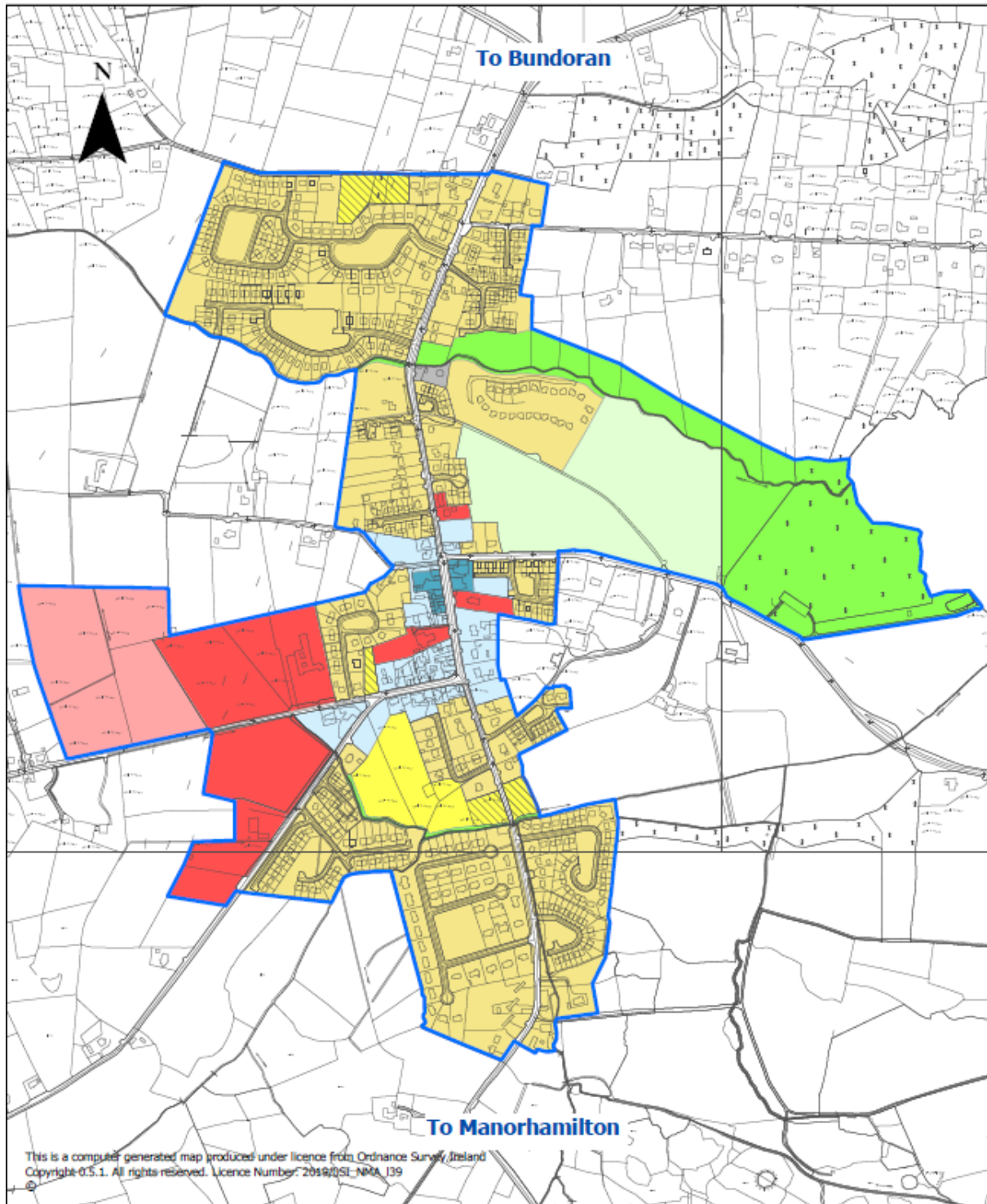


Figure 8- Current zoning map

Shown in figure 9 is the draft land zone proposal for the Leitrim County Development Plan for Kinlough. As can be seen, it is proposed to zone part of it residential and part of it agricultural even though the land lies within the development envelope of Kinlough.



<p>Legend</p> <ul style="list-style-type: none"> Existing Residential New Residential Town/Village Centre Mixed Use Tourism Social & Community Open Space Utilities Development Envelope Low Density Residential 	<p>Map No. 22</p>	<p>Produced by Planning Department, Leitrim County Council, Aras an Chontae, Carrick-on-Shannon, Co. Leitrim</p>	
	<p>Kinlough Land Use Zoning Map</p>	<p>Leitrim Draft County Development Plan 2023-2029</p>	 <p>Comhairle Chontae Leitrima Leitrim County Council</p>

Figure 9- draft zoning Map

Finding

The proposal to unzone circa 66% of this land bank is outrageous. This is no longer a green field site. Instead, it is a construction site with house bases and hardcore roads insitu. The embedded energy and finances spent to date are both huge.

On the embedded energy side, it is essential that construction materials are not wasted on a mass scale. The presence of the bases and infrastructure means that the land can not be safely grazed or used for any worthwhile environmental project. While the bases are left incomplete concrete leeching will occur which will eventually end up in Lough Melvin.

Leaving the site to grow wild is not an acceptable environmental option. It will only lead to disorder in what hereto fore was forestry/peaty land.

The option of moth balling this development will produce no environmental or planning gain. Instead, it will make the completion of the 25 houses unviable for the following reasons:

1. The financial model for this estate demands that the costs for the infrastructure and services are divided across 84 houses
2. The site can only be rehabilitated and landscaped when the entire development is complete

The Location of the site:

1. The lands are located adjacent to the sewerage treatment plant and other essential services
2. They abut other substantial residential areas.
3. They abut a public roadway that includes good pedestrian facilities such as paths, lighting etc.

The area is scenic with lakes, parks and walkways on its doorstep.

There is only one other site proposed for domestic usage to the west of Kinlough/ Manorhamilton Road, however, this site has no reasonable quality of amenity space available to it.

The need for housing in Kinlough

At present, there is 100% occupancy of houses in Kinlough. There are no ghost estates in the town.

Kinlough needs more houses for both social and affordable needs. As Bundoran is also experiencing a shortage of affordable housing, people in the town are using Kinlough as a dormitory town, because it is a short commute away, and up until now availability of house at an economical price was an option.

The development of this site is strategically important to Kinlough for all the reasons stated. It defies logic that development lands adjacent to parks, the best lake in Leitrim, woodlands and children's playgrounds would be zoned back to agricultural. In recent times the developer has rehabilitated the houses on site and has expended a huge capital cost on reversing the dilapidation that occurred over the last fifteen years.

The viability of this development can only be guaranteed if the status quo on the development plan remains.

My Submission

In the interest of orderly and sustainable planning it is my opinion that the lands contained in Folio No.'s LM16140F, LM18482F & LM18483F should be zoned residential

Finally, there will always be a housing shortage until local authorities release sufficient lands in strategic locations to make developments sustainable.

It is difficult in a lot of circumstances to site housing developments in beautiful spaces but when such opportunities are available they should not be passed up under any circumstances.

Trusting this submission will receive favourable consideration.

I remain yours faithfully,

A handwritten signature in cursive script that reads "Michael Conmy". The signature is written in dark ink and is positioned above a horizontal line.

Michael Conmy
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