



**PLANNING SUBMISSION RE
LOUTH COUNTY DEVELOPMENT
PLAN 2021-2027**

In respect of

**LANDS AT KNOCKNAGORAN,
OMEATH, CO. LOUTH**

Prepared by

GENESIS PLANNING CONSULTANTS

On behalf of

**REPRESENTATIVES OF THE
ESTATE OF PATRICK MCCLUSKEY**

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Author: Ronan Woods

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1 INTRODUCTION

1.1 Purpose of Report

- 1.1.1 The Planning Authority is commencing the preparation of the County Development Plan (CDP) for the county to cover the period 2021 to 2027. The purpose of the CDP is to set out an overall strategy for the proper planning and sustainable development of the county.
- 1.1.2 Genesis Planning have been engaged by the client to examine and assess the existing policy context, zoning designations in Omeath and to prepare this submission to the Planning Authority on their behalf.
- 1.1.3 In terms of background our client is in ownership of the landholding currently in use for a caravan park in the Knocknagoran area of Omeath, and is currently examining options for moving the lands forward for development.
- 1.1.4 In preparing this submission we have undertaken an analysis of our client's lands in the context of the National Planning Framework, the 2015-2021 CDP and the Regional Spatial Economic Strategy for the Eastern and Midland Region (RSES).
- 1.1.5 The analysis undertaken by Genesis Planning identified a number of areas of interest which demonstrate that the subject lands are appropriate for rezoning from their current designation as 'Tourism and Leisure' to 'Residential' in the forthcoming County Development Plan for 2021-2027. These are set out in this report.

1.2 Background to Submission

- 1.2.1 Our client has engaged Genesis Planning to make a submission on their behalf to the Planning Authority on the draft County Development Plan 2021 – 2027, specifically in relation to their lands at Knocknagoran, Omeath, Co. Louth.
- 1.2.2 In totality the subject lands occupy approximately 3.76ha at Knocknagoran with direct access onto the R173 regional corridor which runs through the centre of Omeath Town.
- 1.2.3 This submission to the Planning Authority outlines proposals for the subject lands to be rezoned for residential use in the forthcoming CDP.

2 SUBJECT LANDS IN CONTEXT

2.1 Overview

2.1.1 A description of the landholding in Omeath is provided in this section.

2.1.2 In addition the planning background of the lands are outlined below.

2.2 Subject Lands

2.2.1 The subject lands occupy approximately 3.76ha in the Knocknoagoran area of Omeath. As per the Louth County Development Plan 2015-2021, Omeath is designated as a Level 3 Settlement: Small Town, with a population of 603 (2016, CSO data).

2.2.2 In terms of location the subject lands are located along the R173 regional transport corridor which connects Omeath Town with the adjacent urban areas of Carlingford to the south (7.7km), and Newry City to the north (11.3km).

2.2.3 At a regional context, Carlingford Lough has been identified as a 'Strategic Natural, Cultural and Green Infrastructure Asset' in the region, with the Carlingford to Newry estuary (which includes Omeath) recognised as an important corridor both environmentally and economically with its proximity to the Northern Ireland (and UK) economy.

2.2.4 At a local context the subject lands lie immediately adjacent to the town centre, identified in Figure 1 below. Also for reference figure 2 overleaf identifies the lands currently within and adjacent to the settlement envelope of Omeath Town.



Figure 1: Subject lands location in Omeath



Figure 2: Location of subject lands within Omeath

2.3 Current Planning Context

2.3.1 Under the current Louth CDP 2015-2021 the subject lands are not currently zoned or included in the settlement boundary of Omeath as indicated below (lands outlined in purple).

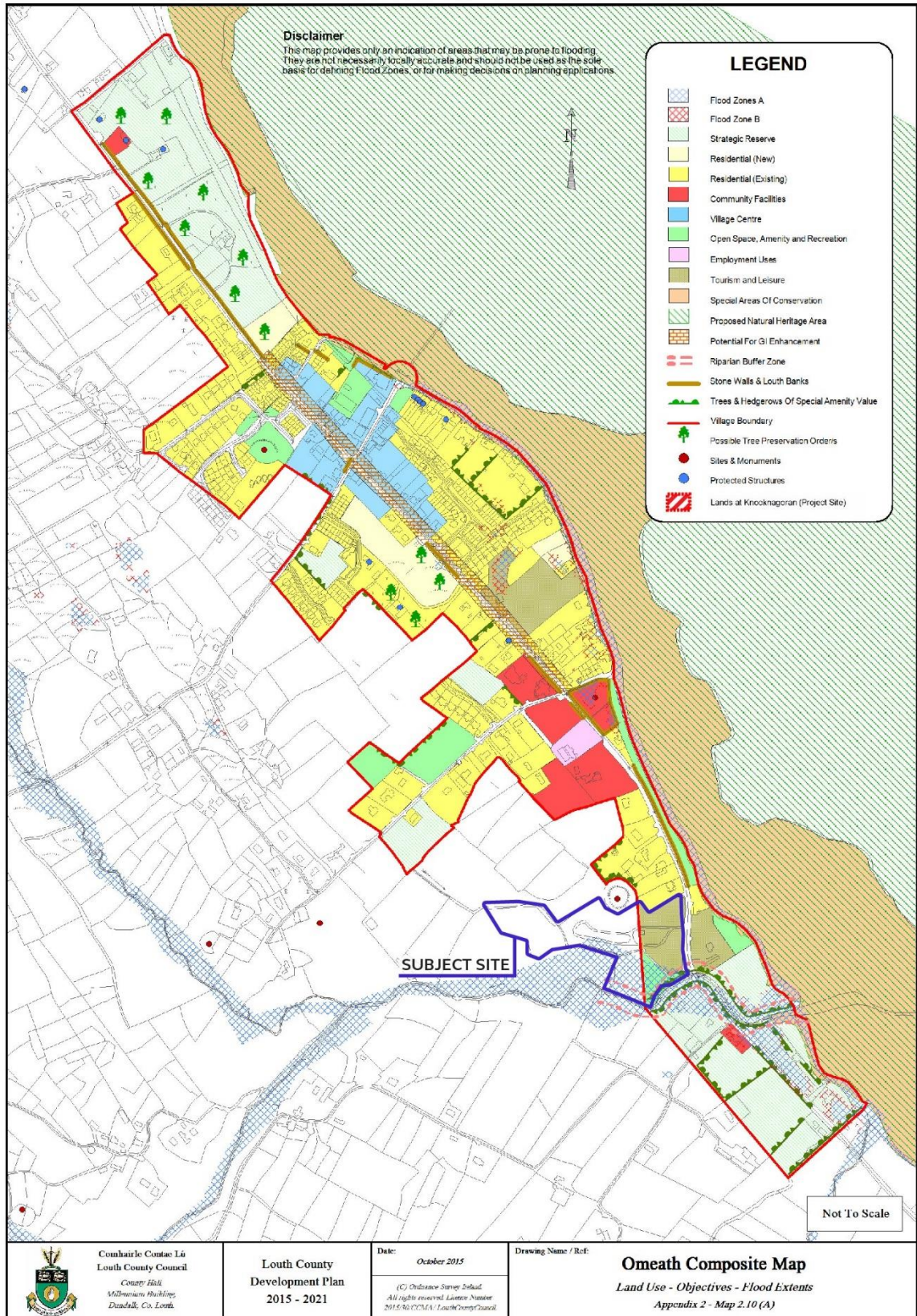


Figure 3: Omeath Zoning Map & subject site (Source: Louth County Development Plan 2016-2021)

2.4 Previous Planning Context

2.4.1 A review of the planning register identified a number of applications previously submitted in respect of the subject lands.

File Number	83390
Applicant Name	Patrick McCluskey
Application Date	01/01/1983
Development Description	Caravan Park
Decision (Date)	Not available

File Number	071860
Applicant Name	Patrick & Violet McCluskey
Application Date	15/11/2007
Development Description	Retention (R) for modifications to the layout of static and touring caravan pitches and to retain 21 pitches in addition to the 36 granted under planning ref. 93/ 418 with ancillary modification to the existing site services and sewage treatment works
Decision (Date)	Conditional Approval (05/08/2008)

Table 1: Previous planning applications for subject lands

2.4.2 In summary, previous applications are in relation to the subject lands partial use as a static and touring caravan site. Figure 4 below illustrates the layout submitted to Louth County Council as part of application 071860 which was conditionally approved.

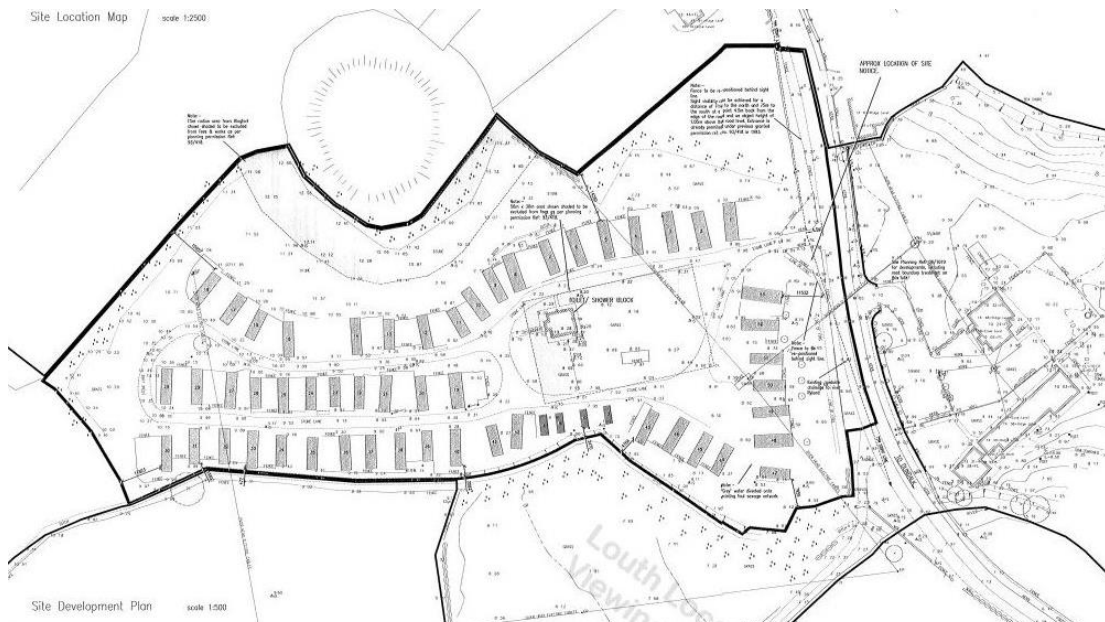


Figure 4: Static Caravan layout for application 071860

3 REVIEW OF CURRENT PLANNING POLICY CONTEXT

3.1 NPF

3.1.1 The National Planning Framework sets out strategic objectives which Planning Authorities are to have regard to. Specifically we highlight:

- Objective 3a *'To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements.'*
- Objective 3b *'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.'*
- Objective 5 *'To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity.'*
- Objective 6 *'Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.'*
- Objective 7 *'Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities'; and*

'Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth.'

'In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.'

- 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.'*
- Objective 15 *'Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.'*
- Objective 16 *'Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.'*

3.1.2 Of particular relevance is section 4.5 of the NPF which states:

'The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing

urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.'

3.1.3 Also of relevance is under appendix 3 of the NPF which sets out a tiered approach to zoning of lands. In summary:

- (I) Serviced lands should be identified;
- (II) Serviceable lands should be identified.
- (III) Contiguous lands should be identified

3.1.4 We submit the NPF sets out a clear policy direction for strengthening of existing urban areas and a move away from rural based one-off housing. Use of contiguous, sequential sites is advocated and the tiered approach to zoning of lands set out. Of particular relevance appendix 3 states that tier 1 serviced zoned lands *'will generally require the lands to [be] within the footprint of or spatially sequential within the identified settlement.'*

3.1.5 Of particular note is objectives 72a and 72b:

- *'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan'.*
- *'When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.'*

3.1.6 Planning Authorities through the plan process should identify serviced and serviceable lands and consider the same as a priority through the development plan process.

3.1.7 In response we submit the subject lands are appropriate for zoning as envisaged by the NPF given:

- The lands are serviceable;
- Objectives 3a, 3b, 5, 6, 7, 11, 15 & 16 of the NPF are complied with;
- The lands are brownfield and represent infill development as they are within and adjacent to the settlement boundary of Omeath.
- The lands are close proximity to the urban core of Omeath.

3.2 **Regional Spatial Economic Strategy – Eastern & Midland Region**

3.2.1 The RSES for the eastern and midland region sets out the strategic plan and investment framework aimed to *'shape future development and to better manage regional planning and economic development throughout the Region.'*

3.2.2 The RSES recognises the importance of the Dublin to Belfast economic corridor and the strategic function of this eastern corridor as a driver for regional economic development. As the largest economic agglomeration on the island of Ireland, the cities and towns along the corridor are home to a population of around 2 million people:

'Cross boundary coordination is a significant element of the Strategy and will be even more so with the onset of Brexit, playing a critical role in supporting economic growth and competitiveness.'

- 3.2.3 From 2006 to 2016 the Region grew by 15% - an increase of over 300,000 people – exceeding the state average growth rate of 12% over the same period. The Region contains some of the fastest growing communities in the Country which increases demand for housing, infrastructure and services in those areas.
- 3.2.4 Being located along the eastern corridor and close to the border with Northern Ireland, Omeath is strategically placed to benefit from the growth strategy outlined in the RSES, in particular its proximity to the northern city of Newry - the linkages with which are heavily referred to (most notably the Drogheda-Dundalk-Newry corridor) in the RSES.
- 3.2.5 In terms of the development strategy outlined in the RSES, it echos the NPF in that it states:
- *‘The key elements of the growth strategy identified at the national level, which set the parameters for the development of the RSES growth strategy include: A focus on contained growth and reduced sprawl by targeting infill and brownfield lands in existing built-up areas.’*
 - *‘Facilitating housing is paramount to ensuring the sustainability, vitality and viability of the rural places of the Region. Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth.’*
 - *‘A significant proportion of future urban development should be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.’*
 - *RPO 3.3: Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas.’*
 - *RPO 4.78: Development plans should support the development of a ‘New Homes in Small Towns and Villages’ initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create ‘build your own home’ opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.*
 - *RPO 4.83: Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.*
- 3.2.6 As the subject lands are strategically positioned within and adjacent to the settlement boundary of Omeath, it is clear the rezoning of the lands for residential use will be consistent with the objectives set down by the RSES, facilitating compact growth and offering a viable alternative to rural one-off housing.

3.3 Louth County Development Plan (CDP) 2015 – 2021

Overview & Context

3.3.1 The current Louth CDP sets out the strategic land use objectives and policies for the overall development of the county up to the year 2021, acting as a guide for those interested in pursuing development and to inform the general public as to how development proposals are likely to be assessed. The plan also informs the decisions of the Planning Authority in deciding the suitability of different types of development in the county.

3.3.2 In terms of settlement hierarchy, under the current CDP Omeath has been identified as a Level 3 – Small Town which have been identified as settlements which contain:

‘a satisfactory range of services such as schools, churches and shops and are serviced by public piped utilities. They are characterised by a high degree of self-sufficiency and the ability to cater for limited additional residential development subject inter alia to capacity within the foul drainage system and public water supply.’

Core Strategy

3.3.3 The core strategy of the CDP focuses on building strong urban centres and protecting rural hinterlands, in particular the preferred development strategy is aimed at building *‘Critical mass in the large growth towns of Dundalk & Drogheda, at the moderate sustainable growth towns of Ardee and Dunleer and at key small towns (Annagassan, Baltray, Castlebellingham/Kilsaran, Carlingford, Clogherhead, Collon, Dromiskin, Louth Village, Omeath, Knockbridge, Tallanstown, Termonfeckin, Tullyallen);*

3.3.4 Of specific relevance is policy CS2 of the core strategy the objective of which is:

‘To facilitate orderly and sustainable development in Level 3 Settlements for the duration of this plan, through the implementation of an overall phasing strategy’

3.3.5 Also worth noting is section 2.10 which refers to Level 3 settlements stating:

‘cognisance has been taken of the need to consolidate these settlements by keeping them as physically compact as possible and applying the sequential approach to land-use zoning.’

Settlement Strategy

3.3.6 The aim of this settlement strategy is to confirm the settlement hierarchy within the county, promote sustainable residential development within existing towns and villages and to make provision for sustainable housing in the rural areas of the county.

3.3.7 The Louth County Development Plan 2009-2015 set out a clearly identifiable five level settlement hierarchy, composed of both urban and rural settlements. This settlement hierarchy is based on factors such as size of population, range of services, the extent and range of community and other facilities available.

3.3.8 As stated previously Omeath is designated as a Level 3 settlement, policy objectives of reference within the settlement strategy include:

SS 9: To promote and facilitate limited development within Level 3 Settlements that is commensurate with the nature and extent of the existing settlement, to support their role as local service centres and to implement the policies and objectives relative to each settlement.

- 3.3.9 In response to the above, revising the zoning designation for the subject lands from 'Tourism and Leisure' to 'Residential' in the 2021-2027 CDP would be consistent with all relevant policies and objectives as identified in the current CDP, facilitating compact growth, encouraging better use of an under-utilized site and offering a viable alternative to rural one-off housing in the process.

Housing Strategy

- 3.3.10 The principle aim of a housing strategy is to ensure that the proper planning and sustainable development of the area of the Development Plan provides for the housing of the existing and future population of the county in an appropriate manner. Determining housing demand during the lifespan of the Development Plan is fundamental to the overall Housing Strategy.

- 3.3.11 Key principles of the housing strategy include:

- To promote socially balanced and inclusive communities in all housing areas across Louth,
- To provide for varying identified needs in the County with respect to housing typology, size and mix, and
- To monitor the housing strategy, allowing for adequate consultation with those who are central to the implementation of the policies of the strategy.

- 3.3.12 Key policies to note from the housing strategy include:

RES 2

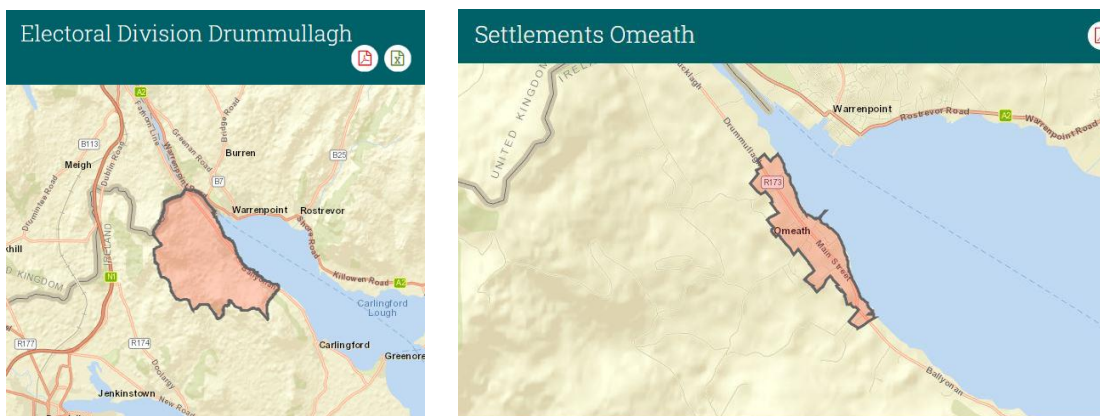
'...to enable every household to have available an affordable dwelling of good quality, suited to its needs, in a good environment and, as far as possible, at the tenure of its choice.'

RES 6

'To encourage and promote the creation of attractive mixed use sustainable communities which contain a variety of housing types and tenures with supporting community and residential amenities, and where Part V is visually and otherwise integrated into the overall development, thus counteracting undue segregation.'

3.4 Omeath Demographic Overview and Population Change

3.4.1 To demonstrate the population change in the local area we have reviewed CSO data for both Drummullagh ED and Omeath as below.



Figures 5 & 6: Drummullagh ED and Omeath Settlement as per CSO database (Sapmap)

3.4.2 For ease of comparison and to demonstrate population growth in both the Drummullagh ED and Omeath we have compiled relevant population change statistics for Co Louth and the state as recorded in CSO data.

Census Year	State	Co. Louth	Drummullagh ED	Omeath
2011	4,588,252	122,897	1,257	503
2016	4,761,865	128,884	1,356	603
% change	3.8%	4.9%	7.9%	19.9%

Table 2: Population change of the State, Co. Louth, Drummullagh ED and Omeath between 2011 and 2016 as derived from the CSO statistics.

3.4.3 As can be noted from table 2 the population of County Louth grew by 4.9% between 2011 and 2016, compared with the national increase of 3.8% and Drummullagh ED increasing by 7.9%. Omeath comparatively increased from 503 in 2011 to 603 in 2016 - a total increase of 19.9%.

3.4.4 On this basis the population growth experienced at both the electoral district level in Drummullagh (7.9%) and local level in Omeath (19.9%) has exceeded the growth in the state (3.8%) and the county (4.9%) during the same period.

3.4.5 Considering the figures obtained via the CSO are from 2011 to 2016, it is reasonable to assume the population growth of Omeath has/will have continued in this manner for the period of 2016-2021, and also going forward for the period 2021-2027.

3.4.6 By applying an increase of 19.9% to the population of Omeath from 2016-2021, it is therefore reasonable to assume by the end of the current CDP period the population would be 723 persons. (603 x 19.9% = 722.997).

- 3.4.7 Going forward if we apply the same principles to the projected growth for 2021-2027, it could be assumed by the end of the next CDP the population of Omeath would be close to 867 people ($703 \times 19.9\% = 866.87$). This represents an anticipated increase in population of 144 people in Omeath from the year 2021 to 2027.
- 3.4.8 On this basis applying the occupancy rate of 2.4 people per household, the anticipated demand for dwelling units in Omeath will be approximately 60 units during the updated plan period from 2021-2027, around 10 new units per annum minimum.
- 3.4.9 Assumming a density of 15 dwellings per hectare¹, this would represent a gross land area of 4 hectares required to accommodate the total number of dwellings required to house the anticipated future population of Omeath.
- 3.4.10 Further, having regard to policy provision under objective 19 of the NPF we note it states:
- ‘Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:*
- ‘In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements’*
- 3.4.11 Accordingly, with the Drummullagh ED being an area designated as being under strong urban influence and given the policy context seeks to direct housing to existing settlements we therefore consider the future housing demand/zoned land requirements in Omeath should also accommodate persons from the rural hinterland; i.e. Drummullagh ED.
- 3.4.12 Accordingly, on the basis of Drummullagh ED having experienced a 7.9% growth rate between 2011 and 2016, this growth in population is likely to require a minimum 48 no. additional housing units between the period of 2021-2027.
- 3.4.13 Therefore taking into account the growth in the rural hinterland population within Drummullagh ED of 48 units then the requirement for housing units in Omeath rises further to a total of 108 or a combined land area of 7.2ha.
- 3.4.14 In this context, it is clear the revised zoning of the subject lands to residential will help accommodate some of the projected residential growth of the town, whilst being consistent with the objectives set down by the national, regional and local policy.

¹ As defined for village locations under the Guidelines ‘Sustainable Residential Development in Urban Areas’

3.5 Housing Type and Vacancy Rate

	Louth Co. Permanent Dwellings	Louth County %	Omeath permanent dwellings	Omeath %	State Permanent dwellings	State %
Occupied	45528	88.57%	242	71.4%	1,707,453	85.22%
Temporarily absent	1158	2.25%	8	2.4%	50,732	2.53%
Unoccupied holiday homes	761	1.48%	42	12.3%	62,148	3.10%
Other vacant dwellings	3952	7.68%	47	13.9%	183,312	9.15%
Total	51399	100%	339	100%	2,003,645	100%

Table 3: Occupancy rates of existing units (source: census 2016)

- 3.5.1 Tables 3 above shows the housing vacancy rate at State level, at County level and also within Omeath respectively as per CSO data in 2016.
- 3.5.2 On review it is noted the percentage of vacant dwellings at County Level is extremely constrained with 88.57% of permanent units occupied.
- 3.5.3 In terms of Omeath of particular note is the high % of both holiday homes and other vacant dwellings (second homes). On review we consider this is reasonably attributed to the fact that Omeath has a large percentage of unoccupied second/holiday homes.
- 3.5.4 On this basis it is reasonable to assume therefore that both the unoccupied holiday homes (12.3%) and temporarily absent dwellings (2.4%) represent the stock of second homes in Omeath, equating to 14.7% of the total housing stock.
- 3.5.5 Accordingly we consider that only 13.9% of the existing available housing stock was available/vacant for permanent 'residential purposes' as per the 2016 census. Therefore, with a recorded a occupancy rate of 86.14% in 2016 this demonstrates that Omeath has lower rate of available units than the rest of the country, which has an 85.22% occupancy.
- 3.3.6 In this context, having regard to any population increase in both Omeath and Drummullagh ED since 2016 and the relatively low number of new dwellings constructed as a whole during this period it would suggest a clear need for additional land for new housing development to be allocated within Omeath.

3.5.7 Furthermore, at a county level it is noted from recent figures that the vacancy rate in County Louth is now recorded at an extremely low rate of 3.7%².

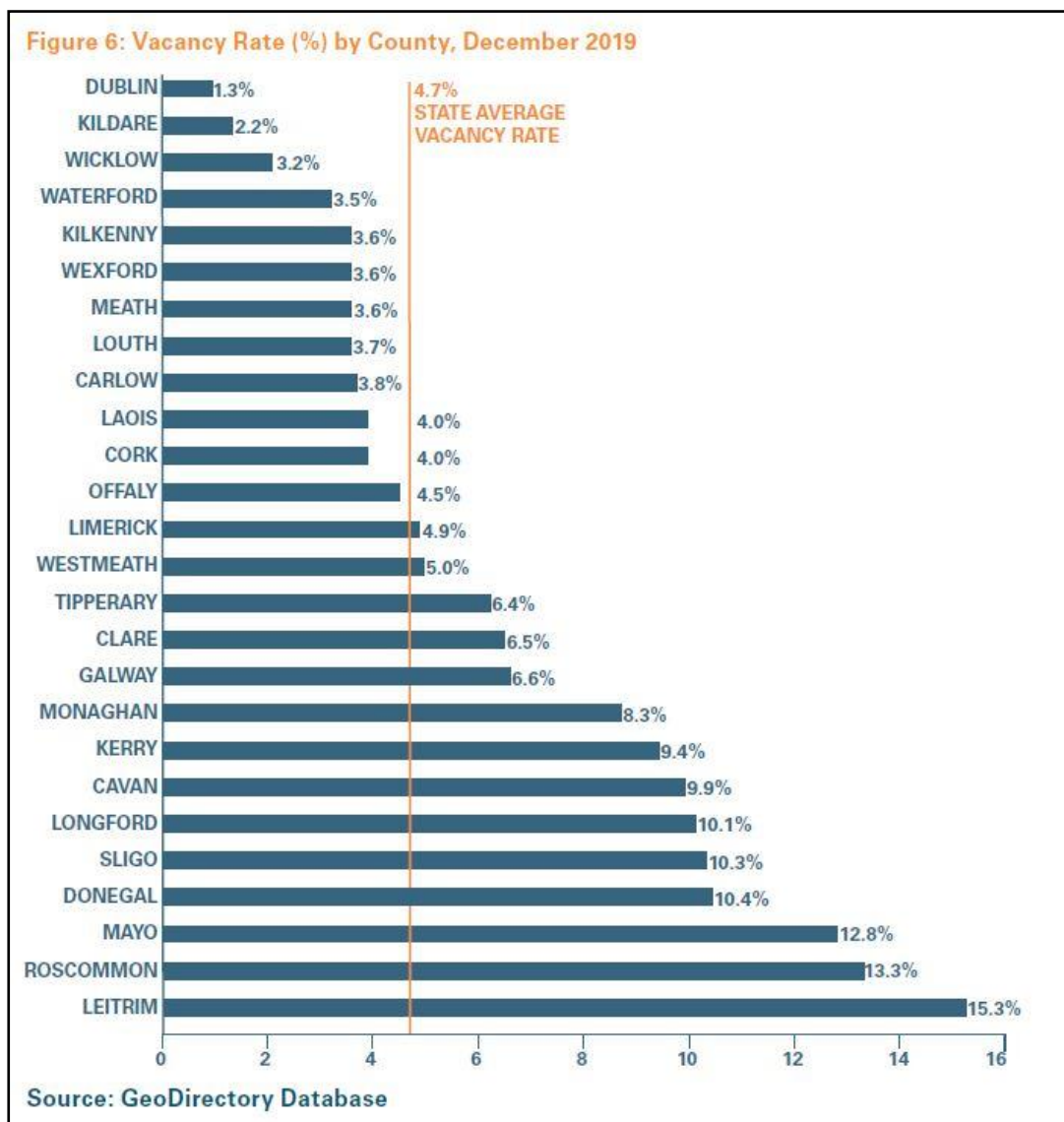


Figure 7: Extract from www.geodirectory.ie; vacancy rate of housing stock by county

3.5.8 Also, in terms of existing apartment numbers it is noted that apartments form a low overall percentage of the housing mix within the county, at only 4.6% of the total residential stock.

3.5.9 As the Planning Authority will note section 2.5 of 2018 apartment guidelines now also set clear policy for sustained increase in apartment unit provision, and state “Apartments may be considered as part of a mix of housing types in a given housing development at any urban location, including suburbs, towns and villages”.

3.5.10 On the basis of the above it is clear there is a need for more residential units, to include apartment units, to be provided to accommodate the growing population within County Louth, Drummullagh ED and Omeath.

² Geoview residential issue Q4 2019

4 HOUSING MARKET

- 4.1 The housing market in the county has shown significant growth in recent years, influenced by it's own population, economic growth and also by the overall demands being exerted for housing units both in County Louth and in the Greater Dublin Area.
- 4.2 As set out in section 3.4 of this report the rate of population increase in both Drummullagh ED and Omeath Town are higher than growth rates recorded at both County and State level. On review we consider it is reasonable to assume this represents the natural growth of Louth's population along with the ongoing trend to live within commuting distance of Newry, Dundalk and Dublin.
- 4.3 Also, as is evident in relevant publications and statistics there remains significant pressure on the housing market in the county, a consequence of being a more affordable and accessible alternative to living in Dublin City.
- 4.4 However, on review of CSO data for new dwelling completions it is noted that units constructed in recent years within the County still remains low, particularly for apartment unit provision, with the exception of Q3 and Q4 2019.

Louth	2017 Q2	2017 Q3	2017 Q4	2018 Q1	2018 Q2	2018 Q3	2018 Q4	2019 Q1	2019 Q2	2019 Q3	2019 Q4	2020 Q1
Single House	21	31	29	24	30	37	47	28	28	37	35	27
Scheme House	41	81	86	96	107	97	124	125	97	114	117	85
Apartment	1	2	5	5	16	4	15	19	9	33	54	2

Table 4 New dwelling completions in Louth, Type of Unit and Quarter (source: census statbank)

- 4.5 In terms of residential prices, the latest average price in County Louth is an asking price of €218,848 (October 2019), which is growth of 128% since the trough in April 2012 of €95,913.
- 4.6 It is clear these increases in prices are reflective of the existing demand to live in the county, as the increased demand in recent years is for both local buyers and from those buyers whose first preference would be to live in but due to affordability issues cannot afford Dublin City prices and as a result seek to reside in commuter areas.
- 4.7 In terms of transactions data from the CSO for 2019³ shows that 214 market transactions took place county Louth in December 2019, with an average asking price of €196,902. When compared to average county Dublin sale prices of €401,856 for December 2019 it is evident Louth is a more affordable housing option for purchasers. Also, market evidence suggests in the price range of €210,000 to €240,000 potential demand it at it's strongest, particularly for three-bedroom units.
- 4.8 Also, in terms of additional demand for residential units within the area, it is clear from the vacancy rates as set out in table 6 of this statement that only 13.9% of units in Omeath are vacant. As a whole we consider this is reflected in the designation of County Louth as a rent pressure zone since July 2019, which in turn correlates with

³ <https://statbank.cso.ie/px/pxeirestat/Statire/SelectVarVal/Define.asp?maintable=HPM04&PLanguage=0>

market evidence that a higher vacancy rate is required to avoid excessive increases in rents or purchase prices and ensure a housing market functions efficiently.

- 4.9 On this basis it is submitted the current lack of availability of units is demonstrative of a shortage of supply and there exists a clear need to provide additional residential units which are appropriate both in terms of unit mix and affordability for settlements such as Omeath.

5 SEQUENTIAL DEVELOPMENT OF LAND, SERVICES & CONNECTIVITY

5.1 The merits of the sequential approach in land use planning are well established.

5.2 In this regard, as the Planning Authority will note, the development of land for residential purposes is influenced by multiple factors such as services, availability, accessibility and existing infrastructure. A site may be in relative close proximity to the Town/Village Centre but due to the lack of existing infrastructure or other factors the site may not be developable during this plan period.

5.3 In response we submit the subject lands are an example of why the sequential test should examine each site in detail and not just look at its location as they are adjacent to existing services, infrastructure and strategically provide an opportunity to connect the wider community.

5.4 Specifically in response we highlight:

- The site is directly accessible from the existing road infrastructure
- The site is within walking distance of local amenities
- The site is serviceable
- The site is included within and contiguous to the settlement boundary of Omeath
- The site is sequentially the next available parcel of lands for residential development and also represents brownfield, and infill development.

5.5 We submit these attributes make these lands strategically important in the overall development of Omeath and therefore delivery of residential units should be considered as a priority in sequential terms, and suitable in advance of many other land parcels elsewhere in Omeath.



Figure 8: Aerial view of subject lands and local development surrounding the site

- 5.6 As per the Louth CDP 2015-2021 illustrated in Figure 3, we have reviewed the vacant lands within the settlement boundary of Omeath which are currently zoned for residential development.
- 5.7 Specifically, we note 3no. identified sites designated for residential may not be suitable or available within the proposed plan period for residential purposes. For reference we refer to figure 8 opposite.
- 5.8 As per section 3 of this report, we calculate:
- Approximately 4 hectares of residential land will be required in the upcoming plan period solely for Omeath's population forecast(s)
 - This figure rises to a combined total of 7.2ha when the rural hinterland is included see paragraph 3.4.9 specifically).
- 5.9 Therefore, our client's lands with a site area of 3ha can facilitate a large percentage of the anticipated future residential requirements in Omeath in the upcoming plan period (2021-2027) & also assist in meeting NPF objectives for housing in settlements rather than in rural areas.



Figure 9: Alternative sites in Omeath currently designated for residential development in the Louth CDP 2015-2021

6 RECOMMENDED LAND USE ZONING IN THE 2021-2027 COUNTY DEVELOPMENT PLAN

6.1 Recommended Zoning & Objectives

1. Zoning: To include the entirety of subject lands within the settlement envelope of Omeath Town in the 2021-2027 CDP, and designate as A2 New Residential.

Reason 1: To accommodate projected growth targets of Omeath and ensure there is sufficient and suitable lands reserved that could facilitate the orderly and sustainable development of the town.

Reason 2: To assist in meeting the NPF objectives set out in section 4.5 which states:

'The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.'

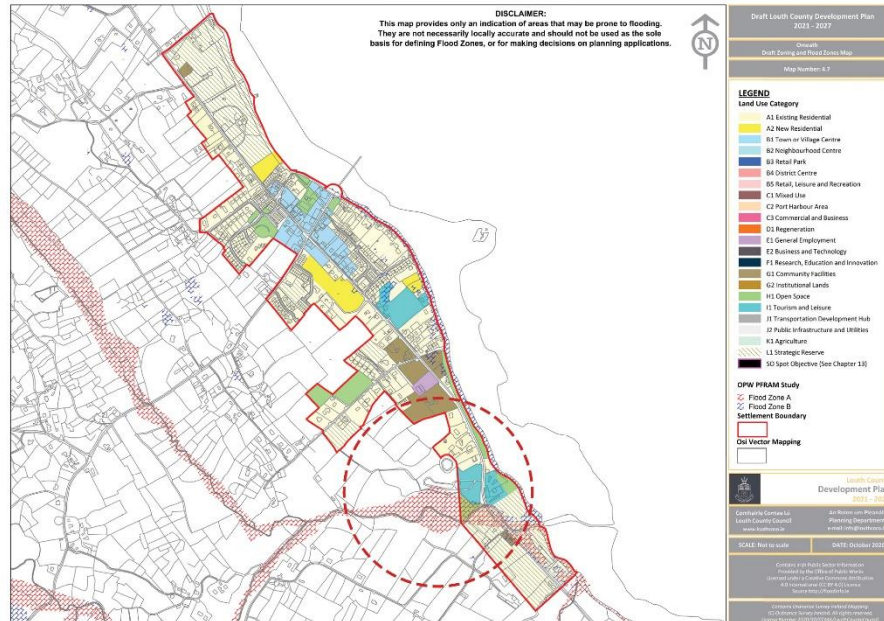
Reason 3: The subject lands are appropriate in terms of location for meeting the housing needs of the local area, which will also result in assisting in meeting the needs for social and affordable housing in the area.

2. Objectives: For policy objectives to be included in the 2021-2027 CDP to facilitate re-use of established brownfield lands to be prioritised on policy grounds for re-development proposals to enable re-development.

Reason 1: To encourage brownfield and infill development opportunities, in line with the NPF and RSES policy objectives and to achieve village and town renewal.

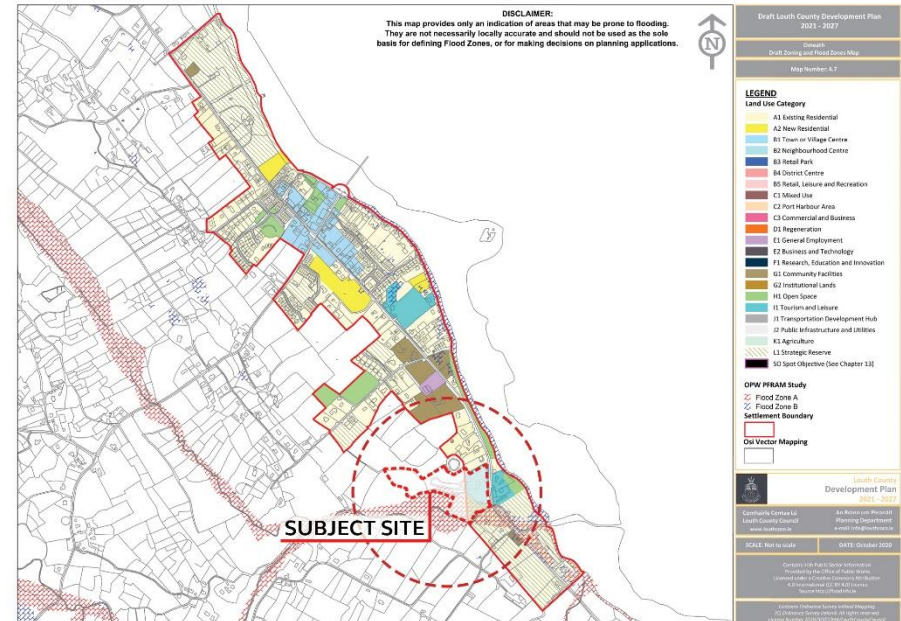
Reason 2: Provision of land for additional residential dwelling units will help accommodate population growth, strengthen village economy and reduce seasonal dependency on tourism.

Proposed Zoning - Draft 2021-2027 Louth CDP



6.2 The image above identifies the subject site (circled in red) located partially within the settlement boundary of Omeath, and zoned for 'I1 Tourism & Leisure' as per the proposed Draft Louth CDP 2021-2027.

Recommended Zoning - Draft 2021-2027 Louth CDP



6.3 Going forward we request the Planning Authority to include the entirety of subject lands within the settlement envelope of Omeath Town in the 2021-2027 CDP, and designate as A2 New Residential.

6.4 This is to accommodate projected employment growth of Omeath and surrounding areas, to ensure there is sufficient and suitable land reserved to develop necessary employment opportunities within and in the surrounding area, and to encourage brownfield and infill development opportunities in line with the NPF and RSES policy objectives and to achieve village and town renewal.

7 SUMMARY AND CONCLUSION

7.1 This submission relates to the parcel of lands as identified at Knocknagoran, Omeath, Co. Louth. In summary, this submission requests the following:

- **That the Planning Authority include the subject lands as outlined for inclusion in the settlement envelope for Omeath for residential development.**
- **Objectives: For policy objectives to be included in the 2021-2027 CDP to facilitate re-use of established brownfield lands to be prioritised on policy grounds for re-development proposals to enable re-development.**

7.2 This is on the basis that the entirety of the subject lands are appropriate for development purposes.

7.3 Relevant policy objectives under the NPF set out strategic objectives which provide clear policy support for strengthening of towns such as Omeath. We again highlight:

- Objective 3a 'To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements.'
- Objective 3b '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.'
- Objective 5 'To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity.'
- Objective 6 'Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.'
- Objective 7 'Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities'; and

- 'Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth.'

- 'In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.'

- 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.'*

- Objective 15 *‘Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.’*
- Objective 16 *‘Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.’*

7.4 Of note to our submission is section 4.5 of the NPF which states

‘The NPF targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village.’

7.5 At a regional level, the RSES also sets out objectives for small towns such as Omeath to be developed for residential purposes. In terms of the development strategy outlined in the RSES, it echos the NPF in that it states:

- *‘The key elements of the growth strategy identified at the national level, which set the parameters for the development of the RSES growth strategy include: A focus on contained growth and reduced sprawl by targeting infill and brownfield lands in existing built-up areas.’*
- *‘Facilitating housing is paramount to ensuring the sustainability, vitality and viability of the rural places of the Region. Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth.’*
- *‘A significant proportion of future urban development should be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.’*
- *RPO 3.3: Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’,*
- *RPO 4.78: Development plans should support the development of a ‘New Homes in Small Towns and Villages’ initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create ‘build your own home’ opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.*
- *RPO 4.83: Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.*

7.6 As the subject lands are strategically positioned adjacent to the village core of Omeath, it is clear the inclusion of the lands within the settlement envelope of Omeath will be

consistent with the objectives set down by the RSES, facilitating compact growth and offering a viable alternative to rural one-off housing.

- 7.7 For the purposes of this submission a desktop analysis of the latest figures has also been undertaken in order to understand both the demographic profile of County Louth, Drummullagh ED and Omeath to demonstrate the demand that exists for additional residential units in Omeath.
- 7.8 In summary we highlight the occupancy rate of 86.14% in Omeath is higher than the state figure of 85.2%. In more recent years (ie since CSO data in 2016) it is apparent this demand for residential units has only increased further, given County Louth is now classified as a rent pressure zone. Also, the most recent available data recorded by the Geo-Directory in October 2019 records the occupancy rate of County Louth to now be reduced further to only 3.7% of total housing stock.
- 7.9 As per section 3 of this report we calculate:
- Approximately 4 hectares of residential land will be required in the upcoming plan period solely for Omeath's population forecast(s).
 - This figure rises to a combined total of 7.2ha when the rural hinterland is included (see paragraph 3.4.9 specifically).

In response our client's lands with a site area of 3ha can facilitate a large percentage of the anticipated future residential requirements in Omeath in the upcoming plan period (2021-2027) & also assist in meeting NPF objectives for housing in settlements rather than in rural areas.

- 7.10 Therefore it is clear there is demand for additional residential units in Omeath and this demand is also supported by policy objectives at both the national and regional level.
- 7.11 Also in the context of the current housing strategy set out under the LCDP, we again highlight policies of relevance:

RES 2

'...to enable every household to have available an affordable dwelling of good quality, suited to its needs, in a good environment and, as far as possible, at the tenure of its choice.'

RES 6

'To encourage and promote the creation of attractive mixed use sustainable communities which contain a variety of housing types and tenures with supporting community and residential amenities, and where Part V is visually and otherwise integrated into the overall development, thus counteracting undue segregation.'

- 7.12 In response to both the current and the forthcoming housing strategy in the next LCDP (2021-2027) we submit the provision of residential units on the subject lands will be of clear benefit to Omeath. This clear opportunity the subject lands represents should be supported by the Planning Authority to meet residential demand for the area, and which will strengthen Omeath further, particularly in the context of socio-economic pressures posed by Brexit going forward.
- 7.13 We again highlight our review of existing sites within Omeath (section 5, figure 8) which demonstrates how existing lands within the settlement boundary are not appropriate to

meet the housing needs/land requirement for Omeath going forward, either due to restricted plot sizes or being curtilage(s) associated with protected structures.

- 7.14 In response the subject lands are to be recognised as appropriate and should be prioritised in terms of zoning for residential purposes by the Planning Authority going forward.
- 7.15 In this context we trust the Planning Authority will have regard to the contents of this submission in it's preparation of the Louth County Development Plan 2021-2027.
- 7.16 Going forward we welcome the opportunity to participate in all stages of the plan making process and we request that this submission be given full consideration in preparation of the forthcoming CDP in accordance with Part II Section 11 of the Planning and Development Acts.



Ronan Woods
Director