



Frank Pentony
Director of Services
Development Plan Review
Forward Planning Unit
Louth County Council
Town Hall, Crowe Street,
Dundalk, Co Louth.
A91 W20C

26th July 2021

RE: Draft Louth County Development Plan 2021 – 2027

Material Amendments

**Submission on behalf of Lorrac Developments Ltd, Thomas Meegan & Rita Meegan,
Imelda McGuinness and Clare McGovern in relation to lands at
Sandpit, Co. Louth**

Dear Mr Pentony,

With reference to the above, and further to your invitation to the public to make submissions in respect of the proposed Material Amendments to the Draft County Development Plan 2021 – 2027 for County Louth, please note that we have been appointed by Lorrac Developments Ltd, Thomas Meegan, Rita Meegan, Imelda McGuinness and Clare McGovern to make this submission on their behalf.

Please find attached contact details for our client separately as directed.

Background:

Our clients own lands on the southern edge of Sandpit as shown in the map below.

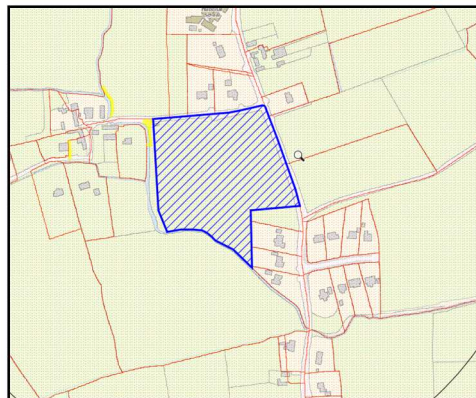


Figure 1 - Subject Lands

Since 2006 they have been actively trying to develop those lands, and the following sets out the planning history:

- Outline planning permission was granted on the subject lands for 12 houses under PD reference 06/208 and this has since expired.
- In 2008 we applied for retention permission of the partially complete site works and full permission to complete same for the 12 sites. Permission was granted under PD ref 08/522. The duration was extended under PD ref 13/68 and as such expired on the 27/07/2018.
- Full permission (Approval) was granted for one of the 12 houses, under PD Ref 09/58 but this permission was not enacted, and the permission expired on 14th May 2014.
- Full permission was sought for 12 houses, relying on the approved site development works (13/68) was sought under PD Ref 15488. This was refused for reasons associated with flood risk.
- Permission was sought for 6 houses in 2018 under Planning Reference 181008. This was refused for reasons associated with the quality of the flood modelling prepared with the application.

Since the last refusal in February 2019, we have engaged on our clients' behalf on numerous occasions with Louth County Council (Frank Magee, Brian Braniff and Patricia Hughes) regarding the preparation of a new planning application for the subject site. The scope of the flood modelling we have prepared has been extended and an approach has been developed and the engineering section of the council agree that it is possible to effectively deal with the historical flood issues.

We were in the process of getting that application ready to lodge in 2020 when the Draft County Development Plan was published. We became aware of the submission made by the OPR (Planning Regulator) in relation to rural settlements like Sandpit. Accordingly, we decided not to lodge the planning application until consideration of that submission had been made by the Chief Executive of Louth Co. Co.

We also made a Development Plan submission at Draft Stage on behalf of Lorrac Developments (DR 133) in relation to their interest in development of lands at Sandpit and Phillipstown. In following up on the submission, we became aware of the Draft Material Amendments which now seek to take the subject lands out of the settlement of Sandpit.

Proposed Material Amendments:

MV No. L5-12 seeks to extend the Settlement Boundary of Sandpit to the north to include a parcel of land within the settlement Boundary. MV No. L5-13 seeks to remove our clients' land from the settlement.

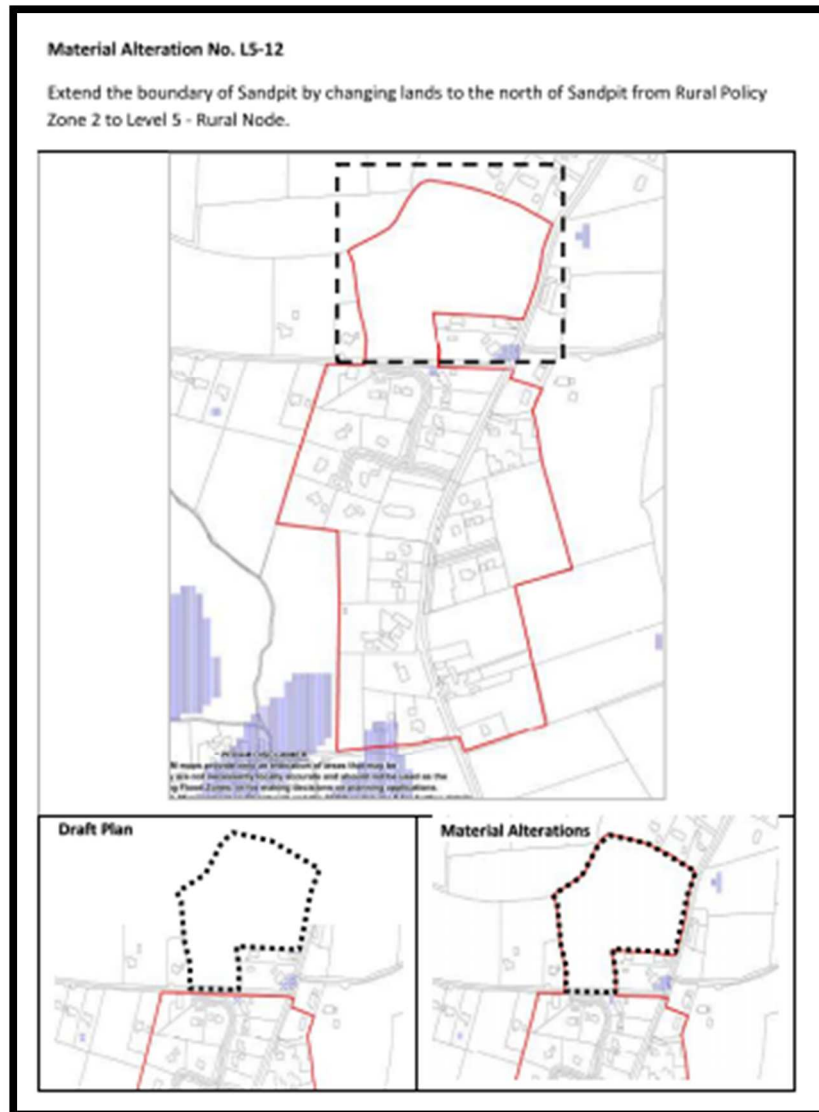


Figure 2 - Material Amendment L5-12

It should be noted that a submission (No. 657) was made on behalf of the owner of these lands at Draft Stage' seeking to have them added to the settlement and suggesting that my clients lands be removed. No contact with my clients was made by the landowner or his/her agents about this. No contact was made by LCC or any of the public representatives when the decision was made to remove my clients' lands from the settlement boundary.

Please see below the Chief Executive's response to this submission which recommend that no change be made – i.e. that MV L5-12 and 13 should not happen.

Chief Executive's Response:

The site is located to the north of Sandpit within Rural Policy Zone 2. It is acknowledged that there are some services and amenities within Sandpit including a National school, chapel, graveyard and local shop. And, whilst there is a group water scheme available, there is no access to mains waste water services.

As part of the strategy of strengthening the fabric of rural nodes and creating sustainable rural communities, the draft Plan has identified lands within the Rural Nodes that are suitable to meet rural generated housing needs. It is considered that there are sufficient lands which are appropriately located within Sandpit (to the east and south) to cater for any demand for housing which may arise of the Plan period. In addition there are opportunities to provide housing on infill and brownfield lands.

Furthermore, the site is located to the north of a local road which provides a definitive boundary to the settlement and its inclusion would result in sprawl detrimental to the overall character of the settlement and would be contrary to national and regional planning policy.

Chief Executive's Recommendation:

No Change

Figure 3 Chief Executives response to Submission 657

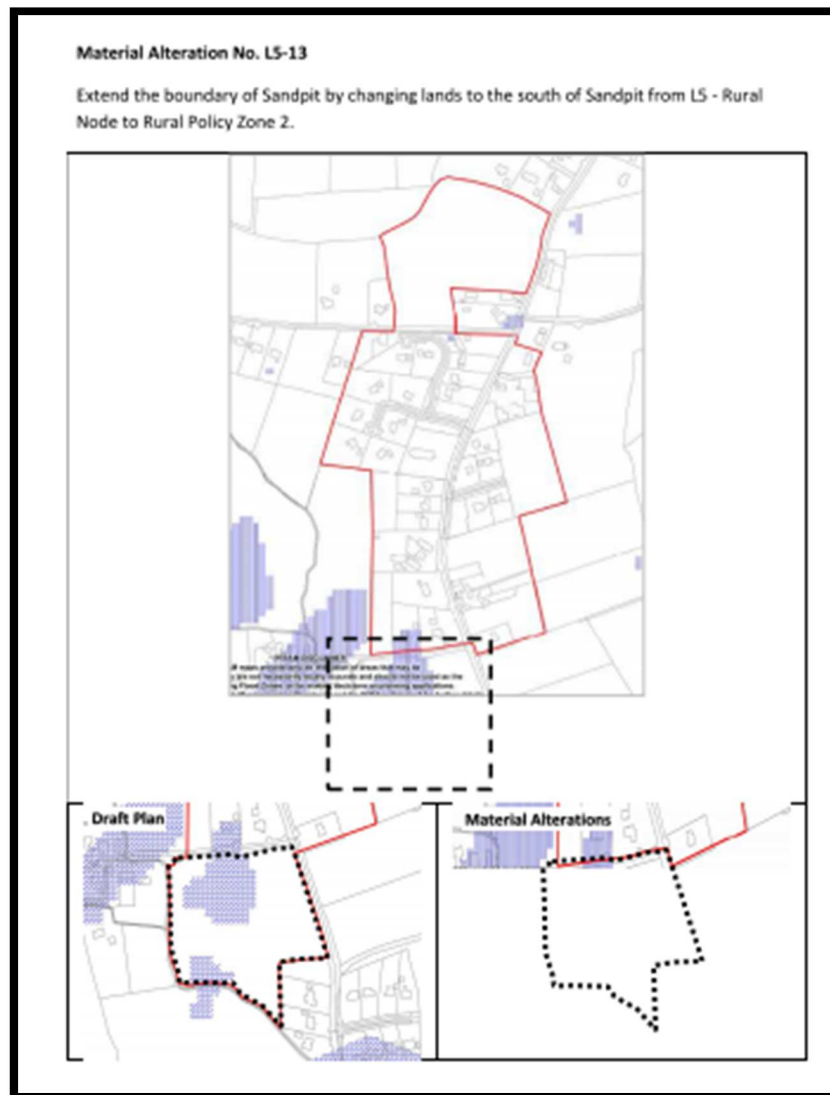


Figure 4 - Material Amendment L5-13

Requested Action:

We respectfully request that the proposed Material Amendment L5-13 be dropped and that our client's land remain within the settlement boundary.

We are not seeking that the lands subject to MA L5-12 be omitted, we believe that sandpit, with a primary school and shops within the village can support limited residential expansion within the village over the course of the plan period, and that such opportunities represent a more sustainable way of addressing rural housing needs than building in the open countryside.

We believe that the decision to remove our clients land from the development boundary without informing us was done to facilitate the inclusion of another land holding owned by a different owner. We believe this decision would not have been made had the elected representatives who made the decision known at that time of the extensive efforts that have been made by my clients to develop their land holding over a protracted period since 2006.

We further believe that there is no need to remove land from a Level 5 settlement boundary in order to add an additional portion of land. Inclusion within a Level 5 boundary is not the same as A2 zoning which would have core strategy and phasing implications. Lands inside a L5 settlement and outside it dip into the same unit allocation from a core strategy point of view.

Conclusion

In the interests of fairness, we would ask that the subject land be allowed to remain within the settlement boundary of Sandpit.

Yours Faithfully

Brian Hughes
BA BAI CEng MIEI,
Chartered Engineer

Submission prepared by:

Brian Hughes
Brady Hughes Consulting
26 Magdalene Street
Drogheda
Co. Louth

041 9839379
info@bradyhughes.com

On behalf of:

James Carroll, (enquiries@lorrac.ie) (086 2548299)
Lorrac Developments Ltd, Stameen, Dublin Road, Drogheda

And

Thomas & Rita Meegan
Tullyard, Ballymakenny Drogheda Co Louth (087 2664664)

And

Imelda McGuinness (086) 857 3669
Ardcalf, Slane, Co.Meath

And

Clare McGovern. Clare@mcgovernconsult.ie (086) 1744810
Kiltrough, Beabeg, Drogheda, Co.Meath