



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

17th December 2020

RE: Draft Louth County Development Plan 2021 – 2027

Submission on behalf of Lorrac Developments in relation to lands at Philipstown and 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 Draft County Development Plan 2021 – 2027 for County Louth, please note that we have been appointed by Lorrac Developments to make this submission on their behalf.

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

Background:

- Our client is a developer and landowner with interests in lands at Philipstown and Sandpit villages in County Louth, identified in figures 1 & 2 below.

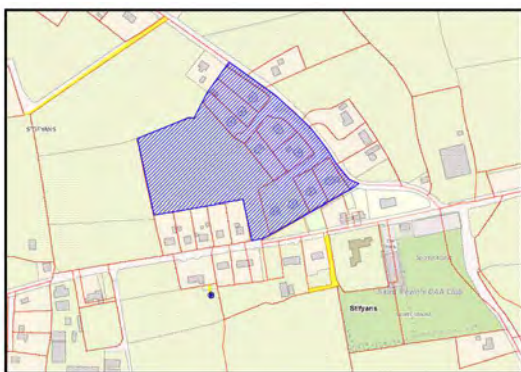


Figure 1 – Lands in Philipstown

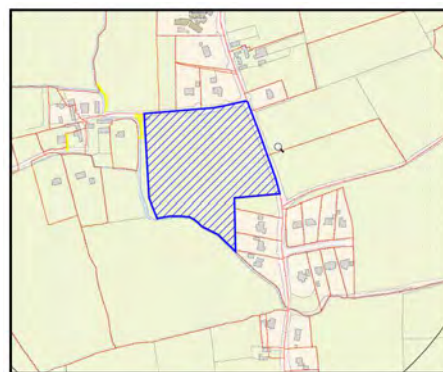


Figure 2 – Lands in Sandpit

- Both Philipstown and Sandpitt are identified in the Draft Development Plan as two of the 24 Level 5 Settlements within the county.
- Section 2.18 of the Draft County Plan describes these villages as follows:

2.18 RURAL VILLAGES

There are 24 Rural Villages identified in Level 5 of the settlement hierarchy. These villages are characterised by clusters of residential properties with limited local services and facilities. As part of the strategy of strengthening the fabric of villages and creating sustainable rural communities this Draft Plan has identified lands within villages that are suitable to meet rural generated housing needs. This Draft Plan supports the development of a 'New Homes in Small Towns and Villages' initiative advocated in Regional Policy Objective 4.78 of the RSES. This initiative

will involve a coordinated approach between Local Authorities, Irish Water and local communities in the provision of serviced sites in rural villages to meet local housing demand. This policy initiative will assist in strengthening and rejuvenating rural towns and villages throughout the County. Section 3.17.1 of the Housing Chapter provides further guidance on development in Rural Villages.

A Map of each of the Rural Villages can be viewed in Volume 2 of this Draft Plan.

Respectfully, we contend that the Draft County Plan fails to recognise the role that these villages play in the rural community as part of the fabric and identity of the county. These settlements are more than 'clusters of residential properties. Many have shops, schools, significant employers, pubs, crèches, churches, GAA clubs and playing facilities and other community infrastructure. Section 2.18 states that the Draft CDP has identified lands within villages suitable for meeting residential needs, but this is simply not true in many cases. In most cases, the settlement boundaries just include houses surrounding the village cores with no new development sites identified. The statement above says that the draft plan supports the 'new homes in small towns and villages initiative', but apart from saying this, there is no tangible effort to do this. Development in these villages has to be made easier if it is to be a real alternative to building in the countryside. The Draft Plan seeks to equate building a house in these villages with building a house in the open countryside. The unintended (we hope) effect of this will be to kill off all development in these villages as there is no incentive for 'native residents' to favour a site in a settlement over one in the open countryside closer to their qualify address/home place.

Issue No. 1 – Housing Policy Objective 42.

The Housing Policy Objective 42 of the Draft Louth County Development Plan 2021 – 2027 sets out the proposed criteria for applicants/occupants of new housing within these Level 5 Settlements.

Policy Objective	
HOU 42	To manage the development of new housing (including single dwellings and multi-unit developments) in Level 5 settlements by requiring applicants of new single dwellings or persons purchasing a property in a multi-unit development to demonstrate compliance with the Local Needs Qualifying Criteria as set out in Table 3.5.

Table 3.5 referenced above sets out the Local Needs Qualifying Criteria for those who want to build in the open countryside. In short, and to summarise, Table 3.5 allows for the

following people to build in the countryside (or live in a level 5 settlement, should the draft remain unchanged).

1. Farmers who need to live on their farm – it is unlikely that living within the settlement boundary of a level 5 settlement will meet this need.
2. A person whose business requires them to live in the rural area – again, living in a level 5 settlement will not meet this need.
3. A landowner who is a native resident – unlikely to want to build in a settlement in this instance – more likely to build on the land holding referred to.
4. A native resident (min 18yrs) who doesn't own a house seeking to build a house in the area – they must have lived for 18 years within 6km of the chosen site. There is no reason for them to move away from their family home site to a level 5 settlement when they qualify to build right beside (subject to site availability) their home place.
5. A returning emigrant who resided in the area (within 6km) – again, nothing to incentivise this person away from the open countryside and into a settlement.
6. People who need to care for an elderly relative – this category will need to build close to the relative and will only impact the category 5 settlements if the person requiring care already lives there (and if there's a site available).
7. People who need to live in rural areas for exceptional health reasons. I expect that in these cases, within a village may not be most appropriate.
8. Native Residents who are no longer in possession of a home due to various stated reasons. These people, like those at 3, 4 and 5 above are not incentivised into a settlement when they qualify just as readily to get permission closer to their home place.

In Philipstown in the last ten years Lorrac Developments have built ten detached properties on the subject site, averaging at one new build per year. We can confirm that none of the occupants of this development would meet the new criteria set out in Table 3.5 of the Draft Louth County Development Plan 2021 – 2027.

However, they have all complied with the local needs criteria as set out in the current plan and have strong connections to the county. They now have strong connections with the village and have children attending the local school and childcare facilities. Many are members of the local GAA team and are active members of the community. These new residents have managed to maintain the population levels in village and provide a counter balance to the ageing and dwindling rural population.

Issue 2 – Village Settlement Boundaries.

In most category 5 settlements, there are few if any available sites for residential development within the settlement boundary. In Philipstown, for example, there is literally no land identified for new housing. One seemingly vacant site in the north east of the village identified on the plan below already has permission and so the draft plan, if adopted will ensure that no further development occurs within the village until after 2027.

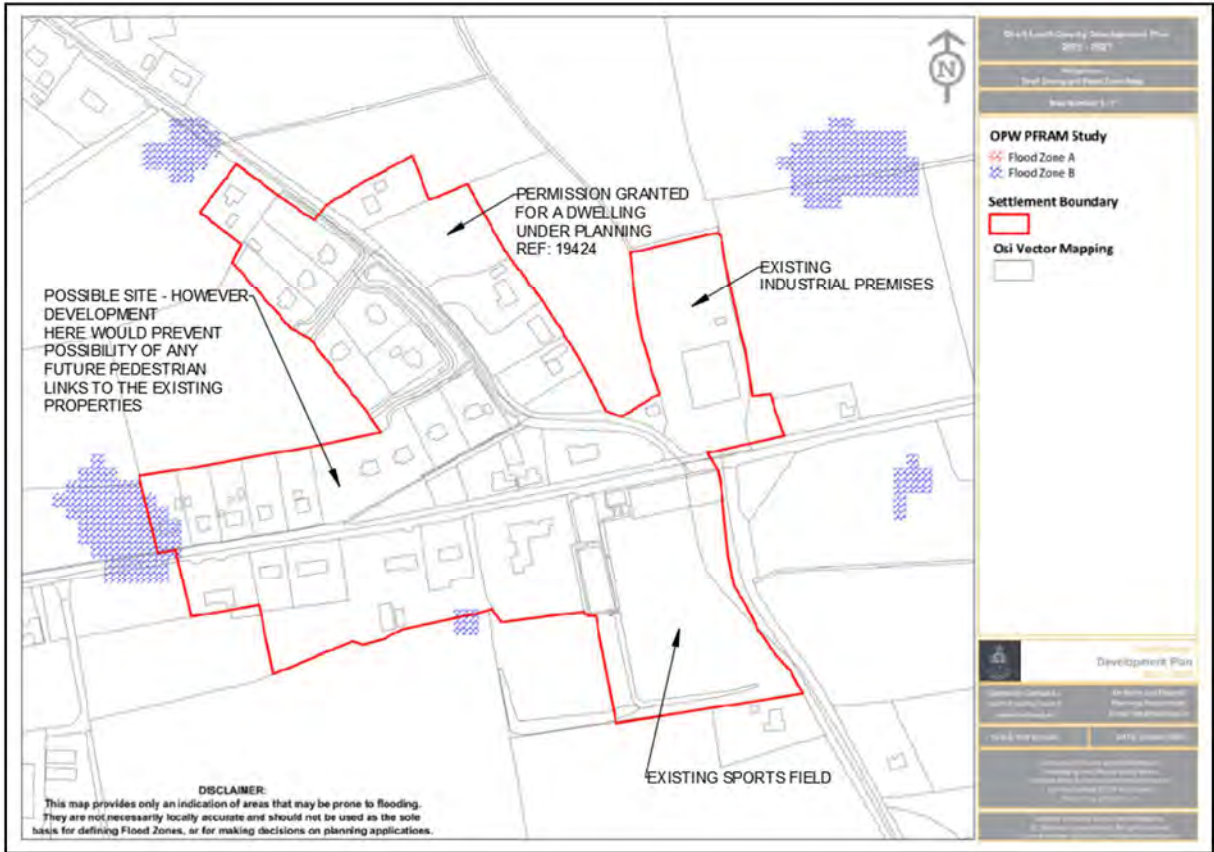


Figure 3 – Draft Philipstown Settlement Boundary

We would respectfully suggest that the settlement boundaries of all Level 5 settlements be reassessed to ensure that there is sufficient land identified within each settlement to allow for the future development of the village over a number of plan periods.

Issue 3 – Flood Risk Mapping

We would respectfully suggest that in some areas flood zones identified on the planning maps may be out of date or inaccurate. In this regard, we would suggest that flexibility should be afforded to applicants to be able to include modelling and flood risk assessments that may contradict the Draft CDP maps and that the Planning authority will consider such submissions and not be bound by the CDP maps if they are shown to be inaccurate.

Requested Changes:

1. The current county plan allows for people with ties to County Louth at Section 2.17 County Based Local Area Need for Level 4 Rural Settlements (now reclassified as Level 5) states:

A county based local area need refers to, the housing need of persons who are from County Louth or who work within County Louth. In determining what constitutes a county based local area need for Level 4 Rural Settlements, the Council will take into consideration the applicant's family, work, school and other ties with the County in addition to his or her accommodation needs.

We would request that HOU 42 be re-worded to require that applicants for new residential development (or purchasers of houses in a multi-unit scheme) be required to meet a county based local area need which will take into account the applicant's family, work, school and other ties with the County in addition to his or her accommodation needs.

2. We request that the boundary of Philipstown be changed in accordance with the map shown in Figure 4 below to include our clients land so that he can continue to develop the site to meet a housing demand.

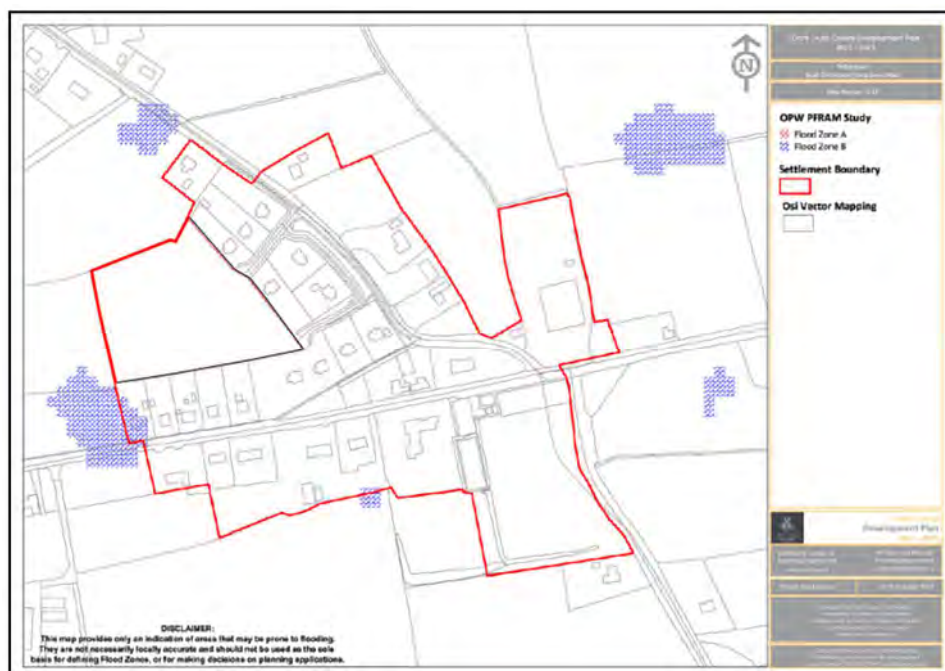


Figure 4 – Amended Philipstown Settlement Boundary

3. We respectfully suggest that the new plan include a Flooding Flexibility Statement acknowledging that the Flood Zone Areas A & B may not be accurate and that if it can be shown via hydraulic modelling flood risk assessments that flooding is not a concern, the planning department would be open to considering development on these lands.

Summary and Conclusion

It is respectfully submitted that the local needs restrictions as per Policy Objective HOU 42 for Level 5 Settlements and Table 3.5 of Draft Louth County Development Plan 2021 – 2027 be reverted to the existing criteria applied as per the current plan, with the emphasis on the County based need. Lands should be included within each of these settlements to allow for growth.

Without these requested changes together with proactive policies providing an incentive to build in these centres as opposed to the open countryside, these settlements will suffer significant decline and stagnation as the existing populations age.