

Forward Planning Unit.  
Development Plan Review.  
Louth County Council,  
Town Hall,  
Crowe Street,  
Dundalk A91W20C  
Co. Louth.

15<sup>th</sup> December 2020

Dear Sir/Madam,

**DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027**

**RE: SUBMISSION TO DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021 – 2027 ON  
BEHALF OF CHEVERDALE LTD – LANDS WEST OF BALFEDDOCK MANOR, BALTRAY ROAD  
/ DROGHEDA ROAD, BALFEDDOCK, TERMONFECKIN, CO. LOUTH.**

Cheverdale Ltd has retained Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House, Jocelyn Street, Dundalk, County Louth to make this submission relating to its lands at the above location. The submission is supported by an overview engineering assessment by AECOM Consulting Engineers stating that the site can be drained and that safe access and all utility services can be provided to the site.

Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth.

To assist Louth County Council in complying with the provisions of the Data Protection Act full details of our submission on behalf of Cheverdale Ltd are attached.



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## **1.0 INTRODUCTION**

1.1 The submission lands are located to the west of lands currently under development for c51 houses. Planning permission was originally granted for these 51 houses that are now under construction under P.A. Ref. 16/722 as varied under P.A. Ref. 18/897. This development is known as Balfeddock Manor.

1.2 Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth.

This submission seeks the rezoning of the lands edged blue on the Site Location Map below from L1 – Strategic Reserve to A2 New Residential in the Termonfeckin Village Plan.

## **2.0 BACKGROUND**

2.1 The submission lands extend to c5.61 hectares and are edged blue on the extract below from the Draft Termonfeckin village zoning map as contained in the Draft Louth County Development Plan 2021 - 2027. The Balfeddock Manor housing development, presently under construction to the east is also identified. The line of the partially constructed Link Road between the R167 Baltray Road and the R166 Drogheda Road is also highlighted. Balfeddock Manor is within the 50kph speed limit zone and is within 450 metres of Termonfeckin national school. Condition no. 14(ii) of the planning permission for the Balfeddock Manor housing development (16/772 as varied by 18/897) requires the provision of a footpath and public lighting along the R167 between the application site and the national school.

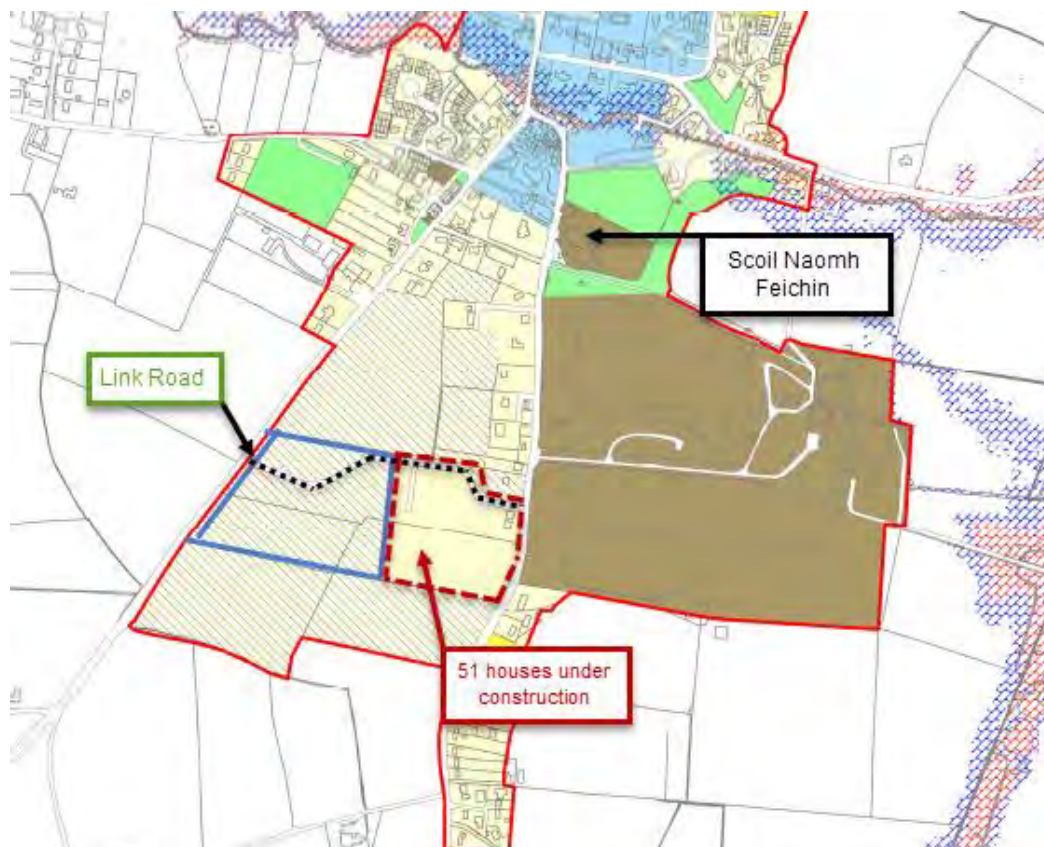


Figure 1 - Site Location Map

2.2 Until construction recently recommenced at the Balfeddock Manor housing development, the development site was an unfinished residential development (Dept. Ref. No. 1840 as surveyed 29-08-17). Planning permission was granted under P.A. Ref. 16/722 for the demolition of two existing dwellings on site, the construction of 51no. dwellings and completion of partially constructed access road on to the Baltray to Termonfeckin Road (R167) together with the completion of a section of a previously approved link road between the R167 and the R166 Termonfeckin to Drogheda Road as well as site development works. As noted this permission was varied under P.A. Ref 18/897.

2.3 In its assessment of P.A. Ref. 16/722, the Planning Authority acknowledged the Brownfield nature of the application site due to the site development works and two existing houses on site constructed under P.A. Ref. 06/62 before the downturn in the economy. In granting permission for the development proposed under P.A. Ref. 16/722, it was considered that the development of 51no. dwellings on this Brownfield site complies with National policy as outlined in the report *'Resolving Irelands Unfinished Housing Developments'* (2011). It remains a National Policy Objective to *"complete the process of resolving the legacy of unfinished housing estates"* (Rebuilding Ireland – Action Plan for Housing and Homelessness, p.104). We also note the approach to unfinished estates in this National document is a *"focus on early resolution strategies rather than retaining them for asset appreciate purpose"*.

2.4 Planning permission 16/722 permitted the completion of a section of the partially constructed access road on to the Baltray to Termonfeckin Road (R167) together with the completion of a section of a previously approved link road between the R167 and the R166 Termonfeckin to Drogheda Road will be completed as previously permitted under P.A. Ref. 16/722.

2.5 The zoning of the submission lands for residential development within the period of this Development Plan 2021 – 2027 would facilitate the completion of the partially permitted and partially constructed Link Road providing an important link between the Baltray Road (R167) and the Drogheda Road (R166). It has been an objective of several village plans for Termonfeckin to provide this Link Road.



Figure 2: Two partially constructed two storey dwellings have now been completed and the balance of the development is well underway at Balfeddock Manor

### **3.0 AVAILABILITY OF COMMUNITY FACILITIES IN PROXIMITY TO THE SUBMISSION LANDS**

3.1 Section 4.6 of the Draft Plan states as follows – *“Planning applications on zoned lands for residential development on sites of 1ha or greater, or for 100 residential units or more, shall be accompanied by a Social Infrastructure Assessment, to determine if facilities in the area are sufficient to provide for the needs of all future residents. Where deficiencies are identified, the assessment should demonstrate how these will be addressed, either through direct provision on site, or such other means and in a manner, which is deemed acceptable to the Council”.*

3.2 The area is well served by a national school, community centre/crèche, two churches, credit union, convenience shop, and leisure facilities. The Draft County Plan proposed to designate Termonfeckin as a self-sustaining Town in the County Settlement hierarchy and these community facilities demonstrate there is no short-fall in community facilities in the area as would be expected for such a Self-sustaining Town.

3.3 Table 2.4 of the County Plan describes Self-sustaining towns as follows –

*“Self-sustaining towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch-up’ investment to become more self-sustaining”.*

**3.4 There is a primary school located 500m from the submission lands which currently has 147 boys and 142 girls enrolled according to the Department of Education. A substantial extension has completed in the recent past (Figure 6). Secondary education is provided within Drogheda less than 10km from the site.**

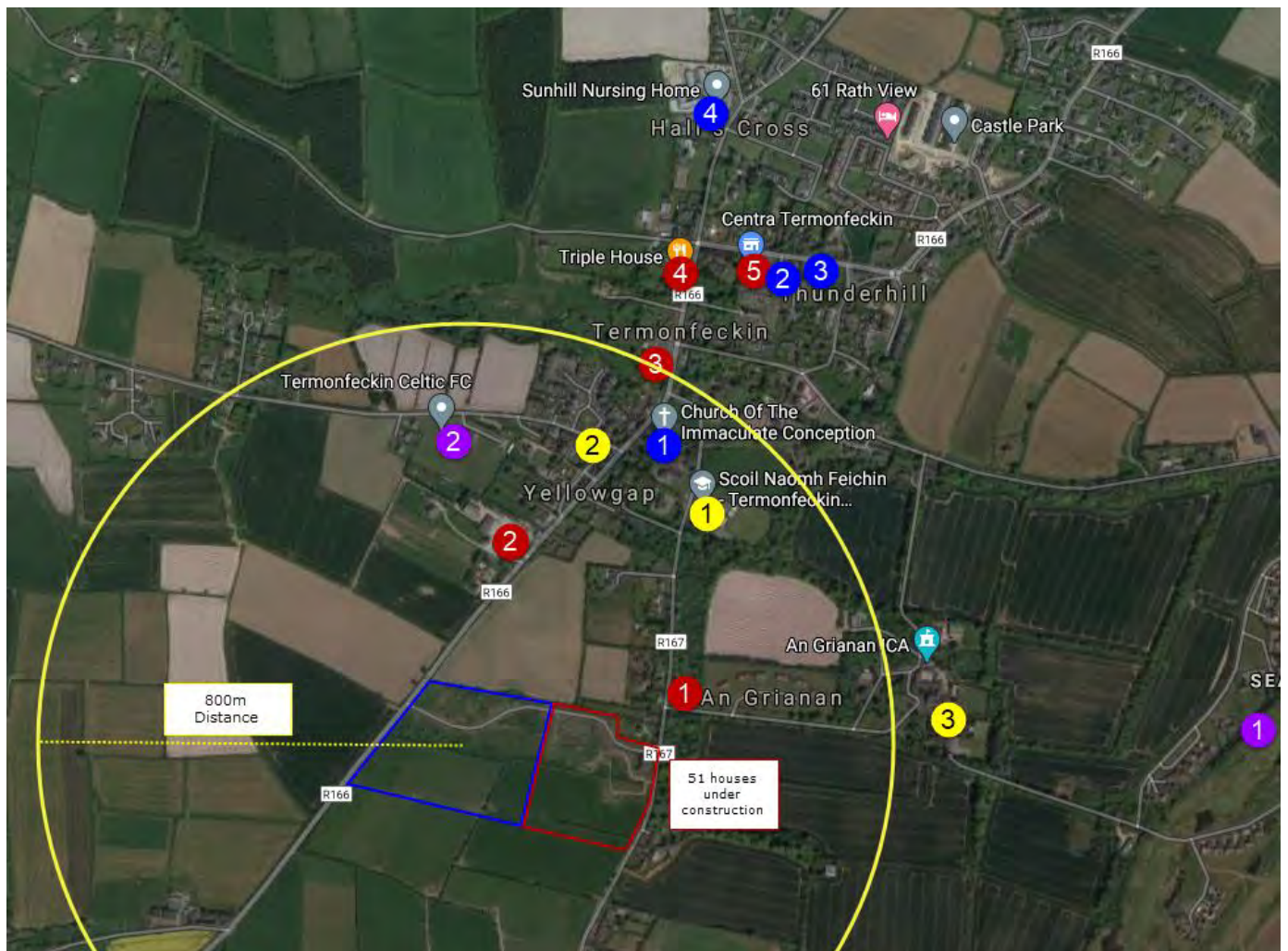


Figure 3 - Community Audit Map

Sports / Recreation	
1	Golf Club
2	Football Club

Community	
1	Church
2	Post Office
3	Credit Union
4	Nursing Home

Community Services	
1	Restaurant
2	Restaurant / Shop
3	Public House
4	Restaurant
5	Shop

Schools	
1	<u>Scoil Naomh Feichin</u>
2	Crèche
3	Adult Education Centre



Plate 1: National School within 500m of the submission lands

#### **4.0 THE DRAFT COUNTY PLAN AND POPULATION GROWTH**

4.1 The importance of understanding the purpose of population projections cannot be over-estimated. It is succinctly put by the Director of the Eastern and Midland Regional Assembly in his response to submissions on the Draft RSES where he states at Page 36 of his Report –

In relation to the population projection for Drogheda being too low, it is considered that the population target of 50,000 would enable a city scale population to be achieved in Drogheda and this is considered an appropriate target to aim for. It is important to note that this should not be viewed as a constraint on the growth of the town, rather that it is expected to reach this target and if it is exceeded by 2031, that it will be considered successful. Having regard to the calls for city status to be assigned to Drogheda, it is considered that the designation of city status to a settlement is not a function within the remit of the RSES, it is acknowledged that a population of at least 50,000 is considered to be a city scale and that is the target set in the RSES. However the RSES focuses on growth in the right locations and establishing the drivers for the settlement to sustainably grow as a strong Regional Growth Centre that is a priority focus for the region.

4.2 It would seem from an analysis of Table 2.9 of the Draft Plan, that the rate of population growth envisaged for the County over the period of the Development Plan will be less than that in preceding years. According to the Table the population of the County increased by 27,063 over the period 2002 – 2016 but is only expected to increase by 21,082 over the period 2016 – 2027. Whilst these are obviously different time periods, they nonetheless represent only marginal increases for Dundalk and Drogheda and severe reductions are envisaged for many of the towns and villages. For example, the population of Termonfeckin increased by 1,076 over the period 2002 – 2016 and is expected to increase by a mere 250 persons in the period 2016 – 2027

4.3 At the County level Column G to Table 2.9 of the Draft County Plan states that the average annual population increase in the County over the period 2002 – 2016 was 1,933. Column H to the Table states the projected annual average population increase over the period 2016 -2027 will be 1,916. These columns are not really comparable as they compare averages over different time periods. This suggests that the Draft Development Plan envisages a reduction in the rate of population growth in the County. Comparing columns E and F would suggest that the Plan envisages a reduction in the rate of population increase over the period of this Draft Plan when compared to the rate of population growth over the period 2002 – 2016.

***4.4 It is submitted the population and housing allocations show a real lack of ambition to drive the County and the two main settlements to full regional growth centres at a far quicker pace. Indeed the proposed rapid deceleration in the rate of population growth at Termonfeckin is severe and drastic and if adopted will undermine the ability of the village to growth or to even sustain community, commercial, recreational and educational services. There is no solid planning reason for doing this.***

4.5 It is submitted that the Traffic Light assessment system used is far too basic to allow objective assessment. In particular, no assessment is provided with regard to the availability of sites that are assessed. Given our submission that the proposed rapid reduction in population growth at the settlement will undermine the ability of the village to sustain its commercial, community, recreational and educational functions, and that the submission lands are unconstrained, the lands should be allocated for development. The allocated sites are in reality infill sites in any event.

## **5.0 THE CORE STRATEGY AND TERMONFECKIN HOUSING LAND ALLOCATION**

**5.1 County-Wide Land Requirements** – It is submitted there is a huge chasm in the baseline information available to the Planning Authority to make population, household and ultimately residential zoning allocations particularly in terms of the quantity of land that is required to meet housing requirements over the period of the new County Development Plan. There is no strong evidence base to support either the assumptions regarding the contribution from infill sites or the yield from these sites. In any event, it is strongly contended that infill and brownfield sites should be considered “windfall” sites and development on these sites should not be counted towards meeting housing requirements. Development on these sites only produces positive outcomes in terms of urban development and as such should be encouraged at all times regardless of how many dwellings are provided from this source. The approach in the Draft Plan is not an evidence-based approach. For example, it is not evident what sites were assessed and for that matter the level of detail at which these assessments were undertaken at and even the density assumptions applied are not provided.

5.2 Table 2.4 of the Core Strategy that sets out housing land requirements over the period of the Development Plan is far from clear in terms of how the amount of land required to be zoned is arrived at (Column L - Total Lands Zoned for New Residential Uses (ha). Similarly, how the figures within Columns J and K (Brownfield lands) were arrived at is not clear. It is also submitted that the contents of the Housing Allocations at Column I underestimate the required housing allocation of 8,278 over the Development Plan period. Column I is taken

from Table 4.1 of the Draft Housing Strategy and it is apparent that Table 4.1 of the Housing Strategy calculates the requirement over a 7 year period as opposed to the 6 year period of the Plan. Table 4.3 of the Housing Strategy estimates an annual requirement of 1,098 whereas it is evident from Table 2.14 of the Draft Plan that the actual Draft Plan itself estimates an annual requirement of 1,380 dwellings per annum. These Housing Allocations derive from the Draft County Housing Strategy and the Housing Needs Demand Assessment at Appendix 3 to the Draft Plan. It would seem that Column H (Approximate Units Completed 2016 – 2020) includes 'one-off' houses. Such housing provision should not be included as part of the required allocation over the period of the Development Plan.

5.3 It is submitted that in the absence of national guidance on preparing development plans and on the preparation of housing strategies that a very high degree of flexibility needs to be contained in terms of housing provision for towns and villages. It is neither advisable nor appropriate for population or housing provision over the Plan period to be set out at caps or thresholds not to be exceeded, which is the approach adopted in the Draft Louth County Plan.

***5.4 As per the Director's Report from the Regional Spatial Strategy population growth rates should be seen as targets which the Council should aim to achieve as minimums and should embrace and celebrate when targets are met and exceeded. Otherwise County Louth runs the risk of underperforming in terms of achieving its population and housing targets.***

5.5 It is submitted that a housing allocation of only 40 units for a self-sustaining town such as Termonfeckin is far too low and does not reflect the capacity of the settlement to accommodate additional housing development.

## **6.0 APPLICATION OF 'TRAFFIC LIGHT' LAND ALLOCATION SYSTEM TO THE SUBMISSION LANDS**

6.1 As set out above, it is submitted the population growth rates and the resultant housing allocations at the towns and villages are far too low and if implemented would see severe stagnation of populations at the villages, including Termonfeckin. Looking at Termonfeckin, a reduction in the annual population increase from c77 per annum to c23 per annum over this Plan period would have severe negative implications for the ability of the settlement to sustain its commercial, educational, recreational and community facilities.

6.2 Termonfeckin is identified as a Level 3 Self-sustaining town within the County settlement hierarchy. The Draft Village Plan notes the settlement is well served by community facilities. This is supported by the Community Audit undertaken as part of this submission. In addition, there is adequate water services and there is available capacity in the public foul drainage system that serves the settlement. It is also noted there was been a recent improvement in public bus services serving Termonfeckin and linking the village with Drogheda and also with Dundalk. This is the new bus route 168 that recently came into service.

6.3 The County Core Strategy promotes a “Traffic Light” system to identify the suitability of a site for new development. A site with a lower score is more preferable to a site with a higher score. The sites assessed at Termonfeckin are at pages 39 and 40 to Appendix 2 to the Draft Plan.

6.4 The submission lands would score well in terms of availability of infrastructure including roads, footpaths, public lighting, wastewater and water supply. Notwithstanding that Site 4 in the Termonfeckin assessment scored poorly because of severe negative marking for “Consolidate /compact Growth” and “Infill/backland” development, it is contended that these poor scores only arise because of a pre-determined decision that the village should not grow.

6.5 It is submitted that the lands the subject of this submission would receive a very low (good) score by way of objective assessment. The northern portion of the lands are brownfield having been previously subject to construction and engineering works. There is a permitted and under construction residential development to the east of the lands. There is safe vehicular access to the lands and all infrastructure and other utility services are available. As noted condition 14(ii) of planning permission 16/722 requires the construction of a footpath from the eastern (Balfeddock Manor) side of the site as far as the national school where the footpath would connect to the existing footpath system in the village. The zoning of the lands would also facilitate the completion of the Link Road between the Baltray Road (R167) and the Drogheda Road (R166).

## **7.0 CONCLUSIONS**

7.1 The Draft Plan proposes a rapid reduction in population growth at Termonfeckin. If adopted this will have severe negative implications for the future sustainability of community, educational, recreational and commercial services. The submission lands present an opportunity to allow a sustainable level of population growth over the period of the new Development Plan. The zoning of the submission lands would also facilitate the completion of the partially constructed Link Road between the Baltray Road and the Drogheda Road. There is safe access to the lands and all required infrastructure and services are available to allow the lands to be developed.

Louth County Council  
County Hall  
Millennium Centre  
Dundalk  
Louth  
A91 KFW6

10 December 2020

**Submission with respect to lands at lands at Termonfeckin, Co. Louth - Cheverdale Ltd**

Dear Sir/Madam

This letter has been prepared to support the submission by Stephen Ward Town Planning & Development Consultants on behalf of Cheverdale Limited with respect to the lands at Balfeddock Termonfeckin, Co. Louth. AECOM have previously completed planning stage engineering design on the adjacent site to the subject lands under PA Ref 16/722 as varied by 18/897 and are therefore a very familiar with the lands in question.

With respect to vehicular and pedestrian access, the development currently under construction (PA Ref 16/722 as varied by 18/897) when completed, will provide road and pedestrian facilities that will allow for safe and efficient access to the subject lands for both vehicles and pedestrians. In addition, the main access road within the development can be extended to provide a link between the R166 and R167, if the council deems this a requirement.

AECOM also can confirm that the subject lands can be drained and serviced, subject to adequate capacity being available in the existing public infrastructure. The designs put forward as part of the PA Ref 16/722 as varied by 18/897 with respect to surface water, foul water and water supply have sufficient capacity to serve the subject lands and furthermore have connection points provided to serve the subject lands.