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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 County Development Plan 2021 – 2027

**Submission on behalf of Mr Andrew Purcell
relating to Lands at Termonfeckin 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 Andrew Purcell to make this submission on behalf of himself and neighbouring landowners. The relevant land holdings are identified in the images below and please find attached contact details for our client separately as directed.

Background:

Our clients have significant land holdings in Termonfeckin, adjacent and contiguous to the built up centre of the village. The extent of their landholdings are shown in Figures 1, 2 and 3 below.

Our clients feel that prior to its adoption, the Draft County Plan 2021 – 2027 should be amended to take account of the following:

1. The written statement for Termonfeckin fails to set out a comprehensive vision for Termonfeckin, and its stated aims and objectives are unambitious and will not result in the sustainable growth of the settlement.
2. Core Strategy – Housing Allocations 2021 – 2027 for Self-Sustaining towns (Termonfeckin, Tullyallen, Clogherhead, Carlingford, and Castlebellingham/Kilsarin) are too small at only 5% of the county total. The Housing Allocation for smaller settlements and the open countryside amounts to 15% of the overall projected allocations.
3. Termonfeckin's Housing Allocation of 41 units within the plan period is disproportionately low when compared with other Level 3 settlement towns.
4. The A2 zoned land in Termonfeckin is very unlikely to deliver the required numbers, and additional appropriately located lands should be zoned for residential purposes.



Figure 1 - Land Ownership

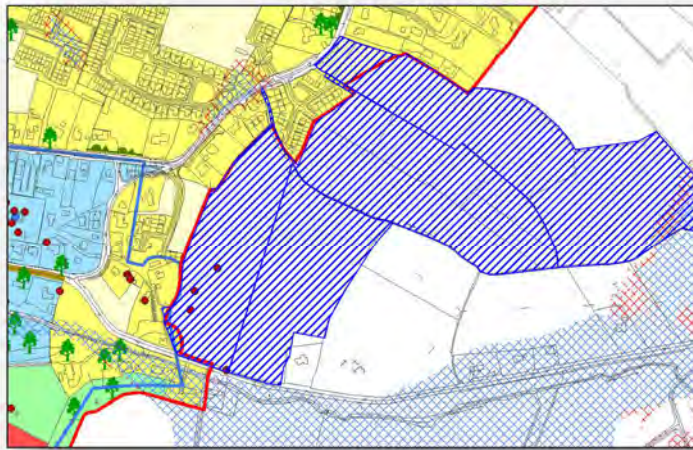


Figure 2 - Current Land use Zoning map

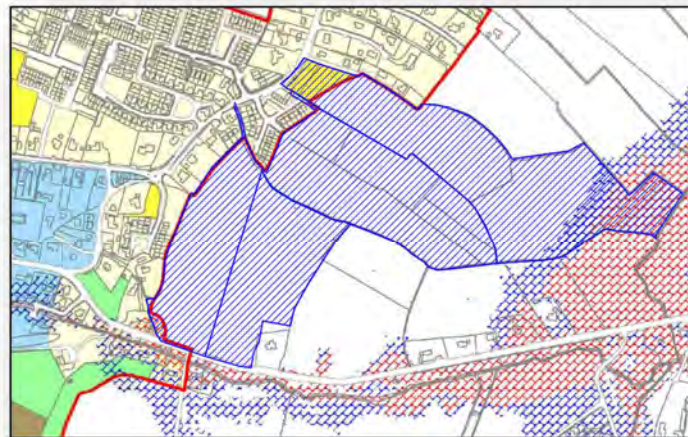


Figure 3 - Draft Land Use Zoning Map

Key Issues:

1. Vision for Termonfeckin

Section 2.3.2 of the Draft Plan describes Louth's Settlement Hierarchy and groups Termonfeckin as one of the level 3 settlements of 'Self Sustaining Towns', as defined by National and Regional planning policies.

Self-Sustaining Towns require investment in services, employment and infrastructure whilst balancing housing delivery. These include; Carlingford, Castlebellingham/ Kilsaran, Clogherhead, Termonfeckin and Tullyallen.

In the Draft CDP section on Louth's growth strategy (Section 2.4.4), we note that it is intended to support self-sustaining towns requiring contained growth and investment in service delivery whilst balancing housing delivery.

Section 2.5.2 notes that during the period 2011 - 2016 growth occurred in the higher tier and lower tier settlements. In percentage terms relative to the size of the settlements, the Self-Sustaining Towns such as Carlingford, Tullyallen, Clogherhead, and Termonfeckin, experienced higher levels of growth than some larger settlements. This happened with no investment in or provision of community infrastructure, public realm, or employment creation.

The written statement for Termonfeckin, in its introduction notes that Termonfeckin has a 'rich history' and a 'strong sense of place.' A disconnect is noted between what was considered to be the former village centre (Pub/Restaurant at Ballywater River) and the shop/credit union on Big Street.

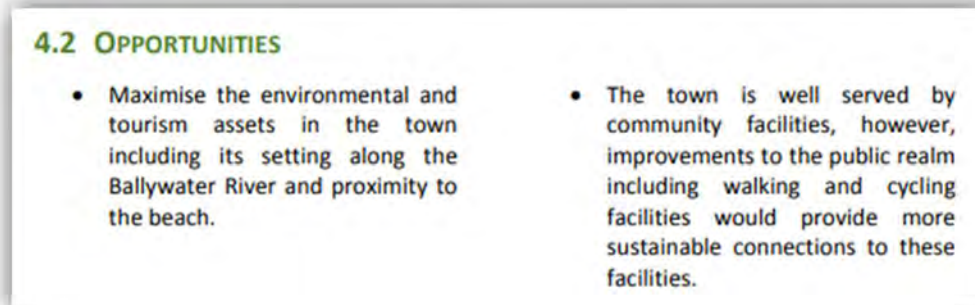
An overview of the settlement is provided at Table 4.1 reproduced below:

Table 4.1: Settlement Overview

Position in Settlement Hierarchy	Self-Sustaining Town
2016 population	1,579
2011 Population	1,443
Percentage Change 2011-2016	9.4%
Housing Stock 2016	584
Residential Units granted since 2015	96 units (40 units completed)
Housing Allocation 2021-2027	41
Population Projection 2027	1,829
Education Facilities	Scoil Naisiunta Naomh Feichin
Community Facilities	Church, nursing home, crèche and GAA pitch.
Architectural Conservation Area (ACA)	No
Protected Structures	11
Zone of Archaeological Potential (ZAP)	Yes
Views and Prospects	No
Adjacent / Links to European Sites	Boyne Coast and Estuary SAC.
Strategic Flood Risk Assessment	Flood Zones A and B on land located along the River Ballywater

The Jobs / Worker Ratio for the settlement is 0.32, indicating that whilst considerably higher than the other Self Sustaining Towns, the town is not in fact self-sustaining, it relies on other larger settlements for employment opportunities.

Section 4.2 lists the opportunities for Termonfeckin as follows:



The written statement doesn't say how these opportunities might be realised. The Draft County Development Plan notes that the town experienced rapid growth in the 90's and early 2000s and that it is an attractive place to live. The strategy for Termonfeckin from a housing point of view is stated as: '*Future development in Termonfeckin during this Plan period will focus on consolidation and the build out of extant permissions, with opportunities for infill and brownfield development close to the town centre.*'

Section 4.4 relates to employment and the economy and it notes the weak employment base and dependence on outbound commuting (like every other small town in Ireland). It notes that employment opportunities do exist in the following sectors:

- Service Sector
- Education at An Grianan
- Education at the national school
- Retail
- Nursing home
- Creche

It states as a matter of fact that '*Future employment in the town will be concentrated in these sectors.*' The opportunity identified at Section 4.2 above relating to maximising the tourism potential could be developed here, but the Draft Plan sets out no vision in this regard. We note with interest the reference to the provision of a remote working hub (Section 4.4), but no site is identified, and no strategy for delivery is included.

The Draft Plan notes that there is capacity in the water supply and foul drainage networks serving the town. It also notes that there is a regular daily bus service to Drogheda.

It is noted in Section 4.9 of the Termonfeckin written statement that there are a lot of community facilities including:

- Shops, pubs, Restaurants and Cafes
- Hotel, Churches and Credit Union
- Petrol Station
- Creche, Post office and Nursing Home
- Soccer Pitches, 2 international standard Golf Clubs, Gaelic Grounds (at Beaulieu)
- Beach, National School and Adult education possibilities

An Grianan is mentioned too (It's a cookery school, wedding venue, home of an international Harp Festival, and home of the ICA, however Section 4.9 missed the pitch and put course and the caravan/mobile home parks nearby. Also not mentioned, but worth noting there are excellent (relatively) safe walking routes through the housing development at Sea Point golf club, An Grianan and linking with the Town centre via the sea point road should also be noted. It seems that the small population of Termonfeckin has an abundance of options when it comes to community and social infrastructure.

Finally, the written statement ends with a number of specific policy objectives. However, there is no clear vision for the settlement, and nothing to differentiate it from the other level 3 settlements. Self-Sustaining Towns are characterised by historic rapid housing growth with lagging 'services, employment and infrastructure' and require these deficits to be balanced with housing delivery. We would contend that there is no service or infrastructure deficit in Termonfeckin, and in this regard, Termonfeckin is considerably different to other Level 3 settlements like Tullyallen and Clogherhead for example. Neither of these towns have the range of social and community facilities to offer and both perform considerably worse than Termonfeckin from a Job/worker ratio (0.2 and 0.17 respectively) and yet both have multiples of Termonfeckin's housing allocation (139/115 Versus 41). No explanation is provided for this.

2. Core Strategy and Housing Allocations

The table below summarises the Draft CDP core strategy approach. It can be seen that the projected population increase (from the last Census in 2016) to the end of the plan period is 16.4%, or 21,082 persons.

		Pop 2016	Projected Pop 2027	% Pop Increase over 2016	Increase in Pop. over 2016	% of total Pop increase	Housing Allocation 2021 - 2027	% of total housing allocation
County		128,884	149,966	16.4%	21,082		8,278	
Level 1	Regional Growth Centres	73,203	87,777	19.9%	14,574	69.1%	5,649	68.2%
Level 2	Self Sustaining Growth Towns	6,750	9,340	38.4%	2,590	12.3%	929	11.2%
Level 3	Self Sustaining Towns	7,842	8,922	13.8%	1,080	5.1%	415	5.0%
Level 4	Small Towns	5,103	5,888	15.4%	785	3.7%	414	5.0%
Level 5	Villages and open county	35,986	38,039	5.7%	2,053	9.7%	871	10.5%
Rural area								

It has been decided to increase the population of the Regional Growth Centres by nearly 20%, together with increasing the populations of Ardee and Dunleer by almost 40%. By contrast the plan seeks to grow the populations of the Self Sustaining Towns by only 13.8%. This seems out of kilter with the plan to grow Dunleer and Ardee by 40% (contrary to the provisions of National Policy Objective 9 which requires the agreement of the regional authority to exceed 30%

unless for Regional Growth Centres in Louth's case). It seems especially onerous and limiting when the core strategy seeks to grow lower tier settlements by a bigger amount (over 15%).

The table shows that 11% of the total county housing allocation (871 units) for the plan Period is set aside for one off houses in the countryside (given the lack of opportunities to build within the settlement boundaries of villages). This figure is bigger than Level 4 and Level 3 settlements combined. This seems to be contrary to National and Regional planning policies which seeks to consolidate development in serviced settlements and indicate that building in the open countryside should be discouraged and carefully controlled.

We contend that the focus should be on compact forms of growth. We would respectfully suggest that Louth Co Co should reconsider consider the Housing Allocations to increase the level of residential development that can be delivered in Level 3 Settlements and allowing them to grow a higher rate than settlements below it in the settlement hierarchy, and at a closer rate to that of the Level 2 and Level 1 settlements above it.

If permitted, Termonfeckin, can play an important role as an alternative location for residential growth in the open countryside, and to settlements which have no services and limited infrastructure. We believe that these important Level 3 settlements should be encouraged to grow so that they can reach their full potential, providing additional social and community facilities to rural catchments and avoid population decline at the same time. These settlements can help to cater for rural housing needs, providing a viable alternative to one-off unsustainable developments in the countryside. These settlements can cater for a range of different development types, including more sustainable residential developments, and the potential for provision of serviced sites to cater for rurally generated housing needs and those who wish to build their own home.

The National Planning Framework sets out a Vision for Ireland 2040. It is a framework for our villages to our cities and everything in between. It does not require all population growth and development to occur in Irelands 5 cities and 5 regional growth centres. The role and future of rural villages is protected.

The NPF creates a new emphasis on avoiding sprawl and continual expansion and providing for compact development and the role of smaller villages is acknowledged in his regard.

The Goals of the NPF include careful management of the sustainable growth of compact cities, towns & villages to add value and create more attractive places for people to live and work.

Section 2.2 of the NPF sets out an overview of the strategies to be implemented. All of these are to be rolled out and implemented side by side together. They include

- Reversing town/village and rural population decline.
- Supporting the sustainable growth of rural communities.
- Ensuring a Local Authority led approach to identifying & meeting rural housing needs.
- Improving connectivity to communications, transports, water and wastewater networks

National Policy Objective 6 underpins the equal status that villages enjoy:

National Policy 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.

National Policy objective 19 requires that in rural areas under strong urban influence, single housing in the countryside should only be permissible on the basis of demonstrable economic or social need to live in a particular rural area, having regard to the viability of smaller towns and rural settlements.

Please also refer to Section 4.8 of the Regional Spatial and Economic Strategy (RSES) for East Midlands Region and in particular (RPO 4.8). The RSES provides more layers of detail particular to the region and it identifies most of County Louth as being an area under strong urban influence. Section 3.17.2 of the Draft CDP repeats this requirement for one off housing in the countryside to be limited to those who can demonstrate a 'social need' to live in a rural area. Tables 3.4 and 3.5 set out who can build in the open countryside (and in Villages at Level 5 on the Hierarchy). These tables do not set out what constitutes a 'social need', and instead they say that 'native residents' with a housing need can build in the open countryside. This policy is contrary to national and regional policy as expressed in National and Regional policy documents. The housing allocations for one-offs for children of those living in the countryside should be reallocated to settlements with a suitable level of social and community infrastructure, piped public services and public transport services.

The RSES, underpinning the NPF policies referred to above says that facilitating housing in the rural parts of the region is of paramount importance to ensure the vitality and viability of small towns and villages. The RSES tells us that promoting housing and population growth in rural settlements is a viable alternative to rural one-off housing. This contributes to the principle of compact growth.

3. Housing Allocation for Termonfeckin

Comparison of Level 3 Settlements					
	Termonfeckin	Carlingford	Castleb'ham	Clogherhead	Tullyallen
2016 Population	1579	1445	1126	2145	1547
2011 Population	1433	1045	1035	1993	1348
% Change 2011 - 2016	9.40%	38.50%	8.80%	7.60%	13.90%
Housing Stock 2016	584	840	510	896	500
R.U. granted since 2015	96 (40 comp)	4	59 (8 comp)	12 (0 comp)	21 (0 comp)
Housing Allocation 2021 - 2027	41	41	79	139	115
Population Projection 2027	1829	1645	1236	2445	1767
Occupancy at 2016	2.7	1.7	2.2	2.4	3.1
Total R.U. if granted and allocated are provided	721	885	648	1047	636
Expected Occupancy at 2027 using pop projection	2.5	1.9	1.9	2.3	2.8
Ha Zoned for New Residential	2.4	2.2	10.9	2.9	0.0
Ha identified with infill potential	3.4	2.6	1.1	1.6	1.2

The housing allocation of 41 units for Termonfeckin over the plan period is too low – the joint lowest of the 5 Level 3 settlements, with the second highest population. Castlebellingham gets double the allocation, Clogherhead gets 3.5 times Termonfeckin’s allocation and Tullyallen nearly three times more. All of these settlements are planned to have similar population growth of perhaps 15%. In the case of Termonfeckin, it seems that the housing allocation is limited because of extant permission for 96 units. Over 70 of these are related to a single developer and this effectively hands control of the roll out of housing to that single operator, and control over price with it.

4. Potential for Residential Development on A2 Zoned Land.

There are four sites in Termonfeckin zoned A2 for new residential development. They are marked 1 – 4 on the map below.

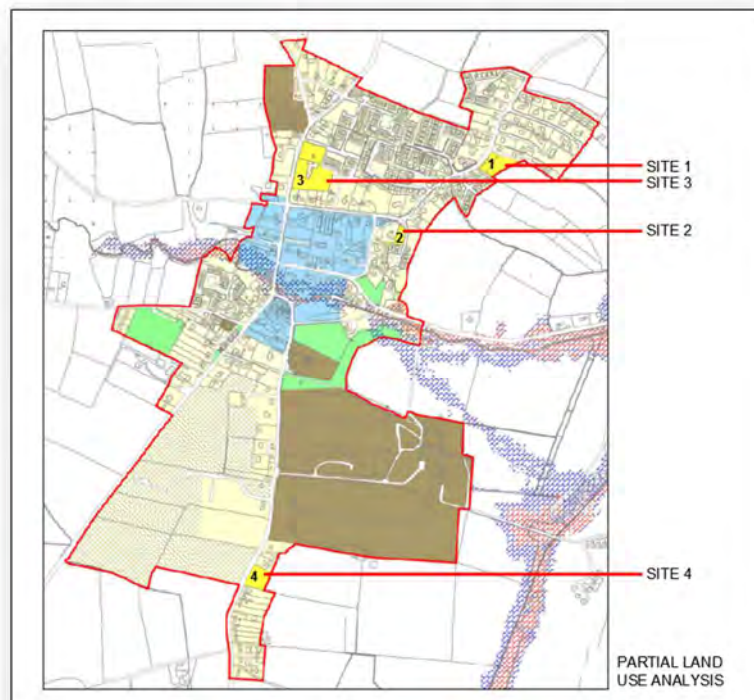


Figure 4 - Draft Land Use Zoning Map – A2 Zoned Lands

- Site 1 comprises approximately 0.51Ha, is an awkward shape and could potentially yield of 10 – 12 units given its constraints and the pattern of surrounding developments.
- Site 2 at the entrance to Barbizon Hall and measures approx. 0.16Ha. The site is owned by the same person who owned the land on which Brabazon Hall. Respectfully, we would contend that had the owner an intention of developing this site, then it would have happened already. In any event, it has a potential yield of 2 – 4 units.
- Site 3 on the Clogherhead road comprises approximately 1.37Ha and it is the grounds of a protected structure with outbuildings within its curtilage. New residential in this area would be limited accordingly, and perhaps this site is capable of delivering 4 - 6 units.

- Site 4 on the Baltray road comprises 0.41Ha limited by the pattern of development around it. At most, it could deliver 4 units at this location.

Between them, these new sites have the potential to deliver a maximum of 26 units. It should be noted that these sites have all been so zoned for many years, through the first LAP for Termonfeckin and Baltray circa 2004. No planning history pertains to any of these sites.

Accordingly, we contend that even with such a low population growth target of just 41 Units for the plan period, there isn't enough land zoned for the purpose to deliver it. Village centre lands are either built on, in private mature gardens or within Flood Zoned B. There is little or no likelihood of existing B1 Zoned land making up the shortfall.

Requested Changes:

1. Housing Allocation for Termonfeckin to be increased to achieve equity with other self-sustaining towns. The allocation can be found by reducing the level of population growth planned in Ardee and Dunleer along with reducing the plan to build another 870 units in the open countryside.
2. The County Development Plan should include a series of objectives and implementation measures setting out how Termonfeckin can achieve its tourism and job growth potential including the identification of appropriate sites. A comprehensive vision statement in this regard should be included in the written statement.
3. Land Use zoning Map to be amended as shown below in Figure 5

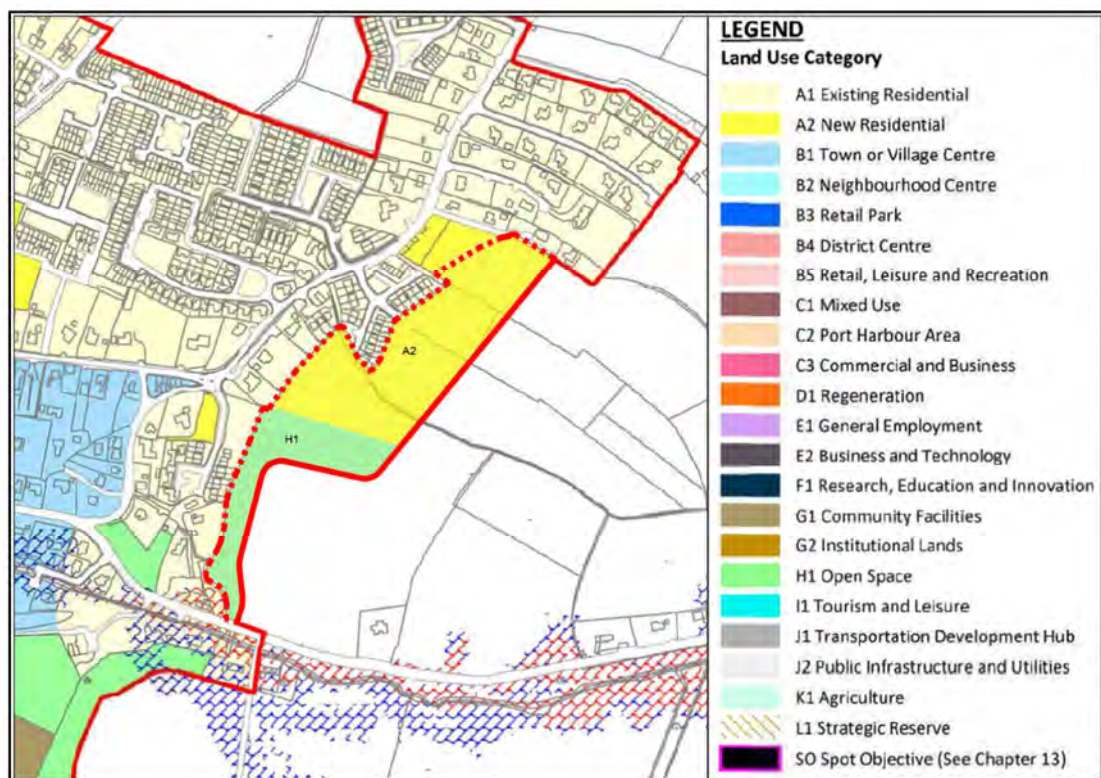


Figure 5 – Proposed Amended Land Use Zoning Map

This will result in an additional area of A2 zoned land for residential development, together with designated green spaces accessible from the centre of the village and a pedestrian/cycle link to the Seapoint road. This A2 land could deliver 50 – 75 units if it were all built out.

Summary and Conclusion

- Termonfeckin is identified in the Draft Plan as one of the level 3 settlements of ‘Self Sustaining Towns’
- Termonfeckin has an abundance of options when it comes to community and social infrastructure.
- Section 4.2 of the Draft Plan mentions maximising the tourism potential of the town but sets out no vision in this regard
- The housing allocation of 41 units for Termonfeckin over the plan period is too low – the joint lowest of the five Level 3 settlements
- The RSES, underpinning the NPF policies says that facilitating housing in the rural parts of the region is of paramount importance to ensure the vitality and viability of small towns and villages. The RSES tells us that promoting housing and population growth in rural settlements is a viable alternative to rural one-off housing. This contributes to the principle of compact growth
- A2 & B1 zoned lands as per the Draft Plan do not provide enough land to deliver the allocated 41 Units
- Housing allocation for Termonfeckin should be increased and the land use zoning map should be amended to include for additional A2 & H1 zoned lands

I trust that this is to your satisfaction and that you will take the forgoing into consideration where preparing a draft Development Plan for 2021 – 2027