



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 County Development Plan 2021 – 2027

Submission on behalf of Mr Des Campbell in relation 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 Des Campbell to make this submission on his behalf.

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

Background:

Our client owns a small site in on the Coast Road at Termonfeckin, zoned A2 for new residential development – it is outlined in blue on the excerpt from the Draft Land Use Zoning Map for Termonfeckin below and it measure 0.51 Hectares.

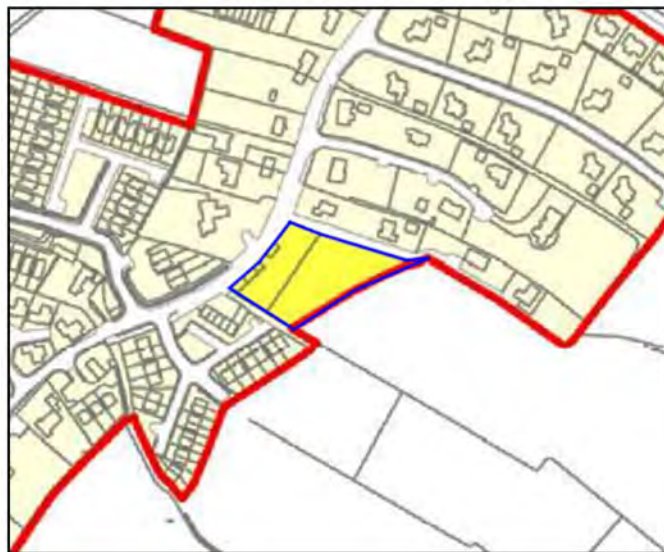


Figure 1 – Des Campbell ownership overlaid on Draft Land Use Zoning Map

The settlement boundary of Termonfeckin steps awkwardly around the gable end of number 22 The Stables to the south of our clients A2 zoned land and then goes north east at an odd angle before turning south east to take in existing houses adjoining our clients lands.

We now seek to have this odd alignment of the settlement boundary corrected to reflect the line shown on figure 2 below. This would result in an additional 0.12 Ha of A2 lands being zoned.



Figure 2 – Proposed Amended Land Use Zoning Map

The effect of this change would be to make the site more readily developable in a pattern that takes its lead from the stables development. Squaring up of the zoned land will allow for a more regular pattern of development and improve the potential yield to achieve the best possible return from zoned serviced lands. Odd and angular shaped sites tend to result in lower gross densities.

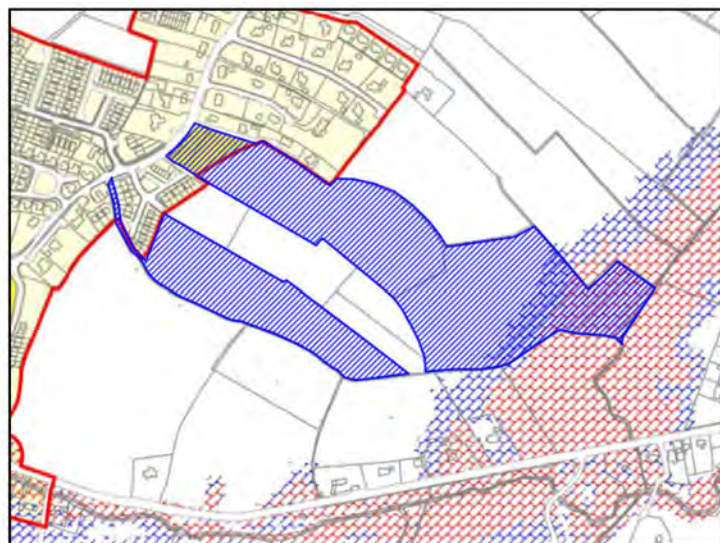


Figure 1 – Des Campbell ownership overlaid on Land Use Zoning Map

Key Issues:

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

1. Core Strategy: Termonfeckin's Housing Allocation of 41 units within the plan period is disproportionately low when compared with other Level 3 settlement towns.
2. The A2 zoned land in Termonfeckin is very unlikely to be able to deliver the required numbers, and additional appropriately located lands should be zoned for residential purposes.

Core Strategy Housing Allocation for Termonfeckin:

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. Please refer to the summary table for these settlements below.

You will note that Castlebellingham gets double Termonfeckin's 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.

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

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.

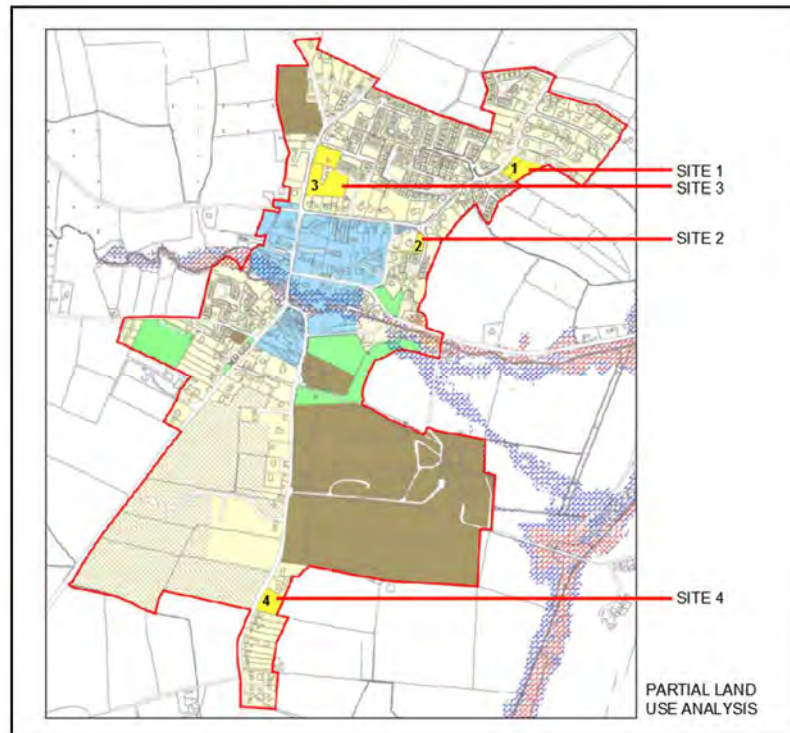


Figure 4 - Draft Land Use Zoning Map – A2 Zoned Lands

- Site 1 (owned by our client, and the subject of this submission) on Coast Road comprises approximately 0.51H, is an awkward shape and could potentially yield of 10 – 12 units given its constraints and the pattern of surrounding developments.
- Site 2 is at the entrance to Barbizon Hall and measures approximately 0.16 Ha. 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 1.37 Ha 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 0.41 Ha 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. 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.

Our clients land adjacent to the already zoned A2 lands on the Coast Road are ideally located and appointed within and contiguous to the built up centre of Termonfeckin for additional zoning.

Requested Changes:

- 1. Housing Allocation for Termonfeckin to be increased to achieve equity with other self-sustaining towns.**
- 2. Land Use zoning Map to be amended as shown below in Figure 5**

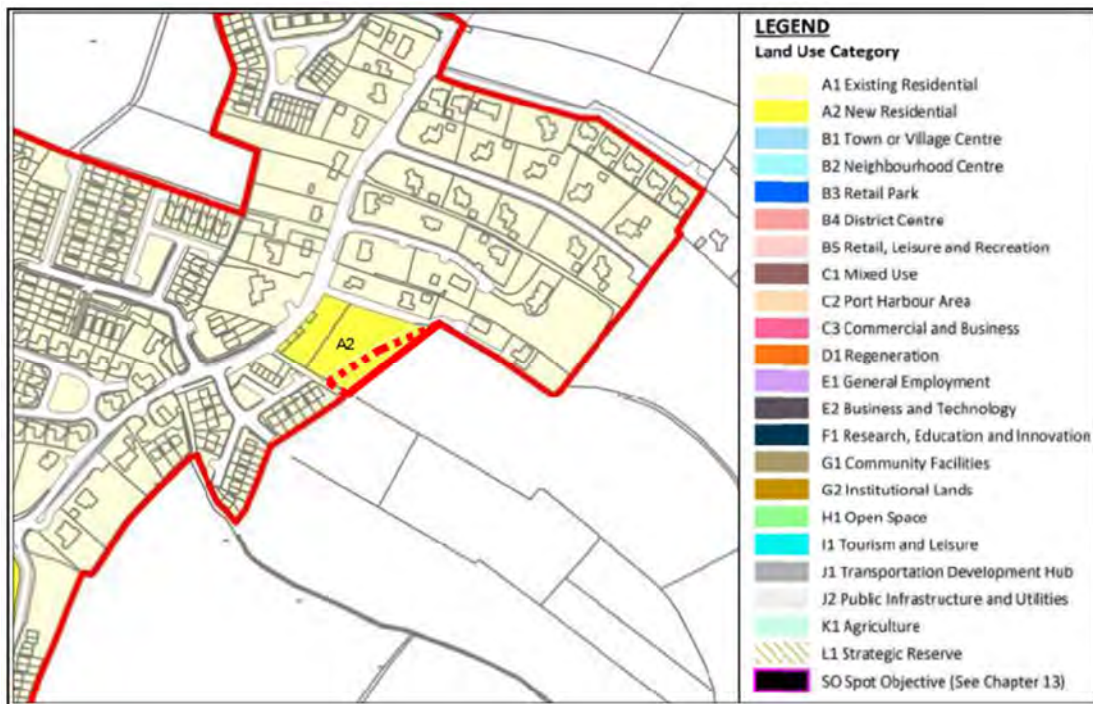


Figure 5 – Proposed Amended Land Use Zoning Map

This will result in an additional gross area of 0.12Ha A2 zoned land for residential development. An indicative layout of the potential develop ability of the lands if the additional 0.12Ha A2 Zoned land is applied at this location is shown below.

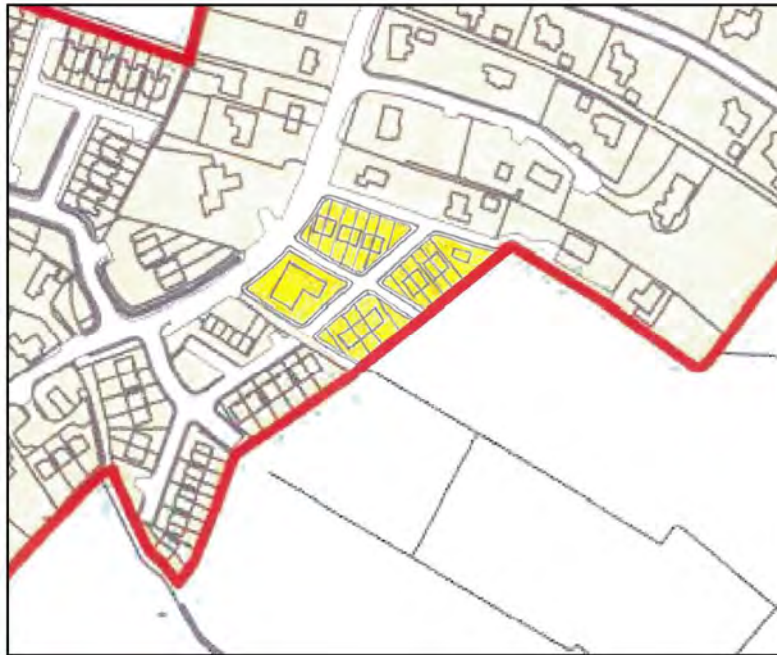


Figure 6 – Indicative Layout of Development of Subject Lands

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.
- 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 zoned lands as per the Draft Plan do not provide enough land to deliver even 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 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