



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 Tracy and Claudine Flynn.
In respect of 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 Tracy and Claudine Flynn to make this submission on their behalf.

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

Background:

Our clients are the owners of a public house with guest accommodation and lands at Termonfeckin Co. Louth and they have a particular interest in the compact growth and development of facilities at Termonfeckin. Our client is concerned that due to the lack of available serviced zoned land at the centre of the Village, its future potential is at risk and a submission was made at Pre-Draft stage in this regard.

We believe that the Draft County Development Plan lacks a clearly defined vision for the future development and role that Termonfeckin can play in County Louth. The Village, although defined a 'Self Sustaining Town' in the Draft CDP, lacks a defined central core or focal point, and much of the land provided for village centre land uses is already developed, forms part of private established mature gardens, and/or is compromised by inaccurate flood mapping.

Our client's significant land holding in Termonfeckin, adjacent and contiguous to the built-up village core is shown in Figures 1, 2 and 3 below.

Our client request 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 help to deliver 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 mixed uses including residential purposes.
5. A statement should be provided to allow for flexibility in relation to inaccurate flood mapping and allow for the consideration of flood path modelling and evidence-based justification accompanying an application to build in areas identified on the land use zoning map for the settlement as being at risk.
6. The development boundary should be extended to include our client's lands as shown in Figure 9 and the lands zoned for mixed use development. This would accommodate additional tourist accommodation on the site, some residential development in the heart of the village a developed Riverside park and potentially a site for a remote working/digital hub facility or other appropriately scaled employment uses.



Figure 1: Satellite Image - Land Ownership

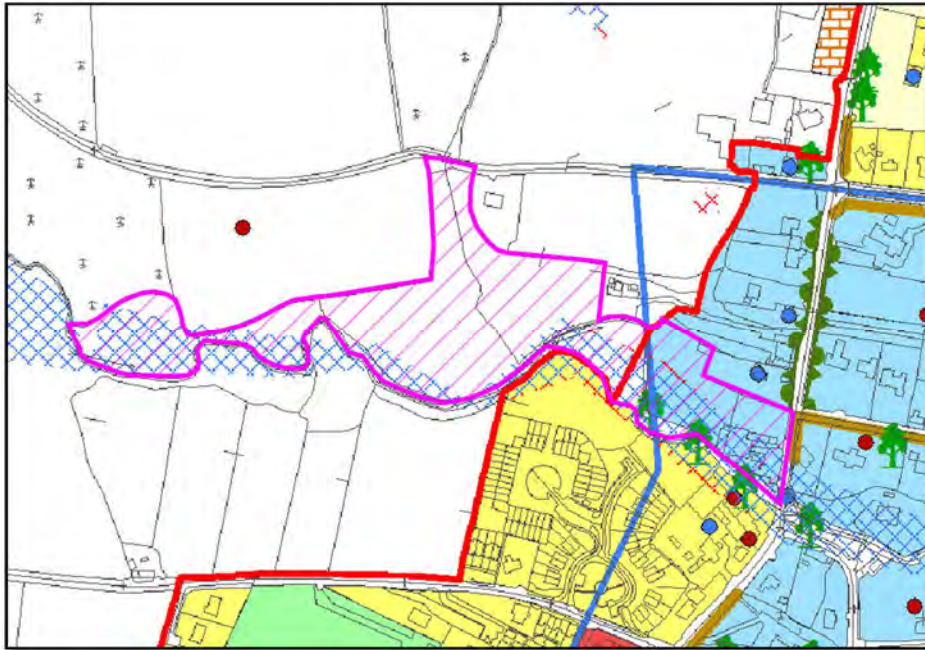


Figure 2 : Current Louth County Development Plan Land Using Zoning Map

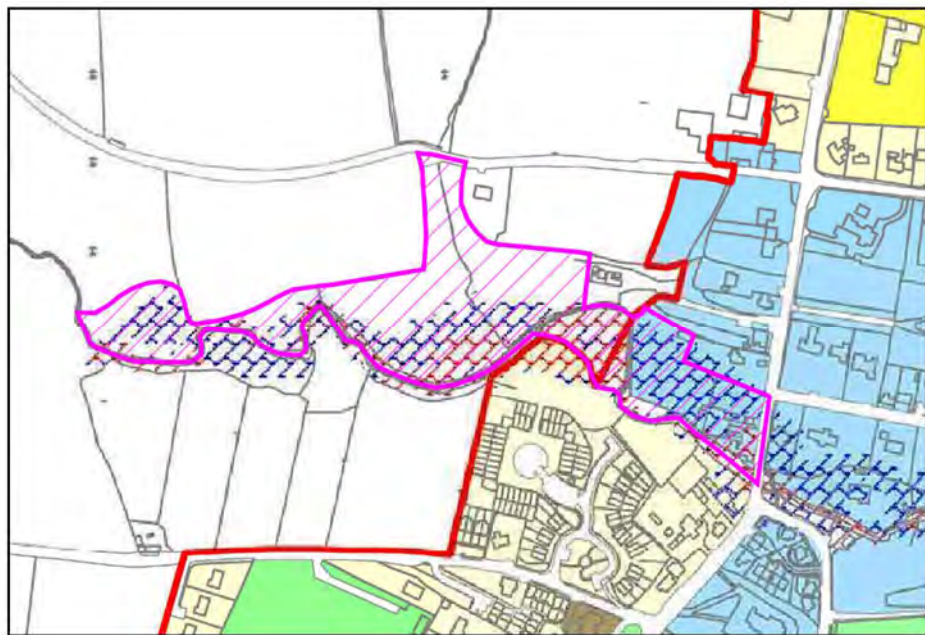


Figure 3 : Draft Louth County Development Plan Land Using Zoning Map

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.

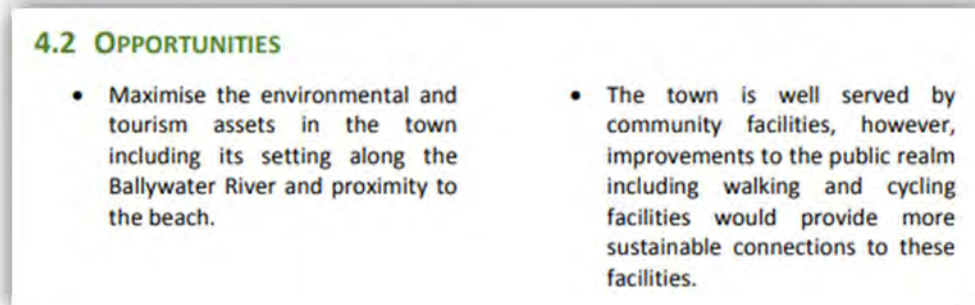
The written statement for Termonfeckin, in its introduction notes that Termonfeckin has a 'rich history' and a 'strong sense of place.' A disconnect is noted between what was considered to be the former village centre (Pub/Restaurant at Ballywater River) and the shop/credit union on Big Street.

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

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 is a cookery school, wedding venue, home of an international Harp Festival, and home of the ICA. 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. Whilst this is true, there is a vulnerability surrounding the singular nature of many of these facilities, and lack of alternatives. The future of these services and their ultimate viability is threatened by the lack of vision and the highly restricted population growth target.

Finally, the written statement ends with a number of specific policy objectives. We respectfully suggest that there is no clear vision for the settlement, and nothing to differentiate it from the other level 3 settlements. These '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. As it stands, there is little or no opportunity to develop services and employment options without identifying suitable sites and making them available.

2. Core Strategy and Housing Allocations

The table below summaries 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%. It is proposed to grow the populations of Ardee and Dunleer by almost 40%. This contravenes National Policy Objective 9 (limits such growth to 30% except for specific settlements). By contrast the plan seeks limit the growth of the Self-Sustaining Towns to 13.8%. 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 the Housing Allocations provided for in the open countryside and that the level of residential development that can be delivered in Level 3 Settlements, be increased accordingly. This would accord with national and regional policy and at the same time consolidate settlements like Termonfeckin, allow it to protect and grow existing community infrastructure and attract new opportunities. These level 3 settlements would then have the opportunity to truly become 'Self Sustaining Towns'.

We would draw your attention to The National Planning Framework. It 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 towns and villages is protected.

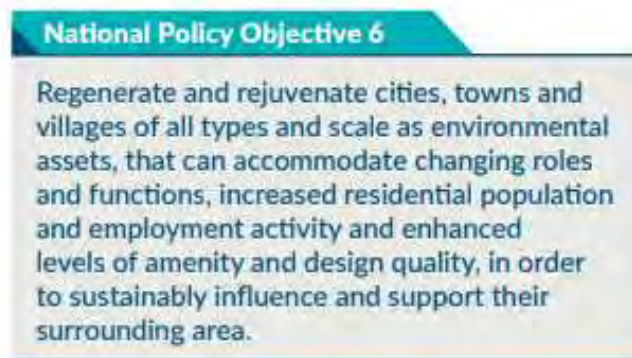
The NPF creates a new emphasis on avoiding sprawl and continual expansion and providing for compact development and the role of smaller villages is acknowledged in his regard.

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 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. We contend that there are enough houses in the rural open countryside to meet these particular needs without building more.

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 simply 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 3times 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 the unintended consequence of this is to hand over 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.

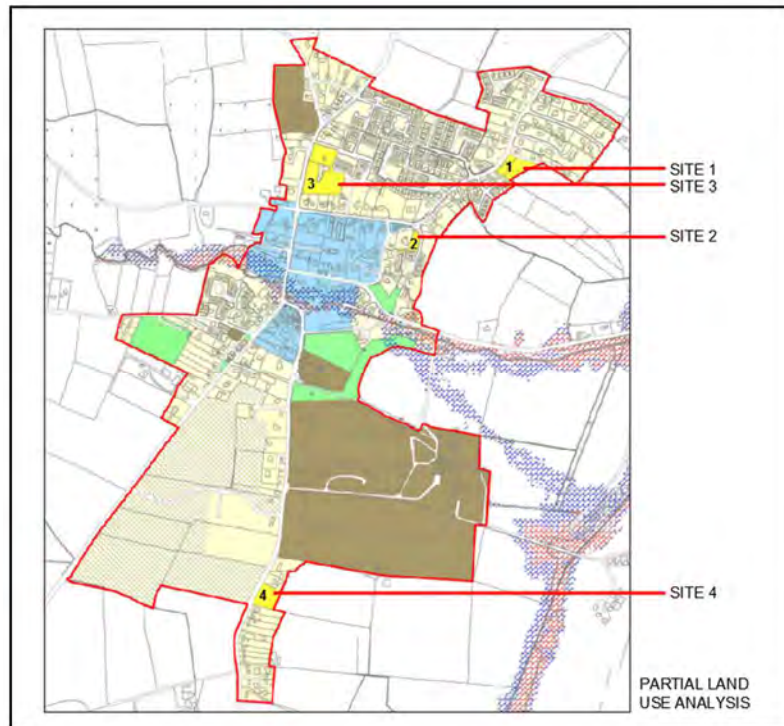


Figure 4 : Draft Land Use Zoning Map – A2 Zoned Lands

- Site 1 comprises approximately 0.51H, 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 approximately 0.16 Ha. The site is owned by the same person who owned the land on which Brabazon Hall. Respectfully, we contend that had the owner intended to 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. 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. Much of the village centre lands are either built on, in private mature gardens or shown as being within Flood Zoned B.

5. Flood Zones

The land use zoning map for Termonfeckin includes flood Zones A and B. The mapping behind it is out of date and shows an incorrect alignment of the river through our client's property. See map below which shows the river alignment in orange. The actual alignment is shown in green.

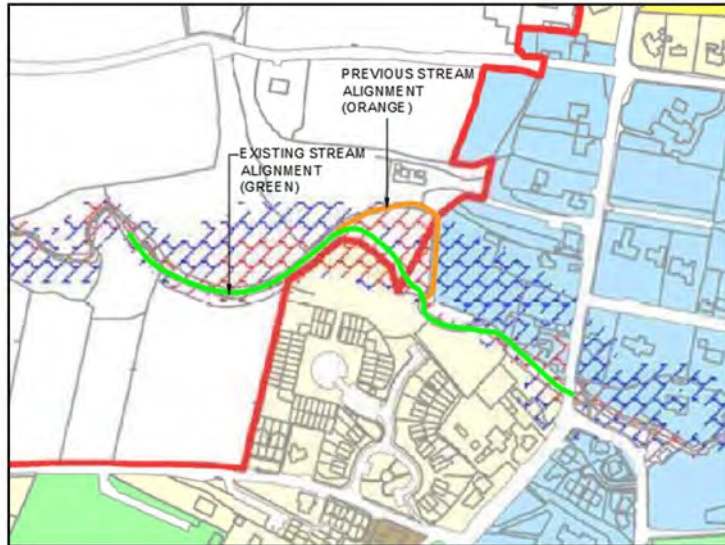


Figure 5 : Draft Louth County Development Plan Land Using Zoning Map – Existing Stream Alignment

OPW Flood Mapping for the area is also based on this old stream alignment and accordingly Flood Zones A and B are out of date and not based on up-to-date information. See CFRAM map below with previous and existing alignments shown.

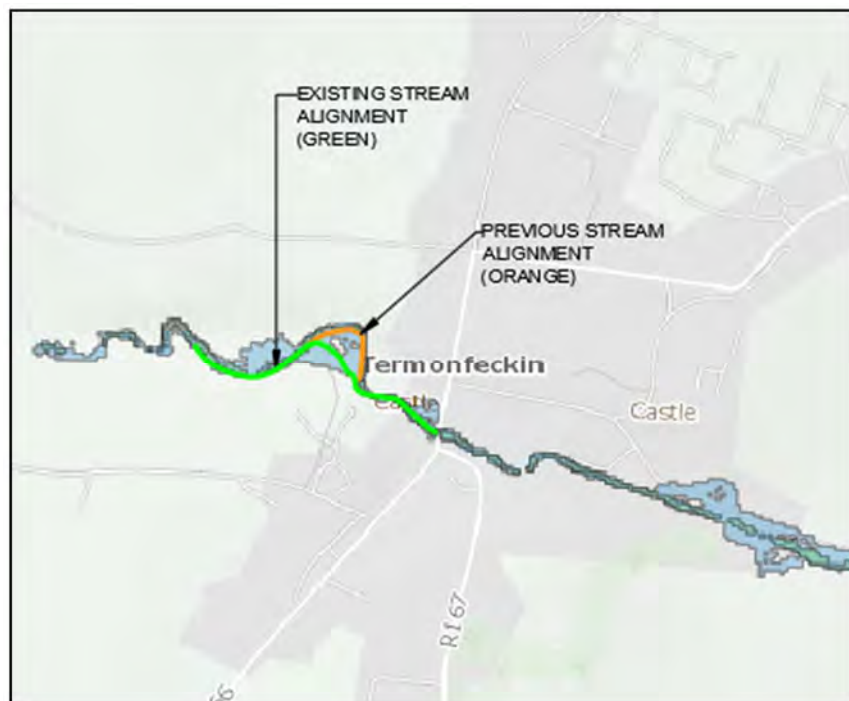


Figure 6 : OPW Flood Maps – Existing Stream Alignment

The Satellite image below shows the existing and previous alignments for reference. The change in alignment potentially has a significant impact on the development potential of our clients already zoned and adjoining lands.

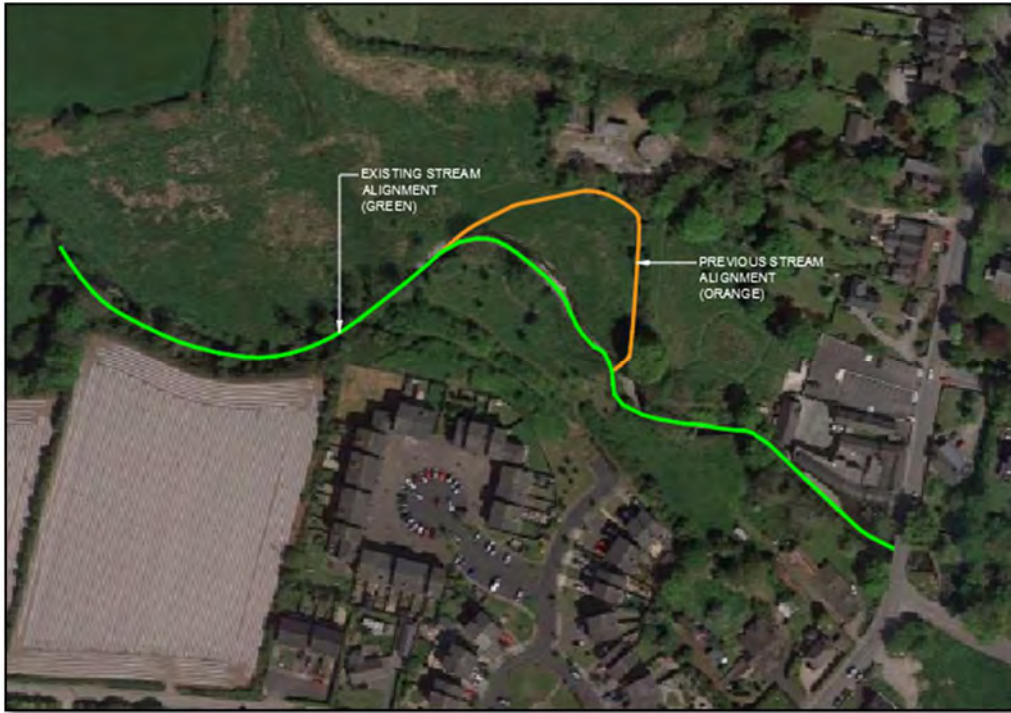


Figure 7 : Aerial Photo - Existing Diverted Stream

Requested Changes:

1. Growth targets for Self Sustaining Growth Towns should be reduced from approximately 40% and the growth targets Termonfeckin and other level 3 settlements increased accordingly. The Housing Allocation for Termonfeckin should be increased to give Termonfeckin equal potential for growth to the other Level 3 settlements like Castlebellingham and Tullyallen.
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 should be provided in the written statement for Termonfeckin in this regard.
3. Land Use Zoning Map/Composite Map to be amended as shown below in Figure 8

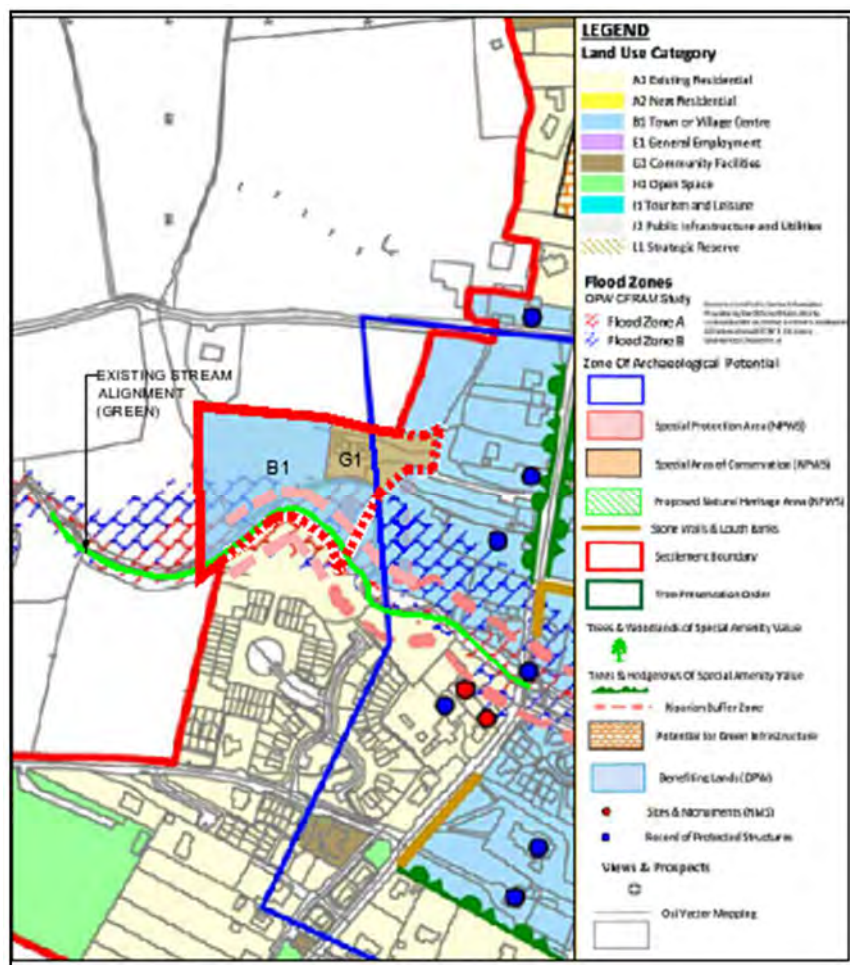


Figure 8: Proposed Amended Land Use Zoning Map/Composite Map

This will result in an additional gross area of 0.86ha B1 zoned land for village centre development. An indicative layout of how this might be developed is suggested below (and copy attached).

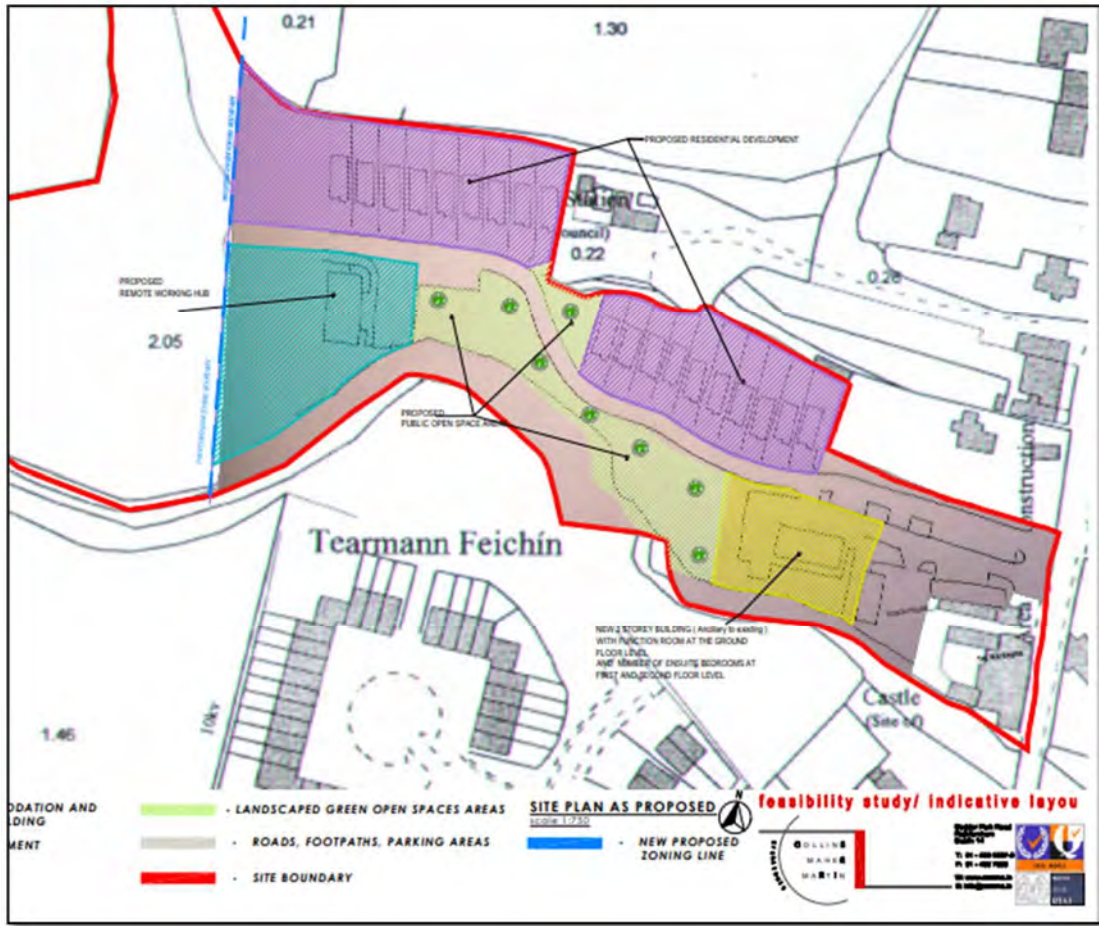


Figure 10 – Indicative Layout of Development of Subject Lands

4. A statement should be provided in the Written Statement for Termonfeckin which would provide for flexibility in relation to the inaccurate and out of date flood mapping. Such a statement should acknowledge that the mapping is inaccurate. The statement should ensure that the planning authority can consider appropriate flood path modelling and evidence-based justification accompanying planning applications to build in areas identified on the land use zoning map for the settlement as being at risk.

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

Encl – Collins Maher Martin Drawing