



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

18th December 2020

**RE: Draft County Development Plan 2021 – 2027
Submission on behalf of Mr Gerard Reilly regarding 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 Mr Gerry Reilly to make this submission on his behalf.

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

Background:

Mr Reilly is the owner of a plot of serviced zoned land adjacent and contiguous to the town boundary on the Coast Road, Termonfeckin. The plot of land extends to approximately 1.25H (3 Acres) and it is shown in figures 1, 2, and 3 below.

Mr Reilly's own recent experience is that he downsized himself from a large 4 bed house to a 2 bed bungalow more suitable for his changing need. His son moved into the 4 bed house with his younger family, a house better suited to family occupation. Our client's personal experience led to the realisation that there is a very real lack of options for older persons to acquire appropriate affordable housing as their needs change.

Our clients feel that the Draft County Plan 2021 – 2027 should be amended before it is adopted to take account of the following:

- The written statement for Termonfeckin should include an objective to provide for sheltered housing specifically for older people.
- Termonfeckin's Housing Allocation of 41 units within the plan period is disproportionately low when compared with other Level 3 settlement towns and this should be raised accordingly. The lands identified for this in the Draft Land Use Zoning Map are not capable of delivering it.

- The development boundary of Termonfeckin should be extended to include our clients lands (identified in figure 1) and these lands should be appropriately zoned to allow for the construction of a sheltered housing scheme for older people i.e. 'G1 Community Facilities'.

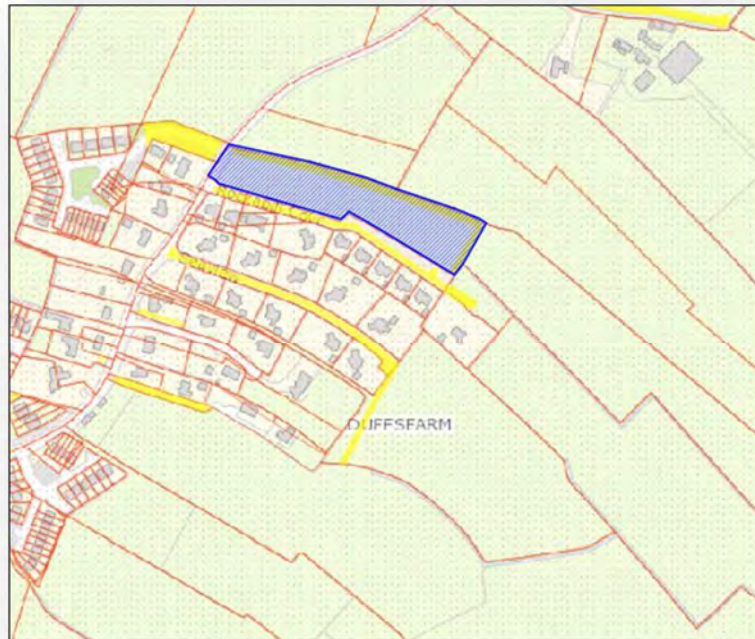


Figure 1 - Land Ownership

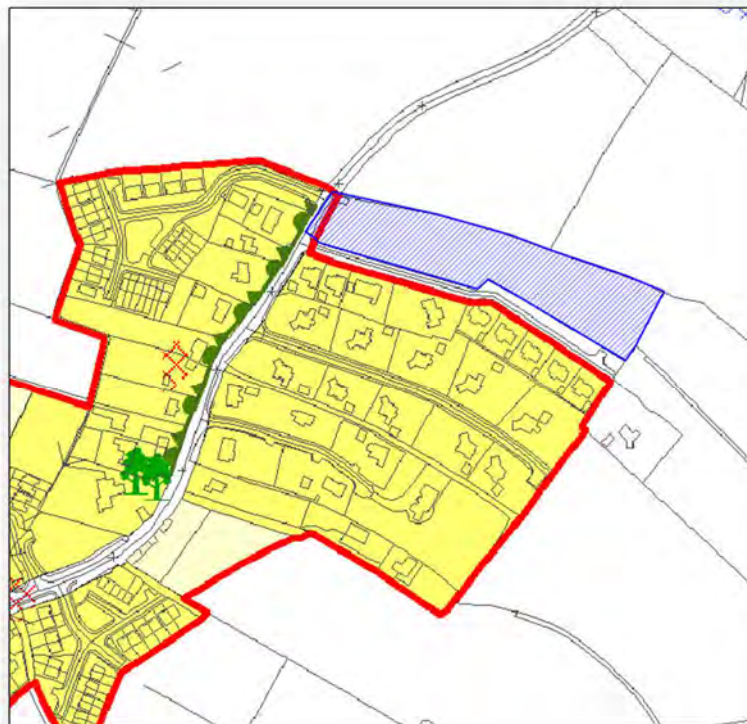


Figure 2 - Current Land use Zoning map

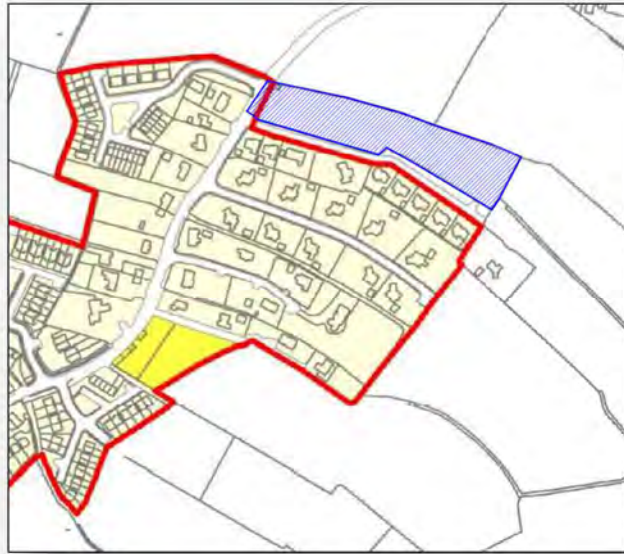


Figure 3 - Draft Land Use Zoning Map

Key Issues:

Issue 1. Aging Population, and Housing Demand and Planning Policies.

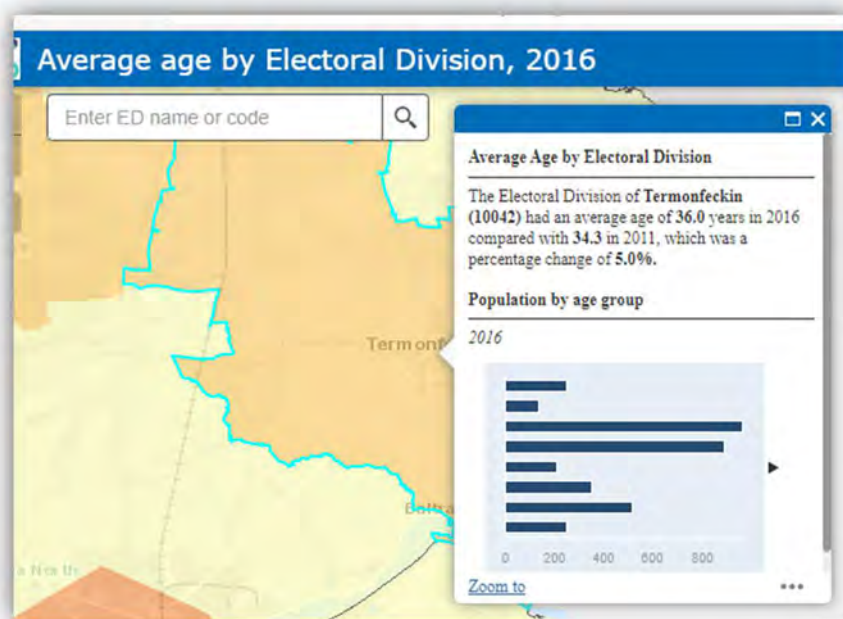


The population of people in Ireland aged 65 and over is expected to increase by a third over the next 8 years, and to double over the next 25 years. This was the subject of the 'HOUSES OF THE OIREACTAS Joint Committee on Housing, Planning & Local Government, Housing Options for Older People report (published June 2018).

The Chair of the Joint Committee noted in her preface that research indicates that older people wish to stay in their own home and community for as long as possible. Over time older people's homes may become unsuitable as they require more care and support. Current alternative housing options for older people are extremely limited and the report notes that this lack of choice can result in unnecessary admissions to long-term care settings (nursing home), with its associated costs. Developing options for older peoples' supported housing can provide a viable alternative in many cases.

2016 Census information for the Termonfeckin Electoral division shows that the average age of the population in Termonfeckin has increased by 5%. The number of people in the settlement in the older age brackets (as per 2016) are as follows:

- Age 45-64:961
- Age 65-69:134
- Age 70+: 245



It is our understanding that there is a considerable demand for social housing in Termonfeckin with several hundred on the housing waiting list. 10% of those on the list are over 55, and over 2/3rd of that demand is for 1 and 2 bed units. The Draft Plan, with respect, does nothing to address these specific needs.

1.1 National Planning Framework

The National Planning Framework Ireland 2040 has identified housing for older people as a particular issue that needs addressing and has set out various objectives in this regard. It should be noted that this important national policy documents states clearly that:

Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible. In providing a more seamless and appropriate continuum of housing choices with appropriate supports for older people and a built environment that is attractive, accessible and safe, older people will be supported and motivated to enjoy more active, healthy and connected lives and to age confidently and comfortably in their community.

The following national policy objectives are particularly relevant.

National Policy Objective 30

Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

National Policy Objective 34

Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

1.2 EMRA Regional Planning Policy

The theme of providing for the needs of an ageing population in the region is repeated in the East Midlands Regional Authority's Regional Spatial and Economic Strategy in Chapter 9 which includes the following regional policy objective:

RPO 9.1: Local authorities shall ensure the integration of age friendly and family friendly strategies in development plans and other relevant local policy and decision making, including provision for flexible housing typologies, buildings and public spaces that are designed so that everyone, including older people, disabled people and people with young children can move around with ease, avoiding separation or segregation.

Both the National and Regional published planning strategy documents require that County Development Plans should provide for flexible housing solutions to provide for older people.

1.3 Draft County Development Plan 2021 – 2027

Section 3.8 '*Housing for Older*' People of the Draft County Plan takes up the challenge set by National and Regional policies. Louth County have undoubtedly been proactive in this regard and has been much lauded for 'The Louth Age Friendly Strategy' in the past and this document is referenced in Section 3.8. Furthermore, and helpfully, the policy statement 'Housing Options for our Aging Population' prepared by the Department of Housing, Planning and Local Government and the Department of Health is referenced too and included in Policy Objective Hou12:

HOU 12: To support the implementation of the Policy Statement 'Housing Options for Our Ageing Population' and the provision of independent and/or assisted living for older people such as purpose built accommodation, the adaption of existing properties, and opportunities for older people to avail of 'rightsizing' within their community at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.

In the Section on 'Developments to Date, the policy statement referred to at HOU 12 notes that '*The Department of Housing, Planning and Local Government supports the ongoing provision of housing for older people through various schemes under its housing capital*

programme, including the Capital Assistance Scheme (CAS) which provides funding of up to 100% to Approved Housing Bodies (AHBs) for the provision of sheltered housing accommodation to meet the needs of people requiring specific categories of housing, such as older people and people with a disability.'

Section 4.12.1 of the Draft C.D.P. acknowledges the increasing demand for the provision of residential care, retirement and nursing homes, retirement villages and sheltered accommodation within the County. It defines sheltered accommodation as *housing schemes with on-site communal facilities for assisted independent living. Sheltered housing schemes usually have an on-site warden and include care supports such as the provision of meals and health care assistance. Communal on site facilities can include recreation areas, alarm systems and a laundry.*

The county Plan includes a specific policy objective 'requiring' that traditional care provision is located in settlements and not in the countryside (see SC40 below). This policy objective seeks to limit where such housing options for older people might be provided rather than seeking to encourage its provision.

Policy Objective	
SC 40	To require that Residential Care, Retirement and Nursing Homes, Retirement Villages and Sheltered Accommodation be located in Level 1, 2, 3 and 4 Settlements for reasons of sustainability, accessibility, social inclusion and proximity to services. In exceptional circumstances and where considered suitable, the re-use and conversion of existing buildings shall be considered.

Finally, when we look specifically at Termonfeckin, Section 2.3.2 of the Draft Plan describes Louth's Settlement Hierarchy and defines 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 section on Louth's growth strategy (Section 2.4.4), we note that it is intended to support self-sustaining towns requiring contained growth, investment in service delivery whilst balancing housing delivery.

Section 2.5.2 of the Draft C.D.P. notes that the fact 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.

1.4 Draft Written Statement for Termonfeckin Vol. 2 Draft C.D.P.

The written statement for Termonfeckin, includes an overview of the settlement, provided at Table 4.1 and this is 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 Draft 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: *'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.'*

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 notes in section 4.9 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 which functions as a cookery school, wedding venue, home of an international Harp Festival, and home of the ICA is mentioned. 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. The small population of Termonfeckin is well positioned in terms of community and social infrastructure, but a weak employment base is noted.

The section in the Termonfeckin written statement on Housing (Section 4.3) is short and makes no reference to the settlement's role with respect to provision of housing options for older people or how HOU 12 might actually be realised.

Issue 2. Core Strategy and Housing Allocations

The Draft County Plan has a housing allocation of just 41 new residential units for Termonfeckin over the plan period. It is our view that this allocation is too low. It is joint lowest of the five Level 3 settlements, despite having the second highest population.

Castlebellingham gets double the allocation, Clogherhead gets 3.5 times Termonfeckin's allocation and Tullyallen nearly three times more. The table below summarises the Core Strategy allocations for the five level 3 Settlements

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
Population increase if target achieved.	250	200	110	300	220
Population increase target as a % over 2016 census figure	15.8%	13.8%	9.8%	14.0%	14.2%

You will note that whilst it is intended to grow Termonfeckin's population by the biggest percentage change, it gets the lowest unit allocation, Given extant permission for 56 units not built, plus the allocation of 41, that gives a total of 97 units that could be built between now and 2027 in the village, to support a population increase of 250 units. This means that an average occupancy of over 2.5 must be achieved. This means that if one and 2 bed units are built in order to meet a shortfall in those typologies best suited for older people, then the targets cannot be met.

It is our view that if the settlement of Termonfeckin is to reach its potential and perform its role as a self-sustaining town, then it should be allow to grow naturally and not be unduly constrained. It should at least be afforded the same opportunities as other town at Level 3 in the settlement hierarchy.

Issue 3. Proposed Land Use Zoning

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

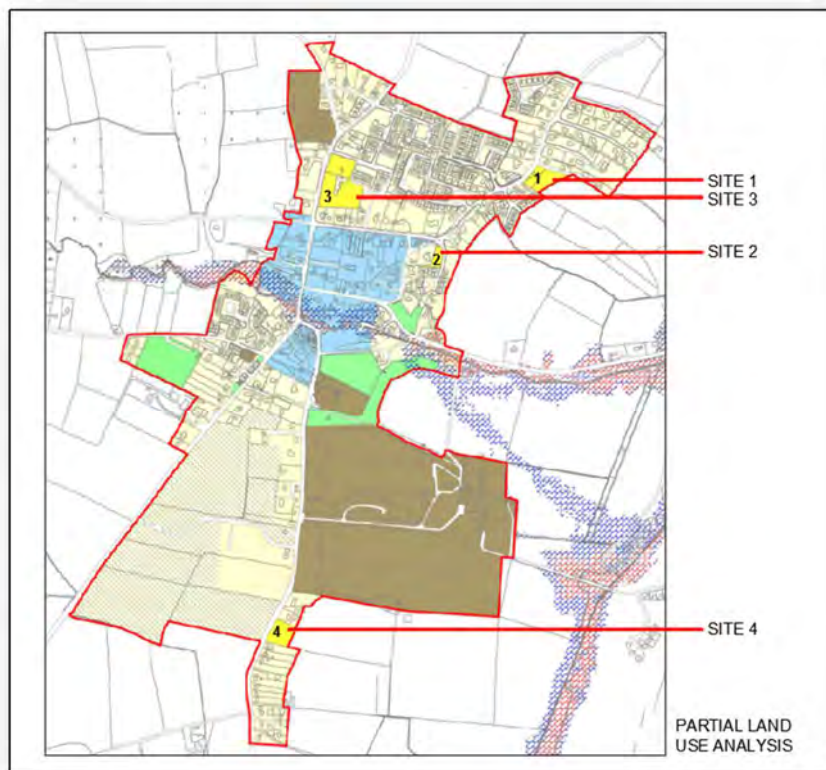


Figure 4 - Draft Land Use Zoning Map – A2 Zoned Lands

- Site 1 on Coast Road comprises approximately 0.51H, is an awkward shape and probably the most readily developable with potential to deliver perhaps 10-12 units.
- Site 2 is at the entrance to Barbizon Hall and measures approximately 0.16 Ha. 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 development 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, and accordingly there isn't enough land zoned to deliver the targeted growth. 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.

The fact that so little land is available for new residential development means that these sites will be highly sought after because the owners now effectively control any and all of this scarce resource in an area of high demand. As such, it is highly unlikely that any of these lands will become available for social housing or sheltered housing for older people.

Requested Changes

As indicated in the introduction, our client owns approximately 3 Acres of zoned serviced land on the edge of the village and we respectfully request that this land is included within the development boundary and zoned G1 Community Facilities.

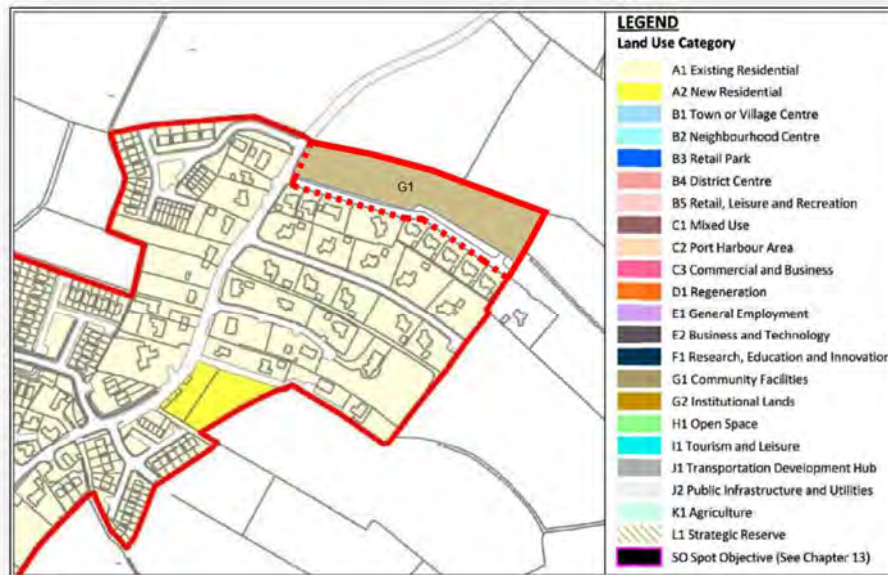


Figure 5 – Proposed Amended Land Use Zoning Map

It is our clients wish to partner with an approved housing body, to deliver a sheltered housing scheme on this land which could provide for multiple purpose designed and managed residential units for older people. Recent examples of this type of development that have been through planning permission stage include a scheme of 22 units for 'older people and persons with limited mobility' in Duleek Co. Meath (Planning Reference LB200127). The grant of permission in this instance included a condition restricting the occupancy of the scheme as follows:

2. Prior to commencement of development, the applicant shall enter into an agreement with the Planning Authority pursuant to section 47 of the Planning and Development Act 2000-2019 providing that the occupancy of the units shall be restricted to persons aged 55 years or older or to persons with a certified medical need for sheltered housing and spouses or partners of such persons.

Reason: To ensure that the proposed development is used as specified in the submitted plans in the interest of proper planning and sustainable development.

Another example of a specifically designed scheme for older persons is at Stradbally Co. Laois. Planning reference 17403 included for '16 older person dwellings' and the following condition was applied to ensure that the occupancy was appropriately controlled.

1.

[a] The development shall be carried out in accordance with plans and particulars received by the Planning Authority on 26/07/17, as amended by revised plans and particulars received on 21/11/17 except where conditions hereunder specify otherwise.

[b] The proposed dwellings shall only be occupied by older persons. A Section 47 Agreement [under the Planning and Development Act 2000 as amended] to this effect and specifying qualifying ages etc shall be entered into by the Developer with the Planning Authority prior to commencement of development.

[c] Written details of an ongoing management and on-going maintenance agreement for the proposed development including in relation to services, infrastructure, parking and open space areas shall be submitted to and agreed in writing with the Planning Authority prior to commencement of development.

[d] No material change of use shall take place without prior planning permission.

Reason: In the interest of the proper planning and sustainable development of the area.

We believe that our client, together with an approved housing body could deliver a similar type of scheme on this appropriately located serviced land in a Level 3 Settlement. It is suggested that the subject lands are ideally suited for an older person's development as the land is located within walking distance of local amenities and being adjacent to an existing residential settlement and that can provide an appropriate social mix for social integration and inclusion.

Socially diverse local communities located in well-planned development can foster a sense of place, pride, security and neighbourliness. It is important that new housing development and existing settlements foster and secure a good social mix.

The proposal would accord with the principles of sustainable transport set out in the National Planning Framework and Regional Spatial and Economic Strategy which promote a shift from dependence on the private car towards more sustainable modes of transport including public transport, walking and cycling. The land is located in Termonfeckin village within walking distance to all local amenities and located on the No. 189 bus route to Drogheda town centre.

A high standard of design can be achieved that could create its own unique "sense of place" by providing a bespoke design that would take cognisance of the existing topography of the site, the existing settlements and heritage of Termonfeckin village. The design will be guided by government policy guidance like Homes for Smart Ageing Universal Design Challenge and Housing Options for Our Ageing Population.

The sketch below shows how a scheme might be arranged making use of the existing access road to Rockabill Cove whilst maintaining a setback from the existing residences there. A low density, low rise permeable scheme can provide a real sense of place and enclosure whilst respecting the existing residence there. A central linear park can provide a comfortable overlooked sheltered outdoor space for future residents along with existing residents. One of the buildings suggested can be reserved for community facilities and for management functions if required.



Figure 6 – Indicative Sketch Layout of Development of Subject Lands



Figure 7 – Reference Projects for Older Person Houses

Summary of requested changes:

1. Extend the development boundary to include our clients lands within the settlement.
2. Zone our client's lands 'G1 Community Use' so as to allow for the development of a sheltered housing scheme for older people at this location.
3. Increase the core strategy housing allocation for the settlement of Termonfeckin to provide an equitable level of development when compared with other Level 3 Settlements.
4. Include a statement in the Termonfeckin Written Statement at Section 4 of Volume 2 to reflect the general policy expressed through HOU 12 in Volume 1 of the Draft CDP
5. Include a policy objective in Section 4.11.1 with the following wording:

TER 5: To secure and encourage the development of residential developments specifically designed for older persons and those with limited mobility on lands zoned for community use on the coast road.

In conclusion, we would respectfully request that you take the foregoing into account and make the necessary changes to allow for the development of our client's land in the manner outlined.

Yours Faithfully

Brian Hughes
BA BAI CEng MIEI,
Chartered Engineer