

Submission to
Louth Draft County Development Plan
2021-2027

On behalf of

Age Friendly Alliance Louth
Older People's Forum Louth
EU_SHAFE Local Action Group Louth



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Comments

This submission is made on behalf of the Louth Age Friendly Alliance, the Older People's Forum, Louth and the Louth EU_SHAFE Local Action Group. Louth's Age Friendly Alliance and the Older People's Forum operate with the County Age Friendly Programme structure. The Age Friendly County Programme is affiliated to the World Health Organisation's Global Age Friendly Cities Network and the EU Covenant on Demographic Change which is chaired by Louth County Council's Chief Executive, Ms. Joan Martin. EU_SHAFE is a European Consortium of 10 partners from 7 different European countries who are currently examining the alignment of policy in relation to Smart Health Age Friendly Environments.

The Age Friendly Programme seeks to make life in our communities better for all of our citizens regardless of age. This means applying age friendly standards across services in the county from the cradle to the grave. While age friendly principles apply across the age spectrum, in this submission we have specifically looked at age proofing the Louth County Development plan in terms of our older persons.

The Louth Draft County Development plan is a well constituted document broken down into the relevant topics of:

- Core Strategy and Settlement
- Housing
- Social and Community
- Economic and Employment
- Tourism
- Transport and Infrastructure
- Natural heritage and Bio-diversity
- Built Heritage and Culture
- Utilities
- Environment and natural resources
- Climate Action and;
- Development Management Guidelines.

Underpinned throughout by the relevant National and Regional policies, the Draft County Development Plan is further bolstered by the Age Friendly County Plan, the Louth LECP and the Louth Housing Strategy.

Actions

This submission recommends the following adjustments and changes to the Louth Draft County Development Plan 2021 – 2027.

General Actions

Language

There are some slight corrections which can be made to the language used by replacing the word “elderly” where it appears with “older persons”. The word elderly conveys a homogenous group of people with connotations of dependency and frailty while “older persons” can mean people who are independent and active or those individuals who may need more help to those older persons who need more sustained care with their day to day living.

Recommended Change to text

All instances of the word “elderly” should be replaced with “older persons”.

Recommended Change to text

Where the phrase “older people” (e.g. “Housing for Older People”) is used this should be replaced with “older persons”

Throughout the Draft County Development Plan there are instances where the language around Age Friendly could be strengthened. Making these adjustments would enhance and consolidate Louth’s premium Age Friendly credentials. The following are some examples of where the addition of a phrase could positively strengthen the Plan:

Chapter 1 – Introduction

Strategic Objective 9

Protect and enhance the unique character and identity of Louth’s towns and villages and improve quality of life and well-being through the application of Healthy Placemaking, underpinned by good urban design with the creation of attractive public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate positive social interaction

Recommended Change to text

Protect and enhance the unique character and identity of Louth’s towns and villages and improve quality of life and well-being through the application of Healthy Placemaking, underpinned by good urban design with the creation of attractive public spaces that are **age friendly**, vibrant, distinctive, safe and accessible and which promote and facilitate positive social interaction

Chapter 2 – Core and Settlement Strategy

2.14.5 – Residential Development

Residential development will focus on the delivery of high quality designed buildings and spaces that can meet the housing needs of all members of the community and provide connectivity and permeability between existing and future neighbourhood areas. In order to achieve compact growth

higher density developments will be required, particularly on centrally located lands or lands well connected to the town centre. (Dundalk)

Recommended Change to text

Residential development will focus on the delivery of high quality designed buildings and spaces that can meet the housing needs of all members of the community **regardless of age or ability** and provide connectivity and permeability between existing and future neighbourhood areas. In order to achieve compact growth higher density developments will be required, particularly on centrally located lands or lands well connected to the town centre. (Dundalk)

The Draft Plan supports the delivery of affordable homes including a mix of house types and tenure suitable for all life stages

Recommended Change to text

The Draft Plan supports the delivery of affordable **and adaptable** homes including a mix of house types and tenure suitable for all life stages

Chapter 3 – Housing

Policy Objective HOU10

To continue to support the creation of sustainable communities throughout the County by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where walking, cycling, and public transport is prioritised

Recommended Change to text

To continue to support the creation of sustainable communities throughout the County **for people across all the life stages** by facilitating the creation of attractive neighbourhoods where there are strong links and connections to local services, community facilities and employment areas and where walking, cycling, and public transport is prioritised

Policy Objective HOU26

To require the provision of an appropriate mix of house types and sizes in residential developments throughout the County that would meet the needs of the population and support the creation of balanced and inclusive communities

Recommended Change to text

To require the provision of an appropriate mix of **lifetime adaptable** house types and sizes in residential developments throughout the County that would meet the needs of the population and support the creation of balanced and inclusive communities

Chapter 4 – Social and Community

Policy Objective SC8

To support the planning provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities have access to a range of facilities that meet the needs of the communities they serve, are physically integrated with

residential and employment areas and are provided concurrently with new residential development.

Recommended Change to text

To support the planning provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities **and all ages** have access to a range of facilities that meet the needs of the communities they serve, are physically integrated with residential and employment areas and are provided concurrently with new residential development

Chapter 5 – Economy and Employment

5.13.5 – Creating an Attractive Public Realm

As part of the strategy of creating an attractive environment for people to live and work, the Council is in the process of implementing a Public Realm improvement project in the centre of the town. This includes improvements to the streetscape, replacement of street furniture and landscaping, with the objective to improve access for people in the town centre whilst also retaining ease of access for buses, cyclists, and cars.

Recommended Change to text

As part of the strategy of creating an attractive environment for people to live and work, the Council is in the process of implementing a Public Realm improvement project in the centre of the town. This includes **age friendly** improvements to the streetscape, replacement of street furniture and landscaping, with the objective to improve access for people in the town centre whilst also retaining ease of access for buses, cyclists, and cars.

5.24 – Town Centre First Approach

The Council will seek to ensure that town centres become more attractive and greener environments, that are easily accessible, legible and which give people confidence to visit the centres.

Recommended Change to text

The Council will seek to ensure that town centres become more attractive and greener environments, that are **age friendly**, easily accessible, legible and which give people confidence to visit **and live in** the centres.

As already indicated at the beginning of this section, these are only a few examples from the Draft County Development Plan where small changes to the text can have a big impact in applying the Age Friendly ethos in County Louth. Other examples can be given if requested.

Specific Actions

These actions refer to specific recommendations in relation to advancing the Age Friendly ethos within the County, creating a better place to live for all our residents and a premium Age Friendly destination for people who move to the county in the future regardless of age.

Chapter 3 – Housing

3.8 Housing for Older People.

As part of the strategy of consolidation and compact growth, there will be opportunities for the redevelopment of infill and brownfield land in central areas of towns and villages. Such lands may be suitable for accommodation for older people.

Recommended Change to text

As part of the strategy of consolidation and compact growth, there will be opportunities for the redevelopment of infill and brownfield land in central areas of towns and villages. Such lands **will be prioritised for** accommodation for older **persons**.

Policy Objective HOU27

To require the provision of single storey properties in residential developments in excess of 100 units at a rate of at least 1% single storey units per 100 residential units unless it can be demonstrated by evidence based research carried out by an appropriately qualified professional that there is no demand for this type of accommodation

Recommended Change to text

To require the provision of single **floor** properties in residential developments in excess of 100 units at a rate of at least **5% single floor** units per 100 residential units unless it can be demonstrated by evidence based research carried out by an appropriately qualified professional that there is no demand for this type of accommodation

Single floor properties or units can apply to both apartments and houses and therefore has a broader reach in terms of Age Friendly housing options. The 5% rate of single floor properties accounts for not only wheelchair users but for people with limited mobility. As the life span of buildings in Ireland is 50 years

(https://publications.jrc.ec.europa.eu/repository/bitstream/JRC110082/report_d1_online_final.pdf), and given the projected increase in older persons in the coming years, these buildings need to remain suitable for older persons over all of the life stages, allowing them to age in place.

Policy Objective HOU29

To seek that all new residential developments in excess of 20 residential units provide for a minimum of 5% universally designed units in accordance with the requirements of 'Building for Everyone: A Universal Design' published by the Centre for Excellence in Universal Design

In line with Action 4.6 of the policy document “Housing Options for our Ageing Population” the following change to the text is recommended

Recommended Change to text

To seek that all new residential developments in excess of 20 residential units provide for a minimum of 30% universally designed units in accordance with the requirements of ‘Building for Everyone: A Universal Design’ published by the Centre for Excellence in Universal Design

Housing Strategy

6.1 Housing Strategy Objectives

To support the development of quality residential schemes with a range of housing options having regard to the standards, principles and any specific planning policy requirements (SPPRs) set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009); Urban Development and Building Heights Guidelines for Planning Authorities (2018) and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018).

Recommended Change to text

This submission would ask that the policy document “Housing Options for our Ageing Population be referenced here also.

These are the policies listed in the contents of the Housing Strategy, Annex 3:

2.0 Strategic, Legislative and Policy Landscape

2.1 National Legislation and Planning and Development Act 2000

The Planning and Development (Housing) and Residential Tenancies Act 2016

Urban Regeneration and Housing Act 2015

Project Ireland 2040 National Planning Framework

Implementation Roadmap for the National Planning Framework

Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities

Rebuilding Ireland Action Plan for Housing and Homelessness, 2016

National Vacant Housing Reuse Strategy 2018-2021

Social Housing Strategy 2020: Support, Supply and Reform

The National Housing Strategy for People with a Disability 2011-2016 (as extended)

Recommended Change to text

This submission would ask that the policy document “Housing Options for our Ageing Population be referenced here also.

Chapter 13 – Development Management Guidelines

13.9 Housing

13.9.1 Guidance Documents for housing developments in Urban Areas

Again this section does not mention “Housing Options for our Ageing Population”.

Recommended Change to text

This submission would ask that the policy document “Housing Options for our Ageing Population be referenced here also

13.9.13 Dwelling design, size and mix

Residential units in excess of 100 units will be required to provide at least one single storey unit for every 100 residential units unless it can be demonstrated by an appropriately qualified professional that there is no demand for this type of accommodation.

Recommended Change to text

Residential units in excess of 100 units will be required to provide at least **five single floor units** for every 100 residential units unless it can be demonstrated by an appropriately qualified professional that there is no demand for this type of accommodation.

13.9.27 Design Standards for new apartments

Private amenity space shall primarily be accessible from the main living area in the form of balconies/terraces

Recommended Change to text

Private amenity space shall primarily be accessible from the main living area in the form of balconies/terraces. **Covered balconies or “Winter Gardens” shall be considered for apartments for older persons.**

Conclusion

Overall, we find that the Louth Draft County Development Plan is a robust document addressing the future development of the county over the next 7 years. However, we would respectfully submit that as the first Age Friendly County in Ireland there is an onus on us to lead the way in implementing Age Friendly policies across all the services in the county. In practical terms this means looking at policy through an Age Friendly lens and creating a county where people live, work, visit and retire to safe in the knowledge that the county provides for everyone across all of the life stages. We welcome the appointment of the Housing Specialist under the Housing Options for our Ageing Population and launched last week by the Minister for Housing, Planning and Local Government and look forward to working with them in the future.

Thank you for taking the time to consider this submission and please do not hesitate to contact me should you require any further information on any of the suggested changes.

Grainne Cumiskey
EU_SHAFE Project Co-ordinator
Louth County Council