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## **Draft Louth County Development Plan 2021-2027**

A Chairde,

As part of the consultation phase of the *Draft Louth County Development Plan 2021-2027*, please see the following submission from Louth IFA.

- **Chapter 3 – Housing - 3.17.4 Rural Generated Housing Need**

Louth IFA see a number of issues with Louth County Council's proposed zoning and planning policy. In Zone 1 (as per the proposed plan) a farmer (and possibly one other family member) will get planning permission for a dwelling, subject to the usual conditions and on submission of proof of full-time farming activity plus they must fulfil the requirement of living in the community and have owned the land for at least 10 years. This has the propensity to destroy rural life and the provision/maintenance of facilities necessary to support family life. In that time the future of the local school, church and local shops is endangered and will, in time, mean that these services necessary for rural living will no longer exist. The age profile of farmers now is one of the main reasons why workplace accidents are higher in farming than in any other industry. Unlike their fathers and grandfathers, who worked with one or two employees, they are farming alone, those who have their successor working with them, which is happening mostly in dairying, are equally anxious to have sons or daughters living close to the farmyard, so that they can be quickly available in emergencies, or anytime a few more hands are needed. This blanket type of move proposed by the Council will deny those who grew up as part of a rural community from continuing on to regenerate that same community and look after their elderly and otherwise enhance their community.

Irish Water have also recently published their National Water Resources Plan and reading through it there is a burdensome task ahead to get the water and sewage facilities up to the required level if they are to sustain further urban development. We would question Louth County Council's approach in this regard by hindering rural development and encouraging urban growth when the water infrastructure will take some time to get to the necessary standard.

### **Louth IFA Proposal:**

The County Development Plan should not set heritage and conservation against rural people, to the detriment of both. Emphasis should be on facilitating people to live in, and contribute to, the communities where they grew up, whether they wish to raise their families there or to retire back there. Their ancestors have lived there, and they inherit that spirit, of being custodians of their home place. Their ability to settle there enhances the quality of life of the existing community, and benefits the local economy and culture. The sustainability of our educational, commercial, sporting, social & community facilities and the sustainability of farming enterprises in this area is dependent on the facilitation of young local families to settle at home. The need for people to work from home in 2020 led, in the earlier phase, to a 65% decrease in traffic, and in the later phase, when schools returned, to a

35% decrease. The environmental and societal benefit of working at or close to home will be greatly helped by improved broadband roll-out, something Louth County Council should be continuing to seek. The kind of mitigation applied when necessary installations and infrastructural projects are required to be set in sensitive locations can also be applied to dwellings to facilitate rural propinquity.

Instead of trying to sterilize the rural areas, the County Council should strongly encourage the old Clachan system which was socially and economically beneficial to the community. By encouraging a cluster between the farmhouse and nearest neighbours, the different generations create a community that will benefit farming; allow older people to have care and company; allow for home-based childcare; reduce rural isolation and loneliness and contribute to the life of the wider community. It also is environmentally beneficial as group services: communal waste tanks; transport; deliveries and energy supply etc. are made environmentally efficient.

For environmental and social reasons, 'Work Locally' facilities and supports should be encouraged in the new Plan.

Louth IFA feels that the current policy in relation to the development of Control Zone 6 in the present plan, now to be part of Control Zone 1 in the proposed CDP, (World Heritage Site of Bru na Boinne and the sites of Monasterboice and Battle of the Boyne) is overly restrictive and rigid in its implementation. It does not allow for an assessment of individual cases based on their potential impact on these sites. The drawing of a line that divides these areas from the surrounding Control Zones is a very crude instrument when sites immediately adjacent to one another can simply be inside 'Zone 6' or not, with both sites potentially having similar impact but dealt with completely differently in Planning terms. The same rules apply to the entire of the 'Zone 6' areas irrespective of their location or impact on the World Heritage Sites. This will inevitably lead to rural de-population of these areas and will significantly adversely affect the rural communities, including farming, of these locations. We would request that a more individual approach be taken where any site applying for permission in 'Zone 6' is dealt with on an evidence-based assessment where an impact document showing the effect of the development on the World Heritage Sites could be included with the planning application.

In discussions with the Department of Culture, Heritage and the Gaeltacht, they take the reasonable view that a zoning colour on a (flat) map does not take into account the topographical impediments to visibility. In this regard, they are in agreement that sensitivity to the protection of heritage sites and the economic and social sustainability of the farming and rural community are not in conflict and can be complimentary.

We feel very strongly in Louth IFA that the County Council stipulation of needing to have land ownership for ten years before being eligible for planning permission leaves sons and daughters in a farming family at an extreme disadvantage. This policy needs to be discarded as the overlap of generations and the business structure of a family farm make it totally unviable. For example, a farmer's son may look to build a house on the family farm when he is thirty years of age. This would require him to have the land transferred to him when he was twenty. His own father at the time may only be in his fifties, an age far too young to be necessarily transferring the land and business across to the next generation.

We propose that planning permission could be granted, within demonstrable site-specific constraints, and in the spirit outlined above, to the sons and daughters of farming families, and of other local families who want to settle in their homeplace, and to applicants whose occupational or other skills are of significant benefit to the local community. To simplify the onerous application process, not more than one document of proof should be required. The Planning Permission process in general is at present heavily weighed down by excessive "red tape", bureaucracy and hefty expense to the applicant. We stress that this must be drastically cut back.

- **Chapter 8 - Natural Heritage, Biodiversity and Green Infrastructure. Policy Objective NBG 3 - To protect and conserve Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated under the EU Habitats and Birds Directives.**

**Louth IFA Proposal:**

Large areas of the Cooley uplands are designated as a "Special Area of Conservation" (SAC). National parks and wildlife Carlingford Mountain SAC (Cooley mountains) as per their published document at <https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY000453.pdf> recommend that, "*Bracken (Pteridium aquilinum) infests large areas of the lower slopes and in dense patches it grows to the virtual exclusion of other species. Further spread of this species should be prevented.*" Louth County Council should act in line with the policy objective above and develop and implement a plan with local shareholders to control bracken on the Cooley mountains.

Damage caused by increased recreational use in the Carlingford Mountain SAC needs to be acknowledged and a sustainable recreational plan needs to be developed with shareholders and interested parties.

Louth County Council must co-operate with sheep farmers in the Cooley Mountains to ensure that areas designated by the NPWS as SAC are maintained in good ecological condition through the provision of infrastructure and assistance in protecting against encroachment of important natural habitats.

The Cooley IFA Branch is active in the Carlingford Mountain SAC and can be of assistance for both these issues.

- **Chapter 8 – Trees, Woodlands and Hedgerows - Trees, woodlands and hedgerows contribute greatly to Louth's natural landscape character and biodiversity. They provide visual amenity in rural and urban environments, shelter and clean air, important habitats for many species of wildlife and as high biodiversity habitats they are key for both climate mitigation and adaptation measures, playing a significant role in carbon storage.**

#### Louth IFA Proposal:

We endorse the view that trees and hedgerows should and need to be protected but in all references the appreciation of the farmers' input to keeping Louth "Green" and maintaining these hedgerows seems to be overlooked. It is imperative that farming and rural communities are supported so that they in turn can support the rural landscape as they are and have been the custodians of the land for generations. This also feeds into Chapter 8 – Tourism and leveraging off Louth's 'Green' county reputation, it's quality environment credentials and it's recreational, sporting and other activities.

- **Chapter 8 – Table 8.3 Proposed Natural Heritage Areas (pNHAs) - NH1454 Ardee Cutaway Bog**

#### Louth IFA Proposal:

We note that Ardee Cutaway Bog has been proposed as a NHA and yet this is also a proposed route for the Ardee Bypass. We want to highlight the hypocrisy in this decision considering that for years Louth IFA have been trying to get affected farmers of the bog into farming support schemes such as the Area of Natural Constraint (ANC) but to no avail. Louth County Council must ensure that farmers in such areas are supported fairly considering the Council's own willingness to overturn such restrictions when concerning their own projects.

- **Chapter 12 – Climate Action - 10.10 SMALL SCALE RENEWABLE ELECTRICITY GENERATION - Policy Objective IU 66 To promote and facilitate the development of small scale electricity generation installations and green technologies which do not negatively**

**impact on environmental quality, landscape, wildlife and habitats and residential amenities.**

**Louth IFA Proposal:**

On-farm Renewable Energy projects connecting to the grid via the local Substations should be facilitated and encouraged in the new Plan. Farmers could be a great asset to the County and the Nation as a whole in helping meet Climate Change and Emissions targets. Land and shed roof space are already there to make use of for solar, biomass and other renewable energy projects if the farmer was fairly supported and incentivised by local and national government.

Farmers are expected to make changes over the coming years to decrease their use of Nitrogen fertiliser and implement Low Emission Slurry Spreading Equipment in their operations. This will help to decrease Ireland's carbon emissions. These can be successfully met but only with financial support from local and national government.

A further Renewable Energy initiative that would be beneficial for the County Council to action would be the use of Anaerobic Digesters (AD) to treat domestic waste. For the larger urban areas of Louth, AD Plants could be well used to deal with taking in waste in an efficient and environmentally friendly manner. Heat and electric power would be generated and a further by-product, the digestate, could be dealt with by Louth farmers in their agricultural operations. Such projects are already successfully being utilised elsewhere in the EU. This could be an opportunity for Louth County Council to innovatively break ground in Ireland and make great inroads to their emission cutting targets. Louth IFA can be of assistance in the development of a project such as this through the National IFA Environment Committee.

- **Further Louth IFA Proposals**

We are disappointed that Louth County Council seem to continue to neglect the agricultural and rural communities in Louth by not fully engaging with them on the likes of County Development Plan proposals and other issues that arise through the course of the year. As stakeholders, Louth IFA proposes that Louth County Council form an Agricultural Committee, as can be found in various other County Councils. Louth IFA would request seats on this committee. The formation of such a committee would hold benefits for not only the rural communities within the county, but for the County Council themselves as they would have a better scope of that within the county and how best to form and enact relevant policy.

In regard to the *N2 Ardee to Castleblaney Road Project*, we continue to ask that Louth County Council, Monaghan County Council and Jacobs Consulting Engineers are transparent and fair with affected landowners. As many of our members are affected, we request that Louth IFA continue to be made aware of developments in the process throughout. When it comes to engaging with landowners, we seek that full compensation is paid in regard to the loss incurred and that the Compulsory Purchase Order (CPO) Goodwill Payment is restored to €5,000 per acre and adhered to. Furthermore, any areas that have been deselected as chosen routes must have their status as sterilised land in terms of planning permission must be removed immediately.

Louth IFA appreciates the opportunity to make this submission regarding items which are of great importance to the sustainability and development of our farming and rural communities. We trust that you will consider our submission favourably. Should you wish for further information on any of our submission then please contact Turlough Slaney, Regional Executive for Louth IFA based in the Ballybay Office.