



21st December 2020

Forward Planning Unit
Development Plan Review
Louth County Council
Town Hall
Crowe Street
Dundalk
Co. Louth

Louth County Council

21 DEC 2020

Customer Services
Dundalk

Dear Sir or Madam

DEVELOPMENT PLAN REVIEW.

EHP Services has been appointed by Mr Andrew Connolly to make the following submission in respect of the draft Louth County Development Plan 2021-2027 and the proposed settlement boundary surrounding the village of Kilkerry, Co. Louth.

Please find enclosed a separate sheet of contact information in compliance with data protection legislation.

The Submitter owns lands within the village of Kilkerry along the L7128 comprising of the front field (3.392Ha approx.) outlined in red on Map 1 overleaf and rear field (2.76Ha approx.) outlined in blue.

The Submitter requests the village boundary be amended on the Kilkerry draft Zoning and Flood Zone Map 5.13 to include the front field and exclude specific plots of ground which have demonstrated a historic and persistent lack of developmental interest (see Map 2 overleaf).

We are cognisant that Kilkerry is identified in the draft County Plan's as a Level 5 Rural Village and the function it should play in the County's Settlement Hierarchy in strengthening the village fabric and creating sustainable rural communities. We note Table 2.14 of the draft County Plan projects the need for 871 additional new houses for Level 5 settlements and the wider rural area during its six year lifespan.

In keeping with the provisions of Policy Objectives CS 2 and CS 15 future growth around Kilkerry will be directed, as far as maybe practical, towards the village and

within the proposed settlement boundary. A cursory review of any sizeable plot of undeveloped ground within the settlement boundary indicated only three potential sites (see Map 3 overleaf). A review of the County Council's online planning website indicated no planning history whatsoever for Sites 1 & 2. Site 3 was subject to two applications in 1984 and 1987 to buildings to be used to store and sell car parts. These sites were included within Kilkerry's settlement boundary dating back as far as the 2009-2015 County Development Plan. We would suggest that the singular lack of interest in developing these sites renders them totally unsuitable and unreliable going forward yet again in the draft County Plan as the focus for any new development within the village. It is not unreasonable to suggest that growth within the village should be refocused and reliant upon other lands instead.

It is recommended Kilkerry's village boundary should be revised to exclude each plot of land in favour of the subject site which is owned by someone who has a track record of seeking to develop and provide future residents with suitable accommodation.

The subject site has planning history dating back to 1997. Permission was granted in October 1997 under planning ref. 9792 for the construction of 5no. dwellings. Outline permission was refused under ref. no. 98252 for a residential scheme of 25no. houses. Various circumstances including financial constrictions prevented the project going forward at that time. In September 2015 approval was granted under ref. 15410 for site development works for six plots, new road entrance and services. On foot of that consent outline permission was sought under ref. 15474 for 6no. detached dwellings, associated waste water treatment systems and site works. The decision to refuse was appealed but upheld by An Bord Pleanála (ref. PL 15.245868) because in the intervening period between submission and decision the current 2015-2021 County Development Plan came into force with a revised settlement boundary that had excluded the application/subject site.

It is submitted that within context of Policy Objectives CS 14, CS 15, CS 16 and SS 55 the request to amend the settlement boundary and include the subject site will better serve the interests of sustainable local growth and the continued vibrancy of the village by providing sites for the local population and those from the wider hinterland who may not qualify for rural one-off or local needs housing in accordance with draft Policy Objective CS 15.

As Kilkerry's village boundary has altered with each of the previous County Plan's the precedent has been set for a revised boundary as requested.

A revised settlement boundary would facilitate development that would promote consolidated growth in keeping with the principles of the draft County Plans Core Strategy which '*... facilitates and promotes a more consolidated compact urban form and ensures that future growth is based on the principles of sustainable development ...*' and draft Policy Objectives CS 14, CS 15, CS 16 and SS 55 which state:

- CS 14 *To ensure localised sustainable growth within the small towns and villages identified in the Settlement Strategy, is proportionate to the size of the settlement, prioritised on infill/brownfield sites and that economic related development is supported.*
- CS 15 *To strengthen and rejuvenate the fabric of rural villages and create sustainable rural communities to meet rural generated housing needs and alleviate the need for one off rural housing in the open countryside.*
- CS 16 *To direct rural generated housing demand to rural villages in the first instance and ensure that one off housing in the open countryside is only permitted where there is demonstrable compliance with the criteria for rural housing as provided for in the Development Plan.*
- SS 55 *To support the creation of vibrant rural communities by promoting and targeting sustainable growth in rural towns and managing the growth of rural areas under pressure for development.*

The subject site is ideally suited for a discrete development of approximately 6n. or less houses off a single vehicular entrance of a type, design and layout that would be in keeping with the prevailing pattern and grain of surrounding development. The provision of such a small number of new dwellings constructed either speculatively or individually would strengthen and rejuvenate the fabric of this rural village and contribute towards a more vibrant and sustainable rural community. The scope of potential development will not have any demonstrable or detrimental effect upon the draft County Plan's Housing Strategy or on the overall quantum of residentially zoned lands throughout the various settlement tiers.

In this regard we hope the County Council is favourably disposed to our submission and will make the necessary alterations to Map 5.13 as requested. If the Forward Plans Team has any queries regarding the above submission please do not hesitate to contact us.

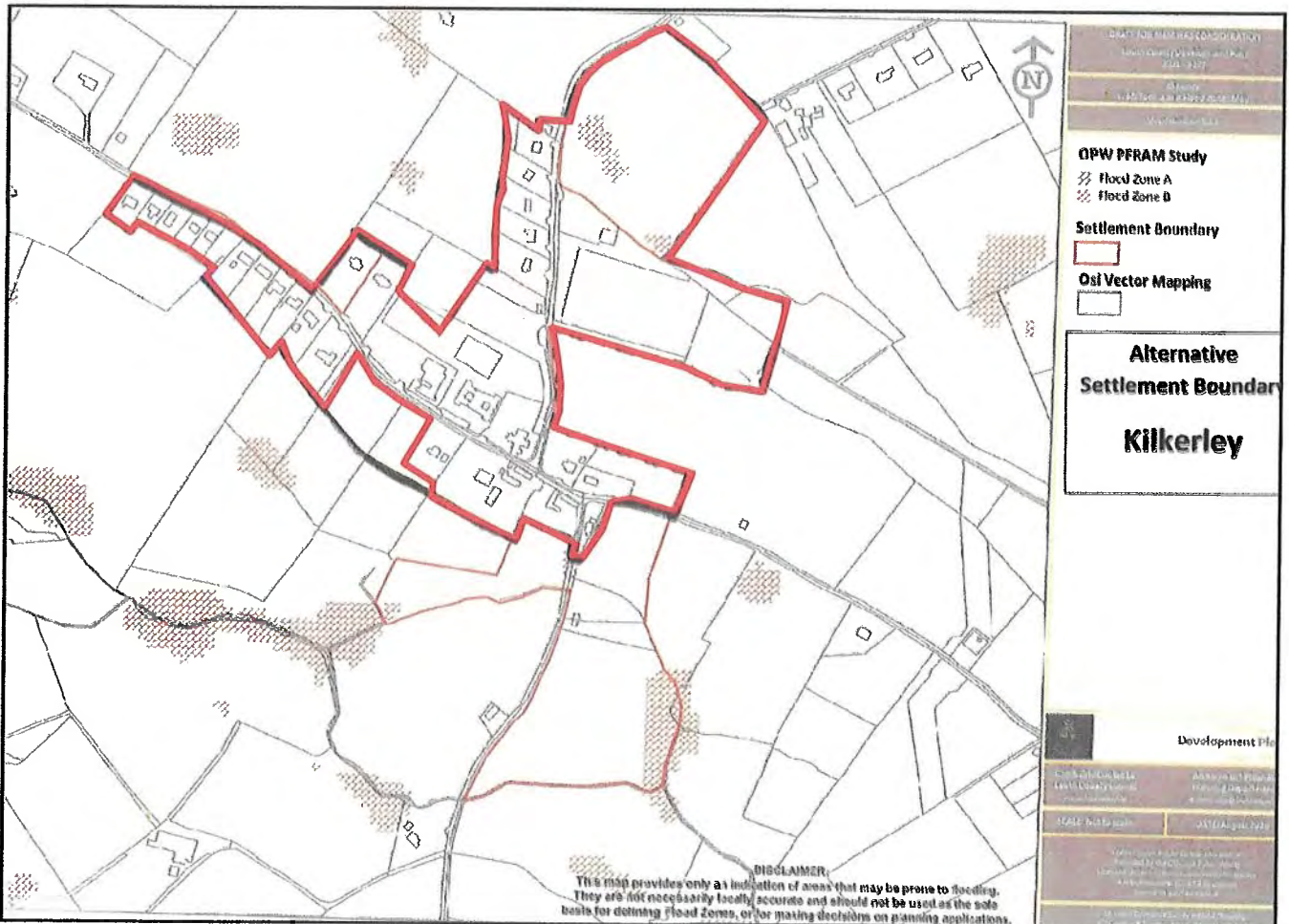
Regards

EHP Services



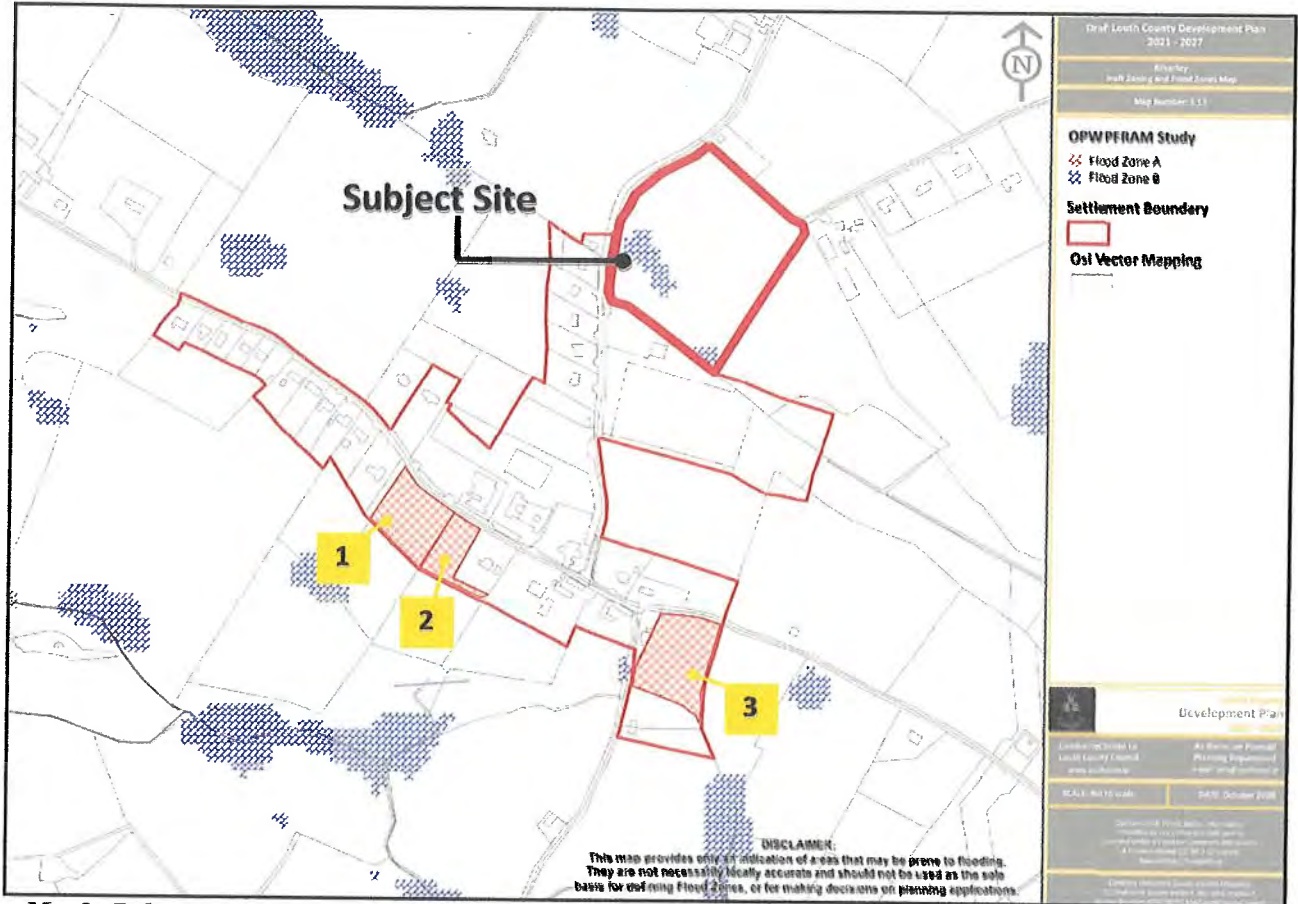
Map 1 - Site Location Map

Source: Google Maps 2020



Map 2 – Alternative Settlement Boundary

Source: draft Louth County Development Plan 2021-2027



Data Protection

Contact Information Sheet

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