



21st December 2020

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

Louth County Council
22 DEC 2020
Customer Services
Dundalk

Dear Sir or Madam

DEVELOPMENT PLAN REVIEW.

EHP Services has been appointed by Mr Donal Boyle to make the following submission in respect of the draft Louth County Development Plan 2021-2027 and to the settlement boundary proposed for Omeath.

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

Please find attached a detailed submission outlining the planning case for amending the village boundary around Omeath as illustrated in the draft Omeath Zoning and Flood Zones Map 4.7.

In this regard we hope the County Council is favourably disposed to our submission and will make the necessary alterations to Map 4.7 as requested.

If the Forward Plans Team has any queries regarding the above submission please do not hesitate to contact us.

Regards

EHP Services

Environmental **H**eritage **P**lanning

Louth County Development Plan Review

Cul na Rath, Knocknagoran
Omeath

Draft County Plan Submission



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- contents -

1.0	INTRODUCTION	4
2.0	THE SUBJECT SITE	4
3.0	PLANNING HISTORY	5
4.0	PLANNING POLICY CONTEXT	5
5.0	JUSTIFICATION FOR REVISION & REZONING	8

1.0 INTRODUCTION.

- 1.1 EHP Services has been appointed by Mr Donal Boyle to make the following submission to Louth County Council's Forward Plans Team in respect of the draft Louth County Development Plan 2021-2027.
- 1.2 The Submitter requests the draft Omeath Zoning and Flood Zones Map 4.7 be revised to extend the settlement boundary around the subject site identified in Figures 1 & 2 overleaf and designate it as A2 – New Residential.
- 1.3 The subject site forms part of the original approved estate layout and is a brownfield site. The Submitter is anxious to complete out the estate but is prevented from doing so under the zoning and policy provisions within the current and now draft County Development Plans. The following statement will demonstrate how limited residential development of the subject site and the final phase of the estate is compatible with relevant national, regional and local planning frameworks and will facilitate a sustainable pattern of growth and development within Omeath.

2.0 THE SUBJECT SITE.

- 2.1 The 1.61 acre subject site is located to the rear (south-west) of the Cul na Rath residential scheme in Knocknagoran, Omeath, Co. Louth (see Figures 1 & 2 below and overleaf) comprising of an unfinished section of estate road, partially completed footpath and overgrown interior. The site slopes upwards in a south-westerly direction. Infrastructural services extend underneath the road and footpath into the subject site. The site was recently cleared of ground vegetation and a substantial volume of rubble and spoil which had been dumped during construction of earlier phases of constructing the estate.



Figure 1: Site Location Map

Source: Google Maps (2020)



Figure 2: Site Location Map

NOT TO SCALE

3.0 PLANNING HISTORY.

3.1 The residential estate within which the subject site is located has been developed incrementally over many years under various grants of planning permission summarised in the following table:

Ref. No.	Description	Decision
96798	Outline permission for 17no. dwellings (8no. semi-detached & 9no. detached).	Approved 24.10.97
991498	Approval Permission for 17no. dwellings.	Unknown
00493	Construction 23no. dwellings.	Approved 13.08.00
011420	Retention of velux rooflights to rear of existing dwellings.	Approved 04.03.02
04770	Change of house design to units 10-23 previously approved ref. 00/493.	Approved 27.09.04

4.0 PLANNING POLICY CONTEXT.

4.1 The following section sets out how the proposed revision to Omeath's settlement boundary will facilitate development which is consistent with the proper planning and sustainable development of the village and encouraged throughout national, regional and local tiers of planning guidance and policy objective.

Project Ireland 2040: National Planning Framework.

- 4.2 In developing a new region focused strategy for managed growth the National Planning Framework (NPF) acknowledges half of such growth will be focused on Ireland's large and smaller towns, villages and rural areas. The NPF's new strategy for managing growth includes a major new policy emphasises on renewing and developing existing settlements rather than '*... continual expansion and sprawl of cities and towns out into the countryside at the expense of town centres and smaller villages*'. The target is for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites.
- 4.3 One of the NPF's National Strategic Objectives is consolidated growth as a means of managing the sustainable growth of compact towns and villages as a means of adding value and creating more attractive places for people to live and work and building resilience into rural settlements as a means of reversing rural town/village and population decline.
- 4.4 The NPF sets out core principles for the delivery of resilient and diverse future housing including allowing '*... for a choice in housing location, type, tenure and accommodation in responding to need*'. It outlines a number of national policy objectives (NPO) aimed at providing an output of '*...at least 25,000 new homes...*' between 2018 and 2040 per year to meet people's needs for '*...well-located and affordable housing, with increasing demand to cater for one and two-person households*' including:
- NPO 3a – *Deliver at least 40% of all new homes nationally within the built up footprints of existing settlements.*
- NPO 3c – *Deliver at least 30% of all new homes in settlements other than the five Cities (Dublin, Cork, Limerick, Galway and Waterford) and their suburbs, within their existing built-up footprints.*
- NPO 33 - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*
- 4.5 Section 4.5 of the NPF states a significant proportion of future urban development is targeted on infill/brownfield development sites within '*... the built footprint of existing urban areas ...*' which is applicable to all scales of settlement, from the largest city to the smallest village. It acknowledges that infill and brownfield development is more challenging to deliver for a variety of reasons but is highly recommended over the development of greenfield site. The NPF advocates for

compact or contained growth of urban settlements by '*... targeting infill lands, some of which will be brownfield sites, in existing built-up areas...*'.

Regional Spatial & Economic Strategy.

4.6 The Regional Spatial and Economic Strategy (RSES) seeks to determine at a regional scale how best to achieve the shared goals set out in the National Strategic Outcomes (NSOs) of the NPF. The RSES recognises that lower tier towns and villages should '*... provide for commensurate population and employment growth, providing for natural increase and to become more economically self-sustaining, in line with the quality and capacity of public transport, services and infrastructure available*'.

4.7 One of the Regional Strategic Outcomes of the RSES is compact growth and urban regeneration. RSO 2 states:

Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. (NSO 1)

4.8 Facilitating housing is paramount to ensuring the sustainability, vitality and viability of the rural places of the Region. Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth. To that end Regional Policy Objectives (RPOs) 4.78 and 4.83 state:

RPO 4.78: Development plans should support the development of a 'New Homes in Small Towns and Villages' initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.

RPO 4.83: Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.

Guidelines to Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

4.9 The Guidelines and companion *Urban Design Manual: Best Practice Guide (2009)* introduced core principles of urban design and sustainability into neighbourhood creation and urban based housing development proposals. The Guidelines

recognises smaller towns and villages are an important part of Ireland’s identity and the distinctiveness and economy of its regions. Many villages, particularly those within easy commuting range of principal cities and towns have experienced a wave of development in recent years, particularly residential developments. In many cases such development has brought positive benefits in the form of extra housing supply and enhancement of the viability of local shops and public services. However, in some cases, there is concern about the impact of rapid development and expansion on the character of smaller towns and villages through poor design approaches.

Louth Housing Strategy 2021-2027

4.10 The purpose of the Housing Strategy is to ensure that the proper planning and sustainable development of the County provides for the housing of the existing and future population of the area in the sustainable and achievable manner. Table 3.1 outlined population growth between 2011 and 2016 as a guide to estimating the potential future growth of towns and villages within the County. In relation to Omeath the settlement increased by 100no. persons or 19.9% as described in the following table.

	Population 2011	Population 2016	Growth Rate (2011-2016)	Growth Rate % (2011-2016)
Omeath	503	603	100 persons	19.9%

Louth County Development Plan 2015-2021.

4.11 Omeath is identified in the County Plan as a Level 3 rural settlement. It is an objective of the County Pan to ensure development within such villages is commensurate with the settlement’s scale, nature and extent. Policy SS 9 sets out the need to ensure new development supports the settlement’s identified role within the County settlement hierarchy and states:

SS 9: *To promote and facilitate limited development within Level 3 Settlements that is commensurate with the nature and extent of the existing settlement, to support their role as local service centres and to implement the policies and objectives relative to each settlement as provided for in Appendix 2, Volume 2 (a).*

5.0 JUSTIFICATION FOR REVISION & REZONING.

5.1 The draft County Plan recognises Omeath as a Level 4 Small Town/Village where future growth will ‘... focus on localised sustainable growth meeting the needs of the local population’. Table 2.14 of the draft County Plan provided a breakdown of projected

population growth within the Plan's six year lifespan and the distribution of allocated new housing for each tier of settlement. For all Level 4 settlements, including Omeath, the draft County Plan projected a future population of 3.7% and the requirement for an additional 436no. units to be completed between 2016-2027.

- 5.2 Omeath's growth of 19.9% between 2011 and 2016 as noted in the Louth Housing Strategy 2021-2027 far exceeded national and county population growth rates for the same period¹. It is not unreasonable to assume that this rate of growth will continue throughout the lifespan of the draft County Plan increasing the village's population to 720no. persons or an additional 117no. people². Applying an average occupancy rate of 2.76no. persons per dwelling³ the potential increase in the local population of 117no. persons would require an additional 42.39no. new dwellings⁴.
- 5.3 The draft County Plan does not indicate the quantum of land zoned within Omeath's settlement boundary as A2 - New Residential however we submit that the subject site is physically and contextually an ideal location to provide some of the new housing requirement over the next six years.
- 5.4 The proposed realignment of the village boundary and rezoning as A2 - New Residential (see Figure 3 overleaf) would facilitate the Submitter's plan to see the final phase of the Cul na Rath estate developed. The site meets the definition of brownfield as set out in the Section 5.7 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). The site comprises of the partially completed access road and footpath that runs passed No. 16 Cul na Rath and the underground infrastructural services (water, sewerage, power etc.) that continue on for several metres. The site was also subject to engineering works in the form of removing ground cover vegetation and the removal of a substantial volume of underlying rubble which had been deposited on site during the construction of earlier phases of Cul na Rath.

¹ 2016 Census data, Central Statistics Office, Dublin

² 603no. persons x 19.9% = 719.997 (720no.) persons

³ Table 2.11 Average Occupancy Rate 2016 draft Louth County Development Plan 2021-2027

⁴ 117no. persons ÷ 2.76 (avg. occupancy rate) = 42.39no. new dwellings.



Figure 3: Alternative Settlement Boundary & Zoning Map

Source: draft Louth County Development Plan 2021-2027

- 5.5 Utilisation of brownfield sites within any level of settlement is an entirely more desirable and sustainable form of development than rural one-off housing or the use of greenfield land within a town or village boundary and is consistently encouraged throughout all levels of planning policy frameworks and guidance. For example Section 4.5 of the National Planning Framework (NPF) encouraging 40% of new housing to be built within an infill and brownfield lands within existing built up areas.
- 5.6 The proposed boundary alteration and rezoning would also facilitate the completion of an unfinished estate which is also a high priority for national, regional and local planning policy objectives.
- 5.7 A revised settlement boundary would facilitate development that would promote consolidated growth and strengthen the existing urban fabric 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.

5.8 We envisage the subject site providing an additional 9no. dwellings of a design and layout comparable to Cul na Rath's prevailing vernacular and grain of development (see Figure 4 below). It would be of a scale commensurate with and complementary to the surrounding urban form. The development of this brownfield site would strengthen and rejuvenate the fabric of the village and contribute towards a more vibrant and sustainable rural community. In addition to serving the future housing needs of the settlement, as discussed above, we envisage this small contribution to the County's overall housing provision also delivering upon Policy CS 15 through the provision of housing for those who do not qualify for rural one-off housing but still wish to live rurally. The proposed amendments and the subsequent provision of an additional nine new residential units will not materially or detrimentally effect of the balance set out in the draft County Plan's Housing Strategy or impact upon the overall quantum of land zoned residential development throughout the County.

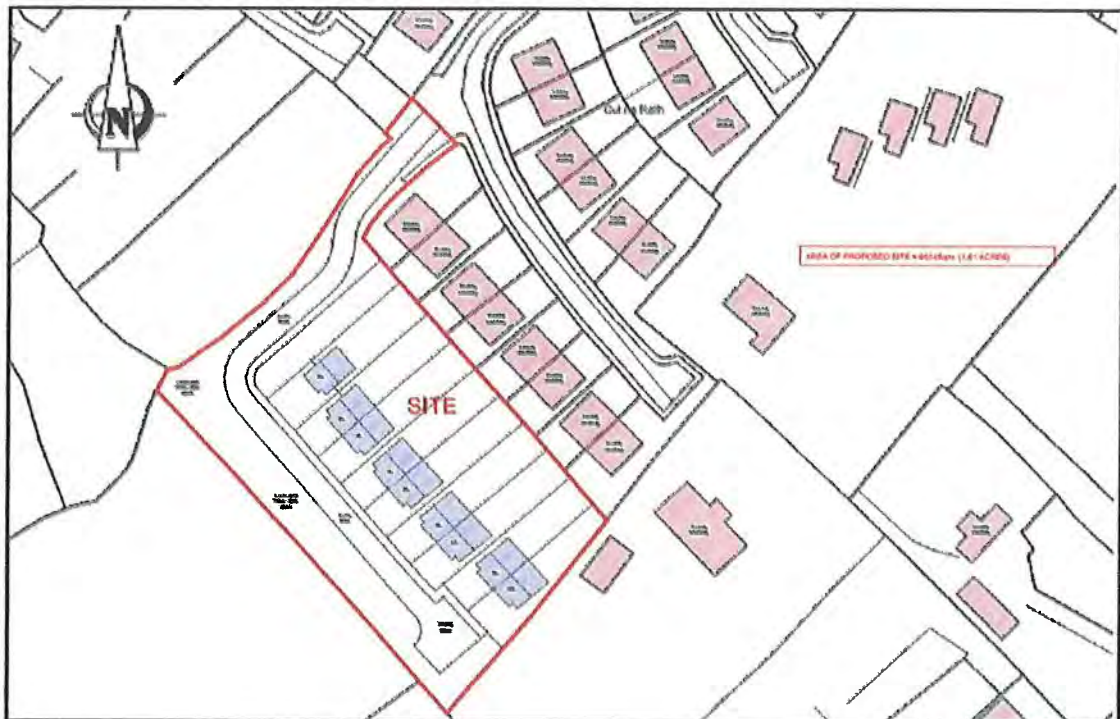


Figure 4 – Indicative Site Layout

NOT TO SCALE

- 5.9 In this regard we hope the County Council is favourably disposed to our submission and will make the necessary alterations to Map 4.7 as requested.
- 5.10 If the Forward Plans Team has any queries regarding this submission please do not hesitate to contact us.