

Forward Planning Section
Louth County Council
Town Hall
Crowe Street
Dundalk
Co. Louth

22/12/20

Re: Draft Louth County Development Plan 2021-2027

Dear Sir, Madam

P. Herr & Associates wish to make the following submissions in relation to the Draft County Louth Development Plan 2021-2027 on behalf of Mr Owen V Woods, :

The submission relates to a 0.15Ha plot of lands at River Lane, Carlingford which is owned by Mr Woods

1.0 PROPOSED ZONING

- 1.1 The lands are shown to be included within Settlement Centre of Carlingford and are zoned as Existing Residential on the Carlingford Draft Zoning and Flood Zones Map (Map No.3.1) as shown on Fig.1

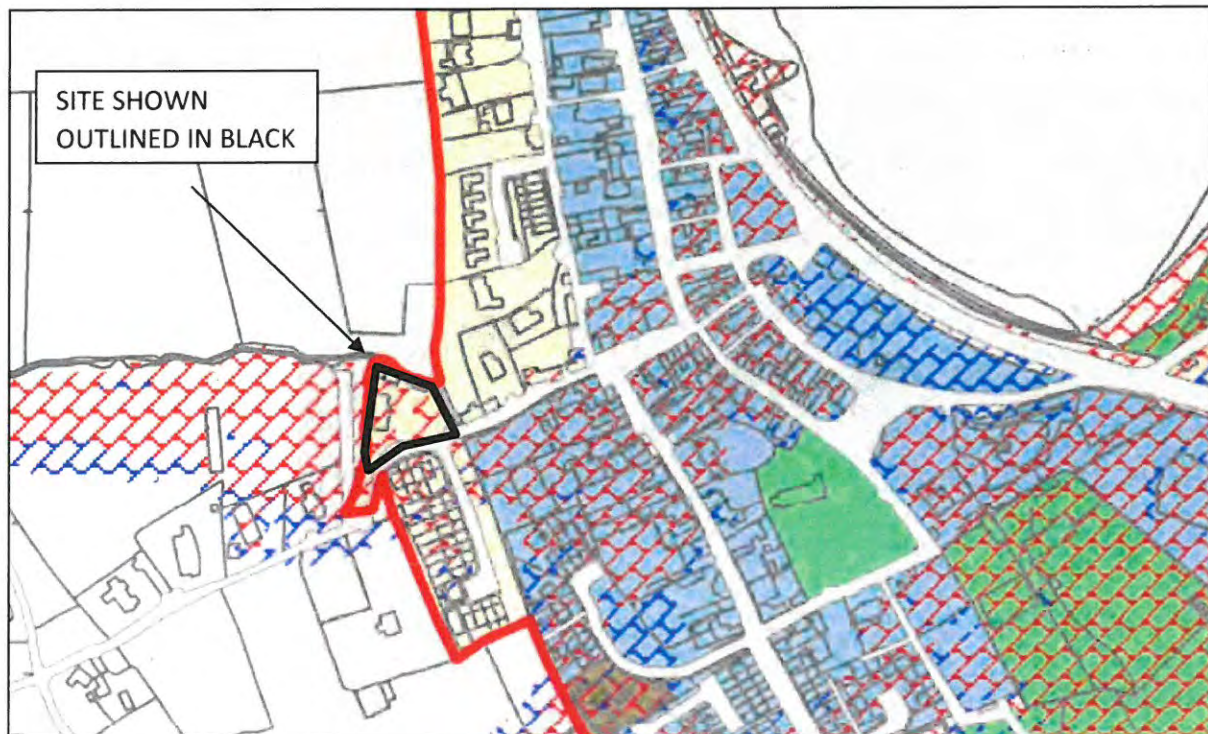


Fig. 1 – Extract from Carlingford Draft Zoning and Flood Zones Map with Site Marked Thereon

2.0 APPLICANTS SUBMISSION

2.1 Mr Woods seeks to have these lands excluded from the Carlingford Settlement Centre

3.0 CASE IN SUPPORT OF THE SUBMISSION

3.1 The lands are occupied by Mr Wood's family home and comprise of a single storey bungalow located on the higher grounds to the rear and a mature landscaped garden to the front.

3.2 The site offers spectacular views of Carlingford Lough and the Mourne Mountains. Mr Woods has spent the last 30 years crafting the site and garden and has absolutely no interest in allowing any further development on the lands

3.3 It is further noted that the lands are designated as being located within a Flood Zone A. Such a designation shall hamper and likely preclude the provision of any residential type development on the lands.

3.4 The zoning does not reflect either the intentions of the landowner nor the designation of the lands as a Flood Zone

3.5 The zoning of the lands as proposed shall, given the circumstances outline above, be ineffective in 'supporting and encouraging residential development within the settlement area'.

3.6 The zoning would also appear to contradict Policy CAR 18 of the Draft Plan which seeks to avoid 'highly vulnerable developments' on lands at risk of flooding as follows:

Policy Objective	
CAR 18	To avoid land uses or development identified as 'highly vulnerable development' in Table 3.1 of <i>'The Planning System and Flood Risk Management Guidelines (2009)'</i> on lands at risk of flooding and where development in floodplains cannot be avoided, take a sequential approach to flood risk management based on avoidance, reduction and adaptation to the risk.

3.7 The inclusion of the site within the defined Settlement Centre of Carlingford and the zoning of the lands as 'Existing Residential' therefore represents a wasteful allocation of an important land-use zoning.

3.8 The north west boundary of the Carlingford Settlement Centre runs along the Old Town Wall except in the vicinity of River Lane where it protrudes out to the west of the old town wall. This protrusion includes both the subject site and the the Cul na Bala residential development on the south side of River Lane.

3.9 The subject site is located to the west of the old town wall and there is no reason, given its location , size, current land-use and wishes of the landowner to include it within the settlement centre

- 3.10 The protrusion appears to have been created with the primary intention to have the Cul na Bala included within the defined settlement area and the inclusion of the subject lands within the Settlement Area can be deemed something of an anomaly.
- 3.10 Mr Woods is also fearful that he may be financially penalised under possible future legislation for allowing zoned lands to remain undeveloped
- 3.11 Overall, it is considered preferable that the Planning Authority recognise that persisting with the proposed zoning of the lands would be wasteful and that they address the issue at this stage by removing the lands from the settlement centre as requested by Mr Woods
- 3.12 This decision would then allow the land-zone allocation to more transferred onto alternative lands within the settlement that are better suited to 'supporting and encouraging residential development within the settlement area'.
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