

Draft Louth County Development Plan 2021-2027

Lorraine Mc Cann []

Sent: 22 December 2020 15:26

To: LouthCDP

Attachments: Draft Development Plan su~1.docx (20 KB)

Hello,

Please see below and attached my submission in response to the Draft Louth County Development Plan 2021-2027.

A response is expected from Louth County Council.

Many thanks,
Lorraine McCann

To whom it may concern,

I am writing this submission to the Council to **strongly object to the “Qualifying Criteria Rural Policy Zone 1”** as set out in the *Draft Louth County Development Plan 2021 – 2027 (“the Draft Development Plan”)*. I am a resident of Glenmore in the Cooley Peninsula, a Zone 1 resident, and my objection is in relation to this area in particular on the grounds of the following reasons and observations of the Draft Development Plan:

- Rationale for “*qualifying landowners*” has not been provided. This must be provided to allow local residents to understand the basis of research that has been undertaken on how the “*qualifying landowners*” criteria has been determined, taking into account all aspects relating to potential impacts on the economy, society and environmental aspects in particular if future development is limited to “*qualifying landowners*”. The requirement to own a landholding of at least three hectares is extremely limiting and favours those from agricultural families, and prohibits those who are from non-farming families, to build in their local community. This will decimate the cultural, economic and societal value of this area in years to come as the majority of current residents who do not yet own their own home will be forced to move out of the community.
- The Plan notes additional protections due to the *landscape and cultural value* of Zone 1; however, the proposed qualifying criteria for Zone 1 supports, and significantly promotes, agriculture in an area of outstanding natural beauty and a Special Area of Conservation (SAC). Agricultural land is of low ecological value and does not protect the landscape or biodiversity in the area. Further promotion of agriculture in this region could negatively impact water quality, cause soil erosion due to overgrazing, loss of habitat and biodiversity, and lead to additional greenhouse gas emissions. I will also note the 2015-2021 Louth County Council Development Plan stipulates that “*to preserve and protect the natural unspoilt physical landscapes Zone 1 relates principally to the high mountainous areas of Cooley... this unspoilt landscape must be protected from harmful development*”. The intentions of the current Draft Development Plan completely contradict those set out in the previous Development Plan.
- Chapter 12 of the Draft Development Plan outlines that it seeks “*to promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes across the settlement areas and communities of County Louth helping to successfully contribute and deliver on the obligations of the State to transition to low carbon and climate resilient society*”. Emissions from agriculture currently represent 33% of Ireland’s greenhouse gas emissions, and in the most

recent Climate Action Plan and Climate Action Bill, we have a target to reach net zero emissions by 2050. The *“Qualifying Criteria Rural Policy Zone 1”* which promotes more agriculture, directly contradicts this legislation and the plans for our country to transition to a low-carbon economy.

- The Draft Development Plan notes the landholdings of *“qualifying landowners”* must be at least three hectares, however there is no requirement for additional dwellings to be built within that same landholding, making it unclear as to what the purpose of this requirement is. This requirement will allow those more fortunate from agricultural families to build anywhere in Zone 1, rather than on their own land, which is in contradiction to the intention of the rural development policy. Therefore, it is unclear why landowners with smaller landholdings in Zone 1 are disqualified from building in Zone 1 - if those who are apparently eligible under the criteria (on the basis of being from an agricultural family with three hectares) can build anywhere in Zone 1.
- In the 2015-2021 Louth County Council Development Plan it states that *“The Council has always recognised and accepted the importance of rural housing in meeting local housing needs and in sustaining rural services such as primary schools, post offices and village shops. The Council also accepts what it considers as the legitimate aspirations of people who are born and raised in the countryside wishing to reside within their own community”*. It appears that this recognition by the Council no longer applies which is disappointing, as the current Draft Development Plan and the *“Qualifying Criteria Rural Policy Zone 1”* will lead to a significant decline in meeting local housing needs and rural services for those such as myself, and the majority of this community, who are from non-farming families (and who don't own three hectares of land) and therefore are not eligible to build in Zone 1. It is extremely important for the culture and heritage of this area that we have diversified economic activities, which includes those that extend beyond agriculture. It is imperative that the qualifying criteria are re-drafted.
- The Draft Development Plan sets out that it *“recognises the importance of facilitating people with a strong economic or social link to their local rural area – and that the ‘local rural area’ is defined as being a radius of 6 kilometres from the qualifying family residence”*. The criteria set out for Zone 1 does not align with this intention. The criteria as it is currently written is regressive and will in fact push those that have a strong economic and social link to their rural area, out of the community as they will be unable to build within it.
- Furthermore, the criteria for Zone 1 states that *“Any applicant under this category must demonstrate a rural housing need and shall not have previously owned a dwelling”*. In the current economic crisis, as a part-homeowner in another county who does not have full ownership of a property on the basis that property costs are at an all-time high, at some point in the future when I can afford it, it is an objective to be able to build my own home in my rural area in Zone 1. Once again, this criterion is extremely regressive and does not take into account the current housing crisis we are experiencing in Ireland and the associated challenges with home ownership.
- On a personal level, I am a native resident of Zone 1 for over 32 years, and my family (the landowners) are not engaged in full-time agriculture nor do we own at least three hectares of land. Under the current Draft Development Plan, I will not meet the criteria to build a home in my native area despite the fact that I have invested significantly in the economic, social and cultural development of this region. I went to school in the area, and I was an active member of local GAA and athletics clubs which make up the very essence of this community. I also continue to support local community charity activities. To learn now that I will be unable to build my own house in this region simply because my family do not engage in agriculture activities nor have land, is social discrimination.
- It is economically and socially unjust and unfair to prioritise agricultural families in the region. It is extremely important for the culture and heritage of this area that we have diversified economic activities, which includes those that extend beyond agriculture. To set criteria that are routed around land ownership, is extremely short-sighted and completely detached from the economic circumstances that we have observed over the past decade. The average cost of an acre in Zone 1

would be €60,000 - €70,000 which has historically continued to increase. When you also take into account the fact that the working demographic today has experienced continuous tax increases (employment, fuel, motor, property), and the significant costs of housing through rent etc., it would be extremely difficult for any non-agricultural family in this region to purchase three hectares of land given the economic challenges outlined herein. Furthermore, a reduced capacity for agricultural families to use their land for the purposes of residential use, beyond two dwellings for their own children, will undoubtedly devalue the land in the community and therefore lead to further negative economic impacts for this area.

In order for this region to thrive we must diversify both socially and economically, and to limit the future residential, and therefore economic activities in this region, to agriculture will be hugely impactful on both the culture and environment of this community. Current native residents who do not meet the criteria will have to build in Zone 2 regions or elsewhere thus moving out the community that we have invested in our whole lives, leading to potential future negative impacts from a social, cultural and economic perspective.

Solution

The criteria for Zone 1 should be revised to align with criteria #3 set out for Zone 2 which specifies the following:

“Landowners including their sons and daughters who are native residents of the area. A native resident is someone who has resided in the rural area of Louth for at least 18 years prior to any application for planning permission. Any applicant under this category must demonstrate a rural housing need and shall not own or have sold a residential property in the County for a minimum of 10 years prior to making an application.”

See next page for names and address

Regards,

Lorraine McCann, Emily McCann, Maria McGrath