



22nd December 2020

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

Louth County Council

23 DEC 2020

Customer Services
Dundalk

Dear Sir or Madam

DEVELOPMENT PLAN REVIEW.

EHP Services has been appointed by Mr Jim Kirwan to make the following submission in respect of the draft Louth County Development Plan 2021-2027.

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

Further to our initial Strategic Issues Paper submission (ref. no.. DPR 98) please find attached a detailed submission outlining the planning case for amending the settlement boundary around the village Sandpit, Co. Louth as illustrated in the draft Sandpit Zoning and Flood Zones Map 5.20.

In this regard we hope the County Council is favourably disposed to our submission and will make the necessary alterations to Map 5.20 as requested.

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

Louth County Development Plan Review

Sandpit, Co. Louth

Draft County Plan Submission



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1.0 INTRODUCTION.

- 1.1 EHP Services has been appointed by Mr Jim Kirwan 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 Sandpit Zoning and Flood Zones Map 5.20 be revised to promote a more consolidated and concentric pattern of growth to the village than has been historically permitted.
- 1.3 The subject site is located on the northern side of Miltown Lane, Sandpit (see Figure 1 below) and comprises of a large pastural field framed by detached dwellings either side of a wide agricultural entrance. Milltown Lodge, a development of 13no. dwellings backs onto Miltown Lane opposite the subject site.
- 1.4 The following statement will demonstrate that the extent and configuration of the proposed settlement boundary for Sandpit will promote the continued disjointed and lopsided pattern of development and urban form that is contrary to good planning practice and guidance. The statement will also highlight the untenable nature of relying on certain blocks of land within the settlement boundary for future housing and how facilitating development within the subject site, though the requested revision of the settlement boundary, is compliant with relevant national, regional and local planning frameworks and the proper planning and sustainable development of the village.



Figure 1: Site Location Map

Source: Google Maps 2020

2.0 SANDPIT'S URBAN FORM.

- 2.1 Sandpit's urban form has been heavily influenced by its north-south axis along the L2278 and the westerly offshoot leading to Miltown (see Figure 2 below).
- 2.2 Historic Ordnance Survey maps indicate the village initially centred on St. Mary's Church (Church of the Assumption) and several cottages but was generally sparsely developed and mostly open countryside.

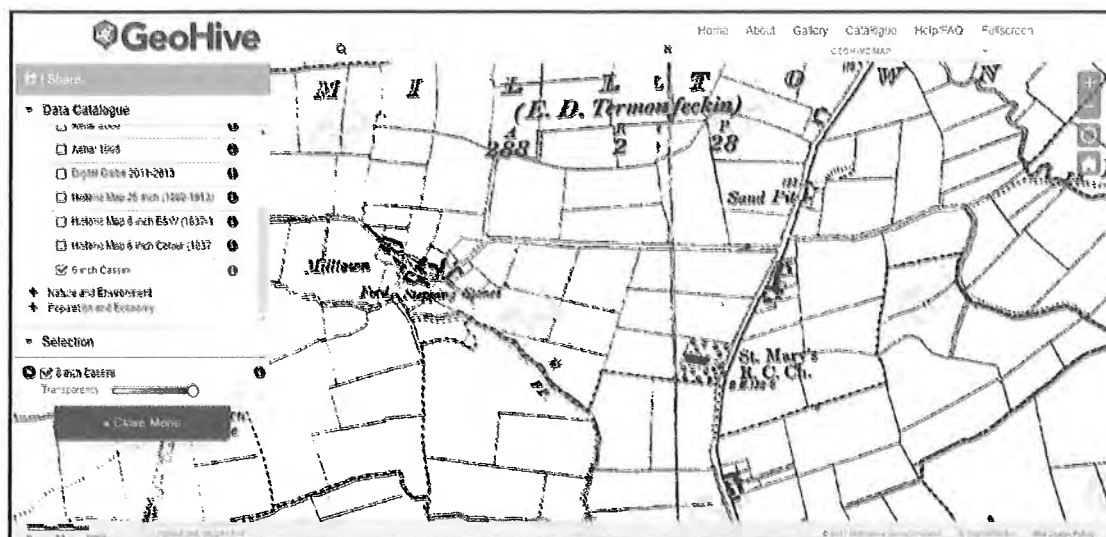


Figure 2: Historic Ordnance Survey Map

Source: www.geohive.ie 2020

- 2.3 In the intervening years dwellings, businesses and the National School (opened in 1956) coalesced into what a discernible village core i.e. the church, school, McGrane's Foodstore and Brian Campbell's Fitted Furniture Ltd. and expanded north, south and westwards along the local road network into archetypal ribbon development. This pattern of development and piecemeal residential development has effectively amalgamated Sandpit with Miltown and the surrounding hinterland particularly to the south with the development of the Woodbrook residential scheme and adjoining dwellings.
- 2.4 The village's unchecked sprawl beyond the into the and incremental expansion of the village as illustrated in Figure 3 overleaf has been a persistent concern to the Submitter who has made repeated submissions in the previous three County Development Plan reviews with a view to providing a necessary counter-balance to unconstrained expansion.

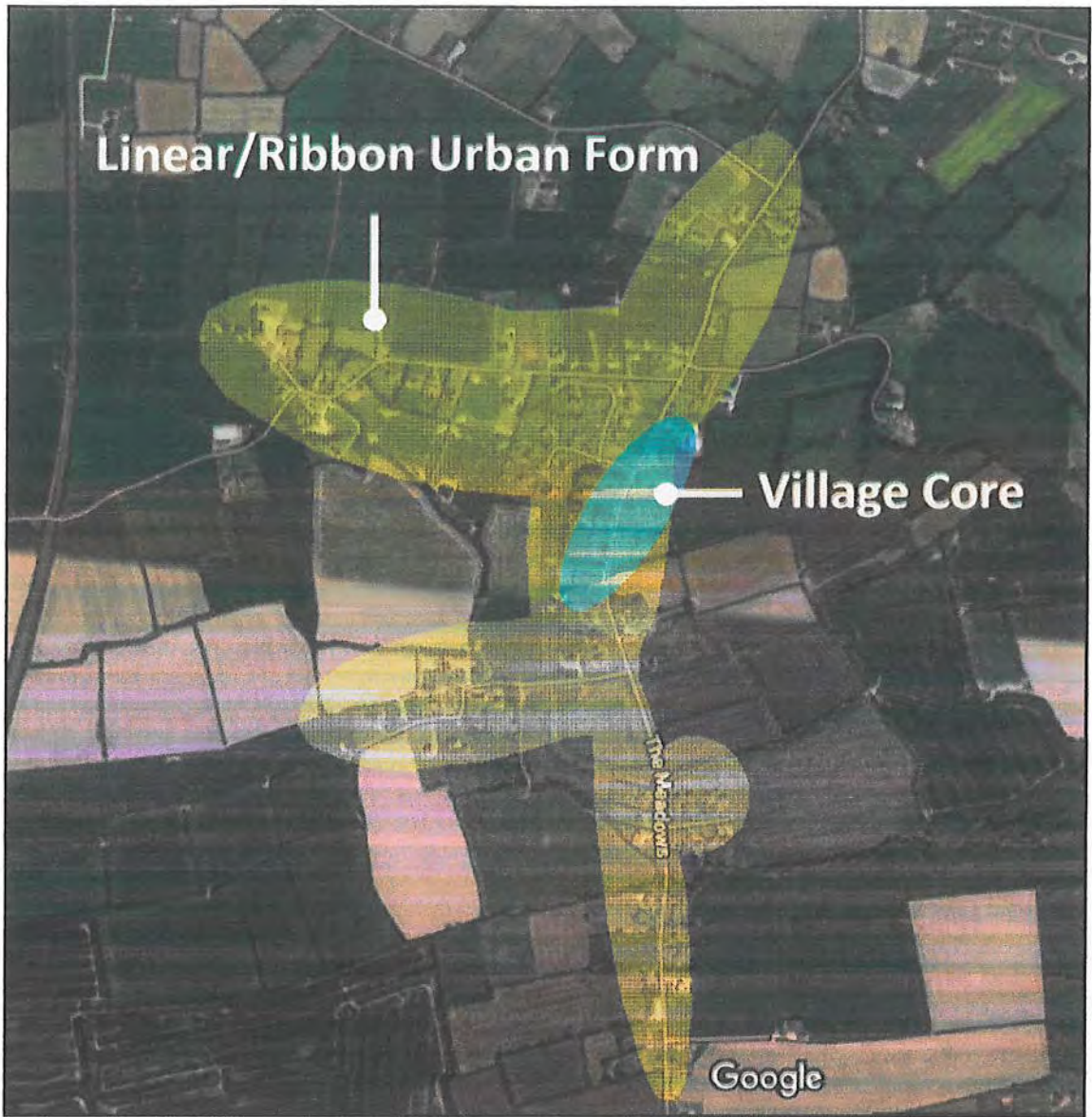


Figure 3: Linear/Ribbon Urban Form

Source: Google Maps 2020

3.0 PLANNING POLICY CONTEXT.

- 3.1 The following section sets out how the proposed revision to Sandpits settlement boundary to include the subject site and delete other specified sites 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.

- 3.2 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.
- 3.3 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.
- 3.4 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.*

- 3.5 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. 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.

- 3.6 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*'.

- 3.7 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)

- 3.8 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).

- 3.9 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 County Development Plan 2015-2021.

- 3.10 Sandpit is identified in the current County Plan as a Level 4 village. 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 10 sets out the need to ensure new development supports the settlement's identified role within the County settlement hierarchy and states:

SS 10 To provide for the construction of one-off type houses within Level 4 Rural Settlements in order to assist in satisfying a housing and county based local area need within a structured but low density environment as an alternative to the development of scattered one – off housing.

4.0 JUSTIFICATION FOR REVISED SETTLEMENT BOUNDARY.

- 4.1 The draft County Plan classifies Sandpit as a Level 5 Rural Village. 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 5 settlements and the remaining rural area of the County the draft County Plan projected a future requirement of 871no. dwellings.
- 4.2 The proposed realignment of the village boundary (see Figure 4 below) would facilitate the Submitter's plan to see the subject site developed and redress the urban sprawl southwards with development that concentrates new homes closer to the village core.

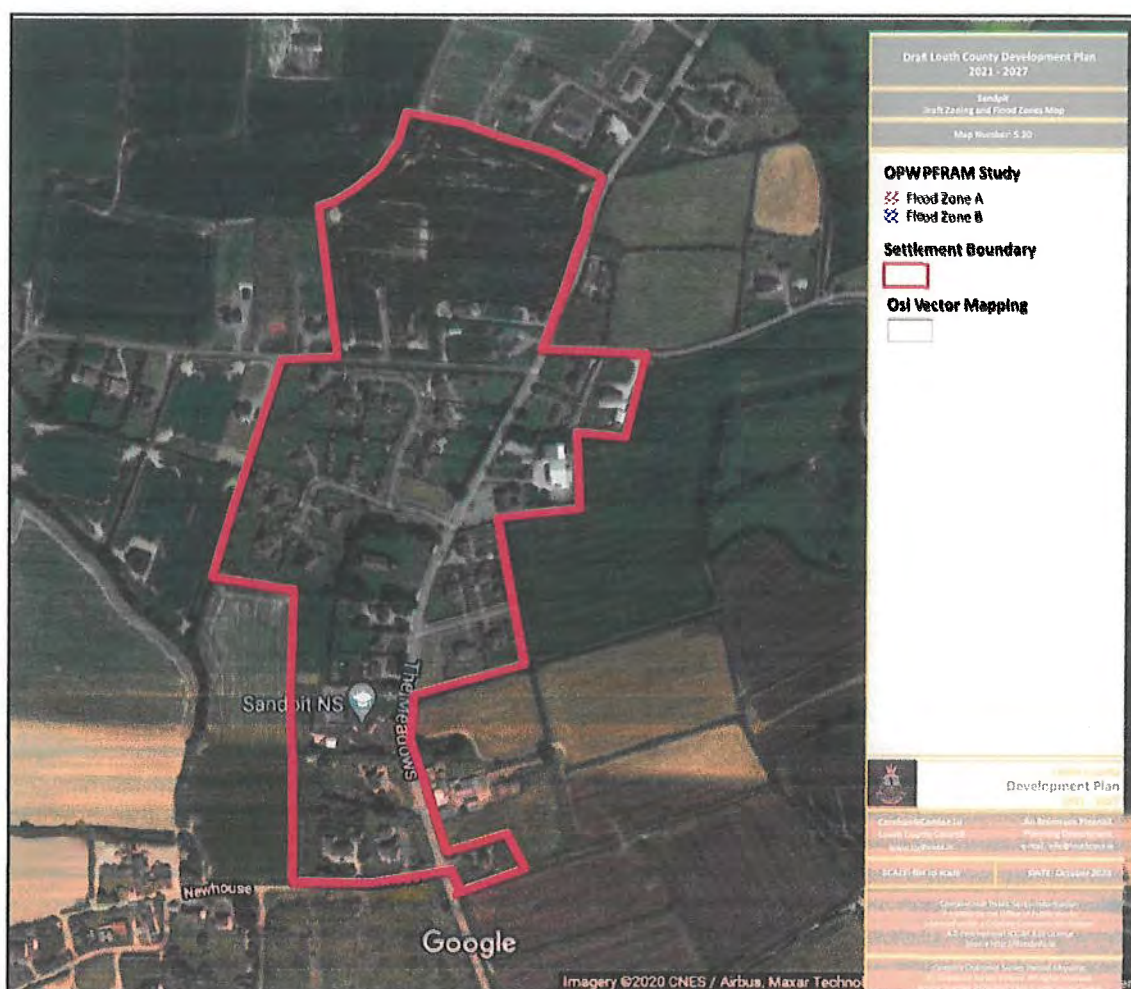


Figure 4: Alternative Settlement Boundary Source: draft Louth County Development Plan 2021-2027

- 4.3 Map 5.20 as presented in the draft County Plan essentially replicates the same settlement boundary outlined in the current Louth County Development Plan including blocks of land to the south and east of the village core that have historically remained undeveloped or shown no interest in applying for planning permission (see Figure 5 overleaf). It is submitted that despite the zoning and

planning benefits of the current and previous County Plans the failure to deliver any new housing to serve the local community effectively disenfranchises them as the source/location of future housing provision. In other words it is time for alternative sites to be considered and for more engaged landowners/developers to meet the objective set out in Policy SS 54 which states:

SS 54 To support and facilitate balanced and proportionate population and economic growth in the Self-Sustaining Growth Towns, Small Towns and villages, and Rural Villages that will meet the needs of the residents of the settlements identified each of the settlement categories.

- 4.4 A review of the County Council's online planning system provided a history of permissions granted on each of the undeveloped sites identified in Figure 5 below and which are summarised in the following table.

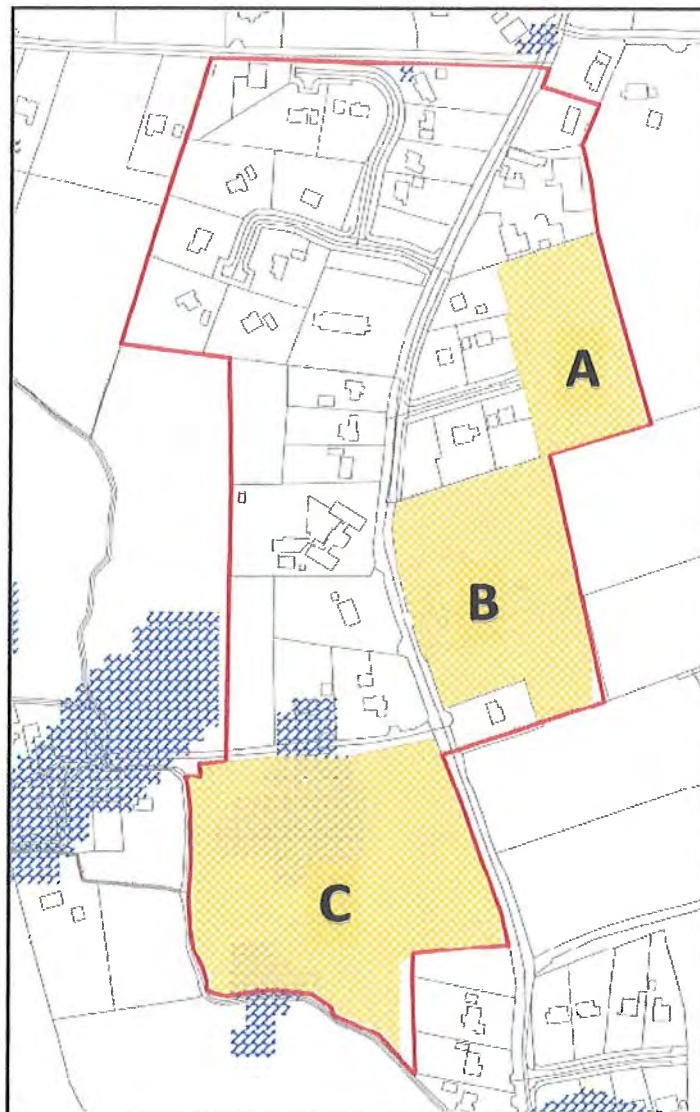


Figure 5: Site Planning History

Source: www.louthcoco.ie (2020)

Site	Area (approx.)	Planning ref. no.	Description	Decision
A	2.32 acres	n/a	n/a	n/a
B	4.37 acres	n/a	n/a	n/a
C	7.75 acres	96940	Construction of 4no. dwellings	24.05.98
		98490	Outline permission for 11no. dwellings and associated site works.	n/a
		06208	12no. detached dwellings, waste water treatment systems, flood alleviation measures & site development works.	Approved 06.10.06
		08522	Retention permission for development works approved under ref. 06208 including flood alleviation works, storm water drainage and construction of roads, footpaths, public lighting etc.	Approved 28.07.08
		0958	Permission consequent to 06/208	Approved 22.05.09
		1368	Extension of Duration of planning ref. 08/522.	Approved 20.05.13

- 4.5 Site A has been zoned and included in the village boundary since 2001 but has generated zero applications for development. Site B is an active farm with no interest either shown in providing new housing. Site C has history of various applications for development as far back as 1996 yet has remained undeveloped. None of the planning permissions summarised in the table above remain valid. The 2013 Extension of Duration permission expired in July 2018. We note that a substantial portion of the centre and southern areas of Site C are within Flood Zone B. The Department of Environment Heritage & Local Government's *The Planning System and Flood Risk Management Guidelines (2009)* advocates for the development of other lands in preference to and before lands which are vulnerable to flooding events. It would further highlight the unsuitability of Site C to remain the focus of potential future housing provision for the village.
- 4.6 The overall quantum of undeveloped lands equates to approximately 14.44 acres or 5.84Ha which, if removed from the village settlement boundary, more than compensates for the 8 acres within the subject site.
- 4.7 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.

- 4.8 We envisage the subject site providing a cluster of 12no. individual development plots of a development density and layout commensurate with and complementary to the surrounding urban form. The development of the subject site closer to the village core 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 by facilitating housing opportunities for those who do not qualify for rural one-off housing but still wish to live rurally.
- 4.9 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 and will in fact result in a reduction in the number of potential new units serving Sandpit.
- 4.10 In this regard we hope the County Council is favourably disposed to our submission and will make the necessary alterations to Map 5.20 as requested.
- 4.11 If the Forward Plans Team has any queries regarding this submission please do not hesitate to contact us.