

Query 1

I question the proposal that the entire county, including all its rural environs, are under strong urban influence and request the council to reassess the impact that this is having in this development plan for rural housing as it means that the second choice below, as per page 74 of the National Development Framework, is now being essentially ignored in this development plan:

National Policy Objective 19

Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:

- 1. In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;*
- 2. In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements*

Query 2

Page 74 of the National Development Framework states:

This arises because in some locations, almost all recent single housing in the countryside has been developed privately, with social housing provided largely in settlements. In many parts of rural Ireland, where a significant majority of housing output is in the countryside, this has contributed to spatial and social imbalance and the decline in population of smaller settlements. As a result, many key services have closed, in part due to population decline, leaving more marginalised and vulnerable citizens without access to those services.

In Section 3.17.2 Policy Context of this draft development plan it states (with regard to this national plan):

The document identifies a link between the spatial imbalance created by one off housing and the impact this has had on the decline of smaller settlements and the level of services available.

This appears to be a misrepresentation of this statement in the national plan – as it does not state ‘in all of rural Ireland’ but ‘in many parts of rural Ireland’.

Can Louth County Council please advise:

- Is the significant majority of housing output in County Louth in the countryside and not in urban areas in the last development plan period? If so, please provide those statistics in the development plan for reference.

Query 3

3.17

This is presenting challenges for the long term sustainability of rural areas as the landscape is being gradually eroded and farmland is slowly being depleted.

This is a very broad statement. Does Louth County Council have statistics of percentages of farmland that has been depleted and in what zones/areas?

Query 4

3.17.1 Rural Housing and Climate Change

The proliferation of individual septic tanks and waste water treatment systems is also impacting on soil and water quality.

Again, given the percolation and soakway tests that all applicants have to pay for and undertake in order to prove that the site for a one-off dwelling is suitable before submitting a planning application to the council, this again is a very broad statement and needs to be backed up with statistics and sources.

Query 5

The plan quotes the *Sustainable Rural Housing, Guidelines for Planning Authorities (2005)*:

They require the needs of rural communities to be identified in the development plan process and that residential development is accommodated at appropriate locations necessary to sustain rural communities.

How were the needs of rural communities identified for this plan? Virtual Planning Clinics over a 3-week period in the midst of a pandemic do not replace the requirement for face to face local meetings and the possibility of communication with local and council representatives that would be needed to ensure that the needs of rural communities are being considered and integrated into a plan that will have an immense impact on all those who live and work in the countryside in Louth.

Query 6

Regarding *Section 3.17.4 Rural Generated Housing Need* and the notes that;

For clarification any persons from Rural Policy Zone 1 who are native residents of the area and have demonstrated a rural housing need but are not engaged in full time agricultural activities will be deemed to qualify to build on a suitably located site in Rural Policy Zone 2. The application site shall not normally be a distance of more than 6 kilometres from the qualifying family residence.

What happens if there is no site owned by the landowner in Rural Policy Zone 2?

The above goes directly against the statement on the same page that this plan:

'recognises the importance of facilitating people with a strong economic or social link to their local rural area , in strengthening the rural community'

Query 7

Ref: Table 3.4:

Permission will be considered for 2 no. dwellings, in addition to the family home, for a son or daughter of a landowner who are native residents of the area to build a first home for permanent occupation. A qualifying landowner is defined as a person who owns a landholding of at least 3 hectares and has owned the land for a minimum of 10 years. Any applicant under this category must demonstrate a rural housing need and shall not have previously owned a dwelling. Any application will be subject to the appropriate siting and consideration of proper planning and sustainable development.

What happens if a landowner has 3+ children? Are the younger children not to be given the same opportunity to live in the area in which they grew up because of their date of birth?

Query 8

Table 3.5: Local Housing Need Qualifying Criteria in Rural Policy Zone 2

3. 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.

4. A native resident who is seeking to build a house in 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.

5. An emigrant who is a native resident of the area (resided in the area for at least 18

years) and wishes to return to the area to live. The applicant shall not own or have sold a residential property in the County for a minimum of 10 years prior to making an application.

Please advise as to why the underlined sections above has now been expanded to cover the whole county as opposed to the 'rural area of the county', as per the last development plan?

Query 9

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.

So this could mean that if a person leaves the rural area of the county where they grew up to study for a period of years from 18-26 (up to PhD level perhaps) and/or works for a number of years elsewhere to build their career due to no suitable employment being available in Louth, and then wants to return home to build, live and allow their children to grow up in their indigenous area, they will not be allowed to do so as they have had a short period not living in this area? This definition of a native resident needs to be redesigned with immediate effect.

Query 10

3.17.7 Capacity of Areas to Absorb Further Development

In this regard, if it is considered that an area is becoming over developed due to the proliferation of one off housing and the local infrastructure does not have the capacity to accommodate further development, it is unlikely that planning permission will be granted.

13.9.41 Site Selection

In addition to integration, the ability of the landscape to absorb further development of one-off housing should also be taken into account. If there is an existing proliferation of one-off houses in the area, the local landscape may be at a point where any further development would completely erode the rural character of the area. Evidence of over proliferation of housing includes the number of existing dwellings in the area, the extent of intermittent views of dwellings, and the capacity of the local road network to accommodate further development. Areas of the County where the character of the countryside is under severe pressure or being extensively eroded will generally not be suitable for any further development of one-off housing.

Exactly how/when will this be decided in the various areas and communicated to future applicants well in advance of going to the expense of getting plans made? How will the council ensure that this is done in a fair & transparent manner?

Query 11

13.9.43 Backland Development

The Council will not generally favour proposals which involve development located to the rear of established buildings, located along a private lane off public roads and which introduce a piecemeal form of backland development. This type of development results in a scattered arrangement of housing or clustered to the rear of existing properties and often long laneways to reach the properties.

It is not respectful of the traditional settlement pattern, creates a built-up appearance thereby eroding the rural character and further fragmenting agricultural lands, reduces residential amenity standards and can have an impact on traffic safety.

Backland Development will only be considered in Rural Policy Zones 1 and 2 where the applicants' site has been owned by the family for at least 15 years and the landholding is at least 1.5 hectares. Only one dwelling will be permitted per landowner. Any backland development should be accompanied by a deed of right of way to the proposed dwelling and must not have a negative impact on traffic safety.

This is a term that did not exist in the previous development plan and yet has been a reasons for the refusal of many applications for rural housing over the last number of years.

It needs to be further defined in this plan for the avoidance of doubt and to ensure that is not applied incorrectly – is backland development when a house is positioned behind other houses? If so, a development using a laneway to access it from a public road but not behind any other houses could not be considered as backland development.

Ref: the statement that '*Only one dwelling will be permitted per landowner*' – again, what if a landowner has more than 1 child and no other site on which to build? As per Query 7 above, are the younger children not to be given the same opportunity to live in the area in which they grew up because of their date of birth?