

## **Submission on Draft Louth County Development Plan from Councillor Marianne Butler**

I want to start by complementing the Chief Executive, senior management, planners and staff of Louth County Council for their work in preparing the draft plan. I welcome significant improvements on many issues from previous development plans. My submission is an effort to include further positive changes to the plan, that will in turn benefit people currently living in the county and future generations.

### ***Chapter 1 Introduction***

Strategic Objective SO 4

In the context that our climate crisis needs to be urgently addressed, I am proposing that 2050 be changed to 2030. We need to get our response right to global climate breakdown in the life of this plan and by the end of this decade at the latest.

### ***Chapter 2 Core Strategy and Settlement Strategy***

Amend Policy Objective CS5 to include Climate Action and Low Carbon Development (Amendment) Bill 2020

To support the implementation of the EU Green Deal, National Climate Action Plan 2019, Programme for Government 2020, Climate Action and Low Carbon Development (Amendment) Bill 2020, Climate Adaptation Strategy for Louth and the Climate Action Charter through the Draft County Development Plan and to consider, if appropriate, a variation of the draft development plan to ensure consistency with the approach to climate action recommended in any revised Development Plan Guidelines as adopted.

Under 2.14.3

Regeneration Areas

I am proposing that we add the site of the former Dunnes Stores in Park Street to this list. I understand that the site is considered a retail opportunity site. The site has been vacant since February 2009, the same length of time as the Carroll Village (although the Carroll Village did re-open for a short time in last decade). Rather than the site being vacant for another decade. I would like the area to benefit from regeneration, while retail would be preferable other development opportunities should be considered.

### ***Chapter 3***

Under 3.2.1

Add objective in relation to Land Development Agency

To actively support the work of the Land Development Agency in order to make more effective use of State lands, providing a stable, sustainable supply of land for housing.

Under 3.5

Use text of 3.5.3 as a policy objective

As part of the active land management strategy for the County, the council will establish (and populate) a Vacant Site Register, by identifying sites which are vacant, and meet the requirements of the Urban Regeneration and Housing Act and apply the Vacant Site Levy to lands identified.

Table 3.1 Lands/Areas identified for Regeneration in Louth

Add Dunnes Store Site Park Street, Dundalk

#### Housing for those seeking asylum/refugees

More generally does this chapter need to include provision of housing for asylum seekers/refugees in light of the government commitment to end the use of direct provision centres during the life of this plan?

Policy Objective

HOU 27

I think the requirement for single storey housing in large developments in excess of 100 units, should at a minimum be 5%. And this would be more in line with policy objective HOU 26

#### **Chapter 4**

Under 4.16 Burial Grounds

I would like to propose that a policy objective is added here with a view to supporting and encouraging the development of natural burial grounds. Remains are buried at a depth of five foot, coffins are natural wood or wicker no varnish or brass, no headstones or grave markers are used. Natural burial grounds support biodiversity. There are a growing number of natural burial grounds in Ireland.

This could be added to SC44 or be a stand alone policy objective

To support the development of natural burial grounds at suitable locations in the County.

#### **Chapter 6**

We need to amend an existing policy or create new policy objective, to ensure that when planning and developing the County's greenway network that they connect directly into our urban centres particularly Dundalk and Drogheda, in order to boost visitor numbers to these areas and to connect with existing public transport links. A good example of this is the Waterford Greenway bringing visitors to the heart of Waterford City.

#### **Chapter 7**

I really welcome the preparation of Local Transport Plans for Dundalk and Drogheda, as they will inevitably guide some of the decision making around the Urban Area Plans and the Local Area plans – Local Transport Plans need to be separate and distinct and be created in advance of the UAPs and LAPs.

Amend Policy Objective MOV4

Remove "as part of the preparation" replace with "in advance of the preparation".

Add new policy objective that "Preparation of Local Transport Plan will commence as soon as possible".

## MOV 7

This also ties in with 13.14.9

In line with the phasing out of the sale of petrol and diesel cars by 2030. I think it would be prudent to future proof the provision of charging points for electric vehicles and/or the supporting wiring ducting to a minimum of 25% of the total spaces. Increasing the requirement in the draft plan by 5%.

## MOV 8

In relation to 13.14.12 Car parking standards. It could be argued that the parking requirement particularly for residential units is too low. Car sharing may be one solution as well as modal shifts.

MOV 8 needs to be enhanced and changed to

To encourage and expand the provision of car sharing infrastructure and facilities at appropriately located areas throughout the County.

## MOV 20

Amend this objective to include “major employers”

To improve pedestrian and cycle connectivity to schools, third level colleges, major employers, bus and rail stations, and other public transport hubs.

Under 7.5.11

We need to reiterate my proposed new objective from Tourism chapter about connecting Greenways to our town centres and existing cycling and walking infrastructure.

I think to really support cycling and cycling tourism for all, we need to provide facilities/ducting for charging e bikes at appropriate rest stops on our Greenways and urban centres.

## MOV 33

Remove last part of this policy objective “subject to the availability of funding”. Most understand that development plans are not funded plans.

Possibly add line to objective “work to secure funding with relevant stakeholders”.

Add new objective

To identify suitable locations and secure funding to implement new initiatives such as “School Streets”.

## 7.8.4 Dundalk Link Roads

I am really concerned with the sentence. “The delivery of these link roads will be developer driven and are likely to be constructed in sections”. I fear that we could end up with road(s) to nowhere, that the public will ultimately ending up paying for.

It is necessary to include a policy objective that requires link roads to be provided and completed in advance of developments and at a minimum that the council seeks to secure cash bonds until they are completed and taking in charge to the necessary standard,

## **Chapter 8 Natural Heritage, Biodiversity and Green Infrastructure**

“Ireland is the least wooded country in the EU. Louth’s percentage (2.9%) forest area is one of the lowest in the Country and in this context, the conservation of existing woodlands is increasingly important.”

It is of real concern and an issue that this plan needs to address, in this context we need to protect existing woodlands but also seek to increase Louth’s percentage forest area, including continuous cover forests.

Where it is not already the case that we enhance the protection on any trees that are deemed

1. Champion trees
2. Trees Woodlands of Special Amenity Value

To Tree Preservation Orders.

Under Policy Objective NBG31

The replacement ratio is increased from 10:1 in all areas outside of Dundalk and Drogheda to 12:1

The replacement ratio in increased from 4:1 in Dundalk and Drogheda to 5:1

Also stipulate that replacement trees must be semi mature and native species.

Also require that as part of planning conditions that new “trees” that do not take are replaced and that trees are maintained/pruned annually/semi-annually.

Consideration needs to be given in this policy objective for native fruit trees and planting (blackberries etc).

Table 8.15

Soldier misspelled at least twice (aargh!)

VP36 & VP41

Under 8.13.2

Add new objective

That supports re-establishing connectivity between natural areas in order to restore the health of ecosystems and allow species to thrive in their natural habitats.

NBG 57

I support this objective but I am concerned about how it is worded in terms of policy objectives needing to be positive in nature (in the context of Glencar Mining Vs Mayo Co Co).

A question for the planners is how this works in the context of greenways and in large urban areas like Dundalk?

Add new policy objective

That Council supports the work of the National Biodiversity Data Centre by becoming a partner council to All Ireland Pollinator Plan.

## **Chapter 10 Infrastructure and Utilities**

In relation to Policy Objective IU 41, I would like to see this policy objective strengthened. It has been the case that telecom companies are broken up and sold. It can be difficult to determine who exactly is responsible for decommissioning obsolete telecommunication structures.

A requirement that a cash bond or other mechanism is put in place to provide for the removal of obsolete telecommunications structure in the event that the initial provider no longer exists or no longer has resources to remove same.

Add new Policy objective under 10.5.2.2

That Louth County Council signs up to the Covenant of Mayors for Climate and Energy Europe in order to be at the forefront of tackling climate action by learning from and partnering with fellow EU local authorities.

Under 10.7

Solar Energy

Text should become new policy objective

The Council will support and facilitate the development of solar energy, encourage passive solar design, solar PV and solar water heating in new buildings and in retrofitting buildings.

## **Chapter 11**

Amend Policy Objective ENV4

Policy Objective ENV 4

To support the goals and objectives of the EU Green Deal, the Climate Action Plan 2019, the Climate Action and Low Carbon Development (Amendment) Bill 2020 and the Climate Action Charter in ensuring sustainable development across the County.

11.1.5

Air Quality

Insert new objective

To support the work of the EPA in monitoring Air Quality throughout the county and to identify new locations that require real time air quality monitoring stations to be installed.

## **Chapter 12**

Similar to ENV 4

Amend Policy Objective CS5 to include Climate Action and Low Carbon Development (Amendment) Bill 2020

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to ensure consistency with the approach to climate action recommended in any revised Development Plan Guidelines as adopted.

### **Chapter 13**

#### Under 13.9.12 Landscaping

As previously stated increase tree replacement ratio from 4:1 in Dundalk and Drogheda to 5:1

In all other areas increase tree replacement ratio from 10:1 to 12:1

Stipulate that trees must be native and semi mature, encourage native fruit trees and hedging where appropriate to support pollinators.

#### Under 13.9.15 Public Open Space

Text needs to be amended in order to encourage that part of public open space requirement is used to support biodiversity, for instance developing meadows (cut at start and end of summer season), wild areas left untouched etc. Wild flower meadows and wild areas are supported.

#### Under 13.9.18

Again increase ducting and wiring required to support electric vehicle charging from 20% to 25%.

#### Under 13.11.7 Landscaping and Boundary Treatments

Again increase replacement ratio of native trees from 4:1 to 5:1 In Dundalk and Drogheda

In County areas increase ratio from 10:1 to 12:1

Require semi mature trees to be used.

#### Under 13.11.13 Landscaping and Boundary Treatment

Again increase replacement ratio of native trees from 4:1 to 5:1 In Dundalk and Drogheda

In County areas increase ratio from 10:1 to 12:1

Require semi mature trees to be used.

#### 13.12.3 Parking

In order to achieve compact growth of our regional growth centres of Dundalk and Drogheda preference should be for provision of multistorey and/or basement parking over surface parking particularly for town centre commercial, retail and apartment buildings. This would allow for optimal land use and support place making by avoiding a landscape proliferated with surface parking.

#### 13.14.4

Can we make reference to Park and Share and Kiss and Ride facilities both of which reduce car journeys and need for multiple cars in one household.

#### 13.14.9

#### Charging Points for Electric Vehicles

Again allow for necessary wiring and ducting to support charging points at a total of 25% of spaces (increase by 5%)

## Table 13.10

Is there a supporting map?

### 13.14.12

#### Car parking standards

I am genuinely concerned by the low provision of spaces in Table 13.11, my concerns are that if parking provision is inadequate it can have a detrimental effect on pedestrians, cyclists and vulnerable road users by haphazard and illegal parking blocking footpaths and access.

Consideration should be given to increasing the parking requirements for larger residential units, for instance a 5 bed home may need more spaces than a 1 bed apartment.

Incorporating facilities for car sharing into developments may decrease the necessity for parking spaces. The local travel plan is key to getting this right. Moving people to active and public travel, reduces the need for car ownership and car parking spaces. Provision needs to be made for car parking for visitors/deliveries in residential developments.

In larger commercial, industrial, retail and residential (apartments) multi storey and and/or basement parking should be encouraged to support compact growth and optimal land use.